

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	Biennially
Date of next review	01 May 2027
Version number	Three
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 principles to govern all stakeholders to create and sustain a healthy and safe 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.

Sanlam 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.

Sanlam Management must keep all employees and contractors informed of potential dangers that exist or may arise with respect to 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 in line with in-country legislation.

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

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

3. Scope

This policy applies to all Sanlam Business Clusters as well as all permanent and contract employees, contractors and clients. Compliance to OHS is compulsory across the Sanlam Business Clusters 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 Business Clusters where required 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 Business Cluster shall demonstrate leadership and commitment in respect of this Policy, the requirements of the Sanlam Group SES Committee and the Sanlam Group CEO OHS Policy Statement.

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

5.1.1 Confirm OHS compliance of their respective Business Units.

5.1.2 Business Clusters must ensure appropriate OHS Compliance mitigation plans and have Business Continuity Management Plans in place for high-probability and high-impact OHS risks.



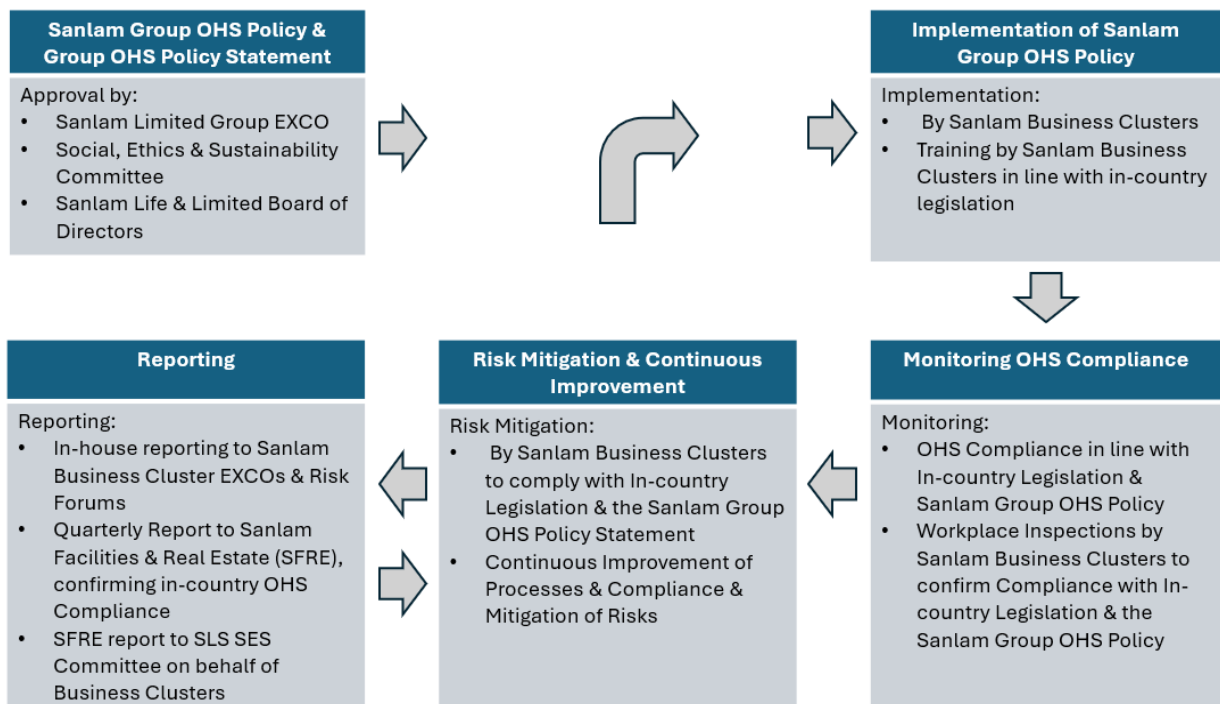
- 5.1.3 Each Business Cluster must submit a quarterly OHS compliance report to SFRE in time to report to the Sanlam Group SES Committee and confirm compliance with in-country legislation. SFRE is to report on each Business Cluster's compliance to the SES Committee quarterly.
- 5.2 Each Business Cluster 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 and the appointment of the persons responsible for OHS roles per in-country legislation.
- 5.2.2 Monitoring OHS opportunities, performance, and risk mitigation implementation.
- 5.2.3 Implementation of leading OHS continuous improvement plans, and
- 5.2.4 Ensuring regularly required OHS training in line with in-country legislation and/or best practices.

6. Monitoring Compliance with the Policy

- 6.1 All Sanlam Business Clusters shall document baseline risk assessments taking into consideration prevailing hazards, OHS risks and opportunities, legal and other requirements.
- 6.2 The Sanlam 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 must measure, and test OHS Compliance across the following key focus areas:

- People, Training and Awareness
- Workplace and Equipment
- Working Environment
- Portals and Reporting
- Risk Mitigation and Continuous Improvement

8. Enforcement and Remedial Actions

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

Sanlam Business Clusters shall establish, implement, and maintain processes needed to prepare for and respond to emergencies.

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

The OHS compliance report must enable the Sanlam Group SES Committee to ascertain the overall OHS compliance with in-country legislation per Sanlam 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.
04/2025	3	Updated	Index Updated. 2. Sanlam Group Companies replaced with Sanlam Business Clusters. 5. Procedure for Impementation – Reference to Table 1 removed. 7. Reporting on the OHS Policy Outcome – Process updated and simplified. Table 1 removed – in-country Legislation to take preference. Annexure A – Business Clusters updated



Annexure A

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 the following Clusters:</p> <ul style="list-style-type: none">• Sanlam Life and Savings• Sanlam Fintech• SanlamAllianz• Sanlam Investment Group• Sanlam Asia• Short-term Insurance• Sanlam Group Office
Business Exco	The Executive Committee of a Business Entity
Contractor	An external individual or organisation providing services to Sanlam or a Business Cluster Group Company in accordance with agreed specifications, terms, and conditions.
Exco	The Group Exco, Sanlam Life Manco, Cluster Exco's and Business Exco's collectively unless specifically indicated otherwise.
Group Exco	The Sanlam Group Executive Committee
OHS Objective	An objective set by Sanlam to achieve specific results consistent with the Sanlam Group OHS Policy and the Policy Statement.
OHS Opportunity	Circumstances or set of circumstances that can lead to improvement of OHS performance.
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).
Portal	Refers to a Sanlam Group tool or any other appropriate reporting mechanism utilised within the specific Sanlam Business Cluster Group Company portal.
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.
Sanlam Group Governance Policy	The policy that establishes 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.
Workplace	A place under the control of Sanlam or a Business Cluster Group Company where a person needs to be or go for work purposes.