



Code of Business Ethics and Responsibility



Contents

Foreword by our CEO	3
Putting the Code into practice	5
Ethical decision making and speaking up	7
Ensuring we conduct business responsibly and fairly	9
Commitment to our people and our culture	14
Working with stakeholders	17
Ensuring integrity in our operations	19
Contact us	21



Introducing our Code of Business Ethics and Responsibility

An introduction for our stakeholders

Ethical and responsible behaviour is central to how L&G does business. We insist on high standards of integrity from our employees, our suppliers and those doing business with us.

This document, our Code of Business Ethics and Responsibility, sets out our expectations. It's primarily intended for our employees, but we publish it on our website as a way of holding ourselves to account for how we act.

It draws on a range of internal and external policies which govern our business. If you're working, dealing or liaising with L&G employees, you have our commitment that we will endeavour:

- always to be open, honest and fair in our dealings with each other, and with our customers, communities, business partners, suppliers and any other stakeholders with whom we interact
- not to tolerate discrimination, harassment, sexual harassment, bullying or victimisation either in relation to our employees, or in our relationship with any other individual or organisation
- to operate within the applicable laws, rules and regulations in the countries where we operate
- to safeguard personal data and any information of a non-public nature
- to avoid acting in any way that could bring L&G into disrepute or undermine the values it represents
- to empower everyone who does business with us to tell us when things go wrong, and move quickly to put things right.

We welcome stakeholders' views on this Code and on our approach to ethics. Please refer to the contact details at the end of this document to find out how to get in touch.

An introduction for our employees

L&G's commercial success depends on you, our employees. We work together in a wide variety of roles to meet our customers' and clients' needs directly, or support those who do.

All of us play a role in delivering our strategic objectives, serving our customers and clients, and delivering on our purpose: investing for the long term. Our futures depend on it.

Ethical and responsible behaviour is an integral part of the way we do business here at L&G. We insist on very high standards of integrity from employees, our suppliers and those doing business with us.

We are committed to providing equal employment opportunities to all employees and applicants irrespective of race, religion, sex, age, disability, or any other legally recognised protected characteristic. We strive to create a respectful and inclusive environment in which a diverse workforce can succeed. Our three behaviours – Challenge positively, Commit together and Act decisively – describe the kind of culture we want to build and the ways we act around each other and with our stakeholders.



This document, our Code of Business Ethics and Responsibility, sets out what we expect of you, an employee of L&G. The principles apply to all L&G employees¹ globally. The Code works alongside our various Group, divisional and country-specific policies to form a collection of frameworks which govern how we work. It doesn't cover every possible situation that may arise, but it does help guide you towards additional information where needed – as well as setting out our expectations clearly.

While it's aimed at employees and those doing business on our behalf, we publish it for other stakeholders to read too. This is one of the ways in which we hold ourselves to account for how we do business.

Together, we are working to build and maintain a culture where everyone understands what is expected of them when it comes to ethical and responsible behaviour and where everyone feels safe to speak up. It's the foundation of the positive difference that our company is seeking to make, now and for the long term.

António Simões

Group Chief Executive Officer June 2025²

¹ This Code of Business Ethics and Responsibility applies to all employees of any wholly owned subsidiary of Legal & General Group Plc.

² The Code of Business Ethics and Responsibility was published in June 2025. The following sections have since been updated: Speaking up, former Diversity & Inclusion section (now Inclusion & Wellbeing), Health & Safety and the addition of a section about Ethics and AI.



Putting the Code into practice

1. Who should follow the Code?

- The Code is for all L&G employees.
- We also expect contractors and agency staff working for us to comply with the principles contained in it.
- If you are a manager, you're expected to lead by example. Actively demonstrate responsible and ethical behaviour yourself and encourage the same from your team. Set the right tone. Be proactive in ensuring your team understands and recognises the importance of this Code.

2. What does the Code do?

- As L&G employees, you must maintain the highest standards of behaviour when conducting any aspect of business. This Code helps set out these expectations, and what our individual responsibilities are. It also points out where further information can be found elsewhere in our body of company policies.
- The Code demonstrates that we are an ethical and responsible organisation, and it aligns with our broader compliance requirements with the Financial Conduct Authority (FCA) and Prudential Regulation Authority (PRA) in the UK as that is where we are headquartered. Given we are an international business, we also recognise our need to be fully compliant with the legal and regulatory requirements in the jurisdictions in which we operate.

