Link Group Sustainability Policy

August 2020

Document Name:	Link Group Sustainability Policy
Policy Category:	Governance
Approver:	Board
Executive Sponsor:	Chief People & Group Services Officer
Policy Owner (Author):	Senior Sustainability Manager
Approval Date:	25 August 2020
Review Frequency:	Generally, every two years unless required more frequently
Last Review Date:	August 2020
Next Review Date:	May 2023
Contact for Questions:	Senior Sustainability Manager
Information Security Document Classification	Public *Refer to the Link Group Information Classification and Handling Policy*

1. What is this policy?

Link Group is committed to conducting business in a sustainable manner that minimises the impact on the surrounding community and environment. This includes an appropriate balance of environmental, social and economic demands with sustainable success being built on a foundation of responsible business practices.

The **Sustainability** Policy (Policy) supports the Code of Conduct and Ethics that sets the standards for the way we work at Link Group.

Words in bold have the meaning stated in Section 8 (Definitions) and appear in bold when first used.

2. Why do we need this policy?

As a global organisation, Link Group's sustainability strategy supports our business to help build a responsible future. We strive to act responsibly to shape a better future, support our clients, contribute to employee well-being, diversity and inclusion, and deliver mutual business and social benefits in the communities we operate in.

Our Sustainability and CSR strategy (Strategy) supports Link Group's purpose through being a responsible business that safely and securely connects people with their assets.

Our strategy is comprised of three core pillars.

1. A Responsible Business: This pillar focuses on governance, ethics and respect for human rights that we adopt in our approach to all aspects of our business, including our general operations, information security, privacy, business continuity and supplier management. We are also committed to acting responsibly with regards to the impact our operations have on the environment to help build a sustainable future.

2. Aligning and building our Capability: Our second pillar captures the continued investment we are making in our people and our systems to deliver global client solutions. This includes supporting employee wellbeing, development, engagement, career progression, collaboration, **diversity**, **inclusion** and **gender equity**.

3. Sustainable Growth: Our third pillar demonstrates how Link Group builds a sustainable future by continuing to innovate and create new solutions for our clients. We invest in technology and platforms to deliver superior technology-enabled administration solutions, continue to identify ways to reduce our carbon footprint and positively contribute to our communities.

Link Group has aligned its strategy to the **United Nations Sustainable Development Goals** (SDGs) prioritising four goals to contribute to progressing. These are Goal 4: Quality education, Goal 5: Gender equality, Goal 8: Decent work and economic growth, and Goal 13: Climate action.

Our global CSR strategy LinkTogether for Good, supports a global cause, being education for disadvantaged and vulnerable people in our communities. This aligns all of Link Group towards a common cause that has flexibility to suit local interests while increasing our impact and reach.

This Policy aims through its implementation to:

- identify ways to improve our environmental performance

- continue to innovate and create new solutions for clients

- operate ethically and support human rights

- ensure inclusion and gender equity for our people

- invest in our people's development and support their well-being; and

- deliver mutual business and social benefits in the communities we operate in.

3. Who does the policy apply to?

The Policy applies to all Employees of Link Group including Link Group's Board of Directors. It's Link Group's expectation that people comply with this Policy.

This Policy does not form part of your contract of employment. Link Group may remove, replace or vary this Policy as appropriate, in response to business requirements.

We encourage our suppliers to conduct business in an ethical and sustainable manner and to share our sustainability commitments where possible within their operations.

4. How to comply with this policy?

At every level, our people have accountability for ensuring the successful integration of our strategic approach for CSR and Sustainability as appropriate, in response to business requirements.

Board Responsibilities

The Board is responsible for approving this Policy and monitoring its effectiveness.

Executive Leadership Team Responsibilities

The **ELT** is responsible for overseeing the implementation of this Policy.

CSR and Sustainability Committee Responsibilities

The CSR and Sustainability Committee is comprised of the senior managers of Link Group and is a global representation of all business units and Group functions.

The Committee meets at least quarterly and is responsible for:

- communicating and monitoring the execution of the Strategy

- overseeing adherence to this Policy and ensuring compliance with applicable laws

- monitoring the impact of the Strategy and reporting the progress towards achieving its objectives internally and externally

- leading the implementation of key Link Group policies (such as LinkTogether for Good) that promote the achievements of a responsible business; and

- serving as visible CSR and Sustainability role models, advocates and representatives for Link Group.

As an organisation, we are committed to be accountable to this policy and report on our progress and achievements every year.

5. How will policy compliance be monitored?

The ELT with support from Human Resources & Brand will oversee implementation of this Policy and monitor its effectiveness. This includes the adoption of measurable objectives to assist Link Group to achieve the Strategy.

The CSR and Sustainability Committee will monitor, analyse and report adherence to this Policy and progress towards achieving Link Group's CSR and Sustainability objectives on a regular basis and provide updates to the ELT. The Audit Committee will be provided with updates as appropriate.

6. Are there any interrelated policies?

Link Group has a range of interrelated policies which cover our obligations as an employer, underpinned by our core values:

- Code of Conduct and Ethics Policy
- Discrimination/ Equal Employment Opportunity (EEO) policies as they apply in the countries in which we operate
- Diversity and Inclusion Policy
- Flexible Working Policy
- Human Rights Policy
- Health, Safety and Wellbeing Policy
- Risk Management Policy and Framework
- Vendor Management Policy

7. Definitions

Term	Definition
Link Group	Link Administration Holdings Limited and each of its subsidiaries
Employees	Any permanent employee, temporary worker and contractor, full time and part time of the Link Group.
ELT	Executive Leadership Team comprising the Managing Director and direct reports to the Managing Director
Sustainability	Link Group adopts the United Nations definition of sustainability in the Guide to Corporate Sustainability, i.e. companies "must operate responsibly in alignment with universal principles and take actions that support the society around them."
CSR	Link Group adopts the United Nations definition of CSR. "Corporate Social Responsibility (CSR) is a management concept whereby companies integrate social and environmental concerns in their business operations and interactions with their stakeholders."

United Nations Sustainable Development Goals (SDGs)	The SDGs are the blueprint to achieve a better and more sustainable future for all. They are a set of seventeen interconnected goals that are based on human rights and define global sustainable development priorities and aspirations for 2030.They address the global challenges we all collectively face, including those related to poverty, inequality, climate change, environmental degradation, peace and justice.
Diversity	This has the same meaning as that in the Diversity and Inclusion Policy. Means accepting each person as an individual irrespective of differences used to differentiate groups and people from one another. Differences may be visible or invisible. Differences may include but are not limited to gender, gender identity, age, ethnicity, cultural background, sexual orientation, marital or family status, carer responsibilities, pregnancy, breastfeeding, physical abilities/disabilities, religious or political belief and flexible working arrangements.
Inclusion	This has the same meaning as that in the Diversity and Inclusion Policy. Inclusion refers to supporting all individuals across the course of their career, irrespective of their diverse backgrounds, to bring their whole selves to work. Embracing workplace inclusion and diversity involves developing people management strategies that accommodate differences in the background, perspectives and family responsibilities of employees.
Gender equity	Gender equity is about ensuring that every individual has an equal opportunity to make the most of their careers and talents taking into account their aspirations.