

2021
Sustainability
report



**For the investor
in all of us**

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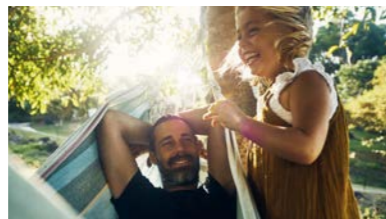


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This is an interactive PDF designed to enhance your experience. The best way to view this report is with Adobe Reader. Click on the links on the contents pages or use the home button  in the footer to navigate the report.

At AMP, we are committed to creating a sustainable and equitable future for our stakeholders and reporting meaningfully on our progress and impact.



Acknowledgement of Country

AMP acknowledges all First Nations Peoples across Australia. We recognise the Traditional Custodians of the land and value the connection to Country, waterways and sky.

We pay our respects to the Elders for their resilience, courage and wisdom; for ensuring the survival of this country's rich culture and heritage.

Our hope for the future is to unite as one people, to listen and learn from each other with respect and walk the path to reconciliation together.

ABOUT THIS REPORT

This report provides a comprehensive overview of AMP's annual sustainability performance. It has been prepared in accordance with the Global Reporting Initiative (GRI) 2021 Standards and the Sustainability Accounting Standards Board (SASB) financial sector topic specific sustainability accounting standard 'Asset Management and Custody Activities'.

EY provides limited external assurance on this report, including select metrics and our carbon neutrality status. EY is also the appointed financial auditor for AMP Limited. The limited assurance statement is provided in the appendix and is provided to the AMP Limited Board as part of the approval of this report.

Our sustainability report forms part of our annual reporting suite, which includes:

Financials

- [2021 Annual report](#)
- [2021 Investor report](#)

Governance

- [2021 Corporate Governance Statement](#)
- [2021 Remuneration report](#)
- [2021 Directors' report](#)

Sustainability and ESG disclosures

- [2021 Sustainability report](#)
- [Sustainability GRI and SASB indices](#)
- [Sustainability Performance Data Summary](#)
- [2021 Modern Slavery Statement](#)

Other disclosures include:

- 2020 Principles for Responsible Investment (PRI) Transparency Report
- 2021 Carbon Disclosure Project (CDP) submission
- Global Real Estate Sustainability Benchmark (GRESB)
- AMP Capital fund level disclosures and ESG performance are available on the [AMP Capital website](#)

REPORT SCOPE

The scope of this annual sustainability report covers AMP's operations globally for the period 1 January 2021 to 31 December 2021. This report was published on 8 March 2022. All dollar amounts are in Australian dollars, unless otherwise stated. Metrics are consolidated at the group level across these entities unless otherwise specified.

The entities that are within AMP Limited's operational control boundary are AMP Australian Wealth Management, AMP Bank, AMP Capital, AMP New Zealand Wealth Management and AMP Foundation (a list of entities covered by AMP's reporting suite and is provided in the [Annual Report](#)). The sale of Life and Mature businesses to Resolution Life was completed in 2020 and the activities of these entities are not included in this report.

Aligned advisers are business partners of AMP and operate under our Australian Financial Services Licences (AFSL) to provide services to our clients. They have been included where relevant in this report. The premises of the aligned advisers and external advisers are not under AMP Limited's operational control.

For questions specifically about this report or the information within, please contact AMP Investor Relations at shares@amp.com.au.

ESG benchmarks

AMP participates in ESG ratings across several benchmarks, including:

BENCHMARK	TREND (YOY)	SCORE TYPE	2021	2020	2019	2018	SCALE
S&P CSA (formerly DJSI)	↑	Score	44% ¹	42%	31%	20%	0–100, 100 highest possible
		Percentile ranking	18	23	55	65	
ISS ESG	↑	Score	C ²	C-	C-	n/a	D- to A+, A+ highest possible
		Sector decile rank	1	3	2	n/a	
Sustainalytics (Morningstar)	↑	Prime rating	Prime	Not prime	Not prime	n/a	0–100, 0 as best possible risk score
		ESG risk rating	29.0	32.6	31.3	n/a	
		Management score	41.8	33.5	35.8	n/a	
MSCI ESG rating	–	Percentile ranking	25	42	n/a	n/a	AAA to CCC, AAA highest possible
		Score	A ³	A	A	AA	
V.E, part of Moody's ESG Solutions	↑	Sector ranking	2 nd Quartile	2 nd Quartile	n/a	n/a	0–100, 100 best possible score
		Score	50 ⁴	40	41	37	
Carbon Disclosure Project (CDP)	–	Score	A- ⁵	A-	A-	A-	A to F, A highest possible
		Sector average	B	B	C	B-	
		Oceania average	B	C	C	C	

1 As at 12 November 2021.

2 As at 2 June 2021.

3 As at 8 October 2021.

4 Vigeo Eiris updated October 2021.

5 Rating as at 7 December 2021.

2021 HIGHLIGHTS

AMP's 2021 sustainability report outlines how we monitor and manage the risks and opportunities associated with our material sustainability issues. It provides a snapshot of our performance and targets in each area.

To AMP, sustainability is our ability to meet the needs of the present without compromising future generations. As custodians of our customers' money and future, we face complex economic, social and environmental challenges which bring both risks and opportunities to our customers, our people and partners, and our community and environment.

FINANCIAL PERFORMANCE

Net profit after tax (NPAT) (underlying)

\$356m

Total assets under management (AUM) and administration

\$248b

Surplus capital above target requirements

\$383m

as at 31 December 2021

Growth in bank deposits

↑10%

Gross cost reductions (excluding AMP Capital)

\$140m

Increase in platform cashflows from external financial advisers

↑18%

BUSINESS PROGRESS

Simplified portfolio

including operational separation of AMP Capital's Private Markets business (Collimate Capital)

Strategies in place

for AMP and Collimate Capital to reposition both for growth opportunities and efficiencies

Purpose and values

work underway to become purpose-led, delivering for our customers, shareholders and employees

CUSTOMERS

\$1.9b

PENSION PAYMENTS for Australian customers in retirement

+27NPS

Positive Net Promoter Score for Australian customers (stable vs FY 20)

+3,300

WITHDRAWALS on hardship and compassionate grounds valued at \$36 million

+10,700

NEW HOME LOANS AMP Bank provided

~\$1b

additional value created for AMP CAPITAL REAL ESTATE clients through shopping centre redevelopments

SHAREHOLDERS

488,237

TOTAL SHAREHOLDERS

PEOPLE AND PARTNERS

71

EMPLOYEE SATISFACTION (eSat score) ↑67

+8,000

hours EMPLOYEE LEARNING and DEVELOPMENT

40:40:20

GENDER DIVERSITY TARGETS MET across Board, middle management and overall workforce

96%

of aligned FINANCIAL ADVISERS completed FASEA exam requirements

COMMUNITIES AND ENVIRONMENT

A-

rating from Carbon Disclosure Project (CDP), second highest rating available

↓36%

reduction in operational SCOPE 1 AND 2 EMISSIONS (from 2019 base year)

+20

ESG FOCUSED INVESTMENT OPTIONS added to our flagship investment platform, MyNorth

+\$3.2m

DISTRIBUTED TO CHARITIES AND INDIVIDUALS via the AMP Foundation

COMPLETED SMALL SHAREHOLDING SALE FACILITY, ENABLING

205,148

SHAREHOLDERS

holding less than A\$500 fully paid ordinary shares to sell their holding without incurring brokerage costs at \$1.09 per share

CHAIR AND CEO MESSAGE

We are committed to creating a sustainable and equitable future for our stakeholders



Welcome to AMP's 2021 Sustainability Report. At AMP, we are committed to creating a sustainable and equitable future for our stakeholders and reporting meaningfully on our progress and impact.

Our role in sustainable development

AMP has a long history of social impact in the communities we operate in, it has been in our DNA as a company since it was founded in 1849. Our businesses have helped to provide financial security for families, support retirement, purchase first homes and invest in nation building projects and infrastructure. We recognise that AMP has not always met the expectations of our stakeholders, but we have made strong progress on correcting past mistakes and have taken steps to ensure these do not occur again.

Today we are continuing to embrace the larger societal challenges and play our role in addressing them, even during a period of substantial change to our business structure. In 2021, our customers, people and the broader community have continued to experience the pressures arising from the COVID-19 pandemic, technological change, social inequalities and climate change.

AMP's role in addressing these challenges is articulated in our sustainability approach, which outlines how we seek to create a sustainable and equitable future for our stakeholders – our customers and members, people and partners, and the community and environment.

Delivering for our customers

In 2021, we have continued to provide support for those impacted by the COVID-19 pandemic. We have supported early access to superannuation on compassionate and hardship grounds, provided home loan hardship care and provided customers with access to information and tools online.

This is in addition to the transformation of our Wealth Management business, where we have rationalised our superannuation product offering to deliver fee reductions, strengthened investment returns and enhanced our platform offering to advisers and their clients.

In AMP Bank, we are investing heavily in growth and supporting customers in achieving home ownership with competitive home loan rates and competitive savings products.

In AMP Capital, our teams delivered close to A\$1 billion of retail property developments (Marrickville Metro, Karrinyup) and successfully sold major stakes in infrastructure assets (Angel Trains and ESVAGT) creating significant value for clients. In 2021, we also welcomed Shawn Johnson as CEO of Collimate Capital in the lead up to its proposed demerger in June 2022.

Supporting our people and partners

We have made significant progress on implementing the actions arising from the external workplace conduct review in 2020. Our teams have implemented over 95% of the actions planned for 2021, which included updates to our Workplace Conduct Policies and Consequence Management processes, increased avenues to raise concerns, increased support to employees and expanded our internal and external reporting. We are building on our conduct disclosures in this report to include how AMP prevents, manages and responds to sexual harassment, in line with emerging guidance for companies.

These actions are in addition to the continued work to create an inclusive culture, including inclusion training for all employees, reaching our 40:40:20 gender diversity targets at board, middle management level and across the workforce generally, and our ongoing commitment to employee led diversity groups such as AMProud.

We are also proud to see the progress of our Reconciliation Action Plan (RAP) Committee, having delivered more than 60% of our commitments since its launch in 2020. This progress reflects the importance of building respect and opportunities with First Nations communities and AMP's role in supporting Reconciliation more broadly in the Australian community.

AMP also offered support to employees through a range of mental and physical health services during a period of significant disruption from ongoing COVID-19 restrictions and remote working.

In 2021, AMP announced several important changes to its advice service model that gives its network of advisers increased choice, flexibility and transparency in how they partner with AMP and operate their business. We also continued to assist the advice network through significant industry change, including supporting aligned advisers to meet higher education standards.

AMP is also taking important steps on addressing Human Rights and Modern Slavery through our partnerships and supply chains, with expanded disclosures on these issues included in this reporting suite.

Investing in our communities and the environment

In the community, we recognise and support the growing momentum for global action on climate change and supporting some of our most vulnerable communities.

In 2021, we launched our Climate Position and Action Plan which details how we are managing our business and investment activities in alignment with net zero emissions by 2050. This builds on our long-standing commitment to action on climate, having been carbon neutral across our global operations since 2013. There is more to do, and the challenges presented by climate change for the global economy are far-reaching and substantial.

Through the AMP Foundation, AMP's philanthropic arm, we have contributed more than \$108 million to Australian communities through direct donations, employee dollar matching, employee fundraising and volunteering since its inception in 1992.

Setting up AMP for the future

2021 has been a period of change for AMP, after the announcement of the proposed demerger of Collimate Capital, consisting of the Real Estate and Infrastructure Equity investment platforms. This will allow for greater focus of the two demerged businesses to deliver for their distinct client and customer bases.

As part of our continuing simplification of AMP we have also announced the sale of several businesses, including the Global Equities and Fixed Income business, Infrastructure Debt and AMP's employed advice network. These changes are about finding the right owners for these businesses as AMP simplifies to be a contemporary wealth management company.

During this transformative period we are proud to lead this organisation through to its next phase. We are confident that the changes will position AMP for a strong and sustainable future. We also value the importance of being a purpose-led company and believe that our purpose should build on our heritage and reflect the nature of our business today. With that in mind, we have engaged employees across the organisation to inform the development of our new statement of purpose and values, which we look forward to unveiling in 2022.

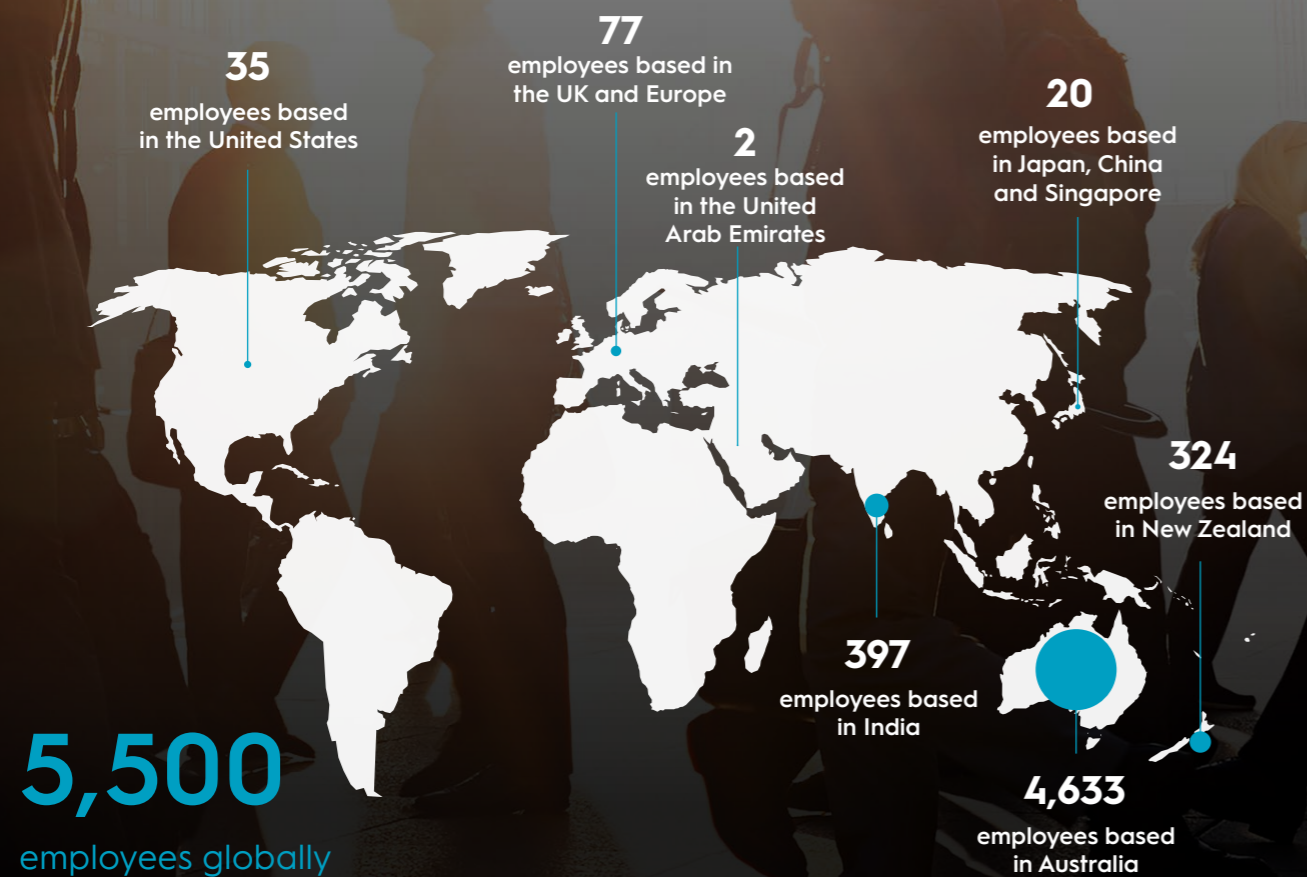
Debra Hazelton
Chair

Alexis George
CEO

ABOUT AMP

AMP is a financial services company offering customers financial advice and superannuation, retirement income, banking and investment products across our portfolio of businesses. AMP has a long history of helping our customers manage their investments and achieve their financial goals.

AMP and its subsidiaries have over 5,500 employees globally, predominantly based in Australia (4,633 employees) and New Zealand (324 employees) and is headquartered in Sydney, Australia. Internationally, we have 77 employees based in the UK and Europe, 35 employees in the United States, 397 employees in India, 20 employees in the Asia Pacific region (including Japan, China and Singapore) and two employees in the United Arab Emirates.



Australian Wealth Management

AMP Australian Wealth Management provides retail and workplace superannuation products and self-managed superannuation funds (SMSF) services, as well as retirement income solutions and investments for individuals, through our Platforms business.

Through our employed and aligned advice network, we support 1,097 advisers in Australia to provide quality financial advice to clients, including Charter and Hillcross licensees. In 2021, we announced the sale of the employed advice network.

SuperConcepts offers customers a suite of SMSF administration services, with \$17.4 billion in assets under administration and has operations in Australia and India.

Superannuation Trustee is responsible for the governance of AMP superannuation funds for members. It outsources a range of services to AMP entities and external service providers, such as administration and investment management services.



AMP Bank provides customers with home loans, deposit and transaction accounts in Australia. It provides limited advice practice lending and does not provide business or corporate banking services to industries.



New Zealand Wealth Management

In New Zealand, we provide customers with a variety of wealth management solutions including KiwiSaver, corporate superannuation, retail investments, a wrap investment management platform and general insurance.



AMP Capital is a global investment manager, which services institutional and direct clients, including AMP. We have offices and operations globally, including in the United Kingdom, Europe, the United States and Asia Pacific. In real assets, we manage office buildings, retail shopping centres and industrial assets, predominantly based in Australia. We also manage infrastructure funds, which include airports, trains and pipelines on behalf of clients. In 2021, AMP announced a plan to separate and demerge AMP Capital's Private Markets business. The business, which has re-branded as Collimate Capital, is expected to be listed as a separate entity in 2022. AMP also announced the sale of its Infrastructure Debt business in December 2021.

In public markets, we manage equities, fixed income, diversified, multi-manager and multi-asset funds on behalf of clients around the world. In 2021, AMP announced the sale of its Global Equities and Fixed Income business. The multi-manager and multi-asset investment capability has moved to AMP Australian Wealth Management.

Strategic partnerships

AMP group and business units hold several strategic partnerships, including:

19.13%

equity interest in Resolution Life Australasia¹

19.99%

of China Life Pension Company (CLPC)

14.97%

of China Life AMP Asset Management Company Limited (CLAMP)

24.9%

of US real estate investment manager, PCCP

As these are minority, non-managing stakes, these entities are not included as part of this report.

¹ AMP announced the sale of this stake in 2021, to be completed in 2022.

OUR STRATEGY

AMP Limited is an Australian and New Zealand diversified wealth manager with a retail customer base.

The path to a new AMP

Streamline portfolio with a relentless focus on customers.

