

Sanlam Group Occupational Health and Safety Policy

Type of Policy	Sanlam Group Policy
Sanlam Entities subject to this Policy	Sanlam Group
Area of Governance	Occupational Health and Safety
Approving Authority	The Board of Sanlam Limited
Group Exco Sponsor	Group Finance: Group Financial Director
Responsible Person	Head: Sanlam Facilities and Real Estate
Date of First Approval	07 June 2023
Frequency of review or update	Annually
Date of next review	01 May 2025
Version number	Two
Related Policies:	Sanlam Group Governance Policy Occupational Health and Safety Policy (Remote work) Hybrid Work Policy Cluster Flexible Working Business Continuity Plans Code of Conduct



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1. Policy Purpose

The purpose of the Sanlam Group Occupational Health and Safety (OHS) policy is to set minimum tight principles to govern all stakeholders to create and sustain a healthy, safe and risk-free environment for all employees, contractors, and clients in line with in-country legislation. It also provides the framework to govern, monitor and enable reporting of OHS compliance and adherence to reporting requirements of the Sanlam Group Social, Ethics and Sustainability (SES) Committee.

2. Policy Statement

The Sanlam Group (“Sanlam”) is committed to providing and maintaining safe working conditions for its employees, contractors and clients in all of the offices from which the business of Sanlam is conducted.

Sanlam is committed to promoting positive mental, physical and social well-being within the organisation.

Executives and all other persons in positions of authority within Sanlam must take all such steps as may be reasonably required and necessary to provide and maintain safe workplaces and offices for Sanlam employees, clients and contractors.

Management must keep all employees and contractors informed of potential dangers that exist or may arise in respect of occupational health and safety within the offices and workplaces of Sanlam. Concise and timely communication is therefore important. Information, education, training and supervision for the purpose of maintaining a safe workplace must take place regularly.

Sanlam will proactively take all reasonable measures to identify, assess and mitigate all unhygienic and unsafe situations that could result in unnecessary incidents or disruption of work.

Sanlam will continuously engage in consultation with all stakeholders to ensure that safe working conditions are provided and maintained in the manner foreseen in this statement.

3. Scope

This policy applies to all Sanlam Group Companies as well as all permanent and contract employees, contractors and clients. Compliance to OHS is compulsory across the Sanlam Group Companies whose Boards and Management structures will ensure OHS compliance. Sanlam Group employees shall assume responsibility for aspects and objectives of OHS within their respective areas. Sanlam Facilities and Real Estate (SFRE) will assist Sanlam Group Companies with assessment processes and reporting OHS compliance to the SES Committee on their behalf.



4. Definitions

Terminology used in this Policy is as defined in Annexure A.

5. Procedure for Implementation

- 5.1 The EXCO of Sanlam and each Group Company shall demonstrate leadership and commitment in respect of this Policy, the requirements of the SES Committee and the Sanlam Group CEO OHS Policy Statement.

The Sanlam Group Companies and Business Clusters must adhere to the following on a quarterly basis:

- 5.1.1 Confirm compliance of their respective Business Clusters by ensuring the completion of an OHS self-assessment questionnaire as provided by SFRE in Table 1.
 - 5.1.2 Business Clusters must ensure appropriate OHS Compliance mitigation plans are in place for high probability and high impact OHS risks.
 - 5.1.3 Each Business Cluster must submit a quarterly OHS compliance report to SFRE. SFRE to report on each Business Cluster's compliance to the SES Committee on a quarterly basis.
- 5.2 Each Business Cluster is accountable to establish a governance structure, which shall show who is responsible for:
- 5.2.1 The implementation of OHS governance, reporting and communicating of OHS matters.
 - 5.2.2 Monitoring OHS opportunities, performance, and risk mitigation.
 - 5.2.3 Leading OHS continuous improvement plans, and
 - 5.2.4 Ensuring the necessary OHS training in line with in-country legislation and/or best practices.

