

# REPORTING GUIDELINES

## BACKGROUND

RSA have reported on environmental impacts since 1999. As a UK headquartered company reporting was initially based on DEFRA reporting guidelines, this has extended to cover wider CR related KPIs.

- Environmental targets were reintroduced in 2006 for UK and International businesses;
- A full CR policy suite and web based reporting system was introduced in 2007;
- Quarterly environmental reporting was introduced in 2008 and a secondary audit of carbon data was commissioned for the first time alongside the main CR audit. CR indicators were introduced in the Annual Report & Accounts; and
- In 2009 migration to a new web based reporting system commenced due to limitations on calculations and aggregation in the previous system.

## SCOPE OF REPORTING

Reporting covers all our UK, International and Emerging Markets businesses, including wholly owned subsidiaries, leased premises and our joint ventures. Where data is not provided we provide estimates based on:

- Relative calculations (e.g. based on FTE) against other RSA businesses; and
- Proximity to nationally stated averages.

Around 10% of our carbon footprint is based on this type of data where countries cannot provide accurate measurements from suppliers.

Each region is required to improve on their reporting each year in line with the principle of environmental management of continuous improvement.

## SELECTION OF KPIs

The KPIs used for reporting are selected from:

- DEFRA reporting guidelines;
- Company's Act 2006;
- PIRC guidelines (ABI requirement);
- GHG Protocol;
- Global Reporting Initiative;
- Climatewise; and
- UN Global Compact.

Indicators are selected on the basis of materiality to RSA and capability of local businesses to collect the data. The following limitations apply:

- Where office/businesses/countries are under 50 employees, data will be on a best endeavour basis;
- Each country varies significantly in the type of insurance written and customer; e.g. RSA Canada is a purely broker based business whereas Russia is personal lines only. This means aggregation of customer data to a single Group consolidated figure is not possible;
- Environmental quarterly reporting has been introduced (UK and International) to ensure progress towards successful achievement of publicly stated targets;
- Community data has been set to a half year cycle due to Emerging Markets providing data. The financial controllers in Emerging Markets were unable to support quarterly reporting; and
- HR data is improving over time. HR is managed in three separate business divisions and data is not yet fully aligned. Due to acquisition activity there continues to be differing management levels/structures and local legal requirements on Health and Safety information.

Indicator	Why	What	Example Evidence
Full-time equivalent	Used for assessing relative environmental efficiencies against other countries and national averages	Total year average FTE for site or sites	Spreadsheet from Human Resources providing details on a monthly basis or annual average.
Floor area (square metres)	Used for assessing relative environmental efficiencies of energy consumption against other premises and countries	Metre squared measurements on a site by site basis	Spreadsheet or document that lists sites and internal square metres.
Electricity	<p>Main environmental impact of RSA and required to reduce.</p> <p>Required under Company's Act and DEFRA guidelines.</p>	<p>Kwh or Mwh</p> <p>If the measures are unavailable please provide costs/bills.</p> <p>If part of multi-tenanted building please provide one of the following:</p> <ul style="list-style-type: none"> <li>• Landlord estimation of electricity use</li> <li>• Cost of electricity use</li> </ul> <p>If unable to provide any of the above request total consumption or charges for the building on electricity use and confirm any other types of non-office business in the building (e.g. catering would increase building use).</p> <p>Estimation based on the floor area or FTE occupation as a proportion of the building will be calculated taking into account any other building uses.</p> <p>If unavailable, please provide FTE and floor area to provide estimation.</p>	<p>Spreadsheets or invoices with energy consumption/bills.</p> <p>Communications from suppliers detailing information.</p>
Natural gas	<p>Major environmental impact of RSA and required to reduce.</p> <p>Natural gas is not used in all countries.</p> <p>Required under Company's Act and DEFRA guidelines.</p>	<p>Kwh or Mwh</p> <p>If the measures are unavailable please provide costs/bills.</p> <p>If part of multi-tenanted building please provide one of the following:</p> <ul style="list-style-type: none"> <li>• Landlord estimation of gas use</li> <li>• Cost of gas use</li> </ul> <p>If unable to provide any of the above request total consumption or charges for the building on gas use and confirm any other types of non-office business in the building (e.g. catering would increase building use).</p> <p>Estimation based on the floor area or FTE occupation as a proportion of the building will be calculated taking into account any other building uses.</p> <p>If unavailable, please provide FTE and floor area to provide estimation.</p>	<p>Spreadsheets or invoices with energy consumption/bills.</p> <p>Communications from suppliers detailing information.</p>