KEY ENABLERS



PURPOSE AND CULTURE



BRAND, REPUTATION AND ESG



DIGITAL AND DATA CAPABILITY



RESPECT RISK

Reposition

- Invest to grow AMP Bank
- Grow the north platform, building new relationships with external financial advisers
- Deliver stable earnings and optimal customer outcomes in Master Trust and New Zealand Wealth Management
- Accelerate the transformation of Advice

Simplify

- Execute the demerger
- Redefine and right-size the operating model for agility and efficiency
- Continue to renew portfolio of assets to ensure AMP is the right owner
- Enhance shareholder value through disciplined capital management

Explore

- Establish direct-to-consumer solutions in selected areas
- Develop leading position in retirement
- Explore adjacent new business models (organic and inorganic)

THE DEMERGER

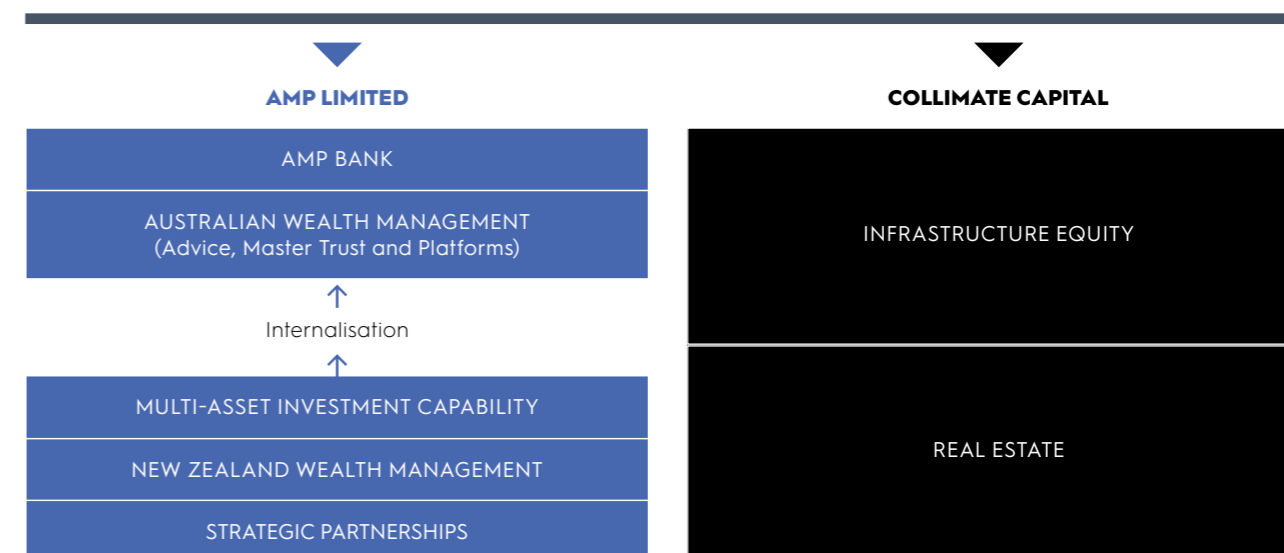
In 2021, AMP announced a plan to demerge the AMP Capital Private Markets business (including Real Estate and Infrastructure Equity) known as Collimate Capital, from AMP Limited. The purpose of this demerger is to separate AMP Limited into two more focused companies that service different clients and geographies, with different cultures and growth trajectories.

AMP Limited and Collimate Capital will benefit from:

- Enhanced ability to focus on core businesses and new market opportunities.
- Simplified operating models and ability to drive greater efficiencies.
- Direct access to capital markets to support growth.
- Strengthened ability to attract and retain clients and talent.
- Focused and independent management teams in each business.

The demerger is expected to be completed in June 2022.

AMP SHAREHOLDERS



UP TO 20% STAKE

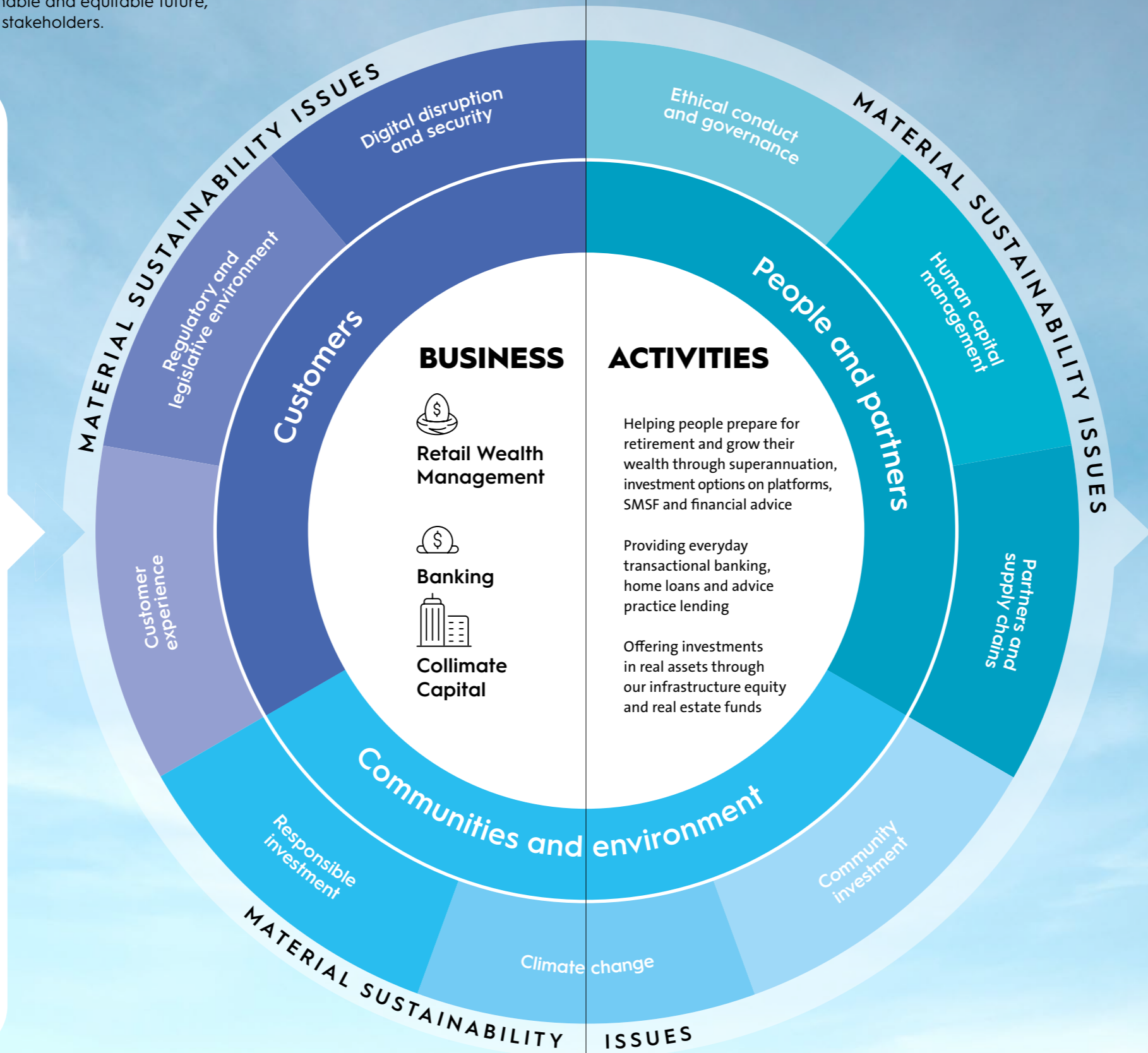
HOW WE CREATE VALUE

Committed to a sustainable and equitable future, creating value for our stakeholders.



VALUE DRIVERS

- ▶ Financial capital**
 Attracting retail and shareholder investment flows and generating investment returns
- ▶ Human and intellectual capital**
 Attracting, retaining and developing talent and our products and systems that deliver outcomes for our stakeholders
- ▶ Risk management**
 Continuously strengthening processes to identify, measure and respond to risks
- ▶ Technology and data**
 Creating digital experiences, digitising our processes and using data to support decision making
- ▶ Social and relationship capital**
 Working with our stakeholders, building trust with the community and learning from our peers
- ▶ Manufactured capital**
 Investing in the management and development of real assets through our diversified portfolios
- ▶ Natural capital**
 Considering how resource use and climate change impact our investments and operations



VALUE CREATED 2021

- ▶ Financial and shareholder**
 \$248b Assets under management and administration
 \$356m net profit after tax (NPAT) underlying
- ▶ Customers**
 \$1.9b in pension payments to support customers in retirement
 45,761 mortgage customers supporting home ownership in Australia
 +27 NPS across all Australian customer interactions
- ▶ People and partners**
 +71 employee satisfaction score (eSat)
 8,880hrs of professional development for employees
 1,097 advisers supported with an average of \$69m in AUM for clients
- ▶ Communities and environment**
 9yrs Carbon neutral across global operations
 +\$3.2m distributed to charities and individuals via the AMP Foundation



SUSTAINABILITY GOVERNANCE

Sustainability and environmental, social and governance (ESG) issues are managed through AMP's governance structures and risk management frameworks.

The AMP Limited Board and Board Risk Committee oversee management of sustainability-related issues for AMP shareholders and delegates responsibility for management of impacts to the CEO. The CEO and Executive Committee manages and monitors AMP's material sustainability framework through the Group Risk and Compliance Committee, constituting all members of the Executive Committee. These committees and the Board review the outcomes of the sustainability materiality review (outlined in [Stakeholder Engagement section](#)) and associated performance disclosures annually.

In 2021, the Executive Committee and Board Risk Committee was engaged on several ESG-related issues including:

- Workplace conduct and operational risk matters;
- Purpose, values and culture;
- Diversity and inclusion;
- Human rights considerations, including modern slavery;
- Climate change;
- 2021 sustainability material issues framework and basis for this report.

Within the AMP Group, there are several other boards that oversee governance of AMP activities in the best interests of other stakeholders, including superannuation members, clients and investors. These boards consider relevant ESG and sustainability-related issues as required.

To support delivery of sustainability and ESG-related programs, there are several cross-functional groups with representatives across the organisation, for example:

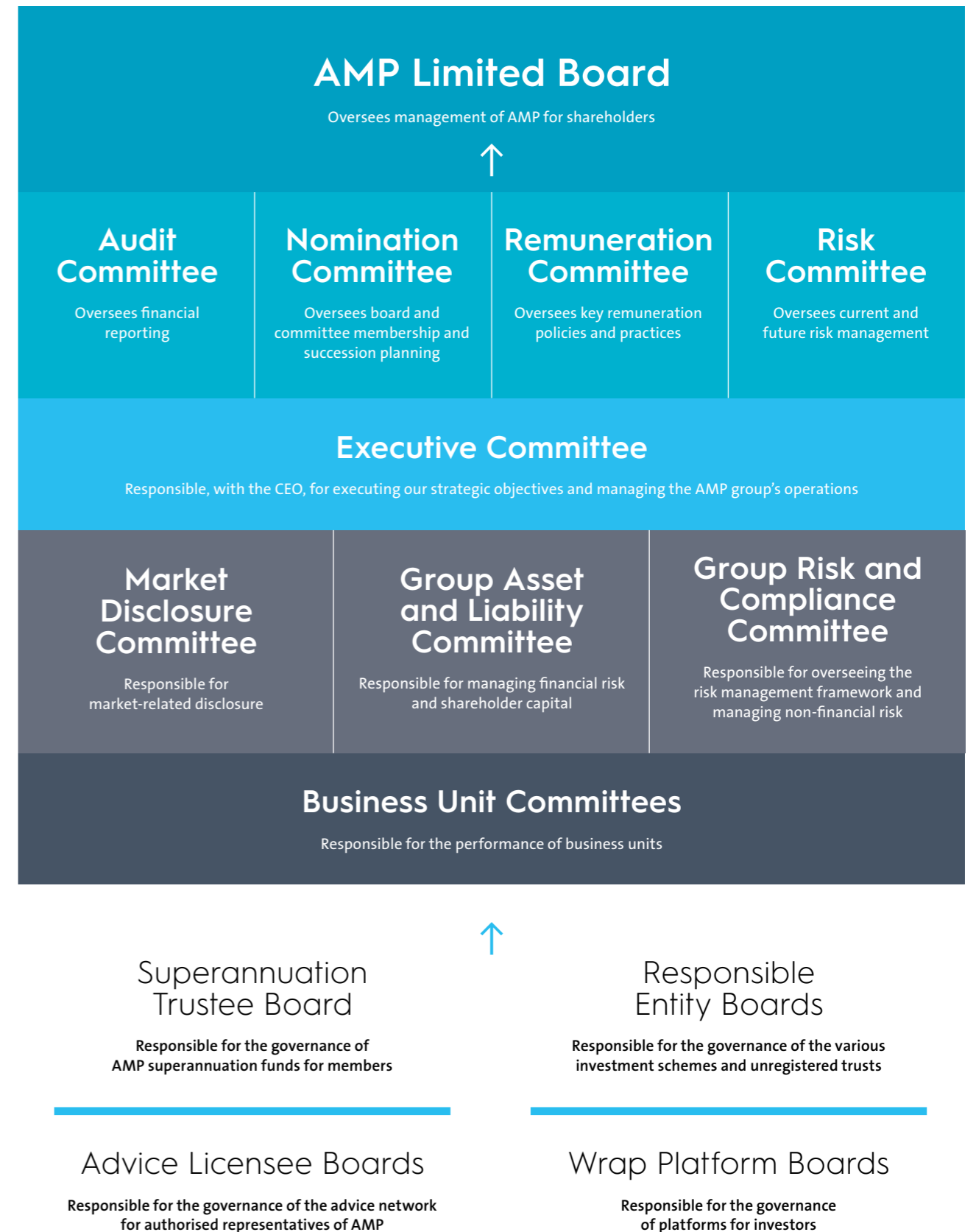
- 1 [Environment and Climate Change working group](#)
- 2 [Modern Slavery working group](#)
- 3 [Reconciliation Action Plan Committee](#)
- 4 [Diversity and inclusion employee groups](#)

▶ **For further details about AMP's governance structures and risk management frameworks, please see the [Corporate Governance Statement](#) and [Enterprise Risk Management Policy](#).**

AMP Youth Advisory Committee

The Youth Advisory Committee (YAC) is a group of high performing students who are passionate about sustainability and ESG issues, represented by 14 members from 12 different universities across Australia and New Zealand. Each student has been nominated by their university to represent their peers, engage in robust discussions and ultimately offer new perspectives on how AMP might better consider and respond to issues of significance for young Australians.

In 2021, members of the YAC provided insights and recommendations on the ethical screens across a range of specific ESG funds and ways to improve disclosure on climate change, diversity and inclusion, and biodiversity. Several of these recommendations have been incorporated into the 2021 Sustainability Report and others will be considered as work progresses on different ESG and Sustainability issues throughout 2022 and beyond.



STAKEHOLDER ENGAGEMENT

AMP assesses the issues of greatest importance and impact to our customers, our people and partners, and our community and environment annually through our materiality assessment process.

In 2021, material issues were assessed through a process of reviewing and analysing feedback from stakeholders, building from our 2020 framework. We used existing feedback mechanisms and interviews with approximately 50 internal and external stakeholders to specifically discuss AMP's most material sustainability issues for 2021. This process is led by our Group Sustainability team and the outcomes are approved by the Executive Committee and the AMP Limited Board annually.

Industry associations

AMP also collaborates with several industry associations relating to sustainability and ESG, including:

AMP Limited

- Business Council for Sustainable Development Australia (BCSDA)
- Australian Banking Association (ABA)
- Responsible Investment Association of Australasia (RIAA)
- Financial Services Council (FSC)

AMP Capital

- Investor Group on Climate Change (IGCC)
- Principles for Responsible Investment (PRI)
- Property Council of Australia (PCA)
- Green Building Council of Australia (GBCA)

ENGAGEMENT METHODS

TOP THREE ISSUES of importance for these stakeholders:

Customers



- Net Promoter System (NPS) verbatims and scores
- AMP Customer Advocate
- Consumer research (focus groups)
- Social media
- Direct phone calls and emails

1. Digital experience
2. COVID-19 support
3. Investment performance

Employees and advisers



- Monthly 'Glint' employee surveys
- One-on-one phone interviews
- Internal communication channels, such as Workplace
- Performance reviews

1. Human capital management
2. Culture, including diversity and inclusion
3. Climate change and responsible investment

Investors and shareholder



- Telephone/video conference briefings
- Annual General Meeting
- Investor briefings at half and full year results
- AMP Shareholder site
- ESG ratings and ad-hoc investor ESG requests
- Proxy adviser engagement

1. Culture and conduct
2. Customer retention and business performance
3. Employee retention and engagement

Government and regulators



- Submissions and appearances at forums such as the House Economics Committee
- Meetings with parliamentarians and regulators

1. Social licence to operate, trust and community expectations
2. Culture and conduct
3. Governance

Community



- Youth Advisory Committee
- Market research and insights
- Website and social media communication
- Grant programs through AMP Foundation

1. Social licence to operate, trust and community expectations
2. Ethical conduct and governance
3. Investment performance

MATERIAL ISSUES

AMP’s materiality review process considers the impacts of issues both internally to our business and externally to society. We consider the financial and non-financial impact, including human rights impacts, to our stakeholders.

In 2021, our culture and human capital related issues have remained high in relative importance among our stakeholders in response to feedback on the importance of people, talent and capability in order to deliver for other stakeholders groups.

Since the Royal Commission in 2018, trust in institutions and social licence to operate have featured heavily in discussions with stakeholders. It is not treated as a discrete issue in the framework as feedback suggested that addressing all of our material issues detailed in this report serves to address this broader issue.

We have also updated the following issues based on stakeholder feedback:

- *Digital disruption and security* has increased in relative importance among stakeholders due to: ongoing cyber security threats globally; the importance of digital capability to enable AMP’s strategy and providing direct to customer channels; and supporting remote and collaborative working.
- We have amended *Client experience and investment performance (2020)* to *Customer Experience* to include obligations to AMP’s customers, clients and members across our portfolio of businesses. Investment performance is considered within this issue.
- We have removed *Operational impacts and supply chain (2020)* to be replaced with *Partners and supply chains*, recognising the role of advisers, service providers and intermediaries to support AMP’s strategy. Operational impacts are now covered under *Climate change*, as they predominantly relate to emissions.

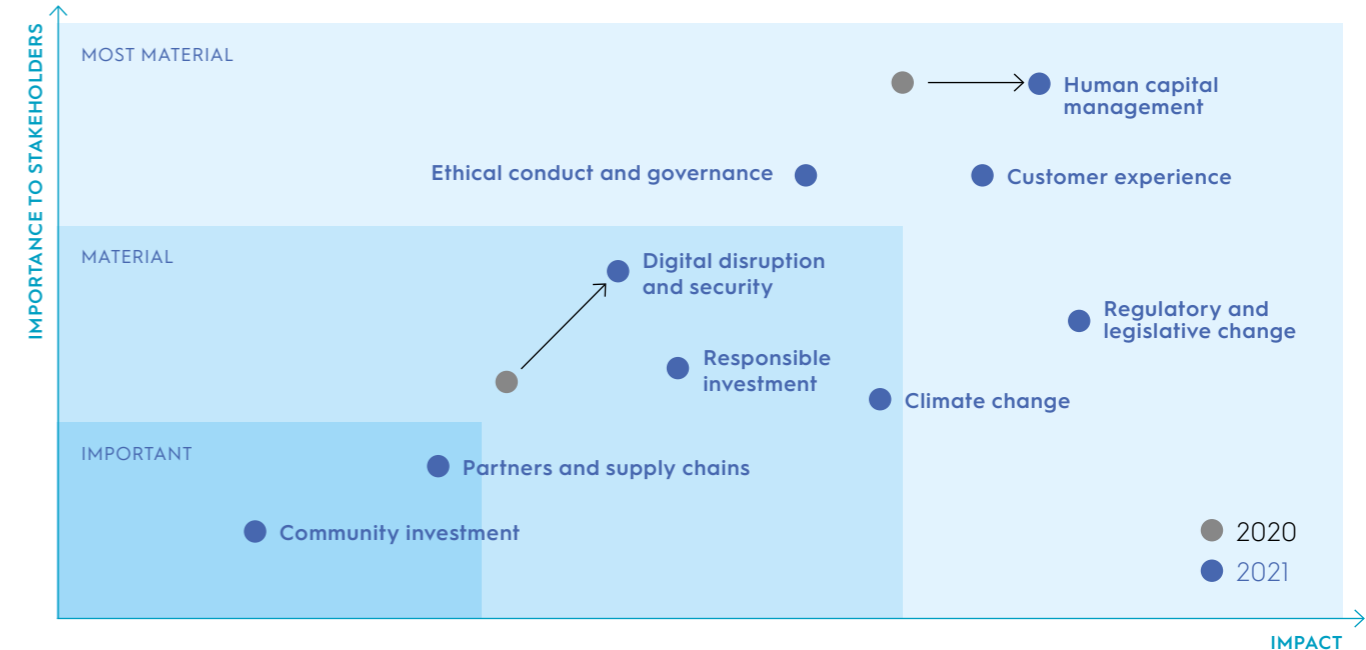
Human capital management, which includes culture, inclusion and diversity, and talent attraction and retention, continued to be top of mind in discussions with stakeholders. Given this continued focus, the relative importance of this people-related issue ranked highest in both importance to stakeholders and impact, making it our most material issue in 2021.

The relative importance of several other issues has reduced given the increased focus on *Digital disruption and security* and *Human capital management*. Despite these changes, we continue to focus on our responses to these important issues. Further, we report on each issue in line with Global Reporting Initiative (GRI) and the Sustainability Accounting Standards Board (SASB) financial sector topic specific sustainability accounting standard ‘Asset Management and Custody Activities’. The issues for 2021 are summarised on [page 19](#).

