

## Global Reporting Index

In preparing this year's report, we have drawn on the GRI's G3 reporting guidelines. A review of Old Mutual South Africa's status against each of the GRI G3 and GRI Financial Services Sector Supplement reporting criteria as covered in the 2009 sustainability report is provided in the table below.

	GRI Core Indicator
	GRI Additional Indicator
	Financial Services Sector Supplement Core indicator

GRI G3 Element		Reference in OMSA 2009 Sustainability Report
<b>STRATEGY AND PROFILE</b>		
<b>1. Strategy and Analysis</b>		
<b>1.1</b>	Statement from the most senior decision-maker of the organisation (e.g., CEO, chair) regarding the relevance of sustainability to the organisations and its strategy.	This is addressed in the statements by the CEO Long Term Savings, Old Mutual plc; and Chairman, Old Mutual South Africa (OMSA) (page 10) and by the CEO of OMSA and Emerging Markets (page 13)
<b>1.2</b>	Description of key impacts, risks and opportunities.	The key sustainability impacts, risks and opportunities are identified throughout the report. An outline of the material issues is provided on page 5, which guides the reader to the detail of each issue in the report. 'About this report' on page 5 highlights how we are working to fill gaps. How we identify our significant issues, risks and opportunities is outlined in the material issues table (page6) and in the section 'Framework for Managing Sustainability' (page14).
<b>2. Organisational Profile</b>		
<b>2.1</b>	Name of the organisation.	Old Mutual South Africa
<b>2.2</b>	Primary brands, products, and/or services.	These are outlined in 'About Old Mutual South Africa' (page 9) and are further detailed throughout the report.
<b>2.3</b>	Operational structure of the organisation, including main divisions, operating companies, subsidiaries, and joint ventures.	The operational structure of the Old Mutual plc is outlined on <a href="http://www.oldmutual.co.za/about-us/company-profile/old-mutual-south-africa">www.oldmutual.co.za/about-us/company-profile/old-mutual-south-africa</a> .
<b>2.4</b>	Location of organisation's headquarters.	OMSA Headquarters based in Greyston Drive, Sandton, Gauteng.
<b>2.5</b>	Number of countries where the organisation operates, and names of countries with either major operations or that are specifically relevant to the sustainability issues covered in the report.	Old Mutual plc's African Operations (including Kenya, Namibia, Malawi, Swaziland and Zimbabwe) report into OMSA and are discussed on page 102.
<b>2.6</b>	Nature of ownership and legal form.	Old Mutual (South Africa) Limited is a public company incorporated in accordance with the laws of the Republic of South Africa. It is a wholly owned subsidiary of the listed company, Old Mutual plc, and is directly owned by OLD MUTUAL (NETHERLANDS) B.V. The BEE effective ownership is 23.21% under the Codes, which is achieved through the BEE entities owning shares in Old Mutual plc.
<b>2.7</b>	Markets served (including geographic breakdown, sectors served, and types of customers/beneficiaries)	These are discussed in the section 'Serving our Customers' on page 20.
<b>2.8</b>	Scale of the reporting organisation, including: <ul style="list-style-type: none"> <li>Number of employees;</li> <li>Net sales (for private sector organisations) or</li> </ul>	OMSA has a total of 16 984 employees across its South African operations and 2 291 employees in its African operations. These are discussed further in 'Ensuring

