



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. What does Responsible Business look like at EQ?

At EQ our ambition is to ensure that our business grows in a responsible and sustainable way. For us this means advocating for our customers, our local communities, our suppliers, our colleagues and being mindful about the environment in decisions we make. We embed the principles of responsible business through our focus on collaborative partnerships and strong governance.

EQ seeks to follow the guidance and align to the values and principles outlined in ISO 26000:2010. 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

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

- 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

International standard ISO 26000:2010 sets out what a socially responsible organisation looks like. According to this standard, “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. Ultimately, an organisation’s activities depend on the health of the world’s ecosystems to achieve its strategic vision. In the current global commercial landscape, organisations are subject to greater scrutiny by their stakeholders.”

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. Our approach to ESG

We invest in sustainable growth and are committed to making a positive environmental and social impact on the world around us, whilst demonstrating strong corporate governance. Our ESG activities are designed to support the EQ vision whilst ensuring we strive to deliver on our values - 'Trusted, Commercial, Collaborative and Improve'.

We're going far together...



Furthermore, we are committed to:

- Achieving Net Zero by 2040
- Becoming the leader in our chosen markets, supporting sustainable economic initiatives
- Offering products and services that foster sustainable growth
- Operating responsibly, always upholding the highest ethical values
- Digitising and innovating, to ensure digital privacy, to enhance the experience of our customers and become more accessible, particularly for vulnerable customers
- Ensuring good outcomes and fair treatment for our customers
- Providing a work environment that supports the wellbeing and development of our people
- Minimising our environmental footprint by adopting and promoting environmentally friendly practices
- Providing opportunities for colleagues to assist in our sustainability initiatives via our colleague-led Eco Champions Network, and promoting and encouraging colleagues to sign our Eco-Pledge
- Giving back to the communities we operate in

Environmental

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.

Carbon Emissions

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. This means a commitment to an absolute GHG emissions reduction of 46.2% across Scope 1, 2 & 3 by 2029 from our 2019 base year.

Our Carbon Reduction Plan is published on our website and has been completed in accordance with UK Government PPN 06/21 and associated guidance and reporting standards.

Environmental risk management

We manage climate-related risk using EQ's risk management framework. Clear control objectives are set out in our Global Environment Policy, ensuring all business areas consider the environment and the impacts of climate change to support our environmental commitments:

- Help to raise colleague awareness of environmental issues and encourage environmentally responsible behaviour
- Work to reduce energy and water consumption
- Actively seek to reduce our use of paper and embed the culture of 'digital first'
- Consistently work towards the principles of reduce, reuse, recycle
- Work towards eliminating single-use plastic from our operations
- Integrate environmental considerations into business decisions in line with our environmental sustainability commitment
- Help to protect and maintain our local environment through responsible running of our operations
- Ensure business continuity planning considers impacts to operations from weather events
- Identify and implement pro-active strategies to prepare for extreme weather events to reduce environmental impacts and ensure colleague safety

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. We also have three ED&I colleague-led networks – Multicultural, Inclusion and Wellbeing – and a Global Colleague Forum with representatives from different locations and functions.

Our approach to Human Rights and Modern Slavery

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.

Supplier Code of Conduct and Sustainable Procurement Policy Statement

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.

Whistleblowing and grievance mechanisms

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

Community engagement

'Collaborative in our approach' is one of EQ's core values and we positively support our colleagues, customers and other stakeholders who are all part of our wider social community.

Volunteering and Giving

Each year colleagues receive two days which they can use to support community groups or charity organisations. Colleagues can also support local schools and provide work experience opportunities for students. EQ has also raised millions of pounds by directing unwanted shares and cash entitlements through its partnership with the UK charity ShareGift.

Apprenticeships & Qualifications

EQ Horizons is our apprenticeship and qualifications programme. EQ offers a wide range of programmes designed to support our people in growing their skill sets to become experts in their chosen area of work.

Corporate Social Responsibility (CSR) in India

In India, the Companies Act rule states that companies must spend a minimum of 2% of their net profit on CSR projects. EQ proposes to implement its CSR activities in a few target sectors, including healthcare initiatives, promoting education, environmental activities and promoting the development of traditional art and culture.

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, Risk Management, Transparency, Fairness and Responsibility.