Indicator	Why	What	Example Evidence
District Heating (Natural Gas Combined Heat and Power)	A form of energy consumption found only in a few countries. Required under Company's Act and DEFRA guidelines.	<p>Kwh or Mwh</p> <p>If the measures are unavailable please provide costs/bills.</p> <p>If part of multi-tenanted building please provide one of the following:</p> <ul style="list-style-type: none"> <li>• Landlord estimation of use</li> <li>• Cost of use</li> </ul> <p>If unable to provide any of the above request total consumption or charges for the building on use and confirm any other types of non-office business in the building (e.g. catering would increase building use). Estimation based on the floor area or FTE occupation as a proportion of the building will be calculated taking into account any other building uses.</p> <p>If unavailable, please provide FTE and floor area to provide estimation.</p>	<p>Spreadsheets or invoices with energy consumption/bills.</p> <p>Communications from suppliers detailing information.</p>
Land-filled Waste	<p>Environmental impact of offices.</p> <p>Landfill is the main destination of any nonrecycled waste.</p> <p>Required under Company's Act and DEFRA guidelines.</p>	<p>Kgs or tonnes and confirm with the supplier that waste is going to landfill. If it's any other type of waste disposal (e.g. compost, incineration, etc) please notify the central CR team.</p> <p>If the measures are unavailable please provide costs/bills.</p> <p>If part of multi-tenanted building using a single waste supplier please provide one of the following:</p> <ul style="list-style-type: none"> <li>• Landlord estimation of waste</li> <li>• Cost of disposal</li> </ul> <p>If unable to provide any of the above request total waste or charges for the building on waste disposal and any other types of non-office business (e.g. catering which would increase waste). Estimation based on FTE occupation as a proportion of the building will be calculated taking into account any other uses.</p> <p>If unavailable, please provide FTE and floor area to provide estimation.</p>	<p>Spreadsheets or invoices with weights/bills.</p> <p>Communications from suppliers detailing information.</p>
Recycled Waste	<p>A key environmental impact and indicator to measure diversion of waste from landfill.</p> <p>Required under Company's Act and DEFRA guidelines.</p>	<p>Kgs or tonnes (Total).</p> <p>If different weights for types of recycling are available please provide in an additional note, e.g. glass, paper, cans, organic, etc.</p> <p>If the measures are unavailable please provide costs/bills.</p> <p>If part of multi-tenanted building using a single recycling supplier please provide one of the following:</p> <ul style="list-style-type: none"> <li>• Landlord estimation of recycling</li> <li>• Cost of recycling service</li> </ul> <p>If unavailable, please contact the CR team to set up a recycling (and waste) audit.</p>	<p>Spreadsheets or invoices with weights/bills.</p> <p>Communications from suppliers detailing information.</p>

