



ESG Report

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



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Executive Introduction

“

At EQ Group our ambition is to ensure that our business grows in a responsible and sustainable way. For us this means advocating for our customers, our local communities, our suppliers, our colleagues and the environment in decisions we make.

We are working on embedding principles of responsible business through our focus on collaborative partnerships and strong governance. We invest in sustainable growth and consistently aim to improve our impact on environmental sustainability, social responsibility, and corporate governance.”

A handwritten signature in white ink, appearing to read 'Adam Green', with a stylized, flowing script.

Adam Green
Chief Risk Officer, EQ Group
July 2025

Values & Vision

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



trusted
to deliver on our commitments



collaborative
in our approach



commercial
in our focus on building long term value



improve
by continually enhancing our skills and services

EQ’s strategy is to be experts at providing shareholder, pension and remediation services via technology to help our customers around the world succeed. To support this strategy, EQ is becoming product-led, meaning a greater emphasis will be placed on developing products driven by customer needs, and prioritising excellence and customer satisfaction.

We’re going far together...



EQ in Numbers

#1 in the UK
for Share
Registration

#2 in the U.S.
Transfer agent
by market share

#1 in the U.S.
for IPOs

#1 in the UK
Public Sector
Pension
Administration



~6500

EQ Employees worldwide



35%

S&P 500 (transfer
agent)

53%



of the FTSE100 UK use our
shareholder services

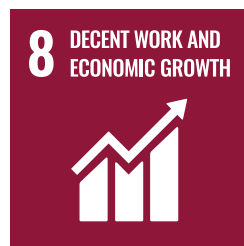


1 in 3

UK pensioners paid
by our systems

Sustainable Development Goals

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



ESG in EQ

We are committed to:

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

Our aim is to:

- Become the leader in our chosen markets, supporting sustainable economic initiatives
- Offer products and services that foster sustainable growth
- Operate responsibly, always upholding the highest ethical values
- Digitise and innovate, to ensure digital privacy, to enhance the experience of our customers and become more accessible, particularly for vulnerable customers
- Ensure good outcomes and fair treatment for our customers
- Provide a work environment that supports the wellbeing and development of our people
- Minimise our environmental footprint by adopting and promoting environmentally friendly practices
- Provide opportunities for colleagues to assist in our sustainability initiatives via our voluntary colleague-led Eco Network
- Promote and encourage colleagues across EQ to work collaboratively with the business to make a positive impact on the planet. An example of this is our colleague-initiated Eco Pledge, signed by more than 4000 colleagues
- Give back to the communities we operate in



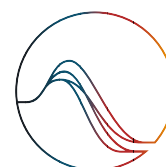
Environmental



Environmental Targets & Actions

We have already made good progress towards our emissions targets and the following actions were undertaken in 2024:

- Property rationalisation completed resulting in a net decrease of 135,759 square feet across the Group
- In our UK operations reducing our physical server infrastructure, decommissioning older servers and introducing 90 per cent fewer modern, energy-efficient servers
- Digitisation (ongoing) of services
- Ongoing LED transformation in 3 of our largest group offices
- UK office printer paper sourced from eucalyptus trees