3. As an employee, how do I put the Code into practice?

- Read the Code and consider how it applies to your individual role but also to your wider team.
- Consider any other policies, standards or practices you should be aware of. These can be found either on the intranet or via MyHR.
- Decisions will depend on your good judgement. In difficult situations, consider discussing the matter with your manager or another colleague. Examples of the standards of conduct we expect from you are:
 - i. acting with integrity
 - ii. treating customers fairly, openly and honestly
 - iii. prioritising co-operation over self-interest
 - iv. treating colleagues with dignity and respect.
- Don't be afraid to challenge others who you feel are in breach of the Code.

4. How will the Company help you put the Code into practice?

- As an employer, we're responsible for helping to create and nurture an environment where everyone feels safe in making the right business decisions and speaking up when they suspect something is not right. This includes situations where you experience or witness any form of unwanted conduct.
- If you feel the need to speak up about something in breach of this Code, we will support you in doing this. If you feel unable to speak to your manager, you might want to use our speak up channels, or speak with someone in Human Resources (HR), Financial Crime, Risk and Compliance or the relevant union. You might



also choose to speak with someone in your senior leadership team – this will vary division to division, country to country.

- In certain countries where we operate, we also provide access to an Employee Assistance Programme (EAP) – enabling you to speak with a third party, confidentially. If you do not have a local EAP service, you can use the UK service.
- You can also use our speak up referral channels, through which you can report a concern anonymously if you wish.

5. What happens if I do not follow the principles outlined in this document?

- Any action by any of our employees that does not meet L&G's Code of Business Ethics and Responsibility as laid out in this document may be subject to investigation and, depending on the severity of the breach, to formal disciplinary procedures.
- It's important to note that the areas of reportable conduct in this document are non- exhaustive. Any activity undertaken by an employee that contradicts our core values may lead to disciplinary action.
- Regulators may need to be informed.

Given the potential repercussions of breaching this Code, it's essential that if you become aware of any wrongdoing, you report it as soon as you can either to your manager, or someone else – further detail is provided on pages seven and eight of this document.



Ethical decision making and speaking up

How should we make ethical decisions? Whilst something might be legal, it doesn't always mean it's the right thing to do. If you have any doubt over a decision, ask yourself:

- Am I acting with integrity?
- Does it feel right?
- Who else could be affected by my decision?
- Would I want to be treated this way?
- Would I be embarrassed if others knew what I had decided?
- Do I have all the necessary information to make my decision?
- Is this action consistent with L&G's policies and procedures?
- Is this action consistent with L&G's values?
- Would it meet the expectations of our regulators?
- Am I acting in good conscience?
- Am I prepared and able to explain my actions?

In most cases, the questions above will help you come to the right decision. But if you are still unsure, please seek the advice of your manager or other appropriate colleague. This might include individuals in teams such as Human Resources (HR), Financial Crime or Risk and Compliance.

You might also choose to speak with someone in your senior leadership team – this will vary division to division, country to country.

If things go wrong – how and when to speak up

Despite our efforts to apply high standards of behaviour as to how we run our business, there may be times when things go wrong, or we do not meet the standards we set. On those occasions, it is important that we provide a means for redress and remediation. As well as processes and teams dedicated to complaint handling, we offer financial redress where needed, and operate an impartial whistleblowing facility for all our stakeholders.

Potential wrongdoing in a financial services organisation could take several different forms. For example, failing to provide good customer outcomes, payment fraud or breaching any of the regulations that apply to our business. Other examples might include mistreatment or discrimination by a colleague or overlooking health and safety responsibilities.

If you suspect any wrongdoing, it's important to speak up – otherwise certain behaviours or unwanted conduct may go unnoticed and continue, potentially harming others and putting our reputation at risk.

