

# Maintaining regulatory compliance and policy advocacy

## Our approach

*We adhere to a broad range of regulations across jurisdictions and sectors, including highly regulated sectors such as financial services, pharmaceuticals and food. As a multinational we are also subject to the taxation requirements of a number of countries.*

Our legal compliance programme serves to increase awareness and enhance compliance with applicable legislation. Our divisional boards and risk committees oversee compliance and report quarterly to the group's audit and risk committees. Divisional systems and control processes are monitored and managed by legal and compliance units and internal audits are undertaken in all operations to assess critical compliance processes and controls. Where required, external compliance assessments may also be undertaken.

To maximise synergies and cooperation, legal and compliance officers meet quarterly to monitor and report on emerging and key legislative and compliance matters, and to formulate group plans to implement the requirements of new legislation. The forum also coordinates group responses to draft legislation.

We monitor legislative developments on an ongoing basis and we proactively engage with regulators through a number of industry bodies and business associations. This helps us to anticipate and assess the potential impact of upcoming regulatory changes, allows for seamless workflow once the requirements take effect and reduces compliance risk. It also allows us to share our industry expertise and contribute to policy development.

## 2017 PERFORMANCE

**ONE GRIEVANCE RELATING TO A BREACH OF CUSTOMER PRIVACY WAS REPORTED DURING THE YEAR AND WAS SUCCESSFULLY DEALT WITH AND ONE FINE FOR NON-COMPLIANCE WITH AN ENVIRONMENTAL LAW WAS INCURRED**

(discussed on page 14).

### Strengthening our compliance framework

In Imperial Logistics Africa, we centralised selected specialist functions where compliance risk is high, particularly in the areas of insurance and contracts. In South Africa, our Protection of Personal Information (POPI) working groups continued to work on our systems design, cybersecurity and governance structures to make sure that we are ready for the enactment of the POPI Act. A data quality management programme and policies covering privacy and data retention are in place and cover our third parties. Senior managers were trained on the requirements of the Competition Act and we rolled out a cyber awareness programme covering ransomware, phishing, the responsible use of mobile devices and the importance of passwords and security.



*SDW: Imperial Logistics and Motus reviews; more information on regulatory compliance (pages 27 and 25 respectively).*

### GRI G4 index

GRI G4-2, G4-14, G4-15, G4-26 to 27, G4-51, G4-56, G4-58, LA12, LA16, EC2, EC7 to 8, EN3, EN8, EN15 to 16, EN24, EN29, HR4 to HR6, S01, S05, S08, PR8