



CSR 2018 - 2019

Corporate Social Responsibility

Thank you for taking time to read our 2018 - 2019 Corporate Social Responsibility (CSR) Report.

I am really proud to share with you this inaugural report which details the progress we have made on our key CSR initiatives over the last year. The Goodbody name has been part of Ireland's economic story for over 140 years and CSR has always been embedded in our company, stemming from a lasting commitment to act responsibly and operate with the utmost integrity in the management of client assets entrusted to us. This is the first time we have consolidated and published our CSR activities.

As I reflect on the last couple of years, a few milestones stand out. The business has expanded into new areas as opportunities have arisen and we have grown our business internationally. Amidst significant change, Goodbody was accredited as one of the best large companies to work for in Ireland, making it the only Irish financial services firm in its category to achieve the designation in the 2017 - 2018 period. This has been a remarkable achievement and a testament to the strength of our firm's culture and the quality of our people.

Another personal highlight is the relationship and engagement that Goodbody has developed over the last 18 months with our chosen charity, Irish Motor Neurone Disease Association (IMNDA). Supporting the incredible work that this organisation does has been a true privilege - I am really pleased with the fundraising efforts that our staff have made and I hope, as a group, we have helped raise awareness for this charity and motor neurone disease.

The report showcases many other CSR activities and achievements to date, all of which match our core values as a firm. I want to particularly thank the members of our CSR committee who have been the driving force for both new initiatives as well as making improvements to what we already had in place.

I am gratified at what we've accomplished so far. And we are committed to doing even more in 2019 and beyond, fully supported by the Goodbody board. I would like to take this opportunity to thank you for your continued support of Goodbody over the last number of years, without which we would not be positioned as strongly as we are today.












Roy Barrett
Goodbody Managing Director

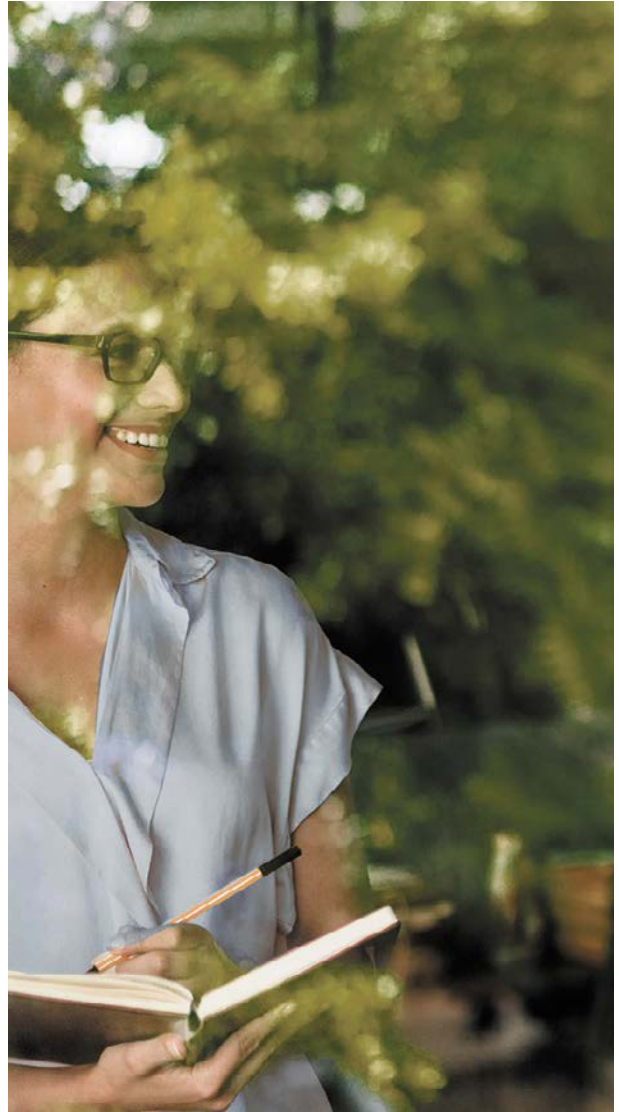
Corporate Social Responsibility (CSR)

refers to companies taking responsibility for their impact on society. It is a concept whereby enterprises integrate social and environmental concerns into their mainstream business operations on a voluntary basis.