	<p>net revenues (for public sector organisations);</p> <ul style="list-style-type: none"> <li>• Total capitalization broken down in terms of debt and equity (for private sector organisations); and</li> <li>• Quantity of products or services provided.</li> </ul>	<p>our status as an employer of choice' on page 85. Details of net sales and total capitalisation are provided in the overview of OMSA on page 9. Quantities of products and services are detailed throughout the report.</p>
2.9	<p>Significant changes during the reporting period regarding size, structure, or ownership including:</p> <ul style="list-style-type: none"> <li>• The location of, or changes in operations, including facility openings, closings, and expansions; and</li> <li>• Changes in the share capital structure and other capital formation, maintenance, and alteration operations (for private sector organisations).</li> </ul>	<p>While the Old Mutual plc group was previously segmented on a geographic basis (South Africa; Other Emerging Markets; Europe; Asia; and United States), the management structure was changed in 2009 to focus on Long-term Savings; Banking; Short-term Insurance and US Asset Management.</p> <p>Changes in the reporting period related to the opening of new branches have been captured throughout the report.</p>
2.10	Awards received in the reporting period.	Awards received are outlined throughout the report where relevant.
<b>3. Report Parameters</b>		
3.1	Reporting period (e.g., fiscal/calendar year) for information provided.	The report covers the period 1 January 2009 to 31 December 2009.
3.2	Date of most recent previous report (if any).	A Corporate Citizenship Report was last produced in May 2009.
3.3	Reporting cycle (annual, biennial, etc.)	OMSA follows an annual reporting cycle.
3.4	Contact point for questions regarding the report or its contents.	Benji Norman: Chief Transformation Officer: OMSA. See page 118 for contact details.
3.5	<p>Process for defining report content, including:</p> <ul style="list-style-type: none"> <li>• Determining materiality;</li> <li>• Prioritizing topics within the report; and</li> <li>• Identifying stakeholders the organisation expects to use the report.</li> </ul>	<p>How we identify our significant issues, risks and opportunities is outlined in the material issues table (page 6) and in the section 'Framework for managing sustainability' (page 14). Topics focused on in the report are those where OMSA is either making or has the potential to make a significant impact (i.e. reducing negative impacts or promoting positive impacts).</p> <p>Our stakeholder engagement strategy outlined on page 18 provides an overview of our stakeholders, all of whom we expect to use this report. While the print report provides a summary that is aimed to be accessible to all stakeholders, the detailed web report may be of more interest to those stakeholders who are interested in the finer detail.</p>
3.6	Boundary of the report (e.g., countries, divisions, subsidiaries, leased facilities, joint ventures, suppliers).	The boundaries of the report are covered in 'About this report' on page 5.
3.7	State any specific limitations on the scope or boundary of the report.	We acknowledge that we are far from covering all sustainability reporting gaps. Our reporting process has helped us identify where we are not addressing our sustainability issues sufficiently and thus establish the required structures and measures to improve the situation. We have not engaged extensively with external stakeholders in the development of this report, but aim to do so in future reports. The sustainability issues of Old Mutual's African Operations, which have recently begun reporting into OMSA, are covered only at a high level. Old Mutual's operations in other emerging market countries such as Columbia, Mexico, India and China are not covered in this report. With these countries now reporting to the CEO of OMSA and Emerging Markets, they will need to be covered in the 2010 sustainability report.
3.8	Basis for reporting on joint ventures, subsidiaries, leased facilities, outsourced	Certain of these entities are included in report data, but a thorough check has not been done to ensure

	operations, and other entities that can significantly affect comparability from period to period and/or between organisations	consistency in reporting. The Human Resources data for JVs and certain subsidiaries has not yet been fully incorporated into that for OMSA. The environmental data from leased facilities is partially reported on.
3.9	Data measurement techniques and the bases of calculations, including assumptions and techniques underlying estimations applied to the compilation of the indicators and other information in the report.	Reporting for legislative compliance (i.e. Human Resources data) follows the relevant guidelines for data compilation. Survey methodologies underlying independent surveys are checked for validity, but not reported on herein. Environmental data for the properties we manage has been calculated or estimated from utility bills.
3.10	Explanation of the effect of any re-statements of information provided in earlier reports, and the reasons for such re-statement (e.g., mergers/ acquisitions, change of base years/periods, nature of business, measurement methods).	No major re-statements of information have occurred in the last financial year.
3.11	Significant changes from previous reporting periods in the scope, boundary, or measurement methods applied in the report.	This year's report aims to report on broader issues of sustainability than previous years. The scope of the reporting now includes Africa Operations. This is discussed in further detail in 'About this report' on page 5.
3.12	GRI content index	A summary GRI content index is provided on page 68 of the print report. The detailed GRI context index (this document) is made available on our website.
3.13	Assurance	This report has not been assured.
<b>4. Governance, Commitments and Engagement</b>		
<b>Governance issues</b>		
4.1	Governance structure of the organisation, including committees under the highest governance body responsible for specific tasks, such as setting strategy or organisational oversight.	A full review of OMSA's corporate governance activities is provided in the annual report. A review of OMSA's governance activities relating specifically to sustainability issues is provided in the section 'Framework for managing sustainability' on page 14.
4.2	Indicate whether the Chair of the highest governance body is also an executive officer (and, if so, their function within the organisation's management and the reasons for this arrangement).	A full review of OMSA's corporate governance activities is provided in the annual report.
4.3	For organisations that have a unitary board structure, state the number of members of the highest governance body that are independent and/or non-executive members.	A full review of OMSA's corporate governance activities is provided in the annual report.
4.4	Mechanisms for shareholders and employees to provide recommendations or direction to the highest governance body.	This falls under the Old Mutual plc, which is busy rolling out the operational model and will describe how the businesses must be run. The model will provide minimum requirements for how boards and committees should operate and will include a relationship agreement btw Plc and the Board. i.e. currently in flux and still to be defined
4.5	Linkage between compensation for members of the highest governance body, senior managers, and executives (including departure arrangements), and the organisation's performance (including social and environmental performance).	Executive compensation for 2010 has been linked to risk-adjusted performance measures. See page 106 of the Old Mutual Plc Annual Report 2009.
4.6	Processes in place for the highest governance body to ensure conflicts of interest are avoided.	OMSA adheres to the regulations requirements regarding governance conflicts of interest. OMSA recently introduced a Lead Independent Director (as recommended in King III) to step in when the Chairman or any director is conflicted. This ensures the independence aspect of the board.

