

IL&P GRI Content Index 2006



Global Reporting Initiative (GRI) Content Index

The Global Reporting Initiative (GRI) is a large network of thousands of experts, in dozens of countries worldwide, whose mission is to provide the global standards for sustainability reporting.

The GRI network has developed a [Sustainability Reporting Framework](#), the core of which is [Sustainability Reporting Guidelines](#). The Guidelines consist of principles for defining report content and ensuring the quality of reported information as well as standard disclosures comprising performance indicators and other disclosure items. These guidelines provide an internationally recognised framework for voluntary reporting on an organisation’s economic, environmental and social performance.

This index has been prepared using the current GRI Sustainability Reporting Guidelines (G3) and it provides a comprehensive listing of the GRI indicators reported by Irish Life & Permanent for 2006. We are reporting on all Core indicators and some Additional indicators, where they are relevant to our business. We have not reported on the financial services sector supplements for 2006, but will look to do this in future years. The index refers to information in our 2006 Corporate Responsibility Report, our 2005 Annual Report and Accounts and our website:

www.irishlifepermanent.ie

We self declare that we have applied the GRI Sustainability Reporting Guidelines (G3) to application level “B”. A “B” application level requires reporting on a specified range of criteria, management approach disclosures and a minimum of 20 performance indicators.

		2002 In Accordance	C	C+	B	B+	A	A+
Mandatory	Self Declared				<input checked="" type="checkbox"/>			
Optional	Third Party Checked							
	GRI Checked							

Legend

- **CR:** Corporate Responsibility Report 2006
- **AR:** Annual Report and Accounts 2005
- **Web:** Irish Life & Permanent plc website: www.irishlifepermanent.ie
- **NR:** Not reported – this indicator is currently not being measured or has not been reported on in IL&P’s CR report
- **NA:** Not applicable – this indicator is not considered relevant or material to IL&Ps’ operational activities

Content	Comment	Reference
1. Strategy & Analysis		
1.1 Statement from the most senior decision maker of the organisation (e.g. CEO, Chair or equivalent senior position) about the relevance of sustainability to the organisation and its strategy	<ul style="list-style-type: none"> • Message from the Chairman • Message from the Group Chief Executive 	CR pg 2-3
1.2 Description of key impacts, risk and	<ul style="list-style-type: none"> • Key Impacts and Challenges 	CR pg 3,5

IL&P GRI Content Index 2006

Content	Comment	Reference
3. Report Parameters		
Report Profile		
3.1 Reporting period (e.g. fiscal / calendar year) for information provided	Group overview	CR pg 31
3.2 Date of most recent previous report (if any)	Group overview	CR pg 31
3.3 Reporting cycle (annual, biennial etc)	Group overview	CR pg 31
3.4 Contact point for questions regarding the report or its contents	The way we do business	CR pg 5
Report Scope and Boundary		
3.5 Process for defining report content, including determining materiality, prioritising topics within the report and identifying stakeholders the organisation expects to use the report	<p>We identify our stakeholders by assessing who is significantly impacted by IL&P and who can have an impact on us.</p> <p>With due regard to the principle of materiality, we assess relevant importance of issues by considering the following factors:</p> <ul style="list-style-type: none"> • The organisation's overall values; • Concerns raised by stakeholders most affected by our business; • Financial and reputational impact on our business; and • Our impact on the community and the environment. 	
3.6 Boundaries of report (e.g., countries, divisions, joint ventures, subsidiaries, leased facilities, suppliers)	For the purposes of this report we have analysed and reported on all entities of Irish Life & Permanent except our minority interest in Allianz.	
3.7 State any specific limitations on the scope or boundary of the report	Reducing our impact on the environment Key Performance Indicators for 2006	CR pg 22
3.8 Basis for reporting on joint ventures, subsidiaries, leased facilities, outsourced operations and other entities that can significantly affect comparability from period to period and/or between organisations	For the purposes of this report we have analysed and reported on all entities of Irish Life & Permanent except our minority interest in Allianz.	
3.9 Data measurement techniques and the bases of calculations including assumptions and techniques underlying estimations applied to the compilation of the indicators and other information in the report	Data measurement techniques for the economic and many of the social performance indicators are based on existing business procedures and systems. In order to gather data on our environmental impacts we have engaged the services of an environmental consultancy firm who will be providing a skills transfer in 2007 to enable our own staff to compile the information in-house going forward.	
3.10 Explanation of the effect of any re-statements of information provided in earlier reports and the reasons for such restatement (e.g. merger/acquisitions, change of base years/periods, nature of business, measurement methods)	Making our company a better place to work Training and development	CR pg 20
3.11 Significant changes from previous reporting	There were no significant changes from pervious	

