Module: Introduction

Page: Introduction

CC0.1

Introduction
Please give a general description and introduction to your organization.

Old Mutual provides life assurance, asset management, banking and property & casualty insurance to more than 16 million customers in Africa, the Americas, Asia and Europe. Originating in South Africa in 1845, Old Mutual has been listed on the London and Johannesburg Stock Exchanges, among others, since 1999. In the year ended 31 December 2013, the Group reported adjusted operating profit before tax of £1.6 billion (on an IFRS basis) and had £294 billion of funds under management from core operations.

CC0.2

Reporting Year
Please state the start and end date of the year for which you are reporting data.
The current reporting year is the latest/most recent 12-month period for which data is reported. Enter the dates of this year first.
We request data for more than one reporting period for some emission accounting questions. Please provide data for the three years prior to the current reporting year if you have not provided this information before, or if this is the first time you have answered a CDP information request. (This does not apply if you have been offered and selected the option of answering the shorter questionnaire). If you are going to provide additional years of data, please give the dates of those reporting periods here. Work backwards from the most recent reporting year.
Please enter dates in following format: day(DD)/month(MM)/year(YYYY) (i.e. 31/01/2001).

Enter Periods that will be disclosed
Tue 01 Jan 2013 - Tue 31 Dec 2013

CC0.3

Country list configuration

Please select the countries for which you will be supplying data. This selection will be carried forward to assist you in completing your response.

Select country
Austria
Bermuda
Botswana
Colombia
France
Germany
Italy
Kenya
Malawi
Mexico
Namibia
Poland
South Africa
Swaziland
United Kingdom
United States of America
Zimbabwe
Isle of Man
Nigeria
Switzerland
United Arab Emirates

Select country
Hong Kong
Ireland
Luxembourg
Singapore

CC0.4

Currency selection

Please select the currency in which you would like to submit your response. All financial information contained in the response should be in this currency.

GBP(£)

CC0.6

Modules

As part of the request for information on behalf of investors, electric utilities, companies with electric utility activities or assets, companies in the automobile or auto component manufacture sectors, companies in the oil and gas industry, companies in the information technology and telecommunications sectors and companies in the food, beverage and tobacco sectors should complete supplementary questions in addition to the main questionnaire.

If you are in these sectors (according to the Global Industry Classification Standard (GICS)), the corresponding sector modules will not appear below but will automatically appear in the navigation bar when you save this page. If you want to query your classification, please email respond@cdp.net.

If you have not been presented with a sector module that you consider would be appropriate for your company to answer, please select the module below. If you wish to view the questions first, please see https://www.cdp.net/en-US/Programmes/Pages/More-questionnaires.aspx.

Further Information

Please find attached the 2013 Old Mutual Annual Report and Responsible Business Report

Attachments

https://www.cdp.net/sites/2014/07/13807/Investor CDP 2014/Shared Documents/Attachments/InvestorCDP2014/CC0.Introduction/Old Mutual 2013 Annual Report and Accounts.pdf
https://www.cdp.net/sites/2014/07/13807/Investor CDP 2014/Shared Documents/Attachments/InvestorCDP2014/CC0.Introduction/Old Mutual 2013 Responsible Business Report.pdf

Module: Management

Page: CC1. Governance

CC1.1

Where is the highest level of direct responsibility for climate change within your organization?

Individual/Sub-set of the Board or other committee appointed by the Board

CC1.1a

Please identify the position of the individual or name of the committee with this responsibility

Patrick O'Sullivan, the Board Chairman, has overall responsibility for climate change at Group level. Don Schneider, Director of Human Resources, is the Group Executive Committee member with responsibility for reviewing the progress and status of objectives regarding climate change. The internal climate change performance of the business is Don's responsibility and he chairs our Responsible Business Committee (RBC), which was established in 2009 to provide leadership and direction for the Group on the risks and opportunities related to our social and environmental impacts, including climate change. The RBC reports directly through Don Schneider into the Group Executive Committee and the Board. Updates, which include material issues relating to climate change, are given at least twice a year to the Group Executive Committee and twice a year to the Board

CC1.2

Do you provide incentives for the management of climate change issues, including the attainment of targets?

Yes

CC1.2a

Please provide further details on the incentives provided for the management of climate change issues

Who is entitled to benefit from these incentives?	The type of incentives	Incentivized performance indicator
Corporate executive team	Monetary reward	For the Group Director of Human Resources, who chairs the Group Responsible Business Committee, management of Responsible Business issues, including climate change, are included in his objectives.
Other: Environment/sustainability managers	Monetary reward	The Group Responsible Business Team have monetary incentives linked to the management of climate change initiatives. Targets are set across a range of areas including internal climate change awareness, environmental management plans and monitoring of Key Performance Indicators including Group GHG reduction targets.
Facility managers	Monetary reward	Buildings and facilities managers have energy management and reduction targets within their individual performance targets.
Other: Nedbank employees	Monetary reward	Incentives for employees include monetary incentives - the performance indicators include the greenhouse gas (GHG) reduction targets included in employee performance scorecards. The achievement of the targets positively impacts employees' bonuses or discretionary pay. Hence there exists a strong incentive to reach GHG targets. Other forms of recognition and prizes are also used to help drive the Nedbank green agenda

Further Information

Page: CC2. Strategy

CC2.1

Please select the option that best describes your risk management procedures with regard to climate change risks and opportunities

Integrated into multi-disciplinary company wide risk management processes

CC2.1a

Please provide further details on your risk management procedures with regard to climate change risks and opportunities

Frequency of monitoring	To whom are results reported	Geographical areas considered	How far into the future are risks considered?	Comment
Six-monthly or more frequently	Individual/Sub-set of the Board or committee appointed by the Board	All geographical areas of our business are covered in our risk management procedures	> 6 years	

CC2.1b

Please describe how your risk and opportunity identification processes are applied at both company and asset level

Old Mutual operates an integrated Group and Business Unit level risk identification and management process.
At Group level, risk is monitored by the Group Executive Risk Committee (GERC) comprised of senior Group Executives from Risk, Actuarial, Capital, Governance & Compliance, Internal & External Audit. The GERC reviews & oversees Group's top risks quarterly ensuring they are at an acceptable level & in line with Group strategy. Risk is a core part of the business planning process & all plans are assessed & aligned with Group's strategy & risk appetite. Issues across the Group are escalated immediately to the relevant level based on materiality to quickly & effectively remediate risks as they arise.
Alongside this the Responsible Business Committee (RBC) operates a complementary process in which climate change related risks/opportunities are identified & addressed across the Group. This provides a robust system for maintaining day to day management of climate change issues, & a route to raise, discuss & escalate new opportunities as they arise.
The Group Operating Model and policy framework provides the governance mechanism for Group to oversee the implementation & embedding of the Responsible Business Policy & Enterprise Risk Management policy at business unit level via a letter of representation process, compliance with which is assessed biannually. Each business has in place Risk Committees and Risk & Control Self-Assessment Processes, which capture, escalate & report risk events as they arise. Risks are regularly reviewed & if required, remedial action plans are implemented. At Nedbank we use The Equator Principles as a credit risk management framework to determine, assess & manage environmental & social risk in Project Finance transactions.

CC2.1c

How do you prioritize the risks and opportunities identified?

At the top level our risk strategy guides the way we take on risk, and how risk is prioritised, in the course of running our business and in unlocking value for all stakeholders. It is a core component of our business strategy, and is influenced not only by the available economic capital and earnings at risk, but also by reference

to factors such as the Group's customer focus, potential opportunities and leveraging core skills and competencies across the Group.
Risk is a core part of the Group and business planning process & all plans are assessed & aligned with the Group's strategy & risk appetite with the Group strategy helping us to prioritise these risks and opportunities. All risk categories are assessed against their associated risk appetite levels, resulting in mitigation strategies or opportunities that are further explored. Each business unit has risk appetite limits and monitors exposures against these. When new opportunities present themselves their potential impact in terms of risk (including non-financial impacts) and the effect on capital are assessed within the respective businesses cases.
All business units assess risks using a Risk Control Self-Assessment (RCSA) process, a key component of the Old Mutual Risk Framework, where potential exposures are assessed using an impact (very high, major, moderate, minor, low) and likelihood (rare, possible, probably, likely, almost certain) scale which is tailored to each business area. Each Business' RCSA takes into consideration any controls or other mitigation put in place to manage the risk, including internal and external stakeholder engagement which helps prioritize the risk. Risks are assessed on a gross and net (taking consideration of controls) basis. If the level of risk is unacceptable management actions will be implemented to reduce the risk. As with all risks and opportunities climate change risks are incorporated within the RCSA process

CC2.1d

Please explain why you do not have a process in place for assessing and managing risks and opportunities from climate change, and whether you plan to introduce such a process in future

Main reason for not having a process	Do you plan to introduce a process?	Comment

CC2.2

Is climate change integrated into your business strategy?

Yes

CC2.2a

Please describe the process of how climate change is integrated into your business strategy and any outcomes of this process

The business strategy is updated on a rolling basis & revalidated on a 3 year rolling basis by the Group Strategy Team under the leadership of the Group Strategy Director. Strategy updates are signed off by the Group Executive Committee. The Business units update their local business strategies in an ongoing process which undergoes an annual strategy review to ensure it aligns to the Group strategy. Internal & external stakeholder engagement allows us to understand their needs and expectations of our business helping us balance these needs with our business objectives effectively through our strategy.
Increasing energy costs & carbon-related legislation & fluctuations in temperature have all affected our large property portfolios. Extreme weather events have cost our insurance business through increased claims & increasingly our businesses are finding that climate change is effecting their actuarial calculations which are adjusted accordingly. Changes in availability & distribution of natural resources are impacting the supply chains & running of businesses in which we invest.
Increasing pressure from our stakeholders to understand the carbon impact of our investments alongside understanding to what extent, & how, climate change impacts or enhances the value of our investments is proving crucial in allowing us to retain an advantage over our competitors. In banking, increased publicity around climate change has driven customer demand for climate conscious products. Product solutions teams across our businesses have increased the development of these products to meet demand.
We developed a Group Climate Change Strategy to help us reduce our carbon impact & improve our energy efficiency. Our Carbon Taskforces across the Group help implement the strategy at a business unit level helping to deliver our target & build on the existing carbon reduction activity we already have going on around the Group. In 2013 we welcomed a new Head of Responsible Business to our Old Mutual Emerging Markets (OMEM) business to help drive carbon reduction initiatives across the Group alongside helping to manage, expand & improve the environmental data collection process within OMEM which makes up over 80% of our total Group footprint. The Head of Responsible Business reports directly into OMEM's Head of Strategy helping integrate the Responsible Business agenda into OMEM's business strategy. In 2013 we rolled out a new data sign off process which requires all environmental data to be signed off quarterly by Financial Directors in each business which has helped us increase the focus & importance of the non-financial data that we report across the Group. Whilst there is already some independent verification of our carbon emissions across our different businesses, in 2013 our Group carbon data underwent an independent readiness review in preparation for putting all of our carbon data through external verification in the next few years.
In 2013 we revisited our Group Strategy & from 2014 one of our Group's Big Five Strategic Priorities is 'to be recognised as a leader in Responsible Business'. Our Responsible Business Strategic Priority underpins our four other Big Strategic Priorities for growing & transforming our businesses. By incorporating Responsible Business explicitly into our Group strategy, we are better positioned to strategically manage our group-wide & business level impacts on climate change. Climate change has also impacted the way we manage & incorporate environmental factors into our investment decision making practices. In 2013 we published our Group Responsible Investment Standard to help integrate & raise awareness of the need for responsible investing & the role that we play as an investor on society and the environment. In South Africa, the core market in which we operate, we are committed to driving sustainable long-term carbon-efficient growth through our investments in renewable energy e.g. the Green Economic Growth project. In 2013 we set a long term strategic goal to have 100% of our listed equity holdings across Old Mutual Emerging Markets voted by 2016.
We are members of various groups across the world that help us share best practice in the financial services sector & learn from emerging knowledge on the impacts of climate change. These include Nedbank's participation in the UN Environment Programme Finance Initiative and the Group's commitment to the UN Global Compact.
Climate change is widely recognised as the greatest environmental challenge facing the world today. By integrating climate change into our core business strategy, we not only mitigate the risks that they represent, making us more resilient & better equipped for a more carbon constrained future, but we are able to exploit the opportunities they present:
- Being a responsible business with regard to climate change and a business that participates in voluntary engagement around carbon reduction supports the maintaining of our licence to operate across our markets
- Our work to influence policy, investing in research into climate change & sharing best practice means that Old Mutual can shape policy as opposed to be subject to it & be a business that is better prepared for a carbon constrained future
- Our focus on responsibly managing our investments means we are able to take advantage of the opportunities of new investment markets & product opportunities such as debt and equity investments in the SA Renewables Programmes. It means we are also able to offer our customers & clients environmentally responsible products retaining an advantage over our competitors
- Our more efficient building stock directly reduces our operational costs and increases the value of our property investment portfolios. Gains accrued as a result of operational savings allows us to pass on increased returns and dividends to our customers & shareholders.

- We are able to attract and retain motivated, high calibre employees who are increasingly attracted to organisations with a strong reputation as a responsible business that cares about people & the environment
Old Mutual supports long term regulatory action around the setting of clear mandatory, medium & long-term emission reduction targets. We will continue to set & meet our emission reduction targets. We have formalised Responsible Investment governance structures across the Group which delegate responsibility from the Group RI Committee to business level RI committees and roll out RI activities across the Group. We have implemented Responsible Investment Guidelines across our investment businesses for the incorporation of ESG criteria into investment decisions. We continue to be signatories of the UN-backed Principles for Responsible Investment. And Nedbank continues to maintain its carbon neutral status which is central to its business strategy to address climate change through managing its own impact.

CC2.2b

Please explain why climate change is not integrated into your business strategy

CC2.3

Do you engage in activities that could either directly or indirectly influence public policy on climate change through any of the following? (tick all that apply)

Direct engagement with policy makers
Trade associations
Other

CC2.3a

On what issues have you been engaging directly with policy makers?

