ESG Report

Supporting sustainable business practices that positively impact our environment, society, and governance.



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Executive Introduction

“At Equiniti, our ambition is to grow responsibly, sustainably and with purpose — supporting our customers, colleagues, communities and partners while maintaining the strong governance and trust that underpin our business.

Equiniti is operating in a more complex and fast-changing environment, with increasing expectations around operational resilience, data protection, cyber security, responsible use of AI, regulatory change and sustainable business practices. Against this backdrop, responsible business is not a standalone initiative; it is embedded in the way we make decisions, manage risk, serve our customers and invest in the future.

We are focused on building collaborative partnerships, strengthening governance and control, and ensuring that our growth is sustainable, inclusive and resilient. This means continuing to improve our impact across environmental sustainability, social responsibility and corporate governance, while helping Equiniti adapt confidently to the opportunities and challenges ahead.”

Ronnie Bates

Ronald Bates
Chief Risk Officer, Equiniti Group

November 2026

Values & Vision

Equiniti is committed to breaking down barriers both within its organisation and across the wider community. This commitment is driven by our core values: being **Trusted** to deliver on commitments, remaining **Commercial** in building long-term value, fostering a **Collaborative** approach, and striving to **Improve** by continually enhancing skills and services.



TRUSTED

trusted
to deliver on our commitments

COMMERCIAL

commercial
in our focus on building long term value

COLLABORATIVE

collaborative
in our approach

IMPROVE

improve
by continually enhancing our skills and services

Equiniti in Numbers



35%
S&P 500
(transfer agent)

~5,000
Companies
serviced

~£430bn
Payments
made annually



~6000
Employees

53%



of the FTSE100 UK use
our shareholder services



~33m
Shareholders, members
and customers benefit
from our services
globally

Our services benefit over 33 million shareholders, members and customers in the UK, US and 128 countries across the globe.

#1 in the UK
Public Sector
Pension
Administration

#1 in the UK
for Share
Registration

#1 in the US
for IPOs

#2 in the US
Transfer Agent

Sustainable Development Goals

In 2025 we confirmed our commitment to making the UN Global Compact and its principles part of our strategy, culture and day-to-day operations, and to engaging in collaborative projects which advance the broader development goals of the United Nations, particularly the Sustainable Development Goals. As part of the planning process, we have considered the following Sustainable Development Goals to be most relevant to our business.

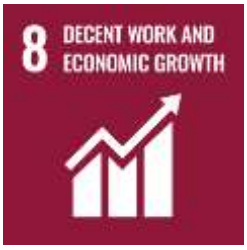




















ESG in Equiniti

We are committed to:

- Always behaving ethically and responsibly
- Being accountable for our impact on society, the economy and the environment
- Being transparent in our decisions and activities which impact society and the environment
- Respecting and considering the interests of our stakeholders
- Maintaining a range of policies covering key legal and ethical issues
- Maintaining an enterprise-wide risk management framework
- Ensuring we have robust audit and assurance processes
- Ensuring colleagues complete annual mandatory online training courses and attestation of key Group policies
- Undertaking a Business Continuity programme to ensure preparedness and timely operational response to critical incidents that may arise
- Providing a clearly defined ESG framework aligned to our business model
- Reaching net-zero greenhouse gas emissions across the value chain by 2040
- Reducing absolute scope 1, 2 and 3 greenhouse gas emissions 49% by 2029 from a 2019 base year

Our aim is to:

- Become the leader in our chosen markets, supporting sustainable economic initiatives
- Offer products and services that foster sustainable growth
- Operate responsibly, always upholding the highest ethical values
- Digitise and innovate, to ensure digital privacy, to enhance the experience of our customers and become more accessible, particularly for vulnerable customers
- Ensure good outcomes and fair treatment for our customers
- Provide a work environment that supports the wellbeing and development of our people
- Minimise our environmental footprint by adopting and promoting environmentally friendly practices
- Provide opportunities for colleagues to assist in our sustainability initiatives via our voluntary colleague-led Eco Network
- Promote and encourage colleagues across Equiniti to work collaboratively with the business to make a positive impact on the planet
- Give back to the communities we operate in



Environmental Targets & Actions
Environmental Performance
Environmental Risk Assessment, Impact & Resilience
Recycling
Climate Awareness and Initiatives

Environmental



Environmental Targets & Actions

We have already made good progress towards our emissions targets and the following actions were undertaken in 2025:

- Property rationalisation resulting in a net decrease of 37,609 square feet across the Group
- Ongoing digitisation of services
- Ongoing LED transformation in our largest group offices
- UK office printer paper sourced from eucalyptus trees

For Notified (cloud-based operations):

- LED lighting in all our offices
- Energy Star equipment (e.g., Printers)
- Revegetation (greening) of parking spaces in our Nagercoil office to improve the atmosphere and naturally cool the external environment
- Paper recycling circuits in place
- Use of green energy from the power grids for our Nuremberg office
- Installation of faucet aerators and double flushers in several offices



SCIENCE BASED TARGETS

DRIVING AMBITIOUS CORPORATE CLIMATE ACTION

EQ Group has approved near and long-term science-based emissions reduction targets with the Science Based Targets initiative (SBTi).

Equiniti Group commits to:

- **By 2040**

  Reach net-zero greenhouse gas emissions across the value chain

- **By 2029 from a 2019 base year**

  Reduce absolute scope 1, 2 and 3 GHG emissions 49%

- **By 2040 from a 2019 base year**

  Reduce absolute scope 1, 2 and 3 GHG emissions 90%

Equiniti is committed to sustainable growth and our plans to reduce emissions include:

- Further consolidation of the number of buildings we occupy and where new properties are added to our portfolio, consider the environmental impact of this
- Working with the owners of the buildings where we do not own the energy contract to encourage switching over to renewable power, where possible
- A comprehensive enhancement of our digital infrastructure embracing sustainable technologies
- Working with internal and external stakeholders with the aim of reducing carbon within our supply chain where possible
- Helping our clients to reduce their carbon footprints through digitisation
- Encouraging and supporting colleagues to work and commute in the lowest carbon-intensive way



Whilst we've already taken positive measures to reduce emissions, further work and planning remains for us to achieve our targets in these key areas:

Energy

Agile Working

Travel

Supply Chain

Environmental Performance

Our GHG CO2e emissions (tCO2e) performance:

	2019 (Target Base year)*	2019 (Recalculated Target Base year - including Notified)**	2020*	2021*	2022**	2023**	2024**	2025**
Scope 1	720	1,369	297	829	1,089	986	874	1,203.41
Scope 2	2,771	5,339	950	734	2,000	2,002	895	949.83
Scope 3	7,752	7,772	1,106	1,284	2,981	3,367	5,433	6,513.23
Total	11,243	14,481	2,353	2,847	6,070	6,355	7,202	8,665.63

* 2020 and 2021 are for legacy Equiniti business (pre-acquisition by Siris in December 2021).

** 2022 to 2025 represent the combined group acquired by Siris in December 2021. The 2025 reporting year includes emissions from Notified.

Equiniti has undergone a period of employee and revenue growth between the Base Year 2019 and 2025. We have increased the number of employees by 46.8% and revenue by 63%.

In comparison to our 2019 base year, by the end of 2025 we have:

- reduced absolute emissions per £1m revenue by 34%, and
- reduced absolute emissions per employee by 43%

	2019 (Base Year)	2024	2025
tCO_2e per £1m revenue	15.13	9.1	9.57
tCO_2e per employee	1.81	1.09	1.12

Keeping base year in step with organisational changes:

In April 2025, Equiniti acquired Notified and the Group boundary was updated accordingly. During the reporting year, we have included Notified emissions from May 2025 onwards.

Notified emissions for 2025 totalled 1,021.42 tCO2e, comprising:

- 411.8 tCO2e from properties (Scope 1, Scope 2, and Scope 3 – water, fuel and energy-related activities); and
- 601.23 tCO2e from Scope 3 (Business Travel and Purchased Goods & Services).

These emissions represent 11% of total Group emissions in 2025 and represent 14% of total Group emissions on a 2024 comparative basis and are therefore considered material. During the current reporting year, we completed a recalculation of our 2019 base year to reflect the inclusion of the Notified entities, in line with our base year recalculation policy. The impact of this base year recalculation is summarised below

- Scope 1: 684.64 tCO2e
- Scope 2: 2567.85 tCO2e
- Scope 3: 20.151 tCO2e (Purchased Goods & Services and Air Travel)

Environmental Risk Assessment, Impact & Resilience

The processes for managing climate-related risks are integrated into our Enterprise-Wide Risk Management (EWRM) Framework.

