

# 2023 Sustainability Report

July 2024

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# Statement from the CEO

At Envision Pharma Group, our commitment to doing what is right for the environment and public health guides our every action. As we reflect on 2023, we are proud to share the significant progress we have made, focusing on numerous internal initiatives aimed at strengthening our commitment to sustainability and ESG practices.

## Sustainability in action

In 2023, we dedicated ourselves to improving our six key focus areas:

- **Diversity, equity, and inclusion:** 100% of hiring managers received training on diversity, equity, and inclusion
- **Employee health, safety, and well-being:** 100% of employees had access to our employee assistance programs and flexible work arrangements
- **Ethics and compliance:** Maintained our information security accreditation (ISO 27001), our quality management system (ISO 9001), and security and compliance (SOC) 2 standard
- **Responsible supply chain practices:** Developed a Supplier Program
- **Disclosure and transparency:** Achieved EcoVadis Score of **50** and above
- **Environmental impact:** Decreased Scope 1 and 2 emissions by **25%** from a 2019 baseline

We have already begun to reap the benefits of these efforts; we scored **56** on our Ecovadis assessment, a significant increase since our last report. Additionally, we enhanced our health, safety, and well-being offerings across all our global footprints, ensuring robust support for every employee.

We have reduced energy use from our offices by downsizing where offices are no longer needed and by switching to more efficient lighting, achieving a remarkable **42%** reduction in Scope 1 and 2 emissions from 2022 to 2023. And while we are proud of our achievements, we recognize that there is still work to be done on Scope 3 emissions, particularly with our suppliers, and the emissions associated with business travel and working from home.

## Settings our sights on 2024

As we continue our sustainability journey in 2024, we updated our strategy, which has led us to revise our focus areas and their related targets, which include:

- **Engaging our suppliers on Sustainability for Scope 3:** Strengthening our supply chain's sustainability practices
- **Building affinity groups:** Improving awareness and inclusivity within our organization
- **Enhancing our ESG data quality:** Improving the accuracy of our data tracking to monitor and better support our progress

Our commitment to ESG principles is integral to our mission and business strategy. I am immensely proud of our unwavering dedication to sustainability, which promises to create lasting benefits for our employees, society, and the environment for years to come.



Thank you,

Howard Miller  
CEO, Envision Pharma Group

# Company overview

## Our story

Founded in 2001, Envision Pharma Group (“Envision”) is a global, technology-enabled strategic solutions partner for the life sciences industry, serving pharmaceutical, biotechnology, and medical device companies. We are a leading provider of evidence-based communication services and industry-leading technology solutions (iEnvision®) that have applicability across many areas of medical affairs and related functional responsibility.

## Envision’s mission and values



Driven by evidence and enabled by technology, our mission is to make the world a healthier place by bringing new healthcare treatments to market and turn vision into reality.

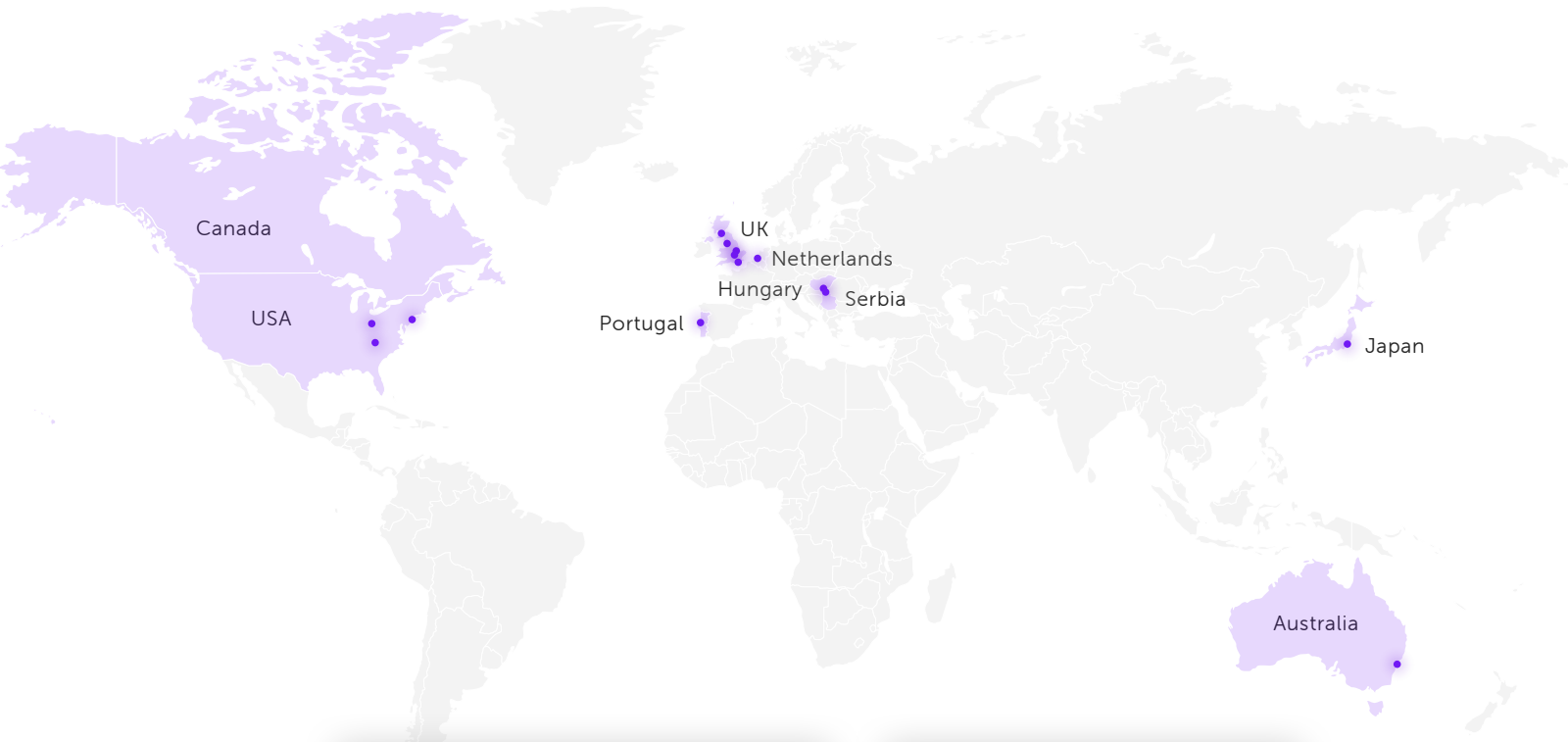
Our values of **Trust & respect**, **People first**, **Accountability**, **Team spirit**, **Continuous innovation & improvement**, **Client centricity** are the fundamental beliefs at the core of our culture. They guide our internal behaviors,

approach, and relationships with our clients, suppliers, and other stakeholders.

## Our presence

Envision is proud to be a global company, serving clients and employees around the world. Our office headquarters are located in Horsham in the UK and we have 14 offices located across the UK, Europe, North America, and Asia-Pacific. As of the end of 2023, we have **1403** team members across nine different countries.

# Delivering smarter, faster outcomes for life sciences



1403

Employees worldwide

14

Offices worldwide



# Company overview

## Solutions

Our solutions are built to accelerate and de-risk results for life sciences teams across the entire product life cycle.

From bespoke strategic consulting solutions to medical strategy to commercialization through launch and beyond, our passion is driving improved outcomes for patients, by providing the best-in-class experts and solutions.

## Technology

At Envision, we enable the life sciences industry through technology and artificial intelligence.

We are proud to empower medical affairs teams through iEnvision – the **#1 medical affairs and compliance software** in the world, artificial intelligence built for life sciences through OKRA.ai, Helix, and more innovative products.



**Helix**  
Government pricing and analytics



**iEnvision**  
Medical affairs workflow platform



**OKRA.ai**  
Artificial intelligence built for life sciences

## Our services

### Envision Medical Communications

Scientific expertise paired with delivery excellence



### Strategic Consulting

Deeply experienced, multi-disciplinary experts



### Life Sciences Commercialization

Accelerate and de-risk your launch and maintain compliance



### Artificial Intelligence

Built specifically for life sciences



### Value & Access

For a value-creation story that maximizes access



# 2023 Sustainability highlights

We are proud to showcase our achievements against our sustainability focus areas:  
Envision's people, diversity, equity, and inclusion, supply chain practices, climate action, and ESG disclosure and governance.

## Envision's people



- Developed Manager's Essentials training sessions to share best practices for supporting colleagues across performance, career progression, and hiring fairly
- Provided all employees with access to a wellness and Employee Assistance Program (EAP) and flexible work arrangements
- **100%** of all our offices in all locations were covered by health and safety reviews
- Launched a new intranet site for our EAP by locality
- Continued to develop our labor and human rights initiatives internally, reviewing policies designed to protect people's rights

## Diversity, equity, and inclusion



- Developed an enterprise diversity, equity, and inclusion (DEI) policy
- Created an internal DEI impact report and set related KPIs
- **100%** of our hiring managers completed training courses on DEI
- Launched our Menopause Employee Resource Group
- Launched our first in-house multilingual training course to promote more inclusive learning for all
- Achieved a **3.9%** median hourly gender pay gap in 2023, a significant improvement compared to our 2022 gender pay gap (**14.5%**)



# 2023 Sustainability highlights

## Supply chain practices



- Partnered with EcoVadis to assess our supply chain in December 2023, as part of our Supplier Program which will be launched in 2024
- Approved our first Supplier Code of Conduct at the end of 2023 to assist our suppliers in understanding and complying with our expectations
- Increased engagement with our landlords to discuss ways to reduce our office's energy and water consumption

## Climate action



- Developed our environmental policy to summarize our sustainability focus areas
- Decreased our Scope 1 and 2 emissions by **53%** from 2019 baseline, exceeding our target of a **25%** reduction
- Achieved our target to conduct a physical and transition climate risks and opportunities assessment for our head office in Horsham
- Our Sydney office increased sourcing of green power from **47.8%** to **100%** in 2023. The building also achieved a **6-star** NABERS Energy rating
- Changed our new starter welcome packs to be made of more sustainable materials to reduce waste

## ESG disclosure and governance



- Published our first annual sustainability report
- Maintained our information security accreditation (ISO 27001), our quality management system accreditation (ISO 9001), and our security and compliance (SOC) 2 standard
- Became a UN Global Compact participant, committing us to meet fundamental responsibilities in human rights, labor, environment, and anti-corruption
- Achieved a CDP climate action **B** rating
- Improved our EcoVadis score by 20 points to a score of **56**, and awarded a Bronze Medal
- Attained a CyberVadis score of **884**, 138 more points than our 2022 score



# 2023 ESG performance

In this section, we present an overview of our progress against our 2022 sustainability targets, highlighting which of the targets have been achieved and those that are in progress. For targets achieved by 2023, we have established new objectives and commitments.

