

Equiniti Group Ethical and Responsible Business Statement

This statement outlines the approach to ethical and responsible business across the whole of the Equiniti Group ("EQ") worldwide. It explains our key principles of ethical and responsible business, and gives information on how we abide by those principles in practice.

Readers should also refer to EQ's Human Rights, Modern Slavery and Environment Statement.

1. Key principles

At EQ our ambition is to ensure that our business grows in a responsible and sustainable way. This means advocating for customers, local communities, suppliers, colleagues and being mindful about the environment in decisions we make. EQ seeks to follow and align to the values and principles of ISO 26000:2010 and therefore, EQ commits to:

- Behaving ethically and responsibly at all times based on the values of honesty, equity and integrity
- Being accountable for our impact on society, the economy and the environment
- Being transparent in our decisions and activities which impact on society and the environment
- Respecting and considering the interests of our stakeholders

According to ISO 26000:2010 "an organisation's commitment to the welfare of society and the environment has become a central criterion in measuring its overall performance and its ability to continue operating effectively. This, in part, is a reflection of the growing recognition that we need to ensure healthy ecosystems, social equity and strong organisational governance." EQ's performance on social responsibility can influence, among other things:

- Competitive advantage
- Reputation
- The ability to attract and retain colleagues and clients
- The maintenance of employee morale, commitment and productivity
- The perception of investors, owners, donors, sponsors and the financial community
- Relationships with stakeholders

2. Delivery

EQ employs a range of measures to ensure we conduct our business ethically, responsibly and in line with regulatory requirements including:

- A range of policies covering key legal and ethical issues
- An enterprise-wide risk management framework
- Robust audit and assurance processes
- Annual mandatory online training courses for all colleagues and attestation of key Group policies via the Core Responsibilities module

- A Business Continuity programme to ensure preparedness and timely operational response to critical resiliency incidents that may arise
- A clearly defined ESG framework aligned to our business model

a) Environment

At EQ, we're committed to carrying out our work in a way that is mindful of our planet and minimises our environmental impact. We believe that having responsibility for the environment is an integral part of doing business in the right way. We consider the following to be the primary environmental categories for EQ:

- Greenhouse Gas (GHG) emissions from our use of buildings
- Business travel
- Employee commuting
- Purchased Goods and Services
- Waste disposal including IT hardware and electrical equipment, printer/toner cartridges, paper and cardboard waste, general and food waste

We measure our scope 1, 2 and 3 carbon emissions in line with Greenhouse Gas Protocol standards and use the appropriate UK Government emission conversion factors for emissions reporting. We have adopted carbon reduction targets in line with the Paris Agreement and have approved near and long-term science-based emissions reduction targets with the SBTi.

b) Social

We want to create a culture at EQ that is open, inclusive and representative of the society in which we all live and work. Our Equity, Diversity & Inclusion Policy and Handbook sets out the steps to achieving this and we have three ED&I colleague-led networks – Multicultural, Inclusion and Wellbeing – and a Global Colleague Forum with representatives from different locations and functions.

Equiniti gifts colleagues two volunteer days a year which they can use to support local causes and communities.

At EQ, colleagues must adhere to our People Policies and undertake mandatory online compliance training annually, covering Equity, Diversity & Inclusion which includes Human Rights and Modern Slavery.

EQ's Supplier Code of Conduct and Sustainable Procurement Policy Statement outline our standards on key social, ethical and environmental issues, including Human rights and Modern slavery. All suppliers should be able to evidence how they maintain these standards.

Our Whistleblowing Policy and EQ People Policy – Grievance (UK, India and US) set out the mechanisms for colleagues to raise concerns and to settle disputes and grievances fairly.

c) Governance

Governance covers a wide range of activities and obligations. The core objective is to ensure effective decision making, in the simplest way possible, given the level of review and legal obligation required. At the heart of EQ's corporate governance strategy are five main principles:

Accountability

We are accountable for our actions and colleagues fully understand the role they play in keeping our corporate commitments

Risk Management

The standard method through which risks (and opportunities) affecting EQ are articulated, assessed, managed / mitigated and reported

Transparency

We are transparent in our values – Trusted, Commercial, Collaborative, and Improve

Fairness

We ensure that we work within a diverse and inclusive workplace and that we treat all colleagues, stakeholders, clients and end customers in a fair and considerate way

Responsibility

We are regulated across multiple sectors of our UK and US businesses and are committed to delivering to regulated standards and aiding our clients to do so

3. Key Policies

We have multiple policies and documents in place to support ESG and responsible business:

- Anti-Bribery and Corruption Policy
- Anti-Money Laundering Policy
- Behaviours and Conduct Policy (Global)
- Conflicts of Interest Policy
- Core Responsibilities
- Customer Treatment Statement
- Data Protection Policy
- Equity, Diversity & Inclusion Policy
- Environment Policy
- Environment Statement
- Health & Safety Policy
- Human Rights Statement
- Information Security Policy
- Modern Slavery Statement
- Social & Ethical Business Policy
- Supplier Code of Conduct
- Sustainable Procurement Policy Statement
- Vulnerable Customer Policy
- Whistleblowing Policy

This statement and commitment to Ethical and Responsible business is owned by the Group ESG Lead and approved annually by the Group ESG Forum and ERCC, acting on behalf of the Group Board.