

## AREAS FOR IMPROVEMENT AND RECOMMENDATIONS BASED ON THE KING IV CODE™ ASSESSMENT

PN to update  
 AR&CC/Board  
 Executives to action  
 Comments

POLICIES	PRINCIPLE #	RECOMMENDED PRACTICE	CLIENT COMMENT	SUPPORTING DOCUMENTATION		RECOMMENDATIONS				
	Pr 1 RP 1	Individual and collective cultivation and exhibition of integrity:								
	Pr 1 RP 1.a.i	- acting in good faith and best interests	Yes, in practice. There has been no incident displaying anything to the contrary.	Ethics and Code of Conduct Policy	Y	N	N	N	This should be part of the formal values statement of the organisation.	have addressed in the Integrated Report - can look to expand for FY2020
	Pr 1 RP 1.a.ii	- avoiding conflicts of interest	Yes. Any potential conflicts of interest are disclosed at the commencement of each Board meeting under a standing agenda item.	Board Agenda; Conflicts of Interest Policy; Trading, Communications and Confidentiality Policy	Y	N	N	N	This should be part of the formal values statement of the organisation.	have addressed in the Integrated Report - can look to expand for FY2020
	Pr 1 RP 1.a.ii	- disclosing and managing any conflict of interest	Yes. Any potential conflicts of interest are disclosed at the commencement of each Board meeting under a standing agenda item.	Board Agenda; Conflicts of Interest Policy; Annual Declaration of Interests; Trading, Communications and Confidentiality Policy	Y	N	N	N	This should be part of the formal values statement of the organisation.	have addressed in the Integrated Report - can look to expand for FY2020
	Pr 1 RP 1.a.iii	- acting ethically beyond legal compliance	Yes. There has been no incident displaying anything to the contrary.		N	Y	N	N	This should be part of the formal values statement of the organisation.	have addressed in the Integrated Report - can look to expand for FY2020
	Pr 1 RP 1.a.iv	- setting the tone for an ethical culture	Yes, in practice There has been no incident displaying anything to the contrary.		N	Y	N	N	This should be part of the formal values statement of the organisation.	have addressed in the Integrated Report - can look to expand for FY2020
	Pr 1 RP 1	Individual and collective cultivation and exhibition of competence:								
	Pr 1 RP 1.b.i	- ensuring sufficient working knowledge of the organisation	Yes, in practice.		N	Y	N	N	This should be part of the formal values statement of the organisation.	have addressed in the Integrated Report - can look to expand for FY2020
	Pr 1 RP 1.b.ii	- acting with due care, skill and diligence	Yes, in practice.		N	Y	N	N	This should be part of the formal values statement of the organisation.	have addressed in the Integrated Report - can look to expand for FY2020
	Pr 1 RP 1.b.ii	- taking diligent steps to become informed about matters for decision	Yes, in practice.		N	Y	N	N	This should be part of the formal values statement of the organisation.	have addressed in the Integrated Report - can look to expand for FY2020
	Pr 1 RP 1.b.iii	- developing competence to lead effectively	Yes, in practice.		N	Y	N	N	This should be part of the formal values statement of the organisation.	have addressed in the Integrated Report - can look to expand for FY2020
	Pr 1 RP 1	Individual and collective cultivation and exhibition of responsibility:								
	Pr 1 RP 1.c.i	- steering and setting direction	Yes, in practice.		N	Y	N	N	This should be part of the formal values statement of the organisation.	have addressed in the Integrated Report - can look to expand for FY2020
	Pr 1 RP 1.c.i	- approving policy and planning	Yes, in practice.	Board Minutes	N	Y	N	N	This should be part of the formal values statement of the organisation.	have addressed in the Integrated Report - can look to expand for FY2020
	Pr 1 RP 1.c.i	- overseeing/monitoring execution by management	Yes, in practice.	Quarterly Reports	N	Y	N	N	This should be part of the formal values statement of the organisation.	have addressed in the Integrated Report - can look to expand for FY2020
	Pr 1 RP 1.c.i	- ensuring accountability for organisational performance	Yes, in practice.	Performance Reviews	N	Y	N	N	This should be part of the formal values statement of the organisation.	have addressed in the Integrated Report - can look to expand for FY2020
