

## 1 Why we need this policy

Talent development encompasses a set of essential practices that support the execution of Nedbank's strategy and culture. At Nedbank, the focus is on equipping individuals with the right knowledge, skills, abilities, experience and exposure to drive the bank forward and achieve the goal of becoming the 'most admired financial services provider' in Africa. We are committed to enabling employees to perform to their full potential by creating a great place to learn and grow.

This policy sets the framework for the talent development strategy to be implemented across all business units to benefit both Nedbank and its employees.

## 2 Goals of this policy

- Provide continuous learning opportunities that align with the bank's core and future skills requirements to support its strategic goals.
- Improve the performance of employees in their current role.
- Support employees in achieving their career development goals.
- Develop leaders as enablers of a high-performance culture that drives personal growth, career mobility and retention.
- Ensure compliance with industry regulations and standards.
- Meet regulatory requirements about continuous professional development.
- Drive and accelerate transformation.
- Foster a culture of continuous improvement and innovation.
- Contribute to the building of a skilled South African society in line with our purpose to do good through our financial expertise.
- Direct and optimise funding to support intentional skills and capability building aligned with operating model changes that demands new organisational skills and an evolved capability profile.

By achieving these objectives, Nedbank aims to do the following:

- Improve individual and organisational performance.
- Mitigate people risk and enable business continuity.
- Build a skilled and mobile workforce that enables business delivery now and into the future.
- Develop strong talent pipelines to support succession planning, talent hot spots and scarce skills.
- Drive transformation of the workforce demographics.
- Build current and future capabilities needed for an ever-evolving operating model.
- Comply with regulatory requirements about continuous professional development.

## 3 Where this policy applies

- Full-time, part-time and temporary employees.
- Fixed-term contractors as well as agency and labour broker resources.
- Temporary service.
- Statements of work, independent contractors and personal service providers.

All entities in Nedbank Group and its subsidiaries must apply this policy uniformly in their respective jurisdictions, except if it conflicts with local statutes or regulations, in which case those statutes or regulations will apply.

## 4 Key principles

The key principles of this policy are summarised as follows.

### 4.1 General principles

All employees are accountable for their own development and growth. This includes identifying their learning needs and seeking opportunities for growth.

All employees must have access to development opportunities that are directly aligned with the skills and knowledge required in their current and future role.

Employees must have access to development that will prepare them for opportunities outside their current role or job family and beyond Nedbank.

Employees must have access to a variety of learning resources, for example online courses, workshops, seminars, and on-the-job training, to ensure that they can choose the learning format that best suits their needs and preferences.

### 4.2 Strategic alignment

All learning initiatives must be directly linked to the strategic objectives and goals of both the bank and cluster or function.

Learning priorities and investment for both the enterprise and clusters will take the lead from the annual business strategy and Strategic Workforce Planning exercise. This will focus Learning and Development (L&D) efforts on developing priority skills that are critical to the bank's ability to deliver on its strategic objectives and stakeholder commitments.

### 4.3 Development plans

All employees must have a personalised development plan outlining their career aspirations, skill gaps, and the steps needed to achieve their goals.

Development plans must consider education, experience and exposure to ensure optimal balance of learning experiences.

Development plans must be discussed and agreed with line managers.

Development plans must align with the overall strategic goals of the bank to ensure alignment of employees' performance contribution to the broader business objectives.

Development plans must include development focus areas highlighted as part of the performance management process.

### 4.4 Development costs and expenses

Development activities that incur costs must be approved by the employee's line manager. This ensures that the expenditure is justified and aligns with the employee's development plan and business objectives.

Employees may be eligible for reimbursement of expenses related to approved learning and development activities. This could include costs for course materials, travel claims not catered for under the Travel Desk, and accommodation.

Employee claims must be recorded via the employee claims process.

Evidence of attendance must be submitted to the Learning Operations Team to ensure that the employee's record of learning accurately reflects learning activity.

### 4.5 Leadership development, formal development programmes and internal bursaries

To ensure:

- fair distribution of resources and opportunities; and
- a period of practical application of learning after the learning programme,

employees may not attend a leadership development programme, receive a new bursary, or take part in a learnership and/or formal programme in consecutive years.

An employee is eligible to be nominated for or to take part in another leadership development or formal programme or to receive a bursary only 12 to 24 months after completing a previous programme or bursary. Exceptions include critical

business or project requirements, role change, accelerated development and succession planning for key roles.

Employees cannot attend any of the above programmes and/or receive a bursary without going through the enterprise and cluster approval process.

Attendance of executive development programmes must be approved by the Group Talent Committee.

#### 4.6 Scheduling and attending training

If employees attend training not scheduled by the Learning Operations Team, for example a conference approved by their line manager, they must log it on Service Desk and submit proof of attendance.

