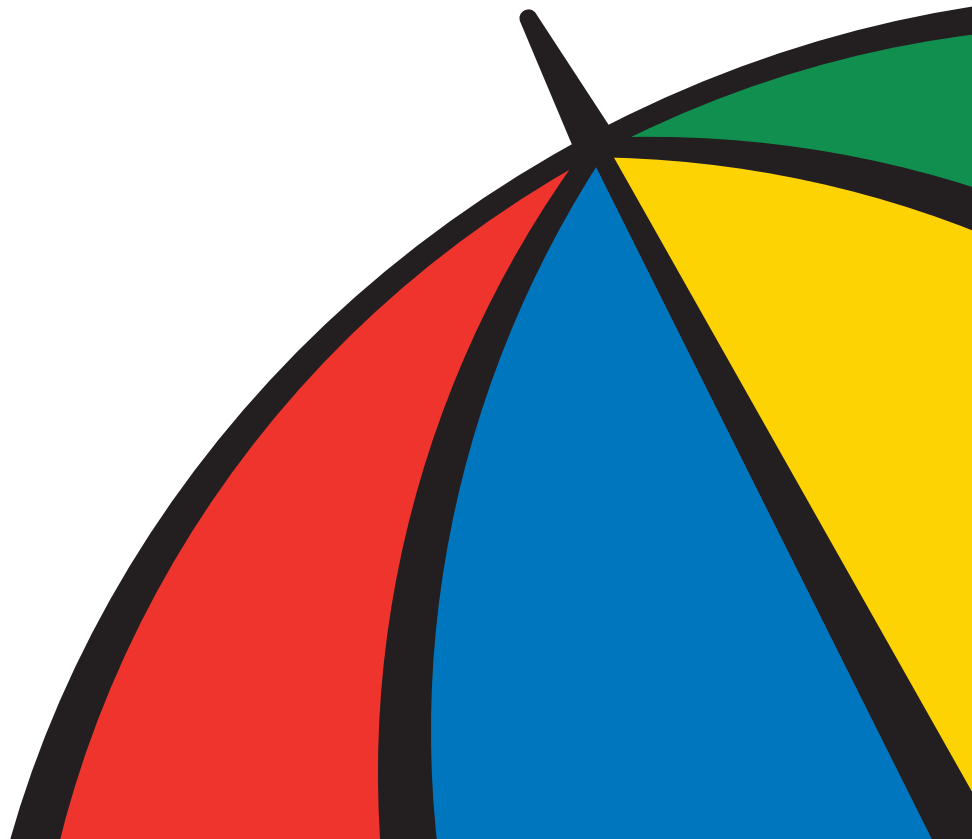


Group charitable donation policy

2024



Purpose and scope

Doing the right thing for our people, customers, investors, and communities shapes how we run our business. We call this guiding principle Inclusive Capitalism. One way in which we realise our vision is working with civil society organisations.

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 we can provide to eligible organisations.

This document applies to the following Legal & General companies:

- Legal and General Group Plc.
- Legal and General Resources Ltd.
- Legal and General Affordable Homes
- Legal and General Investment Management (Holdings) Ltd.

This policy should be used in conjunction with other relevant policies, for example, the group volunteering policy, our health and safety policies, the anti-bribery and corruption policy, our data protection policies, our code of conduct 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, or the motivation.

Category one: corporate 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

Promoting long-term
financial wellbeing



Creating better
communities in which to
live and work



Game-changing
environmental solutions



Occasionally, and at the discretion of the Group Sustainability team, we will choose to support a civil society organisation whose mission is focused on a social or environmental issue which sits outside one of the priority areas, but which is aligned with our commercial objectives, or which enables us to act in a manner consistent with responsible business practices. An example would be a partnership to promote the inclusion of people from protected characteristic groups, in line with our diversity and inclusion ambitions.

We fund partnerships from our group-wide sustainability budget. Decisions on partnership funding are made by our Group Sustainability team which is advised by an interdepartmental steering group.

Category two: employee-selected civil society partnerships

Includes organisations that have been selected by our people through our charity match sponsorship, volunteer time match, or charity trustee/school governor grant schemes. These schemes incentivise our people to leverage their time, skills, and talents to make a difference in their communities.

With this second category, the support provided is primarily financial or time-based, the scale 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 at any time.

Category two schemes are run at the discretion of the Group Sustainability team and are subject to the advice of an interdepartmental steering group and the Group Human Resources Leadership Team. They are also subject to review at any time.

Eligibility criteria

Eligible organisations are:

- Charities registered with the Charity Commission for England and Wales, or the equivalent statutory regulators for Northern Ireland and Scotland respectively.
- Or, organisations that operate for community benefit and are constituted in a charitable way but are not registered charities. Examples include schools, CICs (Charity Incorporated Companies), and registered societies. The decision as to whether an organisation qualifies is made by an external supplier retained for this purpose.
- Comprehensive due diligence and verification of all recipients of charitable funds is undertaken by the aforementioned supplier. That supplier is in turn subject to our own annual quality assurance process.

Ineligible organisations include, but are not limited to:

- Organisations that are not registered charities with a UK statutory regulator, or which are not 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 regulator (for example, Charity Commission, ICO, HMRC), or where people with statutory governance responsibility are found to be on sanctions and/or PEP lists.
- Eligible organisations where a donation is given in return for a VAT-able service¹.
- Personal appeals (for example, donations to individuals to self-fund overseas medical care).
- Sponsorship requests of any kind.
- 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, but where activities risk violating human rights or international laws. **See Appendix 1: Enhanced guidance below.**

¹ A donation given in return for goods or services should be treated like any other supplier relationship and the group procurement policy must be followed.

Internationally registered civil society organisations

We may occasionally decide to support a civil society organisation that is legally constituted in another country. When this need arises, additional eligibility criteria will apply:

- 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 for civil society organisation 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 is in a no-go country.

Business units in the United States are responsible for selecting and verifying the civil society organisations that they support.

Types of support we provide

- Money in the form of charitable donation (as noted above, a charitable donation in return for goods or services is not permitted).
- Time in the form of paid time off for employees to volunteer.
- Other gifts in kind, for example, office space/facilities or knowledge/expertise. All relevant complementary policies and procedures must be adhered to, for example, health and safety when providing office space on a gift in kind basis.

Appendix 1: Enhanced guidance

There are rare cases where the activities of a legitimate charitable organisation risks breaking laws or violating human rights. Legal and General Group will follow the enhanced guidance published by the Charity Commission for England and Wales where there is a risk of such cases arising.

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.