SCIENCE
BASED
TARGETS

DRIVING AMBITIOUS CORPORATE CLIMATE ACTION

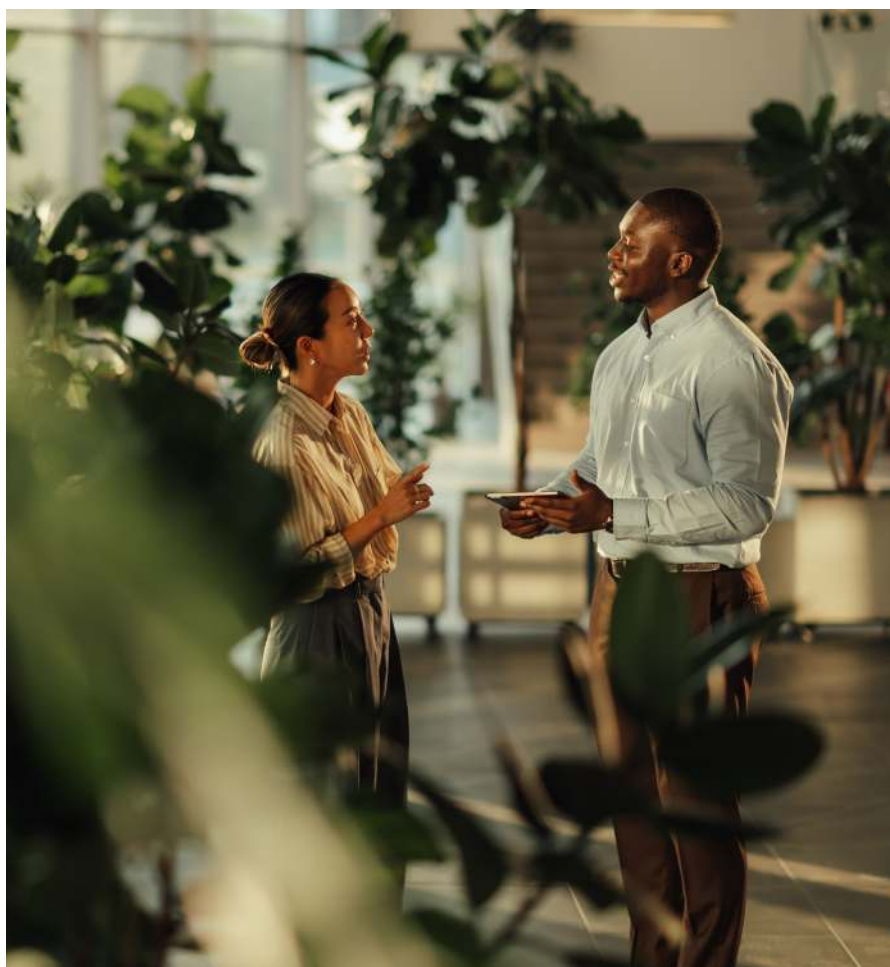
EQ Group has approved near and long-term science-based emissions reduction targets with the Science Based Targets initiative (SBTi).

EQ Group commits to:

- **By 2040**
Reach net-zero greenhouse gas emissions across the value chain
- **By 2029 from a 2019 base year**
Reduce absolute scope 1, 2 and 3 GHG emissions 49%
- **By 2040 from a 2019 base year**
Reduce absolute scope 1, 2 and 3 GHG emissions 90%

Looking ahead, EQ is committed to sustainable growth and our plans to reduce emissions include:

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



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



Energy



Agile Working



Travel



Supply Chain

Environmental Performance

Our GHG CO₂e emissions (tCO₂e) performance:

	2019 Pre-recalculation (Target Base year)*	2019 Recalculated (Target Base year)**	2020*	2021*	2022**	2023**	2024**
Scope 1	480	720	297	829	1,089	986	874
Scope 2	1,916	2,771	950	734	2,000	2,002	895
Scope 3	3,918	7,752	1,106	1,284	2,981	3,367	5,433
Total	6,314	11,243	2,353	2,847	6,070	6,355	7,202

* 2019 pre-recalculation, 2020 and 2021 are for legacy EQ business (pre-acquisition by Siris in December 2021).

** 2019 Recalculated and 2022 to 2024 represent the combined group acquired by Siris in December 2021.

EQ has undergone a period of employee and revenue growth between the Base Year 2019 and 2024. We have increased our number of employees by 5.9% and revenue by 6.2%. In December 2021 Siris acquired EQ and AST and the organisations were combined, increasing our US business significantly. We have also grown our presence in India between the Base Year 2019 and 2024.

In comparison to our base year 2019, by the end of 2024 we have:

- reduced absolute emissions per £1m revenue by 39.9%, and
- reduced absolute emissions per employee by 39.8%

	2019 (Base Year)	2024
tCO ₂ e per £1m revenue	15.13	9.1
tCO ₂ e per employee	1.81	1.09

Keeping base year in step with organisational changes:

In December 2021 Siris acquired EQ and AST and the organisations were combined. During 2024 we completed our Base Year recalculation to include the legacy AST entities.

The main changes in the base year recalculated emissions are as follows:

AST legacy businesses: **2,331.0** tCO₂e.

Commuting (adoption of DEFRA conversion factors for the EQ legacy business): **1,355.0** tCO₂e.