	Pr 1 RP 1.c.ii	- exercising courage in risks and opportunities	Yes, in practice.		N	Y	N	N	This should be part of the formal values statement of the organisation.	have addressed in the Integrated Report - can look to expand for FY2020
	Pr 1 RP 1.c.iii	- anticipating, preventing/ameliorating the negative outcomes of activities	Yes.	Board Minutes	N	Y	N	N	This should be part of the formal values statement of the organisation.	have addressed in the Integrated Report - can look to expand for FY2020
	Pr 1 RP 1.c.iv	- attending meetings	Yes.	Attendance Registers	N	Y	N	N	This should be part of the formal values statement of the organisation.	have addressed in the Integrated Report - can look to expand for FY2020
	Pr 1 RP 1.c.iv	- preparing for meetings	Yes.	Board Minutes	N	Y	N	N	This should be part of the formal values statement of the organisation.	have addressed in the Integrated Report - can look to expand for FY2020
	Pr 1 RP 1	Individual and collective cultivation and exhibition of accountability:								
	Pr 1 RP 1.d	- willing to answer for the execution of responsibilities (also those delegated)	Yes.	Performance Reviews	Y	N	N	N	This should be part of the formal values statement of the organisation.	have addressed in the Integrated Report - can look to expand for FY2020
	Pr 1 RP 1	Individual and collective cultivation and exhibition of fairness:								
	Pr 1 RP 1.e.i	- adopting a stakeholder-inclusive approach	Yes, in practice.	Intergated Annual Report	N	Y	N	N	This should be part of the formal values statement of the organisation.	have addressed in the Integrated Report - can look to expand for FY2020
	Pr 1 RP 1.e.ii	- not adversely affecting the natural environment, society or future generations	Yes, in practice. An annual report is published.	Intergated Annual Report	N	Y	N	N	This should be part of the formal values statement of the organisation.	have addressed in the Integrated Report - can look to expand for FY2020
	Pr 1 RP 1	Individual and collective cultivation and exhibition of transparency:								
	Pr 1 RP 1.f	- exercising governance role and responsibilities transparently	Yes, in practice.	King III disclosures; compliance with JSE Listing Requirements	N	Y	N	N	This should be part of the formal values statement of the organisation.	have addressed in the Integrated Report - can look to expand for FY2020
	Pr 1 RP 2	Governing body embodies the above characteristics:								
	Pr 1 RP 2	- to offer effective leadership	Yes, in practice.		N	Y	N	N	This should be part of the formal values statement of the organisation. The Board evalauaton should require specific replies to statements relating to the collective and individual exhibition of integrity, competence, responsibility, accountability and transparency	address in board evaluation
	Pr 1 RP 2	- to achieve strategic objectives over time	Yes, in practice.		N	Y	N	N	This should be part of the formal values statement of the organisation. The Board evalauaton should require specific replies to statements relating to the collective and individual exhibition of integrity, competence, responsibility, accountability and transparency	address in board evaluation
	Pr 1 RP 2	- to achieve positive outcomes over time	Yes, in practice.		N	Y	N	N	This should be part of the formal values statement of the organisation. The Board evalauaton should require specific replies to statements relating to the collective and individual exhibition of integrity, competence, responsibility, accountability and transparency	address in board evaluation
	Pr 1 RP 3	Holding the governing body and its members to account for ethical and effective leadership:								
	Pr 1 RP 3	- implemented arrangements such as codes of conduct, performance reviews, etc	Yes.	Policies; Performance Reviews	Y	N	N	N	This should be part of the formal values statement of the organisation.	reviewig the policy/codes & will disclose in Integrated Report
	Pr 1 RP 3	- disclosed the arrangements	Yes. The Board evaluation process is disclosed as well as compliance with legislation, the King Code and JSE Listing Requirements.	Integrated Annual Report	Y	N	N	N	This should be part of the formal values statement of the organisation.	reviewig the policy/codes & will disclose in Integrated Report
	Pr 2 RP 6	Codes of conduct and ethics policies:								
	Pr 2 RP 6.b	- address key ethical risks	Yes, in principle.	Ethics and Code of Conduct Policy; Gifts Policy	N	Y	N	N	These policies should be revised to address key ethical risks.	risk to be included in risk register - annually considered and any key risk into the risk register