The following table describes the Group's governance arrangements in relation to assessing and managing climate-related risks and opportunities:

Individual or committee	Oversight and responsibilities for climate-related risks and opportunities.
Chief Executive Officer (CEO)	The CEO is a member of the Group Board and the CRO is a direct report of the CEO. The CEO is accountable to the Group Board for all aspects of climate-related issues.
Board-level committee	The Audit & Risk Committee (ARC) is the Board level Committee with oversight and decision-making responsibilities for the full scope of ESG, including climate change. **The ARC meets quarterly and will:** • Approve key decisions; • Oversee major initiatives; • Review risk assessments and remediation plans; • Review outcomes and effectiveness; • Review financial impact; • Review incidents and investigations and • Approve updates to the ESG Framework
Chief Risk Officer (CRO)	• Has ownership of the ESG Framework, which defines the scope of Environmental, Social & Governance; there is specific reference to managing carbon footprint and climate change resilience • Oversees the Governance framework which determines where responsibility for each element of ESG sits within the committee framework. Decisions and matters relating to carbon reporting, targets and reduction have a documented escalation path up to the Board • Chairs the quarterly ESG Forum, which is an Executive-level Committee • Attends the Audit & Risk Committee which is the Board level committee with responsibility for climate change • Manages the function responsible for carbon accounting and reporting • Manages the Group wide risk management function, which includes understanding and managing the risks and opportunities presented by climate change

Climate-related Risks and Opportunities

As a global business, Equiniti has performed an assessment of climate-related risks and opportunities in respect of the main physical and transition risks we have identified. This has been based on a 1.5°C scenario aligned to the United Nation's Paris Agreement.

Below is an extract from our climate-related risk analysis:

1.5 degrees by 2040 climate change drivers		Wider societal/ economic impacts	Equiniti colleagues	Equiniti customers	Equiniti suppliers	Equiniti global operations affected	Current resiliency measures
Physical Risk:	Sea level rise and rainfall – flooding	Displacement/ movement of people/increase in costs	Relocation/ rehousing of staff (mobility of staff)	Continuity of service, increase FM/ IT resilience planning and costs	Continuity of supply chain	Chennai (Flooding), Mid West US, (Great lakes), East Coast US (sea level), Worthing (Flood Plain)	US (data centre locations), UK (relocation risk), Chennai/ Bengaluru (split of some functions)
Ecological:	Rising temperature – heatwaves	Human illness, decrease localised productivity	Quality of workplace and transportation. Impact on living conditions.	Productivity loss impacting service levels	Increase costs by water/energy suppliers	All sites including home working	Invoke resilience strategy where necessary
	Water availability – drought	Displacement/ movement of people/ supply chain breakdowns/ food and water shortages	Shortages and costs of supply.	No direct impact on customers	Supply chain delays	Indian sites where droughts increasing	Chennai/ Bengaluru reciprocal resilience
	Forestry – wildfires	Displacement/ movement of people/pollution – health/rising carbon emissions/ destruction of ecological and industrials infrastructures/ infectious disease rise	Relocation/ rehousing of staff (mobility of staff) – increase in health/ pandemic threat	Continuity of service	Continuity of supply chain (cloud computing, hardware provision)	Mid-West & East Coat US (smoke from Canadian Wildfires)	US (distribution of workforce)
	Earthquakes, hurricanes, tornadoes, cyclones, blizzards/ storms (Nor'easters)	Displacement/ movement of people/pollution/ destruction of infrastructure/ resilience invocation costs	Relocation/ rehousing of staff (mobility of staff). IT Infrastructure outages	Continuity of service, increase FM/ IT resilience planning and costs	Continuity of supply chain (e.g., cloud computing, internet and telecoms services)	Chennai (Cyclone), Mid West US (Tornadoes/ Storms/ Blizzards), Mid Atlantic US (Hurricanes, Storms, Earthquakes)	US additional data centre, US remote/ distribution of workforce for site loss, US Mid West dual sites. Chennai/ Bengaluru split of some functions

As a global business, Equiniti has performed an assessment of climate-related risks and opportunities in respect of the main physical and transition risks we have identified. This has been based on a higher-warming 3°C scenario.

Below is an extract from our climate-related risk analysis:

3 degrees by 2040 climate change drivers		Wider societal/ economic impacts	Equiniti colleagues	Equiniti customers	Equiniti suppliers	Equiniti global operations affected	Current resiliency measures
Physical:	Sea level rise and rainfall – flooding	Greater displacement / movement of people; higher infrastructure and recovery costs	More frEquinitiuent relocation / rehousing of staff; increased mobility disruption	More frEquinitiuent service disruption; higher FM/ IT resilience planning and costs	Longer supply-chain disruption; higher logistics and continuity costs	South Asia flooding; Midwest US (Great Lakes); East Coast US (sea level); Worthing (flood plain)	US data centre locations; UK relocation risk; Chennai/ Bengaluru split of some functions. Global alert monitoring & escalation
Ecological:	Rising temperature – heatwaves	More frequent human illness; greater and longer localised productivity losses	Reduced workplace and transport quality; greater impact on living conditions	More frequent productivity loss affecting service levels	Higher and more volatile water/energy supply costs	All sites, including homeworking	Invoke resilience strategy where necessary
	Water availability – drought	Greater displacement; more frequent supply-chain breakdowns; worsening food and water shortages	More severe shortages and higher costs of essential supplies	Indirect service impacts from local resource constraints	Longer supply-chain delays and higher sourcing costs	Indian sites where droughts are increasing	Chennai/ Bengaluru reciprocal resilience
	Forestry – wildfires	Greater displacement; prolonged pollution and health impacts; more infrastructure loss and emissions	More frequent staff relocation; increased health and respiratory risks	More frequent or prolonged service disruption	Longer disruption to cloud computing and hardware supply chains	Midwest and East Coast US (smoke from Canadian wildfires)	US distribution of workforce
	Earthquakes, hurricanes, tornadoes, cyclones, blizzards/ storms (Nor'easters)	Greater displacement; more severe pollution and infrastructure damage; higher resilience costs	More frequent staff relocation; longer IT infrastructure outages	More frequent service disruption; higher FM/ IT resilience planning and costs	Longer disruption to cloud, internet and telecoms supply chains	Chennai (cyclone); Midwest US (tornadoes/ storms/ blizzards); Mid-Atlantic US (hurricanes/ storms/ earthquakes)	Gradual transition to the Cloud environment; US remote/ distributed workforce for site loss; US Midwest dual sites; Chennai/ Bengaluru split of some functions

The 3°C scenario impacts have been developed by increasing the scale, frequency and severity of the climate-related impacts identified in the original 1.5°C assessment, while remaining within a plausible and moderate stress-testing range. The key risks remain broadly the same, including flooding, heatwaves, drought, wildfires and severe weather events, but the potential consequences have been adjusted to reflect more frequent disruptions, greater pressure on infrastructure and supply chains, higher operational costs, and increased impacts on colleague wellbeing and service continuity.

It has been concluded that whilst some opportunities exist, such as rationalisation of our office footprint and review of our data centres, none of these have the potential to have a material financial or strategic impact on our business.

We define short, medium, and long term as follows:

	From (years)	To (years)	Comment
Short-term	0	4	We have aligned short term to reflect mitigating actions which we currently have planned
Medium-term	5	10	We have aligned medium term to the SBTi definition of "near-term", that period to which carbon reduction targets apply
Long-term	11	20	We have aligned long term to the period within which we plan to become Net Zero

The inherent risk to operating continuity because of an extreme weather event has been assessed and the physical infrastructure reviewed to ensure resilience of buildings, server rooms, power supply and connectivity. The cost of doing this has been minimal. The review has identified that no material changes were required, and the risk is currently appropriately controlled.



Recycling

At Equiniti, all colleagues have a responsibility to help manage the environmental impact of our operations and support our environmental commitments.

We encourage colleagues to:

- Work to reduce energy and water consumption wherever possible
- Actively seek to reduce our use of paper – 95.21% of colleagues have already opted for paperless pension communications
- Minimise waste and increase recycling, based on the principle of reduce, reuse, recycle
- Work towards eliminating single-use plastic from our operations
- Reduce branded stationery, collateral and merchandise and use digital templates to reduce the requirement for pre-printed stationery
- Consider minimising single-use marketing materials and use lower carbon options
- Reduce paper printouts and manual BCP processes by using digital solutions

We have also implemented the following:

- Zero waste sent to landfill in the UK
- Dedicated food waste bins across UK sites
- Wash basins fitted with non-concussive taps (push button) or PIR sensors, so they run for a limited time
- Water savers installed in the cisterns where possible



Climate Awareness & Initiatives

At Equiniti, the challenges we face in protecting our planet require collaboration from everyone across our business. To help drive Equiniti's sustainability commitment, raise awareness and reduce our impact on the environment, a colleague-led Eco Network has been established.