The impact of COVID-19 and remote working continued to feature in our discussions with stakeholders. As in 2020, this was not treated as a distinct issue, and COVID-19 related impacts are assessed through our identified material issues.

Other macro-economic trends raised in discussions included issues such as the economic recovery, unemployment, an ageing population and health. These issues are considered within the context of the nine material issues identified in this report.

Our materiality matrix



Material issues – Our sustainability Framework

We have aligned our material issues to the United Nations Sustainable Development Goals (SDGs) and throughout 2022 we will be continuing to assess where we can drive more impact and how we can equip our people with the skills to support progress towards the SDGs.

Customers

- Customer experience**
Demonstrate how we are a customer-led business focused on helping them to invest and achieve their financial goals. This includes the processes we have in place to assist vulnerable customers and manage complaints.
- Regulatory and legislative environment**
Demonstrate how we are responding to global and domestic legislative and regulatory changes that are shaping the value of financial services for customers over the short and long term.
- Digital disruption and security**
Demonstrate how we respond to digital disruption in financial services and embrace opportunities to deliver digital customer experiences that are personalised and proactive. This includes how we manage and maintain security processes to protect customer data.

People and partners

- Ethical conduct and governance**
Demonstrate how we use culture, governance, accountability, processes and controls to rebuild trust in AMP and the financial services sector. This includes ensuring our employees act ethically and quickly resolve issues to a high professional standard.
- Human capital management**
Demonstrate how we attract, develop and retain the skills and talent of our people as key assets to AMP’s ability to create value for customers and shareholders. This includes employee attraction and retention, diversity and inclusion, and wellbeing.
- Partners and supply chains**
Demonstrate how we are supporting our partners and managing the direct and indirect social and environmental impacts arising from our purchasing decisions.

Communities and environment

- Responsible investment**
Demonstrate how we consider environmental, social and governance (ESG) factors in our investments to drive long-term value creation for our clients and the community.
- Climate change**
Demonstrate how we are managing the investment risks and opportunities presented by climate change for our customers and community. This includes leveraging our influence as a global investor and how we reduce the impact of our investment activities.
- Community investment**
Demonstrate how we create value for communities through philanthropic activities and engage employees with fundraising and volunteering opportunities.



CUSTOMERS

Customer experience

Serving customers well, through competitive, high-performing services is critical to the sustainability of financial services companies and creating value for the markets we serve. We are focused on providing a positive experience when customers choose AMP to help them achieve their goals across our range of services from investment management, superannuation, banking and advice.

Our focus is continuing to build a culture that has customers at the forefront of our thinking and decision making. We seek to understand our customers' needs, listen to their feedback and empower our customer facing teams to provide service excellence. AMP is also committed to supporting fair and equitable outcomes for customers experiencing vulnerability or when complaints arise. AMP seeks to support customers who face hardship or have been impacted by economic disruption caused by COVID-19. This approach helps us build positive, long-term relationships with our customers.

In Australia, we are reshaping and simplifying our Wealth Management business to deliver better outcomes for members, while AMP Bank

continues to support customers in purchasing their homes and providing attractive cash investment options.

In New Zealand, we have transitioned to a new investment manager, BlackRock, to enhance our investment performance and deliver greater value to our New Zealand customers.

In our global investment management business, AMP Capital, our focus is on delivering strong outcomes for our institutional clients throughout a period of significant change. During the year, we announced the sale of our businesses in Global Equities and Fixed Income and Infrastructure Debt, as well as our plans to demerge Collimate Capital in 2022 (these changes are detailed in the [About AMP Section](#)).

ALIGNED SDG



2021 at a glance

PAID

\$1.9b

in pension payments to Australian members to help them in retirement

HELPED MORE THAN

160,000+

customers with their banking needs and provided over

DELIVERED SOLUTIONS FOR

359

institutional clients in Australia and New Zealand and

10,700+

new home loans

397

internationally through AMP Capital

RECEIVED

1,100,887

calls, supporting customers with their superannuation, banking and investment needs

PROVIDED CONTINUED SUPPORT

to customers experiencing financial hardship, including processing **+3,300 SUPERANNUATION WITHDRAWALS** on hardship and compassionate grounds valued at

\$36m

Supporting customers

Being a customer-led business means delivering and supporting customers who face hardship or require access to funds on compassionate grounds. This includes those suffering from the economic impacts of COVID-19.

Superannuation: In 2021, AMP processed 1,257 superannuation withdrawals totalling \$21.8 million for members on compassionate grounds and 2,052 withdrawals for those experiencing financial hardship for a total of \$14.1 million. AMP also supported the Australian Government's early release of superannuation program in response to COVID-19, which completed in early 2021. In 2021 AMP processed 1,479 remaining requests valued at \$11.5 million, following the 223,473 requests in 2020, where we provided \$1.83 billion in funds to members who required support.

Bank: In addition to the initial repayment pause support provided in 2020 and early 2021, AMP Bank provided further assistance to 266 home loan accounts valued at a total of \$148 million because of ongoing COVID-19 impacts. Our dedicated financial hardship team continue to provide tailored support to our customers. As at January 2022, 99% of accounts and 98% of loan balances have exited repayment pause, with 90% resuming normal repayments and the remaining receiving further assistance under the Bank's standard hardship program.

Advice: Our advisers also rolled out a suite of webinars to clients covering topics such as retirement, budgeting, early release of super, investment market updates and estate planning.

AMP Capital Real Estate: our team continued to support retailers and office and logistics customers impacted by the pandemic through support measures, including rent relief, flexibility of payment terms and trading hours, and tailored support to help businesses with their individual needs.

Simplifying our business

As part of our customer-led strategy, AMP has focused on simplifying and improving the value of our products and offers. In 2020, we removed grandfathered commissions, ahead of the legislative deadline, with the benefits from cancelling the commissions previously received by AMP and our advisers being returned to customers. We also undertook further fee reductions for customers, building on the decreases we've been implementing since 2018.

In 2021, we implemented the next phase of simplification by further rationalising our Master Trust portfolio from 11 products down to three under SignatureSuper, our highest rated brand in the market. We also simplified fee structures while ensuring approximately 75% of our members paid lower fees and most of remaining members' fees were unchanged. Furthermore, we introduced a refined investment menu of roughly 30 options more aligned to customer needs and reducing administrative overheads.

These initiatives have delivered operational efficiencies, reduced risk and increased product resilience, to benefit our customers and members.

New Zealand Wealth Management

In New Zealand we delivered a new investment approach with a focus on sustainable investing, which resulted in a material fee reduction for AMP KiwiSaver Scheme clients of up to 40%. The transition to an index management investment approach and the appointment of BlackRock Investment Management to provide key investment services will deliver ongoing value for clients.

CUSTOMER EXPERIENCE

Communications and marketing to customers

Simplification of our products also allows for more effective communications and transparency of our services to customers and members. We regularly communicate with customers through a range of targeted communications, product disclosure statements, annual reports and updates available on our websites. Customer communications cover a range of super and financial topics, including super and regulatory change, insurance, fees and investment outlook and performance.

AMP superannuation members also benefit from technology that delivers tailored communications aligned to their stage of life, designed to engage members with relevant messages at the right time. The data driven program includes 16 different customer conversations across the accumulation, pre-retirement and retirement phase. Topics include beneficiaries, voluntary contributions, and digital activation. The program delivered 1.3 million communications across email, SMS, and phone channels in 2021.

A key focus in 2021 was supporting members in the pre-retirement segment as they approach retirement and begin accessing superannuation. Our program covers five topics, including perseveration age, retirement readiness and downsizing. These communications are supported with an opportunity for members to book a retirement health check. The retirement health check is designed to assist a member prepare for retirement with a retirement specialist discussing topics such as how much super is enough to retire, age pension entitlements and accessing super.

Financial wellness

AMP conducts financial wellness research every two years. The most recent research was conducted in 2020 and informs our approach with our superannuation members, including Member Education Managers who share their expertise with superannuation members on topics such as tax legislation, super contribution caps and retirement options.

In 2021, our Member Education teams had over 2,000 attendees to our webinars and 3,570 one-on-one meetings with members across our employer and retail members.

Acting on customer feedback

AMP uses the Net Promoter System (NPS) to continually listen and learn from the feedback of our customers and take action to improve experiences. The NPS system measures how likely customers are to refer AMP to their friends and family. The feedback provides valuable insights about what is important to customers and has shaped many changes to our processes and systems.

In 2021, customer NPS remained steady at +27, with improvements to self-service capability across digital assets balanced out by the new challenges presented because of the COVID-19 pandemic.

Net promoter score

	2021	2020 ¹	2019 ¹
Customer NPS (average for Australian customers)	+27	+27	+16
Number of NPS surveys (Australian customers)	19,722	50,049	64,721

AMP RECOGNISED in Money Magazines awards²

AMP Bank has been recognised in Money Magazine's annual 2021 'BEST of the BEST' awards. AMP received two awards – for the Best Term Deposits – Long Term (Major Bank)³ and Best Everyday Savings Account (Major Bank) for our AMP SuperEdge Cash Account. These awards reflect the quality investment and savings products available to customers.

¹ The 2019 and 2020 figures excludes AMP Life business for comparative purposes.

² The rate for this product is 0.4% for 1 year (\$10,000), 0.75% for 3 years (\$50,000), 0.75% for 5 years (\$100,00).

³ SuperEdge Saver – Cash, Money Magazine's Best of the Best Awards, Winner: Money magazine's Best Everyday Savings Account (Major Bank) 2021. Term Deposit, Money Magazine's Best of the Best Awards, Winner: Money Magazine's Best Term Deposits – Long Term (Major Bank) 2021. For more information about these awards refer to [Money Magazine's website](#).

AMP Customer Advocate

In 2021, the Customer Advocate evolved its focus from resolving escalated complaints to being a voice for customers and driving for fair customer outcomes. Complaints are managed within business lines (refer to page 25).

The Customer Advocate has an emphasis on supporting our customers in challenging circumstances due to vulnerability or accessibility issues. The revised AMP Customer Advocate purpose has been approved and documented in a new charter and functional design. The AMP Customer Advocate provides support through three focus areas:

- 1 Engagement and awareness:** being a voice for the customer to achieve better outcomes.
- 2 Customer advocacy and policy:** making things easier by facilitating fair outcomes, putting fairness at the centre of decisions.
- 3 Customer assurance:** minimising the likelihood of future problems and making sure AMP is embedding the right change.

Customer Vulnerability and Accessibility Framework and Thematic Reviews

Our commitment to customers is demonstrated in the Customer Vulnerability and Accessibility Policy which outlines how to treat customers with sensitivity, respect and compassion. Customers can expect extra support from us when they are experiencing vulnerability or facing accessibility barriers and require help with their individual needs. The [AMP website](#) contains centralised online resources for customers, providing useful information about the special care or additional assistance AMP can offer.

AMP undertakes thematic reviews of key themes of customer vulnerability to build a deeper understanding of current and emerging issues, assess the effectiveness of AMP's responses and fairness of the outcomes. Opportunities for improvement identified as part of this process are recommended to the business as future focus areas.

- ▶ Details of the support provided is detailed under Supporting customers (p.21).



We have added 28 new managed portfolios to North in 2021 and will build on the offer as we continue to broaden North's overall investment menu.

North Platform enhancements

In 2021, AMP significantly enhanced its platform and managed portfolio offerings through its flagship Wrap platform, MyNorth. As part of our commitment to delivering market leading offers for clients and their advisers, AMP reduced administration fees for clients and advisers by up to 22% on its MyNorth, North and Summit platforms. There are more than 210,000 clients across these platforms, representing approximately 90% of AMP's platform clients. We also reduced minimum brokerage fees for clients buying shares through the North platform.

North continued its growth in 2021, including its managed portfolio range, which rose to more than A\$4 billion in assets under management, a four-fold increase from September 2020. North's managed portfolio offer also includes MyNorth IndexPlus Managed Portfolios, which blend low-fee, low-turnover index-based investments with actively managed strategies, providing a diverse and cost-efficient investment solution. We have added 28 new managed portfolios to North in 2021 and will build on the offer as we continue to broaden North's overall investment menu.



CUSTOMER EXPERIENCE

Superannuation investment performance and heatmaps

In 2021, AMP delivered strong investment returns across our AMP retail superannuation funds. AMP's MySuper Lifecycle fund delivered an average return of 20% for the financial year ending 30 June 2021. Those members under the age of 50, who are provided with a higher growth asset allocation, have achieved returns between 21.6% and 23.8% for the financial year. The returns are net of fees and superannuation tax.

The largest group of AMP MySuper members are in the MySuper 1970s cohort, which achieved 21.6% returns in the 12 months to 30 June 2021 and achieved 9.0% annual returns over the past five years.

AMP welcomes further transparency across the superannuation industry, with APRA's MySuper Product Heatmap reports and Performance Assessments, which compares performance of default MySuper funds. In 2021 AMP MySuper products passed APRA's inaugural Annual Performance Assessment.

AMP Capital Investment performance

Through our investment management business, AMP Capital, we aim to be a trusted partner of our clients, delivering consistent investment performance. In 2021, AMP Capital was the appointed asset manager for a majority of the assets under management of Australian Wealth Management, including superannuation members and default MySuper funds. As part of the announced demerger, the multi-asset investment capability in AMP Capital has moved to Australian Wealth Management, which is expected to be complete in 2022.

As of December 2021, the proportion of AMP Capital's Assets Under Management (AUM) performing at or above benchmarks was 68% over three years. Our internal target is 75% over three years.

AMP Capital saw mixed results in real assets, with 72% of real estate investments meeting or exceeding benchmarks over a three-year period. Infrastructure equity funds continued to experience challenges due to market volatility, with economic impacts from COVID-19 impacting returns on certain sectors, including airports and shopping centres.

AMP Capital investment performance

	2021	2020
AMP Capital assets under management (AUM) meeting or exceeding benchmarks	68%	66%
AMP Capital Public Market assets under management meeting or exceeding benchmarks over a three-year period	72%	62%
AMP Capital Infrastructure Equity AUM meeting or exceeding benchmarks over a three-year period	48%	73%
AMP Capital Real Estate AUM meeting or exceeding benchmarks over a three-year period	72%	72%

Customer complaints

During 2021, AMP continued to enhance our complaints handling capability with continued focus on tracking the number of complaints received, improving the customer experience, and the delivery of fair and timely outcomes. To achieve this, AMP has:

- Made it easier for customers to make a complaint with the creation of an online complaints form.
- Developed a customer facing complaints guide so our customers know what they can expect when making a complaint.
- Delivered further training to complaint handling staff to uplift our ability to guide and support customers through the complaint process.
- Strengthened our customer-facing teams' internal feedback processes with the establishment of regular feedback sessions to share insights and learning to ensure continuous improvement to AMP's service and delivery to its customers.

Total complaints decreased in 2021 from previous years primarily due to reduced customer numbers and the separation of AMP Life in 2020. This change is reflected in reduced complaints in Superannuation, Retirement and Platforms. Bank-related complaints increased in 2021 with growth in home loan and deposit customers being a major driver.

Complaints

	2021	2020	2019
Total complaints received in Australia ¹	12,501	13,247	19,647
– Advice	732	849	697
– Bank	4,949	2,470	1,807
– AMPCFM ²	147	253	380
– Superannuation, Retirement and Platforms	6,673	9,675	16,795
Number of complaints escalated to an External Dispute Resolution (EDR) scheme ²	506	583	906

¹ 2020 and 2019 include complaints relating to AMP Life, as separation occurred on 1 July 2020. Excludes SuperConcepts.

² AMPCFM complaints are direct retail investors with AMP Capital.

Future outlook

Our strategy to become a customer-led, simpler and growth-oriented business will see AMP focus on delivering strong customer outcomes. This includes:

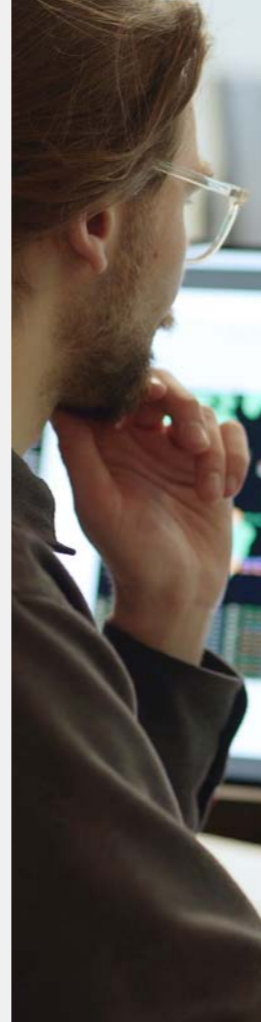
- Completing the proposed demerger to allow our two businesses, AMP Limited and Collimate Capital, to allow greater focus on retail customers and institutional clients respectively.
- Further simplifying our superannuation products and investment options for customers and members providing greater value through lower fees and investment performance.
- Prioritising the identification and resolution of customer complaints.
- Delivering on our enterprise approach to customers experiencing vulnerability and accessibility barriers, and embedding the AMP Fairness Principles into all decision making.

Regulatory and legislative environment

The financial services sector, in which AMP operates, is highly regulated and subject to regulatory scrutiny and legislative change, as well as continued media and political focus. AMP supports strong and stable financial systems that are critical to the success of local and global economies, and our ability to meet the needs of our customers. As a participant in these markets, AMP regularly engages with the regulators and legislators who oversee the system to ensure the interests of our stakeholders are represented.

In Australia, AMP's regulators include Australian Prudential Regulation Authority (APRA), Australian Securities and Investment Commission (ASIC) and Australian Transaction Reports and Analysis Centre (AUSTRAC). In New Zealand, AMP Wealth Management's regulator is the Financial Markets Authority (FMA). Through our international business, AMP Capital, our investment activities are also subject to oversight by international regulators including, for example, regulators in the European Union and United States.

AMP also engages with industry bodies more broadly, including as an active participant in multiple industry associations such as the Association of Superannuation Funds of Australia (ASFA), the Australian Banking Association (ABA), the Financial Services Council (FSC), the Alternative Investment Management Association (AIMA), the Australian Financial Markets Association (AFMA) and the International Swaps and Derivatives Association (ISDA).



2021 at a glance

AMP contributed cooperatively and constructively to the regulatory, policy and legislative landscape by:

 ENGAGING with the Australian Government's legislative changes, including Your Future, Your Super reforms and the Retirement Income Review	 IMPLEMENTING legislative and regulatory changes from the Financial Services Royal Commission	 WORKING with supervisory teams from financial services regulators	 ADDRESSING historical matters and regulatory action, including by completing or undertaking appropriate remediation where required
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ALIGNED SDG



Regulatory and legislative change approach

We monitor regulatory and legislative changes and engage in important discussions on the potential outcomes for banking, superannuation, retirement incomes, life insurance, financial advice and asset management.

In 2021, we contributed to many of these important policy and regulatory developments, including:

- **Financial Services Royal Commission:** AMP contributed to consultations on Royal Commission-related recommendations, legislation, and regulation on items such as the Compensation Scheme of Last Resort, APRA Prudential Standard CPS 511 Remuneration, Strengthening Breach Reporting, and the 2022 Quality of Advice Review.
- **Retirement Income Review:** Continuing AMP's contribution to the Government's Retirement Income Review, we participated in consultation on the Retirement Income Covenant.
- **Product Design and Distribution:** AMP engaged with industry bodies on compliance with the Product Design and Distribution Obligations legislation.
- **Budget measures:** AMP assessed the impact of the Government's 2021 Federal Budget measures, including the removal of the minimum income threshold

for the superannuation guarantee, changes to the home downsizer scheme, and changes to the voluntary contributions work test. AMP also provided customers and advisers with resources via online webinars.

- **Your Future, Your Super:** AMP continued to assess the impact of the Government's Your Future, Your Super reforms and advocated for enhancements with legislators.
- **Banking Code of Practice:** AMP collaborated with other industry participants through the ABA to respond to the recommendations of the 2021 Review of the Banking Code of Practice.
- **Authorised Deposit-taking Institutions (ADI) Capital Framework Revision:** AMP contributed to APRA consultations on reforms to the ADI capital framework.
- **FASEA Standards:** AMP worked with the FSC to contribute to consultation on the FASEA standards, particularly with regard to managing conflicts.
- **ASIC CP350 – Remediation:** AMP worked with industry bodies to refine the most recent draft of ASIC's updated regulatory guidance in relation to remediation for Australian Financial Services licensees.
- **ASIC CP332:** Promoting access to affordable advice for consumers: AMP made a submission to ASIC to contribute to the discussion on reforms to the regulatory framework for the provision of advice.