4.7	Process for determining the qualifications and expertise of the members of the highest governance body for guiding the organisation's strategy on economic, environmental, and social topics.	A full review of OMSA's corporate governance activities is provided in the annual report. OMSA follows the plc operating model.
4.8	Internally developed statements of mission or values, codes of conduct, and principles relevant to economic, environmental, and social performance and the status of their implementation.	The section 'Ensuring ethical behaviour' on page 64 covers the Company Code of Conduct and all underlying codes and policies. OMSA has developed various policies and complies with various nationally and internationally agreed standards relating to its economic, environmental, and social performance. This are detailed through the report. Specific reference to sustainability-related indices is given in the 'About this report' and the 'Framework for managing sustainability' sections.
4.9	Procedures of the highest governance body for overseeing the organisation's identification and management of economic, environmental, and social performance, including relevant risks and opportunities, and adherence or compliance with internationally agreed standards, codes of conduct, and principles.	How we identify our significant issues, risks and opportunities is outlined in the material issues table (page 6) and in the section 'Framework for managing sustainability' (page 14). Our risk governance is run through a three lines of defence model. Enterprise Risk Management is managed by the chief risk officer (CRO) who attends, reports to and advises the OMSA Executive Board and the Audit, Risk and Compliance Committee on all key risks and control breaks of the company.
4.10	Processes for evaluating the highest governance body's own performance, particularly with respect to economic, environmental, and social performance.	The Board, Committee of Customer Affairs and Audit Committee all perform self-evaluation. The Environmental Committee is not yet self-assessed.
<b>Commitment to external initiatives</b>		
4.11	Explanation of whether and how the precautionary approach/ principle is addressed by organisation	This is not explicitly addressed in the report. This would be relevant to OMSA's decision making.
4.12	Externally developed economic, environmental, and social charters, principles, or other initiatives to which the organisation subscribes or endorses.	OMSA has committed to various external charters and initiatives, which are mentioned throughout the report.
4.13	Memberships in associations (such as industry associations) and/or national/international advocacy organisations in which the organisation: <ul style="list-style-type: none"> <li>• Has positions in governance bodies;</li> <li>• Participates in projects or committees;</li> <li>• Provides substantive funding beyond routine membership dues; or</li> <li>• Views membership as strategic.</li> </ul>	A list of OMSA's membership in associations is provided in the web report on page 19.
<b>Stakeholder engagement</b>		
4.14	List of stakeholder groups engaged by the organisation.	This is provided in the 'Stakeholder engagement' section on page 18.
4.15	Basis for identification and selection of stakeholders with whom to engage.	This is provided in the 'Stakeholder engagement' section on page 18.
4.16	Approaches to stakeholder engagement, including frequency of engagement by type and by stakeholder group.	This is provided in the 'Stakeholder engagement' section on page 18.
4.17	Key topics and concerns that have been raised through stakeholder engagement, and how the organisation has responded to those key topics and concerns, including through its reporting.	This is provided in the 'Stakeholder engagement' section on page 18.