Electricity (WTT and T&D factors added for electricity for the EQ legacy business to be consistent with current reporting, and inclusion of Amsterdam office): **1,021.0** tCO₂e.

Environmental Risk Assessment, Impact & Resilience

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

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

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

Climate-related Risks and Opportunities

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

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

1.5 DEGREES BY 2040 CLIMATE CHANGE DRIVERS		WIDER SOCIETAL/ ECONOMIC IMPACTS	EQ COLLEAGUES	EQ CUSTOMERS	EQ SUPPLIERS	EQ GLOBAL OPERATIONS AFFECTED	CURRENT RESILIENCY MEASURES
PHYSICAL RISK:	Sea level rise and Rainfall – Flooding	Displacement/ movement of people/increase in costs	Relocation/ rehousing of staff (mobility of staff)	Continuity of service, increase FM/IT resilience planning and costs	Continuity of supply chain	Chennai (Flooding), Mid West US, (Great lakes), East Coast US (sea level), Worthing (Flood Plain)	US (data centre locations), UK (relocation risk), Chennai/ Bengaluru (split of some functions)
	Rising temperature – Heatwaves	Human illness, decrease localised productivity	Quality of workplace and transportation. Impact on living conditions.	Productivity loss impacting service levels	Increase costs by water/energy suppliers	All sites including home working	Invoke resilience strategy where necessary
	Water Availability – Drought	Displacement/ movement of people/ supply chain breakdowns/ food and water shortages	Shortages and costs of supply.	No direct impact on customers	Supply chain delays	Indian sites where droughts increasing	Chennai/ Bengaluru reciprocal resilience
	Forestry – Wild Fires	Displacement/ movement of people/pollution – health/rising carbon emissions/ destruction of ecological and industrials infrastructures/ infectious disease rise	Relocation/ rehousing of staff (mobility of staff) – increase in health/ pandemic threat	Continuity of service	Continuity of supply chain (cloud computing, hardware provision)	Mid-West & East Coast US (smoke from Canadian Wildfires)	US (distribution of workforce)
	Earthquakes, Hurricanes, Tornadoes, Cyclones, Blizzards/ Storms (Nor'easters)	Displacement/ movement of people/pollution/ destruction of infrastructure/ resilience invocation costs	Relocation/ rehousing of staff (mobility of staff). IT Infrastructure outages	Continuity of service, increase FM/IT resilience planning and costs	Continuity of supply chain (e.g., cloud computing, internet and telecoms services)	Chennai (Cyclone), Mid West US (Tornadoes/ Storms/ Blizzards), Mid Atlantic US (Hurricanes, Storms, Earthquakes)	US additional data centre, US remote/ distribution of workforce for site loss, US Mid West dual sites. Chennai/ Bengaluru split of some functions.

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

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

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

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



Recycling

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

We encourage colleagues to:

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

We have also implemented the following:

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



Climate Awareness & Initiatives

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

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

- Creation of a seven principle Eco Pledge which has been signed by more than 4000 colleagues
- An electric vehicle scheme for UK colleagues and installation of EV charging points at main UK offices, for a greener commute
- Becoming an official sponsor of the British Beekeeping Association
- The sowing of EQ's first wildflower garden at flagship Worthing, UK office to encourage pollination
- A special 'thank you for being green' e-card was added to EQ's social recognition platform to allow colleagues to recognise each other for positive environmental behaviours
- Promotion and awareness of Veganuary every year
- Colleague-led 'Lunch and Learn' talks on reducing your carbon footprint and reducing plastic



Eco Pledge Principles

I pledge to:

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

Colleague EV Scheme and Charging Points

In June 2023, EQ partnered with Octopus to save colleagues up to 40% on leasing a brand new electric car through salary sacrifice. In the first 12 months, 47 cars have been delivered/ordered and **our colleagues already made quite an impact on the environment:**

They have saved

39 tonnes of CO2 emissions

That's as much as

19,518  trees can absorb

Forecasted*

They will have saved

296.3 tonnes of CO2 emissions

That's as much as

148,140  trees can absorb

Equal to...