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Our corporate
social responsibility
activities fall under
four pillars



01

Environment

- Reduce energy consumption in the buildings where we operate.
- Employ sustainable procurement policies.
- Reduce waste throughout our office network.
- Increase awareness amongst colleagues to support environmental protection and sustainability initiatives.

02

Community

- Support and champion initiatives that have a lasting impact on people and organisations in our chosen communities.
- We encourage the active engagement of our employees with these organisations which include volunteering of our time and expertise as well as raising much needed funds for these organisations where appropriate.



03

Workplace

- Focus on the wellbeing and development of our company's employees.
- Provide a supportive and engaged environment for staff through initiatives that target work-life balance, health and wellbeing, diversity and inclusion.
- Provide opportunities for our staff to get involved in volunteering and community-led programmes and initiatives.

04

Marketplace

- The customer is at the very centre of our business and we aim to always put their interests first.
- We commit to operating in an ethical and sustainable manner in all of our dealings with our customers, suppliers and the wider industry.
- We will apply similar principles to procurement - we hold all of our suppliers to the same standards as we aim to achieve ourselves, in terms of client service, ethics and sustainable policies.

CSR Committee and Framework

The Goodbody CSR Committee

The Goodbody CSR Committee (“the Committee”) was founded in Q1 2016 to oversee, coordinate and develop awareness of the firm’s CSR activities.

The Committee is comprised of the following:

- a chairperson who is elected by the committee members,
- an elected member from each of the CSR working group streams (see CSR Pillars),
- a member of the branding/marketing team, and
- two other members appointed by the Managing Director.

Appointed Committee members are reviewed every 18 months. Committee members can hold a maximum of two consecutive 18 month terms. The Committee meets monthly.

The core duties of the Committee are as follows:

- Oversee and coordinate the firm’s CSR activities.
 - Develop awareness of the firm’s CSR activities.
 - Coordinate centralised communication of CSR activity.
 - Drive board level and executive level engagement and awareness.
 - Present annually on the firm’s CSR strategy and approach at one of the company’s quarterly presentations.
 - Publish a calendar of CSR activity annually.
 - Maintain a central catalogue of all CSR activity.
 - Survey staff annually to assess awareness of the company’s CSR initiatives.
 - Determine high level selection criteria for our charitable efforts and consider brand matching e.g. domestic/international, elderly, education, children, etc.
 - Ensure that a monthly communication is sent on CSR. This will be comprised of an update from each one of the CSR streams on a rolling basis, upcoming events and any other CSR communications.
-

The Goodbody CSR Framework

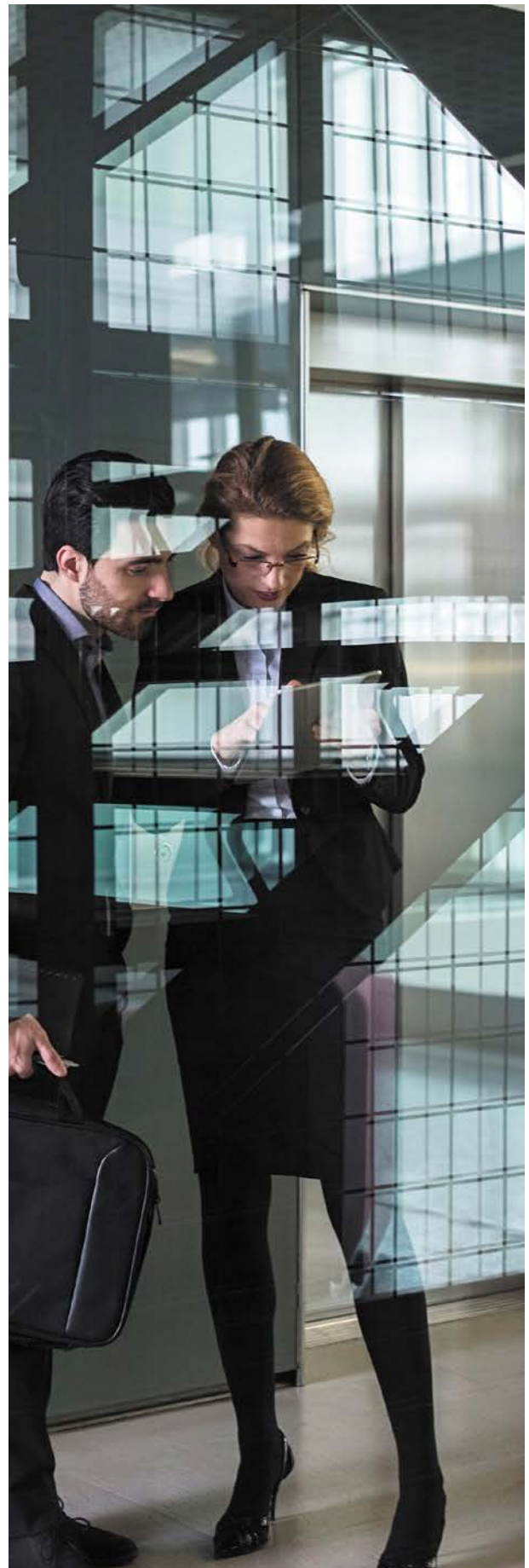
The Goodbody CSR Framework is a statement on the firm's approach to taking responsibility for and delivering positive impact on social, ethical, environmental and consumer matters and ensuring this forms an integral part of our day-to-day business.

