

DE BEERS PENSION FUND

FUND POLICY DOCUMENT

COMMUNICATION POLICY

Revision no	Review cycle	Effective date
013	At least every two years	10 April 2025



DEFINED BENEFIT



DEFINED CONTRIBUTION

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1. INTRODUCTION

The Fund is a self-administered restricted hybrid pension fund consisting of a Defined Benefit (DB) Section and a Defined Contribution (DC) Section, predominantly for South African employees and pensioners of certain companies within or associated with the De Beers Group.

For the purpose of this policy, members refer to all categories of working members and pensioners (including beneficiaries of deceased working members / pensioners) as set out in the Rules of the Fund. The delivery of benefits requires communication with members, as well as with several other stakeholders.

2. SCOPE

The policy applies to the Fund, its employees, the relevant service providers, the Communication and Education Board Committee (the Committee) and the Board.

3. REGULATORY AND GOVERNANCE FRAMEWORK

The policy takes account of and is drafted in accordance with the following:

3.1 Pension Funds Act, Regulations And Circulars

In terms of Section 7D(c) of the Pension Funds Act No. 24 of 1956 (the Act), the Board is ultimately responsible to ensure that sufficient and appropriate information is supplied to its members, to inform them of their rights, benefits, duties and obligations in terms of the Rules of the Fund, subject to such disclosure requirements as may be prescribed.

Circulars PF86 (Disclosure requirements to be observed by funds) and PF90 (Minimum information to be disclosed) issued by the Financial Sector Conduct Authority (FSCA or the Authority) set out the minimum information to be communicated to members of the Fund during their period of membership. Furthermore, Circular PF130 (Good governance for retirement funds) requires all retirement funds to have a communication policy based on:

- an investigation into the membership of the fund with the focus on the demographics, literacy levels, geographical distribution and preferences of all members;
- the communication of the objectives of the fund;
- an analysis of the information and messages to be communicated to members to meet the identified objectives, complying with, but not limited to, the minimum communication requirements of the Act and of FSCA Circulars PF86, PF90 and PF130;
- an analysis of the most effective media to be used to reach all the members identified and to ensure that members are educated on all fund matters; and
- a procedure for the evaluation of the success of the fund's communications.

In addition, Regulations 37, 38, 39 and 40 (referred to as the "Default Regulations") issued under Section 36 of the Act, which came into effect on 1 March 2019, require retirement funds to:

- establish a default investment strategy for those members who do not exercise a choice on how their retirement savings are to be invested;
- facilitate the preservation of members' retirement benefits when they change employment;

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- provide benefits counselling to members about their retirement benefits ¹; and
- provide an annuity strategy for retiring members.

3.2 Treating Customers Fairly

The FSCA Treating Customers Fairly (TCF) Roadmap details the broad principles that the Board should consider ensuring that members experience certain “fairness outcomes”, which include among others the Fund’s member communication. For the purposes of the Fund, the Board has interpreted TCF as Treating Members Fairly (TMF).

3.3 King IV Report on Corporate Governance for South Africa (King IV)

King IV sets out the philosophy, principles, practices and outcomes which serve as the benchmark for corporate governance in South Africa. It aspires to apply to all organisations, including retirement funds. The Fund, taking account of the guidance contained in the Sector Supplement for Retirement Funds, is fully committed to the principles and practices that are applicable to the Fund. This holds particularly, insofar as it relates to the Fund’s communication, for Principle 5 (which deals with reports issued by the Fund) and Principle 16 (which addresses stakeholder relationships).

4. DEFINITIONS AND ACRONYMS

In this policy, unless inconsistent with the context, the following words shall have the following meaning:

Definition / Acronym	Description
The Board / Trustees	Board of Trustees
FSCA or the Authority	Financial Sector Conduct Authority
SOPs	Standard Operating Procedures
TCF / TMF	Treating Customers Fairly / Treating Members Fairly
The Committee	Communication and Education Board Committee
The Fund	De Beers Pension Fund

5. RESPONSIBILITIES AND AUTHORITY

Designation	Responsibility
The Board	• To approve the policy and revisions on the recommendation of the Committee.
The Committee	• To review and recommend the policy and revisions to the Board for approval.
Principal Officer	• To take ownership of the policy and provide interpretations as required;

¹ The Fund will, however, ***NOT*** provide individualised benefits counselling in the form of financial advice to members, and no Fund communication should be construed by members as providing advice. Benefits counselling as contemplated in the Default Regulations will be provided by the Fund through the formal means of communication detailed in the Fund’s Communication Strategy.