Focus of legislation	Corporate Position	Details of engagement	Proposed legislative solution
Climate finance	Support	Old Mutual Investment Group South Africa (OMIG(SA)) was actively involved in the implementation of the Code for Responsible Investing in South Africa (CRISA) and in 2013	For Old Mutual the integration of social, environmental and governance factors into investment decisions is about quantifying the impact of global changes on our financial return

Focus of legislation	Corporate Position	Details of engagement	Proposed legislative solution
		OMIG(SA) continued to support the process of implementation within the industry. Jon Duncan, Head of Sustainability Research and Engagement at OMIG(SA) is a member of the CRISA Committee. He attends Committee meetings and participates in ongoing discussions.	so that potential risks and opportunities are managed. Our role on the CRISA Committee has helped encourage the integration of climate change considerations into the Code for Responsible Investing South Africa
Carbon tax	Support	In 2012 Old Mutual South Africa provided feedback on the South African Government's proposed Carbon Tax as part of its consultation process. In 2013, the consultation process continued as the tax has been delayed pending further research. Our interaction has been mainly focused through meetings, email correspondence and written feedback.	Old Mutual is committed to seeing South Africa make the successful transition into operating as a less carbon intensive economy. The Carbon Tax should encourage growth in the renewable and green energy sector which will support this transition
Other: Carbon pricing	Support	In 2013 Old Mutual continued its work in supporting the Carbon Price Communiqué which calls for global policies and action to tackle climate change. Correspondence occurs through being a signatory	The Carbon Price Communiqué makes the case for setting a price on carbon emissions as one of the main building blocks of an effective and ambitious climate change policy framework. By being a signatory, Old Mutual commits to this case
Climate finance	Support with minor exceptions	In 2013, Nedbank continued to engage various government departments and external stakeholders to advocate more sanctioned renewable energy projects. These interactions happen as meetings and through correspondence such as email	That an enabling environment should be created to finance more transactions like renewable energy projects

CC2.3b

Are you on the Board of any trade associations or provide funding beyond membership?

Yes

CC2.3c

Please enter the details of those trade associations that are likely to take a position on climate change legislation

Trade association	Is your position on climate change consistent with theirs?	Please explain the trade association's position	How have you, or are you attempting to, influence the position?
South African Insurance Association (SAIA)	Consistent	The SAIA in 2012 established The Environmental and Social Risks Board Committee which oversees strategic initiatives in support of the top ten environmental and social risks the Committee has identified as central to the insurance industry in South Africa. In 2013, Old Mutual continued its support of the Board Committee. The SAIA position and contribution towards climate change aims to support action to help reduce the industry's impact on the environment through identifying and analysing environmental risks, social risks, and their potential negative impact.	Old Mutual sits on the board of the SAIA and in 2014 we aim to continue to engage in The Environmental and Social Risks Board Committee more heavily
Green Building Council of South Africa	Consistent	The Green Building Council of South Africa aim to lead the transformation of the South African property industry to ensure that all buildings are designed, built and operated in an environmentally sustainable way allowing South Africans to work and live in healthy, efficient and productive environments	Brent Wiltshire of Old Mutual Investment Group SA sits on the Board and influences where possible the transformation of the South African property industry encouraging the growth of green buildings and sustainable construction
National Business Initiative (NBI)	Consistent	The NBI South Africa believes that the integrity of the country's eco-system should be protected and that climate change and energy are no longer purely of environmental concern but are becoming an important issue in economics and sustainable business. NBI, therefore, aims to mobilise business as a whole towards the formulation of a business climate change response strategy through: increased awareness, voluntary collective action, policy engagement, mitigation activities, adaptation, and promotion of capacity building initiatives through partnerships	Thabani Jali, Group Executive at Nedbank sits on the Board of the NBI and on the NBI Social and Ethics Committee. In each of these positions Nedbank aims to push and drive the green agenda and to have a positive impact on climate change
South African Property Owners Association (SAPOA)	Consistent	SAPOA encourages participation to promote the expansion of South Africa's commercial and industrial property sectors. One of SAPOA's aims is to provide an efficient forum for responding to change. In 2014, SAPOA signed a MoU with the South African Cities Network. The partnership aims to establish forums which the private and public sector can build consensus on a range of issue areas including climate change. One of its affiliates is the Green Building Council of South Africa	Old Mutual Property is represented at board level of the Trade Association and seeks to share its experience of creating and championing environmentally efficient buildings in the forum
UNEP Finance Initiative - Innovative financing for sustainability	Consistent	The UNEP Finance Initiative brings together financial institutions to encourage the finance industry to examine and reduce the negative impacts the sector has on the environment. The initiative helps engage businesses on the effects their organisations have in contributing to	Our Group Head of Responsible Business is on the working group for the UNEP Finance Initiative for GHG protocol. In her role she seeks to drive progression and the climate change

Trade association	Is your position on climate change consistent with theirs?	Please explain the trade association's position	How have you, or are you attempting to, influence the position?
		climate change and proposes ways they can help reduce this impact	agenda in the finance sector forwards

CC2.3d

Do you publically disclose a list of all the research organizations that you fund?

CC2.3e

Do you fund any research organizations to produce or disseminate public work on climate change?

CC2.3f

Please describe the work and how it aligns with your own strategy on climate change

CC2.3g

Please provide details of the other engagement activities that you undertake

Some affiliates of our business in America are involved with local organisations that promote sustainability in areas that relate to our assets. For example, timber affiliates are involved with the Sustainable Forestry Initiative (SFI) which is an independent, nonprofit organization dedicated to promoting sustainable forest management. SFI works with conservation groups, local communities, resource professionals, landowners, and countless other organizations and individuals to promote responsible forest management.
In 2013 Old Mutual South Africa (OMSA) continued to support a research project at the University of Cape Town (UCT) on 'Risks and vulnerabilities that global environmental change poses for the insurance industry'. As part of supporting this project researchers at UCT conducted a series of internal interviews within the Old Mutual Group in 2013 to understand how existing awareness of environmental change has emerged - continues to emerge - and consequently how this is, or is

not, being translated into action across Old Mutual. The results will be published in an academic paper and findings, if applicable, will be integrated into OMSA's business practices.
In 2013 Old Mutual Wealth Management UK continued to support Southampton University students in conducting a review of our position in respect of the ISO 14001 Environmental Management System as part of their course research and study. The results of the student's findings have been shared in presentations internally, and subject to business approval, we intend to work towards ISO14001 accreditation following an audit of their information.

CC2.3h

What processes do you have in place to ensure that all of your direct and indirect activities that influence policy are consistent with your overall climate change strategy?

The businesses are required to ensure that all climate change policy activities are aligned with the overall Group strategy. Every six months a Letter of Representation is circulated to the businesses for them to confirm that they have received, understood and are implementing the Responsible Business Policy. The Letter of Representation is completed by the businesses and reported back to the Group Head of Responsible Business who reviews their points of compliance and returns their letter with actions for completion. This systematically ensures that all areas of the business are compliant with the Responsible Business Policy. A further level of assurance is the Responsible Business Committee who are accountable for ensuring the Responsible Business Policy is upheld across the Group. In 2013 we recruited a Head of Responsible Business in Old Mutual Emerging Markets (OMEM). Her role adds an additional level of governance within our largest business unit and along with a new Responsible Business Manager for OMEM they are able to co-ordinate all policy related and stakeholder activities and feed into the Group Head of Responsible Business on a weekly basis.

CC2.3i

Please explain why you do not engage with policy makers

Further Information

Page: CC3. Targets and Initiatives

CC3.1

Did you have an emissions reduction target that was active (ongoing or reached completion) in the reporting year?

Intensity target

CC3.1a

Please provide details of your absolute target

ID	Scope	% of emissions in scope	% reduction from base year	Base year	Base year emissions (metric tonnes CO2e)	Target year	Comment

CC3.1b

Please provide details of your intensity target

ID	Scope	% of emissions in scope	% reduction from base year	Metric	Base year	Normalized base year emissions	Target year	Comment
Int1	Scope 1+2	27%	20%	metric tonnes CO2e per FTE employee	2010	4.17	2020	Employee occupied properties include all locations where Old Mutual employees are based and operate from. As per our operational control approach, we include 100% of employees and emissions in our calculations, even in areas where we do not own 100% of the business (such as Nedbank). In 2010, Scope 1 + 2 emissions were 232,465 tCO2e with 55.730 employees
Int2	Scope 1+2	73%	20%	metric tonnes CO2e per square meter	2010	0.21	2020	The data concerning investment property portfolio including base year emissions relates purely to current properties, to ensure any reduction figure is accurate and not related purely to removal of properties. The portfolio includes the property asset management business and properties invested in and managed to create value and client returns. In 2010, Scope 1 + 2 emissions were 567,929 tCO2e across 2,684,430 m2.

CC3.1c

Please also indicate what change in absolute emissions this intensity target reflects

ID	Direction of change anticipated in absolute Scope 1+2 emissions at target completion?	% change anticipated in absolute Scope 1+2 emissions	Direction of change anticipated in absolute Scope 3 emissions at target completion?	% change anticipated in absolute Scope 3 emissions	Comment
Int1	Decrease	20			Provided the number of employees across Old Mutual Group remains steady, in order to achieve a 20% reduction using this intensity metric, we anticipate we would need to reduce our absolute emissions by 20%. We are aware that an increase in employee figures due to acquisitions would impact this.
Int2	Decrease	20			The size of the Old Mutual Property Portfolio is likely to decrease over the next few years, which will have an impact on the total absolute emissions for the Group. The exact size of this reduction has yet to be determined, however it will likely be a large number of smaller properties, rather than our larger properties.

CC3.1d

For all of your targets, please provide details on the progress made in the reporting year

ID	% complete (time)	% complete (emissions)	Comment
Int1	30%	0%	This year, Old Mutual increased our emissions in employee-occupied properties by 1.9% to 4.25 tCO_2e per full time employee (2010: 4.17 tCO_2e per full time employee). We believe this is due to improved data collection and accuracy resulting in a fuller disclosure.
Int2	30%	0%	Across our property portfolio, we increased our emissions by 9.5% to 0.23 tCO_2e per metre squared (2010: 0.21 tCO_2e per metre squared). This is primarily due to increased occupancy in our properties leading to an increase in emissions without a corresponding increase in floor space.

CC3.1e

Please explain (i) why you do not have a target; and (ii) forecast how your emissions will change over the next five years

CC3.2

Does the use of your goods and/or services directly enable GHG emissions to be avoided by a third party?

Yes

CC3.2a

Please provide details of how the use of your goods and/or services directly enable GHG emissions to be avoided by a third party

Providing energy efficient buildings for our tenants: Old Mutual Property (OMP) has over £1 bn AUM, with over 54 buildings over a 967,816m2 gross lettable area. OMP has a green building strategy which provides us with a structured approach to improving the environmental sustainability of the buildings in our existing portfolio & ones we are constructing. Significant savings have been achieved. E.g. New materials, design, location selection, technology & management techniques all help reduce emissions from our own operations & those of our tenants which we are doing through advanced air-conditioning controls, high efficiency lighting replacement initiatives, timers, zone-sensor lighting & natural daylight adjustment. We are always working to improve the environmental performance of our buildings by refitting existing units & building or leasing more carbon friendly ones. By adopting this holistic approach to how we manage the environmental impact of our property portfolio we are helping our tenants make substantial carbon savings. The overall total carbon savings as a result of improving the energy efficiency of our SA property portfolio buildings is estimated at 1050kWh/3297.25 tons of Co2e a year. Working with others to reduce our emissions: At Mutual & Federal in 2013 we re-signed a 'green addendum' as part of the lease with our landlord whereby both parties agreed to work together to reduce energy & water use in the building. Reducing the environmental impact of our investments: Our investment decisions have the potential to have negative or positive impacts on the environment, society & the communities where the investments are based, these include climate change related impacts. Across the Group we make investments that aid the long-term transition from a carbon-intensive economy to more efficient low-carbon alternatives. During 2013 we developed our Responsible Investment standard to support a coordinated & consistent approach to the governance of our responsible investments across the Group, improved the governance structure of the Responsible Investment Committee & rolled out our Responsible Investment Standard to integrate these decision making behaviors across the Group. Encouraging our suppliers to reduce their environmental impact: All new suppliers go through the Business Units' due diligence process. This is a detailed & extensive questionnaire that relates to all areas of Responsible Business including climate change (see questionnaire attached). New suppliers are questioned on how they integrate environmental management systems, measure their own impact & suggested ways they can help improve Old Mutual’s environmental impact. In 2013 Old Mutual Wealth UK set about applying for ISO1401 to certify their supply chains. The ISO propositions include the creation of a more proactive environmental management process. In the UK Old Mutual conducts regular travel management meetings with suppliers throughout the year, our IT suppliers fall under the general due diligence questionnaires & we are working with key suppliers to implement WEE directives. Consolidated deliveries are a business as usual practice across the Group. Helping our retail banking customers reduce GHG emissions: At Nedbank we offer the following services & products that specifically enable our customers to avoid or offset GHG emissions: Reduced travel to branch outlets (through use of internet banking & mobile banking - This could form part of Scope 1 emission reductions.

Reduced paper use by clients due to electronic client statements and advices. Expansion of Automated Teller Machine(ATM) and Self Service Terminals(SST) network – this cuts down on the required client transport (and their scope 1 emissions). Client option for receipt-free transactions at ATM's and SST's. Estimation of avoided emission including timescale over which emissions are avoided or baseline year: saving 6 200 tCO2e per annum from the 2007 baseline year. Highest benefit from these initiatives are expected in rural communities, where access to banking services is frequently remote and very inconvenient. Methodology assumption: Based on 25 000 people using electronic channels 4 times per month & avoiding a 20km round-trip by Minibus Taxi. The result is that approximately 24 000 000 passenger km per year is reduced. This equates to a reduction of more than 1 700 000 taxi round trips. A value of 0.21 kgCO2e/vehicle km was assumed based on information from DEFRA emission tables. The result is that more than 5 200 tCO2e is reduced from travel alone. Taking electricity use & reduced paper consumption into account ought to increase the offsetting to approximately 6 200 tCO2e. Whether considering originating credits: Registering credits for avoided client &/or staff transport is being considered. Such an initiative could be difficult due to potential changes in behaviour.