MANAGEMENT APPROACH AND PERFORMANCE INDICATORS		
ECONOMIC – including policies, management systems, management approach and performance relating to the following indicators		
Economic performance		
EC1	Direct economic value generated and distributed, including revenues, operating costs, employee compensation, donations and other community investments, retained earnings, and payments to capital providers and governments.	Summary of value-added information is provided on page 9. Full details are in the annual financial review.
	Additional to management approach for EC1: (see page 32 of FSSS) businesses goals for community investment across each community investment type including: <ul style="list-style-type: none"> <li>the intended benefits for the recipient and your business;</li> <li>desire/expected outcomes from the community investment activity;</li> <li>how community investment activities are identified and management; and</li> <li>how performance and value for money is assessed.</li> </ul>	This is covered in the section ‘Supporting our communities’ on page 76.
EC2	Financial implications and other risks and opportunities for the organisation’s activities due to climate change.	At an Old Mutual plc level, there is ongoing public commitment to addressing climate change through supporting the work of the UN as a signatory to the Copenhagen Communiqué.  By better understanding its own impacts through Old Mutual plc’s second public submission to the Carbon Disclosure Project the plc has been able to implement carbon reduction strategies across the Group.
EC3	Coverage of the organisation’s defined benefit plan obligations.	This is not reported on.
EC4	Significant financial assistance received from government.	OMSA does not receive financial assistance from government.
Market Presence		
EC5	Range of ratios of standard entry level wage compared to local minimum wage at significant locations of operation.	OMSA does not currently report on this indicator.
EC6	Policy, practices, and proportion of spending on locally-based suppliers at significant locations of operation.	This is discussed in the section on ‘Continuing our commitment to transformation’ on page 66.
EC7	Procedures for local hiring and proportion of senior management hired from the local community at locations of significant operation.	Our African Operations aim to ensure that a large proportion of our workforce are local employees, with expatriates focusing on the transfer of skills and on learning from experiences that they can then share with OMSA’s other operations. The percentage breakdown of Exco teams in each country being local is as follows: Kenya - 83% local; Zimbabwe - 100% local; Malawi - 100% local; Namibia - 83% local. We only have one senior manager in Swaziland, who is from South Africa.
Indirect economic impacts		
EC8	Development and impact of infrastructure investments and services provided primarily for public benefit through commercial, in-kind, or pro bono engagement.	This is covered primarily in the sections ‘Investing responsibly’ on page 42, and ‘Supporting our communities’ on page 76.
EC9	Understanding and describing significant	The majority of OMSA’s work leads to direct and

	indirect economic impacts, including the extent of impacts.	indirect economic impacts, with indirect impacts including enterprise development, providing financial services to the lower LSMs etc. These are discussed throughout the report.
<b>ENVIRONMENTAL – including policies, management systems, management approach and performance relating to the following indicators</b>		
<b>Material use</b>		
<b>EN1</b>	Materials used by weight or volume.	OMSA does not account separately for this. This would be applicable in OMIGPI's new build projects.
<b>Energy use</b>		
<b>EN3</b>	Direct energy consumption by primary energy source.	We do not report on this parameter as all the fossil fuel-based energy we use is sourced external to the organisation.
<b>EN4</b>	Indirect energy consumption by primary energy source.	We consumed a total of 552 364 472 kWh of electricity during the reporting period. This figure includes the electricity consumption by OMIGPI-managed buildings. Where a property has been sold or acquired, the data has been included only for the period that that the building was under our management. See page 98 for further information.
<b>EN5</b>	Energy saved due to conservation and efficiency improvements.	Two energy efficiency initiatives have resulted in significant savings. A DSM initiative in the Western Cape resulted in an average saving of 864 368 kWh each month across five buildings; and an air-conditioning controls initiative run at Menlyn Park Shopping Centre in Gauteng is saving an average of 875 992 kWh each month. Further details are available on page 98.
<b>EN6</b>	Initiatives to provide energy-efficient or renewable energy based products and services, and reductions in energy requirements as a result of these initiatives.	We promote the provision of renewable energy through our IDEAS Fund Socially Responsible Investment fund (see page 51). While we have further initiatives in the pipeline that will serve to promote energy efficient or renewable energy products and services, these are not yet at the stage where we can report on them.
<b>EN7</b>	Initiatives to reduce indirect energy consumption and reductions achieved.	This parameter is covered in EN5 and on page 98 of the report.
<b>Total water use</b>		
<b>EN8</b>	Total water withdrawal by source.	We consumed a total of 4 100 604 m <sup>3</sup> of water during the reporting period. This figure includes the water consumption by OMIGPI-managed buildings. Where a property has been sold or acquired, the data has been included only for the period that that the building was under our management. See page 98 for further information.
<b>EN9</b>	Water sources significantly affected by withdrawal of water.	This parameter is not reported on as it is not deemed to be material to OMSA.
<b>EN10</b>	Percentage and total volume of water recycled and reused.	While this parameter is not reported on in its entirety, a water recycling project implemented at one of our retail centre sites has lead to a monthly saving of 2 million litres of water.
<b>Biodiversity</b>		
<b>EN11</b>	Location and size of land owned, leased, managed in, or adjacent to, protected areas of high biodiversity value outside protected areas.	This parameter would be material for the properties that we develop and manage, but is not reported on.
<b>EN12</b>	Description of significant impacts of activities, products and services on biodiversity in protected areas and areas of high biodiversity value outside protected areas.	This parameter might be material for certain investments that we make (e.g. in the mining sector), but is not currently reported on.
<b>EN13</b>	Habitats protected or restored.	This parameter would be material for the properties that we develop and manage, but is not reported on.
<b>EN14</b>	Strategies, current actions, and future plans for managing impacts on biodiversity.	This parameter would be material for the properties that we develop and manage, but is not reported on.