507  round trip flights from **London to Munich!**

* By the end of all leases, both delivered and ordered cars, what will be the total CO2 saved/trees planted equivalent

Environmental Learning and Awareness

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

Building a Culture of Awareness

We are committed to fostering a culture where employees at every level are informed and empowered to contribute to our climate goals. To support this, we are working on a dedicated LinkedIn Learning pathway focused on sustainability, climate change, and environmental stewardship. This curated programme provides our teams with accessible, expert-led content covering a broad spectrum of topics from carbon literacy and sustainable business practices to the global implications of climate policy.

Learning that Drives Action

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

Social



ED&I – Colleague Engagement & Initiatives

Examples of actions taken to date include:

- A multi million pound investment in our office environments
- Launch of peer-to-peer recognition scheme
- Enhanced global wellbeing offering
- Summer socials for all colleagues, increasing belonging and creating connection

‘Be included, be yourself’ is our EQ mantra and we seek to achieve a diverse, open and inclusive culture, which represents the society in which we all live and work. Our colleague-led Wellbeing, Inclusion and Multicultural networks are central to this alongside our executive sponsors who are held accountable by our Global, Executive led, Council. We have an established wellbeing agenda to support this, including the Vitality Wellbeing App, Mental Health First Aiders and Colleague Assistance Programmes.

Engagement is a priority at EQ, with employee voice core to our approach. We seek monthly feedback through our engagement survey and Global Colleague Forum, monitoring the results at all levels of the business and using them to drive positive change and communications.



Colleague Networks & Inclusivity Charter

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

EQ also has the following Colleague-Led Networks:

Multicultural

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

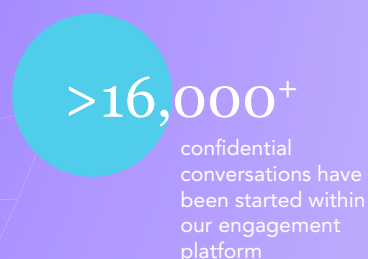
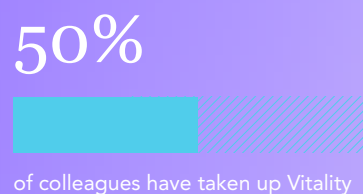
Inclusion

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

Wellbeing

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

We believe that when people feel able to be themselves and express their views at work, they come together to create a stronger business. In 2021, EQ launched a new pledge for inclusion. The Inclusivity Charter shares seven simple principles that encourage us to consider things from the perspective of others to value difference and advocate for change. It was shaped by the many members of EQ's equity, diversity and inclusion networks, to show that we don't have to leave parts of our identity behind when we come to work.



Global Colleague Forum

Mission

To champion effective communication and engagement throughout EQ and ensure the voices of colleagues are heard, supporting our ambition to deliver exceptional business performance and make EQ a great place to work.

Why do we have a Global Colleague Forum?

At EQ, we are committed to improving colleague experiences and it is vital that we seek feedback through a variety of channels, one of which is our colleague forum. We have elected representatives from across the business who are passionate about listening to colleagues' views, being a critical friend and delivering real improvements to colleagues' experiences.

The Forum aims to:

- Increase transparency and dialogue
- Build understanding of the company's strategy, policies, business performance, mission, purpose and values amongst employees
- Connect non-executive Directors directly with the voice of colleagues
- Build trust, increase engagement and retention by providing a platform for employees to voice their opinions and influence outcomes
- Provide colleagues an opportunity to raise employment-related issues
- Improve business performance through employee-contributed ideas, innovation and productivity improvement
- Influence behaviours and affect culture change
- Comply with the requirements of the Corporate Governance Code



Wellbeing

As part of its commitment to proactive health management, EQ launched the Vitality Wellbeing App in January 2024. This platform offers personalised health insights, activity challenges, and rewards for healthy behaviours, encouraging employees to take ownership of their wellbeing. The app has already achieved an impressive uptake, with 50% of UK employees actively engaging in its features. Following its success in the UK, the Vitality offering was extended in 2025 to include our US colleagues.

EQ utilises a People Dashboard to track key metrics, including sickness absence, holiday usage, and stress-related leave. Closely monitoring these indicators, the People team can identify trends and implement targeted initiatives before issues escalate.