Several initiatives have already been implemented which are fully supported by our Executive team:

- Creation of a seven principle Eco Pledge which has been signed by more than 4000 colleagues
- An electric vehicle scheme for UK colleagues and installation of EV charging points at main UK offices, for a greener commute
- The sowing of Equiniti's first wildflower garden and participation in "No Mow May" Biodiversity Campaign at flagship Worthing, UK office to encourage pollination
- A special 'thank you for being green' e-card was added to Equiniti's social recognition platform socolleagues can recognise each other for positive environmental behaviours
- Promotion and awareness of environmental topics such as colleague led 'Lunch and Learn' talks on reducing your carbon footprint and reducing plastic



Eco Pledge Principles

I pledge to:

1. Conserve resources by being more **thoughtful about my use of paper, energy and water**
2. **Consider carbon** by learning about Equiniti's carbon footprint and where possible take sustainable measures to reduce it, thinking about the choices we make in operating Equiniti's products and processes
3. **Reduce personal waste** by reducing single use products, reusing and recycling wherever possible
4. Be **mindful of business travel** by considering different ways to collaborate, what is most appropriate for the task I need to complete and making the most of face-to-face time when I do travel
5. Choose **sustainable travel options** such as walking, biking or public transport where practical
6. **Consider the environmental impact** of products and services I buy for the business and whether more sustainable alternatives are available. Ask suppliers to explain their environmental strategy
7. Share ideas to **make Equiniti more sustainable** with the eco network and encourage colleagues to do the same

Colleague EV Scheme and Charging Points

Since launching the scheme, we have saved

268.2 tonnes of CO_2 emissions

which equals

134,115 trees

We are on track to save*

592.15 tonnes of CO_2 emissions

which equals

296,075 trees

1 electric car equates to

770 trees based on carbon emissions

These calculations are based off how many tonnes of carbon would be saved by an EV, equalling how many tonnes of carbon would be absorbed by trees

* By the end of all leases, both delivered and ordered cars, what will be the total CO_2 saved

Environmental Learning and Awareness

At Equiniti, we believe that environmental responsibility begins with knowledge. Understanding the challenges and opportunities of climate change is essential to driving meaningful action. That's why we are embedding environmental learning at the heart of our sustainability strategy.

Building a Culture of Awareness

We are committed to fostering a culture where colleagues at every level are informed and empowered to contribute to our climate goals. To support this, we are continuing to develop and promote learning resources focused on sustainability, climate change and environmental stewardship, carbon literacy, sustainable business practices and climate policy.

Learning that Drives Action

Environmental learning initiatives are aligned with broader ESG objectives, including our commitment to reduce emissions, improve resource efficiency, and promote sustainable practices throughout our value chain. This learning-first approach ensures that sustainability is not just a top-down policy but a shared responsibility across our organisation.

People, Culture and Inclusion
Inclusive Leadership and Education
Preventing Discrimination & Harassment
Wage Equality – Measures & Actions
Employee Health & Safety
Awards & Accreditations
Community

Social



People, Culture and Inclusion

Equiniti has been recognised as a Top Employer in the US, UK and India, reflecting our ongoing commitment to creating a positive colleague experience and a supportive, inclusive workplace. This independent certification reflects the strength of our people practices across areas including employee wellbeing, learning and development, diversity and inclusion, and workforce management.

At Equiniti, open communication and meaningful employee engagement are central to our culture. We provide multiple channels for colleagues to share feedback, ask questions and stay connected with leadership and one another.

- Quarterly engagement surveys enable colleagues to provide regular feedback on their experiences, helping leaders understand employee sentiment, identify opportunities for improvement and track progress over time. Feedback is reviewed across the business and used to inform people initiatives, organisational priorities and colleague experience improvements.
- Quarterly town hall meetings provide colleagues with direct access to senior leaders, offering updates on business performance, strategy and key organisational developments. These sessions include opportunities for employees to ask questions, share feedback and engage in open dialogue with leadership.
- In 2026, Equiniti launched Viva Engage to help colleagues connect, collaborate and share ideas in real time across our global organisation. The platform supports knowledge sharing, recognition, community-building and greater visibility of company news and initiatives.
- Colleagues also receive regular updates from the Chief Executive Officer through a weekly leadership blog, providing insights into business performance, strategic priorities and organisational developments.

Together with other feedback channels, these communication platforms help foster transparency, strengthen engagement and ensure employee voices are heard across the organisation.

Being recognised as a Top Employer in the US, UK and India reflects our commitment to creating a positive, inclusive and supportive workplace for all colleagues.

The Talent Management framework supports meaningful career conversations, succession planning and employee development across the organisation.

Employee Development

During 2026, Equiniti launched a global Talent Management framework supported through Workday. Colleagues are encouraged to build Talent Profiles, document skills, experiences and career aspirations, and create development plans. The framework supports meaningful career conversations, succession planning, workforce capability planning and employee development across the organisation.

By helping colleagues identify growth opportunities and build future skills, Equiniti seeks to strengthen organisational resilience and support long-term career development. By capturing skills, experience, certifications, development interests and career aspirations, Equiniti is building greater visibility of organisational capability to support workforce planning, internal mobility and future talent needs.



Colleague Networks & Inclusivity Charter

Every person, regardless of their ethnicity, race, age, sex, gender reassignment, pregnancy and maternity, sexual orientation, religion or belief, disability or mental health background, should be able to fulfil their potential at work. Equiniti's Policies', Statements and Handbook sets out the steps to achieving this.

We also have the following Colleague-Led Networks:

Multicultural

- Raising awareness and celebrating the different cultures and backgrounds that co-exist within Equiniti
- Driving the inclusion of all ethnic minority groups and celebrating strong role models from all backgrounds
- Encouraging greater participation and understanding

Inclusion

- Championing individual groups who have historically faced discrimination, exclusion or disadvantage
- Providing individual safe spaces for LGBTQIA+ colleagues and advocating for gender inclusion and colleagues living with disabilities
- Raising awareness, battling inequity and continuing to build inclusive environments where everyone can thrive

Wellbeing

- Providing opportunities to improve colleagues' overall physical and mental wellbeing whilst raising awareness and tackling stigma
- Raising awareness on important topics and providing safe spaces for colleagues to share their stories and experiences



500
Network Members



>50+
Mental Health First Aiders

53%



of colleagues have taken up Vitality

10,000
confidential conversations started within our engagement platform in the last year

Wellbeing at Equiniti goes beyond benefits, creating an environment where colleagues can connect, grow and perform at their best.

Wellbeing and mental health support

Colleague-led Wellbeing, Inclusion and Multicultural Networks continue to provide opportunities for learning, awareness building and community engagement across the organisation. The networks help create environments where colleagues can connect, share experiences and contribute ideas.

Equiniti also provides colleagues with access to wellbeing resources through the Vitality Wellbeing App, which offers personalised health insights, activity challenges and wellbeing support to encourage healthy lifestyles and personal wellbeing. Employees are encouraged to take regular breaks, make full use of their holiday entitlement and utilise digital wellbeing tools that promote healthy and sustainable ways of working

A key pillar of Equiniti's wellbeing strategy is supporting positive mental health. Mental Health First Aiders are available across the business to provide initial support and signpost colleagues to appropriate resources when needed. In addition, all colleagues have access to confidential Employee Assistance Programmes that provide counselling and practical support on a wide range of personal and work-related matters. Additional wellbeing resources are available through Equiniti's wellbeing programmes, including tools that support mindfulness, resilience and healthy habits.



Inclusive Leadership and Education

Unconscious Bias

Equiniti continues to invest in learning and development initiatives that support inclusive leadership, respectful workplace behaviours and equitable people practices. Mandatory ED&I learning helps colleagues and leaders build awareness, challenge bias and foster an environment where everyone feels valued, respected and able to contribute. Colleague-led initiatives, including Equiniti India's #EmpowHer programme, provide additional opportunities for networking, learning and development, supporting growth and career progression for underrepresented groups.