CC3.3

Did you have emissions reduction initiatives that were active within the reporting year (this can include those in the planning and implementation phases)

Yes

CC3.3a

Please identify the total number of projects at each stage of development, and for those in the implementation stages, the estimated CO2e savings

Stage of development	Number of projects	Total estimated annual CO2e savings in metric tonnes CO2e (only for rows marked *)
Under investigation	4	
To be implemented*	0	
Implementation commenced*	0	
Implemented*	8	4887
Not to be implemented	0	

CC3.3b

For those initiatives implemented in the reporting year, please provide details in the table below

Activity type	Description of activity	Estimated annual CO2e savings (metric tonnes CO2e)	Annual monetary savings (unit currency - as specified in CC0.4)	Investment required (unit currency - as specified in CC0.4)	Payback period	Estimated lifetime of the initiative, years	Comment
Energy efficiency: Building services	Installation of energy efficiency lighting, primarily LED technology, across seven of our largest properties in South Africa. Carbon savings will be made through these installations and should reduce the Scope 2 emissions of the affected buildings.	448	141000	224952	1-3 years	7-10 years	
Energy efficiency: Building services	Upgraded motors to Premium Efficiency Motors at one of our largest properties (a shopping mall) in South Africa.	250	78615	106692	1-3 years		
Energy efficiency: Building services	Installed new High Efficiency chillers in one of our largest properties (a shopping mall) in South Africa.	275	103884	617694	4-10 years		
Behavioral change	Enhancing communication around our Video-conferencing facilities has led to an increase in bookings of the services, and thereby a reduction in travel. Scope of activity - Scope 3 for flights. This year we have streamlined the process for booking video conferencing, reducing the number of short-haul flights made by 50%.	472	168084	154077	<1 year	5 years	
Energy efficiency: Building services	In Zimbabwe, we have upgraded our air conditioning plants to a more efficient model reducing electricity used and refrigerants.	358	112608	351072	1-3 years		
Energy	In Zimbabwe, we have upgraded our existing	84	26496	178848	4-10		

Activity type	Description of activity	Estimated annual CO2e savings (metric tonnes CO2e)	Annual monetary savings (unit currency - as specified in CC0.4)	Investment required (unit currency - as specified in CC0.4)	Payback period	Estimated lifetime of the initiative, years	Comment
efficiency: Building services	lighting to LED alternatives in all common areas thus reducing electricity used.				years		
Energy efficiency: Building services	Nature of activity: Given that the largest percentage of Nedbank's carbon footprint (73%) is from electricity usage, 2013 saw intense efforts to reduce usage wherever possible. Initiatives included the installation of motion sensors, heat pumps, blockout blinds and the upgrading of numerous building management systems. Scope of activity: All electricity purchases relate to Scope 2 emissions. Voluntary vs. mandatory: All reductions are deemed voluntary and aligned to our commitment to the National Energy Efficiency Accord. Development stage: All planned initiatives were executed. Expected lifetime: Equipment installed typically has a technical lifespan of 7 – 10 years. Installations were staggered throughout 2012 and 2013 and will continue in 2014. The monetary savings will then only be realized on a staggered basis. Hence the payback period of more than 3 years. Are these actions being implemented? Yes, some of these activities were implemented in 2013 already and others are still being implemented. Do these actions have carbon savings? Yes, if successful it will reduce Nedbank's footprint by 1% based on the 2012 footprint. These activities will reduce the emissions as disclosed in CC3.1.	2500	195900	58770	4-10 years	Equipment installed has a lifespan of 7 – 10 years. Installations were staggered throughout 2012 and 2013 and onwards. The monetary savings will then only be realized on a staggered basis.	
Behavioral change	Nature of activity: Further optimization of paper consumption by way of reduced use by internal	500	737890	13060	<1 year	The project has a 1 year lifetime. As the behaviour is	

Activity type	Description of activity	Estimated annual CO2e savings (metric tonnes CO2e)	Annual monetary savings (unit currency - as specified in CC0.4)	Investment required (unit currency - as specified in CC0.4)	Payback period	Estimated lifetime of the initiative, years	Comment
	mailing services. This will lead to a reduction in Scope 3 emissions. Scope of activity: Paper use relate to Scope 3 activities. Voluntary vs. mandatory: All reductions are deemed voluntary. Development stage: All planned initiatives were executed. Expected lifetime: The project has a 1 year lifetime. As the behaviour is changed it is expected that future paper reductions will be perpetual. The investigations and implementation were staggered throughout 2013 and onwards. The monetary savings will then only be realized on a staggered basis. Are these actions being implemented? Yes, some of these activities were implemented in 2013 already and others are still being implemented. Do these actions have carbon savings? Yes, if successful it will reduce Nedbank's footprint due to a reduction in the use of paper. These activities will reduce the emissions as disclosed in CC3.1.					changed it is expected that future paper reductions will be perpetual.	

CC3.3c

What methods do you use to drive investment in emissions reduction activities?

Method	Comment
Compliance with regulatory requirements/standards	Group governance and risk management procedures ensure that appropriate investments are made to comply with all regulator requirements, including climate change related ones
Employee engagement	Engaging our employees in environmental efforts is an important part of delivering change across the Group. We promote a culture of efficiency and are continually looking for opportunities to reduce resource use. Much of this work has been conducted at individual business level. However, we also worked to share best practice across the Group through meetings, workshops, our Responsible Business online Forum, the Responsible Business Newsletter and other group e-magazines e.g. in 2013 Mutual & Federal ran another competition to encourage employees to submit their business changing ideas, many of the ideas submitted included carbon saving or other environmental initiatives. The winner had their idea implemented
Internal incentives/recognition programs	Monetary incentives are linked to climate change related objectives for employees within the Responsible Business function, with targets set across a range of areas including climate change awareness of employees, environmental management plans and GHG target reductions. Buildings and facilities managers have energy management and reduction targets within their individual performance targets. In 2013 we set business and building level carbon reduction targets in each of our businesses.
Dedicated budget for other emissions reduction activities	At Old Mutual Group, reducing our impact on the environment is a strategic imperative. As such dedicated budgets are available to realise this imperative. In addition, at Nedbank self-imposed carbon neutrality results in an increased pressure to reduce electricity consumption for which dedicated budgets are also held aside
Other	Having externally communicated climate change targets and, for the first time, reporting performance in our 2013 Annual Report means throughout our business we are under pressure to meet these targets. This in turn is driving internal investment in emissions reduction activities

CC3.3d

If you do not have any emissions reduction initiatives, please explain why not

Further Information

Please see attachment that details the additional information we request from potential new suppliers as noted in question 3.2a

Attachments

https://www.cdp.net/sites/2014/07/13807/Investor CDP 2014/Shared Documents/Attachments/InvestorCDP2014/CC3.TargetsandInitiatives/3.2a additional information questionnaire for suppliers.docx

Page: CC4. Communication

CC4.1

Have you published information about your organization's response to climate change and GHG emissions performance for this reporting year in places other than in your CDP response? If so, please attach the publication(s)

Publication	Page/Section reference	Attach the document
In mainstream financial reports (complete)	KPIs p30-31, Responsible Business p28-29	https://www.cdp.net/sites/2014/07/13807/Investor CDP 2014/Shared Documents/Attachments/CC4.1/Old Mutual 2013 Annual Report and Accounts.pdf
In voluntary communications (complete)	Group highlights p3, KPIs p10-11, Group in Numbers p16, Environmental Management p23, Renewable energy delivery p25, Responsible environmental management p27, Responsible Environmental Management p29, Responsible Environmental Management p33, Responsible Environmental Management p35	https://www.cdp.net/sites/2014/07/13807/Investor CDP 2014/Shared Documents/Attachments/CC4.1/Old Mutual 2013 Responsible Business Report.pdf
In mainstream financial reports (complete)	Supplementary Information page 53 - 59	https://www.cdp.net/sites/2014/07/13807/Investor CDP 2014/Shared Documents/Attachments/CC4.1/Nedbank Integrated Report 2013.pdf
In voluntary communications (complete)	Online - screen shot attached http://www.oldmutual.com/rb/environmental.jsp	https://www.cdp.net/sites/2014/07/13807/Investor CDP 2014/Shared Documents/Attachments/CC4.1/OM Website - Environmental Management Page.jpg
In voluntary communications (complete)	Online - screen shot attached http://www.oldmutual.com/rb/in-practice.jsp?currentKeyArea=12678	https://www.cdp.net/sites/2014/07/13807/Investor CDP 2014/Shared Documents/Attachments/CC4.1/OM Website - Environmental Management Case Studies.jpg
In mainstream financial reports (complete)	p3, p8, p19, p22, p23, p44, p45, p47, p50, p59, p82, p85, p89, p97, p98.	https://www.cdp.net/sites/2014/07/13807/Investor CDP 2014/Shared Documents/Attachments/CC4.1/NedbankIR2013.pdf

Further Information

The Annual Report shows the figures for carbon emissions compared to base year (p29) and previous year (p30-31)

Module: Risks and Opportunities

Page: CC5. Climate Change Risks

CC5.1

Have you identified any climate change risks that have the potential to generate a substantive change in your business operations, revenue or expenditure? Tick all that apply

Risks driven by changes in regulation
Risks driven by changes in physical climate parameters
Risks driven by changes in other climate-related developments

CC5.1a

Please describe your risks driven by changes in regulation

Risk driver	Description	Potential impact	Timeframe	Direct/ Indirect	Likelihood	Magnitude of impact	Estimated financial implications	Management method	Cost of management
International agreements	A number of countries where we have operations – including in the	Other: Increased indirect operational cost	Unknown	Direct	Unknown	Unknown	We have £293.8bn funds under management globally (as at 31/12/13) that could potentially be	We maintain a close watching brief on the progress towards a new	Management of this risk falls under the existing operational

Risk driver	Description	Potential impact	Timeframe	Direct/ Indirect	Likelihood	Magnitude of impact	Estimated financial implications	Management method	Cost of management
	EU, South Africa, United States, India and China – are involved in on-going negotiations to determine international agreements and action on climate change to replace the Kyoto Protocol that finished at the end of 2012. The Doha Amendment in 2013 confirms a view to reducing overall emissions of greenhouse gases by at least 18% below 1990 levels in the commitment period 2013 to 2020. With regards to the treaty, negotiations are still underway, and with the exception of the establishment of the Green Climate Fund the exact nature of the legislation cannot be predicted.						influenced by changes in climate change regulation.	international agreement and the potential impact that this would have on national legislation.	remit and associated budget of Compliance, Legal and Public Affairs teams at Group level, supported by corresponding structures at Business unit level.

Risk driver	Description	Potential impact	Timeframe	Direct/ Indirect	Likelihood	Magnitude of impact	Estimated financial implications	Management method	Cost of management
	What remains consistent is reduction goals for individual nation states that are already supporting a path of consistent GHG emission reductions as part of the legacy of the Kyoto agreement. For example in January 2014 the EU executive proposed a 40% cut in GHG pollutions and an aspirational 27% market share for renewable energies to be achieved by the end of the next decade as a successor to the three 20-20-20 targets. The uncertainty of the exact nature of the new International agreements affects our ability to effectively								

Risk driver	Description	Potential impact	Timeframe	Direct/ Indirect	Likelihood	Magnitude of impact	Estimated financial implications	Management method	Cost of management
	assess long term investment decisions, which we define here as an indirect operational cost (as opposed to a direct operational cost which would include our office operations).								
Cap and trade schemes	In 2013 the third phase of the EU Emissions Trading Scheme (ETS), which aims to help reduce major industrial emitters of GHG and other carbon emissions, the EU Parliament announced that the auction of 900 million allowances will be postponed until 2019-20 to allow demand to pick up. The establishment of a market stability reserve system to change the structure of the scheme has also	Other: Indirect impact on investment decisions	>6 years	Indirect (Client)	More likely than not	Low-medium	Old Mutual has £78.5 bn FUM in the UK and Europe, much of which could potentially be affected in some way by changes to EU cap and trade schemes	Our asset diversification policy and in-house Risk Exposure Aggregation System ensures that we do not have a concentration of investment in a particular sector or investment type. We also include environmental factors in our investment decisions as part of our ESG assessment of companies which goes towards helping	The development of remedial action plans to mitigate this risk is a core part of the Group's risk management strategy and as such, the financial costs for climate change specific activities do not represent a material additional cost and are not measured separately to Old Mutual's wider risk management costs.

Risk driver	Description	Potential impact	Timeframe	Direct/ Indirect	Likelihood	Magnitude of impact	Estimated financial implications	Management method	Cost of management
	been proposed. Whilst this does not affect our direct operational activities in the EU, our investment teams are aware of the possible business implications of the legislation to the companies we invest in and the knock on effect this may have on our investment decisions and the return we are able to offer to our clients.							to reduce and manage the exposure we have to carbon intensive investments. In 2013 we rolled out a Group Responsible Investment Standard and set additional KPIs to track the percentage of our investment capabilities that are applying our Responsible Investment Standard which is helping us to track and manage our different investments.	
Cap and trade schemes	The California Cap and Trade Scheme aims to reduce the state's carbon pollution back to 1990 emissions levels by 2020 and has had a successful first year with 5	Increased operational cost	3 to 6 years	Indirect (Client)	Virtually certain	Low	Old Mutual Asset Management has £155.3 bn FUM in the US that could be affected by carbon taxes or cap and trade schemes. Our Boston head office emits 300 tons of carbon per year of	Our asset diversification policy and in-house Risk Exposure Aggregation System ensures that we do not have a concentration of	The development of remedial action plans to mitigate this risk is a core part of the Group's risk management strategy and as such, the

Risk driver	Description	Potential impact	Timeframe	Direct/ Indirect	Likelihood	Magnitude of impact	Estimated financial implications	Management method	Cost of management
	successful allowance auctions and complete sale of all 2013 vintage allowances. Participants believe the market will be actively trading until at least 2016. There has been indication that a cap and trade scheme or a similar carbon reducing initiative such as a carbon tax may be rolled out into other US states and markets. As Californian legislation is indicative of how other states will follow, this could affect our investment portfolio in the United States valued at £155.3bn. This could have a knock on effect to our clients. In						which the cost to the business would be $1,500 if priced at $5 per metric ton	investment in a particular sector or investment type. We also include environmental factors in our investment decisions as part of our ESG assessment of companies which helps to reduce and manage the exposure we have to carbon intensive investments. In 2013 we rolled out our Group Responsible Investment Standard and set additional KPIs to track the percentage of our investment capabilities applying our Responsible Investment Standard which is helping us to track and manage our	financial costs for climate change specific activities do not represent a material additional cost and are not measured separately to Old Mutual's wider risk management costs.

Risk driver	Description	Potential impact	Timeframe	Direct/ Indirect	Likelihood	Magnitude of impact	Estimated financial implications	Management method	Cost of management
	2013 President Obama announced a commitment to tackling climate change which includes a drive to cutting carbon pollution in America. In 2014 lawmakers in Massachusetts undertook a campaign seeking to pass legislation that would tax carbon at $5 dollars per metric ton in the state. This would result in increased operational costs for our business in the USA with specific regard to our Head Office which is in Boston, Massachusetts.							different investments. In our US operations our USAM Carbon Taskforce meets every three weeks to research, explore and implement ways to reduce our carbon footprint. The Taskforce monitors changes in the footprint and creates and raises awareness amongst employees and throughout our offices. As a result of the work of The Taskforce our carbon footprint was reduced by 12% in 2013 from our base year.	
Carbon taxes	Carbon taxes affect all our businesses with	Increased operational cost	1 to 3 years	Direct	Virtually certain	Medium	Carbon taxes will affect our direct operations and	Across our businesses, we are committed	Old Mutual Wealth has an annual budget

Risk driver	Description	Potential impact	Timeframe	Direct/ Indirect	Likelihood	Magnitude of impact	Estimated financial implications	Management method	Cost of management
	varying degrees of uncertainty. In the UK 2011 Budget, plans were introduced to replace the UK Climate Change Levy with a guaranteed minimum price for carbon produced under the EU ETS of £16 a tonne this year. In 2014 the UK government stated that this price will be frozen at a maximum of £18 from 2015 for 5 years. This is a tax on energy (heat, lighting and power) delivered to industrial and commercial users with the aim of improving energy efficiency. These carbon taxes will affect our direct operations and our investments across the UK including our						investments in the UK. OM Wealth UK has £27.3 bn of assets under management that could be affected by UK Carbon taxes	managing the risk posed by carbon taxes by undertaking work to 'green' our buildings and promote efficiency awareness. In 2014 we set property specific targets for carbon reduction across all our UK properties. In the UK, Old Mutual Wealth conducted an external feasibility study on our biggest UK employee occupied building to find ways we could reduce our emissions with a view to going 'off grid' entirely. Additionally, we are streamlining our business and selling off property which further reduces our emissions	of £30,000 to spend on encouraging and funding energy efficient activities.