Data from the Dashboard is also used to run stress management workshops and campaigns encouraging employees to take their full holiday entitlement, ensuring that everyone has the opportunity to recharge.

Employees are empowered and encouraged to set regular breaks, schedule interruption-free focus time and discourage out-of-hours emails using a suite of digital tools. This includes the automatic scheduling of meetings 25 or 50 minutes in length to promote breaks between meetings.

In 2025 EQ gifted all colleagues an additional day of leave as a wellbeing initiative, to encourage colleagues to recharge away from work – placing it in the upper quartile of the market.

MHFA Support

A key pillar of EQ's colleague wellbeing approach is the emphasis on mental health support. It has significantly expanded its network of Mental Health First Aiders, ensuring colleagues in need can access immediate assistance and guidance. These first aiders participate in regular training and refresher sessions, maintaining a high standard of care.

Furthermore, EQ provides all colleagues with access to a free employee assistance programme, connecting them to counselling and 24/7 advice on a huge range of topics which may impact their wellbeing. Additional mental wellbeing services are available through its Vitality partnership, such as meditation and mindfulness tools via Headspace.

EQ also collaborates with the Employers' Initiative on Domestic Abuse (EIDA), a UK organisation which provides resources and training for managers. This enables leaders to handle sensitive issues with empathy and understanding, reinforcing a supportive workplace where all employees feel safe. US colleagues have access to an Employee Assistance Program provided by ComPsych. The program provides free confidential telephone or face-to-face counselling services.

ED&I – Measures & Actions

Unconscious Bias

Colleagues in EQ India recently launched the #EmpowHer initiative, to support growth opportunities for female colleagues.

This initiative has played host to a number of inspiring events so far:

Creating Inclusive leaders – Managing Unconscious Bias: 100 colleagues including all people managers, the HR, recruitment and L&D teams joined these in-person workshops, challenging their own unconscious biases to #IMPROVE their leadership skills.

Women of EQ: These monthly in-person drop ins for female colleagues provide a forum for open dialogue and sharing best practices and ideas. Themes of discussion so far have been building your personal brand, the value of mentorship, self-care and managing competing priorities, vision boarding and setting achievable goals.

Recruitment

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

EQ has established a recruitment strategy that prioritises transparency and equality of access. The company tracks demographics through specific recruitment KPIs, which measure progress against census data and local labour market benchmarks.

This approach ensures that hiring practices align with its broader goals of achieving equity in gender, ethnicity, and overall representation. EQ closely monitors candidates throughout the hiring process to identify and address any disparities.

This data is used to shape recruitment campaigns aimed at attracting a diverse range of talent, with a particular focus on underrepresented groups.

The firm's commitment to its pipeline is demonstrated further by its recruitment practices and the measures it has introduced to reduce bias:

- All hiring managers must complete mandatory unconscious bias training, which forms part of a comprehensive interview preparation programme
- Regular refresher courses help maintain these principles over time. Additionally, our people have unlimited access to LinkedIn learning and all the recruiter and unconscious bias training and learning that is available
- EQ deliberately removes unnecessary academic or professional qualifications unless essential. This means that, for example, a university degree is not always required; the emphasis is instead on relevant skills and practical experience
- Additionally, interview questions for entry-level roles are standardised to ensure a fair and consistent process, while senior roles are increasingly assessed by diverse interview panels

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

Investing in People: Development, Inclusion, and Opportunity

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

Our learning and development strategy is designed to empower colleagues with the skills, knowledge and confidence they need to thrive in a dynamic business environment. Through our partnership with LinkedIn Learning, all employees have access to over 20,000 expert courses, enabling personalised learning that fits around individual roles and career goals.

In addition to digital learning, we offer structured training programmes through our EQ Horizons team, providing access to 87 different apprenticeship standards, ranging from Level 2 programmes all the way up to Level 7 (Master level), alongside a wide range of external qualifications.

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

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

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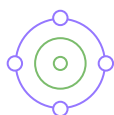
My lengthy career started in July 1984 when my Dad got me a summer job opening post as the UK went privatisation crazy. That summer job turned into 41 years of service during which I have held more than 30 roles and led up to 1000 colleagues in operations across 15 locations. The highlights included, leading so many great teams in operations, setting up our first Chennai operation, implementing our operating platform in both the UK and US and finishing my career working with my fantastic team in Minnesota.

