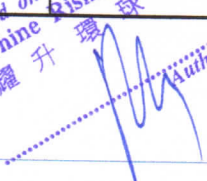




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All Employees			

For and on behalf of Sunshine Rising Limited
耀升環球有限公司
Authorised Signatory(s)



Corporate Social Responsibility

The objective of this policy is to provide the minimum standards for managing risks and opportunities relating to the conduct of corporate social responsibility (CSR) by the Sunshine Rising group to support the achievement of our vision.

The organisation is committed to its corporate social responsibility vision 'to act responsibly for the long term in how we do business, to help meet our ambition of being the world's most trusted savings, investment and insurance provider'.

The CSR policy reflects senior management's attitude towards integrity and high ethical values and is the ethical framework for the group's activities.

For Sunshine Rising, CSR covers a broad spectrum of activities; the management of our relations with our employees, customers, suppliers and the community as well as the management of our performance in respect of the environment, human rights and diversity, all underpinned by adherence to good business ethics. This policy covers:

- Business ethics
- Human rights and diversity
- Community

(Refer to CSR standards contained in appendix 1)


The remaining areas of Sunshine Rising's CSR programme including the management of our relationship with our people, our customers, our suppliers and the environment are covered by separate group policies.

2 Policy owner

- 2.1 The group policy owner for this policy is the group corporate social responsibility director.
- 2.2 The executive sponsor for this policy is the group human resources director.

3 Primary audience


- 3.1 This policy is applicable to all staff and provides them with the standards required to uphold the CSR policy. It also directs our CSR regional contacts and nominated managers on the effective embedding, monitoring and reporting of progress on the programme.
- 3.2 This policy makes clear to all our stakeholders – our customers, employees, shareholders and investors, suppliers and business partners, non-governmental organisations and pressure groups and the communities in which we operate - what our vision for CSR is and how we propose to work towards achieving it.

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4 Scope

- 4.1 The scope of the policy is groupwide and applies to all Sunshine Rising operations including businesses and legal entities.
- 4.2 For joint ventures and outsourcing arrangements, senior management should satisfy itself, as far as reasonably practicable, that the systems and controls which are in place are appropriate to monitor and mitigate risk.
- 4.3 Further, Sunshine Rising expects equivalent standards from its suppliers and business partners. Guidelines for suppliers and business partners are outlined in the purchasing and supply management policy.

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5 Alignment to risk appetite

5.1 Inherent risks

This policy supports management of the following inherent risks:

5.1.1 Business ethics

- Senior management do not demonstrate their commitment to high standards of business conduct, integrity and ethics, which may result in unethical behaviour by staff or commercial decisions being made with no regard to CSR implications and the group's reputation.

5.1.2 CSR awareness

- Staff are not sufficiently informed or aware of the group's CSR standards and vision.

5.1.3 External profile of CSR

- The group does not promote its CSR initiatives e.g. via the group annual CSR report, annual report and accounts, group website, case studies and external benchmarking. This may increase the likelihood of missed investment opportunities in the group e.g. by potential shareholders and investors with interests in a company that is responsible in its business behaviour.

5.1.4 Human rights / diversity

- The group fails to create a working culture that respects, celebrates and harnesses differences. This may affect the group's ability to recruit and retain the best people, which in turn may affect the group's ability to fulfil its business ambition.

5.1.5 Embedding CSR in the businesses


- The group fails to embed CSR in the businesses, e.g. by failing to maintain a high level of CSR understanding among the regional CSR contacts and local CSR nominated managers across its worldwide businesses. This may adversely affect the group's ability to implement its CSR strategy.

5.1.6 Community investment

- The group's reputation may be at risk if it is not seen to be supporting communities in which we operate.

Other CSR inherent risks covered by other policies:

- **Environment** - the group fails to uphold its commitment to reduce its carbon dioxide emissions. This may have financial implications for the group's global carbon neutral commitment and may adversely affect the group's climate change strategy.
- **Customer** - the group fails to embed CSR in the design and delivery in our products and services.
- **People** - the group fails to embed CSR in the people processes.
- **Suppliers** - the group fails to embed CSR in the purchasing and supply management processes.

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5.2 Risk appetite

In addition to the risk appetite statements specified in the risk management and internal control policy, the specific risk appetite statements in relation to this policy are below.

- Business activity that does not fulfil the CSR standards.
- Employees not being informed of CSR vision, activity and standards.
- Unaccounted for increases in the group's carbon dioxide emissions that compromise the group's global carbon neutrality status.

The group has appetite for:

- Promoting diversity amongst the group's senior management.