Risk driver	Description	Potential impact	Timeframe	Direct/ Indirect	Likelihood	Magnitude of impact	Estimated financial implications	Management method	Cost of management
	investment properties.							and exposure to carbon taxes across the group, in 2013 we sold all but one of our investment properties in the UK reducing our exposure to costs associated with carbon taxes.	
Carbon taxes	The South African Government has delayed the implementation of the planned carbon tax to 2016 to allow for further consultation. In its Budget Review, the SA Treasury said a policy paper will be published soon that proposes to enable companies to reduce their carbon tax liability by 5% to 10% of emissions by using offsets. In May 2013 the	Increased operational cost	1 to 3 years	Direct	Likely	Medium-high	Electricity is by far the biggest energy source for our South African operations with around 80% of our total emissions originating in South Africa. Using industry approved methodology we estimate that a 100% increase in electricity cost would result in just under 10% increase in our operational cost over five years.	In 2013 we continued our contribution in consultation with the South African Government on carbon tax legislation. Our property business continues to monitor and manage the impact the carbon tax will have on the business and our tenants. At a direct operations level we continue to	Costs associated with the carbon tax do not exceed our current costs for monitoring legislation and operating as a business. Old Mutual Property invested £1.1m into carbon reduction initiatives in 2013

Risk driver	Description	Potential impact	Timeframe	Direct/ Indirect	Likelihood	Magnitude of impact	Estimated financial implications	Management method	Cost of management
	proposed rate was still R120 per ton of CO2e increasing at 10% per annum. The news follows intense lobbying by SA's main business lobby SACCI. The South African Carbon Tax will affect our South African operations in three ways. Firstly through our direct operations, and extensive branch network, secondly through our investment property portfolio and thirdly through the effect the tax will have on our holdings and general investments within South Africa. On a broader level the tax will affect our customers who will also receive an increase in electricity costs as a result of the tax							record our carbon emissions on a site level basis allowing us to set site specific reduction targets as we aim to 'green' our buildings. Our Carbon Taskforces across the Group help communicate carbon reduction, managing and encouraging behaviour change around efficiency awareness across our branch network, offices and business which is helping to manage this risk. For our customers, we are working to develop more products and services that will help them	

Risk driver	Description	Potential impact	Timeframe	Direct/ Indirect	Likelihood	Magnitude of impact	Estimated financial implications	Management method	Cost of management
	passed on to consumers by Eskom.							manage and adapt to the increased costs that will be passed on by Eskom due to the tax.	
Emission reporting obligations	Based in the UK, Old Mutual plc and Wealth UK are affected by UK Government CRC Energy Efficiency Scheme and are required to purchase allowances to cover their emissions resulting from their electricity and fossil fuel consumption. In 2013 the UK government simplified reporting and introduced an increase to the time made available for participants to comply. The most significant change	Increased capital cost	Up to 1 year	Direct	Virtually certain	High	There is a direct financial cost in fines for non-compliance, which escalates for each day that the business remains non-compliant, in addition to which is the potential reputational damage to the Old Mutual brand. The brand is externally estimated to be worth around $3bn (brandfinance.com) Compliance has approximately £200-300,000 financial cost implications associated with it	We outsource this to an external expert agency to maintain our evidence log in a compliant manner. The CRC working group has quarterly meetings to review progress.	The cost of CRC compliance for Old Mutual in the UK is somewhere in the region of £150k-£200k per year.

Risk driver	Description	Potential impact	Timeframe	Direct/ Indirect	Likelihood	Magnitude of impact	Estimated financial implications	Management method	Cost of management
	was a reduction in coverage of the Scheme from 29 fuels to only 2; electricity and gas used for heating directly affects our business. This risk poses an increased compliance cost for our UK operations and increased reputational risk through non-compliance								
Emission reporting obligations	The new requirements of the Companies Act in the UK state that all quoted companies have to measure and report greenhouse gas (GHG) emissions. Quoted companies are those that are UK incorporated and whose equity share capital is officially listed on the main market	Increased operational cost	Up to 1 year	Direct	Virtually certain	Medium	Reputational risk associated with reporting incorrect, incomplete or inaccurate data could lead to financial losses as a result of damage to the Old Mutual brand which is estimated to be worth $3bn (brandfinance.com)	In anticipation of this risk, we have undertaken an external readiness review to ensure our data is complete. We aim to ensure compliance in our reporting through completion of GRI data tables which helps us link to and track data we are disclosing	Cost of external readiness review of data annually is around £70,000, Cost of year round data management is around £50,000 per year

Risk driver	Description	Potential impact	Timeframe	Direct/ Indirect	Likelihood	Magnitude of impact	Estimated financial implications	Management method	Cost of management
	of the London Stock Exchange; or is officially listed in a European Economic Area; or is admitted to dealing on either the New York Stock Exchange or NASDAQ. This poses a reputational risk to our business through non-compliance. There is a likelihood of this new UK regulation being replicated in other jurisdictions, further expanding our exposure to this risk as a global business. For example, in recent weeks, the legislation has been echoed within the European Union with ESG data disclosure in financial reports being made mandatory.							externally. In 2013 environmental and carbon data was internally audited and a readiness review was conducted by external auditors KPMG helping us to prepare for a further more detailed audit and external assurance in 2014. A review of the sign-off process for carbon data was conducted alongside a review of data entry and sign off training. In 2013 we introduced an additional level of governance to our data collection sign off process, each business is now required to have all of their environmental	

Risk driver	Description	Potential impact	Timeframe	Direct/ Indirect	Likelihood	Magnitude of impact	Estimated financial implications	Management method	Cost of management
	Spread of such legislation to other jurisdictions would affect our joint listings in other markets e.g. Nedbank which is listed on the JSE. In South Africa, this legislation is already underway as the Department of Environmental Affairs (DEA) expects to implement a mandatory greenhouse gas (GHG) reporting system in 2014. According to the National Climate Change Response White Paper companies and entities that emit more than 100,000 tonnes of GHGs annually or that consume electricity that results in more than 100,000 tonnes of emissions from							data signed off by their Financial Directors, adding weight to the way data is treated internally.	

Risk driver	Description	Potential impact	Timeframe	Direct/ Indirect	Likelihood	Magnitude of impact	Estimated financial implications	Management method	Cost of management
	the electricity sector will be required to report on their GHG emissions in the new system. This will affect all of our businesses directly as incorrect, incomplete or inaccurate environmental reporting data poses a reputational risk.								
Fuel/energy taxes and regulations	The National Energy Regulator of South Africa (NERSA) granted state-owned utility provider, Eskom, a yearly 8% electricity price increase for 2013-2018. The average selling price of electricity in South Africa will rise to 65.51c/kWh on 1 April for Eskom customers and 1 July for municipal customers.	Increased operational cost	Up to 1 year	Direct	Virtually certain	Medium	Our operations cost would increase by a minimum of 8%. Our customers may reduce the amount of money they hold in our products if their living costs increase, affecting their savings and expenses.	We manage the increased operational cost risk through setting and monitoring carbon reduction targets at Group and business level which helps us to manage and reduce our electricity consumption. In addition head of our property portfolio in South Africa, Chris	There is no additional cost of management as it is already included in the cost of our business operations. Old Mutual Property spent R16.9m on carbon reduction initiatives in 2013.

Risk driver	Description	Potential impact	Timeframe	Direct/ Indirect	Likelihood	Magnitude of impact	Estimated financial implications	Management method	Cost of management
	Electricity is by far the biggest energy source for our South African operations – including Nedbank, Old Mutual South Africa and Mutual & Federal. The electricity price increases will have a significant impact on our expected operational costs with a minimum rise of 8% per year. There will be an additional impact on our customers who will also experience a rise in energy costs affecting their household bills, budgeting and expendable income							Davy, is responsible for overseeing the increased efficiency of our property portfolio across South Africa. Our Carbon Taskforces within the businesses also help mitigate the impact of the risk of increased price of electricity. Helping our customers budget and manage their money is part of our business as usual practices as we operate as a Responsible Business.	
International agreements	There is global traction around additional regulation regarding GHG	Increased capital cost	3 to 6 years	Direct	Virtually certain	Low	The cost of non-compliance would affect the Old Mutual brand which is estimated at $3bn	Across the Group, we are working with facilities and maintenance	Costs for maintaining units across the Group will be integrated into

Risk driver	Description	Potential impact	Timeframe	Direct/ Indirect	Likelihood	Magnitude of impact	Estimated financial implications	Management method	Cost of management
	emissions, specifically emissions from HFCs. In June 2013 President Obama and President Xi agreed to work together and with other countries to use the Montreal Protocol to phasedown HFCs, an amendment to the protocol which is a critical step forward toward a global agreement. A practical example of this traction is in Europe where the EU aims to reduce F-gas use by almost 80% by 2030. To do this they will be banning F-gases in new commercial refrigeration equipment and air conditioning appliances from 2022. In the UK it						(brandfinance.com)	contactors to identify the most cost effective path towards resolution towards reducing the number of units that rely on these gasses. In the UK feasibility study, people occupied building to track the cost of reducing our environmental footprint of our operations which included our cooling systems.	contracts with the facilities and management contractors creating no additional costs. The cost of replacing units and the cost of an audit in the UK is estimated to be £200-500,000

Risk driver	Description	Potential impact	Timeframe	Direct/ Indirect	Likelihood	Magnitude of impact	Estimated financial implications	Management method	Cost of management
	will be illegal to use any HCFCs to service RAC equipment from next year so recycled or reclaimed HCFCs may no longer be used. This will affect our business operations as it will require an audit of all air conditioning and fire fighting equipment with a view to determine whether to upgrade or replace with significant financial implications. A global agreement would have further cost implications for our global business								

CC5.1b

Please describe your risks that are driven by change in physical climate parameters

Risk driver	Description	Potential impact	Timeframe	Direct/ Indirect	Likelihood	Magnitude of impact	Estimated financial implications	Management method	Cost of management
Other physical climate drivers	Any physical changes to climate or precipitation e.g. hail poses a risk to buildings and locations and thus business operations. Damage to branch infrastructure can impact ability to serve clients, access to branches, service delivery and staff morale. This would affect all of our business. For example, the UK saw an increase in flooding in 2013 making getting to work more difficult for employees and meetings with our customers harder.	Inability to do business	Up to 1 year	Direct	More likely than not	Medium-high	This will mainly impact our OMSA branch network throughout South Africa and our banking arm Nedbank who also have a large branch network. Nedbank makes up 32% of our Group AOP and has 1050 staffed branch outlets across Africa that may be affected. Nedbank employs 28,789 people and has an AOP of £797M (as at 31/12/13) which could be affected should our ability to do business be disrupted. In the UK and Europe our Wealth business has £78.5bn FUM which could be at risk if unable to do	We're members of various groups globally to help us share best practice & knowledge on the impacts of climate change on the financial sector, e.g. Nedbank's participation in the United Nations Environment Program Finance Initiative. We work to improve the processes & tools for managing & improving the energy efficiency of our operations making us more resilient to increasing fuel costs, climatic pressures on our buildings & disruptions in utility supplies caused by severe weather. We work to reduce the water used in our properties through bleed-off & rainwater harvesting, using	The development of remedial action plans is part of Old Mutual's risk management strategy thus financial costs for climate change specific activities don't represent a material additional cost. Upgrading our IT systems to mitigate disruption from extreme weather doesn't carry additional costs beyond our annual IT budget & is part of our business as usual practices. At Nedbank costs for researching, piloting water saving & treatment programs, & talking to experts is estimated at £525,264 a year

Risk driver	Description	Potential impact	Timeframe	Direct/ Indirect	Likelihood	Magnitude of impact	Estimated financial implications	Management method	Cost of management
							business.	treated effluent for irrigation & upgrading toilet facilities & low-flow taps. Back-up generators across our emerging markets counteract disruptions in energy provision caused by climate change events. Appropriate insurance for our properties covers the cost of any weather damage. We encourage our employees to reduce water & energy consumption by encouraging behavior change & increasing employee awareness around the issue. We drive this agenda through Green Committees who promote green thinking amongst staff locally. Group-wide communications like our Responsible Business Newsletter, Responsible	

Risk driver	Description	Potential impact	Timeframe	Direct/ Indirect	Likelihood	Magnitude of impact	Estimated financial implications	Management method	Cost of management
								Business Forum & our public environmental targets help raise employee awareness of climate change. We have emergency business continuity plans across the Group & provide remote access so employees can work at home in adverse weather conditions. We pilot new programs & execute research to help manage this risk	
Other physical climate drivers	Any physical changes to climate or precipitation poses a risk to the investment properties and buildings that we own that could be damaged by flooding, storms and other extreme weather patterns. Should these properties become damaged by extreme weather	Increased capital cost	Up to 1 year	Direct	More likely than not	Low-medium	This will most significantly impact Old Mutual Property, based in South Africa which owns and manages 54 properties with over 1864 tenants	We're members of various groups globally to help us share best practice & knowledge on the impacts of climate change on the financial sector, e.g. Nedbank participates in the United Nations Environment Program Finance Initiative. We work to improve the processes & tools for managing &	The development of remedial action plans to mitigate risks is an integral part of Old Mutual's risk management strategy and as such, the financial costs for climate change specific activities do not represent a material additional cost and are not measured

Risk driver	Description	Potential impact	Timeframe	Direct/ Indirect	Likelihood	Magnitude of impact	Estimated financial implications	Management method	Cost of management
	the cost of repairing or insuring these buildings poses a significant risk to Old Mutual Property (OMP) and may affect or weaken the value of these properties that we hold as money making investments. Protecting these buildings from extreme weather threat (e.g. making buildings weather or climate change resistance) could further increase OMP's operating and maintenance costs. A recent example is a R200m claim levied against Mutual & Federal for a hospital building that was flooded in recent extremely adverse weather.							improving the energy efficiency of our property portfolio operations, helping our tenants be more resilient to increasing fuel costs, climatic pressures on our buildings and disruptions in utility supplies caused by severe weather events. We continually make changes to our buildings to help tenants reduce their carbon emissions and dependency on municipal water supplies and grid electricity. Changes include: refitting existing units and buildings; leasing more environmentally-friendly new builds. We work to reduce the water used in our properties through bleed-off and rainwater harvesting, using treated effluent for irrigation and	independently from the wider risk management costs. The cost of fitting additional solar panels at Mutualpark (our largest South African operations building) is currently under exploration

Risk driver	Description	Potential impact	Timeframe	Direct/ Indirect	Likelihood	Magnitude of impact	Estimated financial implications	Management method	Cost of management
								upgrading toilet facilities with low-flow taps. Back-up generators across our African and emerging market operations counteract any disruptions in energy provision in these regions potentially caused by climate change events. In 2013 we did a feasibility study to fit solar panels to the roof of our largest South African operations building. Parts of the complex are already off grid thanks to solar power & we hope to expand in 2014. We have appropriate property insurance to cover the cost of any climate change related damage to leased properties.	
Induced changes in natural resources	Changes in the availability and distribution of natural resources fluctuates due to	Reduced stock price (market valuation)	Up to 1 year	Indirect (Client)	More likely than not	Medium	This will primarily impact our Asset Management business which represents 7% of	We're members of various groups globally to help us share best practice & knowledge on the	The development of remedial action plans to mitigate risks is an integral part of Old

Risk driver	Description	Potential impact	Timeframe	Direct/ Indirect	Likelihood	Magnitude of impact	Estimated financial implications	Management method	Cost of management
	changes in climatic conditions caused by climate change could seriously affect our investment portfolios across the globe with climate change having the potential to negatively impact the supply chains and therefore the returns of businesses in which we have investments. The changes caused by climate change could also could lead to an increased risk in violent conflict in these areas. This will primarily impact our Asset Management business but may also affect other investment holdings in our emerging markets businesses.						Group AOP and holds £155.3bn FUM. This risk may also affect our Long-Term Savings business in emerging markets, the potential losses are not categorised as significant but funds under management in this section of the business that may be at some risk total £48.1bn (as at 31/12/13)	impacts of climate change on the financial sector e.g. Nedbank participates in the United Nations Environment Program Finance Initiative. In 2013 we developed our existing governance structures to support a more co-ordinated and consistent approach to Group-wide responsible investment. This approach ensures that climate change factors are integrated into our investment decision making practices. We established a Responsible Investment Committee for the Long-Term Savings division in 2011 to help set the investment criteria appropriate for Old Mutual. The Committee expanded in 2013 reflecting our ongoing	Mutual's risk management strategy and as such, the financial costs for climate change specific activities do not represent a material additional cost and are not measured independently from the wider risk management costs. The Group has an annual budget of £20k which is set aside to spend on further embedding responsible investment practices across the Group.