IL&P GRI Content Index 2006

Content	Comment	Reference
periods in the scope, boundary or measurement methods applied in the report	reporting period.	
GRI Content Index		
3.12 Table identifying the location of the standard disclosures in the report. ID the page numbers or web links	Online Index www.irishlifepermanent.ie	Web
Assurance		
3.13 Policy and current practice with regard to seeking external assurance for the report. If not included in the assurance report accompanying the sustainability report, explain the scope and basis of any external assurance provided. Also explain the relationship between the reporting organisation and the assurance provider(s).	We currently do not have plans to seek independent external assurance. However, we do value input from our stakeholders, and one of our stakeholders, BITCI, has reviewed and commented on the report before its publication.	
4. Governance, Commitments and Engagement		
Governance		
4.1 Governance structure of the organisation, including committees under the highest governance body responsible for specific tasks such as setting strategy or organisational oversight	Corporate Governance	AR pg 24-25
4.2 Indicate whether the Chair of the highest governance body is also an executive officer (and, if so, their function within the organisation's management and the reasons for this arrangement)	Corporate Governance	AR pg 24
4.3 For organisations that have a unitary board structure, state the number of members of the highest governance body that are independent and / or non-executive members	Corporate Governance	AR pg 24
4.4 Mechanisms for shareholders and employees to provide recommendations or direction to the highest governance body	Message from the Chairman	CR pg 2
4.5 Linkage between compensation for members of the highest governance body, senior managers and executives (including departure arrangements) and the organisation's performance (including social and environmental performance)	Directors Report on Remuneration	AR pg 29
4.6 Process in place for the highest governance body to ensure conflicts of interest are avoided	Corporate Governance	AR pg 24
4.7 Process for determining the qualifications and expertise of the members of the highest governance body for guiding the organisation's strategy on economic, environmental and social topics	Directors Report on Remuneration	AR pg 29
4.8 Internally developed statements of mission	The way we do business	CR pg 4-5

IL&P GRI Content Index 2006

Content	Comment	Reference
or values, codes of conduct and principles relevant to economic, environmental and social performance and the status of their implementation	www.irishlifepermanent.ie/ipm/corporateresp	Web
4.9 Procedures of the highest governance body for overseeing the organisation's identification and management of economic, environmental and social performance, including relevant risks and opportunities and adherence or compliance with internationally agreed standards, codes of conduct and principles	<ul style="list-style-type: none"> • The way we do business • Focusing on customers and excellence in customer service • Complying with regulations 	CR pg 5 CR pg 11
4.10 Processes for evaluating the highest governance body's own performance, particularly with respect to economic, environmental and social performance	Directors Report on Remuneration	AR pg 29-34
Commitments to External Initiatives		
4.11 Explanation of whether and how the precautionary approach or principle is addressed by the organisation	<ul style="list-style-type: none"> • Risk Management • Internal Controls 	AR pg 12-15 AR pg 26,27
4.12 Externally developed economic, environmental and social charters, principles or other initiatives to which the organisation subscribes or endorses	<ul style="list-style-type: none"> • FTSE4GOOD • EIRIS Governance Survey • Kempen / SNS Smaller Europe SRI Index • The Plain English Campaign • Global Reporting Initiative • Irish Bankers Federation (IBF) Voluntary Codes – including Code of Ethics • Irish Insurance Federation (IIF) Codes of Practice – including Code of Practice on Advertising & Sales Material <p>This is not an exhaustive list</p>	
4.13 Memberships in associations (such as industry associations) and / or national / international advocacy organisations in which the organisation has positions in governance bodies; participates in projects or committees; provides substantive funding beyond routine membership dues; or views membership as strategic	IBEC, Dublin Chamber of Commerce, Irish Insurance Federation, Financial Services Industry Association, Business in the Community Ireland, Financial Services Ireland, The Insurance Institute of Ireland. This is not an exhaustive list.	
Stakeholder Engagement		
4.14 List of stakeholder groups engaged by the organisation (e.g. communities, civil society, customers, shareholders and providers of capital, suppliers, employees and their trade unions)	The way we do business	CR pg 4
4.15 Basis for identification and selection of stakeholders with whom to engage	The way we do business	CR pg 4
4.16 Approaches to stakeholder engagement, including frequency of engagement by type and by stakeholder group	<ul style="list-style-type: none"> • Overall • Customers • Employees • Shareholders • Community • Suppliers 	CR pg 2 CR pg 7-9 CR pg 20 CR pg 2 CR pg 24-28 CR pg 11