2023 target		2023 status	Performance comment
Diversity, equity, and inclusion	Achieve <b>50/50</b> male/female representation in senior leadership positions by 2028	✓ ACHIEVED	In 2023, 56% of our employees in senior leadership positions identified as female
	Develop and publish an enterprise diversity, equity, and inclusion policy with an established governance committee by 2023	✓ ACHIEVED	
	<b>100%</b> of hiring managers receive training on diversity, equity, and inclusion by 2023	✓ ACHIEVED	
	<b>100%</b> of offices covered by health and safety reviews by 2023	✓ ACHIEVED	
Envision's people <sup>1</sup>	<b>100%</b> employees to complete display screen equipment assessments by 2023	✓ ACHIEVED	
	<b>100%</b> of employees have access to wellness and Employee Assistance Programs and flexible work arrangements by 2025	✓ ACHIEVED	
Climate action <sup>2</sup>	<b>25%</b> decrease of Scope 1 and 2 emissions by 2030 from 2019 baseline	✓ ACHIEVED	Our Scope 1 and 2 emissions decreased by <b>53%</b> from our 2019 baseline
	<b>10%</b> decrease of Scope 3 emissions by 2030 from a 2022 baseline	🕒 IN PROGRESS	Our Scope 3 emissions have increased since 2022 due to data availability and quality improvements
	Develop a science-based target by 2023	🕒 IN PROGRESS	We have developed targets for validation with the Science Based Targets initiative (SBTi)
	Procure <b>100%</b> renewable electricity by 2030	🕒 IN PROGRESS	In 2023, we procured <b>5%</b> of renewable energy, we are investigating ways to increase procurement of renewable electricity, eg, by securing purchase power agreements
	Conduct climate risk and opportunities assessment by 2023	✓ ACHIEVED	
Supply chain practices	Develop a Supplier Code of Conduct by 2023 to implement by 2024	✓ ACHIEVED	
	Publish supplier diversity/responsible sourcing program information on our website by 2024	🕒 IN PROGRESS	We developed a Supplier Code of Conduct in 2023. In 2024, we will launch our Supplier Program
	Develop a strategy to increase spending with small and local suppliers by 2024	🕒 IN PROGRESS	In 2023, Envision developed a process to identify diverse and small suppliers for tracking spending
ESG disclosure and governance <sup>3</sup>	Maintain information security accreditation (ISO 27001), quality management system (ISO 9001), and SOC 2 standard	✓ ACHIEVED	
	Align to an environmental ISO by 2025	🕒 IN PROGRESS	We are looking to align to ISO when developing an environmental/energy management system
	Establish an ESG committee by 2023	🕒 IN PROGRESS	Our ESG Steering Committee was formed in 2023 and will undergo a restructure in 2024
	Align sustainability report to the Global Reporting Initiative (GRI) by 2024	✓ ACHIEVED	
	Develop a website section disclosing ESG strategy and progress by 2023	✓ ACHIEVED	We have launched a sustainability section on our website with a link to our 2022 sustainability report
	Achieve CDP Score B for the climate action questionnaire by 2027	✓ ACHIEVED	We disclosed to the CDP climate action questionnaire in 2023 and achieved a CDP Score <b>B</b> in 2023
	Achieve an EcoVadis score of <b>50 and above</b> by 2025	✓ ACHIEVED	We achieved an EcoVadis Bronze Medal (Score <b>56</b> ) in 2023

Notes:  
<sup>1</sup> Envision's people: Focus area previously named "Employee Health, Safety and Wellbeing"  
<sup>2</sup> Climate action: Focus area previously named "GHG Emissions / Environmental Impact"  
<sup>3</sup> ESG disclosure and governance: Merged focus area previously named "Ethics and Compliance and Disclosure & Transparency"  
We are no longer targeting to "Plan, prepare and implement ISO 27701 (Privacy) by 2024"

# Sustainability at Envision

## Double materiality assessment

With the help of Savills Sustainability Consultancy, we updated our sustainability strategy, completing a double materiality assessment for the first time. Our double materiality assessment was largely based on the guidance developed by the European Financial Reporting Advisory Group (EFRAG) for the use of companies that are subject to the Corporate Sustainability Reporting Directive (CSRD). Our company is not yet required to comply with CSRD, but we have decided to voluntarily follow their guidance to proactively adopt best practices when updating our strategy.

A double materiality is an assessment that evaluates how a company’s actions may affect the environment and people, as well as evaluating potential sustainability risks and opportunities that could impact our company’s finances.

The process we used to complete our double materiality assessment followed a three-staged approach. First, to better understand the sustainability context surrounding Envision, we defined our stakeholder engagement strategy. Our stakeholder engagement strategy set the time horizon, the type of assessment completed by each of the stakeholder groups, and the engagement method, which included online research, surveys, and workshops. The stakeholder groups included were clients, suppliers, investors, environmental and society regulators, as well as our employees, our executive leadership team, and our ESG team. To understand the sustainability context surrounding Envision, we completed a regulatory landscape and peer review.

Second, we identified potential material topics, covering the European Sustainability Reporting Standards (ESRS) list of potential material matters, topics included in the GRI, as well as investors’ requests and our previous years’ materiality assessment. Third, we defined our list of material topics based on the results of our impact and financial materiality assessments, which includes all matters deemed material from an impact perspective on people or the environment, from a financial perspective, or from both.

The topics material to Envision have been summarized in six focus areas, which shape our sustainability strategy and our sustainability report.



As we continue to develop our sustainability strategy, we will refine and update our materiality methodology and focus areas to ensure we prioritize the issues that could impact our business and stakeholders in the short and long term.

# Sustainability at Envision

## Impact and financial materiality assessment results

Our double materiality assessment reviewed a list of potential material sustainability matters, developed based on the ESRS requirements, developed to comply with CSRD, and aligned with the GRI guidance.

The graph on the right summarizes the impact and financial assessment results. The darker grey areas indicate topics that were considered material from either an impact, financial, or both perspectives. Our impact and financial materiality assessments were completed following our stakeholder engagement strategy, which is outlined below.

After completing our 2023 double materiality assessment process, we can observe similar areas of focus compared to our 2022 materiality assessment. The 2022 strategy was based on six sustainability themes, some of which remain unchanged in 2023, but some were modified to include new areas identified as material for the company. The two material themes that remain the same are diversity, equity, and inclusion and supply chain practices.

Envision’s people and climate action revised focus areas now include previous focus areas: Employee health, safety, and well-being and Greenhouse Gas (GHG) emissions/environmental impact. ESG disclosure and governance is our new focus area that merges disclosure and transparency and ethics and compliance. Finally, we have added a new area, community engagement, which reflects ongoing efforts toward supporting communities around us.

## Stakeholder engagement strategy

Our stakeholder engagement strategy was determined by identifying key stakeholders that are or could be affected, from an ESG perspective, by our company’s operations or our value chain. We determined which engagement methods and time horizons were relevant for each stakeholder group. All stakeholder groups took part in the impact materiality assessment review and the financial materiality assessment was completed by a selected group of Envision’s team that were able to assess each of the potential material topics from the impact perspective on Envision’s revenues, profit, and assets. For the impact assessment, the engagement method varied per group; we completed desk research for our clients, suppliers, and regulators.





# Sustainability at Envision

## Sustainability strategy

Our sustainability strategy is guided by our double materiality assessment, which we used to identify our focus sustainability areas. We will strive to incorporate these themes into Envision’s decision-making, taking into consideration our stakeholders’ interests and business priorities.

To track our progress in these areas, we have set several measurable targets. Our sustainability strategy supports 10 of the United Nations Sustainable Development Goals (SDGs). Through the implementation of our sustainability strategy, we are committed to making a positive impact on each of these goals.

Our sustainability policy articulates the strategic themes and provides a high-level overview of the related objectives and actions needed to enable accountability. Furthermore, to ensure that the policy remains relevant, it also outlines the governance process and provides an ESG risk management overview. Our executive leadership team has the overall responsibility for overseeing the implementation of our sustainability policy. Members of our ESG team will ensure actions are implemented to achieve the targets related to the policy.

## Centralizing the process

At Envision, we are committed to improving our performance on sustainability and achieving meaningful, impactful targets. This includes supporting our clients to achieve their sustainability commitments. To manage client and investor requests in this area, we have set up a sustainability mailbox and appointed a central point of contact for all inquiries relating to sustainability across ESG matters.

Client correspondence can be sent to: [SustainabilityRequests@envisionpharma.com](mailto:SustainabilityRequests@envisionpharma.com) and supplier correspondence can be sent to [sustainability.partners@envisionpharma.com](mailto:sustainability.partners@envisionpharma.com). These mailboxes will be monitored daily (on UK working days) by Envision’s ESG team.




Envision’s people






Diversity, equity, and inclusion







Community engagement






Supply chain practices





ESG disclosure and governance





Climate action



Learn more about each goal by visiting: [sdgs.un.org/goals#icons](https://sdgs.un.org/goals#icons)





# Sustainability at Envision

As a result of revising our strategy, we have updated our targets as summarized below. Further details on the progress achieved on our previous targets are included in page 8. For changes made to previous targets and more details on our current targets can be found in the appendix.

## Sustainability 2024 targets

### Diversity, equity, and inclusion



- Achieve gender balance across senior teams by 2028
- Achieve **10%** mean gender pay gap by 2030
- Develop processes, tools, and committees to improve DEI by 2025
- Develop processes and tools to support employees with neurodiversity by 2025

### Supply chain practices



- **100%** suppliers compliant with Suppliers Code of Conduct by 2028
- Identify preferred suppliers based on ESG criteria by 2025
- Implement enterprise-level third party management platform for supplier assessment by 2024
- Implement low or no-plastic options across our suppliers’ products by the end of 2025

### ESG disclosure and governance



- Formalize ESG committee and disclose individual responsibilities by 2024
- Align to an environmental ISO by 2025
- Achieve an EcoVadis score of **65 or above** by 2027
- Achieve CDP Score **A** for the climate action questionnaire by 2030

### Community engagement



- Establish an annual volunteering day supporting local communities by 2024
- Continue to support our local communities by partnering with local charities
- Develop a community engagement plan by 2025

### Envision’s people



- Expand our Employee Assistance Program to include more services by 2025
- **100%** of employees to receive ESG training by 2025
- Living wage policy and employee rights policy to be implemented by 2025

### Climate action



- Reduce Scope 1 and 2 emissions **55%** by 2030 from a 2022 base year
- Set Scope 3 targets and validate with the SBTi by 2025
- Reduce business travel emissions by **10%** by 2028
- Integrate climate-related risks into our risk management approach by 2025
- Achieve a recycling rate of **50%** by 2028

# Envision's people

Our people are the central pillar underpinning our success and the key driver propelling our business development. They are our most valuable capital. Their continued efforts and dedication enable us to grow and deliver our vision.

Envision had a workforce of 1403 permanent and temporary employees at the end of the reporting period, of which 1285 were full-time and 115 were part-time. In 2023, 282 new employees were hired. With employees spanning different age groups, our multigenerational workforce enables us to tap our employees' best talent and skills at every level.

As of the end of 2023, we achieved **56%** female representation in senior leadership roles and **62%** female representation across all organizational levels. We are proud to have achieved the milestone of 50/50 male/female representation in senior leadership positions 5 years before our 2028 target through hiring and talent development efforts.

Within our executive leadership team, we have **30%** female representation, while our board has **22%** female representation. We are working hard to increase this over time by enhancing our recruitment and promotion processes to include a focus on diversity and representation, to achieve and maintain gender balance across all teams.

In the US, we increased our team's ethnic diversity to **24%** in 2023, which is comparable to industry targets. At the executive leadership level, we have **20%** minority ethnic representation, while at the board level, we have **33%** representation.

## 2024 Plans to improve diversity, equity, and inclusion



The gender profile of promotions tracks with our gender profile for the organization.