Indicator	Why	What	Example Evidence
Water	<p>A key environmental impact and indicator of growing importance.</p> <p>Required under Company's Act and DEFRA guidelines.</p>	<p>Metres cubed (Total).</p> <p>If the supplier provides both consumption and sewage out, please make it clear in your notes. Sewage out is not a major material impact for offices.</p> <p>If the measure is unavailable from the supplier, please provide costs or bills.</p> <p>If a single bill/cost is unavailable and part of multitenanted building please provide one of the following:</p> <ul style="list-style-type: none"> <li>• Landlord estimation of use</li> <li>• Landlord portion of cost of use</li> </ul> <p>If unable to provide any of the above request total consumption or charges for the building on use and confirm any other types of non-office business in the building (e.g. catering would increase building use). Estimation based on the floor area or FTE occupation as a proportion of the building will be calculated taking into account any other building uses.</p> <p>If unavailable, please provide FTE and floor area to provide estimation.</p>	<p>Spreadsheets or invoices with consumption rates.</p> <p>Communications from suppliers detailing information.</p>
Diesel	<p>A key environmental impact although not a major one for office based companies usually.</p> <p>Required under Company's Act and DEFRA guidelines.</p>	<p>Litres used (UK metric).</p> <p>There is unlikely to be an accurate measure of the amount consumed. It is likely to be an estimate on the amount topped up in the backup generators.</p> <p>This could also be estimated from bills for the purchase.</p>	<p>Invoices or commentary outlining assumptions.</p>
Refrigerant gas loss	<p>A big emissions contributor although minor for office based organisations.</p> <p>Required under Company's Act and DEFRA guidelines.</p>	<p>Refrigerant gas R410a  Refrigerant gas HFC-134a  Refrigerant gas R407c  (all in kgs)</p> <p>Facilities or building managers should be able to find the amount of refrigeration added to the air cooling units during the year. It is important not to add the total capacity of the system.</p>	<p>Spreadsheets or invoices with consumption rates.</p> <p>Communications from suppliers detailing information.</p>

Indicator	Why	What	Example Evidence
Business travel - Local Flights	A part of emissions required under Company's Act and DEFRA guidelines.	<p>Passenger Km</p> <p>Travel providers should be able to provide a breakdown of km travelled.</p> <p>The category of local flights refers to those journeys which are 0-500km.</p> <p>If travel providers are unable to provide a breakdown of total km travelled within this distance bracket they may be able to provide number of journeys on certain routes between cities. This can be used to determine the distance.</p> <p>If no distance data is available please provide costs at a minimum.</p>	Spreadsheets or invoices with flight information from travel provider.
Business travel - Short Haul Flights	A part of emissions required under Company's Act and DEFRA guidelines.	<p>Passenger Km</p> <p>Travel providers should be able to provide a breakdown of km travelled.</p> <p>The category of local flights refers to those journeys which are 500-1500km.</p> <p>If travel providers are unable to provide a breakdown of total km travelled within this distance bracket they may be able to provide number of journeys on certain routes between cities. This can be used to determine the distance.</p> <p>If no distance data is available please provide costs at a minimum.</p>	Spreadsheets or invoices with flight information from travel provider.
Business travel - Long Haul Flights	A part of emissions required under Company's Act and DEFRA guidelines.	<p>Passenger Km</p> <p>Travel providers should be able to provide a breakdown of km travelled.</p> <p>The category of local flights refers to those journeys which are over 1500 km.</p> <p>If travel providers are unable to provide a breakdown of total km travelled within this distance bracket they may be able to provide number of journeys on certain routes between cities. This can be used to determine the distance.</p> <p>If no distance data is available please provide costs at a minimum.</p>	Spreadsheets or invoices with flight information from travel provider.
Business travel - Rail	A part of emissions required under Company's Act and DEFRA guidelines.	<p>Passenger Km</p> <p>Travel providers of should be able to provide the distance travelled or number of journeys broken down by routes.</p> <p>Alternatively the total spend and number of journeys will suffice.</p>	Spreadsheets or invoices from travel provider.
Business travel - Petrol Cars	A part of emissions required under Company's Act and DEFRA guidelines.	<p>Statute Mile</p> <p>Travel providers of should be able to provide the distance travelled. Caution should be exercised that car type is petrol.</p> <p>Alternatively the total spend or litres of fuel will substitute.</p>	Spreadsheets or invoices from travel provider.