Online training sessions will be recorded and accepted as attended based on the minimum attendance time for the session, which may require attending more than a set percentage of the time.

If employees do not attend the session without a valid reason, their cost centre will still be billed for the training cost, unless stated otherwise.

All formal programmes and attendance must be scheduled via the Learning Management System (LMS) to enable tracking and updating of employee records and support formal reporting.

#### 4.7 Development assessments

##### Purpose

The purpose of development assessments is to identify strengths as well as skills and development gaps, tailor learning opportunities, track development progress, and support career development.

##### Multiple methods

There are multiple ways to assess development to get a comprehensive view of an employee's development, including the following:

- Formal assessments (e.g. psychometric assessments, exams, project evaluations, performance reviews, 360-degree assessments)
- Informal assessments (e.g. observations, quizzes, self-assessment, peer review, client feedback)

Development assessments must align with specific learning goals and skills required for current and/or future roles. If development assessments will be used as part of a development intervention, they must be selected and managed in consultation with the Nedbank Assessment Unit.

##### Assessment results

Assessment results used for personal development must be clearly communicated and agreed upfront. Through informed consent, transparency about the use of results and stakeholder access must be ensured.

Assessment results must:

- inform development needs and be included in an employee's individual development plan to support tailored and intentional skills building; and
- be used, stored and destroyed in line with the Talent Assessment Policy and its procedures.

Only assessment professionals who are registered with the Health Professions Council of South Africa (HPCSA) and have the required skills and qualifications may give feedback on psychometric assessment results. Feedback can be obtained by logging a request via Service Desk with the Assessment unit.

Development assessments cannot be used for any other purpose but to identify and inform employee development.

#### 4.8 Access to learning

All employees must have access to learning and development opportunities, including access to digital resources and platforms based on role requirements, regardless of their location or physical abilities.

The bank must leverage technology to deliver learning solutions that cater to a hybrid workforce. This includes online courses, virtual workshops, and other digital learning tools.

Access to digital learning platforms and/or solutions must be in line with country specific regulations, organisational policies and data protection regulations.

##### Personal devices

Personal devices must be enrolled via the Intune Company Portal to access the Nedbank network. These devices may not be jail-broken and must have the latest operating system installed. Applications approved for use on the Nedbank network must be installed via the Intune Company Portal.

#### 4.9 Employee research proposals and studies

Employees who need to complete a research proposal as part of their postgraduate qualifications and wish to use Nedbank as their research organisation must adhere to the following requirements:

- Employees must obtain initial written permission from a divisional executive committee member to do research and must submit a detailed research proposal outlining the objectives, methodology, expected outcomes, and relevance to their role and the bank.
- The line manager, cluster L&D manager and cluster human resources (HR) executive must review and approve the proposal.
- Employees must complete and sign a request for permission to do research at Nedbank. This includes signing a non-disclosure agreement (NDA) that can be obtained from Group Legal. Employees must obtain the signature of 2 authorised people to sign the NDA on behalf of Nedbank. Authority to sign will be according to Nedbank Limited Board resolutions and delegation of signing powers (a schedule of delegation of authority or power-of-attorney document).
- The signed NDA must be returned to the employee's line manager for safekeeping.

#### 4.10 Return on investment

Clear and measurable objectives must be established for every development goal on a development plan and/or learning initiative to track progress and determine if the outcome has been met successfully. Measures include the following:

- Performance metrics such as productivity, quality and efficiency.
- Behavioural metrics that indicate a change in employee behaviour and skill application post-development.
- Improved readiness to move to a future role.

#### 4.11 Skills development

Funding applications for skills development must align with the bank's strategic goals as well as the national skills development strategies informed by sector skills plans. This ensures that the investment in employee development is aligned with industry and company objectives.

#### 4.12 Compliance with the Financial Advisory and Intermediary Services Act, 37 of 2002

Employees must meet the regulatory fit-and-proper requirements of the Financial Advisory and Intermediary Services Act (FAIS), 37 of 2002, with regard to the following:

- Achieving qualifications recognised by the Financial Sector Conduct Authority.
- Passing the relevant regulatory examinations such as RE1, RE2, RE3, RE4 and RE5.
- Completing cyclical continuous professional development to maintain competency.

#### 4.13 Learning and Development vendors and suppliers

Only active suppliers with existing agreements may be engaged for development services. The responsibility to ensure that a supplier is active resides with the employee who can confirm the status of the supplier with Procurement.

Engaging suppliers on technology solutions or solutions that have technology elements require approval from the centre of

excellence (COE). These engagements must follow the Vendor Management Office (VMO) processes to ensure that the required technology architecture considerations and information security checks are performed and that the solutions are accessible to all intended learners. This applies to onboarding vendors with new technology solutions and amending contracts where part of a solution may require a technology component.