- Our 2024 evaluation process will introduce more specific rating definitions to minimize subjectivity
- During the Quarterly Business Review meetings, each leader reviews one to three strong team members to nominate for stretch and other roles

## 2024 Recruitment plans



We attract a diverse pool of candidates and select the right candidates through a fair and balanced process.

- Future practices will include proactive outreach to diverse populations via diversity job boards

### All team members



62%



38%

### Senior leadership roles



56%



44%

### Executive leadership roles



30%



70%

### Board roles



22%



78%

### Average tenure



4 years



4 years

# Envision's people

## Employee training and development

We are dedicated to providing our employees with training and education opportunities that support their professional development. We want our team members to expand their knowledge and enhance their skills. When we excel as individuals, we succeed as a team. We nurture a culture to encourage professional development and recognize and reward each other's achievements.

In 2023, we started training Envision's 100th Associate Medical Writer as part of the Evolve Scientific program for entry-level writers. We have provided this training course to team members in the UK (49), Portugal (2), North America (38), and JAPAC (15). We also offer employees access to the Energize program, which includes eLearning modules and weekly online meetings. These include role-specific knowledge-sharing, presentation skills, and time management. In 2023, we also piloted the Evolve Client Service training course, which we plan to roll out more widely in 2024.

Over the course of 2023, we proactively prioritized the health and well-being of our employees. This included streamlining our display screen equipment learning module, making the information more concise and readily accessible, as well as offering multilingual options.

An array of additional training has been rolled out to enhance our employees' professional competence, such as leadership, early talent, and soft skills training courses. On-demand access to a broad range of eLearning resources is available via our learning management system. Furthermore, we offer personal and professional development planning and coaching to team members identified via quarterly talent reviews.



In 2023, we continued our global partnership with the Healthcare Businesswomen's Association. This partnership offers networking and professional development opportunities to our employees, while also providing the opportunity to take part in its ambassador program.

## Occupational health and safety

- Envision is committed to providing a safe, inclusive, and supportive environment for all employees, whether working on-site at a company location or remotely. We recognize the unique challenges and responsibilities associated with remote work and the necessary measures to create a safe and inclusive work environment. We place our employees' health, safety, and well-being at the center of our business model
- We also operate a global health and safety program that takes into consideration the health and safety regulations of all the countries in which we operate. We conduct annual health and safety audits to ensure we are fully compliant with all relevant laws and regulations
- All employees are made aware of our health and safety policies and training, our EAP, and the #InThisTogether campaign during onboarding. Our supplier pre-qualification process includes health and safety criteria to determine suitability

// Envision is committed to providing a safe, inclusive, and supportive environment for all employees, whether working on-site at a company location or remotely.

# Envision's people

## Working conditions

We provide substantial benefits for health, finances, and well-being, and our [#InThisTogether](#) well-being program provides nominated mental health champions, programs, and training. In 2023, we had 25 #InThisTogether champions leading these initiatives in all our markets globally. Furthermore, in 2022, we surveyed all employees to understand if the rewards and compensation we offer align with their needs and wishes. This review has informed our next steps and will inform future policies.

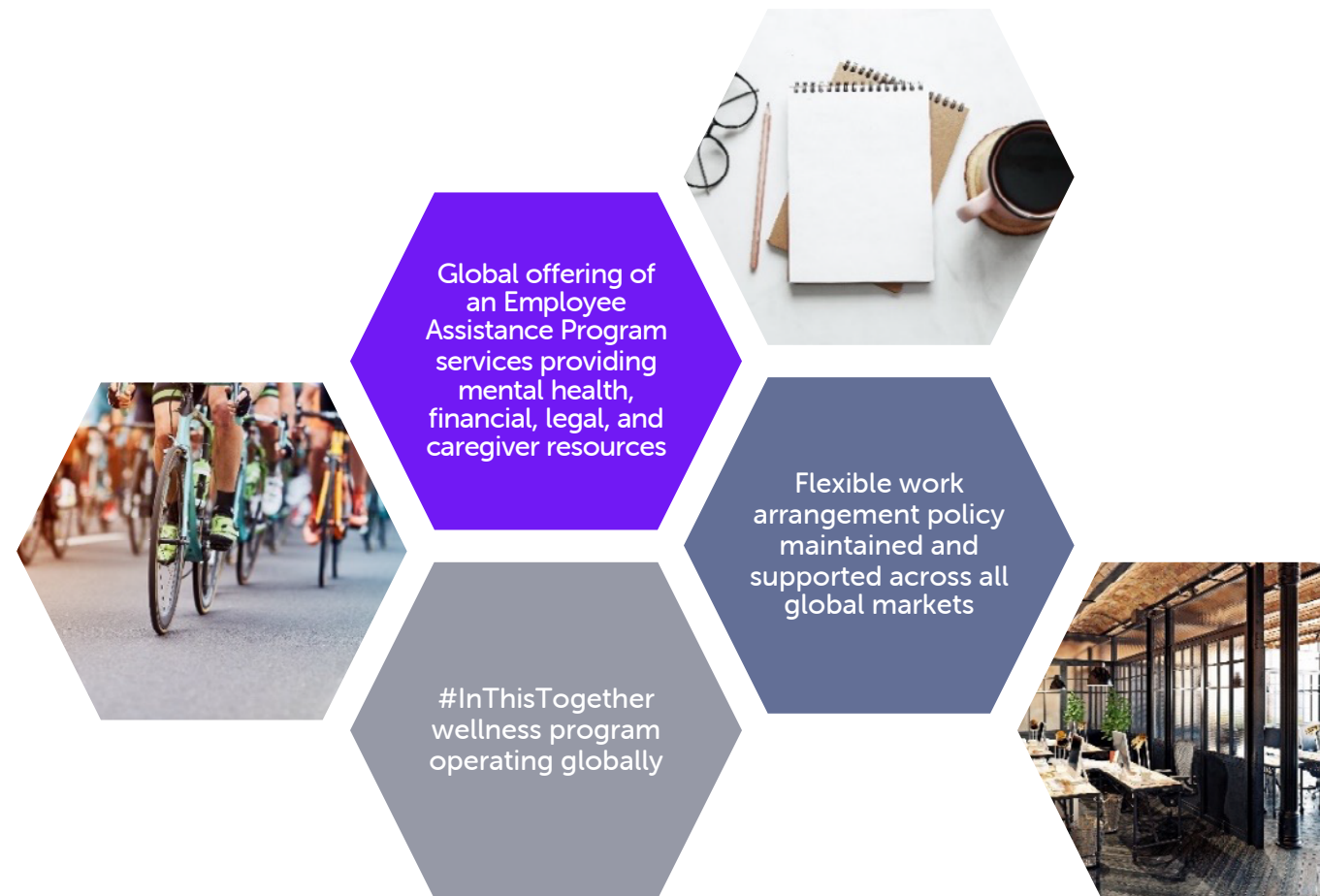
We have always supported flexible working through remote working and part-time working. Our Flexible Working Framework, launched in 2019, continues to allow team members to adapt their working arrangements to support themselves.

Our speak-up policy, also known as our whistleblower policy, gives our employees a confidential way to raise concerns and promotes a culture of integrity and ethical decision-making.

## Corporate culture

Envision embeds its sustainability strategy within our corporate culture and strategic plans, making sustainability part of our operations. During onboarding, new employees are introduced to our sustainability approach where we share our priorities and recent achievements. We are developing our ESG Steering Committee to help lead the direction and implementation of our sustainability strategy globally, supporting Envision's ongoing commitment to sustainability.

We also aim to establish a diversity, equity, and inclusion steering committee by the end of 2024, to accelerate our journey in this area. Furthermore, our efforts toward corporate culture have led to our organization being listed as one of the 2024 top companies for growing your career for mid-sized employers in the UK.



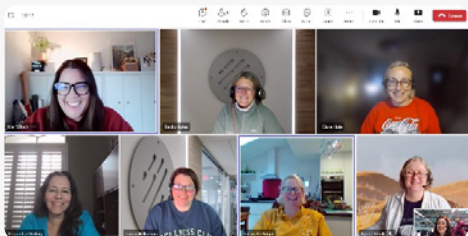
# Envision's people

## Corporate culture

Our **#InThisTogether** program brings together champions who promote well-being-related events and awareness dates to the whole organization across all geographies. These champions also have a focus on specific identity groups.

World Menopause Day was one of the awareness days promoted by our **#InThisTogether** Champions in 2023. The purpose of the day was to raise awareness of menopause and the support options available for employees to improve their health and well-being.

As part of the program, we continued to work toward understanding how Envision can play a role and ensure that we are providing the right support for anyone who is impacted by menopause, whether personally or through the experiences of loved ones. Articles and guidance relating to menopause were made available to all employees, and a menopause support eLearning module was launched to help managers and colleagues understand more about menopause, how they can help, and how to make adjustments in the workplace.



Our Menopause Employee Group met for the first time in 2023.



Our champions also promoted events supporting Movember, an annual event to raise awareness of men's health issues across all geographies. A MOGA (men's yoga) session was made available to all employees (of all genders) to attend from the office or home. In the UK, a bake sale was held to raise funds for Stop Hate UK.

We provide all our employees access to an EAP, offering employees and their families a range of services and information on a range of topics, such as health, well-being, financial matters and work. The service is completely confidential and is available 24/7.

Furthermore, our offices have social committees that employees can volunteer to join, helping organize social events to bring everyone together. In offices where the building rules allow it, employees can also bring their dogs to the office, helping improve the well-being of their owners and colleagues.

## Awareness events held in 2023

Black History Month (US)	World Cancer and Cancer Research Days	Time to Talk Day
Winter and wellness sessions	International Women's and Men's Days	Neurodiversity Celebration Week
World Sleep Day	Stress Awareness Month	Mental Health Awareness Week (UK)
Pride Month	Carers Week	Men's Health Week
International Self Care and Mental Health Days	World Alzheimer Month	World Suicide Prevention Day
International Week of Happiness at Work	National Fitness Day (UK)	World Heart and Day

# Diversity, equity, and inclusion

We have recently redefined our DEI commitments and aspirations to accelerate Envision's DEI trajectory and secure and retain top talent to support our company's growth. We have shared our enterprise DEI policy with our team, and we have completed a DEI assessment of our performance in conjunction with our third-party consultants. We have also recently welcomed a new Chief People Officer to the company, to help formalize our approach to employee engagement on affinity groups and Employee Assistance Program (EAP).

At Envision, we are committed to fostering, cultivating, and preserving a culture of DEI. We believe that a diverse and inclusive environment contributes to the success and innovation of our company. We embrace and encourage our employees' differences in race, ancestry, color, religion, gender (including pregnancy), gender identity or expression, sexual orientation, familial status, national origin, nationality, age, disability, citizenship, veteran status, civil union or domestic partnership status, political affiliation, socio-economic status, and other characteristics that make our employees unique.

We recognize that diversity in background and experience drives diversity of thought, helping us to make better decisions and challenge the status quo. Therefore, it is within our best interests to promote diversity, and we furthermore operate a zero-tolerance policy toward discrimination (verbal, non-verbal, or physical abuse) in the workplace.

As part of our new DEI policy, we are putting a plan in place to support employees in setting up and running employee resource groups, creating momentum across the organization. We have solicited nominations for a global DEI steering committee. We are also reviewing our training program to ensure we are promoting DEI in all steps of our employees' journeys. Furthermore, we are looking to engage with speakers on topics that our people have shown interest in, as well as intensifying our demographic data collection to help us understand how we compare to the general population, to help inform future decisions.