	Pr 2 RP 9	Ethical standards:								
	Pr 2 RP 9.a	- used in recruitment, performance evaluation and reward of employees	Yes, in practice.		N	Y	N	N	This should be part of a formal recruitment policy.	refer recruitment policy and refer in there to ethics policy & flow down to DPAM
	Pr 3 RP 11	Direction set for how corporate citizenship should be approached and addressed	Yes, in practice.	Integrated Annual Report	N	Y	N	N	This should be part of the formal values statement of the organisation.	in IAR = acceptable

Pr 3 RP 13	Core purpose and values, strategy and conduct are congruent with being a responsible corporate citizen	Yes, in practice.	Integrated Annual Report	N	Y	N	N	This should be part of the formal values statement of the organisation.	in IAR = acceptable		
Pr 4 RP 2	Formulation and development of short, medium and long-term strategy delegated to management	Yes.	Board Minutes	N	Y	N	N	This should be stated in the delegation of authority document.	update approvals framework		
Pr 5 RP 9	Direction set for how reporting should be approached and conducted	Yes. This is done actively at each Board meeting where management are requested to provide more relevant or additional information for review. The requests are minuted and management comply.	Management Reports; Board Minutes	N	Y	N	N	A reporting standard and reporting framework policy should be drawn up referring to compliance with legislation and regulations, stakeholder expectations and internal standards and practices.	address as part of the governance policy		
Pr 5 RP 10	Management's reporting framework and reporting standards approved	Yes. This is done actively at each Board meeting where management are requested to provide more relevant or additional information for review. The requests are minuted and management comply. Management has also provided the ad hoc or interim reports requested by the governing body.	Management Reports; Board Minutes	N	Y	N	N	A reporting standard and reporting framework policy should be adopted.	approvals framework addresses this but also include in governance policy		
Pr 8 RP 39	Judgement exercised for if and when to delegate to individuals, members or committees	Yes. All compulsory committees are in place. The Investment Committee is elective. The Board has considered its structure and is satisfied with its delegation and committee structure. Some aspects of delegation of authority to individuals may need expanding.	Approvals Framework; Board and Committee Evaluations	N	Y	N	N	The Approvals Framework should be expanded to include a delegation of authority in respect of non-financial matters so that there is clarity on what functions the Board has delegated and what functions it has retained for itself.	update approvals framework		
Pr 8 RP 41	Delegation to individuals or members approved	Yes, in principle although some delegated functions need to be expanded on.	Approvals Framework; Board Minutes; Committee Charters	N	Y	N	N	The Approvals Framework should be expanded to include a delegation of authority in respect of non-financial matters so that there is clarity on what functions the Board has delegated and what functions it has retained for itself.	update approvals framework		
Pr 8 RP 41	Delegation to individuals or members in writing and stating nature/extent of responsibilities, decision-making authority, duration and reporting	Yes, in principle although some delegated functions need to be expanded on.	Board Charter; Committee Charters; Approvals Framework	N	Y	N	N	The Approvals Framework should be expanded to include a delegation of authority in respect of non-financial matters so that there is clarity on what functions the Board has delegated and what functions it has retained for itself.	update approvals framework		
Pr 11 RP 3	Risk policy approved	In part. Risk appetite and tolerance statement to be addressed in upcoming workshop.	Risk Matrix	N	Y	N	N	This is to be addressed and should form part of the risk register.	WIP - policy being drafted		
Pr 12 RP 11	Technology and information policy approved	No.		N	N	Y	N	Technology and information management should be addressed as soon as possible through separate formal policies.	WIP - policy being drafted		