Recruitment

Every person, regardless of their ethnicity, race, age, sex, gender reassignment, pregnancy and maternity, sexual orientation, race, religion or belief, disability or mental health background, should be able to achieve their full potential at work. In our changing world, it is essential that we recruit, develop and retain all the talent available to us from the very widest pool. Diversity boosts creativity, morale and productivity, and creates an equitable workplace which is a business priority. At Equiniti we are fully committed to ensuring our people develop their skills and experience.

Equiniti has established a recruitment strategy that prioritises transparency, fairness, and equal access to opportunities. Recruitment processes are designed to attract a broad and diverse range of candidates, with hiring decisions based on skills, experience, qualifications, and role requirements.

This approach supports Equiniti's commitment to fostering an inclusive workplace where all individuals have equal opportunities to apply, participate in the recruitment process, and succeed based on merit. Recruitment practices are regularly reviewed to help ensure fair, consistent, and objective decision-making throughout the hiring process.

Equiniti's commitment to building a diverse talent pipeline is further demonstrated through its recruitment practices and the measures implemented to promote fairness, inclusivity, and reduce the potential for bias throughout the hiring process:

- All hiring managers must complete mandatory unconscious bias training, which forms part of a comprehensive interview preparation programme
- Regular refresher courses help maintain these principles over time. Additionally, our people have unlimited access to LinkedIn learning and all the recruiter and unconscious bias training and learning that is available
- Vacancies are generally advertised to a broad and diverse section of the labour market. Inclusive and unbiased language is used in all job advertisements, and stereotypical wording that may discourage applications from any group is avoided
- The recruitment and selection process is regularly reviewed to ensure all applicants are treated fairly and consistently, while helping us attract a diverse range of candidates that reflects the communities we serve
- Additionally, interview questions for entry-level roles are standardised to ensure a fair and consistent process, while senior roles are increasingly assessed by diverse interview panels

We also offer and promote flexible working, remote and part-time options for a variety of our roles.

Investing in People: Development, Inclusion, and Opportunity

At Equiniti, our people are at the core of our success. We are committed to creating an inclusive, equitable environment where every colleague has access to the tools, training, and support they need to grow, contribute, and thrive. From diversity and inclusion to performance and career progression, we're building a culture of continuous learning and opportunity. We understand that investment in our people is fundamental to delivering long-term value for our clients, shareholders and communities.

Our learning and development strategy is designed to empower colleagues with the skills, knowledge and confidence they need to grow in a dynamic business environment. Through our partnership with LinkedIn Learning, colleagues continue to have access to over 20,000 expert courses, supporting flexible, personalised learning aligned to both current role requirements and future career aspirations. Internal reporting shows continued engagement with the platform, including strong license activation, course completions and use of AI-enabled learning features.

Apprenticeships remain a key part of our approach to building skills, capability and career progression. Through EQ Horizons, we continue to provide access to a broad range of apprenticeship and qualification pathways, mapped to business needs and career development opportunities. During 2025, 42 colleagues joined apprenticeship programs between January and November representing £560,646 of funded development, while 41 colleagues completed programs during the same period. No levy funds expired in 2025, avoiding what would have been a projected loss of £488,812 based on the previous run rate.

To further support career development, we offer formal and informal mentoring programs that connect colleagues across departments and levels. These relationships provide valuable guidance, broaden perspectives, and build confidence, particularly for those in underrepresented groups.

Our approach to people development reflects our belief in lifelong learning and inclusive opportunity. By creating an environment where every individual can develop, contribute and succeed, we are shaping a stronger, more resilient organisation ready to meet the future with confidence.

> “
>
> The apprenticeship has given me an opportunity that I would not otherwise have had as a full-time working mother with 2 children. It has enabled me to work towards a postgraduate qualification whilst continuing my career and balancing my home and work life. Its allowed me to immediately apply my learning in the workplace and build deeper and meaningful connections in areas of the business of wouldn't have normally had the opportunity to do so. The experience has strengthened my leadership capability, expanded my strategic thinking, and given me the confidence to make a greater impact within the organisation. I am really grateful for the opportunity and that Equiniti has provided the platform for me to further my career and personal development”
>
> **Victoria McLean, Senior HR Business Partner**

Preventing Discrimination & Harassment

Equiniti is proud to be a diverse and inclusive workplace where colleagues feel safe and supported. They have the right to be treated with dignity and respect and should treat others in the same way. Bullying, harassment or any other form of poor treatment and behaviour fundamentally works against our values. It is not part of our culture and will not be tolerated. Equiniti is committed to providing a safe and effective process for reporting any behaviour that is believed to be bullying or harassment.

We have a range of measures to prevent discrimination and harassment. These measures include:

- Global policies covering Discrimination, Anti-Bullying and Harassment, Grievance and Sexual Harassment. We also have a Disciplinary Policy to deal with breaches of these policies
- A UK specific policy on prevention of sexual harassment written in line with current legislation, and mandatory colleague training which is continually updated to cover the requirements of this policy
- Annual mandatory colleague training and LinkedIn Learning
- Colleague-led Inclusion and Multicultural networks
- Quarterly Prevention of Sexual Harassment Committee meetings in India

Actions	Locations	Number/% of colleagues completed 2025
Core Responsibilities attestation on Anti-Discrimination/Harassment Policy and workplace harassment	All locations	99.86%
Mandatory training on Equity, Diversity and Inclusion (including Discrimination and Harassment)	All locations	99.82%
Mandatory training on Prevention of Sexual Harassment	India	99.96%
Colleague awareness session on Prevention of Sexual Harassment	India	95.61%
Quarterly Prevention of Sexual Harassment Committee Meeting	India	5 committee members