Risk driver	Description	Potential impact	Timeframe	Direct/ Indirect	Likelihood	Magnitude of impact	Estimated financial implications	Management method	Cost of management
								commitment to leveraging Responsible Investment across the Group. In 2013 we rolled out our Responsible Investment Standard across the Group to help integrate these new decision making behaviours into our general investment practices. Our asset diversification policy and in-house Risk Exposure Aggregation System (REAS) ensures that we do not have a concentration of investment in a particular sector or investment type mitigating the risk of local ‘trauma’, including those caused by climate change. We also include environmental factors (e.g. climate change) into our investment decisions as part of our ESG	

Risk driver	Description	Potential impact	Timeframe	Direct/ Indirect	Likelihood	Magnitude of impact	Estimated financial implications	Management method	Cost of management
								assessment of companies.	
Change in precipitation extremes and droughts	Extreme weather could cost our insurance business heavily through increased claims, for example against building and crop insurance policies. Mutual & Federal, our insurance arm see large increases in claims on their crop insurance policies following dramatic changes in weather conditions. Where historically one in eight years weather conditions were poor for agriculture, now one in six years have poor farming weather conditions in South Africa meaning our agriculture customers make an increased	Increased capital cost	Up to 1 year	Direct	Very likely	Medium-high	The business which will incur the most significant cost to an increase in climate change related insurance claims is Mutual & Federal, who provide short-term insurance and operate in Southern Africa with £0.2bn FUM. Agricultural insurance makes up a large percentage of M&F's business which has £746m in gross written premiums (as at 31/12/13).	We're members of various groups globally to help share best practice & knowledge on the impacts of climate change on the finance sector e.g. Nedbank participates in the United Nations Environment Program Finance Initiative. Our Group-level liability risk policy sets out internal controls & processes that we follow in long-term & short-term insurances. To mitigate disaster risks we have a catastrophe stop & loss, & excess of loss reinsurance treaty to cover claims from an incident occurring within a specified period between a range of specified limits. We use actuarial models to	The development of remedial action plans to mitigate risks is an integral part of Old Mutual's risk management strategy and as such, the financial costs for climate change specific activities do not represent a material additional cost and are not measured independently from the wider risk management costs. At Mutual & Federal the cost of reinsuring all of the policies held is integrated into our business as usual practices

Risk driver	Description	Potential impact	Timeframe	Direct/ Indirect	Likelihood	Magnitude of impact	Estimated financial implications	Management method	Cost of management
	number of claims. Shifting disease vectors may also have an impact on mortality and morbidity rates affecting actuarial tables. As a result, the life assurance business remains sensitive to changes in these trend lines. These risks are particularly relevant to Mutual & Federal and Old Mutual South Africa who offer extensive health and life insurance related products and operate in a part of the world that is likely to be most heavily affected by climate change and has an expensive health care system that would have to deal with these challenges. The IPCC's Fifth Assessment Report notes that							calculate premiums & monitor claims patterns using past experience & statistical methods, to limit our exposure to large single claims & catastrophes. In 2013 we had discussions to shift actuarial modelling from a historic events basis to horizon focused actuarial modelling. Moving towards a futures based model for assessing weather risk will remain on Mutual & Federal's (M&F) agenda. At M&F we have 8 weather eventualities on our business level risk log & investigate the derivatives of each of our investments as standard business practice & reinsure all of our insurance policies to help mitigate & spread the associated risks. At M&F we visit every	

Risk driver	Description	Potential impact	Timeframe	Direct/ Indirect	Likelihood	Magnitude of impact	Estimated financial implications	Management method	Cost of management
	such consequences of climate change are already starting to be felt in other parts of the world. Scientists noted that there has been an increase in heat and cold related mortality with Britain named as one of the countries most at risk from some of the more immediate negative effects of climate change such as increased coastal and inland flooding, heat waves and droughts. This would affect our life assurance arm of the business meaning we would have increased frequency of pay-outs with an effect on our actuary tables.							farm on an individual basis to create tailored risk models for each policy which helps us manage the underwriting of our insurance & the amount of risk we take on at an individual level	

CC5.1c

Please describe your risks that are driven by changes in other climate-related developments

Risk driver	Description	Potential impact	Timeframe	Direct/ Indirect	Likelihood	Magnitude of impact	Estimated Financial Implications	Management method	Cost of management
Reputation	Climate change is widely recognised as the greatest environmental challenge facing the world today and we recognise that our business needs to go significantly beyond compliance to meet the increasing expectations from stakeholders that we will deal with these challenges. Our reputation improves our ability to attract customers, employees and investment, to motivate employees and suppliers, and to differentiate	Inability to do business	Up to 1 year	Direct	Unlikely	High	Our reputation is key to doing business and differentiating from competitors. The potential cost of damage to Old Mutual's brand, valued at £3bn (http://brandfinance.com), is difficult to quantify. A 1% decrease would mean a £31m loss for Old Mutual. At Nedbank, remaining a leader on climate change is linked to remaining carbon neutral which costs £3,501,760 p.a. Without this spend Nedbank's reputation as SA's sixth most valuable brand (as of 31/08/13; http://brandfinance.com) would be at risk.	Management of our reputation through our carbon impacts is a central part of what it means for us to be a responsible business & deliver long-term sustainable success. Maintaining our reputation means taking action to mitigate our own climate change impacts & also creating new products to meet customer demand & committing to a broader role in helping tackle the global	The costs of these actions differ from year to year and are part of our business as usual practices. Internal management of Responsible Business has a specified annual budget. In addition to this budget should be added the spend for communicating this to stakeholders both internal and external.

Risk driver	Description	Potential impact	Timeframe	Direct/ Indirect	Likelihood	Magnitude of impact	Estimated Financial Implications	Management method	Cost of management
	us from our competitors. In particular at Nedbank we are considered to be a thought leader in the climate change space e.g. Nedbank was the first carbon neutral bank in South Africa. At its worst, failure to effectively manage climate change represents a potential threat to our licence to operate.							challenges that climate change presents. Climate change is integrated into our business strategy: our Responsible Business Policy has been rolled out across the Group as has a Group Climate Change Strategy with targets to reduce the GHG emissions from our operations. We engage with our stakeholders on climate change & at Nedbank we have a partnership with WWF-SA that spans more than 20 years & have	

Risk driver	Description	Potential impact	Timeframe	Direct/ Indirect	Likelihood	Magnitude of impact	Estimated Financial Implications	Management method	Cost of management
								ongoing relationships with various research institutions like the University of Cambridge & the Sustainability Institute of the University of Stellenbosch. We use external guidelines & frameworks e.g. the FTSE4Good Index, JSE's Socially Responsible Investment Index & the United National Global Compact to help inform our approach to governance & risk. We use our internal Standard for Responsible Investment & continue to embed these	

Risk driver	Description	Potential impact	Timeframe	Direct/ Indirect	Likelihood	Magnitude of impact	Estimated Financial Implications	Management method	Cost of management
								investment practices across our Group. In 2013 we were sponsors for UNPRI in person in South Africa. We offer services & products that enable our customers to avoid GHG emissions such as the Nedbank Green Affinity, Savvy Account & Solar Water Heater Programme & BGreen Savings Bond	
Changing consumer behaviour	Poor or instable economic and social situations caused by severe climate change impacts could reduce the ability of potential customers to	Reduced demand for goods/services	Up to 1 year	Direct	Unlikely	High	These risks are currently not quantified at a climate change specific level but could affect our product offerings throughout our global business which has a total of £293.8bn FUM.	We offer innovative products to suit different clients and different client needs, enabling us to find opportunities even in	There is no additional cost to managing these risks and they do not represent a material cost to the business. Our product

Risk driver	Description	Potential impact	Timeframe	Direct/ Indirect	Likelihood	Magnitude of impact	Estimated Financial Implications	Management method	Cost of management
	take advantage of our products. E.g. In Old Mutual Namibia after a serious drought many farmers, who are invested in savings and investment products with us, lapsed or cancelled their products with us affecting our business returns. In the UK there is an increasing expectation for companies to provide ethical and environmentally friendly products.							challenging market conditions, including those caused by climate change. We closely monitor lapse rates and persistency information, adapting our business approach as necessary. Old Mutual is diversified across territories and product lines minimising the impact of changes in any specific sector or territory. As an investment, banking, insurance and savings business we are focused on helping people plan ahead and provide for unforeseen	development teams across the business integrate climate change products into their general business practices. In 2013, across the Group we spent £16.1m on community investment of which much is focused on financial education.

Risk driver	Description	Potential impact	Timeframe	Direct/ Indirect	Likelihood	Magnitude of impact	Estimated Financial Implications	Management method	Cost of management
								expenses and circumstances. As part of this we provide financial education to our customers and wider society to help them plan for the future, whatever the eventuality, more effectively. At Old Mutual Wealth, our UK business, we offer a low carbon themed fund which incorporates an environmental and ethical screening process to meet growing consumer appetite.	
Induced changes in human and cultural environment	We work hard to attract, engage and develop the best people and climate	Inability to do business	Up to 1 year	Direct	Unlikely	High	These risks are currently not quantified at a climate change specific level	•Employee well-being programmes are implemented in businesses	There is no additional cost to managing these risks that are integrated

Risk driver	Description	Potential impact	Timeframe	Direct/ Indirect	Likelihood	Magnitude of impact	Estimated Financial Implications	Management method	Cost of management
	change could seriously impact on the health and availability of our employees. Potential water scarcity, food shortages and threat of disease could lead to migration and loss of health. Disruption to transport links caused by severe weather could have an onward impact on our people and their ability to get to work							across the Group. They offer counselling and information services to employees to help them manage periods of stress and illness. These services should help our employees cope with the changes they experience as a result of climate change, increases in illnesses that may arise and the trauma potentially experienced due to extreme weather events •Where possible and appropriate we also provide employees with the equipment and	into our business as usual Human Resources practices and expenses.

Risk driver	Description	Potential impact	Timeframe	Direct/ Indirect	Likelihood	Magnitude of impact	Estimated Financial Implications	Management method	Cost of management
								systems necessary to work remotely. This has obvious business benefits but also provides the capacity to continue to operate remotely through secure web access should extreme or severe weather conditions caused by climate change prevent physical access to our offices for employees	

CC5.1d

Please explain why you do not consider your company to be exposed to risks driven by changes in regulation that have the potential to generate a substantive change in your business operations, revenue or expenditure

CC5.1e

Please explain why you do not consider your company to be exposed to risks driven by physical climate parameters that have the potential to generate a substantive change in your business operations, revenue or expenditure

CC5.1f

Please explain why you do not consider your company to be exposed to risks driven by changes in other climate-related developments that have the potential to generate a substantive change in your business operations, revenue or expenditure

Further Information

Page: CC6. Climate Change Opportunities

CC6.1

Have you identified any climate change opportunities that have the potential to generate a substantive change in your business operations, revenue or expenditure? Tick all that apply

Opportunities driven by changes in regulation
Opportunities driven by changes in physical climate parameters
Opportunities driven by changes in other climate-related developments

CC6.1a

Please describe your opportunities that are driven by changes in regulation

Opportunity driver	Description	Potential impact	Timeframe	Direct/Indirect	Likelihood	Magnitude of impact	Estimated financial implications	Management method	Cost of management
Carbon taxes	Carbon taxes are being proposed and developed in several markets in which we operate. With the rise in carbon taxes it is predicted that the demand for renewable energy will increase, as will self-generation and the need for businesses to become less carbon intensive. This presents several opportunities to Old Mutual starting with playing an active role in the proposed carbon tax	Investment opportunities	Up to 1 year	Direct	Very likely	Medium-high	In 2013 Old Mutual Emerging markets had £48.1bn FUM (as at 31/12/13) of which a proportion could be invested in renewable energy projects. In 2011 Eskom (the SA national electricity supplier) was responsible for 230 MtCO2e, if a carbon tax at the expected rate of R120 per ton was levied then the tax on their emissions could equal	Our product development teams are aware of the opportunity the carbon tax presents to create and provide new carbon efficient products for our customers & integrate the development of these into their general product development practices. Our Responsible Business Governance Structure within South Africa headed up by the OMEM Head of Responsible Business ensures that carbon related business opportunities	Old Mutual Wealth has an annual budget of £30,000 to spend on encouraging and funding energy efficient activities. In 2012 Old Mutual invested £13.6m in the South African Government's Renewable Energy Programmes. The carbon tax in South Africa may open up similar investment opportunities for Old Mutual in the future. Standalone studies of the

Opportunity driver	Description	Potential impact	Timeframe	Direct/Indirect	Likelihood	Magnitude of impact	Estimated financial implications	Management method	Cost of management
	development. There is the opportunity for us to increase our investments in the renewable energy sector, in companies that are responsibly managing their carbon risks and low carbon business with the view that we will see an increase in these investment returns. In South Africa for example, one of our largest markets, carbon tax means clients and investors will start to look to see how businesses are responding to making South Africa a low carbon						R36bn. If Old Mutual saw only 5% of this tax flow through its financial service offerings and made a 1% profit, the total profit for Old Mutual could be around R18m	within South Africa are flagged to the relevant strategy, customer and marketing teams. With the integration of Responsible Business to our core business strategy there is senior leadership appetite for green product development. This is already bearing fruit through the development of the Nedbank Carbon Finance Team. At Group level our Responsible Investment standards which were written in 2012 and disseminated in 2013, are helping to embed ESG decision making practices across	opportunity the SA carbon tax presents have been conducted by Nedbank and carried out on an ad hoc basis. In 2013 these costs were approximately £19,950

Opportunity driver	Description	Potential impact	Timeframe	Direct/Indirect	Likelihood	Magnitude of impact	Estimated financial implications	Management method	Cost of management
	economy. There is an opportunity for us to sell offsets, to invest in green energy products, in infrastructure to help transform South Africa into a green economy and the potential to provide products to a client base with an increased appetite for carbon efficient financial products							the Group. Our Responsible Investment Committee help deliver and push the integration of ESG investments across the Group. The Committee expanded in 2013, reflecting our continued commitment to leveraging Responsible Investment across our business and driving investment in sustainable and renewable energy sectors. More specific actions in 2013 include: giving responsibility to local regions to roll out Responsible Investment activities across the Group; integrating ESG data and ratings	

Opportunity driver	Description	Potential impact	Timeframe	Direct/Indirect	Likelihood	Magnitude of impact	Estimated financial implications	Management method	Cost of management
								into the electronic tools used daily by our listed analyst portfolio managers	
Carbon taxes	The development of carbon taxes has also created the opportunity for the business to reduce operational costs in several markets. The SA Government has delayed the implementation of the planned carbon tax to 2016 to allow for further consultation, buying the business more time. The initial opportunity is lower operational cost and in the long term the	Reduced operational costs	Up to 1 year	Direct	Very likely	High	Electricity is by far the biggest energy source for our South African operations with around 80% of our total emissions originating in South Africa. Using industry approved methodology we estimate that a 100% increase in electricity cost would result in just under 10% increase in our operational cost over five years.	Our Responsible Business data enterers and approvers are placed within each of our businesses to monitor, track and report our carbon data. They are required by their Letter of Representation to provide this data. In 2013 we required that all environment data must be signed off by business level Financial Directors adding extra emphasis on governance which strengthen the importance of the data. By	Our data management system costs the Group approximately £50,000 a year to run and manage. Other costs are absorbed in normal business practices with no additional financial implications.