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Designation	Responsibility
	- To ensure that the policy is implemented and regularly updated, as appropriate; - To promote and ensure compliance with the policy by all concerned; and - To deal with any queries related to the policy.
Secretarial and Communications Manager	- To draft and maintain the policy, in consultation with the Fund Management and the Fund's Communication Consultant; - To align the policy to the Fund's other associated policies and procedures, as well as regulatory requirements and provisions; - To ensure that the Fund Communication Strategy is aligned to this policy and is implemented; and - To advise the Principal Officer of any non-compliance with the policy.

Any authority or matter concerning communication not provided for in this policy must be referred to the Principal Officer who may in consultation with the Chairpersons of the Committee and the Board exercise his/her discretion in dealing with the issue prior to reporting the matter at the next scheduled meeting of the Board, along with a proposed policy change, if appropriate.

6. RELATED DOCUMENTS

This policy should be implemented and considered in conjunction with the Fund's Communication Strategy, which offers a detailed breakdown of the audiences, key messages, media to be used, timing of communication and expected costs involved.

7. POLICY

7.1 Purpose

The purpose of this policy is to formalise the communication responsibility of the Trustees towards its members and other stakeholders.

To this end, the Board commits to clear, simple, transparent, appropriate and comprehensive communication delivered in a cost-effective and timeous manner, via media and other platforms that are easily accessible. Specifically, this aims to ensure that:

- the Board's duty of providing adequate and appropriate information to members in terms of the regulatory and governance framework is met;
- members gain a better understanding of the investment and any other risks that are inherent in the Fund's structure;
- members can make informed decisions (in terms of investment choices when wishing to withdraw funds or when they retire); and
- the resources of the Fund are used in a responsible, cost-effective manner to achieve the objectives of this policy.

The Board recognises that the focus of the Fund's Communication Strategy is the transfer of knowledge and understanding as opposed to the mere distribution of information.

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7.2 Obligations of Key Role Players

7.2.1 The Fund

The Fund's Secretarial and Communications Department, with the assistance of external consultants as may be required from time to time, will be responsible to develop communication material in line with the Fund's Communication Strategy. Where necessary, such communication will receive input from the Principal Officer, Chief Operating Officer and Fund Manager, as well as other Fund employees as deemed appropriate.

Any material that communicates Fund information to members in general (Fund newsletters, member guides, annual reviews and appropriate ad-hoc communication) must be approved by the Committee before it is circulated to members.

Excluded from the above are member-specific communications not applicable to all members, for example Newsflashes, responses to queries and providing clarification to individual benefit entitlements,

Where deemed appropriate by Fund Management and/or the Committee, technical specialists such as the Fund Actuary, Investment Advisors, Communication Consultant and Legal Advisors may also be requested to review communication material.

7.2.2 Members

While the Fund fully accepts its accountability for member communication, members themselves remain personally accountable to ensure that they remain updated and informed regarding their Fund benefits, as well as legislative and other developments affecting the Fund.

It is important that members review all forms of available Fund communication, accept the responsibility of reading and understanding all communications directed at them, attend Fund information sessions as appropriate, refer queries to the Fund for clarification and provide the Fund with feedback, should their information requirements not be met.

After accepting accountability, members should themselves take responsibility for ensuring that they make adequate financial provision for their retirement or preserve their benefits on withdrawal.

In addition, members are required to familiarise themselves with the Rules of the Fund to enable them to understand their rights, duties, obligations and benefit entitlements. This includes their rights, and the required procedures, relating to lodging complaints.

Furthermore, members are expected to keep their personal information and contact details, and those of their dependants, where required, up to date with the Fund.

7.3 Main Objectives of Communication

A comprehensive list of specific communication objectives appears in the Fund's Communication Strategy, together with communication initiatives for a rolling three-year period. However, the overriding objectives of Fund communication are the following:

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- Empowering members to understand and take ownership and accountability for their retirement planning or preserving their benefits and for the need to remain informed of all relevant aspects of this important benefit;
- Providing Fund information regarding members' benefits, investment risks, and options at withdrawal and retirement through access to legislation-compliant, clear and understandable information conveyed via a range of accessible user-friendly media ²; and
- Promoting a positive image of the Fund that is consistent with the Fund's core values of service excellence and the fair treatment of members.