Pr 12 RP 12	Technology and information management delegated to management	Yes, through practice.	Board Minutes; IT Committee Minutes	N	Y	N	N	Technology and information management should be formally delegated to management with clear parameters.	WIP - policy being drafted		
Pr 12 RP 13	Oversight exercised (iro technology and information) resulting in:										
Pr 12 RP 13.a	- integration of people, technologies, information and processes across the organisation	Yes, but information management needs to be further addressed.		N	Y	N	N	Information management should be addressed as soon as possible through a formal policy.	WIP - policy being drafted		
Pr 12 RP 13.b	- integration of technology and information risks into risk management	Yes, but information management needs to be further addressed.	Board Minutes; IT Committee Minutes	N	Y	N	N	Information management should be addressed as soon as possible through a formal policy.	WIP - policy being drafted		
Pr 12 RP 13.g	- obsolete technology and information disposed of responsibly	In part.	Board Minutes	N	Y	N	N	Information management should be addressed as soon as possible through a formal policy.	WIP - policy being drafted		
Pr 12 RP 13.h	- ethical and responsible use of technology and information	In part.	Board Minutes	N	Y	N	N	Information management should be addressed as soon as possible through a formal policy.	WIP - policy being drafted		
Pr 12 RP 13.i	- compliance with relevant laws	In part.	Board Minutes	N	Y	N	N	Information management should be addressed as soon as possible through a formal policy.	WIP - policy being drafted		
Pr 12 RP 15	Governing body has exercised oversight (iro technology) resulting in:										
Pr 12 RP 15.a	- architecture of achievement of strategic and operational objectives enabled	In part.		N	Y	N	N	The Board should exercise oversight to ensure that its technology structure enables its strategic objectives.	WIP - policy being drafted		
Pr 12 RP 15.b	- risks in sourcing technology managed	In part.		N	Y	N	N	The Board should exercise oversight to ensure that its technology structure enables its strategic objectives.	WIP - policy being drafted		
Pr 12 RP 15.c	- responses to developments monitored	In part.		N	Y	N	N	The Board should exercise oversight to ensure that developments in technology are being monitored.	WIP - policy being drafted		
Pr 12 RP 16	Independent assurance on effectiveness of technology and information arrangements considered	No.		N	N	Y	N	The Board should objectively consider and assess the need for independent assurance of technology and information arrangements.	WIP - policy being drafted		
Pr 13 RP 19	Compliance policy approved	Yes, through practice. A policy will be finalised once the corporate action is concluded.		N	Y	N	N	A formal policy should be drawn up and adopted by the Board as soon as possible after the corporate action has been concluded.	address as part of the Governance Policy		
Pr 13 RP 20	Compliance management delegated to management	Yes, through practice.		N	Y	N	N	A formal policy should be drawn up and adopted by the Board.	address as part of the Governance Policy		
Pr 16 RP 2	Stakeholder relationships policy approved	No formal policy, but there is practice. The need for a policy will be assessed once the corporate action has been concluded.		N	Y	N	N	A stakeholder communication policy should be drawn up and adopted by the Board to assist with the delivery of timely, relevant, accurate and honest information to stakeholders.	addressed in IAR & look at approvals framework & include annual review at SETCOM meeting	to be addressed as part of Governance Policy	
Pr 16 RP 3	Stakeholder relationships delegated to management	Yes, through practice.		N	Y	N	N	This should be formally delegated to management with clear parameters.	addressed in IAR & look at approvals framework & include annual review at SETCOM meeting	to be addressed as part of Governance Policy	
Pr 16 RP 4	Oversight exercised (iro Stakeholder relationships):										
Pr 16 RP 4.d	- formal stakeholder engagement processes, including dispute resolution	This is addressed by informal practices and engagements.		N	N	Y	N	This should be addressed through a formal stakeholder communication policy.	addressed in IAR & look at approvals framework & include annual review at SETCOM meeting	to be addressed as part of Governance Policy	