IL&P GRI Content Index 2006

Content	Comment	Reference
4.17 Key topics and concerns that have been raised through stakeholder engagement and how the organisation has responded to those key topics and concerns, including through its reporting	As above	As above
5. Performance Indicators		
Economic		
Disclosure of Management Approach	<ul style="list-style-type: none"> • Policy • Goals and Performance • Additional Contextual information 	AR pg10-20
Economic Performance		
EC1 Direct economic value generated and distributed, including revenues, operating costs, employee compensation, donations and other community investments, retained earnings and payments to capital providers and governments		AR pg 38-47
EC2 Financial implications and other risks and opportunities for the organisation's activities due to climate change	Climate change implications are not currently measured.	NR
EC3 Coverage of the organisation's defined benefit plan obligations	<ul style="list-style-type: none"> • Pension Obligations • Retirement Benefit Obligation 	AR pg 55 AR pg 67-68
EC4 Significant financial assistance received from government	Irish Life & Permanent plc does not receive any assistance from the Irish government.	
Market Presence		
EC6 Policy, practices and proportion of spending on locally-based suppliers at significant locations of operation	www.irishlifepermanent.ie/ipm/corporateresp	Web
EC7 Procedures for local hiring and proportion of senior management hired from the local community at locations of significant operation	Operations are primarily focused in Ireland with a small operation in the UK. As a result the majority of our staff and management are recruited locally. Also, under Irish employment legislation disclosure of data on local hiring of senior management is illegal.	NR
Indirect Economic Impacts		
EC8 Development and impact of infrastructure investments and services provided primarily for public benefit through commercial, in-kind or pro-bono engagement	The only relevant infrastructure service is the staff swimming pool and gymnasium. This is open for use for the staff during the week and family members of staff on Saturdays.	
Environmental Performance Indicators		
Disclosure of Management Approach	<ul style="list-style-type: none"> • Policy • www.irishlifepermanent.ie/ipm/corporateresp • Goals & Performance • Organisational Responsibility • Training & Awareness • Monitoring & Follow Up • Additional Contextual Information 	CR pg 21-23 Web CR pg 21-23 CR pg 5 CR pg 21-23 As above As above
Materials		
EN1 Materials used by weight or volume	Given the nature of our industry the main material we use is paper and we currently do not have data on the volume of paper we consume. We will start gathering this information in 2007.	NR