Opportunity driver	Description	Potential impact	Timeframe	Direct/Indirect	Likelihood	Magnitude of impact	Estimated financial implications	Management method	Cost of management
	business can mitigate the impact on direct operations by expanding its use of green energy sources to other arms of the business. Additional carbon taxes across the group, including the UK CRC, ensure we achieve greater visibility of our energy supply chain and highlight where savings can be made or, potentially, where overbilling has occurred.						By making efficiency gains and reducing electricity consumption by 20% this operational cost could be reduced saving Old Mutual SA nearly £102m.	closely monitoring and tracking our carbon consumption on a quarterly basis we are able to monitor overbilling, recoup any funds due and expose opportunities where savings could be made. Our Carbon Taskforces across the Group are responsible for helping reduce our carbon impact. The Taskforces run employee facing campaigns to encourage stewardship at work with regards to saving electricity, heat, cooling, waste and paper.	
General environmental	Global legislation at	New products/business	Up to 1 year	Direct	Very likely	Medium-high	In 2013, the European	New services will be needed	Costs associated

Opportunity driver	Description	Potential impact	Timeframe	Direct/Indirect	Likelihood	Magnitude of impact	Estimated financial implications	Management method	Cost of management
regulations, including planning	international, national and local levels will require business and Old Mutual's current and potential customers to reduce the carbon intensity and carbon costs of their business. New services will be needed to help people meet the demands of new regulations. The increased demand and need for low-carbon energy to mitigate greenhouse gas emissions provides a business opportunity for our project developers and investors through the creation of new investment	services					Union created a new budget which dedicates 20% of its finances to tackling climate change globally. This amounts to $244 bn funding earmarked for investment in climate change initiatives that would have a global impact. Nedbank has already created a Carbon Team to explore these possibilities and expects to generate project funding in excess of	to help people protect themselves from the risks of climate change as well as for those who are actively seeking to make a positive contribution to the challenge of climate change. Below are examples of the range of products & services designed to attract eco-conscious customers & capture the opportunities available to Old Mutual through climate change: •Old Mutual Investment Group (South Africa) (OMIG (SA)) has a wide range of ESG related funds. In 2013 we managed over £27.1bn bn	with developing new products are integrated into our general business practices with no climate change specific associate costs

Opportunity driver	Description	Potential impact	Timeframe	Direct/Indirect	Likelihood	Magnitude of impact	Estimated financial implications	Management method	Cost of management
	markets. Cap and Trade schemes will create the need for offsetting and advisory services that could be provided by our businesses. Nedbank has already created a Carbon Team to explore these possibilities and expects to generate project funding in excess of US$100 million over the next two to five years. New products and services are already being developed in our banking retail arm as we prepare to offer advanced products and services to our						$100 million over the next two to five years	funds under management (31/12/13) - including OMIG (SA)'s Futuregrowth Fund and the African Infrastructure Investment Managers Fund •At Nedbank we offer an Affinity card which offers customers the opportunity to donate to climate change related projects at no additional cost to the customer. Please see the Nedbank CDP submission for more details •Mutual & Federal offers various business specific schemes such as crop insurance products for farmers, we also	

Opportunity driver	Description	Potential impact	Timeframe	Direct/Indirect	Likelihood	Magnitude of impact	Estimated financial implications	Management method	Cost of management
	client base							make use of brokers who belong to the Agri Guild to give advice on risk management •As a long-term investment business we are focused on helping people plan ahead & provide for unforeseen expenses and circumstances, including those that arise due to the physical impacts of climate change	
Fuel/energy taxes and regulations	Efficiency gains are available through reducing energy consumption in light of potential increases in regulation surrounding energy consumption	Reduced operational costs	1 to 3 years	Direct	Virtually certain	Low-medium	Our South African Property portfolio is worth over £1bn. The value of which has the potential to increase should efficiency gains be initiated in	As energy taxes increase the energy costs of running our property portfolios and offices they also provide financial incentive to reduce our energy consumption, become more energy efficient	Separate budgets are set aside to help Old Mutual reduce our carbon emissions across our business. In 2013 over £1.1m was spent by Old Mutual

Opportunity driver	Description	Potential impact	Timeframe	Direct/Indirect	Likelihood	Magnitude of impact	Estimated financial implications	Management method	Cost of management
	and emissions. For example, increased building regulations will lead to more efficient building stock that will directly reduce our operational costs and potentially increase the value of energy efficient building investment portfolios. In South Africa, the Department of Environmental Affairs is, under the request of Eskom, considering delaying the implementation of an air quality standards regulation for five years after it was calculated that the potential						South Africa.	and make potential financial savings alongside energy savings. We have been working to improve the processes and tools in place for managing and improving the energy efficiency of our operations, enabling us to capitalise on this opportunity: •We have a Group Climate Change Strategy which aims to improve the completeness and accuracy of our emissions data, sets a Group target for carbon reductions, and creates initiatives to engage all our stakeholders •We have made changes to the	Property alone to make energy efficiency gains with additional budget spent on energy efficiency technology to help reduce energy consumption in 2013 at Old Mutual South Africa's biggest office Mutualpark

Opportunity driver	Description	Potential impact	Timeframe	Direct/Indirect	Likelihood	Magnitude of impact	Estimated financial implications	Management method	Cost of management
	gains from compliance did not justify the costs, monetary or otherwise – Eskom calculated about R200bn in capital costs before financing charges and about R6bn a year in operational expenditure. There is an opportunity for Old Mutual to benefit from new legislation which will reduce our carbon emissions in the market which makes up 80% of our total footprint.							buildings we own or lease to reduce our carbon emissions. These changes include refitting existing units and building or leasing more environmentally-friendly new ones •At a business level, Old Mutual Property has a green building strategy which provides us with a structured approach to improving the environmental sustainability of the buildings in our existing portfolio and the ones we are constructing	

CC6.1b

Please describe the opportunities that are driven by changes in physical climate parameters

Opportunity driver	Description	Potential impact	Timeframe	Direct/ Indirect	Likelihood	Magnitude of impact	Estimated financial implications	Management method	Cost of management
Change in mean (average) precipitation	The increase in extreme weather conditions caused by climate change is likely to lead to increases in the scale and frequency of significant financial costs incurred by customers as a result of damage to infrastructure, disruption of utility services (for example access to water), damage to property and crops, disruption of supply chains and distribution of natural resources. Insurance products can offer a method of spreading the risks associated with these impacts and as the	New products/business services	Up to 1 year	Direct	Very likely	Medium	The development of new products and services is built into our business as usual practices, there are no direct financial implications associated with the development of this opportunity. In 2013 our Group adjusted operating profit was £1612m which could increase should new products and new business services be developed	As a long-term savings, protection and investment business we are focused on helping people plan ahead and provide for unforeseen expenses and circumstances, including those that arise due to the physical impacts of climate change, as demonstrated by the list of customer offerings listed below: •Investments and savings products that can help grow our customers' money or draw an income – depending on their needs. •Risk cover provides financial security for customers in the event of disease, disablement, death or retrenchment •Medical cover ensuring that our customers have access to the best medical care	The costs associated with these actions are not currently measured at a climate change specific level and do not represent a material additional cost to the business. At Nedbank the development of business opportunities associated with changes in mean precipitation were also absorbed as part of the existing business structures with the cost of this opportunity already being absorbed. At Mutual & Federal consultation with members of the Agri

Opportunity driver	Description	Potential impact	Timeframe	Direct/ Indirect	Likelihood	Magnitude of impact	Estimated financial implications	Management method	Cost of management
	impacts of climate change grow, so too is the likely demand for insurance products. The businesses able to maximise these opportunities are Old Mutual Specialised Finance, Old Mutual Life Assurance company of South Africa Limited, Nedgroup Life Assurance Company Limited and Old Mutual Financial Life Insurance company (OMFLIC) which provide long-term insurance and Nedgroup Insurance Company Limited and Mutual & Federal, which							available •Life cover protects customers and their families from financial loss as a result of death and disability •Funeral cover to remove the burden of administration and expense in the event of a death in the family •Crop, agri and short-term insurance protecting customers against adverse weather or accident threats •Our management and development of these opportunities is integrated into our group and individual business normal operations. This includes the strategy, risk, customer and product development teams business as usual practices. Through Mutual & Federal, which offers various business specific schemes such as	Guild does not represent a significant financial cost.

Opportunity driver	Description	Potential impact	Timeframe	Direct/ Indirect	Likelihood	Magnitude of impact	Estimated financial implications	Management method	Cost of management
	provide short-term insurance.							crop insurance products for farmers, we also make use of brokers who belong to the Agri Guild to give advice on risk management allowing us to further exploit this opportunity.	
Change in precipitation extremes and droughts	Changes in weather across South Africa have meant that in 2013 Mutual & Federal developed new product offerings for its agricultural clients to help provide cover against more regular extreme weather events e.g. hail not covered by their existing policies	New products/business services	Up to 1 year	Direct	Very likely	Medium	At Mutual & Federal, the cost of development of new products is integrated into business as usual practices. Mutual & Federal's AOP was £43m which could increase with the continued development of new and innovative products.	Core to the commitment to 'be our customers' most trusted partner' is creating the right products for our customers. Our expert Agri product teams specialise in predicting, creating and providing the right products for our agricultural clients. In 2013 discussions were held to start looking at our actuarial models with a future's forward looking view to risk as opposing to looking back historically.	There are no additional costs associated with managing this opportunity
Change in	Increased	New	Up to 1	Direct	Very likely	Medium	Adapting to	All opportunities are	The

Opportunity driver	Description	Potential impact	Timeframe	Direct/ Indirect	Likelihood	Magnitude of impact	Estimated financial implications	Management method	Cost of management
mean (average) temperature	precipitation could be advantageous to certain sectors of the agricultural industry that we are invested in. For example, certain vineyard cultivars could become more feasible if there is an increase in precipitation. Nedbank could possibly be an early mover in the agricultural business sector, specifically in the wine industry and could fund new emerging cultivars in the Western Cape Province.	products/business services	year				changing mean precipitation patterns could lead to new financing opportunities. For example a higher mean rainfall could be advantageous to our banking business Nedbank that provides finance and investment to certain wine industry sectors. The South African wine industry contributes approximately £914m per annum to the Western Cape Province. The scale of the opportunity for Nedbank could be a 30% market share & a 1% profit on that market share, the potential profit	managed through an integrated sustainability management approach/process within Nedbank. The specific opportunities relating to the development of new products and services based on international agreements are driven/coordinated by the Group Sustainability Committee with oversight by the Group Executive Committee and as supported by the Strategy and Sustainability departments. The responsibility for development of the products and services per se, lies with the relevant business cluster and progress against such is monitored by way of performance scorecard measures and	development of opportunities based on changes in mean precipitation mainly falls within existing business structures so most of the costs are absorbed already. It is estimated that these costs were approximately £32,650 for 2013. These opportunities are being implemented.

Opportunity driver	Description	Potential impact	Timeframe	Direct/ Indirect	Likelihood	Magnitude of impact	Estimated financial implications	Management method	Cost of management
							is £1.5m	assessments of progress against business plans. Changing precipitation patterns will affect the grape growers in the Western Cape and in the rest of South Africa. This will in turn affect the wine industry, as grapes are the primary input. It is possible that different vintages could be grown in the future, resulting in exiting new wine offerings for the domestic and international market. Nedbank's agricultural business arm can then potentially benefit from financing non-conventional endeavours in this space.	

