

Responsible Marketing & Communications Policy

As the UK's largest long-term savings and retirement business, we take our responsibility for the way in which we market and communicate our brands, products and services seriously. Through our family of brands, we aim to offer products and services that meet the needs of our consumer audiences including long term savers, prospects and customers and deliver good customer outcomes. We also aim to meet the needs of our specialist audiences including policymakers, investors, financial intermediaries and future talent. For all of our audiences, we aim to address material social and environmental issues throughout our marketing and communications.

A big part of how we offer our brands, products and services responsibly is how we talk about them. We're committed to helping our customers and long term savers to understand their finances and make informed decisions by giving:

- the correct information;
- at the correct time;
- and in the correct way.

We are committed to operating as an inclusive and accessible company. We recognise that we have a diverse customer base and will aim to create products that meet our customers' financial objectives, now and later in life. We want all the ways we communicate to be easily accessible and understood. This policy sets out how we are making sure this happens through responsible marketing, communications and engagement with our audiences.

OUR COMMITMENTS.

We are committed to...	
1.	Making sure all of our marketing and product information is thorough, accurate, clear and balanced, easily understood and not misleading.
2.	Being transparent regarding product and services risks.
3.	Making sure that we are accessible and inclusive with the information we share and the products and services we sell, including, refraining from using small print.
4.	Adhering to regulation and going above and beyond where we can.

WHO DOES THIS POLICY APPLY TO?

This policy applies to our brands, and actively marketed and communicated products and services across the Group.

WHAT IS RESPONSIBLE MARKETING AND COMMUNICATIONS?

We are committed to making sure all of our marketing and product information is thorough, accurate, clear and balanced. We want everything to be easy to understand and not misleading.

When communicating with our audiences, we ensure that there are measures and guidance in place to support them through any complex and complicated wording. We design our communications to be clear, concise and easily understandable. We avoid using technical jargon or complex language which could confuse or mislead where possible. Our aim is to provide information in a manner which enables our consumer audiences to make informed decisions about our products and services. We're currently exploring opportunities to reach offline customers, to let them know about the digital support we offer. As well as providing support for those that are online to improve their digital skills, we've created digital skills hubs for our customers and their loved ones to access and learn online in their own time and at their own pace.

We are committed to being transparent about product and services risks

Our product lifecycle sets expectations of activities required to support good customer outcomes. By having these expectations in place, we are committed to offering products and services that are fit for purpose.

We are committed to making sure that we are accessible and inclusive with the information we share and the products we sell

We are committed to ensuring our communications are accessible to all of our audiences, and in particular customers, including those with disabilities or different communication needs. We make reasonable adjustments to accommodate diverse requirements, to ensure our messages reach and benefit a wide range of customers. We aspire to achieve a standard reading age of 11 for simplicity and clarity of our communications relating to products and services.

We have a dedicated vulnerable customer¹ team support our business to make new ways to make our products and services as accessible and inclusive as possible, please read more [here](#). We work to external accessibility guidelines so that customers with disabilities, different needs and impairments can access our products, services, and channels without facing barriers. Our proposition and service design and development will use accessible formats where possible or include alternate format options where possible for customers to access as needed. When communicating with our customers through our website, emails or letters we consider many factors to make the information as clear as possible. We look at things like, easy to read colours, font size and placement of words, and small print.

We are committed to adhering to regulations and strive to go above and beyond where we can.

We're dedicated to making sure our communications meet and exceed the obligations set out by regulators, authorities, and government. We work closely with key stakeholders to make sure that guidance and legislation is continually

¹ We use the FCA definition of a Vulnerable Customer: i.e., someone who, due to their personal circumstances, is especially susceptible to harm, particularly when a firm is not acting with appropriate levels of care.

reviewed against our own communication standards set out in our internal Group Communications Framework, and this includes:

- Consumer Duty
- Advertising Standards, including Anti-Greenwashing guidance from the ASA, CMA and FCA.
- We are creating Vulnerable Customer Digital Standards, covering auditing, testing, learning and more – making our platforms more tailored to those experiencing vulnerable circumstances.
- Vulnerable Customer Principles & Standards

Training

Training regarding vulnerable customers is provided to all colleagues and goes beyond proactively recognising the needs of vulnerable customers. It is aimed at supporting colleagues to recognise the needs of vulnerable customers and respond to these in their roles. Specific training is delivered to all staff involved in the creation of communications to ensure that they prioritise the understanding and meeting the needs of our customers.

We are working to create an internal digital champion network. The aim is to bring all our digital champions together to provide additional learning and support opportunities, peer learning, inspire the art of the possible and celebrate the difference champions can make. As well as supporting customers we are hosting in person digital learning events in the community, supported by our trained digital champions and learning partners.

REVIEW OF THIS POLICY

This policy is owned by Ben Rhodes, Brand Director of Phoenix Group, and will be reviewed annually.