6 Minimum standards

6.1 Risk management and control

The key risk processes and principles covering the inherent risk areas above are set out in this section.

6.1.1 Planning / change

Management information for CSR risk should be used to provide insight, inform the operational planning process and influence resource allocation including capital.

6.1.2 Risk appetite

Risk appetite statements and tolerances should be clearly defined and refreshed on a regular basis (at least annually) and as an integral part of the planning process. Risk appetite should be defined for a business as usual situation within an established business and also needs to be sufficiently flexible to deal with a variety of situations (e.g. rapid market expansion, managing significant change) and should support rather than constrain sensible risk taking to deliver business strategy.

6.1.3 Risk analysis

Regular reviews (at least on a quarterly basis) of CSR related systems and processes must be actively performed to ensure inherent CSR risks are effectively managed.


A risk assessment must be undertaken by the businesses to identify those areas susceptible to social responsibility risk and introduce preventative controls into new and existing systems and processes.

6.1.4 Controls

Appropriate controls must be in place to ensure the following requirements are met:

A. Governance

- CSR regional contacts must maintain a system of delegated authorities which provides a clear and appropriate allocation of CSR responsibilities, including CSR support at senior management level.
- CSR regional contacts must ensure that there is adequate and capable CSR resource available to manage the regional and local business CSR programmes. This includes designing, documenting, operating, communicating to staff, reporting and monitoring an appropriate CSR management system that is adequate to meet local, regional and group requirements.

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- iii. CSR regional contacts must allocate local policy owners to ensure that the requirements within group policies are understood and implemented by the business and that adequate embedding, reporting and monitoring arrangements are in place locally.
- iv. CSR regional contacts must also ensure that CSR responsibilities are incorporated within CSR nominated managers' and other relevant individuals' job descriptions, objectives and performance assessments.
- v. CSR standards outlined in appendix 1 must be complied with.

B. Risk and control cycle

- i. CSR key performance indicators (KPIs) must be included in the regions' annual report submission to group CSR.
- ii. CSR regional contacts must ensure that businesses meet CSR policy compliance reporting requirements in line with group requirements. Regions must disclose all material areas of non-compliance.
- iii. Businesses must ensure that their external business partners understand and are committed to this policy.

C. Management information

- i. Sunshine Rising will report progress in its annual CSR report and annual report and accounts.
- ii. Regions must fulfil the reporting requirements of group CSR.

6.1.5 Actions

Where differences in risk appetite and the residual risk profile have been identified by the risk analysis process, remedial action plans must be put in place. In instances where controls are deemed to be deficient, these action plans should include improvements in both the control design and its operation. In all cases action plans should contain SMART (specific, measurable, achievable, realistic and time-bound) actions with progress reported on a regular basis to management.


6.1.6 Line management and reporting

Procedures must be established to enable the reporting of CSR related risk issues to local management and group senior management on a regular basis.

Clear lines of internal accountability, responsibility and reporting must be established. Primary responsibility for managing CSR related risks rests with the head of business. Appropriate internal controls must be in place, operating effectively and staff must be adequately trained.

Escalation of breaches

- i. Material breaches of this policy, including any identified issues that could lead to a breach, should be notified to the group policy owner and the regional chief risk officer immediately (within 24 hours). Where breaches are identified that are material at group level, the group chief risk officer should also be notified.
- ii. Materiality of a breach or issue can be determined by reference to the delegated authority limits for risk management that outline the relevant

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escalation protocols.

iii. The group policy owner will advise the relevant oversight committee (i.e. ORC or ALCO) and executive sponsor of any material breaches.

iv. As primary responsibility for risk management lies with line management it is expected material breaches will be also reported up through functional management. All material breaches should be documented through the quarterly risk reporting cycle.

6.2 Responsibilities

6.2.1 Business

Head of business:

- Ensures that the business manages CSR risk and operates in line with the minimum standards in this policy.
- Maintains an appropriate control structure and culture to manage CSR risk exposure within appetite.
- Meets management information reporting requirements to demonstrate that CSR risks within the business are being managed effectively.

Local policy owner:

- Acts as a local subject matter expert and provides guidance in relation to the policy.
- Ensures that the requirements within this policy are understood by the business to assist them in implementing local compliance monitoring arrangements.

CSR nominated managers:

- Must coordinate and oversee the business embedding, target setting, reporting and monitoring of the CSR programme.

Staff:

- It is the responsibility of all staff to familiarise themselves with Sunshine Rising's CSR policy, including the standards contained in appendix 1.


6.2.2 Region

- The responsibility of the region is to provide appropriate oversight and challenge, as part of the second line of defence, in order to satisfy itself that the businesses in the region operate in line with this policy.
- Regional executive management have a comparable responsibility for their regional operations. They must review the region's CSR programme progress at least annually.