KPIs	Pr 3 RP 14 Management measures and targets:										
Pr 3 RP 14.a	- workplace (employment equity, fair remuneration, employee safety, health, dignity, development, etc)	No.		N	N	Y	N	Management performance measures should contain these non-financial targets.	addressed by the Social & Ethics Committee		
Pr 3 RP 14.b	- economic (economic transformation, prevention, detection/response to fraud/corruption, responsible/transparent tax policy, etc)	No.		N	N	Y	N	Management performance measures should contain these non-financial targets.	addressed by the Social & Ethics Committee		
Pr 3 RP 14.c	- society (public health and safety, consumer protection, community development, protection of human rights, etc)	No.		N	N	Y	N	Management performance measures should contain these non-financial targets.	addressed by the Social & Ethics Committee		
Pr 3 RP 14.d	- environment (pollution, waste disposal, biodiversity, etc)	No.		N	N	Y	N	Management performance measures should contain these non-financial targets.	addressed by the Social & Ethics Committee		
STRATEGY	Pr 4 RP 3 Short, medium and long-term strategy challenged iro:										

	Pr 4 RP 3.c	- extent of dependence of each strategy on the resources and relationships of various forms of capital	Yes. This is done generally at the annual strategy conference and at quarterly Board meetings, although the six forms of capital have not each been considered separately.	Strategy Session; Board Minutes	N	Y	N	N	The short, medium and long strategies of the organisation should be considered in terms of the six forms of capital.	will be brought through at next strategy session
	Pr 4 RP 3.e	- increase, decrease or transformation of the various forms of capital resulting from each strategy	Yes. This is done generally at the annual strategy conference and at quarterly Board meetings, although the six forms of capital have not each been considered separately.	Strategy Conference; Board Minutes	N	Y	N	N	The short, medium and long strategies of the organisation should be considered in terms of the six forms of capital.	will be brought through at next strategy session
	Pr 4 RP 3.f	- interconnectivity and inter-dependence of all of the above	Yes. This is done generally at the annual strategy session and at quarterly Board meetings, although the six forms of capital have not each been considered separately.	Strategy Session; Board Minutes	N	Y	N	N	The short, medium and long strategies of the organisation should be considered in terms of the six forms of capital.	will be brought through at next strategy session
	Pr 4 RP 7	Assessment and response to negative consequences of activities and outputs iro triple context and six capitals	Yes. This is done generally at quarterly Board meetings, although the six forms of capital have not each been considered separately.	Board Minutes	N	Y	N	N	The negative consequences of the activities of the organisation should be assessed in terms of the triple context and the six forms of capital.	will be brought through at next strategy session
	Pr 4 RP 8	Assessment of viability iro the six capitals, solvency and liquidity and going concern	This is assessed by management on a monthly basis and monitored by the Board on a quarterly basis. An assessment against the six capitals is done generally.	Management Reports, Board Minutes	N	Y	N	N	A specific assessment should be carried out against the six forms of capital.	will be brought through at next strategy session
SUCCESSION	Pr 7 RP 13	Succession plan established	Not formally documented or approved pending corporate action.		N	N	Y	N	This should be addressed as soon as possible after the conclusion of the corporate action.	work in progress
	Pr 7 RP 36	The following considered generally (iro chair):			N	N	Y	N		
	Pr 7 RP 37	Succession plan for chair in place	No formal plan. A plan will be finalised once the corporate action has been completed.		N	N	Y	N	This should be addressed as soon as possible after the conclusion of the corporate action.	work in progress
	Pr 10 RP 81	Governing body is satisfied with succession planning for CEO (emergency and long term)	No. The matter is likely to be addressed once the corporate action is concluded.		N	N	Y	N	Succession planning should be addressed once the corporate action is concluded.	work in progress
	Pr 10 RP 88	Governing body is satisfied that:			N	N	Y	N		
