

OLD MUTUAL LIMITED

UNITED NATIONS GLOBAL COMPACT COMMUNICATION OF PROGRESS

2020





"I am pleased to reaffirm Old Mutual Limited's support of the 10 Principles of the United Nations Global Compact (UNGC) in the areas of Human Rights, Labour, Environment and Anti-Corruption."

Iain Williamson

Chief Executive Officer

Old Mutual Limited became a signatory to the UNGC in August 2018 and this is our second annual Communication on Progress to stakeholders covering the period from 1 January 2020 to 31 December 2020.

Old Mutual is a financial services provider anchored in Africa operating in 13 countries on the continent and a niche business in China.

In 2020, we refreshed our business strategy which builds on a strong foundation of

Chief Executive Officer Statement of Commitment

serving customers for more than 175 years, our trusted brand and enviable distribution scale. We considered the environment that we operate in, changing customer needs driven by technology, fierce competition and sustainability in order to stay relevant to all stakeholders in the longer term.

Our strategy is deliberate in building on our foundation by aggressively driving brand differentiation, providing solutions that meet changing customer needs and enabling a seamless transition between face-to-face and digital journeys. We draw on our talented and engaged employees to achieve these aspirations.

We remain mindful of our responsibility to society and the important role we play in ensuring positive futures for our customers and communities.

The refreshed strategy is supported by five interconnected strategic pillars.

These "CARES" pillars are designed to concentrate our attention and efforts on our responsibility to society and the important role we have to play in ensuring positive futures for our customers and communities, while delivering sustainable long-term value for our shareholders.

We believe the successful execution of the five strategic pillars will enable us to be our customers' 1st choice and responsibly build the most valuable business in our industry.

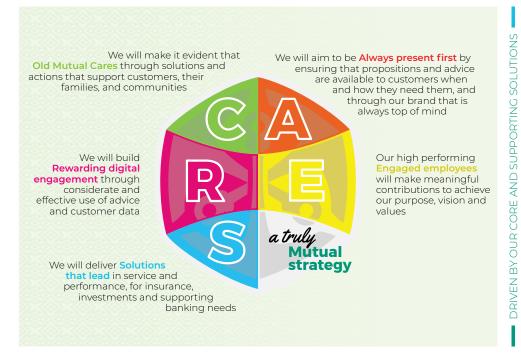
The Old Mutual Cares strategy positions our purpose to "champion mutually positive futures for our customers and stakeholders every day".

WHY DO WE EXIST? **WHERE** DO WE WANT TO BE?

Our purpose is to champion **mutually positive futures** every day.

Our vision is to be our customers'

1st choice to sustain, grow and protect their prosperity.



WHAT WE WILL ACHIEVE

We believe that our delivery on the CARES pillars will enable us to be our customers'

1st CHOICE and responsibly build the MOST VALUABLE BUSINESS
in our industry

Chief Executive Officer Statement of Commitment





Our stakeholder focused approach ensures that we have a common understanding of the areas through which we can make a measurable impact.

Our group-wide responsible business framework co-ordinates action across the following focus areas: Responsible Investing, Environmental Impact, Financial Wellbeing, Skills Development, Education, Diversity and Inclusion and Entrepreneurship.

Through these focus areas, Old Mutual aligns itself as an active contributor to the **Sustainable Development Goals** depicted.

Oversight on alignment and progress in respect of the Group's sustainable social, environmental and economic development commitments is managed by the Responsible Business Board Committee, a sub-committee of our Board of Directors.

The 2020 Old Mutual Limited Integrated Reporting suite, with corresponding supplementary reports, provides more detail on our continued commitment to the 10 Principles of the UNGC. Click here to view the reporting suite.

lain Williamson CEO

























HUMAN RIGHTS

PRINCIPLE 01

Businesses should support and respect the protection of internationally proclaimed human rights.

PRINCIPLE 02

Businesses should make sure that they are not complicit in human rights abuses.