IL&P GRI Content Index 2006

Content	Comment	Reference
EN2 Percentage of materials used that are recycled input materials	As above	NR
Energy		
EN3 Direct energy consumption by primary energy source	Reducing our impact on the environment Key Performance Indicators	CR pg 23
EN4 Indirect energy consumption by primary source	Reducing our impact on the environment Key Performance Indicators	CR pg 23
EN5 Energy saved due to conservation and efficiency improvements	Reducing our impact on the environment Energy reduction	CR pg 22
EN7 Initiatives to reduce indirect energy consumption and reductions achieved	The initiatives we have in place to reduce indirect energy consumption cover business travel and employee commuting. We have an IT premises in Cork and to reduce travelling between our Cork and Dublin offices we have installed video conferencing facilities in those offices. Also, in order to encourage staff to use public transport and leave their cars at home, we have signed up with the national bus and train service to provide a travel pass scheme where staff can purchase annual travel tickets at reduced prices.	
Water		
EN8 Total water withdrawal by source	Irish Life & Permanent does not have any industrialised processes which draw on water supply, other than standard 'domestic' use of toilets and washrooms, drinking water and water for cooking. More over, we are not charged for our water supply by consumption so measurement is not possible.	NA
Biodiversity		
EN11 Location and size of land owned, leased or managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas	Not specifically reported because no major impacts on biodiversity have been identified that would be associated with Irish Life & Permanent's activities.	NA
EN12 Description of significant impacts of activities, products and services on biodiversity in protected areas and areas of high biodiversity value outside protected areas	Not specifically reported because no major impacts on biodiversity have been identified that would be associated with Irish Life & Permanent's activities.	NA
Emissions, Effluents and Waste		
EN16 Total direct and indirect greenhouse gas emissions by weight	Reducing our impact on the environment Key Performance Indicators	CR pg 23
EN17 Other relevant indirect greenhouse gas emissions by weight	The only other relevant indirect greenhouse gas emissions that we record are from our company car fleet, which generate 4,241 tonnes of CO ₂ in 2005.	
EN18 Initiatives to reduce greenhouse gas emissions and reductions achieved	Reducing our impact on the environment Key Performance Indicators	CR pg 23
EN19 Emissions of ozone-depleting substances by weight	This is not reported by Irish Life & Permanent.	NR

IL&P GRI Content Index 2006

Content	Comment	Reference
EN20 NO, SO and other significant air emissions by type and weight	Irish Life & Permanent is a service providing company and does not have any other significant air emissions than those already reported on above.	NA
EN21 Total water discharge by quality and destination	This is not reported by Irish Life & Permanent as there are no significant discharges of water from our premises. More over, we do not pay for our water supply so measurement is not possible.	NA
EN22 Total weight of waste by type and disposal method	Reducing our impact on the environment Key Performance Indicators	CR pg 23
EN23 Total number and volume of significant spills	Not applicable – Irish Life & Permanent is a service providing company and we do not operate any industrial processes that may cause spillages.	NA
Products and Services		
EN26 Initiatives to mitigate environmental impacts of products and services, and extent of impact mitigation	Not specifically reported on as no major environmental impacts of our products or services have been identified and the nature of our products and services make this risk negligible.	NA
EN27 Percentage of products sold and their packaging material that are reclaimed by category	Our products are intangible in nature.	NA
Compliance		
EN28 Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with environmental laws and regulations	We did not receive any fines in 2006.	
Social Performance Indicators		
Labour Practices and Decent Work		
Disclosure of Management Approach		
	<ul style="list-style-type: none"> • Policy www.irishlifepermanent.ie/ipm/corporateresp • Goals & Performance • Organisational Responsibility • Training & Awareness • Monitoring & Follow Up • Additional Contextual Information 	CR pg 15-20 Web CR pg 15-20 CR pg 5 CR pg 15-20 As above As above
Employment		
LA1 Total workforce by employment type, employment contract and region	Making our company a better place to work	CR pg 16,17
LA2 Total number and rate of employee turnover by age group, gender and region	Making our company a better place to work	CR pg 16,17
Labour/Management Relations		
LA4 Percentage of employees covered by collective bargaining agreements	Approx 70%	
LA5 Minimum notice period(s) regarding operational changes, including whether it is specified in collective agreements	Eight-weeks for local negotiation – specified in permanent tsb's collective agreements but approach used across the group where possible.	