	Pr 10 RP 88	- succession planning for management is in place (emergency and long term)	The Board is aware of the need for succession planning and is satisfied that the matter will be addressed once the corporate action is concluded.		N	N	Y	N	This should be addressed as soon as possible once the corporate action has been concluded.	work in progress
	Pr 10 RP 88	- succession planning for management is reviewed periodically	No. The matter will be addressed once the corporate action is concluded.		N	N	Y	N	This should be addressed as soon as possible once the corporate action has been concluded.	work in progress
ADMINISTRATION	Pr 7 RP 18	Non-executive candidates have provided details of commitments and confirmation of availability	No. The relevant documentation is being compiled. In the interim the Nominations Committee monitors and addresses availability and attendance regularly as an agenda item.	Nominations Committee Minutes	N	N	Y	N	The confirmations required should be compiled as part of the formal letter of appointment.	done
	Pr 7 RP 19	Independent investigation of candidate background and qualification before nomination	No. But the Board is satisfied that only individuals with verifiable character references/track records are submitted to the Nominations Committee for consideration.		N	N	Y	N	Independent background checks should be carried out in all circumstances.	done
	Pr 7 RP 21	Formal letter of appointment for each member	No, although a consent to appointment form is signed.	Consent to Appointment	N	Y	N	N	The current consent to appointment should be developed further to encapsulate a formal letter of appointment.	done
	Pr 7 RP 33	Role, responsibilities and term of office of chair documented	No.		N	N	Y	N	A formal document should be drawn up for the Chair in this regard.	yes - Chairman's Charter in place
	Pr 12 RP 14	Oversight exercised (iro information) resulting in:			N	N	Y	N		
	Pr 12 RP 14.b	- architecture of confidentiality, integrity and availability enabled	In part.		N	Y	N	N	This should be addressed by a regular agenda item for Board meetings.	numerous policies
	Pr 12 RP 14.c	- privacy and personal information protected	In part.		N	Y	N	N	This should be addressed by a regular agenda item for Board meetings.	numerous policies
	Pr 12 RP 14.d	- security of information continually monitored	In part.		N	Y	N	N	This should be addressed by a regular agenda item for Board meetings.	numerous policies
	Pr 13 RP 21	Oversight exercised (iro compliance) resulting in:			N	N	Y	N		
	Pr 13 RP 21.b	- a holistic view of how laws, non-binding rules, codes and standards relate to one another	Yes, through practice.	Compliance Report submitted to Board	N	Y	N	N	The Board should address this recommended practice through a dedicated agenda item.	done
	Pr 13 RP 21.c	- regulatory environment is continually monitored	Yes, through practice.	Compliance Report submitted to Board	N	Y	N	N	The Board should address this recommended practice through a dedicated agenda item.	done
	Pr 15 RP 54	CAE is invited to attend executive meetings	No.		N	N	Y	N	The CAE should attend executive meetings.	to be discussed
PRACTICAL MATTERS	Pr 16 RP 4.e	- measurement of the quality of material stakeholder relationships	The quality of relationships is assessed informally and <i>ad hoc</i> .		N	N	Y	N	This should be addressed as an agenda item and, if deemed applicable, a survey.	on agenda & in Integrated Report
	Pr 8 RP 67	Committee (Remuneration) chaired by independent non-executive	No. Although the Committee Charter provides for an independent Chair, the situation is affected by the pending corporate action. The Board has reviewed the objectivity of the Chair and is satisfied that the Chair exercises objective decision-making over the affairs of the Committee.	Committee Charter	N	Y	N	N	The appointment of the Chair to this committee should be reassessed once the corporate action is concluded.	assessed - no corporate action was concluded so Chair remains independent
	Pr 13 RP 22	Independent assurance on effectiveness of compliance management considered	No. The need for independent assurance in this regard will be addressed once the corporate action is concluded.		N	N	Y	N	The Board should objectively consider and assess the need for independent assurance of compliance management.	to be discussed