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 EQ's own supply chain by policies, codes of conduct and due diligence processes, and we are committed to delivering our daily work in a way that is environmentally responsible

Risk Management

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

Transparency

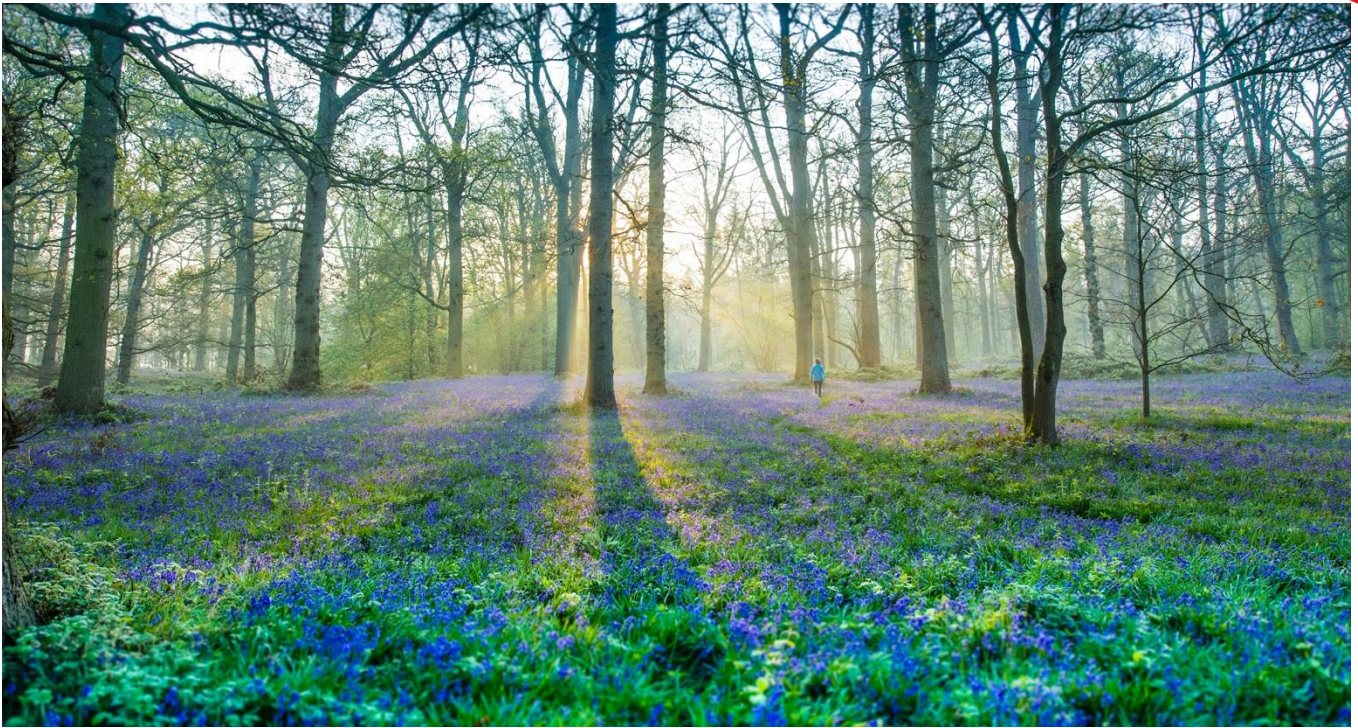
- We are transparent in our vision to be the leading global share registrar, offering complementary services to our client base
- We are transparent in our values – Trusted, Commercial, Collaborative, and Improve

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
- At EQ, we are guided by the international human rights principles encompassed by the Universal Declaration of Human Rights
- EQ is committed to acting ethically and with integrity in all its business activities and relationships
- Colleagues are rewarded fairly. EQ discloses its gender pay gap data and is taking positive steps to close the gap.

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
- EQ Customer Resolutions is a member of the collaboration network - a professional membership organisation that supports cross-sector collaboration to improve services for consumers
- EQ runs and is a member of the Death Notification Service created to reduce the number of times a bereaved individual has to register a death to organisations



3. Key Policies

We have a range of policies and documents in place to support our responsible business and ESG principles. These include but are not limited to:

- Anti-Bribery and Corruption Policy
- Anti- Money Laundering Policy
- Behaviours and Conduct Policy (Global)
- Conflicts of Interest Policy
- Core Responsibilities
- Customer Treatment Statement
- Equity, Diversity & Inclusion Policy
- Environment Policy
- Environment Statement
- Health & Safety Policy
- Human Rights Statement
- 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 Executive Committee, acting on behalf of the Group Board.