CC6.1c

Please describe the opportunities that are driven by changes in other climate-related developments

Opportunity driver	Description	Potential impact	Timeframe	Direct/ Indirect	Likelihood	Magnitude of impact	Estimated financial implications	Management method	Cost of management
Reputation	Our reputation improves our ability to attract customers, employees and investment, to motivate employees and suppliers, and to differentiate us from our competitors. Climate change is widely recognised as the greatest environmental challenge facing the world today. We recognise the opportunities available to the business in going significantly beyond compliance to meet our stakeholder expectations in dealing with climate change.	Increased stock price (market valuation)	Up to 1 year	Direct	Very likely	Medium-high	The financial impact of reputation damage is difficult to quantify but perhaps most easily understood in terms of risk to the brand equity component of enterprise value. Our brand is estimated at $3bn (brandfinance.com) which could increase if the business communicates and behaves responsibly with regards to climate change.	In 2013 we conducted stakeholder research where our 5 strategic pillars, of which one is environmental management, were affirmed as important to both the business & stakeholders. We revisited our Group strategy & identified 5 priorities for the Group to focus on; one being recognised as a leader in responsible business. Going public with this ambition allows the business to manage the opportunity publically. We have taken the following actions that demonstrate to different stakeholders the ways in which we are tackling	The costs associated with these actions are not measured at a climate change specific level & don't represent a material additional cost to the business as they are integrated into our business as usual practices. Part of this broader strategy includes budget set aside to internally manage this reputational opportunity, initiatives undertaken & external communications of them. A separate budget is set aside for the Responsible Business of £600k a year

Opportunity driver	Description	Potential impact	Timeframe	Direct/ Indirect	Likelihood	Magnitude of impact	Estimated financial implications	Management method	Cost of management
								climate change. We communicate our approach through the Group Responsible Business Report, Annual Report & our website. We promote behavior change amongst our employees at work & home & use our group-wide intranet to engage employees on environmental issues more broadly. Our procurement policies take into consideration carbon impacts of our suppliers & require that suppliers have an environment policy that matches, or exceeds Group policy. We've made a number of commitments & activities	

Opportunity driver	Description	Potential impact	Timeframe	Direct/ Indirect	Likelihood	Magnitude of impact	Estimated financial implications	Management method	Cost of management
								across the Group which demonstrates our commitment to deal with climate change & engage with policy makers. We remained a signatory of The 2°C Challenge Communiqué & of the UN-backed PRI. In 2013 we sponsored the South African PRI in person. Old Mutual Investment Group, South Africa was involved in the drafting of the Code of Responsible Investing in South Africa (CRISA) in 2013 & The Head of Sustainability Research & Engagement was an active member of the Drafting Committee	

CC6.1d

Please explain why you do not consider your company to be exposed to opportunities driven by changes in regulation that have the potential to generate a substantive change in your business operations, revenue or expenditure

CC6.1e

Please explain why you do not consider your company to be exposed to opportunities driven by physical climate parameters that have the potential to generate a substantive change in your business operations, revenue or expenditure

CC6.1f

Please explain why you do not consider your company to be exposed to opportunities driven by changes in other climate-related developments that have the potential to generate a substantive change in your business operations, revenue or expenditure

Further Information

Module: GHG Emissions Accounting, Energy and Fuel Use, and Trading

Page: CC7. Emissions Methodology

CC7.1

Please provide your base year and base year emissions (Scopes 1 and 2)

Base year	Scope 1 Base year emissions (metric tonnes CO2e)	Scope 2 Base year emissions (metric tonnes CO2e)
Fri 01 Jan 2010 - Fri 31 Dec 2010	7560	792833.91

CC7.2

Please give the name of the standard, protocol or methodology you have used to collect activity data and calculate Scope 1 and Scope 2 emissions

Please select the published methodologies that you use
The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (Revised Edition)

CC7.2a

If you have selected "Other" in CC7.2 please provide details of the standard, protocol or methodology you have used to collect activity data and calculate Scope 1 and Scope 2 emissions

CC7.3

Please give the source for the global warming potentials you have used

Gas	Reference
CO_2	Other: 2013 Guidelines to DEFRA / DECC GHG Conversion Factors for Company Reporting
CH_4	Other: 2013 Guidelines to DEFRA / DECC GHG Conversion Factors for Company Reporting
Other: HCFC 22 (R22 refrigerant)	Other: 2013 Guidelines to DEFRA / DECC GHG Conversion Factors for Company Reporting
Other: R-134A	Other: 2013 Guidelines to DEFRA / DECC GHG Conversion Factors for Company Reporting
Other: R-407C	Other: 2013 Guidelines to DEFRA / DECC GHG Conversion Factors for Company Reporting
Other: R-417A	Other: 2013 Guidelines to DEFRA / DECC GHG Conversion Factors for Company Reporting

CC7.4

Please give the emissions factors you have applied and their origin; alternatively, please attach an Excel spreadsheet with this data at the bottom of this page

Fuel/Material/Energy	Emission Factor	Unit	Reference

Further Information

7.1 - The base year emissions data reflects the emissions of all current Old Mutual employee locations and properties where we have operational control, to ensure accurate comparison for reduction targets. In previous years, we have reported based on equity share. 7.4 - spreadsheet attached

Attachments

https://www.cdp.net/sites/2014/07/13807/Investor CDP 2014/Shared Documents/Attachments/InvestorCDP2014/CC7.EmissionsMethodology/2013 DEFRA Emission factors.xls

Page: CC8. Emissions Data - (1 Jan 2013 - 31 Dec 2013)

CC8.1

Please select the boundary you are using for your Scope 1 and 2 greenhouse gas inventory

Operational control

CC8.2

Please provide your gross global Scope 1 emissions figures in metric tonnes CO2e

14716.88

CC8.3

Please provide your gross global Scope 2 emissions figures in metric tonnes CO2e

865181.85

CC8.4

Are there are any sources (e.g. facilities, specific GHGs, activities, geographies, etc.) of Scope 1 and Scope 2 emissions that are within your selected reporting boundary which are not included in your disclosure?

Yes

CC8.4a

Please provide details of the sources of Scope 1 and Scope 2 emissions that are within your selected reporting boundary which are not included in your disclosure

Source	Relevance of Scope 1 emissions from this source	Relevance of Scope 2 emissions excluded from this source	Explain why the source is excluded
South Africa Branches	Emissions are relevant but not yet calculated	Emissions are relevant but not yet calculated	The majority of our South African branches are rented, making data collection challenging. Our aim is to start data collection from these sites, with generation of estimates being considered should accurate data collection not be possible. We have encountered a number of local reporting and data collection barriers, specifically surrounding the collation of energy consumption data. In many instances, this is due to landlords not passing on data to Old Mutual. This is a focus area for us in the coming year given the size of the branch network.
Property Portfolios	Emissions are not relevant	Emissions are not relevant	A small portion of our property portfolio, namely in Malawi, struggle to obtain relevant data due to impractical systems and challenging logistics within the country in which they are based. These portfolios are not material to Old Mutual's total emissions.
Selected Nedbank electronic banking services like ATM, SST and POS	No emissions from this source	Emissions are not relevant	Reliable data for electricity consumption for electronic banking service devices (Automated Teller Machines, (ATM), Self Service Terminals (SST) and Point of Sale (POS) devices) is not currently available. This is not a significant exclusion as the electricity consumption not included is calculated at less than 2% of the total electricity use for Nedbank
Bancassurance and Wealth Financial Advisors	No emissions from this source	Emissions are not relevant	A very small proportion (0.2% of FTE headcount) of our total work force, primarily Financial Advisors, are based in home offices . We do not report the electricity consumption of these workers as the total consumption from home workers is estimated at less than 0.3% of the total electricity use for Nedbank
Pick-n-Pay in store Nedbank outlets	No emissions from this source	Emissions are not relevant	Separate electricity meters are not installed for approximately 100 small Nedbank service outlets at in-store Nedbank kiosks. These outlets consist of two or three staff with computer and printing facilities. A proxy calculation of associated emissions estimate the exclusion at less 0.4% of total electricity use for Nedbank

CC8.5

Please estimate the level of uncertainty of the total gross global Scope 1 and 2 emissions figures that you have supplied and specify the sources of uncertainty in your data gathering, handling and calculations

Scope 1 emissions: Uncertainty range	Scope 1 emissions: Main sources of uncertainty	Scope 1 emissions: Please expand on the uncertainty in your data	Scope 2 emissions: Uncertainty range	Scope 2 emissions: Main sources of uncertainty	Scope 2 emissions: Please expand on the uncertainty in your data
More than 2% but less than or equal to 5%	Data Gaps Data Management	We have improved training across our business units concerning data collection regarding Scope 1. However, we are aware there are some business units who are struggling with reporting emissions from air conditioning units. In many cases, this is where Old Mutual is a tenant within a large building, and data on the breakdown relevant to Old Mutual cannot be provided by the landlord. As a result, we have a small uncertainty in this area.	More than 2% but less than or equal to 5%	Data Gaps Assumptions Data Management	Similar to Scope 1 emissions, there are a small number of employee locations across the business where energy consumption data can be difficult to obtain from landlords where Old Mutual is a tenant. In this instance, estimates were made based on previous year's data and average usage per employee in that geographical region. ADD TO

CC8.6

Please indicate the verification/assurance status that applies to your reported Scope 1 emissions

Third party verification or assurance complete

CC8.6a

Please provide further details of the verification/assurance undertaken for your Scope 1 emissions, and attach the relevant statements

Type of verification or assurance	Attach the statement	Page/section reference	Relevant standard	Proportion of reported Scope 1 emissions verified (%)
Limited assurance	https://www.cdp.net/sites/2014/07/13807/Investor CDP 2014/Shared Documents/Attachments/CC8.6a/NedbankIR2013ASSURANCE.pdf	98,99 of Integrated Annual Report	ISAE3000	5

CC8.6b

Please provide further details of the regulatory regime to which you are complying that specifies the use of Continuous Emissions Monitoring Systems (CEMS)

Regulation	% of emissions covered by the system	Compliance period	Evidence of submission

CC8.7

Please indicate the verification/assurance status that applies to your reported Scope 2 emissions

Third party verification or assurance complete

CC8.7a

Please provide further details of the verification/assurance undertaken for your Scope 2 emissions, and attach the relevant statements

Type of verification or assurance	Attach the statement	Page/Section reference	Relevant standard	Proportion of Scope 2 emissions verified (%)
Limited assurance	https://www.cdp.net/sites/2014/07/13807/Investor CDP 2014/Shared Documents/Attachments/CC8.7a/NedbankIR2013ASSURANCE.pdf	98,99 of Integrated Annual Report	ISAE3000	17

CC8.8

Please identify if any data points other than emissions figures have been verified as part of the third party verification work undertaken

Additional data points verified	Comment
Year on year change in emissions (Scope 1 and 2)	Part of the external assurance is a trend analysis between years

CC8.9

Are carbon dioxide emissions from biologically sequestered carbon relevant to your organization?

No

CC8.9a

Please provide the emissions from biologically sequestered carbon relevant to your organization in metric tonnes CO2

Further Information

8.1 - We are using an operational control approach, and counting 100% of emissions where we have operational control, even where we do not own 100% of the business (such as Nedbank or our US Affiliates)

Page: CC9. Scope 1 Emissions Breakdown - (1 Jan 2013 - 31 Dec 2013)

CC9.1

Do you have Scope 1 emissions sources in more than one country?

Yes

CC9.1a

Please break down your total gross global Scope 1 emissions by country/region

Country/Region	Scope 1 metric tonnes CO_2e
Austria	41.09
Bermuda	0
Botswana	2.22
Colombia	12.25
France	0
Germany	26
Hong Kong	0
Ireland	0
Isle of Man	167.9
Italy	0
Kenya	53.07

Country/Region	Scope 1 metric tonnes CO2e
Luxembourg	0
Malawi	26.05
Mexico	68.54
Namibia	1902.86
Nigeria	0
Poland	280.38
Singapore	0
South Africa	7921.14
United Arab Emirates	0
United Kingdom	1608.66
United States of America	0.81
Zimbabwe	2562.19
Switzerland	0
Swaziland	43.52

CC9.2

Please indicate which other Scope 1 emissions breakdowns you are able to provide (tick all that apply)

By business division
By activity

CC9.2a

Please break down your total gross global Scope 1 emissions by business division

Business division	Scope 1 emissions (metric tonnes CO2e)
Emerging Markets	8724.22
Nedbank	799.18
Property & Casualty	3068.44
Wealth	2124.03
US Asset Management	0.81

CC9.2b

Please break down your total gross global Scope 1 emissions by facility

Facility	Scope 1 emissions (metric tonnes CO2e)	Latitude	Longitude

CC9.2c

Please break down your total gross global Scope 1 emissions by GHG type

GHG type	Scope 1 emissions (metric tonnes CO2e)

CC9.2d

Please break down your total gross global Scope 1 emissions by activity

Activity	Scope 1 emissions (metric tonnes CO2e)
Employee Locations	12498.82
Property Portfolio	2217.86

CC9.2e

Please break down your total gross global Scope 1 emissions by legal structure

Legal structure	Scope 1 emissions (metric tonnes CO2e)

Further Information

Page: CC10. Scope 2 Emissions Breakdown - (1 Jan 2013 - 31 Dec 2013)

CC10.1

Do you have Scope 2 emissions sources in more than one country?

Yes

CC10.1a

Please break down your total gross global Scope 2 emissions and energy consumption by country/region

Country/Region	Scope 2 metric tonnes CO2e	Purchased and consumed electricity, heat, steam or cooling (MWh)	Purchased and consumed low carbon electricity, heat, steam or cooling accounted for CC8.3 (MWh)
Austria	2.91	38.11	
Bermuda	122	233.05	
Botswana	95.78	53.82	
Colombia	97.25	909.36	
France	24	306.43	
Germany	414	897.63	
Hong Kong	164.77	23.2	
Ireland	42.15	5.43	
Isle of Man	597.9	1342.15	
Italy	95	233.21	
Kenya	341.93	536.26	
Luxembourg	3	7.57	
Malawi	69.95	109.29	
Mexico	289.46	636.64	
Namibia	267.14	5254.81	
Nigeria	14	31.43	
Poland	254.62	325.57	
Singapore	53.65	709.6	
South Africa	843679.68	887226.53	
Switzerland	7	274.07	
United Arab Emirates	122.6	15.99	
United Kingdom	8483.06	22502.38	1508.49
United States of America	4319.19	8269.42	
Zimbabwe	5608.81	20269.96	
Swaziland	12.48	43.67	

CC10.2

Please indicate which other Scope 2 emissions breakdowns you are able to provide (tick all that apply)

By business division
By activity

CC10.2a

Please break down your total gross global Scope 2 emissions by business division

Business division	Scope 2 emissions (metric tonnes CO2e)
Emerging Markets	693450.6
Nedbank	151562.82
Property & Casualty	5463.56
Wealth	10137.69
US Asset Management	4319.19

CC10.2b

Please break down your total gross global Scope 2 emissions by facility

Facility	Scope 2 emissions (metric tonnes CO2e)

CC10.2c

Please break down your total gross global Scope 2 emissions by activity

Activity	Scope 2 emissions (metric tonnes CO2e)
Employee Locations	228681.18
Property Portfolio	636500.67

CC10.2d

Please break down your total gross global Scope 2 emissions by legal structure

Legal structure	Scope 2 emissions (metric tonnes CO2e)

Further Information

Page: CC11. Energy

CC11.1

What percentage of your total operational spend in the reporting year was on energy?

More than 0% but less than or equal to 5%

CC11.2

Please state how much fuel, electricity, heat, steam, and cooling in MWh your organization has purchased and consumed during the reporting year

Energy type	MWh
Fuel	35741.39
Electricity	689505.6
Heat	1508.49
Steam	0
Cooling	0

CC11.3

Please complete the table by breaking down the total "Fuel" figure entered above by fuel type

Fuels	MWh
Diesel/Gas oil	2585
Motor gasoline	28565
Natural gas	4591.39

CC11.4

Please provide details of the electricity, heat, steam or cooling amounts that were accounted at a low carbon emission factor in the Scope 2 figure reported in CC8.3

Basis for applying a low carbon emission factor	MWh associated with low carbon electricity, heat, steam or cooling	Comment
Non-grid connected low carbon electricity not owned by company, no	1508.49	At our largest building in the UK, we use the local district heating scheme which uses geothermal energy to generate heat. This is provided through the Southampton Geothermal

Basis for applying a low carbon emission factor	MWh associated with low carbon electricity, heat, steam or cooling	Comment
instruments created		Heating Company, owned by the City Council.