Wage Equality - Measures & Actions

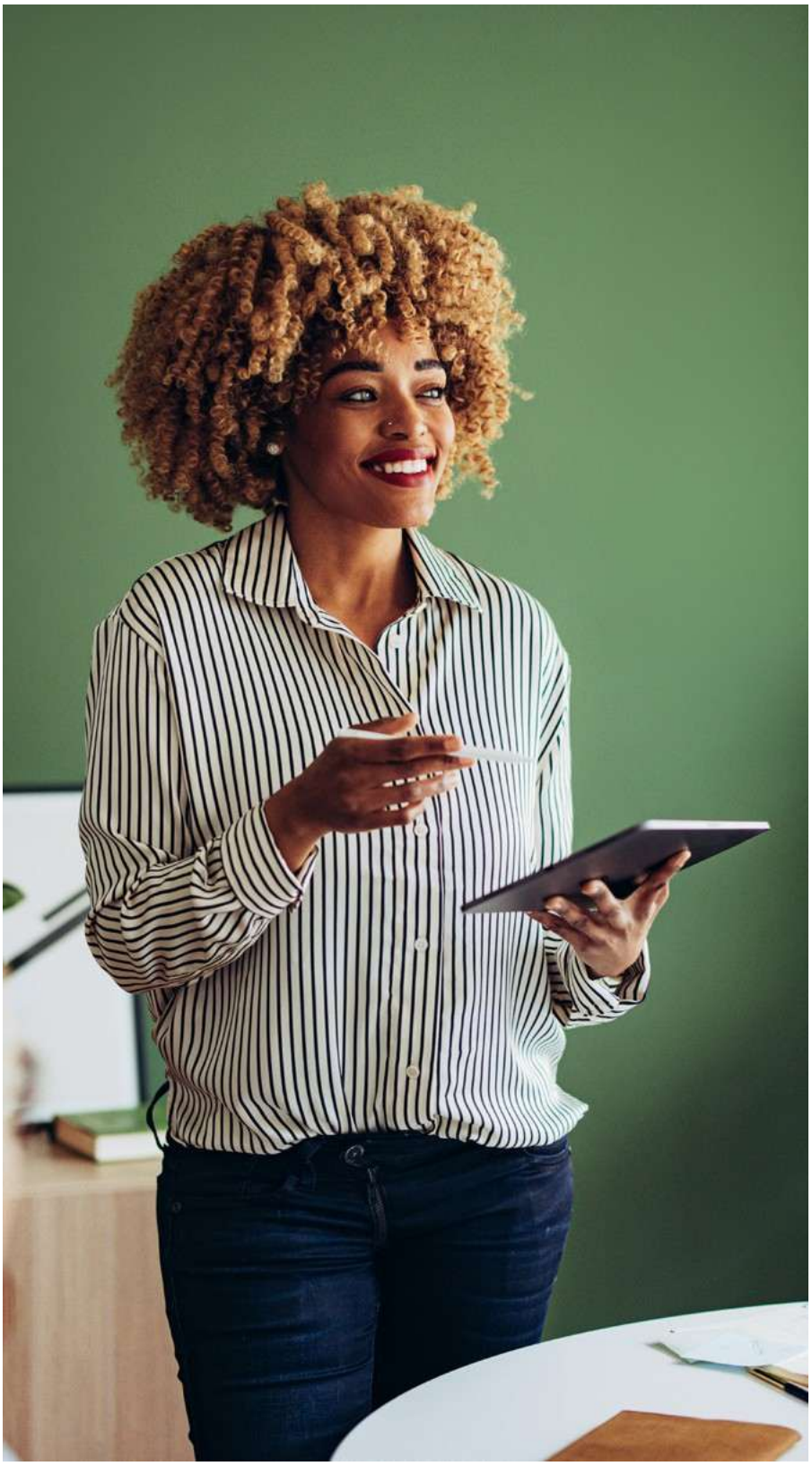
22.65%

Gender Pay Gap has closed by 2.93%

2025 Gender Pay Gap Disclosure

We remain committed to creating an inclusive working environment in which every employee can fulfil their potential and maximize their contribution, supported by our Gender Pay Gap commitments. We firmly believe that the Equiniti Group voluntary pay gap disclosure, comprising of consolidated data for all UK employees working for EQ Group Companies, is the most representative picture of our Group of companies.

We are pleased to report that the mean Gender Pay Gap has closed by 2.93% to 22.65%. This is mainly due to our 2022 to 2024 pay review approach, awarding a higher percentage to those who are lower paid, meaning we are bringing up the pay of females at a faster rate than males.



Employee Health & Safety

Equiniti is committed to ensuring, as far as reasonably practicable, the health, safety, wellbeing and welfare at work of our people and the safety of our clients, visitors, contractors and others affected by our work activities.

We commit to:

- Comply with health and safety legislation applicable to our work activities
- Ensuring our leaders manage health and safety risk
- Establish and maintain effective health and safety management arrangements to prevent, remove or reduce the risk of causing accidents, incidents, near misses, or illnesses from work related activities
- Monitor and report on health and safety performance by carrying out regular audits and workplace inspections
- Ensure all employees are provided with relevant information, instruction, training and supervision to ensure a safe and healthy working environment is maintained
- Suitably investigate accidents, incidents, near misses, dangerous occurrences or ill health to prevent any reoccurrence
- Manage any external contractors to ensure they are suitably competent to carry out work on our behalf



Awards & Accreditations

We're delighted to be certified for the third year running as a 2025 Top Employer in the UK, India and US., showcasing our commitment to a better world of work. The Top Employers Institute measures the 'facts' and benchmarks us against other businesses to see how we compare. Being certified as a Top Employer is a huge seal of approval for potential and existing colleagues, demonstrating excellence in our HR policies and people practices.

- Certified 6th among all Top Employers in the UK
- Certified 4th among all Top Employers in the US
- Certified in the top 25% in India

These are our highest rankings to date, and we've also won several awards and gained several accreditations during the last two years.



in the US

Certified 4th among all Top Employers in the US

#6 in the UK

#4 in the US

Top 25% in India

FT Best Employers 2025 #2 in financial services

FT Best Employers 2025 #26 in UK

CIPD Best People Analytics Initiative

CIPD HR Team of the Year

CIPD Best Health & Wellbeing Initiative

Excellence in CSR & Sustainability

Most Preferred Workplace

Best Organisations or Women (Equiniti India)

#1 Information Agent (DF King)

HR Excellence Best L&D Strategy

CCA Silver Award, 10 yrs of customer excellence

Living Wage Employer

Group 5 #1 in customer satisfaction (US)

CCA Accredited

Community

Beyond its customer base, Equiniti extends its commitment to communities. Through its volunteering programme, colleagues are encouraged to dedicate time to causes that matter to them, contributing thousands of hours to charities, schools, and environmental projects each year. Equiniti also supports ShareGift, enabling UK shareholders to donate unwanted shares to charitable causes, a partnership which has raised millions of pounds over more than a decade. In 2025, our nominated UK charities received over £100,000 through this initiative.

Colleague Volunteer Days

Equiniti encourages its employees to get involved in community engagement through volunteering. Employees are given volunteer days, which they can use to contribute to several good causes, including those that promote financial literacy and inclusion. This grassroots engagement boosts a deeper understanding of the financial challenges faced by under-represented communities, while also providing employees with the opportunity to give back in meaningful ways. Employees contributed almost 8,000 hours to good causes in 2025 using their Equiniti Volunteer Days. Within its India operation, colleagues have given their time and donations to rebuild two community schools, part of their EQ Cares community outreach initiative.

In 2025, Equiniti held its inaugural 'Make a Difference Awards'. Colleagues were nominated for their dedication within their local communities and winners were voted for across the Group. Each winner received an invitation to the annual senior leadership conference and awards, where the overall winner was announced. This demonstrates our commitment to making a difference.

ShareGift Partnership

Equiniti has raised millions of pounds for charities over more than a decade, through its partnership with the UK charity ShareGift. Equiniti gives UK shareholders an option to donate to charity when they get in touch with us to make any changes to their holdings. When they 'tick the box', we direct their unwanted shares and cash entitlements to ShareGift.



Equiniti has donated £128,000 in apprenticeship levy funds to strengthen local services and create learning opportunities.

The Apprenticeship Levy

The Apprenticeship Levy is a tax paid by large UK employers and accessed through the apprenticeship service to fund approved apprenticeship training. Where levy funds are not used within the required timeframe, they expire and cannot be recovered. Employers can transfer up to 50% of their unused levy funds each year to other organisations, helping smaller businesses and charities access apprenticeship training that might otherwise be unaffordable.

As part of our commitment to creating positive social impact, Equiniti has used its levy funding to not only develop our own people, but to support skills development within local communities.

To date, Equiniti has gifted £128,000 of apprenticeship levy funding to charities, community organisations, small businesses and NHS surgeries that would otherwise have limited access to funded training opportunities. Through this initiative, we are helping organisations develop their workforce, strengthen local services and create opportunities for individuals from disadvantaged and underrepresented backgrounds.

Our levy gifting program has already supported a range of organisations, including educational charities, healthcare providers, early years education settings and care providers. These investments have funded apprenticeship programs that help improve teaching capability, healthcare provision and essential community services, while creating sustainable opportunities for learning and career development.

By redirecting unused levy funding into communities, Equiniti is extending the impact of apprenticeship investment beyond our organisation, supporting social mobility, workforce development and long-term community resilience.



Ethical Marketplace



Data Privacy

Equiniti processes personal data for over 33 million shareholders, pensioners and customers across more than 128 countries. Maintaining the trust of our clients and customers in how we handle their personal data is fundamental to our business. We are committed to ensuring that personal data is processed, used and protected responsibly across all our operations, while consistently respecting the rights individuals have over their information.

Equiniti maintains a clear governance framework for the collection, use, sharing, retention and disposal of personal data in accordance with applicable data protection laws and regulations. All data subject rights requests are managed centrally in Trust and Oversight by the Data Protection Operations Team to ensure consistency, compliance and timely responses. Where incidents or errors occur, they are recorded and investigated. Corrective and preventative actions are then implemented to reduce the likelihood of recurrence. The Data Protection Office provides further second line oversight and scrutiny.

At Equiniti, we will always prioritise privacy and will never compromise on the protection of personal information entrusted to us. We treat privacy as a business asset – not a compliance burden – and embed privacy by design across our products, systems, services and business processes. We promote a strong privacy culture across all regions in which we operate, regardless of local legislative requirements, and we will always work to maintain a standardised level of compliance to meet a GDPR standard. Our employees understand the importance of safeguarding personal data and the impact that poor handling of information can have on individuals, clients and Equiniti.

Employees are trained to handle personal information with care, ensuring transparency, security and compliance with applicable privacy laws and regulations. Data Protection training continues to be delivered through an engaging, gamified learning experience based in the fictional world of Datopolis, where employees learn how to identify risks, make appropriate decisions and uphold Equiniti's privacy standards. All employees, contractors and temporary staff are required to complete data protection training within two weeks of joining Equiniti and must regularly refresh their knowledge through ongoing awareness and training activities.

We are committed to transparency throughout the data lifecycle and provide individuals with clear information about how their personal data is collected, used, shared, retained and protected. As part of this commitment, we recently refreshed our Privacy Centre, which brings together all our Privacy Notices in one place. The Privacy Centre also provides additional information on how we safeguard international data transfers to ensure personal data continues to receive an equivalent standard of protection and includes details of the third-party suppliers that support the delivery of our services.

