



Title	Group Community and Charitable Policy Statement
Owner	Group Head of External Communications
Key Contact	Corporate Responsibility Manager
Version Number	1.00
Document ID	N/A
Primary Audience	Employees and charities

The objective of this policy is to set a framework for charitable giving and community action for RSA Group.
It aims to define best practice giving and themes which are relevant to RSA.

A. Context

1. Introduction

Being a responsible business is all about engaging with stakeholders and this applies equally to our communities. Our community programme is about giving something back, helping people in need and supporting customers' and employees' local communities.

Our priority focus areas which all have a link with insurance are:

- Safety
- Social Inclusion (e.g. education, youth, financial inclusion, etc.)
- Environment

2. Scope

This Policy applies to all RSA operations, including wholly or majority owned subsidiaries and associated companies where RSA has management control.

3. Out of Scope

Once a charitable donation of over £25k (GBP) has been approved by the Group Corporate Responsibility Manager, a repeat donation to the same organisation of the same amount or less in subsequent years does not

require approval again.

We are unable to support any organisation which supports one specific religious faith, armed forces (except time-off for public duties), political parties, sports (unless compelling community justification), arts (unless supporting disadvantaged groups) or individual sponsorships.

4 Risk Appetite Alignment

- The Group has no appetite for material breaches, significant fines and other enforcement actions

B. Mandatory Requirements

5. Policy Requirements

Statement of Principles

What areas we support

RSA supports priority focus areas which all have a link with insurance, namely:

- Safety
- Social Inclusion (e.g. education, youth, financial inclusion, etc.)
- Environment

These focus areas act as a guide but regional variations are acceptable as long as a direct link to the business exists.

What we don't support

We are unable to support any organisation which supports one specific religious faith, armed forces (except time-off for public duties), political parties, sports (unless compelling community justification), arts (unless supporting disadvantaged groups) or individual sponsorships.

Direct financial support

RSA will provide direct financial support only if one or all of the following conditions is satisfied:

- The scope falls under one of the priority focus areas or regional variations
- Actively involves RSA employees volunteering
- Part of wider active partnership

Volunteering

RSA will actively encourage employees to volunteer for RSA corporate led events during work time. RSA operates a flexible policy for time off for volunteering which varies by region but recommends a two day allowance per year.

Payroll giving

RSA (where systems permit) will operate local payroll giving schemes for current employees which allows matched funding in a tax efficient way.

Matched funding

RSA will provide capped matched funding for employee fundraising initiatives each year (nationally set amount). Matched funding is not available for external parties or friends and family of employees and priority should be given to fundraising relating to the three priority focus areas.

Gifts in Kind

RSA employees and business units are encouraged to provide a range of donations and 'in-kind' services each year around the Group utilising business skills, expertise and resources.

6. Responsibilities

Management of each of our operating units around the world is responsible for conducting the business in a manner consistent with this Group Statement.

The **Chief Executive/Managing Director** of each Region and Country **must** ensure that:

- a.) an active community programme is available for their employees in accordance with statement of principles.
- b.) any donations (or multiple donations to a single organisation in a year) over £25k (GBP) receives prior approval from the Group Corporate Responsibility Manager as specified in the Delegated Authority Policy.
- c.) any donations outside priority focus areas under £25k (GBP) receives prior approval from the Group Corporate Responsibility Manager as specified in the Delegated Authority Policy or specified contact in section D.
- d.) accurate measurement of financial and non-financial support is carried out on an annual basis and a consolidated list of community activity and charitable giving is provided to the Group Corporate Responsibility Manager. This will be audited at year end to ensure compliance.

Corporate Responsibility Managers/CR Representatives/Charity Committees within each Region/Country are responsible to their Chief Executive/Managing Director for coordinating Community activity and **must** ensure that for their own area of responsibility:

- a) an active community programme focusing beyond direct financial support is operated and publicised.
- b) the community programme is open to all employees and appropriately branded materials are provided.
- c) all event/activity organisers understand the requirement for a risk assessment to be carried out prior to any volunteer event and approved by national health & safety function.
- d) feedback is actively canvassed from employees and charitable partners.
- e) any donations (or multiple donations to a single organisation in a year) over £25k (GBP) receives prior approval from the Group Corporate Responsibility Manager as specified in the Delegated Authority Policy.
- f) any donations outside priority focus areas under £25k (GBP) receives prior approval from the Group Corporate Responsibility Manager as specified in the Delegated Authority Policy or specified contact in section D.
- g) a consolidated report of community support is provided to Group on an annual basis including: financial donations, employee raised funds, volunteer numbers, volunteer hours and value of gifts in kind. This will be audited at year end to ensure compliance.
- h) good communication with operational planning and HR is maintained for event planning.
- i) the external facing policy in Appendix A is published on local internet site or linked to corporate website Corporate Responsibility webpage.

- j) link local intranet site to Group Risk policy site, Group Corporate Responsibility site and include any supporting information.

Managers *must* ensure that:

- a) employees are allowed to volunteer for corporate led events of up to two days per year with adequate warning and sufficient cover to ensure minimal business impact.
- b) any donations or payments made to charities, community groups or other similar organisations are logged on the SAP system as charitable donation with notification to local CR representative. This will be audited at year end to ensure compliance.
- c) any charitable donation (or multiple donations to a single organisation in a year) over £25k (GBP) must receive prior approval from GCC as specified in the Delegated Authority Policy.
- d) any donations outside priority focus areas under £25k (GBP) receives prior approval from the Group Corporate Responsibility Manager as specified in the Delegated Authority Policy or specified contact in section D.

Human Resources Managers *must* ensure that:

- a.) employee volunteering is encouraged and that annual leave is not required to be taken for RSA corporate led events (and be communicated to line managers).
- b.) ensure any time off policy incorporates a set amount of time for RSA employees to volunteer.

Employees *must* ensure that:

- a.) when requesting time off for volunteering employees should give managers advance warning, be aware of any business impact and be prepared to compromise. Time off for volunteering is always subject to their managers prior consent.
- b.) when volunteering employees should conduct themselves as ambassadors to the company at all times in accordance with the business principles and brand beliefs.

C. Supporting Materials

Material	Source
Group Corporate Responsibility Policy	Web link tbc
RSA Corporate Responsibility Report 2007	http://rsaworldwide/Intranet/singlecont.nsf?OpenDatabase&home=CR
RSA Corporate Website Corporate Responsibility Homepage	http://www.rsagroup.com/rsa/pages/responsibility
Conflicts of Interest	Group policies intranet site
Third Party Contracts	Group policies intranet site
Anti-corruption	Group policies intranet site

D. Contact Points for Queries or Guidance:

Group Corporate Responsibility Manager James Wallace 0207 111 7289

Email: CorporateResponsibility@RoyalSunInt

Local Corporate Responsibility contacts are available on the Group Corporate Responsibility Intranet (see link above) and in Annual Corporate Responsibility Report (see link above).

Version Control/History

Version No.	Author	Approval Date	Effective Date	Status/Comments
1	JW			

Appendix A – External Policy Statement

RSA Community Policy Statement

Background

Being a responsible business is all about engaging with stakeholders and this applies equally to our communities. Our community programme is about giving something back, helping people in need and supporting customers' and employees' local communities.

Scope

Management of each of our operating units around the world is responsible for conducting the business in a manner consistent with this Group Statement. This policy applies to all employees and operating units.

What areas we support

RSA supports the following priority focus areas which all have a link with insurance, namely:

- Safety
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Andy Haste – Group CEO

(Next review date: 5/8/2009)