We will not tolerate retaliation or victimisation against anyone who raises a genuine concern, whether they are an employee, a customer, client or any other stakeholder. Any employee who is found to have retaliated against another employee or stakeholder because they have raised a genuine concern is likely to face disciplinary action, up to and including dismissal.



Feel safe in speaking up

We want everyone who works at L&G to feel safe in speaking up. If you are unsure about something, err on the side of caution and raise your concern. It doesn't matter if you are mistaken – it's always better to have spoken up and let the situation be investigated. If you are worried about speaking up, speak to your manager, HR business partner, member of senior management (e.g. in your team, division, country), or a union representative if relevant.

If you don't feel you can raise your concern this way, please use our speak up channels. You can raise your concern online by using our QR code, by email or a telephone number (which is free in the UK and published on our employee intranet). This service is also available to employees based outside of the UK as well as other external stakeholders who can email the whistleblowing service at the address given [on our website](#). Remember:

- all concerns can be anonymous and are treated confidentially
- the main hotline is a UK free phone number and is manned 9am-5pm Monday to Friday UK time. Please note a voicemail or call-back can be requested to arrange a suitable time if needed.
- the '0800' speak up hotline number can be called from outside the UK by replacing the leading "0" with either +44 or 0044. Call rates will be dependent on the mobile or landline service provider.
- you can use our speak up service as a source of advice if you are unsure about something – for example, whether a breach of the Code has occurred.
- please refer to the internal Speak Up Policy if required (on our intranet) or our external webpage: [Speaking up | Legal & General Group](#)

Our HR consultants also provide support in speak up investigations to enable swift referrals of any welfare concerns. Most employees can access support directly through our EAP which is available in the UK and other countries. If you are located where a local EAP isn't in place, you can access the UK service.

Raising concerns with the regulator

We will determine if a breach of our policies requires escalation to the regulator. However, if you feel unable to raise your concerns with us directly, you can also report your concern to the relevant regulator in the country where you work.



Ensuring we conduct business responsibly and fairly

Conduct

Market abuse and inside information

There are some employees who may obtain inside information about issuers, securities or the potential effects of our own investments and trading in securities. This may happen during the course of business or outside it, and it may be voluntary or involuntary.

Market abuse, which consists of insider dealing, the unlawful disclosure of inside information and market manipulation, is a criminal offence and will not be tolerated.

All employees must adhere to the requirements set out in the Group Employee Conduct Risk policy and must not engage in any activity which might constitute market abuse and must not advise, procure or encourage anyone to do so. The policy also sets out clear instructions to all employees on the personal account dealing rules including how to declare and seek permission for any trading activity caught by the policy.

In Asset Management, where inside information is most likely to be held due to the investment management activities undertaken, all employees must ensure they have read the Asset Management Global Market Conduct policy. The objective of the policy is to establish a consistent and responsible attitude to anti-market abuse, with the aims of:

- setting out principles in regard to the sharing, use and recording of inside and confidential information
- minimising the potential and actual incidence of market abuse
- detecting and reporting incidents of market abuse
- establishing employees' obligations to immediately report any suspicions of market abuse to the Compliance team.

Inside information is information of a precise nature which has not been made public, relating, directly or indirectly, to one or more issuers or to one or more financial instruments, and which, if it were made public, would be likely to have a significant effect on the prices of those financial instruments or on the price of related derivative financial instruments.

Using this information for trading purposes or providing it to others is illegal because it gives an unfair advantage over other investors who do not have the same access to the same information.



Market abuse in practice:

- Trading while in possession of inside information (US law) or trading on the basis of inside information (UK law).
- “Tipping off” another person by sharing inside information otherwise than in the proper performance of your employment.
- Recommending that another person engage in insider dealing or inducing another person to engage in insider dealing.
- Effecting transactions or orders to trade which employ fictitious devices or any other form of deception or contrivance..

Conflicts of interest

Conflicts of interest can sometimes arise between us and our stakeholders including our customers, our employees, our associated companies, or our representatives. A conflict of interest is where our duties to any of these may conflict with what is best for us.

A competing interest could make it difficult to act impartially or may make it appear that we are not acting impartially, undermining the confidence of our customers, regulators, the market, or other stakeholders. We take our responsibility to identify and manage conflicts of interest fairly between us and our customers, or between two different customers, very seriously.