Royal Commission recommendations implementation

AMP continues to implement changes to address the 76 recommendations from the Royal Commission into Misconduct in the Banking, Superannuation and Financial Services Industry, which is tracked by AMP through 102 measures. Of the 102 measures, 35 are not directly applicable to AMP as they relate to regulators or other industry changes.

As at the end of 2021, AMP has implemented 45 measures. 22 initiatives remain in progress, of which 6 are on track to be completed over 2022, with 16 items under 'watch', partly attributable to delays in the final passing of legislation in 2021 or output of a future regulatory review.

Royal Commission recommendations related measures

	2021	2020
Total measures applicable to AMP (67 out of 102) ¹	67	78
Complete	45	10
In progress	22	36
Legislation in consultation	0	32

¹ Total measures applicable to AMP in 2020 have been restated to 67 due to changes in classification of initiatives.



REGULATORY AND LEGISLATIVE ENVIRONMENT

International regulatory change

AMP operates in several jurisdictions globally, primarily through our asset management business AMP Capital. Each jurisdiction has different requirements, which continue to evolve. The AMP Capital Enterprise Risk Management team monitors and assesses global regulatory change for impacts on our business. The team includes a network of jurisdictional risk and compliance professionals located in our global offices who assist to understand the impacts of regulatory change and support implementation change activity where required.

AMP Capital is also an active member of several global industry bodies and committees which support us in understanding and meeting changing global regulatory obligations.

In 2021, key activities included:

- Executing on plans to transition away from the use of the London Inter-bank Offered Rate (LIBOR).
- Implementation of the investment firms prudential regime (IFPR) in the UK.
- Facing into foreign direct investment rules put in place in response to growing global national security concerns.
- Ensuring compliance with new individual accountability and conduct rules in Singapore.

Regulator engagement

In 2021, AMP updated its Regulator Engagement Policy and Procedures to drive better coordinated, higher quality and more timely engagement with our regulators, and to reflect the new Strengthening Breach Reporting regime.

AMP has a dedicated Regulatory Relations team, that manages regulatory relations across AMP by providing oversight, review and challenge on material regulatory interactions. The team also acts as a primary point of contact for regulators and provides data to assist AMP in meeting regulatory commitments.

AMP has worked constructively with the supervisory teams at ASIC, APRA and AUSTRAC, and attended over 230 regulatory meetings in 2021.

This approach has driven greater transparency, as well as improved the quality and timeliness of our regulatory commitments and interactions.

Regulator monitoring

	2021	2020	2019
Regulatory commitment ¹	900	1,090	1,346

¹ Includes activities requested by regulators or activities we have advised we will complete. This number does not include commitments relating to litigation matters nor the demerger.

Governance, Risk and Compliance (GRC) system

AMP has a central GRC system to raise and manage incidents, issues, breaches, risks, controls and compliance obligations. The system utilises technology and data analytics to provide reporting and insights into AMP's Compliance and Risk Management Frameworks. This platform provides a clearer view of the events and potential problem areas which create risk for AMP, and the activities we undertake to control and manage those risks.

In 2021, AMP further invested in this system to enhance obligations modules, licence management for regulated roles in the organisation and support tracking of adviser status. Updates to the system were also implemented to meet the new ASIC breach reporting regime which came into effect in October 2021.

Political donations

AMP does not make direct donations to political parties in Australia. AMP does participate in various political party forums to maintain dialogue and contribute to better policy outcomes for our customers and stakeholders.

Addressing historical matters and regulatory actions

AMP has been addressing several historical matters raised at the Financial Services Royal Commission and elsewhere, and since 2018 has taken action to strengthen controls, accountability and processes, improve compliance and risk management, and remediate impacted customers.

While these matters are largely historical and AMP has either completed or is in the process of undertaking remediation, we continue to transform our business and governance to continually improve our standards.

In 2021, AMP acknowledged two civil penalty proceedings commenced by ASIC in the Federal Court concerning allegations of historical breaches. One was in relation to the charging of Plan Service Fees, a matter that AMP self-reported to ASIC, and remediated in 2019, and the other involved the deduction of insurance premiums and advice fees from the accounts of deceased customers, which was also self-reported to the regulator, and remediated in 2019.

AMP's Superannuation Trustees (AMP Superannuation Limited and N.M. Superannuation Proprietary Limited) entered an enforceable undertaking (EU) with APRA for historical matters in the Superannuation business. APRA has acknowledged that AMP has addressed and completed remediation for several matters. One further matter is currently in the process of being remediated and AMP is revisiting its remediation approach in relation to another matter. At the completion of this EU, AMP envisages that all outstanding matters referred to APRA by the Financial Services Royal Commission will be concluded.

Future outlook

2022 will be another year of significant regulatory and legislative change as AMP:

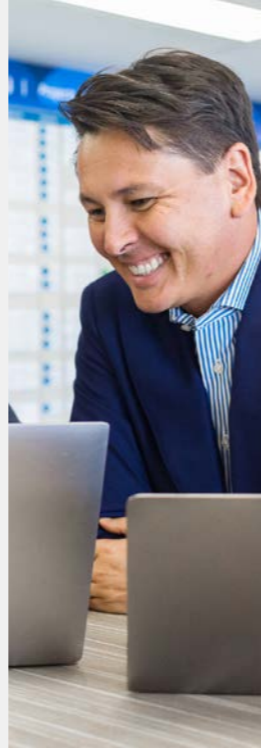
- Works constructively with the governments, regulators, advisers, trustees and other bodies to ensure that as the Government's significant legislative agenda is implemented, the outcomes are clear, simple and meet the best interests of customers.
- Ensures that a client and member centric approach is taken to improve outcomes.
- Invests further in the GRC system to enhance the current modules to address other focus areas, including licence management.
- Continues to implement and complete measures arising from the recommendations of the Royal Commission.

Digital disruption and security

Digital transformation is fundamentally shifting how financial service providers compete globally and serve customers. Restrictions due to the ongoing COVID-19 pandemic have also changed the way customers and employees expect to engage with businesses and their finances.






These technological changes enable us to improve our customer experience, operational effectiveness, and strategically position AMP for the future. AMP has been uplifting its online tools and automating decision making to enhance customer experience and access to services, supported by cloud-based infrastructure services.

Increased digital access also comes with new and greater exposure to cyber security and privacy threats, with the potential to impact operational and financial sustainability. AMP maintains a cyber defence and privacy capability to continually address and adapt to evolving cyber threats and the increasing focus from regulators. AMP conducts its activities in line our [Privacy Policy](#), available on our website.



2021 at a glance

AMP continued to invest in technology and digital capabilities to enhance customer and member experience and provide access to information in adviser and broker distribution channels. These include:

 ENHANCING decision-making processes and turnaround times for AMP Bank	 PROVIDING customers centralised access to data on the AMP website, such as AMP's COVID-19 Support Hub	 ACCELERATING AMP's migration to the cloud	 TRAINING employees and improving cloud-related capabilities through The Cloud Academy in partnership with Amazon Web Services (AWS)	 STRENGTHENING our cyber and information security capabilities in a rapidly developing threat environment
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ALIGNED SDG



COVID-19 Support

The COVID-19 Support Hub on our website is for AMP and non-AMP customers and contains information on managing different financial scenarios and guides users to the broad range of assistance available from the government and the financial sector, including AMP.

Following its launch in 2020, AMP's Facebook Messenger bot provided assistance to those seeking financial help and information on COVID-19. The bot asks users a series of questions and then, based on their answers, directs them to the information they need on AMP's COVID-19 Support Hub.

In response to government restrictions on accessing the office and workplace due to COVID-19, we provided continued support to more than 95% of our workforce to work remotely. Our ongoing, proactive cloud investment has ensured no impact, or loss of service, while enhancing services, for AMP's customers and employees.

Online tools and experience - MyAMP

MyAMP is a one-stop online wealth-management technology for banking, tracking cash flow, budgeting, reviewing and changing super and insurance arrangements, and accessing investment research. Over 500,000 customers use MyAMP to better manage their finances.

MyAMP's features include:

- Viewing statements and accounts online
- Managing personal details, contact details and communication preferences
- Transacting on Superannuation and Bank accounts
- Generate personalised Superannuation reports
- Access to news, education, simulators and calculators
- Viewing AMP and non-AMP accounts and transactions, including bank, credit card, loan, super and investment account details from over 200 financial institutions
- Tracking spending and generating graphs based on customer spending, savings and cashflow.

User numbers

	2021	2020	2019
Total users for MyAMP Web ¹	526,045	512,640	489,082
Total users for MyAMP App	190,187	160,677	131,284

¹ From 2021, AMP has updated this metric from total registrations to count the first time a customer logs into the MyAMP App or MyAMP Website. Historic data has been restated for year-on-year comparison.

Online tools and experience - ClientHUB

We're committed to supporting advisers with high-quality technology solutions. ClientHUB is the key technology platform that links AMP, the licensee, with all our advisers and their clients.

The clientHUB is an ecosystem of leading technologies, providing digitally enabled advice experience for clients and advisers on one platform. Underpinned by Salesforce technology, clientHUB provides an integrated practice management system. Our integration with XPLAN financial modelling tools connects us to a market leader in developing and producing quality advice in an efficient way.

In 2021, we announced a partnership with Creativemass to continue to deliver a high-quality technology solution for our advice network, building on the foundations of ClientHUB, and enhanced with Creativemass's WealthConnect platform. We have delivered a series of technology updates throughout 2021 to enhance the usability of the platform and provide additional features.

These upgrades have led to reduced processing times, supported advisers meeting Continuing Professional Development (CPD) requirements and assisted client information requests to meet regulatory requirements.

Cloud technology and implementation

AMP has commenced a number of infrastructure cloud transformation programs that will deliver the latest modern capabilities and services. We have transitioned several technology services to enable a progressive move from traditional data centres to the cloud. This significant investment in cloud services will enhance efficiency and agility, drive simplification, improve customer and employee experience, foster innovation, and accelerate speed-to-market for our products and services, whilst improving our risk and control compliance. The program has delivered cost reductions, which will continue to be realised through 2022.

We are also investing in our people and launched The Cloud Academy to train our people and enhance our cloud-based capabilities. Over 500 employees have advanced their skills and knowledge through a wide range of cloud training courses since June 2020.



DIGITAL DISRUPTION AND SECURITY



AMP Bank

In 2021, AMP Bank has rolled out several enhancements to its service offering as it maintains its top three position in the market for lender turnaround times, in the most recent Broker Pulse survey run by Momentum Intelligence. AMP Bank has invested in digitalisation and automation over the past 24 months to strengthen services to customers, brokers and advisers. These include:

- Uplifting the Bank’s automated credit decisioning capability, resulting in faster and more consistent approvals.
- Enhancing approval letters by including more dynamic and specific approval conditions to ensure relevance to a customer’s unique financial needs.
- Upgrading functionality of how supporting documents are submitted, improving quality, which drives greater back-end processing efficiency.
- Enhancing e-signature capability to speed up the process for both customers and staff.

Information and cyber security

Cyber security threats continued to evolve throughout 2021 with a series of highly coordinated attacks impacting the Australian economy. Ransomware attacks, in particular, hit small businesses and big corporations alike. There has also been continued exploitation of the pandemic environment and hybrid working arrangements. Supply chain attacks have increased significantly throughout 2021 as criminals explored new ways to infiltrate organisations.

AMP has further strengthened its cyber security through continued investment in its cyber transformation program. In 2021, AMP’s dedicated cyber security team:

- Launched the Cyber Defence Centre, providing 24/7 monitoring, analysis response and threat intelligence capabilities .
- Enhanced risk management approaches with third- party service providers, including assurance over material and high-risk service providers.
- Continued focus on Cloud and data security, allowing AMP to host and run critical workloads in the cloud environment.
- Strengthened protection of critical internet-facing applications ensuring that our services are available for our customers, employees and stakeholders.

Protecting privacy

Protecting the privacy of personal information we collect and use is paramount to maintaining trust with our customers, employees and other stakeholders. The Privacy team, in the Group Integrity Office, is responsible for managing our privacy program, setting policy and standards, advising Line 1 teams on privacy risks, maintaining privacy awareness and monitoring compliance.

We also ensure that all AMP employees and contractors complete mandatory privacy training (mandatory training is outlined in the [Ethical Conduct and Governance](#) section).

Cyber security awareness and training

In 2021, employees continued to engage with mandatory and supplementary Cyber Security Awareness training made available across the organisation. The two cyber security focused mandatory training modules had very high completion rates, with continued learning and development supported through 30 educational seminars, many targeted at new starters, to upskill and hear from industry experts.

The benefit of these educational initiatives was clear with the average click rate on monthly phishing simulation emails reducing significantly in 2021, well below industry averages, as well as significant rise in reporting rates. The Cyber team continue to find new ways to help employees feel safe and secure online, focusing on issues of cyber security, privacy and data protection.

Reporting breaches

Data breaches involve the loss, unauthorised access or disclosure of personal information. This can result from an error by a company, a third party or malicious attacks/acts by external or internal parties.

AMP takes privacy, data security and our obligations to report and notify customers, employees and other stakeholders very seriously. We have comprehensive incident response and data breach response plans, which ensures a proactive approach to unauthorised access, disclosure or loss of personal information.

During 2021, we notified the Office of the Australian Information Commissioner (OAIC) and the Office of the New Zealand Privacy Commissioner of five data breaches that impacted a small number of our customers. The causes of the data breaches included three cases of human error and two cases of malicious attacks/acts by a known external party, an employee and a former adviser. In all cases, we notified impacted individuals, and took steps to protect individuals from harm and prevent future data breaches.

Cyber security and privacy	2021	2020	2019
No. of data breaches reported ¹	5	5	3
Malicious attacks	2	3	2
Human/system error	3	2	1

¹ Breaches reported to the Office of the Australian Information Commissioner, the Office of the New Zealand Privacy Commissioner and the UK Information Commissioner’s office.

AMP Capital Real Estate Asset Technology



In 2021, AMP Capital has invested in the latest smart building technologies to lower operational costs, improve building performance and tenant comfort across its managed real estate portfolio, including iconic assets such as 33 Alfred Street, Macquarie Centre in Sydney and Collins Place in Melbourne. Underpinned by digital building technology, over 380,000 sensor data points are captured and analysed every 15 minutes, with insights used by operations teams to detect problems with equipment performance and identify improvements through repairs and maintenance.

Autonomous heating, ventilation and air-conditioning (HVAC) controls have also been deployed across the portfolio, leveraging artificial intelligence to reduce run times and extend the useful life of equipment. Early results show up to a 15% reduction in base building energy consumption and costs.

Future outlook

Digital innovation and security remain high priorities for AMP and key activities for 2022 include:

- Continuing to enhance the digital experiences for our customers across our website and My AMP.
- Continuing to update our wealth management technology platforms to improve functionality and experience for advisers and clients.
- Rolling out clientHUB to more advice practices in our network and providing further feature enhancements to improve the advice experience for clients and practices.
- Implementing the cloud infrastructure transformation programs and capabilities across our business units.
- Expand the Cyber Defence Centre capabilities, through new automation, threat intelligence and breach attack simulation capabilities.
- Training employees on appropriate privacy and data security protocols and strengthening access management controls.



PEOPLE AND PARTNERS

Ethical conduct and governance

Community trust in financial institutions is essential in maintaining the confidence of our customers, employees, investors and regulators in the stability and equity of the financial system. Conduct and governance issues in recent years have meant AMP, and the financial services sector more broadly, receives a high level of scrutiny on these matters from a range of stakeholders.

AMP is committed to building trust by taking action across multiple areas to improve our culture, strengthen governance systems and ensure executive management and employees understand their accountabilities and act in an ethical and responsible manner.

AMP's Code of Conduct is our commitment to acting ethically and responsibly. It outlines the minimum standards of behaviour, decision making and our expectations for the treatment of employees, customers, business partners and shareholders.

We are focused on ensuring we always act in the best interests of our customers and exceed the expectations of the community. We have made good progress across a range of actions to address conduct-related issues and we are committed to providing transparent and meaningful reporting on these issues. We have more to do and we are committed to continual improvement and transparency to ensure we live up to our own standards and those of our stakeholders.

ALIGNED SDG



2021 at a glance

In acknowledging the need to uplift our focus on culture, conduct and customer remediation, AMP has continued to strengthen governance systems by:

ENHANCING

processes and disclosure of conduct-related issues through internal and external avenues, including ensuring appropriate consequences are applied for substantiated misconduct



STRENGTHENING

the Risk Culture and Capability program, ensuring employees are equipped to support effective risk management through training and awareness



IMPLEMENTING

More than **95%** of actions set for 2021 in response to the workplace conduct and culture review conducted in 2020

COMPLETING THE CLIENT ADVICE REMEDIATION PROGRAM

having paid **90%** of remediation payments as of 2021-year end

Workplace conduct review

In 2020, AMP commissioned a diversity, inclusion and culture consultancy firm to complete an external review of its workplace culture and conduct. This was in response to employee and stakeholder feedback to the appointment of the AMP Capital CEO in 2020 and other concerns about workplace culture and conduct.

The review included an assessment of policies, process and frameworks, a review of historical conduct case data, 1:1 interviews with leaders, an all-employee survey and employee focus groups. At the conclusion of the review, a management action plan with 69 initiatives was developed. In 2021, more than 95% of the actions set for the year were implemented, with the remaining actions expected to be delivered in 2022.

Conduct and Consequence Management

AMP's Consequence Management Policy provides a framework for leaders to make fair, consistent and considered decisions regarding consequences for breaches of the Code of Conduct, AMP policy or other types of misconduct. The policy applies to all AMP employees, directors and officers and includes a set of principles for determining appropriate consequences for different categories of breaches or misconduct.

The Consequence Management Committee continued to operate in 2021 as the primary governance mechanism for reporting and monitoring consequences. Changes were made to the role and membership of the Committee during 2021 to enhance effectiveness, increase Executive Committee accountability, and incorporate direct involvement of the Group Chief Executive Officer.

AMP has enhanced internal and external transparency on conduct issues, including:

- Quarterly reporting to the Consequence Management Committee and Board Risk Committee.
- Regular communication with employees regarding key insights, statistics and trends.
- Introduction of a quarterly Culture Dashboard to encourage discussion, debate, reflection and drive improvement.
- Sharing initiatives and progress against the Management Action Plan with clients and shareholders globally.

In 2021, AMP recorded 134 complaints or concerns alleging misconduct received through our People and Culture team, compared to 172 in 2020. 99 cases were substantiated, and consequences applied. The reduction in case numbers in 2021 is potentially a lead indicator of cultural change driven by senior leadership changes as well as other initiatives such as an awareness campaign about the company's Information Management policy.

ETHICAL CONDUCT AND GOVERNANCE

Workplace conduct

	2021	2020
Total number of alleged misconduct cases ¹	134	172
Number of substantiated misconduct cases	99	88
– Minor misconduct substantiated	46	42
– Material misconduct substantiated	53	46
Consequences applied for misconduct cases		
– Management outcome ²	70 ⁴	47
– Management and remuneration outcome ³	19	17
– Terminations	6	24
Cases not substantiated (eg lack of evidence, resolved informally between individuals or complaint withdrawn)	35	84

¹ Includes cases managed by AMP's People and Culture and Employment Legal teams. Cases relating to New Zealand are not included in the first half of 2021 and cases relating to SuperConcepts are not included in the first quarter of 2021.

² "Management outcome" includes written and verbal warnings, cautions, counselling and reminders of obligations.

³ "Remuneration outcome" means a reduction to variable remuneration or incentive.

⁴ There were an additional four cases in which the individual resigned or exited prior to an outcome being communicated.



Preventing and responding to sexual harassment

Following the release of the Australian Human Rights Commission [Respect@Work National Inquiry Report](#) in 2020, it is clear that organisations should adopt proactive and systemic approaches to preventing and responding to workplace sexual harassment.

As a large employer, AMP recognises its own role in addressing these issues for our employees and the broader community. AMP has introduced a range of measures throughout 2020 and 2021 to directly address our own policies, process and the underlying cultural drivers of gender inequality and power disparities. Addressing causes of workplace misconduct and sexual harassment remain complex and we are committed to continued improvement in line with emerging government and industry guidance for organisations.