7.4 Principles of Communication

In terms of this policy, communication should:

- comply with the requirements of the Fund's regulatory and governance framework;
- be complete and accurate (without being so lengthy as to 'lose' readers);
- be useful, appropriate and relevant;
- be timely;
- be contemporary, friendly, honest and 'human';
- be written in a simple, easy-to-read manner, to the extent that this is possible when dealing with pension fund information;
- be structured in such a way that information is layered, with important aspects highlighted and more detailed information available;
- deal with the information needs that members have about the Fund;
- appeal to members from different backgrounds;
- be based on regular and latest research (where appropriate);
- be promoted as an ongoing, two-way process;
- be confidential at a member level;
- be priced in such a way that it offers good value for money;
- use appropriate media to reach a range of members;
- be produced (in the case of printed material) in English, but with telephonic support being available in other languages where possible;
- not expose the Fund to legal liability for loss or damages; and
- emanate from the Principal Officer as the Fund's officially designated spokesperson to ensure consistency and create a single point of reference.

7.5 Audiences

Direct communication to members forms the main focus of Fund communication. However, identified secondary audiences play a supporting role and sometimes act as conduits for the flow of Fund information to members and should also receive communication when relevant.

² The Fund will, however, **NOT** provide individualised benefits counselling in the form of financial advice to members, and no Fund communication should be construed by members as providing advice. Benefits counselling as contemplated in the Default Regulations will be provided by the Fund through the formal means of communication detailed in the Fund's Communication Strategy.

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The following audiences have been identified:

7.5.1 Member Audiences

Audience	Defined Benefit	Defined Contribution
Working members		
New members aged 20 – 30		✓
New members aged 30 – 45		✓
Members < aged 41*		✓
Members > aged 41* < retirement age	✓	✓
Members considering resignation	✓	✓
Members considering retirement (including early)	✓	✓
Members about to retire	✓	✓
Members at the point of resignation, retrenchment or dismissal	✓	✓
Members considering withdrawals from their savings pots	✓	✓
Members at the point of transferring into / out of the Fund	✓	✓
Members in receipt of disability income		✓
Pensioners		
Principal pensioners: Life Annuitants	✓	✓
Principal pensioners: Living Annuitants		✓
Spouse and child pensioners: Life Annuitants	✓	✓
Spouse and child pensioners: Living Annuitants		✓
Deferred pensioners: Paid-up	✓	
Deferred pensioners: On withdrawal	✓	✓
Deferred pensioners: On retirement	✓	✓
Potential beneficiaries of death benefits		
In the case of working members	✓	✓
In the case of pensioners	✓	✓
Surplus entitlements (when applicable)		
Former members	✓	✓

* This lower minimum target age of 41 was set after feedback from members at workshops, as members could still make a very meaningful financial adjustment to their financial provision for retirement from this age onwards.

These audiences should be increasingly segmented to facilitate targeted personalised communication, which is more likely to be read.

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7.5.2 Support/Secondary Audiences

- Employers' stakeholders (Executive and Management Teams, including HR Department staff);
- Fund staff and relevant Fund service providers;
- Trustees and non-Trustee Board Committee members; and
- Employee representatives such as shop stewards and union leadership.

7.6 Key Messages

Key messages are drafted in line with the specific objectives outlined in the Fund's Communication Strategy, but revolve around (but are not limited to) the following issues:

7.6.1 Benefit Structure Issues

- Benefit calculations, entitlements and options (on retrenchment, retirement, death, disability, Savings Pot withdrawal and withdrawal);
- Benefit projections and annual benefit statements (including Replacement Ratio Projections for DC working members under the age of 55);
- Method and timing of benefit payments;
- Pension increases; and
- Any changes relating to the above.

7.6.2 Management Issues

- Details of the Board and Board Committees;
- Name and contact details of Fund Management;
- Details of relevant Fund policies and governance documents (such as Board Charter, Privacy Policy, Communication Policy, Investment Policy Statement, Disinvestment Practice Note, Pension Increase Policy, Annuity Strategy Document and Benefit Counselling Practice Note);
- Details of the Trustee election process, as and when required; and
- The process for submitting a query or complaint to the Fund, the Pension Funds Adjudicator and/or the FSCA.

7.6.3 Regulatory and Governance Issues

- The registered Rules and Schedule of Rulings of the Fund and amendments thereto;
- Changes to regulatory requirements or issues raised by the Authority;
- Any Pension Funds Adjudicator's (PFA) or FSCA determinations against the Fund;
- All deviations from or non-compliance with policy, rules, acts, other relevant legislation and regulations; and
- Leading governance practices and principles, for example King IV and PF130.