To ensure we treat our stakeholders consistently and fairly, we set out the requirements on how to identify and manage conflicts of interest in our Conflicts of Interest Policy which is published on our Group website under policies: [Our policies - group wide policies | L&G \(legalandgeneral.com\)](#).

We maintain a centralised conflict of interest register to enable a greater level of oversight of conflict identification and management. Senior managers and certified staff are responsible for ensuring that conflicts of interest, for which they are responsible, are accurately recorded in the register.



Conflict of interest in practice:

- An employee who has influence over procurement decisions has a family member who runs a business supplying goods and services that L&G needs. If the manager were to approve contracts or recommend that the company does business with their family member's firm without disclosing their relationship, it would represent a conflict of interest.
- An employee is a trustee of a charity and they recommend them to receive a financial donation from L&G without disclosing their role with the charity.
- Favouritism in hiring or promotions – if a hiring manager hires a friend or family member over someone more qualified and/or without disclosing their relationship.

Gifts and hospitality

Our Employee Conduct Risk Policy sets out clear requirements aimed at identifying, mitigating and managing the risk that the offer or acceptance of gifts, hospitality and other benefits may constitute an inducement, bribe and/or create a conflict of interest. When offering or accepting gifts or hospitality, care needs to be taken to ensure they are not perceived as an inducement or bribe or create a conflict of interest. Depending on the value of the gift it may need to be logged and approved prior to its offer or acceptance and the policy sets out clear guidance on this.

Risks of gifts and hospitality acceptance in practice:

- An employee who accepts a gift from an external company may feel obligated to favour them in future procurement opportunities, leading to biased decisions that are not in the best interest of L&G.
- Accepting gifts or hospitality can be perceived as bribery which may lead to legal action.

Financial crime

Financial crime can have a devastating impact on its victims and on the economy. We play an important role in deterring criminals from using the financial system to move and disguise money gained from illegal activities. We have a clear and effective Financial Crime risk management framework that ensures the right systems, controls, policies and standards are in place supported by financial crime subject matter experts. The framework reflects eight key financial crime risks: money laundering, terrorist and proliferation financing, sanctions, external and internal fraud, bribery and corruption, failure to prevent the facilitation of tax evasion and market abuse.



As employees of L&G, we all need to take a responsibility for being alert to the various types of financial crime to which we might inadvertently be exposed. We provide mandatory and role specific financial crime training to help you understand the types of financial crimes you may come across in your role and how to detect them. We all have a role in detecting and preventing financial crime and speaking up when required.

Some of the types of financial crime we might be exposed to include (but not limited to):

Fraud

Fraud is a criminal deception that is committed by a person who acts in a false or deceitful way. L&G is exposed to the following fraud risks:

- Internal fraud: Acts intended to defraud, misappropriate property or circumvent regulations, the law, or company policy, which involve at least one internal party.
- External fraud: Acts intended to defraud, misappropriate property, or circumvent the law, perpetrated by a third party.

Given the damaging impact fraud can have, we have designed a series of robust controls to combat external and internal fraud. All employees must adhere to the Group financial crime policy. If you have any concerns about internal or external fraud, please contact either your divisional or the Group Financial Crime team.

Fraud in practice

Fraud risks to L&G might include:

- A third party diverting funds or money that is due to be paid to a L&G customer.
- A third party obtaining a customer's personal information to "take over" an account.
- A member of staff using their L&G system access to process unauthorised payments.

Bribery and corruption

Bribery is the offering, giving or receiving of something of value in exchange for an act that is dishonest, illegal, improper or a breach of trust, e.g. giving or gaining undue influence in a decision-making process.

Corruption can be defined as a lack of honesty and integrity, the misuse or abuse of a position for personal gain. This can also include any benefit enjoyed by someone other than the person involved in the corruption, for example a family member or colleague.

We are firmly committed to maintaining the highest standards of business ethics, honesty, openness, and accountability. As part of this commitment, the offer or acceptance of bribes is unacceptable behaviour for any L&G employee. While our approach is informed by the United Kingdom's Bribery Act, our expectations on employee behaviour in this matter are global.