We have recently focused on the importance of using pronouns within our teams: We have introduced this topic to our executive leadership team, enhanced our HR system to enable employees to provide their pronouns, and enabled pronoun functionality within our remote meeting system so employees can opt to list their pronouns in their online profiles.

In 2024, our objectives include further highlighting the importance and encouraging the utilization of pronouns throughout the organization. We are actively providing updates on forthcoming DEI activities through departmental meetings and our all-company newsletter. Once our DEI steering committee is launched, we plan to leverage the committee's knowledge to prioritize which new employee resource groups should be launched.

We also plan to increase our focus on neurodiversity awareness and support in 2024. We are going to define our HR process to support employees with neurodiversity, as well as develop processes and tools to support employees with neurodiversity and develop a training course for managers on how to better manage and support team members with neurodiversity.

// **We believe that a diverse and inclusive environment contributes to the success and innovation of our company.**



# Diversity, equity, and inclusion

## Equal treatment and opportunities for all

As part of our review of DEI commitments and aspirations, we have identified three key steps to demonstrate our commitment:

- **Education:** offering training and information to employees during onboarding, annually, and through community-building initiatives. We are initially focusing on removing bias and adding a DEI focus to the employee onboarding process. Our hiring managers have received DEI training, and all people managers in 2024 will complete a series of workshops which will include discussions on identity and removing bias from hiring. We have recently scheduled a panel on the importance of allyship to provide additional guidance to our people on how to be good allies
- **Insights:** to better understand our population, support increased diversity efforts, and plan for increased inclusivity, we will solicit demographic information from our people. This will help us leverage diversity data to inform action
- **Operations:** assessing processes related to recruitment, retention, and management or internal and external policies and practices, with a focus on equity

We are aiming to establish more identity groups, such as the Menopause Employee Group, which was launched in 2022, and expand participation globally. We are also working to enhance our #InThisTogether well-being program of monthly events. Furthermore, to support physical accessibility, wheelchair access and lifts are being installed in new offices.

## Pay equity

At Envision, we promote equitable practices to create an inclusive work environment that enables the growth and development of all employees regardless of differences. We value the diversity of our workforce by supporting employee resource groups, observing cultural practices that demonstrate respect and dignity for the customs and heritage within our local markets, and enacting all employee training to reinforce our commitment to DEI.

We are committed to pay equity as part of our inclusive work environment that respects and values the contributions of every employee. As part of this commitment, we strive to be externally competitive while ensuring internal equity across our organization through core benchmarking practices and market assessments of targeted roles to achieve pay equity across all global markets.

In the UK, we achieved a **3.9%** median hourly gender pay gap in 2023, a significant improvement on the previous year's **14.5%** pay gap. When comparing mean hourly pay, the pay gap in 2023 was **12.6%**, a decrease from the previous year's **16.3%**. Women occupy **66.7%** of the highest-paid jobs and **61.2%** of the lowest-paid jobs across Envision in the UK.

Our success was due to work we started in the last couple of years to review our compensation philosophy, benchmark roles, and assess the competitive landscape of our most critical roles. In 2023, we continued the marked evaluation of all salaries that we started in 2022, which followed a Total Rewards Survey, which we carried out to understand the needs/wishes of the organization with regard to reward and compensation.

// At Envision, we promote equitable practices to create an inclusive work environment that enables the growth and development of all employees regardless of differences.



# Community engagement

Our [#InThisTogether](#) Champions promote a selection of awareness events and fundraising opportunities across our offices throughout the year. Our festive events included Christmas Jumper Week in the UK and Serbia. This activity supported the organization Save The Children by inviting employees to wear Christmas jumpers in return for a charity donation.

In Portugal, we supported the Cerebral Palsy Association of Coimbra during their Christmas fundraising by buying mini baskets with cookies, jam, and aromatics which have been created by their members. The Cerebral Palsy Association welcomes and reintegrates people with disabilities into society, providing them with care, training, and employment.



We also ran a global Reverse Advent Calendar, where employees donated an item each day in December (or as often as they could) to be given to someone in need at the end of the month. As a highlight, in the UK, we supported the Horsham District Foodbank as one of these events.



// On behalf of all of us at Horsham Matters thank you so much for the donation of food today. It has been a challenging year for so many and demand for our foodbanks has risen while donations have fallen so we are incredibly grateful to you for the support. (...) Please pass on our thanks to the rest of the employees at Envision Pharma Group and have a great Christmas.

# Community engagement

## HOPE Foundation

Formed by the founders of Envision and supported by an employee-run steering committee, the Envision HOPE Foundation's mission is to improve the lives of underserved people by supporting health education and medical care from the local to global level. The foundation supports activities that expand access to healthcare via the provision of grants, supporting needs such as nutrition and mental health, equality to science and medicine, medical research, and educational opportunities.

In the past year, the Envision HOPE Foundation made donations to numerous charitable entities. This included continued support for the Student Voice Prize championed by Beacon for Rare Diseases, which seeks to expose medical students to the experience of patients affected by this rare disease. HOPE aims to donate in excess of **\$200,000** in grants during the next 12 months.

Employees can submit requests to support local, regional, or international charities through the iEnvision portal, which is also used to track and keep a record of all foundation donations. During 2023, we made donations toward a selection of charities that support LGBTQ+ communities in the UK and the US.



## Organizations Envision supported in 2023

- The Trevor Project, a leading suicide prevention and crisis intervention organization for LGBTQ+ young people in the US
- The Pride Center of New Jersey, an organization that provides a safe and welcoming space for all individuals who identify as LGBTQ+
- Triangle Community Center, which provides programming driven by health, community, and support for LGBTQ+ people in Connecticut, including clinical services
- Allsorts Youth Project, an organization that listens to, connects, and supports children and young LGBTQ+ people in the UK
- The Naz and Matt Foundation, a charity that provides a comprehensive range of trauma-informed support services to LGBTQ+ individuals or their parents, from religious or culturally conservative backgrounds, in the UK
- Stort Pride, a social group and safe space project for LGBTQ+ people in Bishop's Stortford





# Supply chain practices

Responsible supply chain management is a fundamental aspect of our business operations. We want to partner with external suppliers who are committed to operating their business responsibly and ethically, respecting their employee's rights and safeguarding the environment. We have implemented new processes to assess suppliers' environmental and social sustainability performance and will continue to develop procedures to ensure high standards of environmental and social conduct throughout our supply chain.

## Supplier Code of Conduct

We developed a Supplier Code of Conduct in 2023 to communicate our values and expectations to our suppliers. Our Supplier Code of Conduct covers our expectations in relation to anti-corruption, human rights, freedom of association, compulsory labor and human trafficking, prohibition of child labor, health and safety of employees, non-discrimination, and environmental protection. The Supplier Code of Conduct will be shared with all suppliers who we are working with, and we will be reaching out to our largest suppliers to understand their current ESG progress and explore how we can collaborate to support their sustainability initiatives. We will review our Supplier Code of Conduct to ensure it continues to align with our expectations and company values.

## Our Supplier Program

In 2024, we will launch our Supplier Program, which aims to ensure that our suppliers align with us on our sustainability vision and goals. The Supplier Program is structured around four pillars: labor, human rights, ethics, and sustainable procurement. This mirrors the structure of EcoVadis, which is a globally recognized assessment platform that rates businesses' sustainability. We will require all suppliers to complete a self-assessment, to attest to the Supplier Code of Conduct, confirm if their business is diverse, and assess their sustainability maturity to get a baseline for engagement activities. Depending on a supplier's size and maturity, we will ask our suppliers to participate in sustainability disclosure platforms such as CDP and EcoVadis. We may also require our suppliers to set science-based targets.

## Supplier diversity and inclusion

As part of our Supplier Program, we plan to launch a supplier diversity program. We see supplier diversity as integrating businesses owned by individuals from diverse backgrounds, such as ethnic minorities, women, veterans, LGBTQ+ individuals, and people with disabilities, into a company's supply chain and overall business operations. Our client base is diverse, and we believe that we can service them better by ensuring we are diverse as a company along with our supplier base.

### Supplier EcoVadis assessments



In 2023, we used the EcoVadis sustainability rating tool to assess our supply chain and our supplier's risk level. We plan to continue partnering with EcoVadis to understand our supplier's governance and risk management.

### Our targets



- **100%** suppliers compliant with Suppliers Code of Conduct by 2028
- Identify preferred suppliers based on ESG criteria by 2025
- Implement enterprise-level third party management platform for supplier assessment by 2024
- Implement low or no-plastic options across our suppliers' products by the end of 2025

# Climate action

## Climate action mitigation and adaptation

While completing our sustainability strategy update, we reviewed our focus areas, which led us to update the GHG Emissions section to climate action. This serves as an umbrella to cover our initiatives to mitigate and adapt to climate change, as well as measure the environmental impact of our operations. Climate action includes our approach to implementing energy efficiency measures, procuring renewable electricity, and how we plan to mitigate and reduce our impact from business travel and integrate climate-related risks into our operations.

We recognize that in order to mitigate our impact on the environment, we need to first measure it, that is why we began assessing our GHG emissions in 2019. Our first GHG emissions reports focused on the areas where we had direct responsibility and impact. Understanding that our impact goes beyond what we can directly influence, since 2022, our GHG assessment has expanded to include indirect emissions resulting from our operations. A full breakdown of our emissions and the data underpinning our calculations is included on **pages 23–25**.

We understand that as important as it is to measure our environmental impact, we also need to mitigate it and adapt. That is why we have implemented a number of initiatives to reduce our emissions, which are summarized on pages **23–24**. Furthermore, in 2023, we conducted our first ESG risks and opportunities assessment and a biodiversity audit. A summary of both assessments is included in this section on pages **26–27**.

In addition to meeting our GHG Emissions targets set in 2022, we implemented our environmental policy and commenced a project to review our offices' ESG credentials. We are working with our current and potential landlords to share our ESG expectations and request their help in sharing more data. We also plan to implement green clauses in our future leases.

As we continue our journey, we have updated our targets to reflect our progress and our ambition to do more for the environment. Envision also formalized a new role of SVP, ESG Strategy and Sustainable Operations at the beginning of the year to reflect our new approach and support the work needed to deliver our ambitions.

### Our targets



- Reduce Scope 1 and 2 emissions **55%** by 2030 from a 2022 base year
- Set Scope 3 targets and validate with the SBTi by 2025
- Reduce business travel emissions by **10%** by 2028
- Integrate climate-related risks into our risk management approach by 2025
- Achieve a recycling rate of **50%** by 2028



# Climate action

## Greenhouse gas emissions

As part of Envision’s 2023 sustainability objectives, we embarked on a collective journey, partnering with our third-party consultants, to undertake a comprehensive greenhouse gas (GHG) emissions assessment of our operations. This assessment was prepared in accordance with the GHG Protocol Corporate Accounting and Reporting Standard (Revised Edition), the GHG Protocol Scope 2 Guidance, and the Corporate Value Chain (Scope 3) Accounting and Reporting Standard.

Our latest assessment was prepared for the period from January to December 2023 and covered all operations, 21 offices across 9 countries, with the most significant operations being based in the US and followed by the UK. For Scope 1 and 2 GHG emissions, we used 2019 as a baseline, while for Scope 3, 2022 was used as a baseline.