#### 4.14 Data security

The privacy and confidentiality of employee personal and education information must be ensured in line with the Protection of Personal Information Act (POPIA), 4 of 2012. Employee information may be shared with vendors only if specific requirements must be met. This must be done in line with prescribed processes as documented in relevant policies to ensure the privacy of the information.

### 5 Who does what

All employees, individually and collectively and regardless of their functions and job descriptions, are responsible for implementing and ensuring that this policy's principles are adhered to.

#### 5.1 COE Talent Development and Enablement

CEO Talent Development and Enablement is responsible for the following:

- Developing and communicating a strategy for L&D that aligns with the bank's overall goals and objectives.
- Integrating the L&D strategy with other HR practices, such as Strategic Workforce Planning, Talent Management, Culture and Leadership, to support a comprehensive and cohesive people strategy.
- Developing and implementing solutions that address current and future skills demands, mitigate people risk and enable business continuity.
- Enhancing overall organisational efficiency and performance by improving the bank's skill profile.
- Developing high-potential employees, successors and prioritised talent segments and pools to support the bank's talent strategies.
- Promoting a culture of continuous learning and development within the bank.
- Assessing and authorising new learning technologies to ensure that they align with the bank's requirements. This includes evaluating the potential impact of these technologies on the learning ecosystem and architecture to ensure seamless integration with existing systems.
- Leveraging digital tools and platforms to offer flexible and innovative learning opportunities and experiences.
- Creating and maintaining L&D policies, ensuring that they are up to date and aligned with best practices and organisational needs.
- Overseeing all development practices within Nedbank to ensure practices comply with relevant legislation and regulations.
- Establishing and enforcing standards and best practices for all L&D activities to ensure consistency and quality.
- Working closely with HR, L&D practitioners, and other stakeholders to ensure L&D initiatives meet the needs of the bank.
- Staying abreast of emerging trends and innovations in the field of learning and development.
- Researching and implementing new learning technologies and methodologies that can enhance the effectiveness of L&D delivery and initiatives.
- Establishing partnerships with external training providers, academic institutions, and industry experts to bring in diverse perspectives and expertise.

#### 5.2 Employee Services: Learning and Development

Employee Services: Learning and Development provides centralised support and resources to ensure the efficient and effective delivery of learning and development initiatives across the bank. Key responsibilities include the following:

- Managing the logistics of development programmes, including scheduling, communication, and participant tracking for group and cluster initiatives.

- Enabling self-help by automating certain tasks, processes and procedures pertaining to enrolments and venue bookings.
- Facilitating payments to vendors for training services rendered.

The Skills Development function ensures compliance and risk management of relevant legislations by fulfilling the following roles:

- Advising Nedbank on the National Skills Development Strategy (NSDS) and the implementation of the Workplace Skills Plan.
- Serving as an expert resource to accredit Nedbank as a training provider and implement appropriate learnerships and skills programmes.
- Serving as the contact person between the employer and the relevant sector education and training authority (Seta).
- Completing and submitting the Workplace Skills Plan (WSP) and Annual Training Report (ATR) to enable participation in skills development grants.
- Managing the relevant Seta grant application and payment process.
- Enabling the section 12H tax learnership rebate.
- Managing Nedbank's compliance risk in terms of skills development related to the:
  - Skills Development Act, 97 of 1998;
  - National Qualifications Act, 67 of 2008;
  - Skills Development Levies Act, 9 of 1999;
  - South African Qualifications Authority Act, 58 of 1995;
  - Broad-based Black Economic Empowerment Act, 53 of 2003;
  - Basic Conditions of Employment Act, 75 of 1997;
  - Labour Relations Act, 66 of 1995; and
  - Employment Equity Act, 55 of 1998.

#### 5.3 Cluster or functional Learning and Development partners

Cluster or functional L&D partners are responsible for the following:

- Partnering with the COE to implement enterprise learning initiatives and solutions and collaborate on shared focus areas to ensure integrated and aligned solutions.
- Creating and executing learning strategies and programmes that align with the cluster's business and people strategic goals and objectives.
- Integrating the cluster L&D strategy with other HR practices such as Strategic Workforce Planning, Talent Management and Culture and Leadership to support a comprehensive and cohesive people strategy for the cluster.
- Developing and implementing solutions that address current and future skills demand, mitigate people risk and enable business continuity.
- Improving cluster efficiency and performance by enhancing employees' skills through targeted development initiatives and continuous learning opportunities, as well as fostering a culture of growth and continuous learning.
- Developing high-potential employees, successors and prioritised talent segments or pools to support the cluster and/or functional talent strategies.
- Setting clear, measurable objectives and impact metrics for learning initiatives, tracking progress, and evaluating whether the desired outcomes have been achieved.
- Using data analytics to inform skilling strategies and evaluate the impact of learning initiatives on business performance.
- Ensuring compliance with internal policies and standards as well as all legislation and the requirements of national bodies.