The changes AMP has implemented include:

- Strengthening our workplace relations capability and expertise to manage complaints and allegations, including embedding a people-centric, trauma-informed approach to case management.
- Increasing the number of formal, informal and anonymous channels through which employees can raise concerns.
- Enhanced mechanisms for data collection and improving internal reporting on matters.
- Enhanced wellbeing support for all people involved in workplace investigations and other conduct cases (including EAP and direct support from Health, Safety and Wellbeing Team).

These changes are in addition to the measures implemented to create a diverse and inclusive culture, including gender diversity targets, inclusive leadership training and professional mental health support mechanisms to address the drivers of gender inequalities and power disparities. These are outlined in the [Human Capital Management](#) section of this report.

As part of our commitment to implementing industry recommendations on transparency, AMP is disclosing metrics regarding sexual harassment matters for the first time. In 2021, there were five matters involving allegations of sexual harassment addressed by the organisation, the same number as in 2020. In 2021, one matter was substantiated, compared to two substantiated matters in 2020, all of which saw formal warnings applied. Additional consequences were applied as appropriate, including additional training and adjustments to variable remuneration. In 2021, all cases were specifically approached with a focus on the prioritisation of wellbeing, safety and support for people, and respecting the preferences of those impacted, as much as possible.

Sexual harassment matters

	2021	2020
Sexual harassment matters informally and formally addressed by AMP	5	5
– Matters substantiated	1	2
– Matters not substantiated (eg lack of evidence, resolve informally between individuals or complaint withdrawn)	4	3
– Substantiated sexual harassment matters resulting in formal warning and additional consequences as appropriate, including additional training and adjustments to variable remuneration	1	2

ETHICAL CONDUCT AND GOVERNANCE

Group Integrity Office

AMP's Group Integrity Office (GIO) comprises the following functions:

- Integrity Investigations (including the Whistleblowing Program)
- Group Fraud
- Risk Culture and Capability
- Privacy
- Governance, strategic and financial risk

The GIO is critical to ensuring we uphold the integrity of AMP by having independent mechanisms for people to speak up and raise concerns, establishing measures to prevent and effectively manage fraud, privacy and other risks as well as for training and awareness.

Whistleblowing

AMP's Whistleblowing Program provides a secure channel for people to report concerns relating to AMP. It provides assurance that concerns will be reviewed and/or investigated in an objective, independent and confidential manner, with appropriate corrective action taken where concerns are substantiated.

In 2021, we conducted updated face-to-face training for senior leaders and e-learning for all employees, as well as ongoing awareness raising activities and investment in our Whistleblowing Program. 25 whistleblowing matters were raised. This represented a decrease compared to 2020, noting that there were a higher than usual number of disclosures in 2020. The Whistleblowing Policy is accessible to all current and former employees, contractors, service providers, associates and officers of AMP.

AMP whistleblowing

	2021	2020	2019
Issues raised through AMP Whistleblowing Program	25	69	37
– Issues directed to the Your Call external, confidential service	11	29	20
– Issues directly received by our Whistleblowing Program ¹	14	40	17
– Issues investigated that were not substantiated	20	36	20
– Issues substantiated, resulting in appropriate consequences	5	21	10
– Issues investigated that were related to corruption	0	0	0
– Issues still under investigation	0	8	5
– Issues not investigated as subject to other business investigation	0	4	2

¹ Figure includes issues received by our Whistleblowing Program via disclosures received direct to eligible recipients.

Strengthening risk culture

A strong risk culture is a key enabler of effective risk management. There is a dedicated team in the Group Integrity Office who designs and executes the three-year risk culture strategy and maturity model, partnering with business leaders to uplift risk behaviours, capability and awareness. In 2021, there was a focus on initiatives to strengthen AMP's risk culture, including those where:

- A strong tone from the top is demonstrated.
- Meaningful, consistent communication is evident.
- Knowledge of risk management is actively applied by most people.
- Demonstration of good risk behaviour is often recognised and rewarded.
- Consistent outcomes are applied for poor risk behaviour.
- Improved data/risk reporting supports decision making.

Mandatory training

AMP employees and advisers are required to complete regular mandatory training modules to ensure ongoing compliance with relevant laws, regulations, policies and practices required of AMP employees. Content includes topics such as the AMP Code of Conduct,

provision of personal and financial advice, preventing financial crime, anti-bribery and corruption, workplace health and safety, information security, privacy, ESG and modern slavery. In 2021, completion rates remained high at 99%.

Mandatory training

	2021	2020	2019
Employees completing mandatory training, including Code of Conduct and Consequence Management ¹	99%	99%	98%

¹ Completed by individuals on the AMP payroll, including employees and time and materials contractors.

Anti-bribery and corruption

AMP has an Anti-bribery and Corruption (ABC) Policy, which is approved by the AMP Limited Board Audit Committee and communicated to all employees. It defines our approach to prevent, detect and deter bribery and corruption and comply with relevant legislation in all jurisdictions in which we operate and/or have an active registration or licence.

It identified and compensated clients who have suffered loss or detriment as a result of:

- Inappropriate advice from their adviser; or
- Where clients have been charged an advice service fee without the provision of financial advice services (or insufficient evidence of the provision of financial services).

Remaining payments relate to clients that paid their ongoing advice fees via third-party products. AMP is working with these providers to facilitate payment as soon as possible, with a target completion date of Q1 2022.

Client advice remediation

The client advice remediation program has completed 100% of reviews and more than 90% of remediation payments as of FY21. This mandatory program followed findings at the Royal Commission.

The final cost of the remediation program will be approximately \$828 million, 6% above original estimates.

AMP has undertaken or is in the process of remediation activities related to its Superannuation business, related to regulatory actions. These are detailed in the Regulatory and Legislative Environment section of this report.

Future outlook

Conduct, accountability and creating a strong risk culture remain key priorities for AMP as part of AMP's cultural transformation. Key future activities will focus on:

- Refining our conduct and consequence management frameworks, in line with emerging best practice standards and employment and safety laws.
- Progressing further initiatives and action on responding to and preventing workplace misconduct including sexual harassment, with a focus on education/knowledge, culture, policies, reporting pathways and complaint handling, and continued transparency.
- Further implementing the risk culture plan through employee training and awareness and embedding risk accountabilities into AMP's performance management framework.
- Completing the final payments of our client advice remediation program.

Human capital management

As a financial services company, we understand that our people are our most important asset to create value and deliver for our customers and members. We are committed to building an inclusive, high-performance culture that reflects the communities we serve and enables our people to contribute their best every day.






AMP also recognises the importance of talent attraction and retention in an increasingly competitive labour market, as people adapt to remote working and a world impacted by COVID-19.

2021 has been a period of change as AMP becomes a simpler business, with the planned demerger and other announced changes (detailed in the About AMP section of this report). As part of these changes, we have commenced a program of extensive engagement with our employees about purpose, values and culture and plan to announce these ahead of the demerger in 2022.



2021 at a glance

In 2021, we continued to support our employees and workforce by:

 <p>INTRODUCED 40:40:20 GENDER DIVERSITY TARGETS</p> <p>and met these targets at the Board, middle management and overall workforce</p>	 <p>PLANNING THE TRANSITION OF THE INCLUSION TASKFORCE ESTABLISHED IN 2020</p> <p>to a permanent Inclusion and Diversity Council</p>	 <p>PROVIDING NEW ONLINE TRAINING COURSES</p> <p>focusing on inclusive thinking and behaviours</p>	 <p>LAUNCHING LINKEDIN LEARNING TO ALL EMPLOYEES</p> <p>to upskill, reskill and explore professional interests to support their growth and learning</p>	 <p>SUPPORTING HEALTH AND WELLBEING OF EMPLOYEES</p> <p>through personalised coaching and counselling services, mental health services and physical safety protocols at our office locations to address challenges of COVID-19</p>
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ALIGNED SDG



Inclusion and diversity

AMP is committed to creating an inclusive culture that enables our diverse global workforce to contribute their best every day. Our commitment to an inclusive culture is also outlined in our [Inclusion and Diversity Policy](#).

The Inclusion Taskforce, initially established in 2020 to accelerate AMP’s culture transformation, will transition to an Inclusion and Diversity Council in 2022. This council will be made up of employee representatives from across the organisation. In addition to the Council, AMP’s approach is supported by a range of employee resource groups, including business unit working groups, our Pride network ([AMProud](#)) and our [Reconciliation Action Plan \(RAP\)](#) Committee.

In 2021, we continued to support our leaders and broader workforce in developing the skills it takes to be an inclusive

leader and colleague by launching an online foundational inclusion skills program to all employees. These modules cover topics including the case for inclusion, unconscious bias and how to be inclusive. As of 31 December 2021, 25% of employees had completed this training. We also partnered with an external leadership agency to run workshops with leaders across the company, focused on practical skills to foster an inclusive culture in their teams.

To measure the impact of these initiatives, AMP introduced an Inclusion Index measured against a set of globally benchmarked questions on inclusion, to understand the experience of inclusion and diversity in every part of the business. The index is measured as part of the all-employee pulse survey. In 2021, the index increased to 74 from 72 in 2020.

Inclusion Index

	2021	2020
Score	74	72

Gender diversity

In 2021, AMP introduced updated gender diversity targets, adopting a 40:40:20 approach to gender representation where the aim is to have 40% women, 40% men and 20% open (male, female, non-binary or other genders) at all levels of the organisation. In 2021, across its total workforce, AMP maintained an approximately equal gender balance of 50% female and 50% male employees. AMP also met targets across middle management (43% female representation) and Board (50% female representation).

At the ‘Head of’ level, 36% were women, indicating that a continued focus on diversity is needed to ensure targets are met at all levels of leadership in future years. To achieve this, we remain focused on developing female talent, targeting gender balanced short lists and increasing female representation on succession plans.

Gender targets	2021-2025 target (%)	2021 target (%)	2021 (%)	2020 (%)
AMP Limited Board		40	50	43
Senior Executives ¹		40	39	37 ⁴
Head Of ²	40:40:20	40	36	
Middle management ³		40	43	44
Workforce generally		40	50	50

1 Executive management roles are generally one to two reporting layers below the CEO and represent the top 1% of the organisation. People in these roles typically lead discrete functions and are responsible for making strategic decisions for those functions. They generally have the title Group Executive or Director.
 2 Head of roles are generally between two to four reporting layers below the CEO and represent the next 6% of the organisation. People in these roles generally report to the Executive management and are involved in tactical/strategic decision making or have specialised and high value skills. Generally used position titles include Head of, Senior Manager.
 3 Middle managers are generally between three to four reporting layers below the CEO and represent the next 28% of the organisation. People in these roles typically report to Head of roles and are involved in operational decision making. They have a wide range of titles, including Manager and Lead.
 4 Executive management and Head of roles were reported on together as Senior executives from 2015-2020. There was 37% female representation at the Senior executive level in 2020.



HUMAN CAPITAL MANAGEMENT

Supporting gender equality

AMP also has a range of policies and processes in place to support gender equality in the workplace. These include:

- Gender equality considerations in our recruitment, retention, promotion and remuneration management processes.
- Providing a flexible working environment through a range of leave and working options, including carers leave, flexible hours of work, job sharing, remote working and purchased and unpaid leave.
- Parental leave policy, which was updated in 2021 to remove distinctions between primary and secondary careers, reducing the eligibility period from 12 to 6 months and increasing superannuation contributions during unpaid parental leave from 38 weeks to 24 months (less any period of paid leave).
- Domestic and family violence leave and support measures for employees experiencing violence.
- Providing guidance during remuneration reviews to identify gender pay anomalies to inform remuneration changes as part of AMP's commitment to gender pay equity.

AMP also provides annual information to Australia's Workplace Gender Equality Agency (WGEA).

Living wage

In New Zealand, everyone working at AMP, direct or contracted, receives the living wage (NZ\$22.75) or higher, which reflects the real cost of living in New Zealand. We recognise that there are still many New Zealanders who don't receive a fair day's wage for a fair day's work. As a founding member of the Living Wage Principal Partner Council we continue to encourage more employers in New Zealand to join the movement.



LGBTQ+ diversity: AMProud

Open to everyone at AMP, AMProud is a community group recognising lesbian, gay, bisexual, transgender and queer/questioning (LGBTQ+) employees and allies.

In 2021, AMProud continued employee advocacy by acknowledging key LGBTQ+ days of significance, including Mardi Gras, Transgender Awareness Day, Wear it Purple Day and IDAHOBIT Day. Virtual and in-person events, where permitted, were held throughout the year for employees to connect and celebrate with peers.

As a member of Pride in Diversity, AMProud also delivered a series of tools and resources, focused on correct pronoun usage, removing HIV stigma and support for LGBTQ+ staff working remotely during COVID-19.

AMP is Rainbow Tick accredited in New Zealand, which demonstrates that our workplaces welcome sexual and gender diversity.

Employee satisfaction

AMP tracks employee satisfaction through an all-employee pulse survey every two months, which measures employee satisfaction, providing an 'eSat' score. Leaders and teams use the results of these regular surveys to hear from employees and establish actions plans to enhance employee experience and respond to feedback.

As of 31 December 2021, AMP's group-wide eSat score improved from 67 to 71. Our people continued to show resilience in the face of a global pandemic, embracing remote working and new ways of collaborating online to deliver for our customers and members.

Employee satisfaction

	2021	2020	2019
AMP employee eSat score	71	67	68

Turnover

Following a period of subdued employee turnover in 2020 at the beginning of the COVID-19 pandemic, 2021 saw an increase in our turnover in an increasingly competitive employment market. Globally, employers have also seen an increased appetite for career changes amongst employees. While AMP voluntary turnover has followed

average industry turnover in recent years, it increased above industry average between May to October 2021, before returning to more typical levels in the final months of the year. This outlier period of increased turnover resulted in an overall 23.9% voluntary turnover for the 12-month period to 31 December 2021.

Voluntary turnover (yearly average)

	2021	2020	2019
Total male employees	25.4%	10.9%	13.9%
Total female employees	22.5%	10.9%	13.7%
Australia	24.1%	10.7%	13.5%
New Zealand	15.6%	14.7%	19.3%
International	19.9%	4.6%	7.8%

Talent attraction and retention

2021 presented an increasingly competitive market given the ongoing pandemic and stronger economic conditions. To attract and retain talent, AMP continues to:

- Develop an employer brand and attraction strategy for internal and external audiences.
- Provide opportunities for internal candidates in roles across the organisation.
- Conduct ongoing talent reviews to build capability, develop careers and strengthen future succession across the organisation.
- Leverage AMP's award-winning graduate program to continue to develop quality graduate talent.
- Provide development opportunities including developmental planning, leadership coaching and opportunities for education and learning.



Building a culture of learning

To build a culture of learning and help all employees upskill and reskill, AMP introduced LinkedIn Learning to all employees during 2021. LinkedIn Learning provides employees unlimited access to a digital library of content, covering technical, business, leadership, software and creative topics.

The account activation rate among employees is 67% as of 31 December, which is well above the industry benchmark. A total of 3,088 hours of training was completed in the second half of 2021 by more than 2,600 employees.

The People and Culture team held monthly virtual 'learning lounge' sessions for employees to deep dive into a range of popular topics, including Inclusion and Diversity, Adapting to change and Achieving peak performance.

Training and development

AMP is committed to having a highly trained, skilled and motivated workforce and recognises that providing learning and development opportunities plays an important role in the employee experience.

AMP has mandatory training for employees (outlined in Ethical Conduct and Governance) and provides support for the professional development of advisers (outlined in Partners and Supply Chains). Our ongoing training and development is supported by virtual training and awareness sessions covering a range of topics from risk management, information security, privacy, mental health, modern slavery ESG and more.

AMP also has a Study Policy, which sets out how AMP will support employees in undertaking further study which is relevant to their current position. Support may be in the form of financial assistance or paid leave for an approved course of study. In 2021, 186 employees took approximately 5,800 hours of study leave.

HUMAN CAPITAL MANAGEMENT

Employee Health, Safety and Wellbeing

The COVID-19 pandemic has highlighted the important role that workplaces have in developing strong design and work practices to protect employees and address health, safety and wellbeing risks. In March 2021, AMP launched its We-flex policy, building on AMP's long-standing commitment to flexible work practices. The program gives our leaders and employees the autonomy to agree how, when and where work is done, in support of our inclusive culture and sustainable business outcomes.

In addition to the launch of We-flex and adoption of remote or hybrid working during the pandemic, AMP implemented

a number of health and safety controls to address the risk of workplace exposure to COVID-19. These include: limiting general workplace attendance, implementation of site-specific COVID-19 Safe plans (as per local legislation), the provision of facilities and signage which support hand hygiene, mask wearing (where applicable), social distancing and adequate ventilation, cleaning regimes with a focus on high touchpoint areas and amenities, consulting broadly with employees to identify better COVID-19 safe work environments, monitoring processes to ensure they remain effective, and ensuring information is communicated broadly and responded to in a timely manner.



Health, Safety and Wellbeing Program

As part of AMP's health, safety and wellbeing framework, a variety of integrated health and wellbeing services were delivered to our people throughout 2021 via the Into-GREAT program. The key focus areas of this program included supporting positive mental health and employee wellbeing, and providing the necessary tools, process and mechanisms to reduce the risk of psychological and physical harm.

A variety of services were delivered, including motivational keynote speakers, access to on-site health checks, flu vaccination vouchers, and 24/7 access to our Employee Assistance Program (EAP) services, and involvement in campaigns such as RU OK Day and Mental Health Month.

In addition, a range of educational seminars and workshops were delivered to employees with a specific focus on mental health awareness, management of change, coping and resilience, and healthy leadership. The 2021 program had over 7,500 engagements and resulted in an increase of four points to our 'wellbeing' index as measured by employee surveys, which increased from 71 in February 2021 to 75 in October 2021.



Mental Health First Aider network

We value the wellbeing of our employees and recognise the importance of prioritising mental health, particularly in a remote working environment. The Mental Health First Aid (MHFA) network joins 99 employees across the organisation who are passionate about mental health and wellbeing and open to taking an active role in supporting their peers. Each of these employees are accredited MHFA officers, with AMP supporting the training of 30 new members in 2021.

Throughout Mental Health Month in October 2021 we promoted the work of the MHFA network and shared helpful resources to employees. We will continue to invest in our MHFA network and formal support channels in 2022.

Future outlook

AMP continues to proactively respond to opportunities and challenges presented by market volatility and ongoing COVID-19 disruptions. There will be further change in 2022 as we complete the demerger of Collimate Capital, and create a simpler, purpose-led business.

Key focus areas include:

- Establishing a simple, fit-for-purpose operating model as AMP moves to demerger in 2022, as well as launching refreshed purpose and values and aligning performance and recognition.
- Continued progress on our Diversity and Inclusion approach, including establishing the refreshed Inclusion and Diversity council and driving an inclusive culture through training.
- Distributing a company-wide inclusion and diversity survey to get further information about our diverse workforce.
- Implementing a new Human Capital Management platform to enhance leader and employee experience enabled by digital applications, processes and controls.
- Uplift in leader and employee experience enabled by smart, simple, digital applications, processes and controls.
- Talent and leadership activities to strengthen and diversify our talent pipeline.

RECONCILIATION ACTION PLAN



Reconciliation Action Plan (RAP)


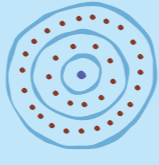
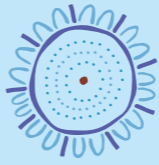
Since launching the AMP Innovate RAP in 2020, we are now more than halfway through our second RAP and have delivered on more than 60% of our commitments.

The Innovate RAP framework guides us to implement reconciliation initiatives over two years and outlines the actions for achieving the organisation's vision for reconciliation.

AMP's Innovate RAP vision is to empower and work collaboratively with Australia's First Peoples to promote financial wellbeing and implement reconciliation initiatives. Our aim is to develop cultural understanding, create opportunities for Aboriginal and Torres Strait Islander communities and proudly celebrate Australia's heritage.

As an organisation we are embedding the principles and purpose of reconciliation through educating, motivating, and inspiring our people within our sphere of influence.



