



# Quilter plc Public Affairs Standard

## Parent Policy

Quilter Corporate Communications Policy

## Quilter Standard Owner

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## 1. Introduction

This is the Quilter Public Affairs Standard (the “Standard”).

This Standard supports Quilter’s approach to implementing and maintaining an adequate and effective risk management and control framework which, alongside Quilter Policies and Standards, contributes to the system of internal control set out within Quilter’s Group Governance Manual (‘GGM’). This Standard should be read in conjunction with its respective Parent Policy and other associated documentation as set out in Appendix A.

### 1.1 Standard Objectives and Scope

The purpose of this Standard is to set out specific requirements to be applied across Quilter. Compliance is expected, however, standards do not need to be attested to as part of the Quilter Policy Framework.

The Standard is applicable across Quilter plc, including all Group Functions and Businesses as defined within the GGM and their subsidiaries.

### 1.2 Standard Owner and Review

This Standard is the responsibility of the Quilter Standard Owner. If appropriate, a member of each Business’ senior management, who has sufficient standing, can be appointed as the Standard owner for that Business (‘Business Standard Owner’). This Standard is subject to review by the Quilter Standard Owner at least annually and more frequently in the event of a significant change impacting this Standard.

## 2. Standard Requirements

The requirements set out in this Standard are minimum requirements (unless they are written in such a way that they can be applied proportionately) and are aligned to the Quilter Corporate Communication Policy requirements as detailed in the Quilter Public Affairs Standard Guidance set out in Appendix A. Where local legal or regulatory requirements are more onerous, affected Businesses must meet the local requirements in addition to meeting the Quilter requirements set out below:

Req. Ref.	Requirement
2.1	All public affairs communications or activity must comply with the principles set out in part 4 of Appendix A.
2.2	All employees of the Quilter Group and its Businesses must adhere to the Quilter Public Affairs Standard.
2.3	All Quilter Group media spokespeople must adhere to rules set out in the Quilter Public Affairs Standard.
2.4	All public affairs communications must comply with applicable regulatory requirements, the Quilter Group operating model and align with the Group’s strategy and communication principles.
2.5	All government relations and public affairs activity relating to the Quilter Group or a Business must be approved by a senior member of the Corporate Affairs team in advance of the activity.

2.6	All face-to-face government relations and public affairs meetings must be undertaken by approved Quilter Group spokespersons and must take place in the company of a member of the Corporate Affairs team.
2.7	A record of all government relations and public affairs activity must be maintained for time periods required by Corporate Affairs.
2.8	Only employees who have been approved as Quilter media spokespeople are permitted to communicate with government and/or politicians for the purposes of public affairs on behalf of the Group or a Business.

### 3. Governance

The Quilter Policy Framework sets out the governance requirements applicable to Quilter Standards. Businesses are responsible for co-ordinating local governance in an appropriate and proportionate manner.

### 4. Reporting, Escalation and Breaches

Breaches of this Standard should be reported to the Quilter Standard Owner and Quilter Policy Specialist in accordance with the risk reporting and escalation requirements set out in Quilter's Enterprise Risk Management Policy and Risk & Event Escalation Standard.

## Appendix A: Supporting and Associated Documentation

This Standard should be read in conjunction with Parent Policy and Quilter Public Affairs Standard Guidance as set out below. In addition, further documentation may exist at a Business level; please refer to an appropriate Business Standard Owner.

### Quilter Public Affairs Standard Guidance

#### **1. Public Affairs Definitions & Remit**

- 1.1 'Public Affairs' means activities which are carried out for the purpose of raising awareness of a particular public policy issue; and/or activities carried out for the purpose of influencing the Government, Parliamentarians or any other policy organisation.
- 1.2 'The Government' includes Ministers; Officials; and members of staff from Central Government; Devolved Government; and Local Government.
- 1.3 Quilter's Public Affairs activities will typically be limited to public policy matters arising from the UK Government and UK legislation. However, Public Affairs activities may include public policy matters outside the UK if it is deemed appropriate by the Corporate Affairs team.
- 1.4 Quilter's Public Affairs activities will typically not consider matters which originate from regulators including the FCA, PRA or TPR, unless there is sufficient reason to do so. If it is deemed necessary to conduct activities relating to regulatory policy, then the Risk and Compliance teams will be engaged as required.

#### **2. Objectives for Quilter's Public Affairs Function**

- 2.1 To monitor and analyse relevant public policy developments from the Government, Parliament, trade associations and other policy organisations, and to work with relevant individuals/teams to report these to Quilter and to formulate Quilter's response to these developments.
- 2.2 To maintain and develop Quilter's profile and reputation in Government, Parliament and among other policy makers.
- 2.3 To develop Quilter's reputation for expert thought leadership on public policy issues, and to develop and maintain Quilter's Policy Manifesto periodically.
- 2.4 To manage and develop Quilter's engagement with trade associations, and to maximise the value derived from Quilter's trade association memberships.
- 2.5 To identify public policy and legislative risks and raise these risks to relevant senior leadership, Risk teams and ExCo members where appropriate.

#### **3. Requirements of the Quilter Corporate Communications Policy**

- 3.1 Responsibility for corporate communications must be assigned and structures must be in place to manage internal and external corporate communications in the Quilter Group and its Businesses.