Alongside managing privacy risks, we seek to identify emerging risks, assess their potential impact and implement proportionate controls to mitigate them. We continually review and enhance our controls as technologies, business processes and regulatory requirements evolve. We support the ethical and responsible use of data while enabling innovation and the development of new products and services, ensuring that personal data is used in ways that meet the expectations of our clients, customers and regulators.

As the use of artificial intelligence evolves, Equiniti has established an enterprise-wide AI governance framework overseen by Compliance and the newly formed Enterprise AI function. This framework ensures a consistent approach to assessing, approving and monitoring AI use. All proposed AI solutions undergo risk and impact assessments covering legal, regulatory, privacy, security and ethical considerations. We are committed to deploying AI responsibly, with appropriate human oversight, transparency, accountability and ongoing monitoring.

Equiniti processes personal data for over 33 million shareholders and customers across our services in over 128 countries.

Information Security

Equiniti businesses handle sensitive data on behalf of our clients and customers, including personal data. The security of data and our systems is therefore at the core of our business mission and purpose.

We have developed a mature and effective approach to security that is independently certified and is tested and inspected on behalf of our clients regularly. During the past year various increased demands from demonstrable security has arisen from regulators and clients. We have successfully kept up with those demands.

The Group has appointed a Chief Information Security Officer (CISO) who manages a single Group Information Security team and reports to the Group Chief Risk Officer. The team provides and oversees all aspects of Information and Cyber Security. Certain front-line security activities are conducted by the team (e.g. security monitoring, vulnerability testing), certain others are conducted by Group IT (e.g. patching) and overseen by the Group Information Security team; other activities (e.g. access to business applications) are conducted by business units. The whole Group's Information Security Management System (ISMS) is based on the ISO27001:2022 standard – and the ISMS is certified independently against the standard. During 2026 we successfully renewed our certification for another three years.

The Group identifies, assesses and manages cyber risks continuously. It updates its security strategy accordingly semi-annually. This identifies the most likely and impactful cyber risk scenarios and uses this to adjust the completeness and effectiveness of our cyber security mechanisms. This risk assessment and any controls improvement is reviewed quarterly by the Executive Risk & Compliance Committee and thereafter by the Group Board.

Within our ISMS we enforce a Group Information Security Policy, plus a range of more detailed standards – and further detailed processes and procedures. All staff are instructed in these requirements via formal training and assessment annually (with 99% completion), complemented by periodic additional specific messaging and regular testing (e.g. simulated phishing). Monitoring of staff access and other security relevant behaviours is done across the entire IT estate.

We continuously monitor the security of endpoints, servers, databases and the applications supporting sensitive data assets. Security events and logs are aggregated, normalised and correlated, and used to identify possible security incidents, and any confirmed incidents are responded to in line with standard procedures. The Group has maintained its security and has not experienced any significant security incidents over the past 5 years. The Group handles large volumes of PII data and is financially regulated in the UK and US. As such it is obliged to disclose cyber security and data loss incidents should these occur.

We operate a wide range of complementary security controls covering our secured data centres, Cloud security, PC and server hardening, anti-malware, user and privileged access, remote access, secured network perimeters, data loss prevention, vulnerability scanning and remediation, and secure development and testing of applications.

We conduct regular independent penetration testing of our applications and infrastructure and share the results with our clients. Group entities are also subject to periodic regulatory examinations, and Equiniti clients regularly conduct their own written and/or physical inspections of our security.

Equiniti has used AI-enabled tools as part of our security mechanisms for some years. With the rise of Generative and Agentic AI we are identifying opportunities to make further use of these "frontier" AI models to enhance the effectiveness of our security operations. In 2026 the advent of powerful offensive uses of these models (e.g. Anthropic's Mythos and Fable) has triggered further investigations and we are intending to adjust our approach to vulnerability identification and remediation/patching in line with developing best practice.

Corruption

Equiniti's approach to anti-bribery and corruption (ABC) is embedded within its broader commitment to ethical business practices.

Here are the key elements of our approach:

1. Ethical Business Expectations

Equiniti and all suppliers and partners are expected to:

- Conduct business ethically and responsibly
- Comply with all relevant regulatory requirements
- Adopt ethical business policies that explicitly address:
  - Bribery and corruption
  - Conflicts of interest
  - Market abuse
  - Fraud and improper payments
  - Anti-competitive behaviour
  - Gifts and hospitality policies
- Equiniti does not contribute financial or in-kind to political parties, politicians and related institutions in any of the countries we operate. We only make charitable donations that are legal and ethical under local laws and practices and within our Equiniti corporate governance framework
- We have a dedicated team who have responsibility for any anti bribery and corruption investigations
- Equiniti is subject to annual internal and external audits conducted by external organizations to assess compliance with our financial crime policies

2. Whistleblowing Mechanisms

Equiniti and its suppliers are required to provide mechanisms for stakeholders to anonymously raise concerns, such as through a whistleblowing service. This supports transparency and accountability. Further details on Equiniti's Whistleblowing processes are below.

3. Supplier Due Diligence & Compliance

Equiniti integrates its ABC standards into its supplier relationship management and due diligence processes. Non-compliance can lead to corrective action plans or termination of the relationship.

4. Alignment with Broader Ethical Standards

The ABC policy is part of a wider framework that includes commitments to human rights, environmental sustainability, and fair labour practices. We enforce this policy across all jurisdictions and have a zero-risk policy pertaining to bribery and corruption.

99%

of Equiniti employees completed ABC training in the previous 12 months

Whistleblowing

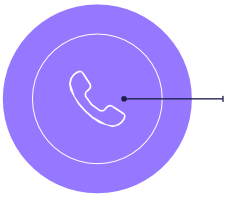
Policy and Process: Equiniti's Whistleblowing arrangements are governed by the Policy, which aims to ensure that customers, colleagues, shareholders and others are treated fairly at all times. Whistleblowing provides the means for colleagues to anonymously raise concerns without necessarily having any evidence, in the knowledge that they will be independently and objectively investigated and addressed.

The Whistleblowing Policy and operational arrangements adhere to the principles of the UK's Public Interest Disclosure Act 1998 and relevant US laws/regulatory requirements or guidance (including Dodd-Frank Act, NY DFS guidance, SEC guidance), which is designed to reassure workers that they can safely raise concerns about serious wrongdoing confidentially with protection from retaliation.

In the first instance, staff should report their concerns to their manager or, where appropriate, a senior manager within the same business line. This can be verbally or in writing. In certain cases, the manager might need to pass details of the concern to someone else for further investigation, so colleagues are encouraged to tell the manager if they want to remain anonymous, which will be protected as far as legally possible.

Colleagues can also raise any concerns through dedicated Whistleblowing channels, which are provided in the Policy and associated 'Handbook'. The channels include a dedicated Whistleblowing email address and phone number. Alternatively, concerns can be raised using Safecall, who provide an independent confidential reporting line where colleagues can be assured that they will be fully addressed. Safecall provides a 24 hour a day, 7 days a week service via a web-portal and Free telephone number in the UK, US, India and other locations in which Equiniti have a staff-base. Any report Safecall generates as a result of a phone call, email or web enquiry will be passed onto the Chief Internal auditor, followed by the Chair of the Audit Committee by the end of the next working day.

Colleagues do not need to give their name, and no attempt will be made to trace them if they raise a Whistleblowing case. Anonymity will be protected as far as legally possible. However, colleagues are encouraged to identify themselves so that they can be kept informed on what is happening and be safeguarded from any possible reprisal. All concerns are treated seriously and will be independently investigated by Group Internal Audit (GIA). The outcomes of the investigation are reviewed by the Chair of the relevant Audit Committee(s). Appropriate action will be taken when necessary.



24/7
service via a Freefone number in the UK & US provided by Safecalll

Whistleblowing cases treat the individual making the complaint as a witness to the wrongdoing, rather than a complainant, and they are afforded the protections outlined below.

- Victimisation of whistle-blowers will not be tolerated, even if the person raising the issue is subsequently found to be mistaken
- Provided staff follow policy and do not raise concerns maliciously, they will not be subject to any detriment by Equiniti
- In addition to Equiniti policy, in the UK the Public Interest Disclosure Act 1998 (PIDA) gives colleagues protection under the law. Similar legal protections against retaliation for raising concerns in good faith exist in the United States and other jurisdictions where Equiniti operates.