	Pr 15 RP 42	Combined assurance model effectively covers risks and material matters through:			N	N	Y	N		
	Pr 15 RP 42.b	- specialist functions that deal with risk management and compliance	No.		N	N	Y	N	The organisation needs to objectively assess whether this function is necessary or not.	to be addressed in Risk Policy
	Pr 15 RP 42.e	- other external assurance providers (sustainability/environmental/forensic auditors)	In part.		N	Y	N	N	The organisation needs to objectively assess the extent to which such functions are necessary or not.	to be addressed in Risk Policy
	Pr 15 RP 44	Direction set for how assurance for external reports should be approached and addressed	No, but criteria for the appointment of assurance providers addresses this in part.		N	Y	N	N	The Board needs to agree on the specific standards it will accept for reports in order for assurance to be placed on them.	to be addressed in Risk Policy
COMMITTEE CHARTERS	Pr 8 RP 48	Committee meeting observers do not vote or get fees without governing body and shareholder approval	Yes, in practice.		N	Y	N	N	All Committee Charters should be revised to state this practice.	Board Charter updated & documented in Integrated Report
BOARD CHARTER	Pr 10 RP 93	Governance service is empowered and has authority	Yes. Through practice.		N	Y	N	N	This should be formally recorded in a contract or policy or the Board Charter.	Board Charter updated & documented in Integrated Report
	Pr 10 RP 94	Competence, gravitas and objectivity of the governance service overseen	Yes.	Company Secretary Evaluation	N	Y	N	N	This should be formally recorded in a contract or policy or the Board Charter.	Board Charter updated & documented in Integrated Report

	Pr 10 RP 95	Governing body has primary responsibility for removing governance service	Yes, in practice.		N	Y	N	N	This should be formally recorded in a contract or policy or the Board Charter.	Board Charter updated & documented in Integrated Report	
	Pr 10 RP 96	Governance service has unfettered access to governing body	Yes, in practice.		N	Y	N	N	This should be formally recorded in a contract or policy or the Board Charter.	Board Charter updated & documented in Integrated Report	
	Pr 10 RP 96	Company secretary is not a member of the governing body	Yes, in practice.		N	Y	N	N	This should be formally recorded in a contract or policy or the Board Charter.	Board Charter updated & documented in Integrated Report	
	Pr 10 RP 97	Governance service reports to governing body via chair on statutory duties	Yes, in practice.		N	Y	N	N	This should be formally recorded in a contract or policy or the Board Charter.	Board Charter updated & documented in Integrated Report	
	Pr 10 RP 97	Governance service reports to designated executive on administrative and other duties	Yes, in practice.		N	Y	N	N	This should be formally recorded in a contract or policy or the Board Charter.	Board Charter updated & documented in Integrated Report	
DISCLOSURES	Pr 2 RP 7	Arrangements to familiarise employees and other stakeholders with ethical standards:									
	Pr 2 RP 7.a	- published on the website or other platforms or media	No. To be addressed.		N	N	Y	N	This should be addressed to the recommended practice.	to be discussed	
	Pr 2 RP 7.b	- incorporated by reference in supplier contracts	No. To be addressed.		N	N	Y	N	This should be addressed to the recommended practice.	to be discussed	
	Pr 7 RP 30.f	- period of service on the governing body of each member	No.	Integrated Annual Report	N	N	Y	N	This disclosure should be made in the Integrated Annual Report.	done	
	Pr 7 RP 35	Number of outside professional positions to be held by chair determined	No.		N	N	Y	N	These positions should be disclosed by the Chair and a limit on the number of such outside positions set by the organisation.	to be discussed	
	Pr 10 RP 83	Following disclosed (iro CEO):									
Pr 10 RP 83.a	- notice period and termination conditions	No.			N	N	Y	N	This should be disclosed in the Integrated Annual Report.	include in Integrated Report	
Pr 10 RP 83.c	- whether succession planning is in place	No. The matter is affected by the pending corporate action.			N	N	Y	N	This should be disclosed in the Integrated Annual Report.	not disclosed publicly but is addressed by the Board	
Pr 10 RP 89	Statement of disclosure that delegation of authority framework is clear and effective	No. This will be addressed in the integrated annual report for FYE 2018.			N	N	Y	N	This should be disclosed in the Integrated Annual Report.	included in Integrated Report	