<b>EN15</b>	Number of IUCN Red List species and national conservation list species with habitats in areas affected by operations, by level of extinction risk.	This parameter would be material for the properties that we develop and manage and perhaps for elements of investment decision making, but is not reported on.
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<b>Emissions effluents and waste</b>		
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<b>EN16</b>	Total direct and indirect greenhouse gas emissions by weight. From the FSSS (p.22) Financial institutions should estimate the greenhouse gas (GHG) emissions resulting from their business travel as this represents one of the major direct impacts of financial institutions.	We do not produce direct greenhouse gases. While it would be possible to calculate our indirect greenhouse gas emissions for the buildings that we use and manage, we have not yet done so. We do not report on our business travel and consequent greenhouse gas emissions
<b>EN17</b>	Other relevant indirect greenhouse gas emissions by weight.	We do not report on our business travel and consequent greenhouse gas emissions.
<b>EN18</b>	Initiatives to reduce greenhouse gas emissions and reductions achieved.	Initiatives to reduce greenhouse gas emissions are detailed on page 98. Two energy efficiency initiatives resulted in energy savings of 864 368 kWh / month; and an average of 875 992 kWh / month. The former of these resulted in a CO <sub>2</sub> saving of 16 182 tonnes from February 2008 to September 2009. Further details are available on page 98.
<b>EN19</b>	Emissions of ozone depleting substances by weight.	This parameter is not reported on as it is not deemed to be material to OMSA.
<b>EN20</b>	NO, SO, and other significant air emissions by type and weight.	This parameter would be material for the properties that we develop and manage, but is not reported on.
<b>EN21</b>	Total water discharge by quality and destination.	This parameter would be material for the properties that we develop and manage, but is not reported on.
<b>EN22</b>	Total weight of waste by type and disposal method.	We produced a total of 4 698 320 kg of non-recyclable waste and recycled a total of 2 549 065 kg of waste during the reporting period. This figure includes the waste produced and recycled at OMIGPI-managed buildings. Where a property has been sold or acquired, the data has been included only for the period that that the building was under our management. See page 98 & 99 for further information.
<b>EN23</b>	Total number and volume of significant spills.	This parameter is not reported on as it is not deemed to be material to OMSA.
<b>EN24</b>	Weight of transported, imported, exported, or treated waste deemed hazardous under the terms of the Basel Convention Annex I, II, III, and VIII, and percentage of transported waste shipped internationally.	This parameter is not reported on as it is not deemed to be material to OMSA.
<b>EN25</b>	Identity, size, protected status, and biodiversity value of water bodies and related habitats significantly affected by the reporting organisation's discharges of water and runoff.	This parameter is not reported on as it is not deemed to be material to OMSA.

<b>Products and services</b>		
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<b>EN26</b>	Initiatives to mitigate environmental impacts of products and services, and extent of impact mitigation.	This is discussed in the sections 'Investing responsibly' on page 42 and 'Minimising and managing our impact on the environment' on page 97.
<b>EN27</b>	Percentage of products sold and their packaging materials that are reclaimed by category.	This parameter is not reported on as it is not deemed to be material to OMSA.