- 3.2 A corporate communications strategy aligned to the business strategy must be in place and approved for managing external and internal corporate communications across the Quilter Group and its Businesses.
- 3.3 No material corporate or market sensitive information is to be released to the external market or internal audiences without prior approval from relevant signatories at Quilter Group and/or within the Businesses.
- 3.4 Processes for managing corporate communication risk must be fully documented especially where such processes relate to sensitive financial information.
- 3.5 If an employee identifies an issue which they reasonably believe has the potential to have a negative impact on the reputation of Quilter, they have a responsibility to advise their line manager; the Head of External Communications; the Head of Investor Relations as appropriate, in accordance with Quilter Group's escalation protocol. Referral the Group CRO must be made where there is an identified Group reputational impact. Any communications developed in response or mitigation must be approved by the Group CRO where there are regulatory implications.
- 3.6 Each Business must ensure that all internal and external corporate communications have been agreed in advance and signed off by the Head of External Communications, Head of Internal Communications and appropriate Business representative.
- 3.7 Any person who communicates on behalf of Quilter Group or its Businesses to an internal or external audience must act responsibly, and is required to treat in strictest confidence, any information which may negatively impact Group's reputation or may be price sensitive or proprietary to Quilter Group.
- 3.8 Communication external to Quilter Group or a Business ("external communication") must only be performed by an authorised external spokesperson for public relations or public affairs.
- 3.9 All internal and external corporate communications must meet local regulatory requirements, including Market Abuse Regulations ("MAR") requirements.
- 3.10 Detailed recording keeping, version control and retention of information relevant to all corporate communications must be undertaken by all Corporate Affairs & Communications team representatives.
- 3.11 All employees of the Quilter Group and its Businesses must adhere to the Quilter Group Social Media Guidelines.
- 3.12 Third party communications agencies must not be appointed without approval by the Head of Investor Relations.
- 3.13 All employees of the Quilter Group and its Businesses must adhere to the Quilter Public Affairs Standard.

#### **4. Principles for Quilter Public Affairs Engagement**

- 4.1 Transparency: Quilter must be transparent about the principles and objectives guiding its public affairs activities. Quilter must be open, honest and transparent in dealings with government officials and/or parliamentarians.
- 4.2 Oversight: The Head of External Communications is accountable to the ExCo for setting the principles, objectives and scope of Quilter's public affairs activities and reviewing these regularly.

- 4.3 Legitimate: Quilter will only conduct public affairs activities if it has the requisite expertise; the topic is relevant to our business; has the potential to benefit customers or wider society; has a positive impact on the long-term savings landscape; or enables good customer outcomes.
- 4.4 Evidence-based: Quilter's public affairs activities must be based on qualitative or quantitative analysis of a public policy issue, and must not be guided by opinion. Quilter must not make misleading or exaggerated claims in the course of its public affairs activities.
- 4.5 Consistent: All of Quilter's public affairs activities must demonstrate consistency across the Group.

## **5. Governance**

- 5.1 General oversight of public affairs activities is provided by the Head of External Communications.

## **6. Trade Associations**

- 6.1 Quilter is a member of several trade associations and industry bodies and the relationship with these is managed by the Corporate Affairs Team.
- 6.2 Decisions relating to membership of trade and member organisations must be approved by the ExCo with input from the Head of External Communications.

## **7. External Agencies**

- 7.1 Should Quilter use the services of an external public affairs agency the appointment must be approved by the Head of External Communications in advance.

## **8. Political Expenditure**

- 8.1 Quilter is a politically neutral organisation and does not engage in party political campaigning or make party political donations.
- 8.2 Quilter does, however, seek authority from its shareholders, by way of a resolution passed at the Group's Annual General Meeting, to authorise political donations or political expenditure up to an aggregate amount of £50,000. This is a precautionary measure to ensure that Quilter does not inadvertently breach the Companies Act 2006 through the undertaking of routine activities, which may be interpreted as political donations or political expenditure under the Act.
- 8.3 Should the Company become aware that it has inadvertently made any political donations or incurred any political expenditure, this will be disclosed in the Company's next Annual Report and Accounts.
- 8.4 Should the Company become aware of an inadvertent political donation being made, then the CFO and Company Secretary must be immediately informed.

## **9. Employment of Current and Former Politicians**

- 9.1 For the purposes of Section 9, 'politician' means any: Member of Parliament; Member of the House of Lords; Member of the European Parliament; Member of the Scottish Parliament, Senedd Cymru, Northern Ireland Assembly and the London Assembly; and any legislative member in other jurisdictions where Quilter operates.
- 9.2 Quilter will not employ any current politician to conduct public affairs activities in any capacity.

- 9.3 Quilter will not make any award or payment in money or in kind to any current politician for the provision of public affairs activities.
- 9.4 If Quilter employs any current politician in any capacity other than public affairs, then Quilter must not make use of any privileged information made available or made known to Quilter as a result of the employees position in government or parliament.
- 9.5 Quilter may employ any former politician to conduct public affairs activities, but this appointment must be approved by the Head of External Communications.
- 9.6 If Quilter employs any former UK Government Minister or senior official within two years of leaving office, the appointment must be approved by the Advisory Committee on Business Appointments (ACOBA), and the employee must not lobby the government for two years after leaving office, as stated in the Ministerial Code.
- 9.7 Any employment of a current or former politician requires the approval of the Group CEO or Group CFO prior to appointment.