Across the 14 countries in which we operate, we work to entrench and uphold our commitment to human rights principles through our employment policies and practices. This includes a zero tolerance policy on discrimination and a focus on upholding ethical practices across the board.

We work with our clients and suppliers to ensure that human rights best practice is implemented.

We have a range of channels for reporting any suspected breach of, or concern regarding, human rights throughout our operations. These channels include anonymous whistleblowing mailboxes and hotlines, as well as our Human Capital, Responsible Business and Risk functions in each business, who report such incidences to the respective Risk and Audit Committees

Any violations of human rights that are brought to our attention are immediately addressed.

Our code of ethics, the Maadili charter, defines ethical behaviour as following the spirit and intention of the law and treating all our stakeholders fairly and respectfully. It is supported and extended by several policies and contains explicit statements that address human rights issues. Our employees and board of directors confirm their compliance to the Maadili Charter through an annual attestation process.

Our approach and commitment towards the protection of human rights is detailed in our **human rights statement**.

LABOUR STANDARDS

PRINCIPLE 03

Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.

PRINCIPLE 04

Businesses should uphold the elimination of all forms of forced and compulsory labour.



Old Mutual continues to uphold the principle of freedom of association in all the countries across Africa within which we have a presence.

This includes the right to Freedom of Association which is evidenced through the various recognition agreements entered into with trade unions.

The Maadili Charter affirms this right to freedom of association and confirms that collective bargaining is respected, where allowed by law, to facilitate constructive social dialogue.

Old Mutual consults with employees and/ or their representatives on matters related to pay and conditions of employment as required in every jurisdiction where we operate. Legislation related to minimum wage is observed by Old Mutual. Old Mutual does not tolerate forced or compulsory labour in any of our countries of operation and only operates on a voluntary employment basis following the common law principles of offer and acceptance.

Employees are advised of the process to follow should they wish to terminate their relationship with Old Mutual.

We are anchored by our vision to build a high performing workforce through a compelling Employee Value Proposition. Our vision is aligned to the new strategic pillar focused on Engaged Employees.

We believe that engaged and motivated employees that have a deep sense of belonging and connection to our purpose, vision and values will make meaningful contributions to deliver value to ourstakeholders.

Our vision, along with our values, are the cornerstone of our culture, as we shift towards delivering with greater speed, innovation, and agility. Through our engagement surveys, we have received positive feedback from employees with 93% feeling engaged and supported by leaders within the organisation.



LABOUR STANDARDS

PRINCIPLE 05

Businesses should uphold the effective abolition of child labour.

PRINCIPLE 06

Businesses should esnure the elimination of discrimination in respect of employment and occupation.

Old Mutual has a zero tolerance policy on child labour across all the countries in which we operate.

All countries abide by the minimum age of employment legislation. All of our service providers and business partners are required to observe the same legislative principles, including those applicable to the prohibition of child labour.

The anonymous whistleblowing hotline/ service allows for reports of contraventions of any nature to be channelled and dealt with appropriately.



Old Mutual believes a diverse workforce that represents the vibrant communities and countries we operate in, promotes innovation and drives transformational growth.

We advance an inclusive society and workplace aimed at nurturing a sense of belonging and connection.

Old Mutual's Diversity and Inclusion policies aim to eliminate discrimination and our Responsible Business agenda extends this focus into the communities in which we operate.

Diversity, equity and inclusion initiatives are undertaken in all the countries in which we operate in order to ensure that there is a strong focus on addressing the challenges of previously disadvantaged groups specific to those jurisdictions.

In South Africa, where our headquarters are based, we abide by local Employment Equity legislation and have worked towards achieving the targets submitted to the Department of Labour.



The Maadili Charter further confirms our zero tolerance approach to discrimination.

The anonymous whistleblowing hotline/service allows for reports of contraventions of any nature to be channelled and dealt with appropriately.

Our diversity and inclusion impact is detailed in the **2020 Responsible Business Impact Report**.

ENVIRONMENT

PRINCIPLE 07

Businesses should support a precautionary approach to environmental challenges.