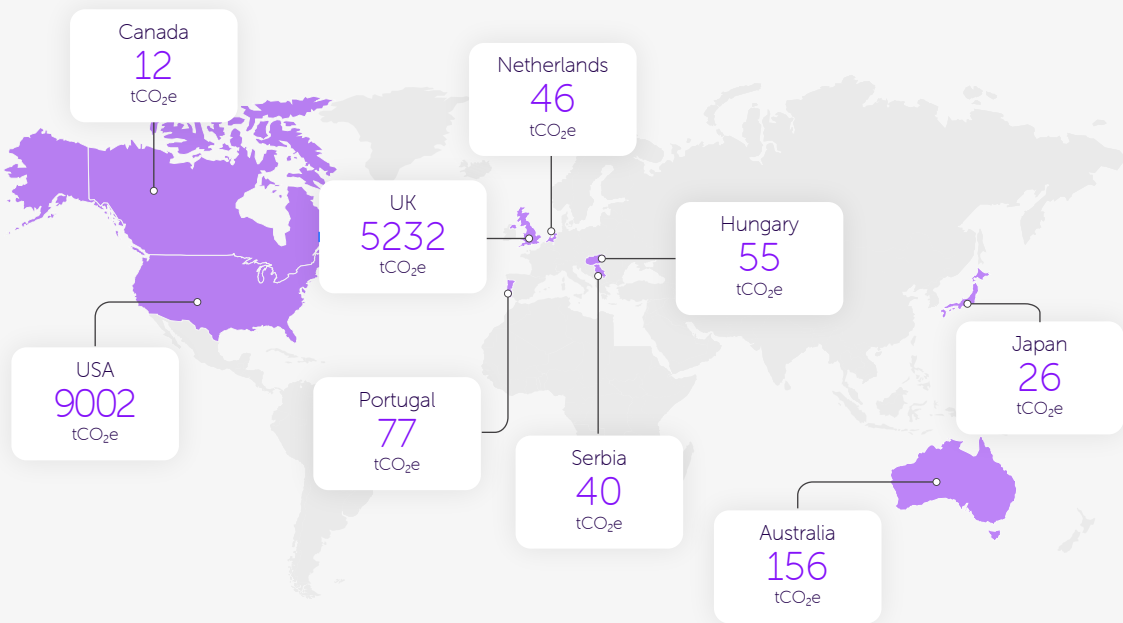
### Targets and performance

In 2023, we developed our science-based targets, which we plan to submit for validation by 2025. We exceeded our **25%** decrease of Scope 1 and 2 emissions by 2030 from the 2019 baseline target by achieving a **53%** reduction compared to our 2019 baseline. The accomplishment was a result of a combination of decarbonization actions taken and portfolio changes, as summarized below:

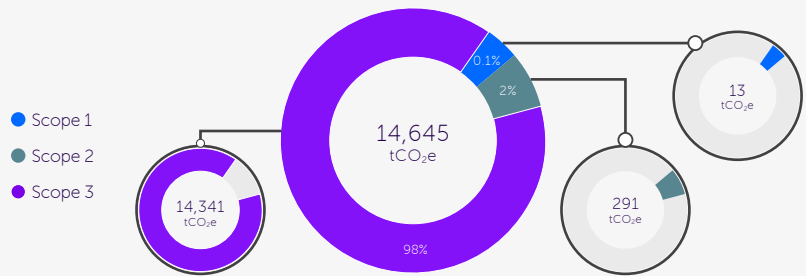
- Replaced old lights with LEDs across our UK offices (Wilmslow, Bishop’s Stortford, and Battersea)
- Continued downsizing our offices to reflect the increase in hybrid and working-from-home arrangements, closing our offices in Alderley Park, Bishop’s Stortford, Glastonbury, Pasadena, Philadelphia, and Watford
- The Sydney office increased sourcing of green power from **47.8%** to **100%** in 2023

Our Scope 3 increased compared to 2022, reflecting the effort to get better data to calculate GHG emissions from our operations and understand their environmental impact. Based on Envision’s latest Scope 3 emissions, we are likely to restate the target linked to it as we also work toward having our science-based targets approved.

## Global impact – GHG emissions\*



\*Total Scope 1, 2, and 3 GHG emissions



# Climate action

## Greenhouse gas emissions

In 2023, Envision included all categories that were relevant to our operations, with a total impact of 14,645 tCO<sub>2</sub>e (market-based factors). GHG emissions associated with our direct energy use, Scope 1 and 2, accounted for 304 tCO<sub>2</sub>e (market-based), representing **2%** of Envision’s total emissions in 2023. Scope 2 emissions were calculated using both location-based and market-based factors. The latter is higher due to Envision’s office’s limited usage of renewable energy.

Reported Scope 3 emissions include purchased goods and services, capital goods, fuel, and energy-related emissions that are not captured in Scope 1 and 2, upstream transportation and distribution related to purchased goods and services, waste generated in operations, business travel, employee commuting, and upstream leased assets and processing of sold products.

Purchased goods and services and business travel emissions accounted for **70%** and **13%** of our total emissions, respectively. These categories are responsible for most of our emissions, reason why we plan to set targets to reduce these emissions. As a company, we are working toward decreasing business travel so that we can meet our target to reduce emissions linked to this category by **10%** by 2028.

In 2023, we completed waste audits to identify improvement opportunities, which should help us make progress toward our target of achieving a recycling rate of **50%** by 2028.

Envision Pharma Group GHG emissions (tCO<sub>2</sub>e)

Scope	Category	2019	2020	2021	2022	2023
S1	Natural gas	32	47	47	54	13
	Company cars	8	2	2	-	-
S2	Scope 2 (location-based)	533	413	356	408	256
	Scope 2 (market-based)	608	455	387	471	291
Scope 1 and 2 (market-based)		648	504	436	525	304
S3.1	Purchased goods and services	2	2	1	3766	10,320
S3.2	Capital goods	Not reported			208	329
S3.3	Energy-related activities not captured in S1 or S2	Not reported			177	64
S3.5	Waste generated in operations	29	16	12	8	21
S3.6	Business travel	1658	409	83	576	1836
S3.7	Employee commuting and working from home	Not reported			971	1428
S3.8	Upstream leased assets	Not reported			293	289
S3.10	Processing of sold products	Not reported			55	54
Scope 3		1689	426	96	5994	14,341
Total (market-based)		2337	930	532	6519	14,645
GHG intensity (kgCO2e/ft²)		2019	2020	2021	2022	2023
Scope 1		2.07	2.54	2.54	2.92	1.10
Scope 2 (location-based)		4.25	3.37	2.96	3.24	2.19
Scope 3		Not reported			42.18	108.11

# Climate action

## Energy consumption

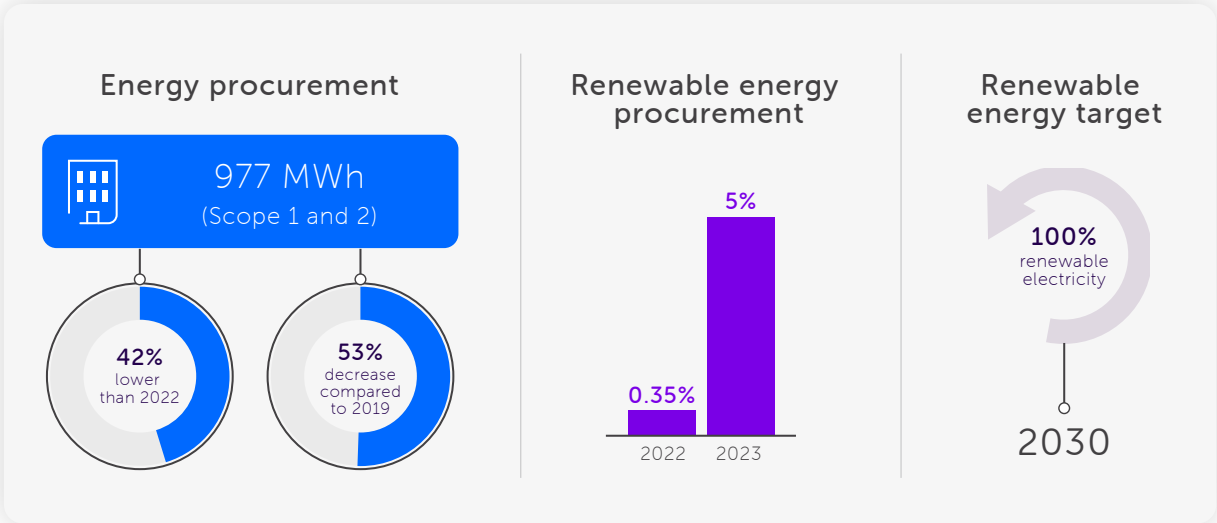
We procured 977 MWh of electricity and gas for use across the offices where we have operational control (Scope 1 and 2), which is **42%** lower than in 2022 and a **53%** decrease compared to the 2019 baseline. Scope 2 renewable electricity accounted for **5%** compared to **0.35%** in 2022, which reflects the initial actions taken toward meeting Envision’s target to source **100%** renewable electricity by 2030.

When including offices leased and not under operational control (Scope 3.8: Upstream Leased Assets), we procured an estimated total of **1800 MWh** of electricity and gas. The total procured energy in Scope 3.8 is **34%** lower than in 2022, the first year with data available for indirect emissions. The reduction in gas and electricity consumption is linked to our efforts to downsize and close offices, as well as the replacement of old lights with LEDs across the offices we have in the UK.

We plan to continue working on decreasing our energy consumption by implementing energy efficiency initiatives and by working with our landlords to increase actual data to reduce estimations.

Furthermore, the electricity usage associated with the two data centers we use that are not under our operational control are reported as part of Scope 3.10: Processing of Sold Products of Scope 3 and account for 0.16 MWh. In 2023, we started a project to transition, where we can, to cloud-based from on-premises site servers, which deliver savings through efficiencies in collaborating with large clients specifically focused in this area and reduce the risk of on-site specific climate events.

To concentrate our efforts, in 2023 Envision established the role of Sustainability Manager with a global scope. This position was created to address the requirements for sustainability data, strategy, and disclosure necessary to align with our sustainability objectives.





# Climate action

## Climate risks and opportunities assessment

As part of our process to manage ESG risks, we completed a climate risks and opportunities assessment aligned with the recommendations of the Task Force on Climate-Related Financial Disclosures. We assessed transition risks related to the global shift to a low-carbon economy and physical risks resulting from climate change.

## Climate-related physical risks and impacts

To identify physical climate-related risks and opportunities, we conducted a physical climate risk assessment for our head office in London and a high-level regional review of physical climate risks in regions where our offices are located. The physical climate risk assessment was conducted using Munich Re climate action datasets. The assessment was carried out using three different climate pathways (RCP 2.6, 4.5, and 8.5) and four time periods (current, 2030, 2050, and 2100).

The high-level regional review revealed that physical risks from a changing climate in regions where we operate are already present and growing. Although physical climate risks are unevenly distributed and different across regions and over time, all locations are projected to experience further temperature rises and an increased frequency of heatwaves, and changes in precipitation, increasing the risk of droughts and flooding. It was found that most locations are projected to see an increase in more intense and extreme rainfall events or sea level rise, which will increase the risk of flooding.