The following principles apply to the whole of the L&G Group worldwide:

- we will not tolerate corrupt behaviour under any circumstances
- we will not engage in bribery
- we will not tolerate the acceptance of bribes in any of our business activities
- we restrict the giving and receiving of hospitality and gifts
- we prohibit 'facilitation payments'³ across our Group.

If bribery and/or corruption is discovered, L&G will take all appropriate measures to eradicate it and will report illegal activity to law enforcement authorities.

Bribery in practice:

- An employee receives money or a gift from a customer to ensure that their insurance application is accepted.
- A gift is offered to an employee from a supplier to ensure they win a contract even though there are other suppliers that are more appropriate.
- A staff member bribes an external party to help L&G sign a new lucrative business agreement.

³ Some countries allow for small 'facilitation payments' which are made to 'speed up' or 'expedite' a service or action that the payer is legally entitled to. Facilitation payments are illegal in the UK.



Commitment to our people and our culture

Across L&G, it is our shared values, beliefs, behaviours and attitudes that shape our culture and make us who we are.

We recognise our people are central to us delivering our strategic objectives.

Bullying and harassment

We are committed to fostering an inclusive workplace where everyone is valued and treated with dignity and respect. We have a zero-tolerance approach to any act of bullying, harassment, sexual harassment, discrimination, or victimisation whether it occurs in or outside the workplace, including on business trips or work-related social events, or online (including via email or social media).

This approach applies whether it's between employees or in interactions with contractors, customers, clients, suppliers or anyone else engaged to work with L&G. Our policies outline our expectations and our commitment to preventing and responding to any unwanted conduct.

We will thoroughly investigate and address any complaints, including about third parties. We expect all individuals who work with or for us in any capacity to adhere to the same standards that we uphold for our employees. Our goal is to ensure a safe, supportive, and respectful environment for everyone.

Health and safety

We recognise and accept our responsibility to provide safe and healthy working conditions for all our employees, contractors and visitors. Given the breadth of our operations, our approach to health and safety is tailored according to the role and activity being undertaken to ensure we are acting proportionately, ethically, and responsibly. We work in partnership with stakeholders. In the UK, this includes Unite, our union.

We follow all the laws, rules and regulations that apply to us, and we're always looking for ways to keep improving our Health and Safety standards. As part of our Health and Safety policy, we've set out the following key objectives:

1. We will maintain adequate control of the Health and Safety risks arising from our working activities
2. We will provide regular Health and Safety information, instruction and training that is relevant, impactful, and accessible to the audience
3. We will maintain a transparent and co-operative environment that enables two-way communication on Health and Safety matters, through consultation with (but not limited to) employees, contractors, regulating authorities, and where applicable, Unions and Works Councils in the locations in which we operate
4. We will take all reasonable steps to prevent accidents and cases of work-related ill health resulting from our activity
5. We will continue to develop and signpost initiatives that enhance the wellbeing of our people, supporting them to be at their best
6. We will regularly report on safety performance through internal and external governance routes with executive sponsor oversight



7. We will maintain healthy and safe environments across our global workplace estate, managed operational assets and construction projects
8. We will provide and maintain safe working equipment that is suitable for the activity at hand
9. We will ensure we have the right subject matter experts, systems and oversight in place to influence Health and Safety performance
10. We will be a responsible client, investor, and joint venture partner, ensuring that any contractors we select are subject to due diligence that confirms alignment with our health, safety and wellbeing principles and expectations

As an employee, we encourage you to share innovative ideas to improve systems and raise awareness. You are also expected to complete a health and safety training module. Any hazards need to be recorded locally, in accordance with local law. There is also a dedicated internal mailbox for you to report hazards and ask for assistance.

Our approach and commitment to Inclusion and Wellbeing (I&W)

We believe a workforce with a broad range of backgrounds and perspectives strengthens decision making, has a greater understanding of our customers and supports improved employee engagement and wellbeing. All of these advantages have the potential to contribute to stronger business performance.

I&W are deeply interdependent. Inclusive cultures support wellbeing by reducing exclusion, bias, and stress, while positive wellbeing directly influences engagement, productivity, absenteeism and retention. By integrating wellbeing into our inclusion agenda, we will be better able to build long-term organisational resilience, which will ultimately prove to benefit our clients, customers and shareholders.