6.2.3 Group

Group policy owner:

- Maintains the integrity of policy content and develops adequate guidance material to support implementation.

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- Acts in an advisory capacity to set the risk appetite and provides guidance on establishing the control environment to ensure risks are managed within appetite.
- Provides advice, support and technical guidance in relation to the policy, including application for waivers and notification of breaches.
- Defines the management information required from the business for the oversight committees to discharge their governance oversight and also
 - Environment
 - People
 - Business protection
 - Group brand development director – customers.
 - Director of purchasing and supply management – suppliers.
 - Group HR director, supported by relevant HR directors – our people.
 - Group business protection director - health and safety.

6.2.4 Committee

Group board CSR committee:

- Is responsible for CSR strategy and policy, and for reviewing and monitoring progress of the group CSR programme. It will draw issues of concern to the attention of the executive management and the group board.

Group chief executive:

- Is the main board director with primary responsibility for the CSR policy.

Group CSR team:


- Has liaison responsibility with CSR regional contacts and is responsible for coordinating a coherent CSR programme across the regions.
- Provides technical advice and reports to these committees as appropriate.

Responsibility for the individual CSR activities reside with the:

- Group CSR director - business ethics, human rights and diversity, environment and community.

7 Waivers and exceptions

- 7.1 In exceptional circumstances, and on a case by case basis, a waiver or exception may be granted to this policy.
- 7.2 All requests for a waiver or exception in respect of any requirements of this policy must be discussed with the regional chief risk officer. Applications should be forwarded to the group policy owner (cc group chief risk officer) with a supporting detailed business / operational justification signed by the business head requesting the waiver or exception.
- 7.3 The group policy owner, in liaison with the group chief risk officer, will decide upon the application and advise the region of the outcome. The group policy owner will provide details to the relevant oversight committee (i.e. ORC or ALCO) and executive

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sponsor of any waivers or exceptions granted.


8.3 Risk and control matrix

This document demonstrates the linkage between the inherent risks, control objectives, and illustrative key controls and key indicators (qualitative and quantitative) that can be used to provide insight and evidence as to whether the inherent risks the policy is seeking to address are being mitigated adequately in practice.

A matrix should be maintained for each policy. Gathering evidence through indicators will provide the insight into the effectiveness of the internal control environment, and so limiting the need for detailed testing.

8.4 Glossary

A central glossary is maintained within the risk management and internal control policy. There are no specific terms unique to this policy so no technical glossary is provided.

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Appendix 1

Standards for Sunshine Rising's corporate social responsibility policy

CSR management

Acting responsibly in how we do business will play a key part in winning the trust of our stakeholders and building a successful and sustainable business in the long term.

This CSR policy outlines our approach to CSR and how we manage and embed CSR in the business. The below standards provide a framework for businesses to help meet the Group's CSR vision.

These standards cover the elements of CSR which are the responsibility of the group corporate social responsibility director, including:

1. Business ethics
2. Human rights and diversity
3. Community

In addition, the management and reporting of CSR in the Sunshine Rising businesses includes compliance with the CSR-specific standards outlined in the following group risk management policies:

- Business protection
- Customer
- Environment
- Financial crime
- People
- Purchasing and supply management


1. Business Ethics

We are committed to being a responsible business. We aim to ensure that, in everything we do, we meet the highest standards of business conduct.

Sunshine Rising's principles for good business ethics:

- Commitment to fair business practices in our relationships with our customers, employees and suppliers
- Commitment to transparent business practices
- Commitment to honest business practices
- Respecting the confidentiality of information entrusted to the company
- Obeying the rule of law
- A commitment to accurate and honest reporting to our stakeholders

This Code expresses Sunshine Rising Worldwide Limited's commitment to business integrity. It applies to all companies and individuals within the Sunshine Rising Worldwide Limited's Group, and we expect all our partners to abide by the same standards when working with us.

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No bribes including facilitation payments

Sunshine Rising Worldwide Limited's abides by all applicable national and international laws in the countries where we operate.

We prohibit bribery to anyone, and the making of undue payments or kickbacks in any form, whether direct or indirect. This includes a prohibition on all bribes or facilitation payments to speed up routine governmental transactions or to secure business.

Sunshine Rising Worldwide Limited's recognises that in some cases demands for bribes may be accompanied by a form of extortion, including possible loss of business or - in the worst case - physical violence. The health and safety of our employees is paramount in all circumstances. If Sunshine Rising Worldwide Limited's employees or agents are exposed to such demands - or think that they might be - they must report the details to senior management as soon as possible.