Focus area	Aims	Achievements in 2021 ¹
Knowledge and respect 	<ul style="list-style-type: none"> Respect First Nations culture through Acknowledgement and Welcome to Country protocols Develop awareness and train employees through cultural awareness training Mark and celebrate Aboriginal and Torres Strait Islander cultures through key events such as National Reconciliation Week and NAIDOC 	<p>4,382 EMPLOYEES completed online cultural awareness training</p> <p>308 EMPLOYEES completed face to face cultural awareness training</p> <p>2,100 EMPLOYEES reached in online 2021 National Reconciliation Week campaign</p>
Relationships 	<ul style="list-style-type: none"> Partner and collaborate with like-minded organisations to improve outcomes for Indigenous Australians Identify and establish employment pathways for Indigenous Australians Identify opportunities to engage Indigenous owned businesses through our supply chain 	<p>\$470,000 IN GRANTS to Indigenous entrepreneurs and charities</p> <p>\$126,000 SPEND with Indigenous owned businesses across</p> <p>10 COMMERCIAL RELATIONSHIPS²</p> <p>Employee-led donation drives to Utopia and Bitjimi Aboriginal Communities</p>
Financial wellbeing 	<ul style="list-style-type: none"> Leverage our expertise to build financial capability and literacy for First Nations communities 	<p>INDUSTRY FIRST Corporate Yarning Circle engaging 50 ORGANISATIONS, including workplace superannuation clients</p> <p>Established Partnership with Big Super Day out (scheduled for 2022 subject to COVID-19 restrictions)</p>

¹ Achievements are for period September 2020 - August 2021, which align with 12 months reporting of AMP's Innovate RAP.

² To 30 June 2021.

Partners and supply chains

AMP has extensive relationships with partners and service providers throughout our value chain to deliver for clients, members, employees and the community. We recognise that every aspect of our value chain needs to meet community and legal standards, and we work to ensure these relationships align to our principles and values.

In Australian Wealth Management, we have an aligned advice network and important partnerships with external financial advisers. We share accountability with these networks to ensure customers receive professional and compliant advice that is in their best interests. AMP Bank also works with external brokers to provide competitive home loans to Australians in a highly competitive mortgage market.

Through our investment management activities, AMP also partners with a range of external fund managers as part

of the investment strategies of specific fund ranges, such as our MySuper range for superannuation members and investment options available on our platforms. These activities are outlined in [Customer Experience](#) and [Responsible investment](#) sections of this report.

We work collaboratively with our partners and service providers to evolve the strategies and processes in place to address material Environmental, Social and Governance risks and deliver value for our stakeholders.



2021 at a glance

AMP worked closely with our partners and service providers to continue to deliver for customers and members while managing the impacts of COVID-19. Some key actions included:



LAUNCHING A CONTEMPORARY ADVICE SERVICES MODEL

and strengthening the productivity, compliance, and professionalism of the advisers we license



SELLING OUR EMPLOYED ADVICE NETWORK

to a trusted partner in PSK Financial Services and continuing as an equity holder in the business



SUPPORTING PROFESSIONAL DEVELOPMENT OF ADVISERS

and ensuring advisers meet education requirements



WORKING WITH PARTNERS THROUGH THE SUPPLY CHAIN

to ensure ongoing services for our business, while addressing risks including information security and modern slavery



CONTINUING TO REFINE AND IMPROVE OUR SUPPLIER CODE OF PRACTICE

to reflect our expectations of suppliers and updated risk assessment processes, including for modern slavery



PUBLISHING OUR FIRST MODERN SLAVERY STATEMENT

under Australian legislation, covering actions taken in 2020 and developing our second statement for the 2021 reporting year

ALIGNED SDG



Contemporary advice service model

In 2021, AMP announced the introduction of a new service model with its aligned advice network, marking a new era for financial advice at AMP. The new model will be progressively introduced, giving advisers increased choice, flexibility and transparency with how they partner with AMP and how they continue to operate their business.

The contemporary approach includes three key components:

- 1 A new service proposition and fee model for advice practices, which has been competitively benchmarked against the industry and reflects the services offered. It includes a set of core services as well as user pay services. The new fee model will be phased in from 1 January 2022 to 1 January 2023.**
- 2 The release of institutional ownership of clients from AMP Financial Planning to advisers, with the ability to transfer clients out of the AMP network. This change will take effect from 1 January 2022.**
- 3 The conclusion of client register buy-back arrangements from 31 December 2021, with practice principals able to take advantage of current terms remaining in place until this date.**

Financial advice network

In 2021, we continued to reshape our advice model to build a more productive, compliant and professional network, with our overall number of advisers reducing as practices merged or exited the industry. During the year we completed over 160 practice transactions which included sales of advice practices, resulting in the transfer of over 5,000 service fee clients and 24,555 non-service fee clients to AMP-aligned advisers.

We continue to invest heavily in the quality of advice delivered by advisers. For example, we believe annual agreements best serve the interests of clients who seek advice over a period of time. The annual agreements require clients and advisers to explicitly agree on the services to be provided and fees paid in a 12-month period. In 2021, there were approximately 97,855 clients with annual advice agreements with AMP aligned advisers.

The number of aligned advisers in the network reduced to 1,097 in 2021, from 1,573 in 2020. This reflects ongoing network reshaping and the retirement of some advisers due to significant industry reform.

Adviser network¹

	2021	2020	2019
No. of advice practices	433	595	954
No. of advisers	1,097	1,573	2,128
Advisers exiting the network	416	555	439
New advisers joining AMP network	61	127	96
New practices joining AMP network	-	9	8
FUM (\$m)/Adviser	69.0	56.2	52.3

¹ Represents total advisers in Australia licenced by AMP as part of the aligned advice network. It does not include self-licenced advisers under non-AMP licences.

Compliance with the Government's Higher Education Standards

(previously Financial Adviser Standards and Ethics Authority)

The Financial Adviser Standards and Ethics Authority (FASEA) was established in April 2017 to set the education, training and ethical standards for Australian licensed financial advisers. This body was disbanded on 1 January 2022 and their previous functions were transferred to Treasury and ASIC.

As of 1 January 2019, new entrants into the financial planning industry required an approved degree (or higher) and existing advisers are also required to upskill to meet the new higher education requirements. AMP is committed to supporting our advisers with clear pathways to achieve compliance.

As of 16 December 2021, 1,125 AMP advisers had sat and passed the Financial Adviser exam, representing 96% of our network. The remaining advisers are either eligible for the Better Advice Bill extension or are leaving the network. We have supported our network of advisers by offering access to assessed Continuing Professional Development (CPD) exam preparation modules, which align to the topics being assessed in the national exam. Additionally, AMP offered advisers optional one to one higher education coaching conversations and ran exam preparation webinars.

In 2021, AMP also included six Professional Planner ethics podcasts as part of our annual suite of CPD options. This content further assisted advisers in meeting their annual ethics CPD requirements.

PARTNERS AND SUPPLY CHAINS

Adviser professional standards

	2021	2020	2019
Advisers meeting FASEA exam requirements	96%	61%	22%
Advisers completing annual CPD requirements, including ethics training	99%	97% ¹	92%

¹ The 2020 completion rate reflects the deadline extension advisers received to 31 March 2021, in light of COVID-19.



AMP 2021 University Challenge

AMP University Challenge is a national financial planning competition for tertiary students that aims to identify promising new talent and promote high standards of education and professionalism among the next generation of advisers. More than 5,600 students from 30 universities across Australia have participated in the Challenge since it commenced in 2011, with many going on to join the financial advice profession.

The AMP University Challenge is integrated into the curriculum and assessment for students studying financial planning majors at Central Queensland University, Deakin University, Griffith University, TAFE NSW, University of Wollongong, Charles Sturt University and Western Sydney University.

In 2021, for the first time in the competition's 11-year history, there was a tie for first place in AMP's annual University Challenge. Jamie Lee Fraser from Griffith University has shared top honours with Molly McGinn and Aaron Mynard from Deakin University. Jamie, Molly and Aaron shared in the combined first and second place prize money of \$5,000.

Supply chain profile

In 2021, AMP spent approximately \$1.10 billion on external goods and services. About 30% of this spend is on IT infrastructure and services, 24% on professional services, which includes legal and consulting services, and 21% on investment and banking services. The remaining is a combination of human resources, property, travel, utilities and compliance-related spend.

As a predominantly services-based business, our spend is highly concentrated, with the top 116 suppliers representing approximately 80% of total spend.

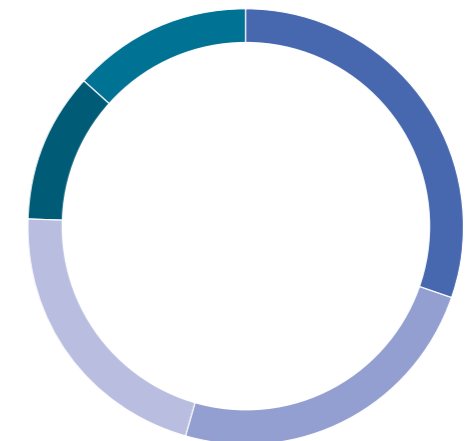
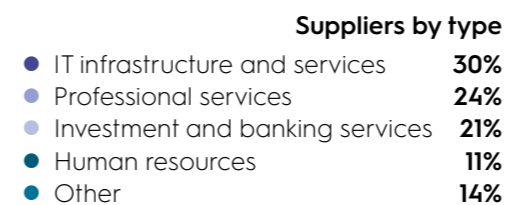
Through our aligned advice network, larger and network-wide outsourcing activities are managed

centrally, however individual practices are responsible for office-related procurement activities. Advisers who wish to engage offshore services are expected to submit evidence of due diligence to AMP.

AMP Capital's Real Estate business separately administers procurement and supply chain activities in its managed assets, including commercial, logistics and shopping centres. The managed and engineering services represent operating expenses of approximately \$97 million per year with over 700 suppliers based in Australia and New Zealand. About 36% and 12% are with cleaning and security services respectively, while the remaining spend is with a range of building services and related maintenance contractors. These suppliers are primarily Australian based.

SUPPLY CHAIN PROFILE 2021

\$1.10B
AMP total external payments¹



¹ Represents total external payments. Excludes corporate credit card, AMP Capital Real Estate fund activities and payments to customers.

Supply chain profile

	2021
AMP Capital Real Estate asset operations ¹	\$97m ²
Cleaning	36%
Security	12%
Other (including mechanical services, landscaping, lift maintenance)	52%

¹ Operational managed services, excluding capital and development works, statutory expenses, internal management and employment and related ad-hoc expenses.

PARTNERS AND SUPPLY CHAINS

Managing our supply chain

AMP is required by APRA to maintain a group-wide Outsourcing Policy, which is approved by the AMP Limited Board. This policy is designed to ensure that risks arising from all outsourcing arrangements are appropriately managed so that we meet our financial and service obligations to regulators, customers and other stakeholders. AMP also has a [Supplier Code of Practice](#) that outlines our expectations of suppliers and their employees or contractors to adhere to values that are consistent with AMP's own policies and standards.

In Australia, our group procurement team assesses AMP's major suppliers to manage service delivery and risks. The assessments include reviewing suppliers based on materiality, including commercial and regulatory impact. We apply appropriate governance over these arrangements to ensure we adequately manage service delivery and risks.

Within these governed relationships, we have various controls in place, such as contractual obligations, due diligence questionnaires and self-assessments, that consider risks and opportunities in our supply chain to ensure commitment to:

- 1 **Acting ethically and with integrity in our business relationships**
- 2 **Providing respectful and safe workplaces, free from discrimination**
- 3 **Observing International Labour Organisation principles and taking steps to address modern slavery in our supply chains**
- 4 **Maintaining privacy and information security**
- 5 **Considering and monitoring the environmental impact of goods and services used by AMP, where relevant**

AMP also has a range of procurement activity across AMP Capital Real Estate, International locations and subsidiaries with operations in New Zealand and India. For more information, please refer to AMP's [2021 Modern Slavery Statement](#).

Throughout 2021, we have continued to identify and address risks of modern slavery across our supplier management framework and other business activities. These are detailed in our [2021 Modern Slavery Statement](#).

AMP continued to manage the impacts of COVID-19, working closely with our partners and service providers to maintain critical services globally and to deliver for clients and members. This included ongoing support for remote working with offshore partners in India to ensure people's safety and maintain service levels.



Real assets – real estate

In 2021, AMP Capital Real Estate enhanced its engagement with suppliers on modern slavery risks. As of December 2021, 908 suppliers have been engaged via the Property Council of Australia's (PCA) Informed 365 Modern Slavery Risk Assessment Survey platform; with 335 completed surveys and 111 in progress.

Building on our 2020 progress, we developed a best-practice methodology to analyse the Informed 365 Modern Slavery Risk Assessment Survey results, including criteria to review suppliers' policy and process documents and undertake subsequent engagement with suppliers based on their inherent risk.

In 2021, an engagement strategy and implementation plan was piloted through 'deep dives' with three select suppliers. These suppliers were selected to cover a range of procurement pathways and risk profiles across our Real Estate development, operations and marketing activities.

Based on the outcomes of this pilot, we expect to formalise our approach in 2022. This is consistent with our continual improvement approach to managing modern slavery risks in our supply chain.



Human rights and Modern Slavery

In 2021, AMP published its first Modern Slavery statement under the Australian Modern Slavery Act, detailing the actions taken in 2020 to identify and address risks of modern slavery. As part of our ongoing commitment to respecting human rights, including Modern Slavery, we have continued to implement actions throughout 2021 which are detailed in our latest [2021 Modern Slavery Statement](#).

Building on the progress we have made on modern slavery and other human rights issues, such as Reconciliation, AMP has published its first [Human Rights Position Statement](#). This position outlines the relevant human rights issues to AMP Limited and the relevant policies and processes in place to address these risks.

Future outlook

As we look ahead, AMP will continue to:

- Support our advisers to meet their formal professional development requirements.
- Deliver on our contemporary service model to our aligned network, including new service proposition and fee model and release of institutional ownership from AMP Financial Planning to advisers Embed the principles of our Supplier Code of Practice into our supplier relationships and ongoing due diligence practices.
- Collaborate with industry to engage higher risk sectors and inform responses to complex issues such as human rights, modern slavery and information security.
- Monitor and manage modern slavery risks and progress the relevant activities outlined in our [Modern Slavery Statement](#).

COMMUNITIES AND ENVIRONMENT

Responsible investment

AMP is committed to responsible investment, taking a long-term view of how our investments will balance improved financial outcomes for our clients and members, and foster a sustainable and equitable future for everyone in our community. Environmental, Social and Governance (ESG) factors are important considerations in our investment decisions.

As trustee and investment manager for our clients and members' money and future wellbeing, our responsibility is to assess the economic, social and environmental risks and opportunities of each investment we make. We believe that taking a holistic approach to ESG issues, impacts and opportunities when investing leads to better results for all stakeholders.

AMP and our underlying investment managers consider a range of factors when investing on behalf of our clients and AMP superannuation members, including natural resource use, climate change, human rights, workplace health and safety, executive remuneration, board composition and diversity.

Through AMP Capital, we have a long history in responsible investment and gained insights that have shaped our broader investment management process and philosophy. AMP Capital launched our first responsible investment funds in 2001 and became one of the first signatories to the UN-backed Principles for Responsible Investment (PRI) in 2007. AMP Capital is also a member of the Responsible Investment Association of Australasia (RIAA) and the Tobacco Free Portfolios initiative.

ALIGNED SDGs



2021 at a glance

Our ongoing commitments to ESG and responsible investing have been reflected through:



AMP Capital's flagship GLOBAL LISTED REAL ESTATE STRATEGY attains certification RIAA

for its consideration of ESG as a central pillar in the first step of its investment process; making it one of the only listed real estate managers certified by RIAA



AMP CAPITAL REAL ESTATE PLATFORM

scoring an average

92%

in GRESB, a key ESG benchmark for real estate. This was an increase from our 2020 score, and with five funds receiving five Green Stars - the highest rating available



Launching an UPDATED RESPONSIBLE INVESTMENT AND ESG STATEMENT

as part of the transition of the multi-asset capability from AMP Capital to Australian Wealth Management



A/A+

PRI RATING

across AMP Capital asset classes in the most recent reporting period of 2020. Due to changes in the PRI methodology, ratings were not released at time of publication

MYNORTH LAUNCHING TWO ADDITIONAL RISK PROFILES

for the Sustainable Managed Portfolios, Moderately Conservative and Moderately Aggressive added to the existing Balanced Risk profile, to cater for a wider range of clients

Investment approaches

As a universal investor and large owner of companies and assets, on behalf of our clients and members, we have a stake in the effective operation and sustainability of the broader economy, the integrity and transparency of markets, and good governance and business conduct. We strive to embed ESG practices throughout our investments and risk management processes. Consideration of ESG factors and sustainable wealth creation are essential components of investing in our future.

Australian Wealth Management

In 2021, AMP developed a Responsible Investment and ESG statement and supporting framework, reflecting the largely outsourced investment model of the multi-asset business that has been developed to govern processes and decision making. To support its implementation, a new function reporting to the CIO was established and will assist in a range of ESG and responsible investment decisions, including:

- Managing our existing ethical principles screening and exclusion processes and controls.
- Continuing carbon footprint disclosures that were transitioned from AMP Capital in the new operating structure.
- Determining changes to the responsible investment approach in Australian Wealth Management where appropriate..

New Zealand Wealth Management

In 2021, we evolved our sustainable investment framework and philosophy focused on reducing the impacts of climate change through our core business, which delivered an initial reduction of ~60% in exposure to carbon emissions across our entire investment portfolio.

The new framework is expected to help our business produce returns in line with or better than the broader market index and result in a more sustainable impact for the world. This approach encompasses three key elements:

- Sustainable Investment Exclusions.
- Integration of Environmental, Social and Governance (ESG) considerations into our investment decisions.
- Stewardship through voting and engagement with companies.



RESPONSIBLE INVESTMENT

AMP Capital

AMP Capital's [ESG and Responsible Investment Philosophy](#) outlines our approach to considering material ESG factors across the assets managed by AMP Capital. Our team of specialists work in asset classes and across investment teams, providing research and advice that is integrated into our decision making and active ownership strategies. As Collimate Capital is separated from AMP Limited, the two businesses have established respective ESG capabilities.

ESG-themed investments ¹	Proportion of total AUM	
	2021	2020
AMP Capital	11.1%	9.6%
AMP Capital Private Markets (Infrastructure and Real Estate)	38.9%	32.8%

¹ Investments specifically related to environmental or social themes. This includes low carbon investments such as energy efficient buildings, clean power generation, social infrastructure and green bonds.

Investor collaborations

AMP and AMP Capital engages with other investors for industry responses to several ESG issues. As of 2021, AMP Capital is an active member or signatory of a number of initiatives, summarised in this table.

ESG	Climate	Gender	Governance	Human Rights
Principles for Responsible Investment (PRI)	Carbon Disclosure Project (CDP)	30% Club	International Corporate Governance Network (ICGN)	Cleaning Accountability Framework (CAF)
Responsible Investment Association of Australasia (RIAA)	Investor Group on Climate Change (IGCC)			
Global Real Estate Sustainability Benchmark (GRESB for real assets)	Climate Action 100+ (CA100+)			

Engagement model

As a global investor, AMP recognises our responsibility to engage with companies and assets where improvements in ESG performance may contribute to improved business and investment outcomes.

Given our diverse business and investment styles, AMP has varied approaches to engagement with companies and underlying managers. AMP Capital has internally managed funds, primarily through its Global Equities and Fixed Income (GEFI) business, where engagement activities are led by ESG and investment teams. In Australian Wealth Management, the majority of total AUM is ultimately externally managed by external fund managers. These external investment managers are responsible for engagement activities on behalf of AMP customers and members.

Following the sale of our GEFI business and integration of multi-asset investment capability to AWM, AMP expects to continue to use a combination of specialist investment managers operating under a separate investment mandate, or in pooled investments or unitised vehicles.

AMP Capital engagement – internally managed funds

AMP Capital's ESG and Investment Stewardship Team held direct interactions on behalf of clients of our internally managed funds with Boards and senior management of Australian companies. AMP Capital's investment teams recognise the importance of ESG issues to investors and investment decisions, regularly raising ESG-related matters with companies as part of broader discussions. For more information on how ESG perspectives have changed over time, read the AMP Capital ESG and investment stewardship reports. In 2021, the ESG team participated in 128 engagements with 95 individual Australian companies, including more than 50 direct meetings.

Key engagement topics raised in 2021 are outlined below. Some companies were engaged on specific issues in depth as part of an engagement process alongside other asset managers such as with Climate Action 100+.



Proxy voting

AMP Capital's approach has been to actively participate in voting on companies shareholder resolutions and participating in active and constructive engagement plays an important role in the long-term success of our investments. On behalf of our clients, AMP Capital has taken a proactive approach to assessing the resolutions in addition to guidance from proxy advisers. In 2021, this activity included communicating with 50 listed companies regarding our voting decisions.