Overall, this holistic, future-focused framework reinforces our commitments to supporting the broad representation of our workforce while better supporting employee experience, organisational performance and sustainable growth.

What does this mean for you?

Our approach to I&W is designed to enable a culture where everyone can succeed. Feeling valued and included enhances job satisfaction and overall wellbeing. It's also beneficial to be surrounded by people with different perspectives and innovative ideas. If you are a manager, remember you play a central role in creating an inclusive culture, whether this is when hiring new talent or managing existing teams. When hiring, we expect you to work with HR teams to ensure we are hiring inclusively.

Employee representation: UK

In our core UK business, we recognise Unite as our trade union. Our mutual objective with Unite is to work together to further the success of the business and to achieve fairness and equality in the treatment of employees.



For our UK employees, our collective agreement with Unite is included in employee contracts for those in relevant grades. All our new starters, regardless of grade, receive an induction from Unite as part of their on-boarding. As an employer, we recognise Unite's right to represent its members across a range of issues.

As an employee, if you are a member, you can raise any concern with your Unite representative. Our more senior managerial grades in the UK are represented collectively by an in-house Management Consultative Forum.

Employee representation: outside of the UK

Outside of the UK, we comply with local requirements regarding collective engagement and employee representation. In the European Union, we do not have an employee base of such a size that a European Works Council would be required.



Working with stakeholders

It's important to us that all our stakeholders can expect us to behave fairly and to do the right thing. That's why we hold ourselves and our employees to high standards when it comes to role modelling responsible behaviour.

Achieving good outcomes for our customers

L&G customers are from all walks of life and many different backgrounds, and some need our support more than others. Consequently, we expect you to recognise the role you play in ensuring we always do what's right for our customers, particularly those that are vulnerable.

Our Customer Conduct Risk Policy sets the expectations for all employees to ensure that you always act in the best interests of our customers and deliver good customer outcomes. This includes acting as an honest market participant, complying with all regulatory and legal requirements, and making reasonable adjustments when dealing with vulnerable customers.

The policy sets out various frameworks and requirements which you must follow if you are involved in designing and offering products and services to our customers. These frameworks are regularly updated to reflect evolving regulatory requirements and cover all aspects of customer, conduct and compliance risk.

As an employee, it's important you understand our commitments to our customers which include the following practices:

- offering a broad range of value for money products and services, which are straightforward, easy-to-understand and meet our customers' key financial objectives
- communicating information to customers in a way which is clear, fair and not misleading and meets their information needs
- being transparent about any product risks
- being open and honest with our customers as to why they may have had their product application declined (e.g. for an insurance policy)
- ensuring our information is accessible through different formats and channels
- not putting undue pressure on customers as part of any sales process
- being as transparent as possible with pricing information.

It's important to note with pricing, given the range of products we sell, there is no single approach. For example, for some of our products, our employees receive commission on selling them and for some products, sales commission is banned.

Influencing public policy

When approaching public policy work, we have a set of principles by which we engage government and policy makers. Our public policy principles, which are agreed by the Group Management Committee, are:

1. We make no political donations.



2. We are politically neutral, working with all parties, officials, regulators and other policy organisations in the jurisdictions in which we operate.
3. We work collaboratively both directly and through a range of industry representative bodies.
4. We aim to deliver evidence-based, practical proposals for consideration by policymakers.
5. We aim to be experts and thought leaders: we are an organisation rich in expertise that we're willing to share with those responsible for formulating public policy.
6. We are focused on delivering positive outcomes for customers, shareholders, investment markets, the broader economy and society.

If you are approached by anyone representing any political party in the country where you reside, please inform your manager and/or your public affairs or communications team who will deal with the request accordingly.

Suppliers

We have a complex global supply chain and understand that our actions have far-reaching consequences. We recognise the important contribution suppliers make to our business and expect our employees to treat them fairly and in an ethical manner. We also expect suppliers to act in a fair and equitable manner when conducting their business with us.

