FirstRand 2009 Global Reporting Initiative (GRI) content index

NOTES:

1. This GRI content index refers to FirstRand Limited's integrated annual report for the financial year ending 30 June 2009 and to the FirstRand Group's divisional sustinability reports for the same period.

2. The content index supplies information in respect of FirstRand Limited's sustainability disclosures, and where necessary makes references to the Group's online divisional sustainability reports (<u>www.firstrandsustain.co.za.</u>).

3. The content index contains all core GRI indicators and all additional indicators deemed to be material and relevant to the FirstRand Group and its stakeholders.

4. Cases were core indicators do not apply to the FirstRand Group's operations during the period under review are maked as 'Not Applicable'.

5. The principle driver for FirstRand's disclosure in respect of sustinanility performance is materiality and relevance to the Group's operations and stakeholders. While the GRI guidelines play and important role in informing the content for the FirstRand Group's sustinability disclosures, this content index is not accompanied by the declaration of a GRI application level.

COMPANY PROFILE

Drafile	Deceminting	Page in FirstRand integrated		0
Profile	Description Statement from the most senior decision-maker of the	report pp 6 - 15	Level Reported	Comments See also <u>www.firstrandsustain.co.za.</u>
1.1	organisation	pp 0 - 13	Reponed	
1.2	Description of key impacts, risks, and opportunities.	p 71	Reported	See also all divisional sustainability reports: 'Sustainability risks and opportunities'
2.1	Name of the organisation.	p 1	Reported	
2.2	Primary brands, products, and/or services.	pp 28 - 48	Reported	
2.3	Operational structure.	p 27	Reported	
2.4	Location of organisation's headquarters.	p 399	Reported	
2.5	Number of countries where the organisation operates.	p 3	Reported	
2.6	Nature of ownership and legal form.	p 27	Reported	
2.7	Markets served (including geographic breakdown, sectors served, and types of customers/beneficiaries).	pp 28 - 48	Reported	See also all divisional sustainability reports: 'Company profile'
2.8	Scale of the reporting organisation	р 1	Reported	
2.9	Significant changes during the reporting period.	рр 13 - 15	Reported	
2.10	Awards received in the reporting period.	p 62	Reported	
3.1 3.2	Reporting period (e.g., fiscal/calendar year).	p -1 Not stated explicitly	Reported	Populatory requirement to report appually
3.2 3.3	Date of most recent previous report (if any). Reporting cycle (annual, biennial, etc.)	Not stated explicitly	Reported	Regulatory requirement to report annually
3.4	Contact point for questions regarding the report or its	p 399	Reported	See also all divisional sustainability reports:
3.5	contents. Process for defining report content.	p 81	Reported	'Contact information' See also all divisional sustainability reports: 'Report
				parameters'
3.6	Boundary of the report.	p 81	Reported	See also all divisional sustainability reports: 'Report parameters'
	State any specific limitations on the scope or boundary of the report (see completeness principle for explanation	p 81	Reported	
3.7	of scope).			
	Basis for reporting on joint ventures, subsidiaries, leased	р 199	Reported	
	facilities, outsourced operations, and other entities that			
2.0	can significantly affect comparability from period to			
3.8 3.9	period and/or between organizations. Data measurement techniques.	p 81	Reported	See also al divisional sustainability reports: 'Report
3.9				parameters'
3.10	Explanation of the effect of any re-statements of information provided in earlier reports, and the reasons for such re-statement (e.g.,mergers/acquisitions, change of base years/periods, nature of business, measurement methods).		Reported	
3.11	,	pp -1; 81	Reported	
-	the scope, boundary, or measurement methods applied in the report.			
3.12	Table identifying the location of the Standard Disclosures in the report.	www.firstrandsustain.co.za	Reported	Reported on web only
3.13	Policy and current practice with regard to seeking external assurance for the report.	р 80	Reported	
4.1	Governance structure of the organisation.	р 49	Reported	
4.2	Indicate whether the Chair of the highest governance body is also an executive officer.	p 52	Reported	
4.3	For organisations that have a unitary board structure, state the number of members of the highest governance body that are independent and/or non-executive members. State how the organisation defines	pp 52; 54	Reported	
	'independent' and 'non-executive'.			
4.4	Mechanisms for shareholders and employees to provide recommendations or direction to the highest governance body.	pp 50; 60	Reported	
4.5	Linkage between compensation for members of the highest governance body, senior managers, and executives (including departure arrangements), and the organisation's performance (including social and environmental performance).	pp 64 - 68	Reported	
4.6		p 57	Reported	
4.7		pp 56; 57	Reported	