## Climate-related transition risks and impacts

To identify transition risks, we followed a four-step process:

- **Identify material climate-related risks and opportunities**
- **Apply climate transition scenarios across short, medium, and long-term time horizons**
- **Assess our current emissions against the Paris-aligned pathway**
- **Identify mitigation measures to address identified risks**

Our transition risk scenario analysis indicated that the key transition risks and opportunities fall into the following categories: policy and regulation, financial markets, customer expectations, employee expectations, and technology.

Our sustainability strategy is in place to respond to the identified climate-related risks and opportunities. For instance, based on the findings from our comprehensive review of physical risks in the regions where we operate, we have begun to engage landlords on climate-related physical and transition risks.

We are incorporating questions on these topics when entering or renewing leases for our office spaces. In terms of our transition risk management, we have set science-based emission reduction targets and have committed to procure **100%** renewable electricity by 2030.

We are currently in the process of refining our risk management framework to integrate the assessment of physical and transition climate-related risks and opportunities.

# Biodiversity

Biodiversity, or the variety of all living things on our planet, has been declining at an alarming rate in recent years. Biodiversity loss is of growing issue of concern globally, as evidenced by increased efforts to protect plant and animal species from extinction.

## Biodiversity audit

In 2023, we commissioned a third party to conduct a biodiversity audit for 14 of our office locations. The purpose of the audit was to gain a better understanding of the organization's potential impacts on biodiversity, including assessing whether sites of biodiversity importance are situated within 2 km of our leased office spaces.

## Results

The biodiversity audit revealed that seven of our leased office locations had no sites of biodiversity importance within a 2 km radius. However, the remaining seven of the leased office locations did have such sites located within a 2 km radius. Despite this, as tenants in existing office buildings, our daily operations are unlikely to affect these areas of biodiversity importance.

Potential impacts identified on sites of biodiversity importance included the possibility of employees using these areas recreationally (eg, during lunch breaks) and air pollution from employees commuting to the offices.

## Actions

Although the audit indicated our daily activities are unlikely to affect biodiversity significantly due to being tenants within existing buildings, we recognize that our employees can still play a role in the protection of biodiversity. We will utilize the audit results to educate employees at offices near biodiversity sites on best practices for recreational use, such as avoiding littering, sticking to footpaths, and respecting wildlife. Office managers will also be briefed to enhance biodiversity awareness.

We have incorporated the recommendations of this audit into our employee inductions for all offices to further reduce our impact. We also plan to conduct employee surveys at our Wilmslow and Sydney offices to better understand employee commuting patterns and recreational activity to further assess the potential impact on nearby biodiversity sites.

Additionally, we are incorporating environmental protection expectations into our Supplier Code of Conduct, requiring suppliers to continually reduce their environmental impact, prevent the release of hazardous materials into the environment, and ensure their products do not contain restricted or prohibited materials.





# ESG disclosure and governance

## Corporate governance

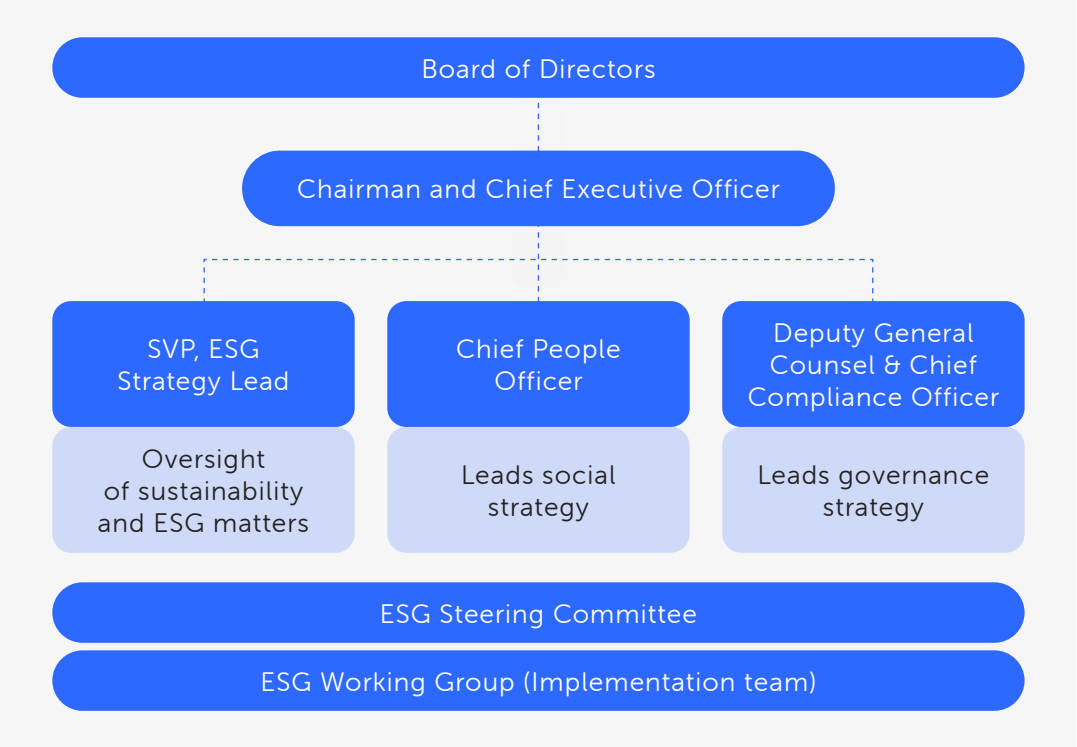
At Envision, robust corporate governance is crucial to maintaining transparency, integrity, and accountability in our operations. By establishing and upholding strong governance frameworks and policies, we build trust with our clients, employees, and business partners, ensuring the long-term success of our business. Our board oversees our strategy, operations, and performance, and our executive leadership team leads the day-to-day management of the organization.

The Governance and Compliance Steering Committee oversees and guides the governance and compliance efforts of the organization. The primary purpose of the committee is to ensure that Envision has appropriate governance, policies, procedures, and controls in place to comply with applicable laws, regulations, industry standards, and internal policies. The committee oversees governance and compliance-related activities within the organization, ensures compliance risks are assessed and prioritized, reviews and updates policies, and facilitates communication between certain control functions of the company and the executive leadership team.

## ESG governance

ESG is currently governed by several senior leaders across different business departments. In 2024, we are updating our ESG Steering Committee and ESG Working Group to lead the direction and implementation of our sustainability strategy globally. The ESG Steering Committee will meet monthly and will be responsible for collectively developing Envision's ESG strategy, setting and owning ESG targets, discussing and planning ESG initiatives, and communicating the ESG strategy. The ESG Steering Committee will report directly to the CEO and communicate progress against ESG goals and targets to all employees and stakeholders.

The CEO oversees the direction and commitments proposed by the ESG Steering Committee and provides visibility to the board on key ESG strategies and initiatives. Selected members of our executive leadership team (ELT) will sit on the ESG Steering Committee to ensure the direction meets the expectations of our stakeholders.



Our target

- Formalize ESG committee and disclose individual responsibilities by 2024

# ESG disclosure and governance

## Ethical business practices and regulatory compliance

At Envision, we are committed to acting professionally, fairly, and with integrity in all our business dealings and relationships. We also ensure compliance with all relevant laws and regulations of the countries in which we operate. We recently welcomed our new Deputy General Counsel & Chief Compliance Officer to the company, recognizing the importance this has to our business and the support needed.

## Ethical business conduct

In 2023, we adopted our Global Code of Ethics and Business Conduct (our “code”), which outlines our core principles of good business practice and our standards for professional and personal behavior. The principles of our code guide every decision and action, ensuring we conduct ourselves with integrity in the workplace. The code ensures that all Envision’s officers, directors, and employees are committed to the highest standards of compliance and ethical behavior and adhere strictly to all applicable laws and regulations.

Our code includes our position on the following issues:

- **Anti-kickback, bribery, and corruption**
- **Data privacy and confidentiality**
- **Conflicts of interest**
- **Human rights and labor standards**
- **Discrimination**

Our code outlines our expectations for avoiding conflicts of interest. In 2024, we will implement a Conflicts of Interest Policy that requires employees to communicate potential conflicts of interest to the legal department.

## Anti-kickback, bribery, and corruption

We expect strict compliance with our Anti-Corruption and Anti-Bribery Policy; we will not provide, offer, accept, or tolerate kickbacks, bribes, and all improper payments. A kickback or bribe may be defined as a payment of money or anything of value to obtain or retain business. In most countries, including the US and the UK, it is illegal to provide, offer, solicit, or accept a kickback or bribe. Envision is committed to complying with the anti-bribery, anti-kickback, and anti-corruption laws in all countries in which we operate, including the US Foreign Corrupt Practices Act 1977 and the UK Bribery Act 2010.

Many anti-corruption laws mean we are responsible for the acts of third parties acting on behalf of the company. Thus, we cannot make prohibited payments through third parties or anyone acting on the company’s behalf. Similarly, we are vigilant when engaging and managing third parties to ensure that those parties do not put the business at risk. We perform an annual assessment of our corruption risks, taking into account the countries where we operate, and the specific activities conducted in each jurisdiction.

## ESG risk management

In 2024 our Head of Compliance will be leading an effort to set up an enterprise risk management program. We are managing ESG risk by assessing physical and transition climate risks. In 2023, we undertook a climate risks and opportunities assessment to assess physical and transition risk. The assessment is summarized on **page 26**.

In 2024, we plan to proactively identify and mitigate risks associated with our suppliers through the adoption of a third-party management platform. This will enhance our understanding of the suppliers we use, their ESG management policies, and practices..

// **We are committed to acting professionally, fairly, and with integrity in all our business dealings and relationships.**

# ESG disclosure and governance

## Speak-up (whistleblower) policy

We believe that empowering our employees to voice their concerns without fear of retaliation is crucial to maintaining integrity and trust within our business. We have a whistleblower (speak-up) mechanism to empower employees to report unethical behavior. Our speak-up policy gives our employees a confidential way to raise concerns and promotes a culture of integrity and ethical decision-making. Those concerns might include discrimination, harassment, bribery and corruption, fraud, breaches of confidentiality, financial irregularities, safety issues, misconduct, unethical behavior, violations of law, violations of company policy, or any activity that could cause reputational harm to the business.

Employees are also able to submit a complaint anonymously through the online **Compliance Helpline Portal** (third-party hotline), where any issues reporting are investigated by our legal department and with the appropriate departments.

## Protection of human rights

We have a duty to respect the human rights of workers both in our operations and in our supply chain. We support and comply with the United Nations' Universal Declaration of Human Rights and seek to protect the human rights and well-being of all employees within the Envision group of companies. More specifically, the company respects and adheres to the International Labor Organization's (ILO) Declaration on Fundamental Principles and Rights at Work, and we implement a framework of policies and procedures designed to ensure fairness in the recruitment, development, and retention of all employees.

We take a zero-tolerance approach to modern slavery and are dedicated to maintaining a fair and ethical workplace for all our team members.

## Human rights in our supply chain

We also require our third-party suppliers to operate in a manner consistent with these principles. Our Supplier Code of Conduct assists our suppliers in understanding and complying with our expectations regarding human rights, prohibition of child labor, compulsory labor, or trafficked labor and the general health and safety of supplier employees. In each of these areas, we are committed to ensuring the continuous improvement of working conditions and management of labor risks in our global operations. Each Envision employee is encouraged to report any actual or potential violation of the relevant code, policy, or procedure.