I've changed roles every few years, and taken every new opportunity that came my way, even when I wasn't always ready. In return, I'm proud to have had such a great career at EQ with so many highlights. It's so true that if you're prepared to challenge yourself and work hard, EQ can offer you a fantastic career where you can develop so many different skills, leadership qualities and grow as a person.”

Steve Binstead, Senior Lead – Operational Delivery

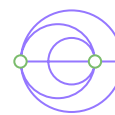
EQ's Equity, Diversity, and Inclusion 2030 Commitment

‘We are ambitious in our **Equity, Diversity and Inclusion** ambitions which are underpinned by action plans to deliver for the benefit of all our stakeholders’



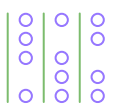
Be Yourself

By 2027, we aim to have inclusion data for 85% of colleagues, following our #thisisme campaign, rising to 95% by 2030.



See Yourself

By 2027, we will achieve gender parity for all leadership roles and by 2030, leadership will be reflective of the communities in which we live and work.



Evaluate Yourself

By 2027, the business will be in the Top 10 globally for its Diversity, Equity and Inclusion policies and practices, increasing to The Top 5 by 2030 both externally, and reflected by our internal Engagement scores.



Involve Yourself

By 2027, our Diversity, Equity and Inclusion networks will have increased community engagement by 50% and by 2030, 20% of ambassadors paid time will be spent investing in initiatives and driving measurable change within EQ.



Give Yourself

By 2027, 75% of colleagues will have taken their volunteering days to serve their local communities, rising to 90% by 2030.



Develop Yourself

By 2027, 35% of self-directed learners will have leveraged Diversity, Equity and Inclusion courses, increasing to 50% by 2030.

Preventing Discrimination & Harassment

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

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

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

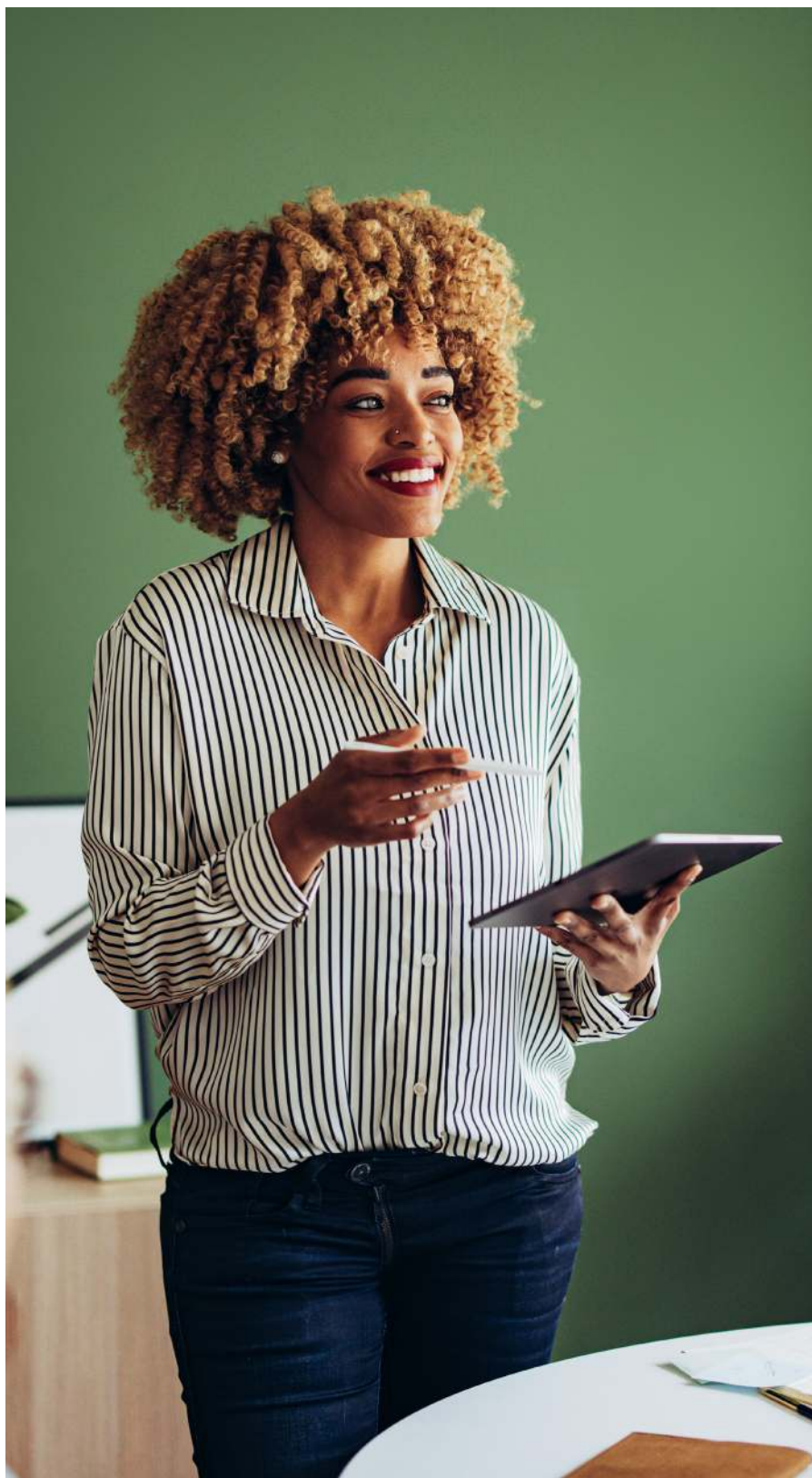
Actions	Locations	Number/% of colleagues completed 2024
Core Responsibilities attestation on Anti-Discrimination/Harassment Policy and workplace harassment	All locations	99.86%
Mandatory training on Equity, Diversity and Inclusion (including Discrimination and Harassment)	All locations	99.75%
Mandatory training on Prevention of Sexual Harassment	India	95%
Colleague awareness session on Prevention of Sexual Harassment	India	93%
Quarterly Prevention of Sexual Harassment Committee Meeting	India	3 committee members