Indicator	Why	What	Example Evidence
Business travel - Diesel Cars	A part of emissions required under Company's Act and DEFRA guidelines.	Statute Mile Travel providers of should be able to provide the distance travelled. Caution should be exercised that car type is diesel. Alternatively the total spend or litres of fuel will substitute.	Spreadsheets or invoices from travel provider.
Business travel - Alternative Fuel Cars	A part of emissions required under Company's Act and DEFRA guidelines.	Statute Mile Travel providers of should be able to provide the distance travelled. Caution should be exercised that the car type is specified: electric, LPG, hybrid, etc. Alternatively the total spend will substitute.	Spreadsheets or invoices from travel provider.
Company cars - petrol	A part of emissions required under Company's Act and DEFRA guidelines.	Statute Mile Internal travel providers of should be able to provide the distance travelled. Caution should be exercised that car type is petrol. Alternatively the total spend or litres of fuel will substitute.	Spreadsheets or invoices from travel provider.
Company cars - diesel	A part of emissions required under Company's Act and DEFRA guidelines.	Statute Mile Internal travel providers of should be able to provide the distance travelled. Caution should be exercised that car type is diesel. Alternatively the total spend or litres of fuel will substitute.	Spreadsheets or invoices from travel provider.
Company cars - hybrid	A part of emissions required under Company's Act and DEFRA guidelines.	Statute Mile Internal travel providers of should be able to provide the distance travelled. Caution should be exercised that the car type is specified: electric, LPG, hybrid, etc. Alternatively the total spend will substitute.	Spreadsheets or invoices from travel provider.
Paper - marketing	A part of emissions required under Company's Act and DEFRA guidelines. It's important to cover our direct marketing impacts and should cover any outsourced production too.	Kg or tonnes Total weight of paper should be available either based on kgs, tonnes or reams. If necessary data can be supplied in sheets and paper weight.	Spreadsheets or invoices from marketing, procurement or finance.
Paper - office	A part of emissions required under Company's Act and DEFRA guidelines.	Kg or tonnes Total weight of paper should be available either based on kgs, tonnes or reams. If necessary data can be supplied in sheets and paper weight.	Spreadsheets or invoices from marketing, procurement or finance.

Indicator	Why	What	Example Evidence
Environmental Targets	A best practice requirement under the international environmental management standard ISO14001.	<p>Percentage reduction targets should be supplied for each major impact of the local business, e.g. energy, water, waste, travel, paper, etc.</p> <p>The targets should be set against a baseline year of data. This data should be accurate and of good quality.</p> <p>If there are concerns about planned business growth, targets relative to employees or premium can be set.</p> <p>Any targets in this area should be set in conjunction with the Group CR team.</p>	Spreadsheet compiled by local CR representative.
Average number of days lost per employee	A requirement under the GRI reporting standard.	<p>National HR teams should provide an average based on the total number of days lost to any form of absence/injury divided by the number of employees.</p> <p>The calculation should also be provided with disaggregated numbers.</p>	Returned template initially sent by CR team.
Reportable serious injuries	A requirement under the GRI reporting standard.	<p>National HR or H&amp;S teams should provide the total number of serious injuries and the criteria this is categorized, e.g. a legal definition or otherwise.</p> <p>Examples of the injuries would be helpful.</p>	Returned template initially sent by CR team.
Non-reportable minor injuries	A requirement under the GRI reporting standard.	<p>National HR or H&amp;S teams should provide the total number of minor injuries and the criteria this is categorized, e.g. a legal definition or otherwise. Examples of the injuries would be helpful.</p> <p>If minor injuries are not reported, please confirm.</p>	Returned template initially sent by CR team.
Accidents per 1,000 employees in the workplace	A requirement under the GRI reporting standard.	<p>National HR or H&amp;S teams should provide the total number of injuries (major and minor) and the total year average FTE.</p> <p>The country can choose to rationalize these numbers on a scale (total incidents/ 1,000 employees) or send the two separate numbers (national FTE /total incidents) to the CR team.</p>	Returned template initially sent by CR team.
Charitable donations	Required under Company's Act and Corporate Governance	<p>GBP£ or equivalent local currency</p> <p>Financial controllers should provide a full list from SAP and then checked with local CR representative to make sure comprehensive.</p> <p>Donations should be itemized on the CoSec template covering:</p> <ul style="list-style-type: none"> <li>• English translation of charity</li> <li>• Whether it's political</li> <li>• Whether there is a receipt</li> </ul>	Returned template to CoSec and CR.