## Embedding responsible business conduct

Envision embeds its policy commitments for responsible business conduct across all activities and business relationships by allocating clear responsibilities at each organizational level. To ensure our employees follow protocols that reflect these principles in their daily tasks, employees receive role-specific training on our key policies, including our code of ethics and business conduct, group human rights policy, general data protection regulation (GDPR), information security policies, and anti-bribery and corruption.

We also prioritize embedding these values within our business relationships by setting clear expectations and standards for our partners and suppliers, fostering a culture of mutual responsibility and ethical conduct. This comprehensive approach ensures that our policy commitments are actively practiced throughout the organization and its wider network.

// We believe that empowering our employees to voice their concerns without fear of retaliation is crucial to maintaining integrity and trust within our business.

# ESG disclosure and governance

## Information security and data privacy

In a world defined by digital innovation and data exchange, we must safeguard and promote the responsible use of personal data belonging to our employees, patients, healthcare professionals, and other partners with whom we engage. Maintaining robust data privacy control is vital to our operations, reputation, and the trust we have with clients, employees, and business partners. As a global company, our business practices are tailored to ensure we comply with all relevant data protection and privacy requirements.

### Our core privacy principles

Lawfulness, fairness, and transparency	Personal data must be processed lawfully, fairly, and in a transparent manner
Purpose limitation	Personal data must be collected for specified, explicit, and legitimate purposes
Data minimization	Personal data must be adequate, relevant, and limited to what is necessary
Accuracy	Personal data must be accurate and, where necessary, kept up to date
Storage period limitation	Personal data must be kept for no longer than is necessary for processing purposes
Integrity and confidentiality	Appropriate measures must be used to ensure appropriate data security

## Data privacy procedures

We maintained our International Standard Organization (ISO) 27001 certification in 2023. ISO 27001 is the globally recognized best practice standard that formally outlines requirements for an information security management system (ISMS). By implementing an ISMS certified to this standard, we demonstrate the fulfillment of commercial, contractual, and legal responsibilities, provide a common security approach within the business units, and a formal basis for interoperability between the business and our customers.

We protect prospective and existing clients with pertinent security and privacy regulatory requirements, such as Privacy Shield, the EU General Data Protection Regulation (GDPR), and California Customer Privacy Act (CCPA), and other laws and regulations relevant to the territories where Envision operates. We endeavor to retain our information security accreditations and extend their coverage where possible. In addition, we utilize data protection impact assessments to identify, analyze, and minimize data protection risks and have a process in place to appropriately respond to data subject access requests. Our global code of ethics and business conduct further enforces our principles for ensuring data privacy and confidentiality. Every Envision employee is obligated to protect the information of our customers, suppliers, shareholders, and third parties who disclose information in confidence.

## Quality management

We are certified to ISO 9001, which is the globally recognized standard for quality management. Implementing ISO 9001 ensures we have effective processes in place to maintain a high-quality service for our customers. This certification demonstrates our commitment to meeting our customer’s expectations and to quality.

### Our target



Align to an environmental ISO by 2025

# ESG disclosure and governance

## ESG Disclosure

Ensuring transparent disclosure of our sustainability data and progress against targets to our investors, shareholders, customers, clients, and employees is integral to tracking progress and performance and building trust. We published our first sustainability report in 2023 to communicate our strategy and objectives to stakeholders and will continue to do so annually. We use internationally recognized sustainability assessments and frameworks, such as EcoVadis and CDP, which aim to assess companies based on their commitment and performance against specific ESG criteria.



EcoVadis provides business sustainability ratings, intelligence, and collaborative performance improvement tools for global supply chains.



The United Nations Global Compact is a voluntary initiative that calls companies to align their strategies with universal principles of human rights, labor, environment, and anti-corruption, taking actions to advance societal goals.



In 2023, we reinforced our commitment to environmental transparency by disclosing our environmental impact through CDP, a global non-profit organization renowned for its leading environmental disclosure platform.



The Science Based Targets Initiative (SBTi) drives ambitious climate action in the private sector by enabling organizations to set science-based emission reduction targets.



The GRI provides a set of disclosures that allow an organization to report information about its impacts consistently and credibly.

### Our targets



- Achieve an EcoVadis score of **65 or above** by 2027
- Achieve a CDP Score **A** for the climate action questionnaire by 2030

### Our performance

We were awarded a Bronze EcoVadis medal for our performance in 2023, with an overall score of **56**, an increase of **20** points from our 2022 submission.

We signed up in 2024 to the UN Global Compact and plan to submit our latest report to the initiative.

We achieved a CDP climate action **B** rating for 2023, showing our dedication to environmental stewardship. We will continue to disclose to CDP and remain committed to improving our environmental performance.

We have updated our GHG emissions targets to follow SBTi guidance and officially committed to set our SBT in December 2023.

Our sustainability report has been prepared in accordance with the GRI standards. For our full GRI content index, please see **page 33**.



# GRI content index

The GRI Standards are a set of disclosures that allow an organization to report information about its impacts consistently and credibly. This enhances the global comparability and quality of reported information on these impacts, which supports information users in making informed assessments and decisions about the organization’s impacts and contribution to sustainable development. Envision has reported in accordance with the GRI Standards for the period January 1, 2023 to December 31, 2023. The reported disclosures are listed below:

GRI 1:	Foundation 2021
GRI 2:	General Disclosures 2021
GRI 3:	Material Topics 2021
GRI 204:	Procurement Practices 2016
GRI 205:	Anti-corruption 2016
GRI 302:	Energy 2016
GRI 304:	Biodiversity 2016
GRI 305:	Emissions 2016
GRI 308:	Supplier Environmental Assessment 2016
GRI 401:	Employment 2016
GRI 403:	Occupational Health and Safety 2018
GRI 404:	Training and Education 2016
GRI 405:	Diversity and Equal Opportunity 2016
GRI 406:	Non-discrimination 2016
GRI 409:	Forced or Compulsory Labor 2016
GRI 414:	Supplier Social Assessment 2016
GRI 418:	Customer Privacy 2016

Topics that are not included in the list were determined to be of lower materiality in our double materiality assessment and are not included in the GRI content index, however, this does not mean no actions are taken on these topics.

We have also mapped the GRI disclosures to the topics and requirements of the ESRS as our double materiality assessment was developed following the ESRS requirements.

# GRI content index

Statement of use		Envision Pharma Group has reported in accordance with the GRI Standards for the period January 1, 2023 to December 31, 2023	
Applicable GRI sector standards		No sector standards apply	
General disclosures			
GRI 2: General disclosures 2021			
Indicator	Description	2023 Disclosure/Omission	ESRS alignment
2–1	Organizational details	Company overview (pp. 4–5)	ESRS 1 – General requirements
2–2	Entities included in the organization’s sustainability reporting	Envision Pharma Group Limited (This is the parent company that acts as a holding for our other entities)	
2–3	Reporting period, frequency, and contact point	January 1, 2023 to December 31, 2023. Contact <a href="mailto:sustainabilityrequests@envisionpharmagroup.com">sustainabilityrequests@envisionpharmagroup.com</a> for any questions on the reported information	
2–4	Restatements of information	Not applicable, no restatements made in the reporting period	
2–5	External assurance	We have not obtained external assurance for our 2023 sustainability report but will look to obtain this assurance for future reports	
2–6	Activities, value chain, and other business relationships	Company overview (pp.4–5)	
2–7	Employees	Employee data (p.40)	
2–9	Governance structure and composition	Corporate governance (p.28)	
2–12	Role of the highest governance body in overseeing the management of impacts	Corporate governance (p.28)	
2–13	Delegation of responsibility for managing impacts	Corporate governance (p.28)	
2–14	Role of the highest governance body in sustainability reporting	ESG governance (p.28)	
2–16	Communication of critical concerns	Speak-up (whistleblower) policy (p.30) There were no critical concerns reported in 2023	

# GRI content index

General disclosures			
GRI 2: General disclosures 2021			
Indicator	Description	2023 Disclosure/Omission	ESRS alignment
2–22	Statement on sustainable development strategy	Sustainability strategy (p.11)	ESRS 1 – General requirements
2–24	Embedding policy commitments	Embedding responsible business conduct (p. 30) Ethical business practices and regulatory compliance (p.29)	
2–25	Processes to remediate negative impacts	Speak-up (whistleblower) policy (p.30)	
2–26	Mechanisms for seeking advice and raising concerns	Speak-up (whistleblower) policy (p.30)	
2–27	Compliance with laws and regulations	No significant instances of non-compliance with laws and regulations	
2–28	Membership associations	ESG ratings (p.32)	
2–29	Approach to stakeholder engagement	Double materiality assessment (p.9) Stakeholder engagement strategy (p.10)	
Material topics			
GRI 3: Material topics			
3–1	Process to determine material topics	Double materiality assessment (p.9)	ESRS 1 – General requirements
3–2	List of material topics	Impact and financial materiality assessment results (p.10)	
Topic standards and management of material topics			
GRI 204: Procurement practices 2016			
3–3	Management of material topics	Supply chain practices (p.21)	Not included in ESRS
204–1	Proportion of spending on local suppliers	We will start tracking the proportion of spend on local suppliers in 2024 as part of our supplier program	
GRI 302: Energy 2016			
3–3	Management of material topics (Energy)	Energy consumption (p.25)	ESRS 1 – General requirements
302–1	Energy consumption within the organization	Energy consumption (p.25)	ESRS E1 – Climate action (E 1.3 Energy)

# GRI content index

Topic standards and management of material topics (continued)			
GRI 302: Energy 2016 (continued)			
Indicator	Description	2023 Disclosure/Omission	ESRS alignment
302–2	Energy consumption outside of the organization	Energy consumption (p.25)	ESRS E1 – Climate action (E 1.3 Energy)
302–3	Energy intensity	Energy consumption (p.25)	
302–4	Reduction of energy consumption	Energy consumption (p.25)	
302–5	Reductions in energy requirements of products and services	Energy consumption (p.25)	
GRI 304: Biodiversity 2016			
3–3	Management of material topics	Biodiversity audit (p.27)	ESRS 1 – General requirements
304–1	Operational sites owned, leased, managed in, or adjacent to, protected areas and areas of high biodiversity value outside protected areas	Biodiversity audit (p.27)	ESRS E4 – Biodiversity and ecosystems (4.1 Direct impact drivers of biodiversity loss)
304–2	Significant impacts of activities, products and services on biodiversity	Biodiversity audit (p.27)	ESRS E4 – Biodiversity and ecosystems (4.4 Impacts and dependencies on ecosystem services)
304–3	Habitats protected and restored	Not applicable – no habitats protected and restored	ESRS E4 – Biodiversity and ecosystems (4.2 Impacts on the state of species)
304–4	IUCN Red List species and national conservation list species with habitats in areas affected by operations	Biodiversity audit (p.27)	ESRS E4 – Biodiversity and ecosystems (4.3 Impacts on the extent and condition of ecosystems)
GRI 305: Emissions 2016			
3–3	Management of material topics	Greenhouse gas emissions (p.23)	ESRS 1 – General requirements
305–1	Direct (Scope 1) GHG emissions	Greenhouse gas emissions (p.23)	Not included in ESRS
305–2	Energy indirect (Scope 2) GHG emissions	Greenhouse gas emissions (p.23)	
305–3	Other indirect (Scope 3) GHG emissions	Greenhouse gas emissions (p.23)	
305–4	GHG emissions intensity	Greenhouse gas emissions (p.23)	
305–5	Reduction of GHG emissions	Greenhouse gas emissions (pp.23–24)	
305–6	Emissions of ozone-depleting substances (ODS)	Not applicable – No emissions of ozone-depleting substances	
305–7	Nitrogen oxides (NOx), sulfur oxides (SOx), and other significant air emissions	Not applicable – No nitrogen oxides (NOx), sulfur oxides (SOx), or other significant air emissions	