IL&P GRI Content Index 2006

Content	Comment	Reference
Occupational Health and Safety		
LA7 Rates of injury, occupational diseases, lost days, and absenteeism and number of work-related fatalities by region	Making our company a better place to work	CR pg 16,19
LA8 Education, training, counselling, prevention and risk control programs in place to assist workforce members, their families or community members regarding serious diseases	Given the geographic location and nature of our organisation the risk of serious disease specifically linked to occupation is minimal. However, we do provide education on preventative measures through our annual Health & Wellbeing programmes. We also provide risk control programmes in the shape of health screening programmes as well as subsidised life assurance and critical illness products and private health insurance for all staff.	CR pg 19
Training and Education		
LA10 Average hours of training per year per employee by employee category	Making our company a better place to work Training and development	CR pg 20
LA11 Programmes for skills management and lifelong learning that support the continued employability of employees and assist them in managing career endings	Making our company a better place to work Training and development	CR pg 20
LA12 Percentage of employees receiving regular performance and career development reviews	It is our policy that 100% of management and staff receive performance reviews at least once a year.	
Diversity and Equal Opportunity		
LA13 Composition of governance bodies and breakdown of employees per category according to gender, age group, minority group membership and other indicators of diversity	Making our company a better place to work	CR pg 16,17
LA14 Ratio of basic salary of men to women by employee category	1:1	
Human Rights Performance Indicators		
	<i>We apply the standards set out in the United Nations Universal Declaration of Human Rights and its Protocols; and the ILO Declaration on Fundamental Principles and Rights at Work of 1998, in so far as they are represented in Irish and European employment legislation.</i>	
Disclosure of Management Approach	<ul style="list-style-type: none"> • Policy: www.irishlifepermanent.ie/ipm/corporateresp • Goals & Performance – no specific goals on this issue due to the nature of our business and the markets in which we operate. • Organisational Responsibility • Training & Awareness • Monitoring & Follow Up – no specific data on performance on this issue. • Additional Contextual Information – as above 	Web CR pg 5 CR pg 17,18
Investment and Procurement Practices		
HR1 Percentage and total number of significant investment agreements that include human rights screening	As our operations are primarily based in Ireland and are of a service nature, the risk of human rights abuses is considered minimal hence no human rights	NA

IL&P GRI Content Index 2006

Content	Comment	Reference
	screening is in place.	
HR2 Percentage of significant suppliers and contractors that have undergone screening on human rights and actions taken	Irish Life & Permanent currently do not collect this information.	NR
HR3 Total hours of employee training on policies and procedures concerning aspects of human rights that are relevant to operations, including the percentage of employees trained	Making our company a better place to work Employment of people with disabilities	CR pg 17-18
Non-Discrimination		
HR4 Total number of incidents of discrimination and actions taken	We currently do not report on this indicator.	NR
Freedom of Association and Collective Bargaining		
HR5 Operations identified in which the right to exercise freedom of association and collective bargaining may be at significant risk and actions take to support these rights	All Irish Life & Permanent staff have the right to exercise freedom of association and collective bargaining. Over 70% of our staff are members of collective bargaining arrangements so this risk does not apply.	
Child Labour		
HR6 Operations identified as having significant risk for incidents of child labour and measures taken to contribute to the elimination of child labour	Irish Life & Permanent's operations are of such a nature that the issue of child labour within the organisation has not arisen. Our operations are primarily based in Ireland with a small operation in the UK.	NA
Forced and Compulsory Labour		
HR7 Operations identified as having significant risk for incidents of forced or compulsory labour and measures to contribute to the elimination of forced or compulsory labour	As noted above Irish Life & Permanent's operations are of such a nature that the issue of forced and compulsory labour within the organisation has not arisen. Our operations are primarily based in Ireland with a small operation in the UK.	NA
Society Performance Indicators		
Disclosure of Management Approach		
	<ul style="list-style-type: none"> • Policy www.irishlifepermanent.ie/ipm/corporateresp • Goals & Performance • Organisational Responsibility • Training & Awareness • Monitoring & Follow Up • Additional Contextual Information 	Web CR pg 24-28 As above As above As above As above
Community		
SO1 Nature, scope and effectiveness of any programmes and practices that assess and manage the impacts of operations on communities, including entering, operating and exiting	Not specifically reported. We do not have such programmes and practices in place as the nature of our operation is unlikely to have significant impacts on local communities.	NA
Corruption		
SO2 Percentage and total number of business units analysed for risks related to corruption. (Corruption being defined to include bribery, fraud, collusion, conflicts of interest, money laundering)	Given the nature of our activities, the risk of corruption arises through money laundering and fraud as well as conflicts of interest related to the receipt or provision of gifts, entertainment or other payments to clients or suppliers and dealing of shares during closed periods. We have clear policies and procedures governing these items, which are applicable to all business divisions covered by this index. Also adherence to these policies is subject to audit by our Internal Audit function. We also publish a	

