



LOMGroup People Policy

AUGUST 2017

Our Policy

“Our people remain the cornerstone of LOMGroup’s success.”

The principles described in this policy and the other global HR policies are truly global, and are relevant to all employees. We also operate regional policies, which can be found on the relevant portal page.

Recruitment

LOMGroup’s most valued resource is its employees. Therefore it is essential that LOMGroup attracts, selects and retains employees of the highest calibre. LOMGroup strives for a fair, open, consistent and effective process to attract and select high calibre candidates for positions which will maximise contribution to the business. In order to achieve this, all staff should comply with the requirements of the *Global Recruitment Policy*.

Additionally, the *Global Employee Referral Policy* sets out how employees can be involved in sourcing candidates of the highest quality.

Both these policies can be found on the HR Portal page.

Personal Behaviour in the Workplace

LOMGroup aims to establish and uphold high standards of behaviour and conduct in the workplace and at work-related social events. All employees should conduct themselves at all times in a professional manner as detailed further in the *Global Behaviour Policy*. This means, amongst other things, that employees are to treat colleagues and others with courtesy and respect. At LOMGroup integrity and respect are highly valued and cooperation and tolerance are also expected. It is essential that you accept personal responsibility for maintaining high standards of conduct and behaviour in the workplace and at work-related social events. Employees need to be aware that it is the recipient’s perception of the behaviour that is important, not the deliverer’s intention.

Career and Personal Development

Career development at LOMGroup means creating and taking advantage of every opportunity to grow both personally and professionally. LOMGroup has also implemented practices and tools to help employees achieve this development. This includes formal annual appraisals with direct managers. The nature of LOMGroup’s business and our growth means that you can come to LOMGroup for just a few years experience, or you can build a long term career with us. We value diversity of experience within our business.

LOMGroup’s goals are dependent upon attracting and retaining smart people. People who share our ambitions thrive in our culture and will help our teams across the world to fulfil their potential. Our teams have to keep innovating and

You will find further information on the L&D Portal, the Appraisal Portal and the Internal Transfers Policy. Additionally, for the investment streams there are Career Propositions for each role – contact your manager for further information.

Equal Opportunities

LOMGroup is committed to ensuring that all LOMGroup job applicants, employees, and contract workers are treated fairly and are offered equal opportunity in selection, training, career development, promotion and remuneration in accordance with applicable local employment laws. LOMGroup's goal is to recruit, promote and reward on the basis of merit, ability and performance and to treat each other with respect without regard to legally protected status.

Our aim is to ensure that:

- We have access to the widest labour market and secure the best employees to support our business goals
- People are selected, promoted and treated equally, enabling us to maximise potential to the benefit of individuals and
- LOMGroup
We have employment procedures and practices which do not discriminate on grounds of age, gender, marital status, gender reassignment, race, colour, nationality, ethnic or national origin, religion or religious belief, trade union membership, disability, sexual orientation, or any other legally protected category
- We treat all those with whom we come into contact with respect
We meet our statutory obligations regarding employment
- legislation and adopt best practice where appropriate
We communicate the Equal Opportunities Policy and
- responsibilities for achieving fairness and equality; and
Senior managers understand their responsibility in enforcing this

We also aim to ensure that all customers and those with whom we come into contact are treated with respect, and have full access to our products and services.

Leave

Leave is an important part of work life balance; equally the good management of leave entitlements by the individual employee and their manager is essential to the health and safety of the employee and LOMGroup. LOMGroup aims to provide a uniform and equitable approach to the calculation of leave entitlements, at or above the minimum applicable legislative requirements.

Dispute Resolution

LOMGroup's values include being commercial and fair, respecting others and maintaining integrity and professionalism. In support of these, LOMGroup aims to establish and uphold the highest standards of behaviour and conduct. For these reasons LOMGroup has guidelines around employee grievances and discipline.

If you have a grievance or complaint relating to your work, your working conditions, your pay and benefits, working hours, or treatment at the hands of your fellow workers, or if you are concerned about your health and safety or a breach of your statutory employment rights or any other issue affecting your employment, LOMGroup encourages you to talk the matter over on an informal basis with your manager or someone from the HR team. If you wish to make a more formal

a number of avenues you may pursue. You can find details of these on the HR portal or from the HR team.