Indicator	Why	What	Example Evidence
Employee raised funds	Required under London Benchmarking Group charitable standard	GBP£ or equivalent local currency. CR representatives should provide itemized list of monies raised by employees for charities in corporate time. This should not include any corporate donations.	Returned template to CR.
Volunteers	Required under Company's Act	Number of volunteers and total hours volunteered. CR representatives should provide a total number of company volunteers for the year and the total number of working hours they donated. Volunteer numbers where the company has supported or led the event can be claimed, e.g. an RSA led weekend tree planting event. The actual volunteer hours outside of company time cannot be counted, e.g. someone spending 6 hours on a Saturday helping a school.	Returned template to CR.
Gifts in kind	Required under London Benchmarking Group charitable standard	Number and type of gifts itemized. CR representative should collate for the country. An approximate conservative estimate of the value in local currency should be assigned.	Returned template to CR.
Customer satisfaction	General best practice and part of GRI standard	Percentage of customers satisfied by major lines or types of business. Marketing functions should have access to information. The percentage might be based on claims satisfaction or overall experience. Please specify which.	Returned template to CR.
Response time to claims	General best practice and part of GRI standard	Average response time in days for claims split by major lines or types of business. Claims teams will have access but may categorise by time to respond and to resolve.	Returned template to CR.
Number of complaints	General best practice and part of GRI standard	Number of complaints by major lines or types of business. If possible to be expressed as a percentage of customers too in that particular line of business. Marketing or customer functions should be able to provide.	Returned template to CR.
Lifelong learning	Part of GRI standard	Series of 'yes' or 'no' questions for national HR representative to answer.	Returned template to CR.
Performance and Career Development	Part of GRI standard	National or regional HR representative to provide percentage of employees undergoing a performance review.	Returned template to CR.

Indicator	Why	What	Example Evidence
Average Training per Employee	Part of GRI standard	Average of hours training per employee, ideally split by management level. Please specify if this includes all types of training, e.g. only online, etc.  If management levels differ from 1-6 categorisation please explain the categories and staff types under each, e.g. where are the management grades.	Returned template to CR.
Average FTE per Site	Part of GRI standard and needed for environmental data normalization.	Please provide the average FTE for the year at each site. If large numbers of sites, focus on those over 50FTE.	Returned template to CR.
FTE by employment status	Part of GRI standard	Average FTE for the year by type of employment: Permanent, Temporary, Fulltime and Part-time.	Returned template to CR.
FTE by gender and level	Part of GRI standard	Average FTE for the year broken down by management level and gender.  If management levels differ from 1-6 categorisation please explain the categories and staff types under each, e.g. where are the management grades.	Returned template to CR.
Employee turnover	Part of GRI standard	Work out the number of leavers over the year within each category and gender. Multiply this by 100 and divide by the average FTE for the year in these categories by gender.  If unable to work out, please provide numbers of leavers and average FTE for the year in all three sections.	Returned template to CR.
Basic salary by level and gender	Part of GRI standard	Work out the average salary by management level and gender.  Express the female average salary as a ratio with the average male salary, e.g. 1:1.50 would be the average female is paid 50% more than the average male.	Returned template to CR.
Total number of incidents of discrimination and actions taken	Part of GRI standard	Provide the total number of discrimination incidents and any actions taken.	Returned template to CR.
Percentage of employees covering in collective bargaining agreement	Part of GRI standard	State if collective bargaining is allowed in the country and if there is a percentage of employees that it relates to, e.g. 100%.	Returned template to CR.
Minimum notice period for operational changes (included in collective bargaining agreement)	Part of GRI standard	Provide the minimum notice period for operational changes and specify if its included in the collective bargaining agreement. E.g. 30 days and yes included.	Returned template to CR.
FTE by ethnicity	Part of GRI standard	Provide a breakdown of average FTE by management level and ethnicity. Please do not provide estimated data.  If illegal to collect data, please do not collect.	Returned template to CR.