

## Community Investment Policy



We are committed to being an active and supportive member of the community and we strive to ensure that our investment has a sustainable benefit. Our approach to community investment is to support charitable organisations and appropriate NGOs, not only through funding, but also with the experience and expertise of our employees.

We encourage our businesses to establish projects and partnerships around education (particularly financial education) and social welfare.

The full criteria guiding our community investment, and the restrictions we impose, are detailed in our Community Investment Policy, below.

## Community Investment Policy

It is the policy of the Group that each business unit should be an active and supportive member of the communities in which it operates.

### Development of a community investment strategy

Each business unit is required to develop and adopt a community investment strategy using the following minimum standards:

- the strategy should have a strong emphasis on one or more of social and welfare, education (with particular emphasis on financial education) and cultural activities;
- the business unit should take account of the cultural, economic and social needs and sensitivities of the communities in which it operates, as well as its own business objectives;
- the business unit may use cash contributions, cash-in-kind contributions or voluntary time commitment by personnel (each a “Community Investment”) as an investment in the community;
- if it complements the business culture of the business unit, employees should be encouraged to become involved in community investment programmes to deliver added value for both the communities and the employees in terms of personal or professional development;
- as funders, each Business Unit has a responsibility to safeguard the beneficiaries supported through charitable partnerships by ensuring that the charities comply with their legal duties, and take reasonable steps to protect them from harm and minimise the risk of abuse;

- it is necessary to establish that adequate safeguarding policies, procedures and measures to protect people, whether beneficiaries, staff or employees, are in place with each charitable partner;
- wherever possible, community investment projects should enable appropriate skills to be transferred to partnering organisations to help expand their capabilities; and
- the strategy should take account of the broader reputational impact on the Group.

Any community investment strategy adopted by a business unit may contain further provisions, provided that these are not inconsistent with this Policy.

### **Community investments not permitted**

The following community investments are not permitted:

- those prohibited by law or regulation;
- those not permitted under the Political Donations Policy;
- those to a religious organisation whose principal aim is to propagate a particular faith or belief;
- those directly to an individual, unless through or closely linked to a permitted third party organisation as defined through this policy; and
- those to any non-charitable organisations unless for charitable purposes.

### **Records and reporting**

Business units should aim to identify and report on measurable outcomes.

Business units must maintain careful records of the recipient, amount and date of each Community Investment it makes.

### **Review of long-term investment partnerships**

Long-term community investment partnerships should be reviewed at least every three years against the business unit's original and current community investment strategy, the fit with the business unit's business objectives, and to ensure that any Community Investment is enhancing the skills of the partner organisation.

### **Central disaster relief fund**

A central disaster relief fund is maintained to be used in support of communities within the countries in which we have operations. Any distribution from this fund is at the discretion of the owner of this Policy in discussion with relevant colleagues.