The risk of retaliation is specifically assessed by Internal Audit as part of a case. If colleagues have any such concerns in relation to reporting wrongdoing, they are encouraged to tell their manager or the Whistleblowing contacts without delay. If they believe that they have been victimised, they can raise a grievance through the Equiniti Grievance Policy.

Equiniti recognise that in exceptional circumstances, colleagues may feel more comfortable to report an issue completely outside of the organisation. Most countries including US and UK also allow Whistleblowing direct to legally appointed organisations. These should generally be used when no action seems to have been taken after reporting through one of the other channels, or in cases of significant customer harm or Equiniti wrongdoing. Details of these are available in the relevant country sections of the Whistleblowing Policy

Cases: No Cases were raised in 2025 which formally constituted Whistleblowing.

Training: In 2025, 4,370 colleagues were enrolled to complete the Whistleblowing training. Of the enrolled population, 99.61% of colleagues completed the training.

99.61%

of colleagues completed the Whistleblowing training

Whistleblowing Training			
2025	Total	4370	
	Compliant	4353	99.61%
	Non-complaint	17	0.39%

Digitisation

As part of our strategic evolution, we're undergoing a significant digital transformation, ensuring our services remain accessible, efficient, and innovative. This includes developing seamless online platforms and apps for share registration and pension management, whilst keeping shareholders and pensioners secure through enhanced digital verification.

Recognising that not all customers have the same familiarity with technology, we've improved our customer portals to ensure accessibility comes first, incorporating text-to-speech compatibility and optimised navigation for screen readers. We've also integrated QR codes into letters and other communications to encourage customers to explore digital options, leading to a notable increase in portal engagement.

We have rewritten our communications in plain English and trained staff to identify and support vulnerable individuals, providing tailored assistance to those who may struggle with digital tools. Our UK Customer Experience representatives all undergo Dementia Friends training, call centre systems are being upgraded to detect phrases indicating customer confusion or distress so staff can provide immediate support, and all platforms in our Retirement Solutions division have been adapted to record vulnerability.

Equiniti also plays a vital role in easing the administrative burden of bereavement through the Death Notification Service (DNS). We help families navigate a process that can otherwise be overwhelming, allowing them to inform multiple financial institutions simultaneously and help reduce the emotional toll of repeated notifications.

Developed in collaboration with UK Finance and leading banks, the DNS has facilitated nearly 610,000 notifications, improving both customer experience and operational efficiency. By verifying deaths and the identities of notifiers, it streamlines a traditionally fragmented process while maintaining security and accuracy.

However, the challenge extends beyond financial services. Bereaved families still face significant hurdles in dealing with insurers, utilities, and telecom providers, where processes remain inconsistent. We continue to advocate for these sectors to adopt similar efficiencies, ensuring bereavement support is not dependent on the industry in question.

At its core, this work reflects a broader shift towards digital solutions that make essential services more accessible and responsive to real-life challenges. Equiniti is closing gaps in bereavement administration, demonstrating how thoughtful innovation can remove barriers at life's most difficult moments.

A great example of how we help clients drive digital share ownership is EQ Boost.

Equiniti Boost encourages shareholders to 'be more digital' with their shareholdings, by offering a compelling incentive of increased-value dividends. It's a digital option for UK-listed organisations and shareholders.

Equiniti also supports the M&S 'Share Your Voice' campaign.

Aimed at overhauling company law to make it easier for individual shareholders who invest in UK plcs to have a say in the companies they invest in. Equiniti was one of five key signatories calling for modernisation of the Companies Act to enable greater digital access.

Governance & Risk Management

Embedding Sustainability in what we do – Integrating Social & Environmental Impacts into Decision-making

Group Procurement & Supplier Collaboration

ESG Related Assessments, Reporting & Publications

Governance



Governance & Risk Management

At Equiniti, there are five main principles that shape governance:

Accountability

- We are accountable for our actions, and colleagues fully understand the role they play in keeping our corporate commitments
- Environment and ED&I expectations are governed via Equiniti's own supply chain using policies, codes of conduct and due diligence processes and we are committed to delivering our daily work in a way that is environmentally responsible
- Our Client Relationship Oversight teams ensure Equiniti gains visibility of clients and monitors how closely aligned they are to our ESG values

Risk Management

- The standard method through which risks (and opportunities) affecting Equiniti are articulated, assessed, managed, mitigated and reported
- Equiniti's risk management framework is robust and includes three lines of defence, powered by specialist teams

Transparency

- We are transparent in our vision to be the leading global share registrar, offering complementary services to our client base
- We are transparent in our strategy to be experts at providing tech-enabled shareholder, pension and remediation services for our customers around the world
- We are transparent in our values – Trusted, Commercial, Collaborative, and Improve

Fairness

- We ensure the fair treatment of all colleagues and we work within a diverse and inclusive workplace
- We are guided by the international human rights principles encompassed by the Universal Declaration of Human Rights
- Equiniti is committed to acting ethically and with integrity in all its business activities and relationships
- Colleagues are rewarded fairly. Equiniti discloses its gender pay gap data and is taking positive steps to close the gap

Responsibility

- Equiniti is regulated across multiple sectors of our UK and US businesses including the FCA in the UK, and the SEC in the US. We are committed to delivering to regulated standards and aiding our clients to do so
- We see the benefit of working with our peers to advance industry standards and practices
- EQ Customer Resolutions is a member of the collaboration network – a professional membership organisation that supports cross-sector collaboration to improve services for consumers
- Equiniti runs and is a member of the Death Notification Service created to reduce the number of times a bereaved individual must register a death to organisations

Equiniti is committed to understanding the risks facing the Group, managing them in a transparent way and making proactive decisions about where to reduce risk and exploit opportunity. To achieve this, Equiniti has implemented an Enterprise-Wide Risk Management Framework (EWRMF) to enable effective and consistent risk identification, assessment, treatment, monitoring and reporting. The Board oversees and monitors the effectiveness of our EWRMF and we have specialist risk management teams, both centrally and across all locations, that help to embed a risk management culture.

Role	Key Responsibilities
Group Board	Set the culture and tone for effective risk management and policy compliance
Group Audit & Risk Committee (ARC)	• Fulfil the Group Board's obligation to demonstrate their commitment to ensuring effective systems of risk management are established in order to comply with the requirements of the UK Corporate Governance Code • Review and approve changes to this policy • Review risk appetites, tolerances and limits • Recommend to Compliance or Group Internal Audit to review or investigate any risks of interest
Executive Risk & Compliance Committee (ERCC)	• Ensure a robust process exists for the business to identify the risks that are significant to the Group • Hold Executive Risk Owners to account • Escalate any issues preventing risk mitigation • Agree or challenge risks to be accepted • Monitor effectiveness of internal controls implemented to manage risks
Executive Directors	• Drive, monitor and co-ordinate Equiniti's risk management effectiveness • Review policy, risk appetite and limits, and submit to ARC for approval

Equiniti's approach for risk management and controls is based on three lines of defence, ensuring there are clear accountabilities and that all aspects of risk are assessed and managed. The Chief Risk Officer has oversight of the three lines of defence and is responsible for reviewing the appropriateness of this approach on an annual basis.

First Line of Defence - Business Management & Colleagues

Responsible for identifying and assessing the risks faced in the business and ensuring that appropriate controls are established and maintained including:

- Implementing an appropriate and compliant risk management framework
- Implementing and adhering to risk procedures and policies
- Managing the risk profile across the business in accordance with the risk appetite
- Originating/executing business within established risk parameters and policy/limit framework
- Monitoring the effectiveness of key controls and providing challenge to ensure that appropriate controls are in place and operating as intended
- Reporting identified and evaluated / assessed risks
- Escalating risks and issues, as appropriate

Second Line of Defence - Compliance & Risk

Responsible for establishing an effective assurance programme for regulatory compliance and key controls, to support the business:

Purpose of Equiniti Group Compliance Assurance

- To provide an independent assessment of the Equiniti Group's regulated activities, to ensure we are adhering to the applicable regulatory requirements and mitigating the risk of compliance failure that may result in regulatory censure and /or reputational damage or financial loss.

Objectives of Equiniti Group Compliance Assurance

- Undertake a program of compliance assurance reviews that ensure sufficient coverage across regulated products and services provided across Equiniti Group.
- Identify instances of non-compliance with regulatory requirements and work with the business to agree action to mitigate the risk of this non-compliance Assessment of the regulated activities undertaken by the Equiniti Group, against regulatory requirements

Outcomes from Equiniti Group Compliance Assurance

- Supports the provision of assurance to Equiniti Group, alongside first line risk assessment, that regulatory risks are being mitigated.
- Provides collaborative support to the first line business through helping to identify opportunities to improve controls and improve adherence to regulatory requirements.

