

Moneyfacts[®]
Group plc







Moneyfacts Group Corporate Governance Policies







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This pack contains Moneyfacts Group’s range of corporate governance policies. These are:

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CORPORATE POLICIES

Moneyfacts Group Values

Although we are based in Norwich, we are relied upon by the financial industry across the UK, and have been in business for 35 years.

Our culture is implicit throughout the organisation and our staff are proud of it. Our core values are reflected in our culture and highlighted here.

Impartiality

- We are independently owned and entirely impartial
- We treat everyone with fairness
- Our awards and best buys promote competition based solely on product quality



Respect

- We respect the contribution of ideas from all members of our team
- We treat others with dignity and respect
- We treat all customers fairly, with no exceptions



Trust

- We can be relied upon for our services that we have been delivering since 1988
- Trust and confidence exist to ensure that everyone can operate without fear or favour
- Our market-leading products and services are trusted by the industry, regulators and journalists



Quality

- We can be relied upon for the accuracy of our products and services
- We respond to all customer enquiries both quickly and accurately
- We pride ourselves on the quality of our data



Moneyfacts Group Environmental Policy

Our Commitments:

Moneyfacts Group recognises that, like all businesses, it has a role to play in minimising its impact on the environment. We are committed to:

- Identify the areas of our business where we can improve our environmental performance and to take steps to do so:
- ensure our office environment minimises its impact by reducing our energy consumption:
- ensure our publications are printed on responsibly produced paper:
- reduce our usage of paper and ink by using electronic documents where we can:
- giving our staff the means to recycle food packaging, non-confidential paper etc:
- monitoring our key suppliers to ensure our supply chain is making improvements in environmental performance:
- recycling / gifting redundant office equipment such as IT kit, where appropriate to do so:
- encouraging the use of green transportation to the working environment.

Our Actions:

To meet these commitments, we are doing the following things:

Our Office –

- All of our electricity supply comes from renewable sources.
- Through specific actions taken, including replacing light bulbs, not lighting unused rooms and reduced usage of our air conditioning system to an 'as needed' approach, between quarter three 2022 and quarter three 2023 our electricity consumption has reduced by 19%.
- We have begun to replace all the windows in our office building and also re-roofing our office building including improving roof insulation, which will decrease our gas emissions through reduced usage of the heating system.
- Our boiler has been upgraded to one that has an Er-P rating of 'A'.
- We have installed Electric Vehicle charging points in the office car park.
- Our awards ceremonies are hosted at venues that are actively managing their environmental impact.
- We have completed a base-year calculation of Scope 1 and Scope 2 emissions.

Our Staff –

- We have recycling bins located around the office for paper, cans, cardboard etc.
- We have agreed a discounted bus travel scheme for our staff and promote train travel for business meetings wherever possible, to promote use of public transport.

Our Magazines –

- Our print supplier is ISO 14001:2015 Certified (Environmental Management Systems) and all our publications are printed on FSC (Forestry Stewardship Council) Certified paper, using vegetable-based inks.
- All white paper used in our magazines is Carbon Balanced through offsetting measures either through the World Land Trust or Woodland Trust schemes.
- Our own Moneyfacts Pink Paper will move to be Carbon Balanced via an additional payment per tonne to be used in appropriate offsetting measures.

Moneyfacts Group IT Security Policy

Our Commitments:

Moneyfacts Group recognises that there is both a legal and moral requirement to properly secure all confidential/personal data used by Moneyfacts to perform its function. We are committed to:

- ensuring all data entrusted to us by customers is stored securely.
- ensuring access to customer data held within our systems is only granted to those employees who need it to perform their duties.
- only transmitting data using secure technologies.
- raising staff awareness regarding the importance of data security.
- maintaining hardware and software systems to manage the protection all data.
- conforming to all aspects of the UK Data Protection Act 2018.

Our Actions:

To meet these commitments, we are doing the following things:

Our Infrastructure –

- We operate next generation firewalls with a rigid patching regime for updates.
- We run fully monitored Extended Detection and Response (XDR) system on all our servers and desktops.
- All access to elevated accounts requires multi-factor authentication.
- Segregated access to shared drives based on agreed user privileges.
- Public-facing servers are segregated from the rest of the IT Estate.
- IP Geo-blocking in place for Consumer-Facing Systems.
- Access to B2B systems granted as needed and require valid username/password and must be accessed via an approved IP address.
- All software patches received from vendors applied in a timely manner.

Our Staff -

- New Staff are given IT Acceptable Use, Data Security and Cyber Awareness training as part of their induction process.
- All staff have an annual Cyber Awareness refresher.
- Access to email requires Multi-Factor Authentication.
- Remote access to Moneyfacts Systems uses a secure desktop client and requires Multi-Factor Authentication.