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7.6.4 Funding Issues

- Summarised version of the Annual Financial Statements and access to the complete set of the Annual Financial Statements;
- Funding level (including the results of the triennial statutory actuarial valuations) of the Fund and other relevant financial ratios;
- Administration costs incurred by the Fund;
- Any changes to the adopted investment strategies;
- The performance of the Fund's investments against benchmarks and return objectives; and
- The sustainability of draw-down rates in respect of living annuitants.

7.6.5 Member Investment Issues

- Details of the Fund's Investment Policy Statement, Annuity Strategy Document and Disinvestment Practice Note;
- Details of the investment options available to members;
- Allocation of contributions to retirement funding, risk benefit premiums and administration costs;
- Underlying asset classes, such as equities (shares), bonds, cash and offshore, as well as changes to the asset allocations to such in the life-stage portfolios;
- The underlying risk associated with investments (and especially the investment and longevity risks carried by DC members);
- Investment management costs and fees;
- Investment performance benchmarks;
- The concept of the Replacement Ratio for DC members and the individual member's responsibilities in this regard;
- Allowance for Additional Voluntary Contributions (AVCs) to retirement savings in terms of prevailing tax legislation; and
- Reminders of the need for members to review their investment choices periodically and to encourage members to make additional provision for a financially secure retirement.

7.6.6 General

- The role of the FSCA and its contact details (website and physical address);
- The process to lodge a complaint with the PFA or a query with the FSCA; and
- Any other information that the Trustees consider appropriate or relevant.

7.7 Communication Media and Touchpoints

Very few audiences receive exclusive communication. Instead, key messages relevant to the various audiences will often overlap.

The specific communication media and touchpoints employed by the Fund are covered in detail in the Fund's Communication Strategy, which is compiled by Fund Management and approved on the recommendation of the Committee by the Board annually.

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The following is an overview of communication media to be used:

7.7.1 Member Communication (For Working Members and Pensioners)

As a minimum, the following forms of member communication will be used:

- New member entrant letter confirming membership;
- Deferred certificate to members who defer their retirement benefits in the Fund by choice or by default;
- New pensioner letter confirming the type of in-fund pension purchased and details of the payment of such;
- Up-to-date member guides (DB and DC member guides, Death Benefit Booklets and Pensioner Information Booklet);
- Annual benefit statements;
- Online access to monthly updates available to DC working members, in-Fund DC living annuitants and DC Deferred Pensioners who have registered for this facility, as well as to other members on request;
- Annual Replacement Ratio Projections for DC working members under the age of 55;
- Online life-stage investment portfolios fact sheets for DC working members, DC Deferred Pensioners and in-Fund DC living annuitants, indicating the make-up of these portfolios, their associated costs, their monthly performance and how members can switch between portfolios if they so wish;
- Monthly statements to in-fund DC living annuitants, reflecting their capital balances and other relevant information;
- Annual living annuity anniversary letters to in-Fund DC living annuitants to review and advise the Fund of changes to their draw down value or percentage;
- Annual Review Report on the Fund's activities for a specific reporting period, including any Rule amendments;
- Confirmation of member instructions, such as change in life-stage investment portfolio and banking instruction; and
- Pensioner specific correspondence, such as Certificate of Existence, pension increase communication and payslips.

In addition, the following forms of member communication are also used:

- Regular newsletters for working members (Fund Focus) and pensioners (Pensioner Focus);
- Regular electronic publication (Newsflashes) for all members with email addresses;
- Working member information sessions;
- Pensioner information sessions at locations where there is a concentration of Fund pensioners (on request);
- Pre-retirement workshops and MS Teams meetings for members approaching retirement;
- A comprehensive, interactive and up-to-date website containing all relevant Fund and other information;

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- A document sent to all pending retirees, setting out those matters to be considered before choosing an annuity option; and
- Attempts to contact members telephonically (benefits counselling) before their withdrawal or retirement from the Fund.

Additional communication media and touchpoints may be added to the existing range of media as identified and approved by the Committee.

7.7.2 Support/Secondary Audience Communication

Various support audiences play an invaluable role in disseminating Fund information, dealing with ad-hoc queries as a first point of call and allowing the Fund to 'piggy-back' on their forums.

These support audiences will therefore receive the following communication:

Employers' Stakeholders (Executive and Management Teams, including HR Staff)

- Appropriate training and/or briefing sessions on new developments, as and when required.

