

Annex 4

Procedure ref	Actions	Group CDD	Group CAD	Group CEO	Group GC	Group FD	SBU CEO	SBU FD	SBU GC	Group Financial Controller	Head of Investor Relations	Senior Assistant Company Secretary	Disclosure Committee	Full Board	STEC	PDMRs	Connected persons	Restricted Persons	All Plc employees	All Group employees	Company's legal advisers	Company's brokers
5.3.1	Ensure effective arrangements in place to ensure each adviser maintains its own insider list						•	•	•							•	•		[•]			
5.4.1	Notification to each employee of their restricted person status				•																	
5.4.2	Responsibility to assist PDMRs and their connected persons to comply with their responsibilities, through provision of training materials				•																	
5.5.1 & 7.2.3	Decision as to identity of PDMRs												•	•								
5.5.2	Provision of identity and details of connected persons to Group Secretariat															•						
5.5.2 & 7.2.3	Creation, maintenance and retention of list of connected persons (and PDMRs) for five years				•																	
6.1	Compliance with the Code																		•			
6.2	Provision of Code to comply with Listing Rules requirements				•																	
6.3	Notification to restricted persons in advance of each close period				•																	
6.3	Provision of training sessions to restricted persons and, where applicable, connected persons				•																	
6.4	Maintenance of list of applications for clearance to deal and outcomes - retention period of one year				•																	
7.1.2	Disclosure of interests and dealings to the Company in accordance with the Companies Act 1985													•							[•]	
7.1.3 & 7.2.5	Disclosure of dealings to Company in accordance with Disclosure Rules															•	•					
7.1.4 & 7.2.6	Disclosure of dealings to an RIS				•																	
7.2.2	Ensure PDMRs and connected persons are advised of obligations under Disclosure Rules and provision of appropriate oral/written materials and appropriate contact details for queries				•																	
7.2.3	See 5.5.1 and 5.5.2 above																					
7.2.4	Ensure PDMRs are aware they must identify connected persons to Group Secretariat				•																	
7.2.5	See 7.1.3 above																					
7.2.5	Provision of notification form to PDMRs and connected persons				•																	
7.2.6	See 7.1.4 above																					
7.2.9	Application of 'back up' procedures, wherever possible, to monitor dealing activities of restricted persons and, where applicable, connected persons, with assistance from registrars				•																	
*Denotes an individual's ultimate responsibility for the decision/action - unless, where applicable, the decision is escalated to the Disclosure Committee or the Full Board.																						
**Proposed "Persons Responsible", within Plc, are the Group CAD (or the Head of Investor Relations in his absence), Group GC (or a Senior Assistant Company Secretary in his absence) and the Group FD (or the Group Financial Controller in his absence)																						
[] may not apply																						