It entails setting out, as a company, the standards that we hold ourselves up to in relation to how we deal with our employees, customers, suppliers and society at large and lays out what we are doing to improve these interactions through a motivated and engaged staff. The core objective is to create a framework to deliver a sustainable business that proactively attempts to maximise its positive impact on society and the environment.

A central objective of the Goodbody CSR initiative is to drive staff action, engagement and commitment in the delivery of each of the core CSR objectives. We strive to have our CSR framework represented and managed by people from all across the company, irrespective of seniority or length of service. We encourage participation from staff across all parts of our business.

The CSR Committee identified the following principles as key to its effectiveness and efficacy over the long-term:

- Sponsorship from the top is vital.
- A pre-publicised plan/calendar is essential.
- Centralised and coordinated communication approach.
- Maintenance of a central CSR activity catalogue.



Enviro nment

How our business activities impact on the environment is something we are acutely aware of - we are striving to continually find ways to operate in an environmentally responsible manner and we are committed to reducing our carbon footprint.

In 2016, Goodbody conducted an internal review which identified clear areas of focus for us to pursue. This framework has also allowed us to engage with stakeholders over time on both progress and measurement. Our key areas of focus are to reduce energy consumption and waste.

01



Reduce Energy Consumption and Waste

We are committed to reducing the consumption of energy, waste and water throughout our office network.

We have calculated our environmental impact and commenced initiatives to improve energy efficiency and reduce waste. We have been collaborating with our vendors to provide price-neutral (or low-price differential) products that conserve energy, reduce waste and are manufactured from more sustainable materials.

Engaging with our staff about ways to reduce our energy consumption has also yielded some great initiatives to date and we will continue to have a dialogue with staff around improvements we can make. Moreover, by creating awareness amongst our colleagues and customers to support company-wide environmental protection and sustainability initiatives, we hope that this will have a positive knock-on impact in relation to our staff's approach to energy consumption and waste management in their homes and personal lives.

Statistics presented relate to the 18 month period from 1 January 2017 - 30 June 2018 unless otherwise stated.



reduction in client
paper dispatches

37 bikes

provided through the
Bike to Work Scheme

Energy Consumption

Following a refurbishment in 2014 of the Dublin head office, we installed energy saving light fittings throughout the Ballsbridge property. We introduced measures to reduce our use of electrical energy including the systematic switching off all lights and air conditioning in the evening by on-site security and the use of passive infrared sensors (PIR) on lights in some areas. We also migrated our Comms Room IT equipment to external data centres to avail of economies of scale and we now exclusively use 'Energy Star' rated IT hardware.

In 2018, we engaged an electrical consultant to undertake a survey of the energy-saving benefits of replacing all light fittings in Ballsbridge with an LED option. We anticipate undertaking this project over the coming year. We will also continue to monitor advances in energy efficient lighting, heating and technologies and deploy to our office network where it is deemed appropriate to do so.