IL&P GRI Content Index 2006

Content	Comment	Reference
	Code of Business Conduct on our website. www.irishlifepermanent.ie/ipm/corporateresp	
SO3 Percentage of employees trained in organisation's anti-corruption policies and procedures	100% - all relevant / affected staff are made aware of the company's policy pertaining to gifts and entertainment, to our dealing rules and our fraud policy. Also all staff in the group must undergo mandatory anti-money laundering training annually.	
SO4 Actions taken in response to incidents of corruption	We currently do not report on this indicator.	NR
Public Policy		
SO5 Public policy positions and participation in public policy development and lobbying	Where relevant Irish Life & Permanent plc will take positions and make comments on public policy and its development and implementation – including pension's policy.	
SO6 Total value of financial and in-kind contributions to political parties, politicians and related institutions by country	None – we do not make financial or otherwise contributions to political parties or politicians.	
Anti-Competitive Behaviour		
SO7 Total number of legal actions for anti-competitive behaviour, anti-trust and monopoly practices and their outcomes	There were no legal actions in 2006.	
Compliance		
SO8 Monetary value of significant fines and total number of non-monetary sanctions for non-compliance with laws and regulations	We did not receive any fines in 2006.	
Product Responsibility Performance Indicators		
Disclosure of Management Approach	<ul style="list-style-type: none"> • Policy • Goals & Performance • Organisational Responsibility • Training & Awareness • Monitoring & Follow Up • Additional Contextual Information 	CR pg 6-11 As above As above As above As above As above
Customer Health and Safety		
PR1 Life cycle stages in which health and safety impacts of products and services are assessed for improvement and percentage of significant products and services categories subject to such procedures	Not specifically reported by Irish Life & Permanent because there are no significant health and safety impacts of the products and services we offer, which are intangible in nature.	NA
Product and Service Labelling		
PR3 Type of product and service information required by procedures and percentage of significant products and services subject to such information requirements	All products / services for sale must adhere to both Irish and European financial legislation and regulations including the most recent compliance requirement – the Consumer Protection Code. On a voluntary basis we also subject our marketing material to the 'Plain English' standard.	CR pg 9,11
PR4 Total number of incidents of non-compliance with regulations and voluntary codes concerning product and service information and labelling, by type of outcomes	No material breaches.	

IL&P GRI Content Index 2006

Content	Comment	Reference
PR5 Practices related to customer satisfaction, including results of surveys measuring customer satisfaction	Focusing on customers and excellence in customer service	CR pg 7-9
Marketing Communications		
PR6 Programmes for adherence to laws, standards and voluntary codes related to marketing communications, including advertising, promotion and sponsorship	Focusing on customers and excellence in customer service Complying with regulations	CR pg 11
PR7 Total number of incidents of non-compliance with regulations and voluntary codes concerning marketing communications, including advertising, promotion and sponsorship by type of outcomes	No material breaches.	
Compliance		
PR8 Monetary value of significant fines for non-compliance with laws and regulations concerning the provision and use of products and services	We did not receive any fines in 2006.	