Moneyfacts Group Business Continuity Policy

Our Commitments:

Moneyfacts Group understands that its products and services are integral to its customers' business processes. We are committed to:

- provide a first class and timely service to both retail and commercial customers alike, no matter what conditions we face:
- avoiding system outage by the preparation and effective implementation of our Business Continuity plan:
- ensuring the Business Continuity plan covers all significant business risks, including physical, technical and cyber-related risks.

Our Actions:

To meet these commitments, we are doing the following things:

- We have a detailed Business Continuity Plan covering all relevant business risks, both internal and those relating to our suppliers, which are documented, prioritised and mitigating actions identified.
- The plan provides for actions to be taken, when and by whom in the event of a business-critical issue, moving from Disaster Recovery through Business Continuity and back to Business as Usual. The plan is reviewed at least annually to ensure it remains fit for purpose, with some areas reviewed quarterly.
- Penetration testing is completed monthly by a contracted third-party IT security consultancy.
- As an IT-reliant business, we have a full restore/rebuild plan that is reviewed regularly.
- Our entire data estate is backed up daily and stored securely in an off-site location.
- We have invested in our security systems and protocols to improve resilience against cyber-attack, including real-time system monitoring anti-virus software.
- We have installed an electricity generator to ensure ongoing supply should our office electricity supply become compromised.
- Our people all have remote access to Moneyfacts Group systems, reducing reliance on office-based working, should the building become unusable.
- We are looking to further mitigate key risks by having less reliance on our network, and moving to cloud-based processing, offering further-improved resilience.
- Key elements of the plan are tested based on particular scenarios, for example power outage or loss of host server.
- All staff are required to complete annual cyber-awareness training.

Moneyfacts Group Financial Crime Policy

Our Commitments:

Moneyfacts Group upholds the highest ethical and legal standards and is committed to ensuring that none of its activities are at risk of being used to further any form of financial criminality. We are committed to:

- ensuring our business activities cannot be used for money laundering or terrorist funding purposes:
- ensuring that no business process is open to fraudulent or dishonest activity, in accordance with our Anti-Bribery policy
- training our staff to identify and report suspicious activity, such as online scams, that may result in financial harm to the business or its employees.

Our Actions:

- None of our business to consumer activities involve acceptance of any form of payment from a customer. All accounts are set up direct with the product provider.
- All providers we introduce to are authorised by the Financial Conduct Authority and subject to the UK's anti-money laundering regulations.
- Our business-to-business customers are primarily UK-authorised firms and are covered by UK anti-financial crime legislation.
- Internal financial control procedures ensure all payments made by staff are authorised or scrutinised by a third party, and subject to audit.
- Annual cyber security training is obligatory for all staff, as well as ad hoc test phishing etc emails throughout the year.
- We report any suspicious activity to the relevant UK authorities.

Due to the nature of our business and our customers, Moneyfacts Group's overall risk of being used to further financial crime is low.

Moneyfacts Group Health & Safety Policy

Our Commitments:

It is the policy of the Group that its operations are executed at all times in such a way as to ensure, so far as is reasonably practicable, the health, safety and welfare of all employees and all other persons likely to be affected. We are committed to:

- providing a safe and healthy working environment for all staff and visitors
- ensuring all staff are aware of their obligations to act in a safe manner.

The Executive Chairman accepts ultimate responsibility for compliance with all relevant health and safety legislation, however, the nominated Board Director for day-to-day health and safety management will be the Finance Director. The Office Manager has been delegated the responsibility of providing an advisory service on all health and safety matters, acting as Health and Safety Co-Ordinator.

Our Actions:

The Group will take all reasonably practicable steps to meet its obligations and ensure the following:

- We maintain and evaluate a risk assessment-based approach towards the management of health and safety.
- Our equipment and systems of work are safe so far as is reasonably practical, and with low or minimal risks to health.
- We have in place appropriate arrangements to deal with, so far as is reasonably practicable, safety and absence of risk to health in connection with the use, handling, storage and transport of chemicals and substances.
- We provide sufficient information, instructions, training and supervision to enable all existing and new employees to avoid hazards, be competently trained and contribute positively to their own and to others' safety and health at work.
- We maintain a safe, tidy and healthy condition in all places of work with suitable means of access to them.
- We undertake regular auditing and safety inspection, and fully investigate accidents to eliminate similar occurrences.
- Adequate welfare facilities, e.g. toilets, cloakroom, kitchen amenities etc are provided for all staff.