Where AMP has appointed an external investment manager under a separate investment mandate, we require the manager to have their own proxy voting or corporate governance policy in place and authorise them to exercise voting rights attached to any securities forming part of the portfolio. In the process of voting, many external managers engage directly with companies on ESG or sustainability issues as part of their investment processes.

AMP monitors the voting and reserves its right to override the recommendations put forward by either proxy voting advisers and/or its investment managers. AMP also undertakes periodic reviews and has meetings with its external managers to understand their approach to ESG and sustainability issues.

In aggregate, external managers voted at 5,549 meetings comprising 56,971 resolutions across 58 countries in 2021. 80% of the time and participated in 671 shareholder resolutions. The details of our proxy voting activities, including our voting statistics, are available on the [AMP Capital website](#).

RESPONSIBLE INVESTMENT

Ethical framework

In exceptional circumstances, AMP Capital has sought to exclude companies, asset types or industry sectors from our investable universe on moral or ethical grounds.

In Australia, AMP has determined that manufacturers of cluster munitions, anti-personnel landmines, biological and chemical weapons (together 'controversial weapons') and tobacco do not meet the ethical principles. We avoid investment in companies considered to be materially involved in the manufacture, maintenance or delivery of controversial weapons and companies considered to be materially involved in the 'production and manufacture' and the 'distribution and sale' of tobacco and electronic cigarette (ENDS) products.

Where AMP has appointed an external fund manager under a separate investment mandate, we will require those investment managers to adopt these same divestment and exclusion strategies.

Where AMP does not have exclusive control of managed funds, for example where we invest in externally managed pooled vehicles without a separate investment mandate, we can not directly influence the external manager(s) to uphold our policy. We may continue to invest in such pooled funds, unit trusts or exchange traded funds and accept that the policies of that fund will apply.

In New Zealand, negative investment screens extend to other controversial activities that reflect stakeholder and legislative requirements in the country. These include investments in fossil fuels, palm oil, nuclear weapons, nuclear power, whale products and military and civilian firearms. More information on these screens is available on the [New Zealand Wealth Management website](#).

AMP Capital Real Estate

In 2021, we continued to progress on our [2030 Real Estate Sustainability Strategy](#), which aims to address key sustainability issues for the assets we manage on behalf of clients. These include climate change, waste, biodiversity, social impact, accessibility and supply chain impacts.

We are pleased to report progress on a number of objectives and targets in 2021, including:

- **GRESB results:** The average GRESB score in 2021 was 92%, an increase from 2020. Our client, UniSuper, was also recognised by GRESB as a Global and Regional Sector Leader for the Retail development benchmark, relating to new build activities.
- **Renewable Energy Power Purchase Agreement for UniSuper:** Following the successful procurement of renewable electricity for the Office strategy in 2020, a contract for all UniSuper East Coast assets was signed in June with a start date of 1 January 2022 to support its net zero ambition.
- **6-Star National Australian Built Environment Rating System (NABERS) ratings:** Four assets achieved or maintained the highest possible NABERS rating in 2021, earning a 6-star rating, which indicates a market leading performance.
- **Accessibility:** We are committed to creating inclusive places for the community and in 2021 opened adult changing facilities at Marrickville Metro's Smidmore Street and Karrinyup Shopping Centre, and are investigating Changing Place certification. We are also finalising a Guideline on Accessibility document to support retail centre staff and contractors in our approach.



INVESTING IN COMMUNITY INFRASTRUCTURE

In 2021, the community infrastructure capability acquired a 42% stake in Royal Adelaide Hospital – the largest single infrastructure project in South Australia and one of the most energy efficient and technologically advanced medical facilities in the world.

The landmark \$2.2 billion debt refinance of 100% of the project's debt involved a consortium of 18 banks and is the largest green loan for a PPP in Australia to date, the first to be issued with a social loan component in Australia and the largest combined green and social loan in the healthcare sector globally.

AMP Capital Infrastructure

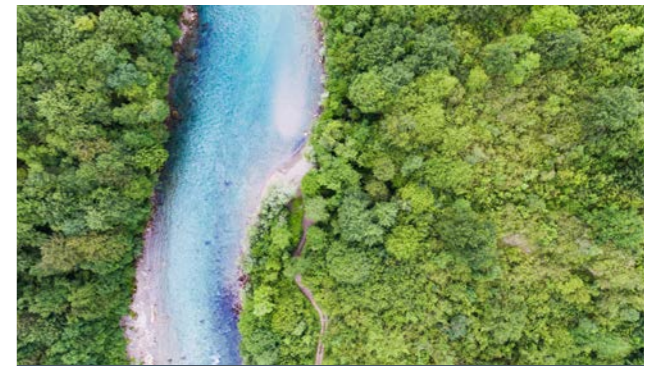
AMP Capital also manages funds which invest in community infrastructure assets across healthcare, education, justice, defence, community housing, transport, energy, water and recreational facilities. Our [Infrastructure ESG Policy Guidelines](#) details our approach to ESG in infrastructure and we continue to evolve our policy as ESG understanding and knowledge develops.

Three of our infrastructure funds and 22 assets participated in the GRESB Infrastructure Assessments in 2021. The average fund score was 84 out of a possible 100 points and an average asset score of 77 out of a possible 100 points. These results were above the global fund average score of 77 and the global asset average score of 72. Further, one fund and seven AMP Capital infrastructure assets were awarded 5-star GRESB ratings, recognised for their place in the top 20% of infrastructure participants.

We also maintained regular engagement with our investee companies on a range of topics, including GRESB assessments, modern slavery, people and culture and inclusion and diversity, and hosted several sessions throughout 2021 to encourage shared learning on complex ESG issues.

Responsible Investment options on platforms

AMP clients have access to a growing range of responsible investment options through our Wrap platforms via external fund managers. We are taking steps to ensure advisers are equipped with the information and tools necessary to support clients in identifying appropriate value-aligned investments to meet different risk and return appetites. Through our flagship platform, MyNorth, clients have access to over 40 responsible or sustainable investment options.



MYNORTH Sustainable Managed Portfolios

In June 2021, MyNorth launched two additional risk profiles for the Sustainable Managed Portfolios (Moderately Conservative and Moderately Aggressive) to cater for a wider range of clients.

This followed the launch of the Balanced portfolio in 2020, where the following principles are embedded into the portfolio design:

- 1 Transitioning to a low-carbon economy – a measured but meaningful approach to structural change.
- 2 Avoiding strategic investments in thermal coal, tobacco, gambling, pornography and controversial weapons – avoiding harm.
- 3 Encouraging sustainable social and environment outcomes for the community – driving positive change through capital.

Future outlook

AMP will continue to meet the increasing demand for responsible investment opportunities and management by:

- Improving measurement and reporting on the environmental and social impacts of our investments, through monitoring and review.
- Continuing to diversify and broaden the responsible and sustainable investment options available through our platforms and adviser channels.
- Increasing access to responsible investment focused information and learning opportunities for our aligned advice network.
- Managing our AMP KiwiSaver and investment product suite with a key focus on sustainable investing and addressing climate change.
- Discussing emerging responsible investment issues with the Youth Advisory Committee to understand the perspectives of young investors.

Climate change

Climate change is one of the most significant long-term global challenges to our environment, economies and societies. Global momentum around the issue accelerated in 2021 with the first release of the IPCC's Sixth Assessment Report and COP26 in Glasgow. These events mean there are heightened expectations on financial institutions to appropriately manage climate-related risks and opportunities and support global efforts on the transition to Net Zero emissions.

Climate change poses a range of physical, financial and legal risks to our business, the investments we manage on behalf of our customers, and the wider community.

AMP recognises that it must contribute to the global move to net zero by 2050. As a diversified financial services company, our ability to drive action to address climate change impacts differs across our business activities. AMP has identified five key areas of focus:

- 1 Investment opportunities:** Provide clients low carbon and green investment opportunities.
- 2 Manage and disclose risks:** Manage and appropriately disclose the physical and transition risks of climate change in our investments.
- 3 Engage and influence:** Leverage our influence as a global investor to engage with companies, assets and investor groups and advocate for an orderly transition.
- 4 Operations:** Reduce our own operational impacts as a business.
- 5 Clients and communities:** Offer support to clients and communities impacted by climate change.



2021 at a glance

AMP continued to drive action on climate change in 2021 by:



PUBLISHING OUR CLIMATE POSITION AND ACTION PLAN

outlining our commitment to managing our business and investments in alignment with

ACHIEVING NET ZERO EMISSIONS 2050

ALIGNED SDG



MAINTAINING A- LEADERSHIP RATING

on the annual Carbon Disclosure Project (CDP) benchmark, which is aligned to the TCFD framework



LEADING COMPANY ENGAGEMENTS WITH INVESTOR GROUPS

such as the

CLIMATE ACTION 100+

to drive successful climate-related outcomes



ACHIEVING CARBON NEUTRALITY ACROSS OUR GLOBAL OPERATIONS

for our

9TH YEAR

and a 22% reduction on scope 1 and 2 emissions from 2020

Environmental and climate-related governance

Overall responsibility for AMP's climate change related strategies sits with the CEO of AMP, who reports to the AMP Limited Board. The board oversees climate-related risks and opportunities of the group and is updated annually.

AMP's Trustee and Responsible Entity boards also oversee climate-related risks and opportunities for the funds for which they are responsible. These are outlined in the [Sustainability governance section](#) of this report.

In addition, AMP has management committees which address climate-related issues, including:

- **The Group Risk and Compliance Committee (GRCC)**, which guides the implementation of the risk management framework and manages non-financial risks facing AMP, including climate-related risks.
- **The Environment and Climate Change Working Group (CCWG)**, which meets regularly throughout the year to collaborate and drive climate-related initiatives and compliance activities across AMP. It consists of members from each business division and asset class and reports to the GRCC.
- **The AMP Capital Investment Committee** has oversight accountabilities for investment risks on behalf of AMP Capital clients, including risks and opportunities associated with climate change. The Investment Committee includes leaders of each asset class (public markets, infrastructure and real estate). Responsibility for climate-related risks on specific investments rests with individual investment teams, asset and portfolio managers.

In 2021, as part of the proposed demerger of Collimate Capital, the multi-asset investment capability has transferred to Australian Wealth Management and a new Investment Committee was established to oversee investment-related risks for Australian Superannuation and Platform investments.

Strategy and risk management

In the context of the Taskforce on Climate-Related Financial Disclosures (TCFD), AMP is an asset owner, asset manager and bank lender to our clients. The greenhouse gas (GHG) emissions associated with our own operations are relatively small. AMP Bank provides transactional banking services, residential mortgages and some adviser practice financing. It is not directly exposed to potentially high-risk industries such as energy generation, mining or agriculture as it does not provide business financing.

While we still manage the climate change risks in these activities, climate change is most likely to materially impact our investment management activities. Through the investments we offer in Australian Wealth Management and New Zealand (as an asset owner) and AMP Capital (as an asset manager), we are taking steps to give clients choice and manage risk.

To date, our investment management activities have been managed primarily through AMP Capital's ESG frameworks, as AMP Capital has been the appointed asset manager for the majority of the group's assets under management. In 2021, AMP announced that the direct Global Equities and Fixed Interest businesses would be sold, the intention to demerge Collimate Capital during 2022 and that the multi-asset investment capability would be transferred to the Australian Wealth Management business. As a result, a new Responsible Investment and ESG statement and supporting framework, reflecting the largely outsourced investment model of the multi-asset business has been developed to govern processes and decision making.

AMP also offers investments managed by external managers and governed by Responsible Entities outside the AMP Group, on our investment platforms, such as North.

Providing clients low-carbon and green investment opportunities

AMP offers clients specific investment options through superannuation and personal investment services that adhere to strict ESG requirements and governance.

Financial advisers are equipped to help clients understand where money is invested and how to access responsible investment options aligned to their goals and values. We are increasing the resources available to advisers to support clients in these decisions.

AMP offers investment options through AMP Capital, the retained multi-asset investment capability and on Platforms which exclude some emissions intensive industries and/or favour better performing ESG companies and assets. They include investments in clean energy technologies, sustainable enterprises and direct investment in energy efficient buildings. This also provides clients the opportunity to reduce exposure to climate-related risks as part of their superannuation or investments when compared to more conventional funds.

CLIMATE CHANGE

AMP Capital Infrastructure

AMP Capital is pursuing climate-positive investments internationally for clients where regulatory and other incentives are providing new opportunities consistent with our client's investment objectives. To date, several infrastructure transactions have been completed in clean energy and transport sectors, including direct investments in wind, hydro and offshore transmission assets.

AMP Capital Real Estate

AMP Capital has committed all its managed Real Estate funds to be zero net carbon by 2030 for scope 1 and 2 emissions (which includes natural gas, diesel and electricity consumption) and for buildings to run on 100% renewable electricity.

Climate change considerations have been integrated into asset due diligence processes, including climate risk, energy efficiency, operating costs and suitability for solar energy. The carbon footprints of our real estate funds are measured and benchmarked as part of annual GRESB assessments and regulatory disclosure through the National Greenhouse and Energy Reporting Act (NGER).



Humanising Energy

In October 2021, AMP Capital's infrastructure investee company Evergen was featured in a new online series of films produced by the World Energy Council in partnership with BBC StoryWorks. The series, titled 'Humanising Energy', focused on showcasing global energy start-ups which are driving energy transformation at a grassroots level.

Evergen are determined to make a coal fired power station redundant in each of 10 countries by powering the transition to a resilient, renewable, decentralised energy system of the future. This will be achieved by optimising and orchestrating large fleets of batteries in industrial, commercial and residential sites.

Using this technology, Evergen will provide the energy management platform for the net-zero energy emission homes pilot at Carseldine Village, north of Brisbane. This project will establish a 100% solar and battery neighbourhood consisting of 194 sustainable homes. Evergen was also recognised as a finalist in the 2021 Start Up Energy Transition Awards organised by the German Energy Agency and the World Energy Council.

Managed Real Estate portfolios¹

	2021	2020	2019	2018
Scope 1 emissions (tCO ₂ -e)	7,180	6,783	6,748	8,117
Scope 2 emissions (tCO ₂ -e)	66,707	78,683	93,094	102,491
Total scope 1 and 2 emissions (tCO ₂ -e)	73,887	85,466	99,842	110,608

¹ Managed Real Estate portfolios include commercial office and shopping centre assets managed by AMP Capital Real Estate. Footprint metrics are NGER reported emissions in Australia for year ending 30 June 2021.

Managing and disclosing climate-related risks

Transition risks

In AMP Capital, we have previously undertaken preliminary scenario analyses on our managed equity portfolios using a projected carbon price. Carbon pricing mechanisms currently operate in several countries globally to incentivise emissions reductions and can be applied to equity and fixed interest portfolios. Different carbon prices have been used to assess potential impacts, including \$25/tonne CO₂-e, \$50/tonne CO₂-e and \$100/tonne CO₂-e. Preliminary assessments have also been undertaken of value at risk from a gradual phasing out of fossil fuels for major equity benchmarks. Further information is available on the AMP Capital website.

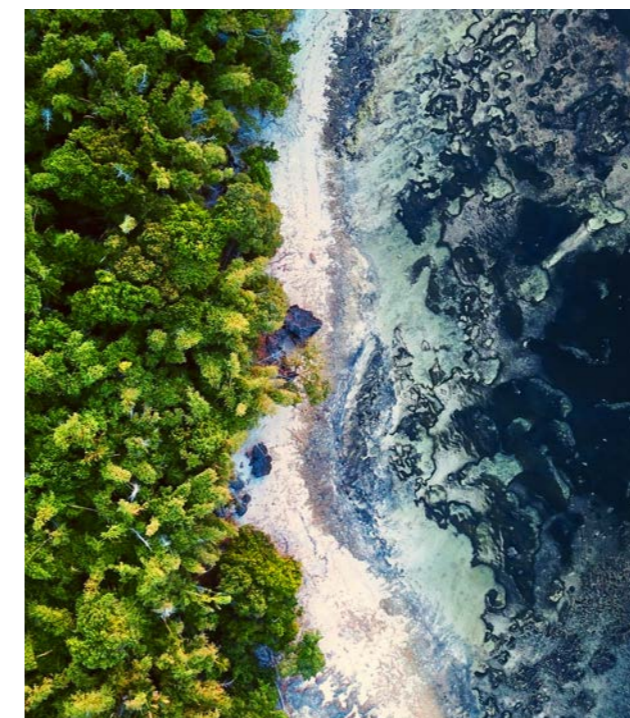
In New Zealand, the business delivered an initial reduction of approximately 60% in exposure to carbon emissions across its entire investment portfolio and is finalising its framework to implement its Carbon Net Zero commitment as an investment manager.

Physical risks

AMP Capital has taken steps to understand the risks that a changing climate poses to our real estate assets, quantify those risks, and mitigate them where possible.

Previously, we conducted work on scenario analysis, which included considering the Intergovernmental Panel on Climate Change (IPCC) Representative Concentration Pathways (RCPs), the anticipated change in acute and chronic climate parameters, and asset level climate change risk assessments. In 2021, AMP Capital Real Estate built on this work, setting out a plan to review the current processes for determining asset resilience, and develop a framework to quantify the physical risk and cost implications using the climate value at risk (CVaR) methodology. We have started with two pilot sites, including 33 Alfred Street – AMP's Circular Quay headquarters.

AMP Bank monitors and assesses bushfire risks of mortgage assets in the portfolio to understand proximity of possible bushfires to buildings and support communication with customers who might be affected. AMP Bank engages with industry working groups to enhance approaches to identify and manage physical risks to the portfolio and expects to expand these capabilities in 2022.



AMP Capital Carbon footprint of managed equity and fixed income funds

Understanding the carbon footprint of a company is an essential first step in assessing the investment risks that can arise from climate change. We have been assessing the climate risks of our investments for over a decade and in 2016 created a methodology for calculating the greenhouse gas exposure of our equity investments. This was then expanded to include fixed income.

In 2021, AMP Capital continued to publish its latest carbon footprints of all managed equity and fixed income funds relative to their benchmarks to enhance our clients' understanding of climate-related investment risks.



CLIMATE CHANGE

AMP Capital co-leads engagement with BHP through Climate Action 100+

AMP Capital has co-lead on CA100+'s BHP engagement, which is an investor-led initiative formed to ensure the world's largest corporate emitters of greenhouse gases take the necessary action on climate change. AMP Capital has seen significant progress and received positive feedback on the constructive nature of our engagement. The engagement activities of CA100+ have led to key outcomes, including:

- BHP being recognised as one of the strongest performing companies in the [net-zero benchmark](#) for 2021. The result highlights the actions taken from engagements including pursuing emissions reduction targets, capital expenditure alignment, use of carbon offsets and political engagement through industry associations. There is more work to do, and CA100+ participants will continue

to engage with BHP on climate-related issues, particularly on managing Scope 3 emissions.

- BHP was one of the first Australian companies to give their shareholders a 'Say on Climate'. After BHP released their 'Climate Transition Action Plan 2021', CA100+ encouraged BHP to put the plan to shareholders for approval at the 2021 AGM. The resolution was supported by around 85% of shareholders at BHP's Australian AGM and 83% at the London AGM

In addition, BHP recommended shareholders vote in support of the shareholder-proposed resolution on climate-related lobbying, a move which resulted in nearly 99% of shareholders supporting the request for BHP to strengthen their review of industry associations to ensure alignment with the Paris Agreement.

Engagement and proxy voting

Through AMP Capital, we also directly engage with investment managers, assets, companies and policymakers on climate change and through a range of investor collaborations and initiatives. This includes as co-founder of the [Investor Group on Climate Change \(IGCC\)](#), being an early investor signatory to the CDP, and through actively participating in the global [Climate Action 100+](#) investor engagement initiative. More details on AMP Capital's engagement activities are available on the [AMP Capital website](#).

Managing our own operations

AMP has been carbon neutral since 2013 across our global office operations, offsetting emissions arising from office buildings and scope 3 emissions from business activities, including air travel.

In 2021, AMP maintained its carbon neutral position and continued to reduce emissions in line with the scope 1 and 2 reduction target of 42% by 2030 from our 2019 base year, which includes 100% renewable electricity. This target has been developed with reference to Science Based Target Initiative (SBTi) methodology.