Third Line of Defence - Internal Audit

The goal of Group Internal Audit (GIA) is to be a trusted advisor to the Board and management.

GIA is an independent and objective assurance and consulting function that is guided by a philosophy of adding value to improve the operations of Equiniti. GIA assists Equiniti in accomplishing its objectives by bringing a systematic and disciplined approach to evaluate and improve the effectiveness of the organisation's governance, risk management and internal controls.

The objectives of GIA are to ensure that:

- Key risks are being appropriately identified, assessed and managed such that corporate objectives, plans and programmes are being achieved
- Policies, standards and procedures are appropriate and are being adhered to
- Financial and operational information is reliable and has integrity
- Applicable laws and regulations are being complied with

Opportunities for improving the efficiency of governance, risk management, and control processes may be identified during engagements. These opportunities are communicated to the appropriate level of management and the associated actions to address them are tracked to closure by GIA.

An Executive ESG Forum was established in 2024 to drive action from the top and create a regular space for discussion and decision making.

This Forum is a subsidiary Committee to the Executive Risk and Compliance Committee (ERCC) and its purpose is to act as the coordinating hub to all formal Group committees with Environmental Social and Governance responsibilities within the Group. The Committee also oversees improvement projects and the production of metrics and materials relating to ESG elements (not already provided by Group committees) to provide a single collated picture of ESG strategy and performance for internal and external stakeholders, and relevant disclosures.

Embedding Sustainability in what we do - Integrating Social & Environmental Impacts into Decision-making

Our ESG agenda has gained momentum with ESG considerations now being integrated into new business case submission processes. This means whenever we start a big project, we think about the environmental, social and governance impact it will have from the outset. This integration is key to our commitment to grow our business in a responsible and sustainable way.

The ESG questionnaire, part of ESG governance, assists in embedding key ESG Framework elements in everything we do.

The questionnaire:

- Assists colleagues involved in business case initiatives by considering the extent to which they have accommodated key elements of ESG
- Provides invaluable feedback in helping to develop and prioritise the ESG-related support required by the business, and consider best practice
- Evidences to clients how we ensure ESG is an integral part of our products and services – delivering a commercial benefit



As a leading shareholder services provider, and advisor to many listed companies, Equiniti provides support in key corporate governance decision-making that involves ESG matters. Various stakeholders, including shareholders, look to corporates to align with their values and priorities in the areas of ESG. Equiniti supports corporate issuers with understanding investor requirements and how these could impact voting at a company's AGM. Equiniti, through their deep market knowledge and experience, helps companies to proactively consider the perspective of the investor. We support companies on communicating their ESG credentials by advising on Annual Report disclosures in the areas of ESG, through the lens of the investor.

Group Procurement & Supplier Collaboration

Equiniti's supplier community represents a highly significant stakeholder group who have a direct impact on Equiniti's ability to meet its carbon target. To ensure colleagues consider ESG within any buying decisions, Equiniti launched a sustainable Procurement Policy and integrated environmental and ED&I expectations into our Supplier Code of Conduct. This supports our aim to encourage partners' carbon goals to align with our own.

Equiniti recognises its role in looking after our planet now and in the future. We are committed to understanding and minimising the environmental and social impact of our operational activities through the selection, manufacture, delivery, usage and disposal of the goods and services we buy.



Environment

- Embed the review and consideration of environmental and social impacts in sourcing and supply chain decisions
- Understand environmental and social risks and impacts of 3rd party goods and services
- Include sustainability and carbon disclosure within tender documents for significant Procurement activities
- Work with employees and suppliers in the development of tools that improve our understanding of environmental and social impacts to improve decision making
- Evaluate whole life costs e.g. carbon, disposal, prior to purchase where appropriate
- Encourage suppliers to develop a proactive approach to sustainability issues, deliver sustainable solutions wherever practical to both improve
- Our collective sustainability performance and to support Equiniti in achieving our net zero target
- Minimise the use of energy and natural resources where appropriate
- Use and dispose of materials in an environmentally responsible way
- Be ethical and inclusive in our business decisions and practices in dealing with our Supply Chain

Human Rights

- Respect human rights, both within our own workforce and our supply chain
- Comply with and work with suppliers who comply with relevant legislation, regulations and directives in the countries and communities in which we operate, including standards on wages and working hours:
  - Offering fair reward and compensation to employees
  - Prohibiting the use of forced labour, human trafficking, and child labour
  - Having policies and procedures in place to protect employees, and prevent any form of harassment
  - Complying with the Modern Slavery Act 2015 where applicable
  - Treating all employees fairly and not discriminate

Improving our performance on sustainability is an ongoing process and our suppliers are an integral part of our journey. We encourage our suppliers to work collaboratively with us through the offering of sustainable products and services, open dialogue, and innovative thinking.

Area	Metrics	Annual Target	As at July 2026	Notes
Sustainability	Percentage of targeted suppliers who have signed the Equiniti code of conduct	70%	81.3%	% of Tier 1,2 & 3 suppliers who have signed the Equiniti code of conduct
	Percentage of Buyers across all locations who have had training on sustainable procurement	80%	82%	% of Procurement Buyers who have completed Sustainable Procurement Training
	Percentage of targeted suppliers that have gone through a sustainability assessment	85%	96.8%	% of Tier 1, 2 & 3 suppliers who have completed the questionnaires and responded

ESG Related Assessments, Reporting & Publications

At Equiniti, governance covers a wide range of issues and obligations. We comply with all legal and regulatory requirements in all jurisdictions that we operate.

This includes the following ESG related assessments, reporting and publications:

- Independent ESG Assessment by Siris
- Carbon Disclosure Project
- Energy Savings Opportunity Scheme (UK)
- Non-financial sustainability information statement (Sections 414CA and 414CB of the Companies Act 2006) and SECR (Streamlined Energy and Carbon Reporting)
- Carbon Reduction Plan
- EcoVadis



ESG Policies

Policy	Summary
Social & Ethical Business Policy	The Social & Ethical Business Policy sets out minimum controls for Human Rights, Modern Slavery, Community Engagement & Ethical Business that all Equiniti business areas attest to no less than annually in the Risk Management system
Equity, Diversity & Inclusion (and multiple People Policies)	The Equity, Diversity & Inclusion (and multiple People Policies) apply appropriate measures to ensure the fair treatment of all colleagues, ensuring adherence to applicable legislative and regulatory requirements, in all jurisdictions we operate within
Environment Policy	The Environment Policy sets out the minimum controls on Environment that business areas attest to no less than annually in the Risk Management system
ESG Handbook	The ESG Handbook is the overarching document that sits behind the Social & Ethical Business and Environment Policies, covering a range of measures to ensure we conduct our business ethically, responsibly and in line with regulatory requirements **The ESG Handbook contains sections on the following areas:** • Equiniti's Corporate Social Responsibility Strategy and principles • Human Rights • Modern Slavery and Human Trafficking • Environmental Impacts and Risks • Community Engagement
Environment Statement **Ethical & Responsible Business Statement** **Human Rights Statement**	These Statements are available on the Equiniti website and set out the principles and explain how Equiniti abides by those principles
Sustainable Procurement Policy Statement	The Sustainable Procurement Policy Statement seeks to embed the consideration of environmental and social impacts in sourcing and supply chain decisions made by Equiniti, and ensure both Equiniti and our suppliers seek to promote and deliver sustainable solutions where practical
Modern Slavery Statement	This Statement is a legally required document which is published on the Equiniti website and sets out the activities which have been undertaken in the last 12 months to mitigate the risk of Modern Slavery within Equiniti
Whistleblowing	The Whistleblowing policy sets out the minimum controls for Whistleblowing that business areas attest to no less than annually in the Risk Management system. This is further supported through a comprehensive section within the Equiniti Compliance Handbook providing colleagues with options which include both internal and external escalations to a third party
Core Responsibilities	All colleagues are required to complete mandatory annual training for Core Responsibilities. This includes key aspects of ESG and ensures that colleagues know what their responsibilities are
Anti-Bribery and Corruption Policy	This policy sets out the minimum controls on Anti-Bribery and Corruption that the business must attest to no less than annually in the Risk Management system
Data Protection Policy	This policy sets out the minimum controls on Data Protection that the business must attest to no less than annually in the Risk Management system
Information Security Policy	This policy sets out the minimum controls on Information Security that the business must attest to no less than annually in the Risk Management system