Gifts and hospitality

Sunshine Rising Worldwide Limited's prohibits the offer or receipt of gifts or other benefits that could affect either party's impartiality influence a business decision or lead to the improper performance of an official duty. This principle applies to our relationships with suppliers, officials and anyone else with whom we deal in the course of our work.

Sunshine Rising Worldwide Limited's employees may offer and accept reasonable hospitality given in the normal course of business. However, in all cases we must ensure that the gift or benefit is offered as an expression of goodwill and not in expectation of a return favour.

Employees may not in any case offer or accept gifts, entertainment or gratuities whose value exceeds the financial limits which are to be set by their relevant country or general managers unless their prior written approval is obtained.

Country Managers and General Managers are required to record all gifts and entertainment above these limits in a gifts register to be kept in their local offices. The registers are subject to audit.

Business partners supplying services to Sunshine Rising Worldwide Limited

Sunshine Rising Worldwide Limited engages a broad range of business partners to work on its behalf including agents, representatives, consultants, subcontractors and suppliers. Sunshine Rising Worldwide Limited is committed to the principles of openness and transparency in our dealings with all of them, and expects the same commitment in return.

We require all such business partners to apply ethical principles that are consistent with our own, including our anti-bribery policy and our commitment to fair labour conditions. Where problems arise, we will in the first instance use our influence to seek corrective action. Where this proves impossible, we reserve the right to withdraw from the business relationship.


In all cases, the fees, commissions and terms of all business relationships are to represent appropriate and justifiable remuneration for legitimate goods and services rendered.

Fair competition

We compete fairly and honestly, observing all applicable anti-trust and competition laws. We are truthful in every detail concerning our products and services when we advertise or solicit for business.

Personal conflicts of interest

Sunshine Rising Worldwide Limited employees must avoid conflicts of interest (both real and perceived). For example, we do not compete with the company, either directly or indirectly, or use knowledge gained while working for Sunshine Rising Worldwide Limited to help anyone else compete with it. Similarly, Sunshine Rising Worldwide Limited employees must not do business on behalf of Sunshine Rising Worldwide Limited with a company from which we or a family member or another connected person may directly benefit without prior written approval of the

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relevant divisional management. Sunshine Rising Worldwide Limited employees are not to have personal interests (either individually or through family) in companies that compete with or do business with Sunshine Rising Worldwide Limited unless the relevant employee had prior agreement with his manager in advance, although Sunshine Rising Worldwide Limited employees can of course own shares in publicly traded companies.

'Family' includes spouse, children, parents, siblings, civil partner or stepchildren. Any conflict of interest that does arise should be raised with your HR representative.

Books and records

We take care to maintain accurate books and records that reflect our business transactions as they occur, and we keep them for as long as legally required.

Charitable donations

We will only provide donations to organisations that serve a legitimate public purpose, and are themselves subject to high standards of transparency and accountability. Our contributions will always be transparent and properly documented.

Political neutrality

We do not make donations to political parties or to any other government officials.

Seeking guidance and reporting problems

If any employee wishes to seek guidance on the application of this Code, they must seek guidance from their HR Representative or the Group Compliance Manager.

Compliance and implementation

These principles are endorsed by the Sunshine Rising Worldwide Limited Board of Directors and apply to all Group member companies including, where possible, associates, agents and joint ventures involving Sunshine Rising Worldwide Limited Group. It is the responsibility of senior management to ensure that they are disseminated and fully understood at every level throughout the Group.

Sunshine Rising Worldwide Limited will not criticise or penalise employees for any loss of business resulting from adherence to these principles. Similarly, we will not penalise employees who report concerns in good faith even if on closer investigation these turn out to be unfounded. However, we take infringements very seriously. Employees who fail to abide by these principles may face disciplinary action, including dismissal.

2. Human rights and diversity

Sunshine Rising respects all fundamental human rights and will be guided in the conduct of its business by the provisions of the United Nations Universal Declaration of Human Rights (UNUDHR) and the International Labour Organisation (ILO) core labour standards. Sunshine Rising also supports the UN Global


Compact Principles.

The UNUDHR articles of greater relevance include 2 (which deals with discrimination), 23 (which deals with terms of employment), 24 (which deals with work life balance) and 25 (which deals with adequacy of standard of living).

Sunshine Rising's people policy outlines our people management practices.

Value and respect diversity

The group is committed to creating a working culture that respects, celebrates and harnesses differences to the benefit of customers, employees, shareholders, business partners and the wider

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communities within which we operate.