# GRI content index

Topic standards and management of material topics (continued)			
GRI 308: Supplier environmental assessment 2016			
Indicator	Description	2023 Disclosure/Omission	ESRS alignment
3–3	Management of material topics	Supply chain practices (p.21)	ESRS 1 – General requirements  Not included in ESRS
308–1	New suppliers that were screened using environmental criteria	Information unavailable – Our Supplier Program was launched in 2023. This information will be available for 2024	
308–2	Negative environmental impacts in the supply chain and actions taken	Information unavailable – Our Supplier Program was launched in 2023. This information will be available for 2024	
GRI 401: Employment 2016			
3–3	Management of material topics	Envision’s people (pp.13–16)	ESRS 1 – General requirements
401–1	New employee hires and employee turnover rate	We hired 282 new employees in 2023 Our employee turnover rate was 18% in 2023	ESRS S1 – Own workforce
401–2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	Corporate culture (p.16)	
401–3	Parental leave	Information unavailable	ESRS S1 – Own workforce – S1.1 Working conditions (Work-life balance)
GRI 404: Training and education 2016			
3–3	Management of material topics	Employee training and development (p.14)	ESRS 1 – General requirements  ESRS S1 – Own workforce – S1.2 Equal treatment and opportunities for all (Training and skills development)
404–1	Average hours of training per year per employee	Information unavailable	
404–2	Programs for upgrading employee skills and transition assistance programs	Employee training and development (p.14)	
404–3	Percentage of employees receiving regular performance and career development reviews	Information unavailable – we will report on this for 2024	
GRI 405: Diversity and equal opportunity			
3–3	Management of material topics	Diversity, equity, and inclusion (pp.17–18)	ESRS 1 – General requirements
405–1	Diversity of governance bodies and employees	Envision’s people (p.13)	ESRS S1 – Own workforce – S1.2 Equal treatment and opportunities for all (Diversity/Gender equality and equal pay for work of equal value)
405–2	Ratio of basic salary and remuneration of women to men	Pay equity (p.18)	

# GRI content index

Topic standards and management of material topics (continued)			
GRI 406: Non-discrimination 2016			
Indicator	Description	2023 Disclosure/Omission	ESRS alignment
3–3	Management of material topics	Diversity, equity, and inclusion (pp.17–18)	ESRS 1 – General requirements
3–3	Management of material topics	Diversity, equity, and inclusion (pp.17–18)	ESRS S1 – Own workforce – S1.2 Equal treatment and opportunities for all (Employment and inclusion of persons with disabilities/Measures against violence and harassment in the workplace)
406–1	Incidents of discrimination and corrective actions taken	Information unavailable	
GRI 418: Customer privacy 2016			
3–3	Management of material topics	Information security and data privacy (p.31)	ESRS 1 – General requirements
418–1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	No identified substantiated complaints in 2023	ESRS S4 – Consumers and end-users – S4.1 Information-related impacts for consumers and/or end-users
GRI 403: Occupational health and safety 2018			
3–3	Management of material topics	Occupational health and safety (p.14)	ESRS 1 – General requirements
403–1	Occupational health and safety management system	Occupational health and safety (p.14)	
403–2	Hazard identification, risk assessment, and incident investigation	Occupational health and safety (p.14)	
403–3	Occupational health services	Information unavailable	
403–4	Worker participation, consultation, and communication on occupational health and safety	Information unavailable	
403–5	Worker training on occupational health and safety	Occupational health and safety (p.14)	ESRS S1 – Own workforce – S1.1 Working conditions (Health and safety)
403–6	Promotion of worker health	Corporate culture (p.16)	
403–7	Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	Occupational health and safety (p.14)	
403–8	Workers covered by an occupational health and safety management system	Information unavailable	
403–9	Work-related injuries	Information unavailable	
403–10	Work-related ill health	Information unavailable	



# GRI content index

Topic standards and management of material topics (continued)			
GRI 205: Anti-corruption 2016			
Indicator	Description	2023 Disclosure/Omission	ESRS alignment
3–3	Management of material topics	Anti-kickback, bribery, and corruption (p.29)	ESRS 1 – General requirements
205–1	Operations assessed for risks related to corruption	Anti-kickback, bribery, and corruption (p.29)	
205–2	Communication and training about anti-corruption policies and procedures	Embedding responsible business conduct (p.30)	ESRS S1 – Business conduct (G1.7 Corruption and bribery)
205–3	Confirmed incidents of corruption and actions taken	No incidents of corruption reported in 2023	
GRI 409: Forced or compulsory labor 2016			
3–3	Management of material topics	Protection of human rights (p.30)	ESRS 1 – General requirements
409–1	Operations and suppliers at significant risk for incidents of forced or compulsory labor	Information unavailable	ESRS S1 – Own workforce (S1.3 Other work-related rights (Forced labor))
GRI 414: Supplier social assessment 2016			
3–3	Management of material topics	Supply chain practices (p.21)	ESRS 1 – General requirements
414–1	New suppliers that were screened using social criteria	Information unavailable – Our Supplier Program was launched in 2023. This information will be available for 2024	ESRS S2 – Workers in the value chain (S2.1 Working conditions/ S2.2 Equal treatment and opportunities for all/ S2.3 Other work-related rights)
414–2	Negative social impacts in the supply chain and actions taken	Information unavailable – Our Supplier Program was launched in 2023. This information will be available for 2024	Not included in ESRS

# GRI content index

## Employee data

Employees by gender*			
Male	Female	Other	Total
Number of employees (headcount)			
521	874	8	1403
Number of permanent employees (headcount)			
516	871	2	1389
Number of temporary employees (headcount)			
5	3	6	14
Number of full-time employees (headcount)			
505	776	7	1288
Number of part-time employees (headcount)			
16	98	1	115

\* Numbers are reported in headcount at the end of the reporting period (December 31, 2023)

Employees by region*				
US/Canada	UK	Europe	Japan and Asia-Pacific	Total
Number of employees (headcount)				
841	411	102	49	1403
Number of permanent employees (headcount)				
841	404	95	49	1389
Number of temporary employees (headcount)				
0	7	7	0	14
Number of full-time employees (headcount)				
816	331	99	42	1288
Number of part-time employees (headcount)				
25	80	3	7	115

# Appendix

## 2024 Sustainability targets

	2023 target	2024 target	Comment
Diversity, equity, and inclusion	Achieve 50/50 male representation in senior leadership positions by 2028	Achieve gender balance across senior teams by 2028	We have achieved all of our 2023 diversity, equity, and inclusion targets. We have recently redefined our DEI commitments and aspirations, developing an enterprise DEI policy. For 2023, we have set new targets and sub-targets to ensure we are progressing against a wider range of DEI issues. For example, we plan to increase our focus on neurodiversity awareness and support in 2024
	Develop and publish an enterprise diversity, equity, and inclusion policy with an established governance committee by 2023	Achieve 10% mean gender pay gap by 2030	
	100% of hiring managers receive training on diversity, equity, and inclusion by 2023	Develop processes, tools, and committees to improve DEI by 2025	
		Develop processes and tools to support employees with neurodiversity by 2025	
Envision's people <sup>1</sup>	100% of employees have access to wellness and Employee Assistance Programs and flexible work arrangements by 2025	100% of employees covered by our enhanced wellness programs by 2025	We have achieved all of our 2023 Envision's people targets. We aim to ensure all employees are informed about our ESG efforts and commitments and are confident understanding sustainability topics. We have established a new goal to train all employees on ESG by 2025. Additionally, we have updated our Employee Assistance Program, leading to a new target to reflect this change. We have also set new targets relating to required policy updates
	100% of offices covered by health and safety reviews by 2023	100% of employees to receive ESG training by 2025	
	100% employees to complete display screen equipment assessments by 2023	Living wage policy and employee rights policy to be implemented by 2025	
Community engagement		Establish an annual volunteering day supporting local community by 2024	
		Continue to support our local communities by partnering with local charities	
		Create a community engagement plan/community support framework by 2025	

<sup>1</sup> Envision's people: Focus area previously named "Employee Health, Safety and Wellbeing"

# Appendix

## 2024 Sustainability targets

	2023 target	2024 target	Comment	
Climate action <sup>1</sup>	25% decrease of Scope 1 and 2 emissions by 2030 from a 2019 baseline	Reduce Scope 1 and 2 emissions 55% by 2030 from a 2022 base year	As our 2023 Scope 1 and 2 emissions reduction target was achieved, we have set a more ambitious target for 2024. Our target to procure 100% renewable electricity by 2030 has been included as a sub-target to help reach our new Scope 1 and 2 emissions target. We have added new targets relating to business travel emissions and managing and assessing climate-related risks. We have also added new sub-targets that focus on initiatives to reduce our Scope 3 emissions	
	Procure 100% renewable electricity by 2030			
	Develop a science-based target by 2023			Set Scope 3 targets and validate with the SBTi by 2025
	10% decrease of Scope 3 emissions by 2030 from a 2022 baseline			Reduce business travel emissions by 10% by 2028
	Conduct climate risk and opportunities assessment by 2023			Integrate climate-related risks into our risk management approach by 2025
Supply chain practices	Develop a supplier program (by 2023) to implement (by 2024)	100% suppliers compliant with Suppliers Code of Conduct by 2028	We have met our target to develop a supplier program, with our Supplier Code of Conduct being approved at the end of 2023. We have set new targets and sub-targets which outline the actions we need to complete as part of our supplier program, launching in 2024	
	Publish supplier diversity/responsible sourcing program information on our website by 2024	Implement enterprise-level third-party management platform for supplier assessment platform by 2024		
	Develop a strategy to increase spending with small and local suppliers by 2024			
				Implement low or no-plastic options across our suppliers' products by the end of 2025
ESG disclosure and governance <sup>2</sup>	Maintain information security accreditation (ISO 27001), quality management system (ISO 9001), and SOC 2 standard	Align to an environmental ISO by 2025	We have achieved our targets relating to maintaining ISO 27001, ISO 9001, and SOC 2. We have also achieved our targets relating to EcoVadis, CDP, GRI, and developing our ESG strategywebsite section. Our targets related to EcoVadis and CDP have been revised to be more ambitious. As we have achieved our target to establish an ESG committee, a new target has been set to formalize the group and disclose individual responsibilities. Our target to align to an environmental ISO is in progress	
	Align to an environmental ISO (by 2025)			
	Establish an ESG committee by 2023			Formalize ESG committee and disclose individual responsibilities by 2024
	Align sustainability report to the global reporting initiative by 2024	Achieve an EcoVadis score of 65 or above (advanced level) by 2027		
	Develop a website section disclosing ESG strategy and progress by 2023			
	Achieve an EcoVadis score of 50 and above by 2025			
	Achieve CDP Score B for the climate action questionnaire by 2027	Achieve CDP Score A for the climate action questionnaire by 2030		

<sup>1</sup> Climate action: Focus area previously named "GHG Emissions/Environmental Impact"

<sup>2</sup> ESG disclosure and governance: Merged focus area previously named "Ethics and Compliance and Disclosure and Transparency"