-1%

electricity usage
2016 - 2017

Waste Initiatives

Goodbody is working actively with our building managers and our waste processing partners to continue to reduce the impact of our waste on the environment. We have introduced segregated waste streams including recycling, glass and compostable materials on every floor of our building across the office network as well as collection points for used batteries. In an effort to materially reduce usage and/or eliminate the use of plastic or plastic coated cups, all employees have been issued with a 'keep-cup' for hot drinks as well as a reusable water bottle for water consumption. This initiative has been introduced to dramatically reduce the use of paper and plastic cups across our office network. Remaining disposable coffee cups have been replaced by fully recyclable alternatives and Goodbody has introduced fully compostable cutlery in place of the plastic options in 2018.

Conscious of the administrative and environmental burden we were placing with clients relating to the quantum of account information and correspondence, Goodbody introduced a 'go paperless' initiative in 2015. This programme encouraged Wealth Management clients to go paperless and access all statements, account information and other correspondence through our online platform, Goodbody Online. The initiative is ongoing and has been a highly successful campaign to date - the company has seen a significant reduction in paper dispatches over time. In addition, all new Goodbody Online clients are now automatically paperless from the outset unless they specifically request to 'opt in' to receiving account information through the postal network from us.

We have also made significant waste savings in the area of print management by introducing swipe card access and automatic timed system deletion of uncollected print jobs.

* Estimated annual saving following the introduction of the 'keep cup' initiative.

+80,000

paper cups
saved*



Comm unity

Supporting and championing initiatives that could have a lasting impact on people and organisations in our chosen communities is a core objective in our overall CSR strategy.

Given our corporate heritage, we also want to make a lasting contribution to the communities and causes we care about. Accordingly, we are committed to giving of our time, sharing key skills where required and making contributions to our selected charities and partners.

02



Supporting and Championing Initiatives

Goodbody Charities

At the beginning of 2017, it was decided that Goodbody would take a more focussed view on our charitable contributions and select one charity to work with over a two year period. Over the course of a number of months, the Goodbody Charity Committee undertook a selection process to choose this charity. Through staff consultation, 18 charities were nominated. Three of the nominations were shortlisted based on selection criteria and following presentations from the shortlist to the Committee, the Irish Motor Neurone Disease Association (IMNDA) was chosen.

For the duration of our work with the IMNDA, we have raised much needed funds as well as using our expertise in various areas to help the charity develop a good corporate structure.

Statistics presented relate to the 18 month period from 1 January 2017 - 30 June 2018 unless otherwise stated.

+500 students
participated in the 2017
Goodbody SMF initiative

€250,000+
raised through
IMMA 1000

Goodbody and the IMNDA

The IMNDA does incredibly important work in supporting people with motor neurone disease, their families, friends and carers. Goodbody is a principal corporate sponsor and we believe, given the energy and commitment of the Goodbody staff in fundraising events and activities, we can continue to raise significant funds, as well as awareness for a truly worthy cause. Fundraising events that have taken place to date include: white collar boxing, 6-a-side football, staff cycles, 'Ton of Cash' initiative, running events, staff raffles and bake sales.

We have also supported the IMNDA's annual calendar event 'Drink Tea for MND' on 21 June each year. In 2018, Goodbody was also the key sponsor for the 'Good Friday, Good Run' in St Anne's Park, Raheny.

About IMNDA

The Irish Motor Neurone Disease Association is the only organisation of its kind in Ireland. They are dedicated to working on behalf of people living with MND and their families and carers. Key services include home visits by three MND nurses, financial assistance towards home help and the supply of specialised equipment on loan. They also fund and promote research into the causes and treatments of MND. Their aim is:

- To encourage and promote the best methods of care, education, research and treatment for people with MND throughout Ireland, contributing to worldwide efforts in research and development of treatment.
- To establish and promote models of good practice in the delivery of specialised services to patients, their families and carers, setting standards of excellence.
- To communicate widely, knowledge of MND and related disorders in order to raise awareness in the wider community.

The IMNDA information services can make a real difference to how those diagnosed with the illness cope in the weeks and months ahead. MND is a life-changing illness and the IMNDA are dedicated to making each change as smooth as possible for all those directly or indirectly living with it.



