

POLICIES AND PRACTICES

HR policies and practices

At Investec we believe in cast iron integrity in all internal and external dealings, consistently and uncompromisingly displaying moral strength and behaviour which promotes trust.

The policies and business practices of Investec are outlined in *BAWI (Becoming Acquainted with Investec)* and in the compliance handbook. They are intended to guide employee conduct and ensure that at all times employees actions and attitudes reflect the group's values and philosophies. We have also published a public document that is called *The way we do business* that highlights elements of our code of conduct.

Below is a list of some of the policies in this regard:

- AIDS policy
- Cellphone scheme
- Disability procedure
- Discrimination and harassment policy
- Dressing for your day
- Employee integrity policy
- FAIS – Rendering financial advisory intermediary services to clients
- Financial markets code of conduct
- Flexible work practice policy
- Grievance resolution policy
- Health and safety policy
- IT acceptable usage policy
- Learning and development at Investec
- Leave scheme
- Maternity scheme
- Motor vehicle scheme
- Motor accident claims practice
- Other benefits granted to employees
- Retirement policy
- Retrenchment policy
- Security and access control policy
- Substance abuse policy
- Transfer policy – local

- Travel scheme – local
- Travel scheme – international
- Whistle blowing and protected disclosures policy.

Compliance policies

We have the following compliance policies in place:

- Allocations policy
- Anti-bribery and anti-corruption policy
- Anti-money laundering and counter of terrorist financing policy and standard
- Breaches policy
- Business introducer policy
- CASS breaches and policy
- Chinese walls confidential information and wall crossing policy
- Client communications and financial promotions policy
- Compliance framework
- Compliance handbook
- Complaints manual
- Compliance monitoring standard
- Compliance/dispute policy
- Conduct risk policy
- Conflicts of interest and market abuse policy
- Data protection
- Employee participation policy
- Fraud policy
- Gifts and entertainment (SA) policy
- Gift, hospitality and charitable spend policy (UK)
- Guidelines to Investec policies
- Inducements policy
- Investment recommendation policy
- Market abuse policy
- Market rumours policy
- Market sounding policy
- Media queries policy

- Operational resilience statement
- Order and best execution policy
- Outside business interests policy
- Promotion of Access to Information Act (PAIA) manual
- Personal account dealing policy
- Records retention policy
- Sanctions policy
- Senior managers handover policy
- Remote trading policy
- Terms of reference policy (compliance function)
- Training and competency policy
- Vulnerable clients policy.

Environmental policies

We recognise that effective environmental management is an essential part of embedding this philosophy into the organisation and are therefore committed to operating an effective environmental management system compliant with King IV in South Africa and ISO 14001 in the UK head office.

The management system is initially focused on the activities and operations of supporting functions which have a direct environmental impact.

We have the following policies and statements in place:

- Group environmental policy and climate change statement
- Group procurement statement
- Environmental and social risk practices in lending and financing activities policy
- Environmental and social risk practices in investment activities policy
- Group fossil fuel policy.