<b>Compliance</b>		
<b>EN28</b>	Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with environmental laws and regulations.	OMSA has not been issued with any fines or sanctions for non-compliance for environmental laws and regulations.
<b>Transport</b>		
<b>EN29</b>	Significant environmental impacts of transporting products and other goods and materials used for the organisation's operations, and transporting members of the workforce.	We do not report on the environmental impacts of staff commuting or business travel. Transportation of product, goods and materials is not a material issue for OMSA.
<b>Overall</b>		
<b>EN30</b>	Total environmental protection expenditures and investments by type.	OMSA does not currently report on this parameter. It is often difficult to quantify expenditure that relates specifically to environmental protection (particularly when this forms part of other project requirements), and the added value in doing so is not immediately visible.
<b>SOCIAL -- including policies, management systems, management approach and performance relating to the following indicators</b>		
<b>Labour practices and decent work</b>		
<b>Employment</b>		
<b>LA1</b>	Total workforce by employment type, employment contract and region.	Data on the total workforce numbers at a company level – broken down into permanent and non-permanent employees – is provided on page 86. OMSA does not include a detailed breakdown by employment type, contract and region.
<b>LA2</b>	Total number and rate of employee turnover by age group, gender and region.	Employee turnover levels are reported at OMSA level on page 86 of the report. Employee turnover at a gender, age group and region level is reported internally.
<b>LA3</b>	Benefits provided to full-time employees that are not provided to temporary or part-time employees, by major operations.	OMSA does not currently report specifically on this parameter.
<b>Labour / management relations</b>		
<b>LA4</b>	Percentage of employees covered by collective bargaining agreements.	Approximately 40% of our permanent workforce are represented by independent trade union organisations or covered by collective bargaining agreements. Further information is provided in the section 'Ensuring our status as an employer of choice' on page 85.
<b>LA5</b>	Minimum notice period(s) regarding operational changes, including whether it is specified in collective agreements.	This is covered in the section 'Ensuring our status as an employer of choice' on page 85.
<b>Occupational health and safety</b>		
<b>LA6</b>	Percentage of total workforce represented in formal joint management-worker health and safety committees that help monitor and advise on occupational health and safety programmes.	This parameter is not reported on as it is not deemed to be material to OMSA.
<b>LA7</b>	Rates of injury, occupational diseases, lost days, and absenteeism, and number of work-related fatalities by region.	This parameter is not reported on as it is not deemed to be material to OMSA.
<b>LA8</b>	Education, training, counselling, prevention, and risk-control programmes in place to assist workforce members their families, or community members regarding serious diseases.	This is covered in the 'Employee well-being' section in 'Ensuring our status as an employer of choice' on page 94.
<b>LA9</b>	Health and safety topics covered in formal agreements with trade unions.	This is covered in the section 'Ensuring our status as an employer of choice' on page 85.
<b>Training and education</b>		
<b>LA10</b>	Average hours of training per year per employee by employee category.	We do not measure our employee training in hours of training. Our skills and career development strategy



		and initiatives are discussed on page 88. The Old Mutual Business School learning interventions include a variety of classroom training interventions in support of our curriculum, with 10 259 delegates in 2009; online performance support (Harvard Manage Mentor which provides a range of online modules and tools to support our managers in the workplace); and elearning modules developed around specific initiatives.
LA11	Programmes for skills management and lifelong learning that support the continued employability of employees and assist them in managing career endings.	As covered under LA10.
LA12	Percentage of employees receiving regular performance and career development reviews.	OMSA has 100% final performance assessment ratings on all employees. Performance assessment discussions have been held for 98.5% of employees (with the others being on paybridge, secondees, maternity leave etc).

<b>Diversity and equal opportunity</b>		
LA13	Composition of governance bodies and breakdown of employees per category according to gender, age group, minority group membership, and other indicators of diversity.	The composition of governance bodies is provided in our Annual Report. The breakdown of employees per gender and race group is provided on page 71.
LA14	Ratio of basic salary of men to women by employee category.	The basic salaries of men and women in OMSA are equal.
<b>Human Rights</b>		
<b>Investment and procurement practices</b>		
HR1	Percentage and total number of significant investment agreements that include human rights clauses or that have undergone human rights screening.	OMSA does not currently report specifically on this parameter.
HR2	Percentage of significant suppliers and contractors that have undergone screening on human rights and actions taken.	OMSA does not currently report specifically on this parameter.
HR3	Total hours of employee training on policies and procedures concerning aspects of human rights that are relevant to operations, including the percentage of employees trained.	Employees are trained on issues of diversity. Our asset management arm is not trained specifically on issues relating to human rights.
<b>Non-discrimination</b>		
HR4	Total number of incidents of discrimination and actions taken.	OMSA does not currently report specifically on this parameter.
<b>Freedom of association and collective bargaining</b>		
HR5	Operations identified in which the right to exercise freedom of association and collective bargaining may be at significant risk, and actions taken to support these rights.	All industrial relations issues are covered on page 93. Operations in which we are invested are not reported on specifically for this parameter.
<b>Child labour</b>		
HR6	Operations identified as having significant risk for incidents of child labour, and measures taken to contribute to the elimination of child labour	Operations in which we are invested are not reported on specifically for this parameter.
<b>Forced and compulsory labour</b>		
HR7	Operations identified as having significant risk for incidents of forced or compulsory labour, and measures to contribute to the elimination of forced or compulsory labour.	Operations in which we are invested are not reported on specifically for this parameter.
<b>Security practices</b>		
HR8	Percentage of security personnel trained in the organisation's policies or procedures concerning aspects of human rights that are relevant to operations.	Operations in which we are invested are not reported on specifically for this parameter.