#### 5.4 Line managers

Line managers are responsible for the following:

- Fostering a culture of growth and continuous learning by encouraging employees to take charge of their own development, availing development opportunities and providing time for and access to learning.
- Identifying skill gaps and development needs within their teams and for individual employees and implementing plans to address these gaps, ensuring they are included in employee development plans.

- Engaging in individual career discussions with employees, identifying current performance gaps and focusing on future skill requirements and/or career progression opportunities.
- Assisting employees with developing career plans that outline potential mobility paths, for example transferring to different departments, taking on new responsibilities, advancing in their careers, or making lateral moves.
- Assisting employees with acquiring new skills needed for different roles within the organisation, thereby facilitating both lateral and upward mobility.
- Providing coaching and mentorship to employees and offering guidance and practical support to enhance performance and address development gaps.
- Conducting regular performance and development discussions to help employees identify their strengths, identify areas for improvement and provide feedback on development.
- Ensuring that employees have access to the necessary learning resources that align with their role requirements and supporting their agreed development plans.
- Monitoring the progress of their team members' development, offering continuous support and making necessary adjustments to development plans as needed.
- Ensuring the application of learning and assessing the impact of learning on both employees and business performance.

**5.5 Employees**

Employees are responsible for the following:

- Being accountable for their own development and growth. This includes allocating time for learning as well as identifying their current learning needs and career aspirations.
- Proactively seeking feedback on performance and development areas from managers, peers, clients, and stakeholders.
- In collaboration with their line manager, creating a personal development plan that is focused on current development gaps and future career goals. This plan must include specific actions and timelines as well as address development feedback provided by stakeholders and/or development assessment outcomes.
- Monitoring and tracking progress on their development plan and making necessary adjustments as needed.
- Using the learning resources provided by the bank to support continuous upskilling and reskilling efforts.
- Ensuring the practical application of learning after the completion of a learning intervention.
- Actively seeking new opportunities for growth and development. This includes volunteering for projects, taking on leadership roles, and exploring cross-functional opportunities.
- Contributing to a culture of continuous learning and improvement through actively sharing skills and knowledge with peers.
- Providing feedback on the learning programmes and resources offered by the bank that will improve the quality and relevance of learning initiatives.
- Building a professional network within and outside the organisation that can provide support, mentorship, and opportunities for growth.
- Keeping up to date with industry trends, new technologies, and best practices.

**5.6 Non-compliance and deviations from the policy**

Non-compliance with the regulatory requirements of this policy may result in risk materialising in the group. The organisation may be exposed to reputational damage and financial loss in the form of fines and penalties as stipulated in the relevant regulatory requirements. Employees in breach of this policy will be dealt with in terms of the Group Disciplinary Policy and Procedure.

Deviations from the policy must therefore be approved by the policy owner and may not be granted for more than 12 months.

The policy owner must report approval of any material deviations to the relevant committee that approved the policy.

**6 Links to other group policies**

This policy is not independent of other group policies and must be read and implemented together with the provisions of the relevant regulatory requirements and the following Nedbank policies:

- Talent Management and Career Development Policy
- Talent Assessment Policy
- Code of Ethics and Conduct
- Internal bursary Policy
- Actuarial bursary Policy
- People Transformation Policy
- Contingent Workforce Procedure Guide

In addition, Learning and Development practitioners must refer to and understand the relevant pieces of legislation as they relate to this policy:

- Skills Development Act, 97 of 1998.
- Skills Development Levies Act, 9 of 1999.
- Employment Equity Act, 55 of 1998.

**7 Document control**

**7.1 The Nedbank Group Board**

The Nedbank Group Board (board) is ultimately responsible for the financial reporting and soundness of the group, including approval of these talent development principles. The board delegates responsibility for this policy to the Group HR Executive Committee (Group HR Exco), which will keep the board informed as well as jointly review this document annually to ensure it remains in alignment with other risk policies and is relevant to the group's future operations.

**7.2 Group Human Resources Executive Committee**

The Group HR Exco reviews this policy annually or sooner if there are developments necessitating a review.

**7.3 Enterprise-wide Human Resource Executive Committee**

The Enterprise-wide HR Exco proposes, approves and provides oversight of the implementation of all HR policies and the resolution of related issues being escalated from the cluster HR Exco.

**7.4 Employee Relations Unit**

The Employee Relations Unit will maintain the policy to ensure compliance with Nedbank's employee relations principles and applicable legislation.

**7.5 Document control table**

Date	Description	Reference
<Month YYYY>	<New policy created.>	<Role player>
<Month YYYY>	<Annual review: updated sections on roles and responsibilities.>	<Role player>