



ENVIRONMENTAL AND SOCIAL SUSTAINABILITY POLICY

BRITAM GROUP

Policy Owner: Group Chief Risk & Compliance Officer
Date: March 2017

1. Purpose

Britam recognizes that its operations can have direct and indirect impacts on the environment and the communities in which it operates. The company's objective is to responsibly manage the environmental and social risks associated with its operations in order to minimize impacts on the environment and our stakeholders, and to enhance long term returns to our shareholders.

In order to communicate this philosophy to its stakeholders and shareholders, the Board of Directors of Britam have adopted this ***Environmental and Social Sustainability Policy*** which describes the company's commitment to sustainable finance as an integral component of responsible corporate governance.

2. Scope of the Policy

This ***Environmental and Social Sustainability Policy*** applies to all Britam subsidiaries, and business units. The policy shall be under the administration of management through the office of the Group Chief Risk & Compliance Officer.

3. Policy Statements

- 3.1. Britam is committed to conducting its own business in an environmentally and socially responsible manner.
- 3.2. In maintaining international best practice in environmentally and socially responsible manner, we are committed in assisting our customers to also fulfil their environmental and social responsibilities.
- 3.3. We recognize that identifying and quantifying environmental and social risks should be part of the normal process of risk assessment. To this end we will systematically assess the environmental, social, labor, occupational health and safety risks associated with our clients.
- 3.4. With regard to our customers, we regard compliance with applicable environmental, health and safety and labor regulations and the use of sound environmental, health and safety and labor practices as important factors in demonstrating effective corporate governance. We will endeavor to assist our clients to maintain the relevant environmental and social standards. Our benchmarks are:
 - 3.4.1. Relevant local legislation, in particular the Environmental Management and Coordination Act (ECMA), 1999 and the Occupational Health and Safety Act, 2007.
 - 3.4.2. The Environmental and Social Policies and Guidelines of the World Bank Group and in particular the IFC Performance Standards on Environmental and

Social Sustainability

- 3.5. We will not carry on business with an entity involved in activities or projects on the IFC Exclusion List (see section 7.1 for the Exclusion List).
- 3.6. We will seek to ensure the efficient implementation of this **Environmental and Social Sustainability Policy** through an Environmental and Social Management System (ESMS). This ESMS will include sound objectives, well defined procedures and responsibilities that will help our efforts in ensuring that all activities / projects are carried out in compliance with the applicable requirements on an ongoing basis.
- 3.7. We will ensure transparency in our activities and ensure that the above mentioned commitments are visibly placed on our website and reflected in our annual reports.
- 3.8. We will ensure that the staff, management and shareholders of Britam and our clients and suppliers understand the policy commitments made by Britam in this area.
- 3.9. As a good corporate citizen, we shall work in coordination with all the companies in the Britam Group to identify and promote suitable social and environmental programs beneficial to our communities.