Pr 10 RP 99	Arrangements to access governance service disclosed	No.			N	N	Y	N	This disclosure should be published in the Integrated Annual Report and online.	included in Integrated Report	
Pr 10 RP 99	Effectiveness of access arrangements to governance services disclosed	No.			N	N	Y	N	This disclosure should be published in the Integrated Annual Report and online.	included in Integrated Report	
Pr 14 RP 32.b	- overview of policy, with the following:										
Pr 14 RP 34.b	-- termination payment obligations iro executive management	No. The matter will be addressed in the Remuneration Policy			N	N	Y	N	The extent of this disclosure should be determined for the sake of clarity.	done	
Pr 16 RP 5	Following disclosed (iro stakeholder relationships):										
Pr 16 RP 5.a	- arrangements for managing relationships	No.			N	N	Y	N	This should be disclosed in the Integrated Annual Report.	included in Integrated Report	
Pr 16 RP 5.b	- key areas of focus during reporting period	No.			N	N	Y	N	This should be disclosed in the Integrated Annual Report.	included in Integrated Report	
Pr 16 RP 5.c	- actions to monitor stakeholder management and how outcomes were addressed	No.			N	N	Y	N	This should be disclosed in the Integrated Annual Report.	included in Integrated Report	
Pr 16 RP 5.d	- future areas of focus	No.			N	N	Y	N	This should be disclosed in the Integrated Annual Report.	included in Integrated Report	
RISK	Pr 11 RP 1	Direction on risk governance assessed:									
	Pr 11 RP 4	Following evaluated and agreed:									
	Pr 11 RP 4.b	- risk appetite	In part. Risk appetite and tolerance statement to be addressed in upcoming risk workshop.			N	Y	N	N	This is to be addressed and should form part of the risk register.	risk policy will address
	Pr 11 RP 4.c	- limit of potential loss which can be tolerated	In part. Risk appetite and tolerance statement to be addressed in upcoming risk workshop.			N	Y	N	N	This is to be addressed and should form part of the risk register.	risk policy will address
	Pr 11 RP 5	Risk management delegated to management	In part.			N	Y	N	N	Risk management should be formally delegated to management with clear parameters.	risk policy will address
	Pr 11 RP 6	Risk management oversight exercised iro:									
	Pr 11 RP 6.a	- assessment of risks and opportunities iro triple context and the six capitals	In part. Risk appetite and tolerance statement to be addressed in upcoming risk workshop.			N	Y	N	N	This is to be addressed and should form part of the risk register.	risk policy will address
	Pr 11 RP 6.b	- assessment of potential upside presented by negative risks	In part. Risk appetite and tolerance statement to be addressed in upcoming risk workshop.			N	Y	N	N	This is to be addressed and should form part of the risk register.	risk policy will address
	Pr 11 RP 6.c	- assessment of resources and relationships iro the six capitals	In part. Risk appetite and tolerance statement to be addressed in upcoming risk workshop.			N	Y	N	N	This is to be addressed and should form part of the risk register.	risk policy will address
	Pr 11 RP 6.d	- design and implementation of risk responses	In part. Risk appetite and tolerance statement to be addressed in upcoming risk workshop.			N	Y	N	N	This is to be addressed and should form part of the risk register.	risk policy will address
	Pr 11 RP 6.e	- establishment and implementation of business continuity arrangements	In part. Risk appetite and tolerance statement to be addressed in upcoming risk workshop.			N	Y	N	N	This is to be addressed and should form part of the risk register.	risk policy will address
Pr 11 RP 6.e	- integration and embedding of risk management in the activities and culture	In part. Risk appetite and tolerance statement to be addressed in upcoming risk workshop.			N	Y	N	N	This is to be addressed and should form part of the risk register.	risk policy will address	
Pr 11 RP 9	Following disclosed (iro risk):										
Pr 11 RP 6.b	- risks taken outside of tolerance levels	In part. Risk appetite and tolerance statement to be addressed in upcoming risk workshop.	Integrated Report; Organisation's Website		N	Y	N	N	This is to be addressed once the risk tolerance statement has been adopted by the Board.	risk policy will address	