The principle of equal opportunities for everyone in employment is an important part of this working culture. Businesses shall have in place policies that reflect local legal requirements and group wide good practice.

Businesses will ensure that access to employment, training and promotion is:

- Free from discrimination on the grounds of sex, sexual orientation, marital status, creed, colour, race, religion, age, ethnic origin, nationality, union status or disability.
- Based solely on the objective assessment of ability and other relevant job related criteria.
- In the case of training and career development, based on assessed need.

Any allegations of harassment or discrimination will be treated seriously and investigated fully and will be dealt with in accordance with local disciplinary and other appropriate policies.

Businesses must apply group standards and establish monitoring and other supporting processes to ensure the objectivity of employment related decisions. Including:

- Those involved in decision making processes shall be trained to ensure decisions are taken based on objective criteria and can be justified.
- The main areas where such processes shall be established are: - Recruitment and selection; Career planning, promotion and transfer; Training and personal development; Performance management; and Redundancy.

Diversity vision

Diversity is about everyone. We believe in a working culture that respects, celebrates and harnesses difference to the benefit of customers, employees, shareholders, business partners and the wider communities.

Our competitive advantage depends on business teams that include people with different backgrounds, experiences and perspectives, who feel valued for the positive contribution they can make to Sunshine Rising's success. ("Together We Are Stronger".)

3. Community

Sunshine Rising is committed to good corporate citizenship and to supporting charity and community initiatives which are relevant to its business, employees, customers and stakeholders. This document explains the parameters for this support and the way in which both the Sunshine Rising group and businesses can work within them.


Sunshine Rising's business activities bring it into contact with a range of stakeholders and communities. We recognise our responsibilities to these groups and fund a programme of investment in charity and community initiatives (e.g. programmes run by schools and other community groups that are not registered charities) to support them.

Criteria for community investment

Our community investment programme centres on two core themes which are closely aligned to our 'prosperity and peace of mind' vision and where we have real expertise: 'education and financial literacy' and 'life trauma' (i.e. caring for people going through a distressing life event).

In addition, we have established a range of criteria through which we identify initiatives that it might be appropriate to invest in. Any initiative must:

- Relate to the core themes identified above.
- Be clearly relevant to Sunshine Rising's aims and

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brand values.

- Have global resonance – so activity is equally relevant across country and business boundaries.
- Be significant – with the investment focused around substantial initiatives that will give Sunshine Rising real presence and profile with the groups/communities involved and external stakeholders.
- Demonstrate partnership, by helping relevant charities to deliver long-term goals (rather than single events or milestones).
- Offer opportunities for communication both globally and in key local markets.
- Offer opportunities for Sunshine Rising people to 'get involved' through volunteering activities.
- Be measurable, with clear KPIs that evaluate both output and impact.

Please note that neither Sunshine Rising group nor its businesses will invest in initiatives that meet any of the following criteria:

- Individuals outside the company looking for charity fund-raising donations or personal sponsorship for fund-raising activities
- Political or religious organisations
- Extreme, "high risk" or "free" sports
- Paid advertisements in charity brochures or event programmes that do not support the core themes identified above.

Guidance for businesses

Sunshine Rising businesses around the world will be expected to follow the above guidelines for the majority of their investment in charity/community initiatives.

However, the group acknowledges that businesses will also want to support initiatives that resonate with their local marketing strategies and the environment in which it operates. Where community investment activity sits outside the two core themes of 'education and financial literacy' and 'life trauma', businesses must ensure their activities are not in conflict with the group's criteria for non-investment outlined above.


Businesses should actively encourage staff participation in their charitable giving and community activities, providing employee volunteering opportunities during company time of up to three days per year.

Businesses are also encouraged to consider other opportunities for supporting employees' good will and support for the community – including:

- Offering an employee payroll giving scheme – whereby employees can donate directly to charity from their salary.
- Match-funding employee fundraising activities.
- Offering an employee award scheme whereby employees can apply for funds to support a charity/community group of their choice.

Each business should develop its own community investment plan in line with the group approach, observing the relevant social, cultural and religious beliefs and conventions which exist in their respective markets.

Businesses should, in the first instance, contact their regional CSR co-ordinator for any clarification on the group CI strategy and guidance. Where further guidance is required, the regional CSR co-ordinator will approach the group CI committee.

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Key issues and KPI's are:

Business ethic awareness- % of employees who have understood, accepted and signed off code of conduct

Reputation- External recognition given to the business for external CSR objective

Human rights/diversity- % of women and in senior management,% of employees feeling they are treated with respect, diversity of employee metrics report

Community- Reputation of business, amount of community investment in business, % of total net working hours volunteering,level of CSR understanding