PRINCIPLE 08

Businesses should undertake initiatives to promote greater environmental responsibility.

PRINCIPLE 09

Businesses should encourage the development and diffusion of environmentally friendly technologies.

As a Responsible Business, mitigating and adapting to climate change is a priority, and it was a key focus area in 2020.

Across our business we are focussed on reducing our negative impact on the environment through various climate change initiatives.

We have established climate change governance structures and are developing a Climate Change Strategy and Reporting framework aligned to the recommendations of the Task Force on Climate-related Financial Disclosures.

Our Facilities Management team leads progress on reducing our buildings' carbon footprint, water consumption (including making excess supply available to proximate communities), reducing our energy consumption from hydrocarbon sources, and improving the efficacy and efficiency of our waste processes and recycling.

Our own properties and our investment property portfolio form the basis of our Greenhouse Gas Protocol and this is disclosed annually through our Carbon Disclosure Project (CDP) submission.

Based on the nature of our operations, the direct environmental impact of our operations is relatively small. However, by proxy, the most meaningful positive impact that we can have in this area is in how we conduct our investing activities.

Our approach to Responsible Investment is aligned with the United Nations Principles of Responsible Investment (UNPRI) and South Africa's Code for Responsible Investing (CRISA).

We believe that being responsible and active owners of assets drives the kind of change that enhances long-term value. This purpose driven approach to responsible investing

- incorporates three components:
- Integration of material
 Environmental, Social and
 Governance considerations into our
 investment and ownership decisions,
- actively championing for climate change mitigation through Listed Equity Stewardship, and
- innovation of investment products and services that solve for long-term sustainability outcomes.

Refer to our Responsible Investment
Report 2021 and our Old Mutual Alternative
Investments Sustainability Report 2020
for further information on our responsible
investment practices and products.



ANTI-CORRUPTION

PRINCIPLE 10

Business should work against corruption in all its forms, including extortion and bribery.





We remain firm in our commitment to responsible and legal business conduct across all the countries in which we operate and in our efforts to eradicate financial crime from our business.

Various initiatives, controls, and programmes across the Group support this objective.

We have implemented a comprehensive **Anti-Money Laundering Programme**, which includes appropriate due diligence procedures in line with prevailing Anti-Money Laundering as well as anti-bribery and corruption legislation.

This includes the upfront and ongoing screening of new and existing employees, affected

customers, providers, and other key persons in the business.

We have also adopted a risk-based approach as part of our Anti-Money Laundering Programme to ensure that the business responds to all Anti-Money Laundering, bribery, and corruption risks in an appropriate and consistent manner.

The Group has adopted an Anti-Money Laundering policy that governs the Anti-Money Laundering program in line with applicable legislative and regulatory requirements.

The Financial Crime Prevention team is responsible for the implementation of the Fraud Management Programme in the Group and has built a strong and well-established investigatory capability that also supports investigations relating to Anti-Money Laundering, bribery and corruption risks within the business.

In support of our zero-tolerance approach to Anti-Money Laundering, corruption and bribery, appropriate action is taken against any person found to be involved in these activities.

The Financial Crime Prevention team has also established various mechanisms to facilitate anonymous reporting of issues by employees and third parties, which is assessed and investigated by the team directly. This is supported by a Whistle-blowing policy that has been adopted across the Group.

A comprehensive **Fit and Proper assessment process** is in place for the appointment and continued employment of all tied agents and key persons in the Group, taking into consideration the results of sanctions screening, adverse media and the individual's criminal records and employment history.

The Group has adopted a Fit and Proper policy that governs the ongoing effort in line with applicable legislative and regulatory requirements.

In addition to the above programs Old Mutual has also adopted amongst others a Code of Conduct, a Conflict of Interest Policy and a Moonlighting policy that support our efforts around the prevention of bribery.

We provide annual Anti-Money Laundering, corruption and bribery training to all our employees and all employees are required to complete an annual conflict of interest declaration.

The Maadili charter includes attestation to our anti-bribery and corruption policy and our conflicts of interest policy.