Additional Sponsorships and Partnerships

SVP Annual Christmas Appeal - Giving Tree

In support of families in communities across Ireland celebrating Christmas, Goodbody takes part annually in the Giving Tree initiative in conjunction with St. Vincent de Paul. Staff are asked to donate gifts to make Christmas that little bit brighter for children and families who are struggling in our community.

Aidlink

Aidlink is an Irish development charity whose focus is on improving the lives of those living in poverty in Africa through local partnerships. A number of Goodbody staff are directly involved with this charity.

Regional Support

Goodbody supports various cancer services throughout Ireland through our offices in Cork, Galway and Kerry.



€100,000+
raised for IMNDA via
staff fundraising



Goodbody and IMMA

Launched in 2016, **IMMA 1000** is a ground-breaking fundraising initiative to support the future of Irish contemporary art. It directly supports the Irish Museum of Modern Art's (IMMA) work with Irish living artists through commissioning new work, paying artist fees for exhibitions, creating bursaries for studio residencies and buying artists' work for the National Collection. Goodbody is the exclusive corporate founding partner of the fund. Our investment in the concept and three-year commitment to the fund has enabled IMMA to reach and exceed its fundraising targets from private donors. To date, anchored by Goodbody's support, the fund has put €250,000 in the hands of Irish artists and will add a minimum of €50,000 to this amount in 2018 from funds already received. This is a huge achievement, and one of the largest funds for visual artists ever assembled in Ireland.

Our support of IMMA 1000 has been recognised with a nomination for the Best Large Sponsorship in the 2018 Allianz Business to Arts Awards.

As Ireland's longest established stockbroking firm, heritage and legacy are brand attributes that we and our clients highly value. Over the years Goodbody has made an important contribution to the economic development and growth of the Irish economy and wanted to expand that role more broadly into the arts.

Goodbody felt that a multi-year programme would be more impactful as part of its contribution to the future of Irish cultural heritage. That's why it made a firm commitment to contribute significant funds to this important initiative over three years. The management team was keen that the fund directly supports Irish living artists and believe that it plays a crucial role in supporting continued growth of Irish contemporary art and continued creativity in Irish society.

Within our CSR strategy under the Community pillar, this initiative has supported the work of a number of Irish artists over time and contributed to the National Collection. Goodbody understands the importance of creating a legacy today for future generations, and this core value is perfectly echoed in this fund. IMMA 1000 is a creative and dynamic way of bringing our brand values to light and reinforces Goodbody's investment in Irish society. We have been able to introduce clients and partners to IMMA, the IMMA 1000 initiative and Irish modern art via bespoke events at IMMA. The IMMA team has given us fantastic access including private tours with lead curators for our clients - these are unique intimate experiences and hopefully have showcased our commitment to IMMA, its work and the future of Irish modern art.



“ We believe artists deserve a secure place in Irish society. Goodbody wants to help build and sustain the cultural institutions that make art viable in Ireland. IMMA 1000 is a project of real ambition that we are honoured to support.

Roy Barrett, Goodbody Managing Director

Work place

Goodbody has been a feature of Irish corporate life and the economic landscape for over 140 years. Longevity in our industry is rare - Goodbody wants to ensure that trusting relationships remain the cornerstone of our business. Our people are therefore at the heart of what we do and are critical to why our client relationships and our brand have endured across generations.

To adequately support and engage our people to have successful and long-term careers in our company, Goodbody has put in place a number of initiatives and programmes that focus on both the career and personal development of our people.

03



Commit to Engage and Support Our People

Goodbody Wellbeing Programme

Goodbody is committed to supporting the health and wellbeing of employees and to providing a healthy and safe work environment for all our employees. The company believes that a healthy workforce will create a productive environment in which organisational goals are met.

Through our Wellbeing Programme we promote a healthy organisation such that physical and mental health is valued and prioritised. To ensure that adequate focus was placed on this important area, a dedicated in-house committee responsible for delivery of initiatives was introduced in 2017. The team has introduced a number of important measures including but not limited to: financial wellbeing, mental health awareness campaigns, promotion of healthy eating through our free fruit initiative, and the availability of health screening for staff. In coordination with other CSR work streams, many staff activities including charitable fundraising and social activities are designed with a wellbeing lens and focus on physical activities and fitness challenges. All employees of the company are invited and encouraged to attend regular wellbeing events throughout the year and to utilise the wellbeing resources provided by Goodbody. In 2018, the company launched a wellness room for staff in the Dublin office.

