Human Resources Frameworks.

This document outlines Phoenix Group's Human Resources Frameworks which are in use across the Group, with regards to employment, equal opportunities and diversity, recruitment and learning and development.

Employment Framework

The Group wishes to be considered an employer of choice with a commitment to recognising, retaining and appropriately rewarding its employees. In order to achieve this, the following principles are recognised:

- The Group maintains robust frameworks which are benchmarked regularly against relevant companies to ensure best practice;
- Within the Group, trade unions and elected bodies are recognised for consultation and negotiation purposes with clear documented procedures and policies;
- The Group has processes in place to deal with disputes and grievances from employees and their representatives including allegations of discriminatory behaviour, harassment and bullying;
- Employees will be updated regularly on business progress with a variety of different channels being selected as appropriate for each message;
- · Employee involvement and feedback is actively encouraged;
- Employee surveys are used to establish levels of employee satisfaction and followed up by action plans to address issues and build harmonious employee relations;
- The Group ensures that all employment and training policies are compliant with the statutory and regulatory requirements of the labour markets within which it operates;
- The HR practice is audited regularly, and is reviewed at Executive Committee level;
- Family-friendly initiatives are in place to encourage flexible working and are consistent with the need to maintain effectiveness and levels of customer service; and
- Charitable contributions are made on behalf of the Group in accordance with the agreed policy and procedure.

Equal Opportunities and Diversity Framework

The Group promotes equality of opportunity regardless of sex (including pregnancy and maternity-related issues), religion / philosophical belief, marital status, civil partnership status, age, colour, race, ethnic or national origin or disability.

- All employees and applicants to the Group are given equal opportunity in all aspects of employment to ensure that the Group recruits, retains and promotes the best available talent; and
- Full and fair consideration is given to applications from, and the continuing employment and training of, disabled people.

Recruitment Framework

The Group recruits and retains employees who meet the initial entry and ongoing high standards of the organisation in relation to eligibility to work, performance, integrity and regulatory compliance.

In order to provide assurance that the Group is complying with legal and regulatory requirements and internal policies, appropriate documentation will be retained within the guidelines of the Data Protection Act.

The Company will have processes in place to ensure that the right people, based on skills and capabilities are in place to meet current and anticipated business needs. Senior Managers, supported by HR, are consequently responsible for:

- Checking that employees are properly qualified for the roles they perform;
- Ensuring that the need for Approved Persons status is considered as part of the recruitment process where necessary;
- Obtaining references and checking qualifications as part of the recruitment process;
- · Giving equal opportunity to all applicants; and
- Being fair, consistent and objective in their recruitment and selection process.

Learning & Development Framework

The Group provides an environment where individual development is encouraged and supported. Appropriate investment in training is made in accordance with individual ability, merits and needs and the needs of the Group.

The Group is committed to providing learning and development opportunities that:

- · Support the organisation in achieving its goals;
- Support our employees' skill development to ensure continued effectiveness in their roles; and
- Support our employees' continued personal and professional development to ensure career progression.

Development needs are identified by employees together with their line manager and are linked to the achievement of agreed business goals. Individual needs will be addressed through a variety of appropriate development interventions.