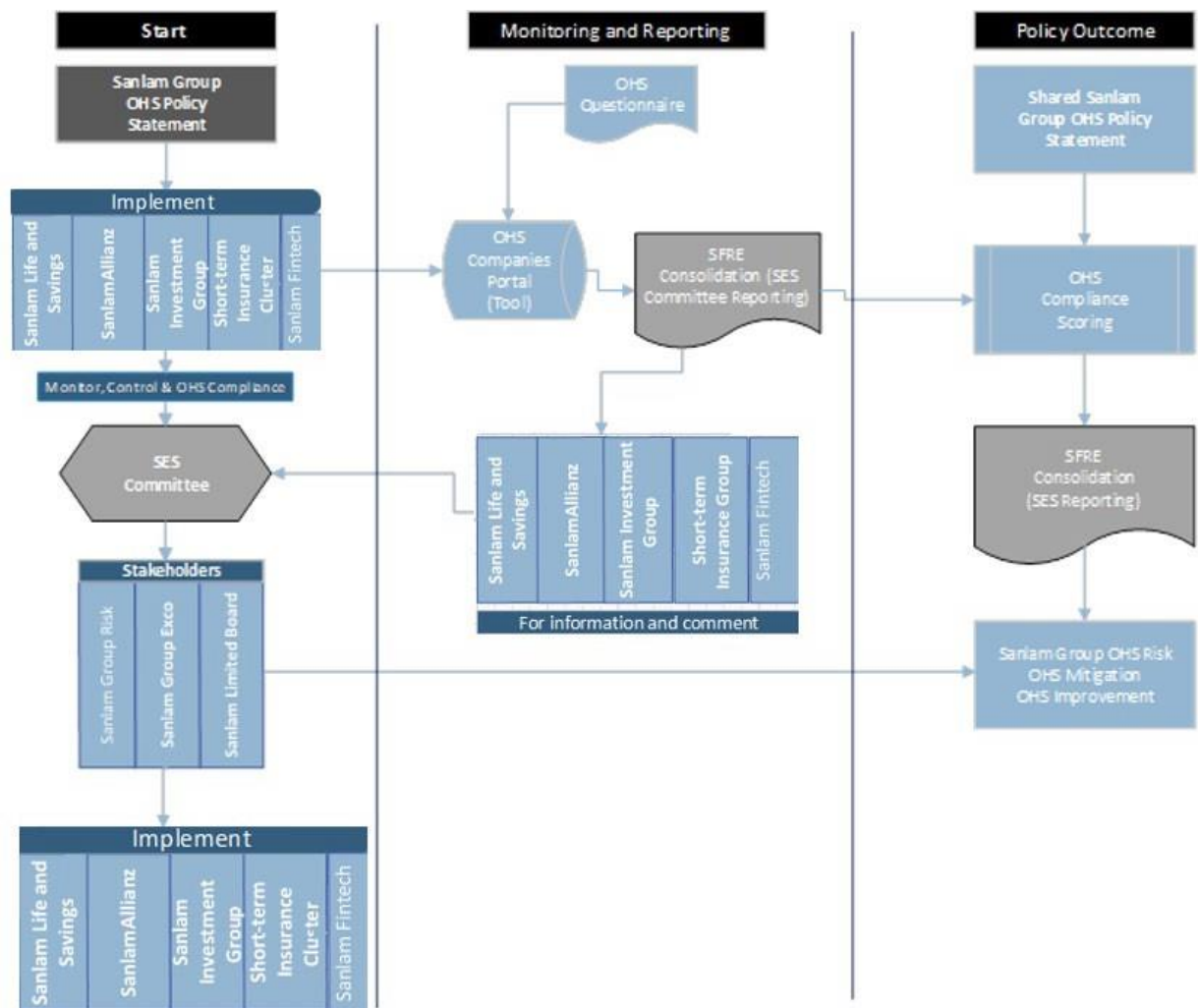
6. Monitoring Compliance with the Policy

- 6.1 All Sanlam Group Companies and Business Clusters shall document baseline risk assessments taking into consideration prevailing hazards, OHS risks and opportunities, legal and other requirements.
- 6.2 The Sanlam Group Companies and Business Clusters must be able to demonstrate their OHS compliance and verification of the OHS compliance report they have submitted to SFRE.



7. Reporting on the Policy Outcome

The figure below shows the basic process in helping to identify OHS risks and gaps in the business environment.



In line with the SES Committee mandate and the Sanlam Group OHS Policy Statement, the minimum OHS compliance key indicators were established to measure, and test OHS Compliance across the following key focus areas:

- People
- Workplace and Equipment
- Environment
- System



The Sanlam Group Companies and Business Clusters are required to complete an OHS self-assessment questionnaire as per the table below:

OHS self-assessment questionnaire (Table 1)

Category	Question	Yes	No
PEOPLE			
	Does your Group Company or Business Cluster have an officially nominated OHS representative for all your workplaces?		
	Does your Group Company or Business Cluster's employees regularly receive OHS training to deal with OHS emergencies and first aid?		
	Does your Group Company or Business Cluster have an OHS governance structure?		
	Does your Group Company or Business Cluster keep all records of injuries & illnesses electronically and on hard copy?		
	Does your Group Company or Business Cluster have a documented process for employees to report unsafe working environment conditions?		
WORKPLACE & EQUIPMENT			
	Does your Group Company or Business Cluster have emergency and evacuation plans displayed in your workplaces?		
	Does your Group Company or Business Cluster plan, conduct and document workplace evacuation drills?		
	Does your Group Company or Business Cluster have appropriate signage for evacuation routes, fire equipment, assembly points and first-aid stations for all your workplaces?		