Since the beginning of 2017, a selection of wellbeing themed events and seminars have included:

- Mental Health Awareness.
- Wellbeing Seminar: Building Resilience.
- Internet Safety for Parents.
- Goodbody Wellbeing Health Station.
- Your Wellbeing and the Team.

We undertake individual workstation and ergonomic assessments and eyesight (Visual Display Units) testing. We have trained a number of staff in first aid and defibrillators have been installed throughout our office network.

80% of staff

have participated in
at least one S&S event

Employee Assistance Programme

As part of our Wellbeing Programme, we provide an Employee Assistance Programme that includes professional services specifically designed to support staff and improve wellness and healthy functioning in the workplace. The Goodbody Employee Assistance Programme is provided by external counsellors/EAP professionals and helps assist in identifying and resolving employee personal concerns, including, but not limited to, health, marital, family, financial, alcohol, drug, legal, emotional, stress, or other personal issues.

The Goodbody Sports & Social Committee

The Goodbody Sports & Social (S&S) Committee was re-launched in 2015. Its brief is to help support employee emotional and physical wellbeing and help build employer-employee relationships. An emphasis has been placed on organising inclusive social events that are scheduled throughout the year. This gives staff regular opportunities to get to know colleagues and the wider Goodbody team in a social setting, especially recent joiners to the Company.

Since its re-launch, the S&S committee has organised numerous events to suit all tastes ranging from table quizzes and golf scramble challenges to subsidised yoga and pilates classes on-site. The firm also supports two flagship events in the calendar year for all staff: The Spring Ball and Summer BBQ. The team has also been innovative and inclusive in approach - in 2016 for the first time, families of employees were included in a children's Christmas party and Santa Claus visit on-site.

These events throughout the year give employees the opportunity to interact across departments on a social level and encourage a team spirit atmosphere and sense of camaraderie within the firm.

15+

S&S unique event types

Staff Engagement Group

In 2017, colleagues were invited to put themselves forward as members of a Staff Engagement Group. The objective of this group is to provide employees and management with an alternative channel to receive and provide feedback and suggestions potentially outside of the direct manager approach and provide a forum for company-wide and departmental suggestions to enhance the overall Goodbody community experience.

This is a channel for Goodbody employees to have their voice heard, raise concerns and put forward ideas that may enhance the Goodbody working experience including:

- Development.
- Staff Engagement.
- Wellbeing Programme.
- Staff events.
- Internal communications.
- Performance management.
- Work environment.
- Goodbody policies and practices.

The purpose of the group is to provide a positive environment for staff to be involved in decision-making, leading to progressive change. Since its inception, the group of 15 cross-departmental volunteers has hosted 19 coffee mornings attended by over 200 staff.

Over 150 ideas across eight defined categories were put forward. The group is working with the management team on an ongoing basis regarding the successful execution and delivery of some of those ideas for our business.

150+ ideas

from the Staff Engagement Group

Learning and Development (L&D)

At Goodbody, we are committed to supporting the ongoing learning and development of all our people to positively impact our clients, the business environment and our community. We recognise that this culture of learning supports colleagues' ongoing professional and career development and encourages talented employees to join and remain with Goodbody.

In this fast-paced business environment, staff need the requisite skills and adaptability, to deal with rapidly changing regulatory, technological, competitive and client needs. This is why Goodbody has committed significant resources to developing an effective Learning and Development strategy for the 300+ strong staff and the organisation as a whole. Accordingly, Goodbody has in place a dedicated L&D professional to drive L&D efforts in line with the firm's overall strategic direction.

Goodbody initiatives to support ongoing career and personal development include bespoke training, educational assistance, mentoring and coaching as well as specific programmes at key career transition stages. Goodbody operates in a rapidly changing regulatory environment which presents substantial business impacts. To protect our clients, mandatory training modules in all aspects of regulation that impact investment firms is regularly undertaken.