Employee's Duty of Care

Employees have a duty to co-operate with these objectives by observing the Group rules and procedures, by working in a safe manner so as not to endanger themselves or their colleagues and when necessary, by using all appropriate protective clothing and safety equipment provided by the Group for their health and safety at work.

Consultations

The Group encourages all its employees to actively participate in health and safety consultations.

PEOPLE POLICIES

Moneyfacts Group Dignity at Work Policy

Our Commitments:

Moneyfacts Group requires its staff to treat anyone within the working environment with dignity and respect, and to understand that behaviour that they may find acceptable may not be regarded as such by others. Behaviour that undermines this aim is unacceptable. We are committed to:

- dealing with any form of harassment, bullying, intimidation or other inappropriate behaviour that causes offence, whether intentional, or not.
- ensuring that our staff do not feel like they are being treated differently because of race, colour, nationality, ethnic or national origin, religion or belief, disability, trade union membership or non-membership, sex, pregnancy/maternity, gender reassignment (gender identity or trans-status), sexual orientation, married or civil partnership status, age, or being a part-time or fixed-term worker, or as a result of being subject to any inappropriate behaviour.
- preventing inappropriate behaviour because of association with people with the above characteristics or those perceived to have these characteristics.
- ensuring that, while implementing and upholding the policy is the duty of Management, everyone has a responsibility to ensure that bullying and harassment have no place in the work environment.

Our Actions:

The Group will take all reasonably practicable steps to meet its obligations and ensure the following:

- Harassment and bullying will be fully investigated and where found will be treated as misconduct, which may include gross misconduct, warranting dismissal.
- We aim to be responsive and supportive to anyone who makes a complaint, provide full and clear advice on the procedure to be adopted and maintain confidentiality in all cases.
- We will take steps to ensure that there is no further problem or victimisation. We will endeavour to eradicate victimisation and/or retaliation.

What is Harassment and Bullying?

Harassment is unwanted conduct that violates a person's dignity or creates an intimidating, hostile, degrading, humiliating or offensive environment for them.

Bullying is defined as persistent behaviour against an individual which is intimidating, offensive, insulting or malicious and which undermines their confidence and self-esteem. It can be a sustained form of psychological abuse that makes the recipient feel demeaned and inadequate. Bullying is also unacceptable behaviour, and will be regarded as gross misconduct. A complaint of bullying will be dealt with in the same way as harassment.

Harassment and bullying may be against one or more people, and may involve single or repeated incidents, ranging from extreme forms of intimidating behaviour, such as physical violence, to more subtle forms such as persistently ignoring someone. This can occur without witnesses; taking place in face-to-face interactions; as well as online in or outside of work.

Effects of Harassment and Bullying

Harassment and bullying can extract a high price. Workers can be subject to fear, stress and anxiety, which can put great strain on personal and family life. Harassment and bullying can lead to illness, absenteeism, an apparent lack of commitment, poor performance, reduced productivity and resignation.

Moneyfacts Group Equal Opportunities/Diversity & Inclusion Policy

Our Commitments:

Moneyfacts Group aims to be an equal opportunities employer and undertakes to apply objective criteria to assess merit. Our workforce and job applicants should not be disadvantaged by any policies or conditions of service which cannot be objectively justified as necessary for operational purposes. It is important that everyone is actively involved in creating a positive working environment and supporting anyone who is not being treated fairly.

We are committed to:

- Ensuring that members of our workforce feel sufficiently respected and able to give of their best.
- Creating and fostering a supportive and understanding environment in which all individuals realise their maximum potential within Moneyfacts, regardless of their differences.
- Employing the best people to do the best job possible.

Our Actions:

- Management will ensure that recruitment, selection, training, development and promotion procedures result in no job applicant or worker receiving less favourable treatment.
- Individuals are selected, promoted and otherwise treated solely on the basis of their relevant aptitudes, skills and abilities.
- Everyone must make sure that people with protected characteristics, as defined within the Equality Act, do not receive less favourable treatment on the grounds of:
 - Sex/gender
 - Race, colour, nationality, ethnic or national origin
 - Disability
 - Pregnancy/maternity/paternity
 - Age
 - Married or civil partnership status
 - Gender reassignment (gender identity or trans-status)
 - Sexual orientation
 - Religion or belief
- We will not accept discrimination by association or perception. Associative Discrimination occurs when an individual is discriminated against “on the grounds of association or perception” under the protected characteristics identified above. Discrimination by perception is discrimination against an individual because it is thought they possess a particular protected characteristic, regardless of whether this is correct.
- Victimisation is when someone suffers a detriment that is in retaliation for their involvement in bringing, or supporting, a complaint of discrimination. This is not acceptable behaviour.
- Management has the primary responsibility for successfully meeting these objectives. This means:
 - not unlawfully discriminating against workers, job applicants, or anyone else within the working environment.
 - Not inducing or attempting to induce others to practise unlawful discrimination.
 - Making employees aware that they will be subject to action under the Disciplinary Procedure for unlawful discrimination of any kind; and
 - Taking appropriate action if they become aware of any form of unlawful discrimination.