<b>Indigenous rights</b>		
<b>HR9</b>	Total number of incidents of violations involving rights of indigenous people and actions taken.	Operations in which we are invested are not reported on specifically for this parameter.

<b>Society</b>		
<b>Community</b>		
<b>SO1</b>	Nature, scope, and effectiveness of any programmes and practices that assess and manage the impacts of operations on communities, including entering, operating and exiting.	<p>We measure the effects and sustainable positive impact of our CSI programmes through the contributions made to job creation, education and skills creation; the number of our employees who are actively involved in their communities through the staff volunteer programmes and the extent to which our CSI interventions enhance the Old Mutual brand.</p> <p>We have implemented an electronic project management system, which produces reports to effectively manage and account for funds that are disbursed, including contractual agreements, monitoring and evaluation and progress reports.</p>
<b>FS13</b>	Access points in low-populated or economically disadvantaged areas by type	We are increasingly focused on providing access to financial services for those living in low-populated or economically disadvantaged areas. Part of this approach includes the provision of access points providing appropriate services in these areas. Product access is reported on in the section 'Serving our Customers'.
<b>FS14</b>	Initiatives to improve access to financial services for disadvantaged people.	Product access is reported on in the section 'Serving our Customers'. This is focused primarily on access to financially disadvantaged individuals and communities.
<b>Corruption</b>		
<b>SO2</b>	Percentage and total number of business units analyzed for risks related to corruption.	All business units are analysed for risks related to corruption. This is discussed in the section 'Ensuring Ethical Behaviour' on page 64.
<b>SO3</b>	Percentage of employees trained in organisation's anti-corruption policies and procedures.	<p>Employees are required to sign off the Company Code of Conduct (CoC) on an annual basis. The CoC encompasses amongst others: the Code of Ethics; the Policy on Fraud, Theft, Corruption, Cyber-crime and Associated Internal Irregularities; Conflicts of Interest Policy; Moonlighting Policy; Gifts Policy; and a Whistle-Blowing Policy.</p> <p>A recently conducted Fraud Health Check Survey will provide guidance on appropriate targeting, focusing for example, on raising awareness of staff in specific high-risk functions.</p>
<b>SO4</b>	Actions taken in response to incidents of corruption.	OMSA reports incidents of corruption as specified in the Prevention and Combating of Corrupt Activities Act No.12 of 2004.
<b>Public policy</b>		
<b>SO5</b>	Public policy positions and participation in public policy development and lobbying.	OMSA engages with public policy development. This is covered in the section on 'Stakeholder Engagement'.
<b>SO6</b>	Total value of financial and in-kind contributions to political parties, politicians, and related institutions by country.	OMSA does not make financial contributions to any of these groups.
<b>Anti competitive behaviour</b>		
<b>SO7</b>	Total number of legal actions for anticompetitive behaviour, anti-trust, and monopoly practices and their outcomes.	There have been no legal actions for anticompetitive behaviour or anti-trust and monopoly practices.
<b>Compliance</b>		
<b>SO8</b>	Monetary value of significant fines and total	There have been no incidences of material non-