Examples of specific L&D initiatives undertaken by Goodbody include:

- **The Goodbody Leadership Academy:** The creation of a pipeline of skilled and adaptable future leaders through dedicated leadership modules and, in teams, working on sustainable leadership community projects.
- **Business Development (BD) Academy:** In addition to formal BD training, there is an emphasis on continually enhancing BD acumen through providing colleagues with access to relevant BD resources and toolkits and encouraging colleagues to use this content within their own teams.
- **Professional Skills Development:** As well as a strong culture of on-the-job training, external education courses, focusing on professional skill development, sponsored by Goodbody, are also offered to staff.
- **Just-in-time Training:** The L&D strategy includes access to timely, relevant and immediately applicable essential skill building sessions.
- **Management Development:** Bespoke management development programmes are available for newly-appointed and more experienced managers. Management staff also attend external executive education courses as required.

Developing Future Goodbody Leaders

Since 2016, more than 10% of our colleagues have participated in the Goodbody Leadership Academy. The objective is to provide future leaders with an opportunity to develop skills and acumen in a continually changing work environment. Content includes modules on specific leadership elements. The interactive format of the facilitated modules allows participants to reflect on how they apply the learning to their own circumstances.

As well as significant input from experienced colleagues, we partner with external experts in leadership development and strategy. Our 2018 Academy included participants, in teams, working on sustainable leadership community projects.



59 staff

sponsored in
further education

Great Place to Work

Having participated in the Great Place to Work survey since 2015, Goodbody was accredited as one of the best large companies to work for in Ireland, making it the only Irish financial services firm in its category to achieve the designation in 2017 - 2018. In terms of the scale of the achievement, just 29 large companies (i.e. 250 or more employees) achieved the requisite mark in Ireland, of which 70% are multinationals.

Great Place to Work surveys and scores companies and a range of criteria, including client service, strategy, communication, corporate social responsibility, and rewards. The certification is highly beneficial to Goodbody's ongoing recruitment in the highly competitive financial services sector. The recognition by Great Place to Work also benchmarks Goodbody globally and positions the firm to compete more effectively for corporate business, where CSR is becoming an important differentiator.

“ We have been on this journey for the last three years and it is an excellent achievement for everyone in Goodbody in obtaining the certification.

Roy Barrett, Goodbody Managing Director





The Goodbody Student Managed Fund


In 2015, Goodbody entered a partnership with the students of University College Dublin (UCD) to help create an investment fund that is managed almost entirely by students and operates as a club within the University throughout the academic year. Goodbody not only provided funding for this initiative, it also developed an education programme for the participating students from market experts across Goodbody.

Since its inception, Goodbody has extended the UCD partnership model to a number of additional universities across Ireland including University College Cork (UCC), NUI Maynooth University, and Dublin City University (DCU). Students from Dublin Institute of Technology (DIT) will also participate in the 2018 programme. Up to 30 Goodbody staff annually volunteer their time to support undergraduate students to get real, hands-on experience of managing equity funds through this important education initiative.

The education programme we have put in place to support this initiative gives undergraduates at all stages exposure to a variety of disciplines such as research, asset allocation and portfolio management. Seed capital is allocated to each fund as well as certain fund parameters. Students then organise themselves into equity sector specialist sub-groups to carry out research on their given sector and generate stock ideas within their sector allocation. Each stock idea must be presented to an investment committee who decide what ideas qualify for investment in their respective funds and how much of the fund's capital to invest.

As the funds have grown, we have now introduced a competitive dimension as the university funds go head to head in an annual presentation and performance review, judged by senior investment professionals from Goodbody. Returns generated by the individual funds can be extracted as contributions to university charities or charities selected by the student members.

Getting involved with the Goodbody Student Managed Fund programme provides students access and engagement with industry professionals including mentoring and networking as well as hands-on experience and learning so they can be better equipped when they enter the workforce, particularly in the areas of wealth management, asset management and investment banking.



“ The initiative gives undergraduates across Ireland exposure to a variety of disciplines such as research, asset allocation and portfolio management. Goodbody is really proud of our long-term involvement in this important community education programme.