In 2021, AMP saw a 36% reduction in operational scope 1 and 2 emissions (mainly office electricity usage) from our 2019 base year. The reductions were mainly driven by reduced occupancy and office utilisation globally from COVID-19 restrictions, in addition to our efforts to consolidate our office portfolio typically in more efficient office buildings.

Carbon footprint¹

	2021	2020	2019 (base year)
Scope 1 + 2 emissions (tCO ₂ e)	4,988	6,401	7,760
Scope 3 emissions (tCO ₂ -e) ²	9,728	9,034	14,227
Gross scope 1 + 2 + 3 emissions (tCO ₂ e)	14,716	15,435	21,987

¹ Reported in line with AMP's Greenhouse Gas reporting criteria. AMP Wealth Management New Zealand seeks local carbon neutral certification through the Toitu Envirocare program. More information on emissions can be found in the [performance data summary](#).

² In 2021, AMP expanded its scope 3 inventory to include estimated emissions arising from its purchased goods and services.

Carbon offsets

AMP offsets its residual emissions with high quality Australian and international carbon offsets, supporting projects where we have operations and partnerships globally. In 2021, for AMP to achieve carbon neutrality across our global operations, we retired Australian Carbon Credit Units and Verified Carbon Standard offsets from the following projects:

- Paroo River North Environmental Project: Regenerates 38,000 hectares of native Australian forest and aims to generate positive benefits for local indigenous communities.
- Hebei Haixing 49.5 MW Wind Farm: Generates renewable electricity using wind power resources and sells the generated output to the Hebei Southern Power Grid in China.
- Ghani Solar Renewable Power Project: The project activity involves installation of a 500 MW solar power project in India.
- Capacity Upgrade of Gunung Salak Geothermal Power plant: The additional installed capacity of 15 MW in Indonesia generates and supplies renewable energy.

AMP Wealth Management New Zealand offset carbon emissions through the support of New Zealand based projects, including the restoration of native forests at Puhī Peaks Station in Wellington and Wanganui.

AMP Capital also achieved zero net carbon for scope 1 and scope 2 emissions for the Australian Wholesale Office Fund (AWOF) assets managed by AMP Capital. This was achieved through a combination of renewable electricity purchases and purchasing carbon offsets. The offsets purchased for the fund are from the Longdowns project, which is re-establishing native forest in the North-West region of New South Wales.

Nature and biodiversity

An emerging issue that gained focus in 2021 was nature and biodiversity risks as the industry prepares for the launch of new guidance from the [Task Force on Nature-related Financial Disclosures \(TNFD\)](#) and updates to GRI's Biodiversity reporting standards. AMP recognises the growing importance of nature and biodiversity-related information in assessing the environmental impacts of our business and will review our disclosures and reporting processes as new guidance on this topic emerges. We raised the issue of biodiversity and nature-related risks with our [Youth Advisory Committee](#) in 2021 to hear perspectives from a young demographic. Their insights included the importance of education and awareness on the issue and its relationship with climate change. We continue to consider the insights and recommendations from the committee and identify ways AMP can reduce our own impact in this space.



Future outlook

AMP continues to build on its progress in measuring, managing and addressing climate change, through:

- Providing access to low-carbon investment opportunities for clients.
- Managing and enhancing the disclosure of physical and transition risks in our investments.
- Leveraging our influence as a global investor to engage with companies, assets and investor groups and advocate for an orderly transition.
- Reduce our scope 1 and 2 emissions (mainly electricity usage in our office buildings) by 42% by 2030 and be powered by 100% renewable electricity.
- Remain carbon neutral in our operations and select material scope 3 emissions from our supply chain (such as travel and purchased emissions).
- Consider emerging risks associated with climate change such as biodiversity and nature-related risks.

Community investment

AMP has a strong tradition of community investment and for the past 30 years this support has been delivered by the AMP Foundation – one of Australia’s largest corporate foundations.

Since it was founded in 1992, the AMP Foundation has invested more than \$108 million into the community by providing grants to non-profits that include start-up funding and growth capital, as well as funding for capacity building and operational activity. It has also been an early adopter of impact investing and has committed 10% of its corpus to impact investment vehicles that bring about social and environmental change.


The AMP Foundation supports non-profits that help disadvantaged Australians build financial security. It also helps AMP employees and AMP aligned advisers give back to the community through a structured program that includes pro bono work, skilled volunteering, mentoring and fundraising.

AMP Capital also invests in the communities in which its managed office and shopping centre assets are located. These activities are aimed at engaging local communities providing fundraising, volunteering and in-kind support.



2021 at a glance

In 2021, the AMP Foundation, alongside other areas of the business, made significant contribution to the communities in which we operate, taking a range of actions, including:

 <p>FUNDING THREE NEW PARTNERSHIPS WITH NON-PROFITS</p> <p>that support financial counselling and financial capability programs and services across Australia in line with the Foundation's strategic focus on financial wellbeing</p>	 <p>DONATING \$1 MILLION IN GRANTS</p> <p>through the AMP Tomorrow Fund to help 27 Australians working in diverse fields – including medical research, social enterprise, education and disability support – to find new solutions to community issues</p>	 <p>COORDINATING SEPTEMBER FUNDRAISING</p> <p>with 377 employees raising \$125,752 to support the Cerebral Palsy Alliance who recognised AMP as one of the top 25 organisations for our contribution in 2021</p>	 <p>DONATING MORE THAN \$180,000</p> <p>to communities through in-kind support, donations and fundraising in which AMP Capital assets operate</p>	 <p>AMP WEALTH MANAGEMENT NEW ZEALAND CONTRIBUTING NZ\$86,000 TO KEY CHARITY PARTNERS</p> <p>including Voices of Hope, The RSA's New Zealand Remembrance Army and Living Wage Aotearoa, which the business supports as a founding member on its Principal Partners Council</p>
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ALIGNED SDGs



Community partners

In 2021, the AMP Foundation began working with three new financial wellbeing partners – Tender Funerals Australia, Wesley Mission, and Variety Queensland. It also continued working with long-term partners Cancer Council NSW and Good Shepherd.

Tender Funerals: Paying for a funeral is one of the financial pressure points for low-income families – it can put them into substantial debt for many years. To help solve this issue, Tender Funerals provides customised, low-cost funerals and since its inception has saved low-income families who have accessed its services more than \$6 million in direct costs.

It is working to replicate its model in six locations around Australia, including Far North Queensland, Perth, Tasmania, Western Sydney, Canberra and the Mid North Coast.

Wesley Mission: The need for financial counselling services outweighs the number of financial counsellors available to provide it. That's why Wesley Mission has piloted a program to grow the number of financial counsellors

in Australia. With the AMP Foundation's support, a customised one-year program provides support for people to study and receive placement support.

Variety Queensland: Having a child who is ill or has a disability brings unique challenges and financial pressures to families. Variety is piloting a program to support these families through the provision of targeted financial counselling support.

Cancer Council: Throughout 2021, AMP-aligned financial advisers provided free financial advice to people affected by cancer through the AMP Foundation funded Cancer Council Pro Bono Program.

Good Shepherd: Our partnership with financial inclusion specialist Good Shepherd provided AMP customers in financial hardship with support services, including financial counselling, help with domestic violence, mental health, gambling addiction and housing support.

Community investment

	2021	2020
AMP Foundation direct giving	\$3,234,949	\$4,651,558
Other AMP direct giving	\$16,638	\$244,338
Number of financial advice cases delivered via Cancer Council Pro Bono Program ¹	295	334
Cancer Council Pro Bono Program service value ¹	\$295,000	\$334,000

¹ Based on \$1,000 per pro bono case for AMP-aligned advisers. 2020 figures have been restated using a consistent methodology to allow year-on-year comparison.



Impact investing to increase Specialist Disability Accommodation

The AMP Foundation has committed to invest up to 10% of its corpus in impact investment initiatives which have the potential to make a purposeful and measurable social or environmental impact and deliver financial returns.

One of the Foundation's impact investments is in the Australian Unity Specialist Disability Accommodation Fund. Specialist Disability Accommodation (SDA) is housing designed or modified to suit the needs of people with extreme functional impairment or very high support needs. With demand vastly outweighing supply, as many as 33,200 places will be required in the coming years.

This unlisted fund is investing in residential property across Australia, modified for people with disabilities, to expand the supply of Specialist Disability Accommodation in Australia. It is partnering with specialist consultants and organisations to source, design, fit-out and tenant the properties, and ensure high-quality tenant care.

The Fund's target is to build 192 specialist disability accommodation properties across Australia, ensuring people with complex needs live in suitable and appropriate accommodation, and lead lives with independence and dignity.

COMMUNITY INVESTMENT

AMP's Tomorrow Fund

AMP's Tomorrow Fund is a unique program providing \$1 million in grants to individuals whose ideas and initiatives are benefiting Australia. Each year, AMP's Tomorrow Fund awards grants of up to A\$100,000 for a wide range of activities, including training, travel costs, living expenses, research or small business costs. So far, 334 grants have been awarded.

In 2021, the program awarded grants to 27 Australians who have made meaningful contributions towards addressing some of the country's most significant community issues. These include addressing financial abuse, engaging disaffected young people through training programs, reviving an Aboriginal language, addressing prisoner recidivism, treating lead exposure in soil, encouraging more bone marrow donations, improving the way glaucoma is diagnosed and providing local food security and employment in rural areas.



Rebecca Glenn

Rebecca founded the Centre for Women's Economic Safety (CWES) to raise awareness of economic abuse while advocating for structural

and systems change. She has big plans for the charity, aiming to develop more self-help tools for women in need, offering Mobile Money Clinics to provide more safe spaces for money discussions, promoting Economic Abuse Awareness Day and expanding training in economic abuse. This grant will help Rebecca to create this change.



Rhiannon Mitchell

Rhiannon is studying at the National Marine Science Centre on Gumbaynggirr Country (Coffs Harbour) and is encouraging other young Indigenous women to care for themselves and the environment through Saltwater Sistas. This business with purpose offers workshops on culture and marine ecology, while also providing ocean-based activities such as snorkelling and beach clean-ups, and opportunities to learn from Elders and other mentors. This grant will help Rhiannon to grow the business and connect more young women to country and community.



David Graham

In 2019, 'Farmer Dave' co-founded RuffTrack. It provides at-risk young people in the Hawkesbury Region with the safety, skills and support to change their behaviours and reconnect with country and their community. Over 10 weeks, each RuffTrack participant works with a dog to learn how to build positive relationships, communicate and undertake farm work. The young people also use their new-found trade skills and confidence to support the local community. This grant will enable RuffTrack to buy equipment to help young people to learn, grow and give back.

Employee contributions

Our employees continued helping the community by engaging in volunteering, mentoring and fundraising. In 2021, AMP employees contributed 13,496 hours to support our community through the following programs:

Fundraising and payroll giving: With the AMP Foundation's dollar-matching support, AMP employees raised \$1,050,774. Our largest fundraising event was The Funding Network, which raised close to \$300,000 for three AMP Tomorrow Fund charities.

Mentoring and skilled volunteering: Our people shared their knowledge through mentoring and skilled volunteering supporting AMP Tomorrow Fund grant recipients, as well as supporting marginalised women running micro businesses through the Global Sisters program.

Through Ardoch's Numeracy Buddies program, employees mentored disadvantaged primary school students to increase their numeracy skills.

Volunteering: While face-to-face volunteering was restricted again in 2021, AMP's people supported various charities, including Good360 to pack essential COVID-19 care bags and Our Big Kitchen to prepare meals.

Unsung Heroes: The AMP Foundation supports the community contributions of AMP employees who serve on a non-profit board or who volunteer more than 80 hours of their own time by making a donation to that charity. In 2021, 31 employees were recognised as Unsung Heroes for their volunteer work.

Employee community contribution

	2021	2020
Employee giving and fundraising	\$1,050,774	\$1,359,688
Employee volunteering contribution value	\$827,611	\$1,180,896

AMP Capital asset community initiatives

AMP Capital shopping centres in Australia and New Zealand coordinated activities for charities active in the local communities – providing fundraising, volunteering and in-kind support. In 2021, more than \$180,000 was donated through initiatives such as the sponsorship of Surf Life Saving Queensland, distributing gift cards and Christmas hampers for community members in need and providing space for local fundraising efforts, including the Red Shield Appeal and Red Cross.

AMP New Zealand Wealth Management

In 2021, AMP's New Zealand Wealth Management (NZWM) team contributed NZ\$86,000 to key charity partners, including Voices of Hope, the RSA's New Zealand Remembrance Army and Living Wage Aotearoa.



AMP Capital assets repurposed for community services during COVID-19

AMP Capital's portfolio of schools in Queensland, New South Wales, Victoria and South Australia remained open throughout 2021 to support essential services personnel who were required to work through the pandemic. They also remained open to allow vulnerable students the ability to go to school, to provide a safe and conducive learning environment for those who were unable to learn effectively at home. The movement of furnishings, equipment and air filtration systems was paramount to ensuring that administration and teaching spaces remained a safe environment for students and staff.

Future outlook

In 2022, we will:

- Continue to support our community partners who are helping disadvantaged people improve their financial wellbeing.
- Offer \$1 million in grants to individuals through the AMP Tomorrow Fund.
- Align opportunities for our employees and advisers to donate their time, skills and resources to support the community with a focus on financial wellbeing.
- Commemorate AMP Foundation's 30th anniversary.

Independent Limited Assurance Statement

to the Management and Directors of AMP Limited



Building a better working world

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Our Conclusion

Based on our limited assurance procedures, hereafter referred to as a 'review', undertaken in accordance with Australian Auditing Standards, nothing came to our attention that caused us to believe that:

- AMP's 2021 Sustainability Report ('the Report') does not meet the requirements of the Global Reporting Initiative (GRI) Standards' Reporting Principles.
- The quantitative metrics detailed below in Table 1 and the related qualitative sustainability performance disclosures in the Report are not prepared and presented fairly in accordance with the noted Criteria, as defined below.

What our review covered

Ernst & Young ('EY') was engaged by AMP Limited ('AMP') to carry out a review over a selection of qualitative disclosures and quantitative metrics contained in AMP's 2021 Sustainability Report for the year ended 31 December 2021. We have also reviewed whether anything caused us to believe that the Report as a whole does not meet the requirements of the Global Reporting Initiative (GRI) Standards' Reporting Principles.

Subject Matter

Specifically, the Subject Matter for the review included:

- AMP's 2021 Sustainability Report as it relates to the GRI Standards Reporting Principles.
- A selection of quantitative metrics, as outlined in Table 1 below, chosen based on the outcomes of AMP's self-assessment process (see page 18 of the Report for the self-assessment process), including AMP's carbon neutrality status.
- A selection of qualitative sustainability performance disclosures relating to the quantitative metrics, outlined in Table 1.

Table 1: Sustainability performance metrics

Performance Data	
Climate Change	
1.	Scope 1 greenhouse gas ('GHG') emissions of 146 tonnes of carbon dioxide equivalent (tCO ₂ -e);
2.	Scope 2 GHG emissions of 4,842 tCO ₂ -e;
3.	Scope 3 GHG emissions, as articulated in AMP's self-declared criteria, of 9,728 tCO ₂ -e;
4.	AMP's carbon neutrality statement, including the retirement of eligible carbon abatement certificates, for AMP's operations.

Performance Data

Human Capital Management

- AMP employee engagement index of 71
- Male employee turnover of 25.4%
- Female employee turnover of 22.5%
- Female % on the Board of 50%
- Female % of Senior Executives at 39%
- Female % as Head Of at 36%
- Female % in Middle Management of 43%
- Female % in General Workforce of 50%

Digital Disruption and Security

- Number of data breaches of 5

Customer Experience

- Client Net Promoter Score of +27
- Number of complaints received: 12,501

Ethical Conduct and Governance

- Employees completing mandatory training, including Code of Conduct of 99%
- Advisers completing mandatory ethics training of 99%

The Subject Matter did not include:

Data sets, statements, information, systems or approaches other than the sustainability performance disclosures articulated in our Subject Matter and specified in Table 1 above; and neither Management's forward-looking statements nor any comparisons made against historical data. Our Subject Matter does not include sustainability disclosures relating to AMP's funds, or for activities outside of AMP's self-declared reporting boundaries, as specified in the Criteria below.

Criteria applied by AMP

In preparing the Subject Matter, Management determined the reporting criteria as set out in:

- AMP's self-declared criteria as set out in its 'Greenhouse Gas Reporting Criteria' and 'Sustainability Report Process' documents, inclusive of the reporting boundaries for operational impact emissions, environmental metrics, and sustainability disclosures
- Criteria as established under the *Climate Active Carbon Neutral Standard for Organisations* (2019) for calculating and offsetting carbon emissions relating to AMP's carbon neutrality status
- National Greenhouse and Energy Reporting Act 2007* for scope 1 and 2 GHG data

- The *Global Reporting Initiative (GRI) Standards'* (2021) reporting principles, being Accuracy, Balance, Clarity, Comparability, Completeness, Sustainability Context, Timeliness, Verifiability.
- The Sustainability Accounting Standards Board (SASB) 'Asset Management and Custody Activities' Standard (Version 2021-12)

Key responsibilities

EY'S RESPONSIBILITY AND INDEPENDENCE

Our responsibility is to express a conclusion on the sustainability performance disclosures, based on our review. We are also responsible for maintaining our independence and confirm that we have met the requirements of the *APES 110 Code of Ethics for Professional Accountants*, and that we have the required competencies and experience to conduct this assurance engagement.

AMP'S RESPONSIBILITY

AMP's management is responsible for selecting the Criteria, and for preparing and fairly presenting the Subject Matter in accordance with that Criteria and is also responsible for the selection methods used in the Criteria. Further, AMP's management is responsible for establishing and maintaining internal controls relevant to the preparation and presentation of the Subject Matter that is free from material misstatement, whether due to fraud or error; selecting and applying appropriate criteria; maintaining adequate records and making estimates that are reasonable in the circumstances.

Our approach to conducting the review

We conducted this review in accordance with the Australian Auditing and Assurance Standards Board's *Australian Standard on Assurance Engagements Other Than Audits or Reviews of Historical Financial Information* ('ASAE 3000'), and Assurance Engagements on Greenhouse Gas Statements ('ASAE 3410'), as well as the terms of reference for this engagement as agreed with AMP.

Summary of review procedures performed

A review consists of making enquiries, primarily of persons responsible for preparing the sustainability metrics and associated disclosures and applying analytical and other review procedures.

Our procedures included:

- Gaining an understanding of the basis for calculating, measuring, and reporting select sustainability disclosures during the reporting period
- Conducting interviews with key personnel at AMP to understand the process for collating evidence, considering AMP's self-declared criteria
- Determining whether material topics and performance issues relevant to the Subject Matter had been adequately disclosed
- Undertaking analytical review procedures to support the reasonableness of the Subject Matter
- Checking that calculation criteria had been applied in accordance with the methodologies outlined in AMP's self-declared criteria
- Checking emissions factors to consider their consistency with the reporting criteria
- Testing, on a sample basis, underlying source information to consider the completeness and accuracy of the matter being assured
- Confirming that an adequate number of eligible carbon abatement certificates had been purchased and retired to meet the carbon neutrality status

- Reviewing the presentation of the Subject Matter in AMP's 2021 Sustainability Report
- Reviewing the presentation of claims, case studies, and data against the relevant GRI Standards Reporting Principles contained in the Criteria
- Determining whether material topics and performance issues identified during our procedures had been adequately disclosed in the Report.

We believe that the evidence obtained is sufficient and appropriate to provide a basis for our limited assurance conclusions.

Limited Assurance

Procedures performed in a limited assurance engagement vary in nature and timing, and are less in extent, than for a reasonable assurance engagement. Consequently, the level of assurance obtained in a limited assurance engagement is substantially lower than the assurance that would have been obtained had a reasonable assurance engagement been performed.

While we considered the effectiveness of management's internal controls when determining the nature and extent of our procedures, our assurance engagement was not designed to provide assurance on internal controls. Further, our procedures did not include testing controls or performing procedures relating to checking the aggregation or calculation of data within IT systems.

Use of our Assurance Statement

We disclaim any assumption of responsibility for any reliance on this assurance report to any persons other than management and the Directors of AMP, or for any purpose other than that for which it was prepared.

Our review included web-based information that was available via web links as of the date of this statement. We provide no assurance over changes to the content of this web-based information after the date of this assurance statement.

Ernst & Young


Mathew Nelson
Partner

Melbourne, Australia
3 March 2022





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AMP Limited ABN 49 079 354 519
Unless otherwise specified, all amounts
are in Australian dollars.