4.8	Internally developed statements of mission or values, codes of conduct, and principles relevant to economic, environmental, and social performance and the status of their implementation.	pp 71; 72	Reported	
4.9	Procedures of the highest governance body for overseeing the organisation's identification and management of economic, environmental, and social performance.	p 49	Reported	
4.10	Processes for evaluating the highest governance body's own performance.	pp 55; 56	Reported	
4.11	Explanation of whether and how the precautionary approach or principle is addressed by the organisation.	p 71	Reported	
4.12	Externally developed economic, environmental, and social charters, principles, or other initiatives to which the organisation subscribes or endorses.	p 51	Reported	
4.13	Memberships in associations.	p 51	Reported	
4.14	List of stakeholder groups engaged by the organisation.	p 50	Reported	See also all divisional sustainability reports: 'Management approach and performance indicators - stakeholder engagement'
4.15	Basis for identification and selection of stakeholders with whom to engage.	p 50	Reported	See also all divisional sustainability reports: 'Management approach and performance indicators - stakeholder engagement'
4.16	Approaches to stakeholder engagement	p 50	Reported	See also all divisional sustainability reports: 'Management approach and performance indicators - stakeholder engagement'
4.17	Key topics and concerns that have been raised through stakeholder engagement and responded to.	p 50	Reported	See also all divisional reports: 'Management approach and performance indicators - material issues'

MANAGEMENT APPROACH AND PERFORMANCE INDICATORS

Indicator	Description	Page No.	Reporting Level	Comments
EC1	Economic value generated and distributed.(Core)	pp 51; 82	Reported	
EC2	Financial implications and other risks and opportunities for the organisation's activities due to climate change. (Core)		Not Reported	Research and setting of benchmarks in progress.
EC3	Coverage of the organisation's defined benefit plan obligations. (Core)	p 64	Reported	
EC4	Significant financial assistance received from government. (Core)		Not Reported	Not Applicable
EC6	Policy, practices, and proportion of spending on locally- based suppliers at significant locations of operation. (Core)	рр 63;76	Reported	
EC7	Procedures for local hiring and proportion of senior management hired from the local community at significant locations of operation. (Core)	p 76	Reported	
EC8	Development and impact of infrastructure investments and services provided primarily for public benefit through commercial, in-kind, or pro bono engagement. (Core)	See divisional sustainability reports.	Reported	See Rand Merchant Bank: p 11
EC9	Understanding and describing significant indirect economic impacts, including the extent of impacts. (Additional)	p 51	Reported	
EN1	Materials used by weight or volume. (Core)	See divisional sustainability reports.	Reported	See Momentum: p 21; OUTsurance: p 20
EN2	Percentage of materials used that are recycled input materials. (Core)	See divisional sustainability reports.	Reported	See Momentum: p 21; OUTsurance: p 20
EN3	Direct energy consumption by primary energy source. (Core)	p 72	Reported	
EN4	Indirect energy consumption by primary source. (Core)		Not Reported	Negligible
EN5	Energy saved due to conservation and efficiency improvements. (Additional)	pp 1; 72; 73	Reported	
EN6	Initiatives to provide energy-efficient or renewable energy based products and services, and reductions in energy requirements as a result of these initiatives. (Additional)	pp 72; 73	Reported	
EN7	Initiatives to reduce indirect energy consumption and reductions achieved. (Additional)	рр 72; 73	Reported	
EN8	Total water withdrawal by source. (Core)	See divisional sustainability reports.	Reported	See First National Bank: p 22
EN11	Location and size of land owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas. (Core)		Not Reported	Not Applicable
EN12	Description of significant impacts of activities, products, and services on biodiversity in protected areas and areas of high biodiversity value outside protected areas. (Core)		Not Reported	Not Applicable
EN16	Total direct and indirect greenhouse gas emissions by weight. (Core)	p 72	Reported	
EN17	Other relevant indirect greenhouse gas emissions by weight. (Core)		Not Reported	Not Applicable
EN18	Initiatives to reduce greenhouse gas emissions and reductions achieved. (Additional)	p 72	Reported	
EN19	Emissions of ozone-depleting substances by weight. (Core)		Not Reported	Not Applicable