Fund Staff and Relevant Service Providers

- Appropriate training and/or briefing sessions in order to keep staff and the relevant service providers updated on matters such as the Rules of the Fund, legislative and process changes and industry developments.

Trustees (including non-Trustee Board Committee members)

- Induction training for newly appointed or elected Trustees, including non-Trustee Board Committee members, to provide them with the basic information needed to help them fulfil their role as Trustees and/or Board Committee members;
- Trustee education on an ongoing and structured basis, in accordance with the Fund's Trustee Education Policy and Strategy, to ensure that Trustees and Non-Trustee Board Committee members not only fulfil their fiduciary duties but also remain abreast of relevant developments to be able to deal with basic queries from members or refer such to the Fund Management should they not be a position to respond;
- Ongoing input of an educational nature provided at Board/Board Committee meetings and other events of the Board;
- Literature of interest circulated to Trustees and/or Board Committees;
- A dedicated Trustee website containing information relevant to the ongoing affairs of the Fund; and
- Comprehensive agenda packs that are distributed timeously to the Trustees and Board Committee members before Board and Board Committee meetings.

Employee Representatives (Shop Stewards Forum and Union leadership)

- Appropriate training and/or briefing sessions on new developments, as and when required.

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7.8 Evaluation of Fund Communication

To evaluate the success of Fund communication objectively and accurately, desired and measurable outcomes (objectives) provided for in the Fund's Communication Strategy should be assessed for the various forms of communication where this is practical.

Evaluation of any given form of communication is achieved through feedback mechanisms built into the specific media distributed and feedback received during group sessions. Surveys are conducted with samples of members to assist in the evaluation of Fund communication and to ensure that the Board's commitment to TMF is understood by members.

In addition to this, an annual communication review to assess the successes and failures of the Fund's Communication Strategy will be conducted by Fund Management, in consultation with the Fund's Communication Consultant, and the results of this review will be reported to the Committee.

Trustees and non-Trustee Board Committee members will also be requested to provide input on this policy and the Fund's Communication Strategy, as part of the Fund's annual Board and Board Committee Self-Appraisals, the result of which will be considered by Fund Management and the Committee when reviewing such.

7.9 Management of Communication

Fund Management will work closely with the Committee, which will meet or review documentation and communication material as and when required to ensure the appropriate application of this policy.

Where relevant, the Fund's Communication Strategy will specify the role players, their responsibilities and key dates for distribution or publication of communication, as appropriate.

Minutes of Committee meetings will be taken and distributed within a reasonable period following a meeting and will be placed on the secured Trustee website. All communication deliverables will be listed in the Fund's Communication Strategy document prepared by Fund Management and approved by the Board on the Committee's recommendation.

7.10 Protection of Personal Information

All communication that contains personal information and is emailed or distributed via other electronic means to members must be password protected to ensure compliance with legislation, as well as protecting member's personal information.

7.11 Communication Budget

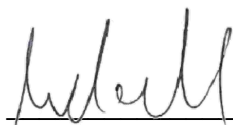
Fund Management is responsible for compiling a communication budget in line with the Fund's Communication Strategy and for submitting such to the Committee for their consideration.

This budget, which is subject to final approval by the Board, will be reviewed annually as part of the review of the Fund's Communication Strategy and will be actively managed and accounted for by Fund Management on a regular basis during the course of each financial year.

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8. AUTHORISATION AND APPROVAL

Approved by the Board of Trustees.



CW Coltman
Chairperson

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Revision no	Description	Date Reviewed	Date Approved	Minute No.
001	Policy created	16 May 2011	23 June 2011	4.5
002	Annual review	12 June 2012	21 September 2012	44.12.1
003	Annual review	February 2013	20 March 2013	11.13
004	Annual review	February 2014	27 March 2014	10.14
005	Annual review	February 2015	26 March 2015	13.15.1
006	Annual review	February 2016	31 March 2016	11.16.2
007	Annual review	February 2017	30 March 2017	10.17.3
008	Annual review	February 2018	27 March 2018	9.18
009	Annual review	13 March 2019	27 March 2019	17.19
010	Annual review	5 March 2020	26 March 2020	8.20.2.1
011	Annual review	4 March 2021	24 March 2021	19.22.2.1
012	Biennial review	9 March 2023	4 April 2023	13.23.2.2
013	Biennial review	13 March 2025	10 April 2025	06.25.3.2