Moneyfacts Group Modern Slavery Policy

Our Commitments:

There are many different characteristics that distinguish what is termed modern slavery from other human rights violations, however, only one characteristic needs to be present for slavery to exist. We are committed to:

- Having a zero-tolerance approach to any form of modern slavery.
- Developing and adopting a proactive approach to tackling modern slavery and hidden labour exploitation.

Our Actions:

- Moneyfacts is independently owned and entirely impartial. We operate in the UK only. We do not outsource any part of our business. We review our Modern Slavery Act Policies when changes in legislation dictate, otherwise at least annually.
- Having reviewed in detail and considered our risks we believe our only exposure is where we sometimes employ temporary agency staff. We have confirmed these are not paid less than the minimum statutory wage rate.
- We undertake our responsibilities to ensure that we are a reputable employer by ensuring that there is no modern slavery or hidden exploitation in our own business and our supply chain.
- Our existing policies, including whistleblowing, allow for employees to confidentially report any such concerns so that they can be investigated.

What is Modern Slavery?

Someone is in slavery if they are:

- forced to work - through mental or physical threat; or
- owned or controlled by an 'employer', usually through mental or physical abuse or the threat of abuse; or
- dehumanised, treated as a commodity or bought and sold as 'property'; or
- physically constrained or has restrictions placed on his/her freedom of movement.

Contemporary slavery takes various forms and affects people of all ages, gender and races. It is understood that it is often well hidden by the perpetrators, with victims, if they perceive of themselves as such, reluctant to come forward.

Our supply chains

As a service provider there are relatively few supply chain risks in our business. With our primary cost of sale being our staff, we are basically a consumer of services delivered by UK companies. In terms of our suppliers no relationships are unique to us and we are dealing with suppliers who themselves are often blue-chip companies or supply blue-chip companies or indeed are one-man-band sole traders.

Moneyfacts Group Anti-Bribery Policy

Our Commitments:

Moneyfacts Group upholds highest standards of ethical conduct and integrity in our business activities. This policy is to maintain our reputation and protect our employees, and should avoid any misinterpretation or misunderstanding. It is also designed to ensure that employees do not find themselves in a potentially vulnerable position. We are committed to:

- acting with integrity in all our dealings.
- not tolerate any form of bribery by, or of, our employees, agents or consultants or any person or body acting on its behalf.
- implementing effective measures to prevent, monitor and eliminate bribery.
- complying with both the spirit and letter of the law regarding bribes, kickbacks or other illicit forms of payments, and maintain our reputation for fair dealing with third parties.
- only purchasing and providing goods/services based on quality, service and business needs.
- making the prevention, detection and reporting of bribery and corruption the responsibility of all employees.

Our Actions:

- Our terms of employment require that staff shall not employ or participate in dishonest methods or schemes for the purpose of obtaining personal or business advantage or reward, including methods involving fraud, deceit and any action that does not comply with legislation.
- Our staff must not commit an act with the purpose of inducing a person to act improperly, or be in receipt of gifts, gratuities, entertainment or other favours which may be interpreted as inducing them to act improperly. They shall not in any way offer, give, solicit or receive any bribes, kickbacks or other illegal or improper payments, transfers or receipts.
- Staff are not permitted to bribe another person or company, by giving or offering financial or other advantage, to gain or reward the improper exercise of an organisational activity. A gift to a third party may be interpreted as a bribe. The only exceptions to this are gifts of a trifling nature and value, or hospitality authorised by the organisation.
- We have established detailed risk management procedures to prevent, detect and prohibit bribery. We will conduct risk assessments for each of our key business activities on a regular basis and, where relevant, will identify business areas, employees or officers of Moneyfacts Group that are in positions where they may be exposed to bribery.
- Employees and associated persons are required to complete a bribery risk assessment form. We will regularly communicate our anti-bribery measures to employees and associated persons. We will set up training sessions where applicable.

Charitable and Political Donations

We consider that charitable giving can form part of a wider commitment and responsibility to the community. Moneyfacts Group supports charities that are selected in accordance with objective criteria, following a risk assessment. We may also support fundraising events involving employees.

We do not make donations to any political parties. Employees and associated persons are not permitted to make any political donations to organisations on behalf of Moneyfacts Group.