	number of non-monetary sanctions for non-compliance with laws and regulations.	compliance with primary legislation and regulation reported to the Regulator during the year.
<b>Product and service impact performance</b>		
<b>Management approach</b>		
<b>FS1</b>	Policies with specific environmental and social components applied to business lines.	This parameter includes policies pertaining to investment in countries or regions that are considered controversial. In this light, as the leading financial services group in the country, Old Mutual Zimbabwe has a conscious strategy to continue operating in order for us to add value to our clients and staff. We will remain a key and major participant in the Zimbabwe economy in the rebuilding of the country. Specific environmental and social policies as applied to business line have not yet been developed for OMSA.
<b>FS2</b>	Procedures for assessing and screening environmental and social risks in business lines.	While we do conduct appropriately thorough due diligence on our investments, we are not able in all cases to necessarily identify environmental, social and governance issues in a comprehensive way.
<b>FS3</b>	Processes for monitoring clients' implementation of and compliance with environmental and social requirements included in agreements or transactions.	While we do conduct appropriately thorough due diligence on our investments, we do not have specified environmental and social requirements against which to monitor our clients' compliance.
<b>FS4</b>	Process(es) for improving staff competency to implement the environmental and social policies and procedures as applied to business lines.	This is not yet being undertaken.
<b>FS5</b>	Interactions with clients/investors/business partners regarding environmental and social risks and opportunities.	This is not yet being undertaken.
<b>Product portfolio</b>		
<b>FS6</b>	Percentage of the portfolio for business lines by specific region, size (e.g. micro/SME/large) and by sector.	OMSA does not currently report specifically on this parameter.
<b>FS7</b>	Monetary value of products and services designed to deliver a specific social benefit for each business line broken down by purpose.	While we don't specify the monetary value of this parameter, the parameter is discussed further in the section on Product Access in 'Serving our Customers' on page 26.
<b>FS8</b>	Monetary value of products and services designed to deliver a specific environmental benefit for each business line broken down by purpose.	OMSA does not currently report specifically on this parameter.
<b>Audit</b>		
<b>FS9</b>	Coverage and frequency of audits to assess implementation of environmental and social policies and risk assessment procedures.	We do audit the implementation of the dti Codes of Good Practice in OMSA and this is externally verified. We also request BBBEE certificates from our suppliers for the purposes of improving our preferential procurement (page 73). We also assess various social issues in our risk assessment process. See page 15 for further details.
<b>Active ownership</b>		
<b>FS10</b>	Percentage and number of companies held in the institution's portfolio with which the reporting organisation has interacted on environmental or social issues.	OMSA does not currently report specifically on this parameter.
<b>FS11</b>	Percentage of assets subject to positive and negative environmental or social screening.	While we do conduct appropriately thorough due diligence on our investments, we are not able in all cases to necessarily identify environmental, social and governance issues in a comprehensive way.
<b>FS12</b>	Voting polic(ies) applied to environmental or social issues for shares over which the reporting organisation holds the right to vote shares or advises on voting.	OMSA does not currently report specifically on this parameter.

<b>Product Responsibility</b>		
<b>Customer health and safety</b>		
<b>PR1</b>	Life cycle stages in which health and safety impacts of products and services are assessed for improvement, and percentage of significant products and services categories subject to such procedures.	This parameter is not reported on as it is not deemed to be material to OMSA.
<b>PR2</b>	Total number of incidents of non-compliance with regulations and voluntary codes concerning health and safety impacts of products and services during their life cycle, by type of outcomes.	This parameter is not reported on as it is not deemed to be material to OMSA.
<b>Product and service labelling</b>		
<b>FS15</b>	Policies for the fair design and sale of financial products and services.	This is covered in the section on 'Serving our Customers: Product pricing and Product promotion' on page 40.
<b>PR3</b>	Type of product and service information required by procedures, and percentage of significant products and services subject to such information requirements.	This is covered in the section on 'Serving our Customers: Product promotion' on page 40.
<b>PR4</b>	Total number of incidents of non-compliance with regulations and voluntary codes concerning product and service information and labelling, by type of outcomes.	There have been no incidents of non-compliance in the last financial year.
<b>PR5</b>	Practices related to customer satisfaction, including results of surveys measuring customer satisfaction.	This is covered in the section on 'Serving our Customers: Customer feedback' on page 22.
<b>FS16</b>	Initiatives to enhance financial literacy by type of beneficiary.	This is covered in the section on 'Serving our Customers: Financial education' on page 33.
<b>Marketing and communications</b>		
<b>PR6</b>	Programmes for adherence to laws, standards, and voluntary codes related to marketing communications, including advertising, promotion, and sponsorship.	This is covered in the section on 'Serving our Customers: Product promotion' on page 40.
<b>PR7</b>	Total number of incidents of non-compliance with regulations and voluntary codes concerning marketing communications, including advertising, promotion, and sponsorship by type of outcomes	There have been no incidents of non-compliance in the last financial year.
<b>Customer privacy</b>		
<b>PR8</b>	Total number of substantiated complaints regarding breaches of customer privacy and losses of customer data.	We do not currently report on the actual number of substantiated complaints. We had a 9% decrease in total complaint volumes in 2009 as compared with 2008 volumes.
<b>Compliance</b>		
<b>PR9</b>	Monetary value of significant fines for non-compliance with laws and regulations concerning the provision and use of products and services.	There have been no incidents of non-compliance in the last financial year.