EN20	NOx, SOx, and other significant air emissions by type and weight. (Core)		Not Reported	Not Applicable
EN21	Total water discharge by quality and destination. (Core)		Not Reported	Not Applicable
EN22	Total weight of waste by type and disposal method. (Core)	See divisional sustainability reports.	Not Reported	See First National Bank: p 22; Rand Merchant Bank: p 17; WesBank: p 17; Momentum: p 21; OUTsurance p 20
EN23	Total number and volume of significant spills. (Core)		Not Reported	Not Applicable
EN26	Initiatives to mitigate environmental impacts of products and services, and extent of impact mitigation. (Core)	р 73	Reported	
EN27	Percentage of products sold and their packaging materials that are reclaimed by category. (Core)		Not Reported	Not Applicable
EN28	Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with environmental laws and regulations. (Core)		Not Reported	Not Applicable
EN30	Total environmental protection expenditures and investments by type. (Additional)	p 78	Reported	
_A1	Total workforce by employment type, employment contract, and region. (Core)	p 75	Reported	
_A2	Total number and rate of employee turnover by age group, gender, and region. (Core)	р 58	Reported	
_A4	Percentage of employees covered by collective bargaining agreements. (Core)	р 60	Reported	
_A5	Minimum notice periods) regarding significant operational changes, including whether it is specified in collective agreements. (Core)		Not Reported	Not Applicable
_A6	Percentage of total workforce represented in formal joint management-worker health and safety committees that help monitor and advise on occupational health and safety programs. (Additional)	рр 59; 60	Reported	
_A7	Rates of injury, occupational diseases, lost days, and absenteeism, and number of work-related fatalities by region. (Core)	See divisional sustainability reports.	Reported	See First National Bank: p 14; Rand Merchant Bank: p 8; WesBank: p 8; OUTsurance p 10
_A8	Education, training, counselling, prevention, and risk- control programs in place to assist workforce members, their families, or community members regarding serious diseases. (Core)	р 60	Reported	
_A10	Average hours of training per year per employee by	р 59	Reported	
_A13	employee category. (Core) Composition of governance bodies and breakdown of	pp 52; 75	Reported	
	employees per category according to gender, age group, minority group membership, and other indicators of diversity. (Core)			
LA14	Ratio of basic salary of men to women by employee category. (Core)		Not Reported	Consolidated data measurement under development
HR1	Percentage and total number of significant investment agreements that include human rights clauses or that have undergone human rights screening. (Core)	р 73	Reported	
HR2	Percentage of significant suppliers and contractors that have undergone screening on human rights and actions taken. (Core)	рр 63; 76	Reported	
HR4	Total number of incidents of discrimination and actions taken. (Core)		Not Reported	Not Applicable
HR5	Operations identified in which the right to exercise freedom of association and collective bargaining may be at significant risk, and actions taken to support these rights. (Core)		Not Reported	Not Applicable
HR6	Operations identified as having significant risk for incidents of child labour, and measures taken to contribute to the elimination of child labour. (Core)		Not Reported	Not Applicable
HR7	Operations identified as having significant risk for incidents of forced or compulsory labour, and measures to contribute to the elimination of forced or compulsory labour. (Core)		Not Reported	Not Applicable
601	Nature, scope, and effectiveness of any programs and practices that assess and manage the impacts of operations on communities, including entering, operating, and exiting. (Core)	р 73	Reported	
SO2	Percentage and total number of business units analysed for risks related to corruption. (Core)	p 60	Reported	
SO3	Percentage of employees trained in organisation's anti- corruption policies and procedures. (Core)	p 60	Reported	
504	Actions taken in response to incidents of corruption. (Core)		Not Reported	Not Applicable
SO5	Public policy positions and participation in public policy development and lobbying. (Core)	pp 50; 51	Reported	
SO6	Total value of financial and in-kind contributions to political parties, politicians, and related institutions by country. (Additional)		Not Reported	Not Applicable
SO8	Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with laws and regulations. (Core)		Not Reported	Not Applicable

PR1	Life cycle stages in which health and safety impacts of products and services are assessed for improvement, and percentage of significant products and services categories subject to such procedures. (Core)		Not Reported	Not Applicable
PR3	Type of product and service information required by procedures, and percentage of significant products and services subject to such information requirements. (Core)	p 60	Reported	See also divisional sustainability reports - First National Bank: pp 15;16; FNB Africa: pp 16;17; WesBank: p 12; Momentum: p 14; OUTsurance p 16
PR4	Total number of incidents of non-compliance with regulations and voluntary codes concerning product and service information and labelling, by type of outcomes. (Additional)		Not Reported	Not Applicable
PR5	Practices related to customer satisfaction, including results of surveys measuring customer satisfaction. (Additional)	pp 60; 61	Reported	See also divisional sustainability reports - First National Bank: p 15; FNB Africa: p 11; Rand Merchant Bank: p 11; WesBank: p 11; Momentum: p 14; OUTsurance: p 15
PR6	Programs for adherence to laws, standards, and voluntary codes related to marketing communications, including advertising, promotion, and sponsorship. (Core)	p 50	Reported	See also divisional sustainability reports - First National Bank: pp 15;16; FNB Africa: pp 16;17; WesBank: p 12; Momentum: p 14; OUTsurance p 16
PR9	Monetary value of significant fines for non-compliance with laws and regulations concerning the provision and use of products and services. (Core).		Not Reported	Not Applicable