Our robust procurement framework allows us to engage with our supply chain effectively and fairly, in a manner that manages risk and promotes value in the best interests of our customers, employees, regulators and shareholders. As part of that framework, our contracts set out the commercial and legal parameters of our engagements with our suppliers including compliance with laws and regulations and provisions to ensure continuity of services and the security of data.

If you are involved in procuring goods and service, please ensure you are aware of your local procurement policies and that you engage with your local / divisional procurement team as relevant. This will ensure the framework we have in place is followed.



Ensuring integrity in our operations

Protecting human rights

As a leading financial services company and major global investor, we understand our ability to influence, lead and drive positive change and we take this responsibility very seriously. This includes a commitment to uphold human rights throughout our operation and supply chain and zero tolerance of labour abuses including modern slavery. Our main annual disclosure on the issue of modern slavery and human rights is our Modern Slavery Statement, which can be found on our website. The statement covers, among other matters:

- how we assess modern slavery and human rights risk in our operation and value chain
- the due diligence we perform
- our policies and practices.

Human rights: our commitment

We are committed to maintaining high standards when it comes to the protection of human rights in our operations and our value chain. We base our approach on standards set by various bodies, of which we are members or whose guidance we follow:

- our overall approach continues to be aligned with the United Nations Guiding Principles on Business and Human Rights
- we have been a signatory and supporter of the UN Global Compact since 2012
- we are a real Living Wage Employer, a Living Pensions Employer (and a member of the Living Wage Foundation).

Depending on your role, you may be asked to undertake a modern slavery and human rights awareness course. This helps us to ensure that any individuals who have potentially higher exposure to modern slavery and human rights issues are equipped to spotting the signs of labour abuse.

Cyber and information security

We have an established information security framework which comprises a suite of policies, standards and guidance that apply across the company. As an employee of L&G, you are expected to undertake mandatory information security training to identify and respond to security threats, as well as understanding how to operate in a secure manner. This helps ensure minimal disruption to our business operations and reduce any risks facing our customers.

For further information please see our Cyber and Information Security Policy on our policies page on our Group website.



Data privacy

Protecting the personal data of customers is extremely important to us. Customers need to be able to trust us with their personal information which often contains sensitive information and be confident that we safeguard their data from unauthorised access, loss or damage, together with ensuring the data is not used in contravention of the legal purpose under which it was obtained. You are expected to undertake mandatory data privacy and protection training which will help you understand your role in sorting, processing and handling customer data.

A failure to meet stakeholder expectations can result in significant reputational damage. We may also be exposed to legal action, regulatory sanction or financial penalty should our approach to data privacy and protection fall below the requirements set out by our regulators and the Information Commissioner's Office (ICO) in the UK.

Ethics and AI

AI is driving a significant wave of innovation that is changing how we work and make decisions at personal, business and societal levels. At L&G, we are already benefiting from the advancements that AI can bring to the workplace as well as innovating with AI to bring value to our customers.

However, as AI adoption accelerates, we recognise that ethical considerations must remain central to how we use, develop, and implement AI solutions. To support this, we've established a cross-divisional AI Governance Programme which works closely with AI Centres of Excellence across the business to explore how AI can improve the way we work and what we deliver for customers, by way of improvements of products, services, and customer outcomes.

The Programme has facilitated the development of a central AI Inventory and intake process that triages AI Use Cases according to their AI Risk level. By working together, we keep a clear, central view of all AI use across L&G, which helps employees use safe, secure and approved AI tools. These efforts also ensure that each AI use case meets our environmental risk tolerances, reduces risk, duplication and gives our people the confidence and freedom to innovate.

Our newly Board-approved AI Risk Taxonomy highlights the ethical risks linked to AI and sets out how we address them.

The Enterprise Transformation Committee, which is a committee of the Board, reviews and endorses the Enterprise Technology Strategy and its implementation plans, which includes data and AI. It also considers the Group's capacity and capability relating to technology, data and AI and change delivery and any plans to address any issues.



Contact us

We will ensure that our Code of Business Ethics and Responsibility is communicated to all our employees and that it is reviewed on a regular basis.

If you have any feedback or queries in respect of this document, please email groupsustainability@landg.com.