



Title	Group Environmental Policy Statement
Owner	Head of Group External Communications
Key Contact	Corporate Responsibility Manager
Version Number	1.00
Document ID	N/A
Primary Audience	All employees

The objective of this Policy is to minimise the environmental impact of RSA. It aims to provide a consistent framework for operating units to report on and measure environmental improvement across the Group.

A. Context

1. Introduction

RSA recognises that activities in general insurance have some impact on the environment. We believe that our performance as a well recognised insurer, operating in 28 countries, will be measured not only by our profitability as a business but also our impact on the environment.

As a major insurer of commercial, industrial and individual risks, we have the opportunity to use advanced underwriting and risk management techniques to help our clients minimise the risk of incidents, which adversely impact the environment. We seek to provide advice to customers and lobby on material issues for improved environmental standards.

2. Scope

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

For offices over 100 full-time equivalent employees it is compulsory to adhere to the policy statement.

For offices of 50-100 full-time equivalent employees it is expected that they will move towards compliance with the policy statement.

3. Out of Scope

It is understood that for some smaller offices of under 50 full-time equivalent employees may not have the resources (either on-site or at a national level) to adequately supply environmental data to group. All offices of fewer than 50 FTEs should discuss the degree of applicability of this policy with contacts in section D.

4 Risk Appetite Alignment

The Group has no appetite for poor environmental practices which may lead to adverse environmental impacts.

B. Mandatory Requirements

5. Policy Requirements

Statement of Principles

- RSA will strive to continually improve environmental performance in our operations and prevent pollution of land, air and water. All applicable RSA offices and major sites will report on a quarterly basis using the RSA group system to provide full and accurate disclosure on the following business impacts:
 - Energy consumption (all forms)
 - Water consumption
 - Paper use
 - Avoiding disposal and increasing reuse and recycling of waste
 - Business travel
 - Climate change related emissions
- Countries will provide annual updates and set quantifiable time-limited targets and objectives relating to the above impacts annually. These will be monitored and published externally in the annual report & accounts, corporate responsibility report and corporate website.
- All data and targets will be externally verified annually. Progress against this statement for all operating countries will be reviewed twice yearly by the Group Executive Committee and annually by the Board.
- New premises and major refurbishments should incorporate best practice environmental standards of construction and design, e.g. BREEAM, LEED, or equivalent.
- RSA will seek to comply with applicable legal requirements and to any other requirements (e.g. ClimateWise) to which RSA subscribes relating to the environment impacts and aspects by way of annual review.
- RSA will work with material suppliers to reduce the environmental impact of products and services while seeking environmentally preferable ones. RSA expects material suppliers to work towards the minimisation of environmental impact and be able to demonstrate progress.
- We will seek to foster a sense of engagement and ongoing dialogue within our sector and to other stakeholders promoting debate while keeping them updated on our progress as appropriate.
- RSA will seek to take into account environmental issues when developing products and services.

6. Responsibilities

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

- a) Annual targets and objectives for environmental improvement are set and progress reported to Group.

Corporate Responsibility Managers (or relevant professional with responsibility for coordinating within each Region/Country) are responsible to their Chief Executive/Managing Director for coordination of environmental monitoring. Managers *must* ensure that for their own area of responsibility:

- a) there is liaison between local facilities management, travel managers, finance and procurement with a view to monitoring stated impacts.
- b) targets and objectives are set in conjunction with local parties and approved by both regional/national CEO and GCC CR Manager.
- c) quarterly data is supplied to GCC for accurate monitoring and early warning of any deviation from set targets & objectives.
- d) local environmental legislation is complied with.
- e) the external facing policy in Appendix A is published on local internet site or link to corporate website CR homepage.
- f) publish Corporate Responsibility information on the local intranet site linked to this policy on the Group risk policy site and Group Corporate Responsibility site.
- g) internal communication is carried out throughout the year to help achieve targets and objectives and to allow employee input into environmental management.

The **Facilities Manager (or other relevant manager of environmental impact)** *must* ensure that:

- a) major suppliers of services or products which may have environmental impacts have early warning to provide data as specified in RSA Group reporting system.
- b) where accurate data measurements are not available, estimates are provided including assumptions made.
- c) in conjunction with external suppliers and their functions, work towards reporting indicators as requested by GCC via reporting system to comply with international best practice.
- d) they work with CR Manager (or relevant professional) in assessing local legislative requirements and engagement of employees.
- e) Provide early warning of potential failure to achieve their assigned targets to the local CR manager.

C. Supporting Materials

Material	Source
Group Corporate Responsibility Statement	(Subject to approval by Group Executive Committee)
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

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 Environmental Policy Statement

Background

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Andy Haste – Group CEO

(Next review date: 5/8/2009)