

# Group charitable donation policy





# Purpose and scope

Our purpose is clear: 'Investing for the long term. Our futures depend on it'. This refreshed statement, introduced in 2024, shapes everything we do: from the products and services we offer, to where and how we invest capital, to the way we run our business and engage with communities.

Non-profit organisations—such as charities and social enterprises—play a vital role in addressing some of society's most pressing challenges. Businesses like L&G contribute by providing resources that help implement and scale these solutions.

The non-profit sector is large, dynamic, and diverse. We focus our philanthropic efforts on causes and organisations where we can create the greatest impact and in ways that align with our business and matter to our stakeholders.

# The purpose of this document is to help you understand:

- which civil society organisations and causes we prioritise for support
- the eligibility criteria for civil society organisations
- the type of support that we can provide to eligible organisations

This policy should be used in conjunction with other relevant policies such as the group volunteering policy, health and safety policies, anti-bribery and corruption policy, our data protection policies, our code of business ethics and responsibility and the employee conduct risk policy.

# Which civil society organisations do we support and why?

Civil society organisations that we support fall into one of two different categories, depending on the type and scale of the support.

# Category one: strategic civil society partnerships

Includes organisations and causes that are important to us as a business and/or our stakeholders. Organisations we support will be active in one or more of our three priority areas. We will usually seek to partner with organisations for the long-term, co-develop activities, and commit significant financial and non-financial resources to achieve measurable impact.



# **Priority areas**







Occasionally, we will support organisations which sit outside our focus area, but is aligned with commercial objectives, or which enables us to act in a manner consistent with responsible business practices.

Funding decisions are made by L&G's Group Corporate Affairs team, with input from relevant stakeholders across the business when needed.

#### Category two: employee-selected civil society partnerships

This includes organisations that have been selected by our people through our charity match sponsorship, volunteer time match, and other discretionary charitable policies. The range of causes and organisations supported is much broader for this category.

These schemes incentivise our people to use their time, skills and talents to make a difference. The support provided in this second category is primarily financial and time-based, the value is lower, and the approach is transactional, with most employee matching requests representing a one-off donation to their nominated organisation.

Maximum values matched by the business are capped at a discretionary level and subject to review and change at any time. Category two schemes are run at the discretion of the Group Responsible Business and Reputation Strategy team with advice and input from HR and other subject matter experts.

# Eligibility criteria

- Charities registered with the Charity Commission for England and Wales, or the equivalent statutory regulators for Northern Ireland and Scotland respectively
- organisations that are not registered charities, but who operate for community benefit and are constituted in a charitable way. Examples include schools, CICs (Charity Incorporated Companies), and registered societies
- all recipients of charitable funds are reviewed and verified as operating charitably by a supplier retained for this purpose. That supplier is in turn subject to our own quality assurance process.

Ineligible organisations include, but are not limited to:

- Organisations that are not registered charities with a UK statutory charity regulator, or which have not been verified as operating in a charitable way
- organisations that are registered charities, but where annual reporting is late, where the organisation is the subject of an active investigation by a statutory body (for example, Charity Commission, ICO, HMRC), or where people with statutory governance responsibility are on sanctions and/or PEP lists



- where an organisation offers benefits or services (so called VATable supply) in return for a donation
- personal appeals (for example, donations to individuals to self-fund overseas medical care)
- sponsorship requests of any kind are not eligible for charitable support
- donations that may constitute an inducement, bribe, and/or create a conflict of interest. See Legal and General Group employee conduct risk policy for guidance
- organisations that may be legally constituted charities in the UK, but where activities risk violating human rights or international laws. See Appendix 1: Enhanced guidance below.

# Internationally registered civil society organisations

We may occasionally support a civil society organisation that is legally constituted in another country. Additional eligibility criteria will apply when this situation arises:

- Where a donation to an internationally constituted civil society organisation is requested, there must be a connection between the business and that country. For example, employees based in Bermuda or Ireland requesting match sponsorship for money they have raised for a registered charity in Bermuda or Ireland
- an internationally constituted civil society organisation must be registered with that country's statutory regulator for charities. Unlike a CIC or registered society in the UK, organisations that are constituted in a charity-like way but are not registered charities are not eligible
- no-go countries: our verification supplier maintains a list of no-go countries who have been sanctioned or where satisfactory due diligence is not possible. We will not provide any support to organisations based in these countries, nor to any organisation which may be eligible but where the end user of donated funds operates in a no-go country.

L&G businesses in the United States are responsible for selecting and verifying the civil society organisations that they support



# Appendix one: enhanced guidance

There are rare cases where the activities of a legitimate charitable organisation risks breaking laws or violating human rights. L&G will follow the enhanced guidance published by the Charity Commission for England and Wales where such risks arise.

#### Examples include:

- Advancing religion internationally: advancing religion, for example through proselytising, has been determined a legal charitable purpose by the Charity Commission for England and Wales but may be illegal in some countries
- where there is a risk of damage to mental or physical health: withholding, on religious grounds, medical treatment without consent, or of vulnerable people or children
- promoting hatred or threats of violence against people of different religious or ethnic background
- restricting a person's freedoms: for example, where adherents live in a religious community without the freedom to exercise personal choice, or where a community organisation's mission conflicts with our commitment to creating an inclusive and diverse society.