Roy Barrett, Goodbody Managing Director

Market place

The Goodbody Marketplace pillar focuses on how our organisation manages its relationships with customers, suppliers and other stakeholders. Goodbody has always ensured that trusting relationships remain the cornerstone of our business. By acting responsibly, being transparent and focussing on the long-term versus our own short-term advantage, both our client relationships and our brand have endured across generations. We apply this same discipline and integrity of approach to all our client relationships - we have core principles in place that guide how we interact with both product providers and clients.

04



Earn and Maintain Our Clients' Trust

By adhering to these pillars of business conduct to clients, it sets a strong foundation from which we can earn and maintain our clients' trust and foster successful long-term business relationships.

As we undertake to operate in an ethical and sustainable manner in all of our dealings with our clients - we hold all of our suppliers to the same standards as we aim to achieve ourselves, in terms of client service, ethics and sustainable policies.

Regulatory Compliance

Goodbody is also committed to complying with all relevant regulations that are in place for the purposes of investor protection. Our industry has undergone significant regulatory change following the introduction of MiFID II in January 2018. MiFID II is a European Directive that governs the provision of investment services in financial instruments. It provides additional protection and increased transparency for investors and consumers of investment services across the European Union (EU). MiFID II replaces the original Markets in Financial Instruments Directive (MiFID I) which was introduced in November 2007 to harmonise the regulation of investment services within the EU.

This new regulation applies to investment firms such as Goodbody. It also impacts on trading venues, market operators, alternative investment fund managers, investment intermediaries, data reporting services providers as well as third-country firms providing

investment services in the EU. Authorities, such as the Central Bank, and European Supervisory Authorities, now have the ability to restrict or suspend the marketing and/or sale of financial instruments under certain circumstances when elevated investor or financial stability risks exist.

To achieve its aim of enhanced client protection, investment firms must provide clients with more information and documentation to ensure that clients fully understand the service offered and can confirm that it is appropriate to meet the investment objectives of the client. This process ensures that firms such as ours can align our investment advice and service accordingly. To adhere to the new regulations, Goodbody put in place a number of workstreams during 2017 so that appropriate enhancements were made before MiFID II came into effect.

Areas of focus included but were not limited to:

- transaction reporting,
- suitability statements,
- client reporting,
- key policies,
- conduct of business rules, and
- disclosure criteria.

We also initiated communications with clients prior to the implementation date to fully brief them of the relevant changes, where appropriate, to the administration of their account and what the new regulation might mean for them.

The General Data Protection Regulation (GDPR), also came into effect in 2018 and provides enhanced data protection and privacy rights to individuals. GDPR seeks to give individuals more control over how organisations use and secure their personal information. Goodbody has always been committed to respecting the privacy of our client data and all personal information in our possession is held securely and treated with the utmost care.

To demonstrate GDPR compliance, Goodbody leveraged the existing control framework and data protection controls that were in place and made enhancements in the following areas as part of the Goodbody GDPR programme:

- Policies and Procedures: Full review and update of policies and procedures to ensure we have a robust GDPR framework.
- Ensure strong practices in relation to security, access management, storage, backup/recovery, etc. are maintained.
- Ensure appropriate controls are in place for Data Protection Impact Assessments (DPIAs) and Risk Assessments.
- Align client, employee and service provider agreements to GDPR. Perform due diligence on key providers.
- Well-defined arrangements for incident handling and reporting of breaches.
- Ensure appropriate training and awareness within the organisation (Board, Management Team, Staff, etc.).

To be a Goodbody supplier you are required to provide details on CSR as part of our formal Request for Proposal (RFP) procurement process. We typically ask the following questions of potential suppliers:

- Submit a copy of your organisation's environmental policy, if any.
- Detail any environmentally friendly schemes that your organisation has supported as well as any awards or certification that your organisation has received with regard to environmental matters.
- Detail your organisation's policy with regard to using environmentally friendly products.

The detail provided is assessed as part of vendor selection. Suppliers of electrical and electronic equipment also have to ensure they comply with environmental legislation. Waste contractors must provide a statement on how they dispose of waste they collect from us, and we measure selected contractors performance on an ongoing basis. Our policy is for suppliers who do most to reduce their environmental impact to have a better chance when bidding for our business.