Further Information

11.3 - Generator Fuel (diesel) 243,044 litres = 9,306,154 MJ = 2,585 MWh Motor Fuel (diesel) 982,629 litres = 37,624864 MJ = 10,451 MWh Motor Fuel (Petrol) 2,025,203 litres = 65,211,536 MJ = 18,114 MWh

Page: CC12. Emissions Performance

CC12.1

How do your gross global emissions (Scope 1 and 2 combined) for the reporting year compare to the previous year?

Decreased

CC12.1a

Please identify the reasons for any change in your gross global emissions (Scope 1 and 2 combined) and for each of them specify how your emissions compare to the previous year

Reason	Emissions value (percentage)	Direction of change	Comment
Emissions reduction activities	3.4	Decrease	Our property portfolio across our Emerging Markets business decreased emissions by 3.4% overall from 2012 to 2013. In particular, Old Mutual Property reduced emissions by over 5% - a reduction of almost 30,000 tonnes CO2e. This was through installation of more energy efficient systems (such as LED lighting) and by selling some of the less energy efficient properties in our portfolio
Divestment	0	No change	There has been no divestment this year

Reason	Emissions value (percentage)	Direction of change	Comment
Acquisitions	0	No change	There have been no relevant acquisitions this year
Mergers	0	No change	There have been no mergers this year
Change in output	0	No change	There has been no change in output this year
Change in methodology	0	No change	Please see note in 'Further Information' section
Change in boundary	0	No change	There has been no change in boundary this year.
Change in physical operating conditions	0	No change	There has been no change in physical operating conditions this year
Unidentified	0	No change	
Other	2.3	Increase	Overall emissions from our employee occupied properties has increased, with an increase in employee numbers being attributed to this increase. However, emissions per employee has reduced, highlighting the improvements in efficiency in this properties.

CC12.2

Please describe your gross global combined Scope 1 and 2 emissions for the reporting year in metric tonnes CO2e per unit currency total revenue

Intensity figure	Metric numerator	Metric denominator	% change from previous year	Direction of change from previous year	Reason for change
44.42	metric tonnes CO2e	unit total revenue	0.4	Decrease	Financial services companies generally do not have a straightforward turnover figure that is correlated to emissions. Therefore, we cannot offer an explanation for this change in emissions intensity. This year, for the first time in our report, we stated our tonnes CO2e per £mFUM (Funds Under Management) at 3.0, the financial metric we feel most closely

Intensity figure	Metric numerator	Metric denominator	% change from previous year	Direction of change from previous year	Reason for change
					links to our carbon footprint activities. We consider the emission intensity targets we have set (per employee and per metre squared) are more relevant ways to measure energy efficiency. Note on data: 2012 tCO2e 896,623 2013 tCO2e 879,899, Total Revenue 2012 £20,092m 2013 £19,810m. 2012 Intensity figure (re-stated) 44.63

CC12.3

Please describe your gross global combined Scope 1 and 2 emissions for the reporting year in metric tonnes CO2e per full time equivalent (FTE) employee

Intensity figure	Metric numerator	Metric denominator	% change from previous year	Direction of change from previous year	Reason for change
4.25	metric tonnes CO2e	FTE employee	1.9	Decrease	This small decrease is attributed to improved engagement with business units who have been working on promoting energy efficiency. Note on data - this figure relates only to our employee locations and excludes data from our property portfolios. 2012 235,581 tCO2e, 54,368 employees. 2013 241,180 tCO2e, 56,812 employees

CC12.4

Please provide an additional intensity (normalized) metric that is appropriate to your business operations

Intensity figure	Metric numerator	Metric denominator	% change from previous year	Direction of change from previous year	Reason for change
0.23	metric tonnes CO2e	square meter	9.5	Increase	Although extensive work has been carried out on our property portfolio to ensure we are reducing our carbon emissions, we have also been increasing occupancy during the year. We anticipate that a number of the efficiency changes we are making will have a greater impact next year. We have also ensured that historical data takes into account properties we currently own for best comparison when calculating reductions. Note on data - 2012 661,041 tCO2e, 3,134,919 m2, 2013 638,715 tCO2e, 2,732,349 m2

Further Information

As of 2013, we measure our emissions on an operational control basis. When comparing to previous year's data in this report, we are restating, and have included the restated data in the explanation where appropriate.

Page: CC13. Emissions Trading

CC13.1

Do you participate in any emissions trading schemes?

Yes

CC13.1a

Please complete the following table for each of the emission trading schemes in which you participate

Scheme name	Period for which data is supplied	Allowances allocated	Allowances purchased	Verified emissions in metric tonnes CO2e	Details of ownership
Other: Nedbank Selt Imposed Carbon Neutral Status	Tue 01 Jan 2013 - Tue 31 Dec 2013	0	230000	221378.81	Other: All facilities occupied by Nedbank - owned, managed, leased etc.

CC13.1b

What is your strategy for complying with the schemes in which you participate or anticipate participating?

Nedbank monitors, measures and reports on its carbon footprint annually and it Carbon Neutral status is a self-imposed initiative. It is always the aim to reduce the footprint as far as possible before offsetting the residual footprint. The strategy to comply with it is strongly reliant on the buy in from top management so that future Carbon Neutral initiatives are supported. Currently there is agreement within Nedbank that the Carbon Neutral endeavours will continue.

CC13.2

Has your organization originated any project-based carbon credits or purchased any within the reporting period?

Yes

CC13.2a

Please provide details on the project-based carbon credits originated or purchased by your organization in the reporting period

Credit origination or credit purchase	Project type	Project identification	Verified to which standard	Number of credits (metric tonnes of CO2e)	Number of credits (metric tonnes CO2e): Risk adjusted volume	Credits cancelled	Purpose, e.g. compliance
Credit Purchase	Forests	Project name: The Kasigau Corridor REDD Project- Phase I Project site: Rukinga Sanctuary, Kenya. Description: Nedbank is delighted to continue its association with this project in 2013. In 2011 it became the world's first Reducing Emissions from Deforestation and Forest Degradation (REDD) project to issue carbon credits. The project is successfully preventing the deforestation of Kenya's Kasigau Corridor while delivering significant economic, social and cultural benefits to local communities.	VCS (Voluntary Carbon Standard)	100000	100000	Yes	Voluntary Offsetting

Further Information

Page: CC14. Scope 3 Emissions

CC14.1

Please account for your organization's Scope 3 emissions, disclosing and explaining any exclusions

Sources of Scope 3 emissions	Evaluation status	metric tonnes CO2e	Emissions calculation methodology	Percentage of emissions calculated using primary data	Explanation
Purchased goods and services	Relevant, calculated	3048.	Greenhouse Gas Protocol: A Corporate Account and	100.00%	The emissions for this section are associated with the purchase and use of paper for printing and other office

Sources of Scope 3 emissions	Evaluation status	metric tonnes CO2e	Emissions calculation methodology	Percentage of emissions calculated using primary data	Explanation
			Reporting Standard (Revised Edition)		use for our Nedbank business. Nedbank engages with paper suppliers as to guide the paper purchase process.
Capital goods	Not relevant, explanation provided		Greenhouse Gas Protocol: A Corporate Account and Reporting Standard (Revised Edition)		If applicable, all emissions from these sources were captured in other sections
Fuel-and-energy-related activities (not included in Scope 1 or 2)	Not relevant, explanation provided		Greenhouse Gas Protocol: A Corporate Account and Reporting Standard (Revised Edition)		If applicable, all emissions from these sources were captured in other sections
Upstream transportation and distribution	Not relevant, explanation provided		Greenhouse Gas Protocol: A Corporate Account and Reporting Standard (Revised Edition)		If applicable, all emissions from these sources were captured in other sections
Waste generated in operations	Not relevant, explanation provided		Greenhouse Gas Protocol: A Corporate Account and Reporting Standard (Revised Edition)		All emissions from these soruces were captured in other sections. Solid waste generated does not fall within any greenhouse gas scope.
Business travel	Relevant, calculated	18573.93	Greenhouse Gas Protocol: A Corporate Account and Reporting Standard (Revised Edition)	100.00%	We carefully monitor our business travel, and have continued to improved our Video-Conferencing equipment across the Group to reduce the need for travel. This value covers all flights, hired cars and rail journeys completed for business travel.
Employee commuting	Relevant, calculated	40406.56	Greenhouse Gas Protocol: A Corporate Account and Reporting Standard (Revised Edition)	100.00%	Nedbank sends out an annual staff commuting survey. A response rate of about 65% is achieved from which the total staff commuting travel is calculated
Upstream leased assets	Not relevant, explanation provided		Greenhouse Gas Protocol: A Corporate Account and Reporting Standard (Revised Edition)		If applicable, all emissions from these sources were captured in other sections
Downstream transportation and distribution	Not relevant, explanation provided		Greenhouse Gas Protocol: A Corporate Account and Reporting Standard (Revised Edition)		Given the nature of the business, Old Mutual does not directly transport or distribute goods. Any distribution that does occur is accounted for under Scope 1 emissions. Therefore, there are no emissions arising from

Sources of Scope 3 emissions	Evaluation status	metric tonnes CO2e	Emissions calculation methodology	Percentage of emissions calculated using primary data	Explanation
					'downstream transportation and distribution'
Processing of sold products	Not relevant, explanation provided		Greenhouse Gas Protocol: A Corporate Account and Reporting Standard (Revised Edition)		Given the nature of the business, Old Mutual does not directly sell any products. Therefore, there are no emissions arising from 'processing of sold products'
Use of sold products	Not relevant, explanation provided		Greenhouse Gas Protocol: A Corporate Account and Reporting Standard (Revised Edition)		Given the nature of the business, Old Mutual does not directly sell any products. Therefore, there are no emissions arising from 'use of sold products'
End of life treatment of sold products	Not relevant, explanation provided		Greenhouse Gas Protocol: A Corporate Account and Reporting Standard (Revised Edition)		Given the nature of the business, Old Mutual does not directly sell any products. Therefore, there are no emissions arising from 'end of life treatment of sold products'
Downstream leased assets	Not relevant, explanation provided		Greenhouse Gas Protocol: A Corporate Account and Reporting Standard (Revised Edition)		If applicable, all emissions from these sources were captured in other sections.
Franchises	Not relevant, explanation provided		Greenhouse Gas Protocol: A Corporate Account and Reporting Standard (Revised Edition)		There is no franchising within Old Mutual.
Investments	Relevant, not yet calculated	32494775	Greenhouse Gas Protocol: A Corporate Account and Reporting Standard (Revised Edition)	0%	We continue to work on our methodology for capturing this data with regards to our investment portfolio in advance of industry publication of guidelines. Please see full methodology document attached
Other (upstream)	Not evaluated		Greenhouse Gas Protocol: A Corporate Account and Reporting Standard (Revised Edition)		Not applicable
Other (downstream)	Not evaluated		Greenhouse Gas Protocol: A Corporate Account and Reporting Standard (Revised Edition)		Not applicable

CC14.2

Please indicate the verification/assurance status that applies to your reported Scope 3 emissions

Third party verification or assurance complete

CC14.2a

Please provide further details of the verification/assurance undertaken, and attach the relevant statements

Type of verification or assurance	Attach the statement	Page/Section reference	Relevant standard	Proportion of Scope 3 emissions verified (%)
Limited assurance	https://www.cdp.net/sites/2014/07/13807/Investor CDP 2014/Shared Documents/Attachments/CC14.2a/NedbankIR2013ASSURANCE.pdf	98,99 Nedbank Annual Integrated Report 2013	ISAE3000	

CC14.3

Are you able to compare your Scope 3 emissions for the reporting year with those for the previous year for any sources?

Yes

CC14.3a

Please identify the reasons for any change in your Scope 3 emissions and for each of them specify how your emissions compare to the previous year

Sources of Scope 3 emissions	Reason for change	Emissions value (percentage)	Direction of change	Comment
Business travel	Change in methodology	16.1	Increase	We are now collecting hire car travel data as well as rail and flight information, increasing our absolute Scope 3 emissions from 2012. Our long haul flights have decreased 21.3% since 2012 (2012 - 6077.85 tCO_2e, 2013 - 4778.93 tCO_2e), which we believe is due to an increased usage of our video conferencing systems, introduced in late 2012. We have worked hard to streamline the booking process to make these systems more appealing to users and increase usage.
Purchased goods & services	Emissions reduction activities	13.19	Decrease	The emissions from this section are associated with the purchase and use of paper for printing and other office use for Nedbank. Nedbank engages with paper suppliers as to guide the paper purchase process. Due to these engagements and paper usage reduction initiatives the paper emissions were reduced

CC14.4

Do you engage with any of the elements of your value chain on GHG emissions and climate change strategies? (Tick all that apply)

Yes, our suppliers
Yes, our customers

CC14.4a

Please give details of methods of engagement, your strategy for prioritizing engagements and measures of success

At Group all new suppliers go through the Business Units' due diligence process. This is a detailed and extensive questionnaire that relates to all areas of Responsible Business including climate change and environmental performance (see climate change questionnaire attached).
New suppliers are questioned about how they integrate environmental management systems, how they measure their own impact and suggested ways they can

help improve Old Mutual’s environmental impact and are chosen according to their performance.
Success is measured by a vendor's ability to help the business reduce their number of deliveries that need to be made, their selection of environmental friendly alternative products on offer and their ability to help the business reduce their product consumption

- At Nedbank an annual vendor conference is held where environmental and broader sustainability issues are raised and discussed with vendors.
- Throughout the year the vendors with the highest amount of spend are prioritized for further interactions and meetings.
- Success is measured by obtaining and applying measures to either reduce the use of a product or shift to more environmental sustainable options. As an example, due to engagements with paper suppliers the total greenhouse gas pollution per tonne of paper could be reduced for the paper sourced by Nedbank

CC14.4b

To give a sense of scale of this engagement, please give the number of suppliers with whom you are engaging and the proportion of your total spend that they represent

Number of suppliers	% of total spend	Comment
300	90%	This is mainly done through Nedbank's annual vendor conference

CC14.4c

If you have data on your suppliers’ GHG emissions and climate change strategies, please explain how you make use of that data

How you make use of the data	Please give details
Use in supplier scorecards	Part of vendor selection and final product selection from vendors entails disclosures by suppliers. One of the disclosures will be the GHG emissions and climate change strategies of vendors. The quality of the strategies impact the final vendor/supplier and product selection

CC14.4d

Please explain why you do not engage with any elements of your value chain on GHG emissions and climate change strategies, and any plans you have to develop an engagement strategy in the future

Further Information

Attachments

https://www.cdp.net/sites/2014/07/13807/Investor CDP 2014/Shared Documents/Attachments/InvestorCDP2014/CC14.Scope3Emissions/EmissionsInvestmentMethodology.pdf

Module: Sign Off

Page: CC15. Sign Off

CC15.1

Please provide the following information for the person that has signed off (approved) your CDP climate change response

Name	Job title	Corresponding job category
Helen Wilson	Head of Responsible Business	Environment/Sustainability manager

Further Information