It is necessary for the proper operation of LOMGroup's business and the health and safety of our employees that we operate a disciplinary procedure. You can find details of these procedures on your regional HR portal area.

Data Protection

As a major international company, LOMGroup processes data across international boundaries, including outside the EU. In particular your personal data may be transferred within LOMGroup to offices in other countries.

Legislation in the US and other nations outside the EU does not always require the same level of protection for personal information as within the EU. However, in such cases, LOMGroup strives to handle personal data (including sensitive personal data) in a manner which meets the high standards required for personal data protection in the EU.

Leaving LOMGroup

When someone leaves LOMGroup they will be treated fairly, reasonably and appropriately, whatever the reason for their leaving.

Outside Business Interests

LOMGroup employees are not permitted to be a Director of any non-LOMGroup company, the proprietor of any business, a partner in any firm or business or otherwise take on any meaningful paid employment without the prior written approval of the appropriate member of the LOMGroup Executive Committee.

Where employees wish to gain permission to be a Director of any non-LOMGroup company, the proprietor of any business, a partner in any firm or business or otherwise take on any meaningful paid employment, they must apply directly to the appropriate member of the LOMGroup Executive Committee. Where written approval is granted, the employee is responsible for providing a copy of the written approval to the HR team for filing on their record.

Personal Use of Corporate Assets/Facilities

LOMGroup recognises that occasional personal use of corporate assets/facilities, such as telephones, computers and access to the Internet, does occur. It is, nonetheless, important that employees act in accordance with our values and limit their personal use of company facilities/assets, particularly during the working day.

For example, occasional personal telephone calls and personal use of the Internet is an acceptable part of the give and take which must be present in a healthy relationship between a responsible employer and employees who are seen as a key asset of the company.

It will be for business unit/department heads to guide individuals on what may constitute an inappropriate level of usage in the particular circumstances of that individual's position within the company.

It is, of course, not just the level of usage of company assets/facilities which should be considered but the manner in which they are used. For example making a doctor's

appointment over the telephone would clearly be acceptable whereas long personal calls should be discouraged.

Electronic methods of communication raise additional issues for employees and LOMGroup because personal usage when using company facilities cannot easily be distinguished from corporate endorsement. The consequences of this could be significant in terms of the group's reputation. Therefore, even if your use of LOMGroup's electronic facilities are deemed appropriate by your manager you should ensure that personal business is clearly understood to be personal.

It is particularly important to remember that electronic facilities can create a permanent record which, through the legal mechanism of discovery, could provide concrete evidence of inappropriate conduct on the part of the employee and, through association, LOMGroup.

Clearly it is important that LOMGroup has the ability to protect its reputation where this might be damaged *inter alia* by the inappropriate behaviour of an employee. It is therefore important that LOMGroup can, where necessary, access internal and external e-mails and the group reserves the right to read all e-mails sent using the group's equipment in line with local legislation and practice. It is not the group's intention to read e-mails as a matter of course unless there is a genuine suspicion that such a course of action is necessary.

Whistleblowing

Where any employee discovers information which they believe shows malpractice or wrongdoing within LOMGroup then this information should be disclosed internally or alternatively on a confidential basis through an independent external hotline service provided by *Tell Us* confidentially. This type of incident reporting is also referred to as 'whistle blowing'.

Such reporting will normally apply to concerns that are in the wider interest of LOMGroup and may include:

- Financial malpractice or impropriety or fraud
- Failure to comply with a legal obligation or Statutes
- Dangers to Health & Safety or the environment
- Criminal activity
- Improper conduct or unethical behaviour; or
- Attempts to conceal any of these.

There should be no fear of reprisal or victimisation or harassment for making such disclosures in good faith. LOMGroup supports explicitly Wistle-blowing.

Incident reporting, however, should not be used to question financial or business decisions taken by LOMGroup or to reconsider any matters that have already been addressed under Group employment policies or procedures.

Under most circumstances, employees would be expected to raise concerns with their line manager who will pass this information to the appropriate Management Committee member. Should this route be neither suitable nor acceptable, then the employee may approach one of the following individuals who have been designated to provide impartial advice on the appropriate course of action to follow.

1. Director, Group Compliance;

2. Director, Internal Audit
3. Group Legal Counsel & Company Secretary.