Category	Question	Yes	No
	Does your Group Company or Business Cluster keep a record of the statutory building certifications and permits across all your workplaces?		
	Does your Group Company or Business Cluster have sufficient first-aid equipment for your employees across all your workplaces?		
	Does your Group Company or Business Cluster verify the condition of the emergency and fire-fighting equipment regularly?		
ENVIRONMENT			
	Does your Group Company or Business Cluster conform to minimum ventilation and lighting requirements for all your workplaces?		
	Does your Group Company or Business Cluster provide your employees with personal protective equipment?		
	Does your Group Company or Business Cluster conduct regular environmental assessments for your workplaces and keep required documentation?		
SYSTEM			
	Does your Group Company or Business Cluster have an OHS Risk Register for all your workplaces?		
	Does the Senior Management team review OHS compliance of your Group Company or Business Cluster at least once per annum?		



8. Enforcement and Remedial Actions

All Sanlam Group Companies and Businesses Clusters will remain responsible and accountable to comply with the OHS Policy Statement, to develop mitigation plans for the identified risks, to eliminate hazards, implement controls and maintain processes, and to execute remedial action.

Sanlam Group Companies and Business Clusters shall establish, implement, and maintain processes needed to prepare for and respond to emergency situations.

The Business Cluster CEO must officially nominate a designated OHS representative to ensure and inform a quarterly OHS compliance report to SFRE for purposes of submission to the SES Committee.

The report must enable the SES Committee to ascertain the overall OHS compliance per Sanlam Group Company and Business Clusters.

9. Revision History

Date	Version	Document status	Revision Tracking Notes
04/2024	2	Updated	Replaced reference to SEM with SanlamAllianz in section 7 and Annexure A. Updated Annexure A – Business Clusters - included Sanlam Fintech Cluster. Updated Annexure A – Business Clusters – Replaced Sanlam Personal Finance Cluster with Sanlam Life and Savings Cluster and removed Sanlam Corporate Cluster.



Annexure A

Sanlam	The Sanlam Group
Sanlam Group	Sanlam Limited and all Group Companies comprise the Sanlam Group.
Sanlam Group Companies	Group Subsidiaries and Group Associates collectively comprise Sanlam Group Companies. Portfolio Investments are not seen as a Group Company.
OHS Objective	An objective set by Sanlam to achieve specific results consistent with the Sanlam Group OHS Policy.
OHS Risk	A combination of the likelihood of the occurrence of a work-related hazardous event(s) or exposure(s) and severity of injury or ill health that can be caused by event(s) or exposure(s).
OHS Opportunity	Circumstances or set of circumstances that can lead to improvement of OHS performance.
Workplace	A place under the control of Sanlam or a Group Company where a person needs to be or go for work purposes.
Contractor	An external individual or organisation providing services to Sanlam or a Group Company in accordance with agreed specifications, terms, and conditions.
Business Clusters	<p>The grouping of businesses controlled by a separate board of directors and with their own governance structures who report directly to the Sanlam Limited and Sanlam Life Boards. Currently this includes:</p> <ul style="list-style-type: none">• Sanlam Life and Savings Cluster• Sanlam Investment Group Cluster• SanlamAllianz Cluster• Sanlam Fintech Cluster• Santam
Portal	Refers to the Sanlam Group tool or any other appropriate reporting mechanism utilised within the specific Sanlam Group Company portal.
Group Exco	The Sanlam Group Executive Committee
Business Exco	The Executive Committee of a Business Entity



Exco	The Group Exco, Sanlam Life Manco, Cluster Exco's and Business Exco's collectively unless specifically indicated otherwise.
Sanlam Group Governance Policy	The policy that establishes "tight" group governance areas to be adhered to by all Sanlam Group Companies and includes the Sanlam Code of Ethical Conduct, the Sanlam Business Philosophy, and the Board Approval Framework.