Wage Equality – Measures & Actions

25.58%

Gender Pay Gap
has closed by
0.13%

At EQ, we remain committed to creating an inclusive working environment in which every employee can fulfil their potential and maximize their contribution, supported by our Gender Pay Gap commitments. We are pleased to report the 2024 UK mean Gender Pay Gap has closed by 0.13% to 25.58%. This is mainly due to our 2022 and 2023 pay review approach, awarding a higher percentage to those who are lower paid, meaning we are bringing up the pay of females at a faster rate than males.



Employee Health & Safety

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

We commit to:

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



Awards & Accreditations

For three years running, EQ has been certified as a Top Employer in the UK, US and India. Being certified as a Top Employer is a huge seal of approval for potential and existing colleagues, setting us apart in a challenging market. It showcases our commitment to a better world of work, exhibited through our HR policies and people practices and reinforces the ongoing drive to listen to colleagues while transforming our business. In 2024 we were ranked as the 15th best company to work for amongst UK Top Employers and in 2025, EQ was accredited as a Top Employer in each of its operating countries, for the second year running with a 3% improvement from 2024. EQ is currently ranked 6th in the UK, 4th in the US and in the Top 5 in India with 8 areas achieving scores of 100%; Business Strategy, Digital HR, Work Environment, Onboarding, Performance, Employee Listening, Purpose & Values and Ethics & Integrity.

We've also won several awards and gained several accreditations during the last two years.

in the US

Best company to work for amongst US Top Employers

These are some of EQ's recent awards/accreditations



#6 in the UK



#4 in the U.S.



Top 25% in India



FT Best Employers
2025 #2 in financial
services



FT Best Employers
2025 #26 in UK



CIPD Best People
Analytics Initiative



CIPD HR Team
of the Year



CIPD Best Health &
Wellbeing Initiative



Excellence in CSR
& Sustainability



Most Preferred
Workplace



Best Organisations
or Women (EQ India)



#1 Information Agent
(DF King)



HR Excellence Best
L&D Strategy



CCA Silver Award,
10 yrs of customer
excellence



Living Wage
Employer



Group 5
#1 in customer
satisfaction (US)



CCA
Accredited

Community

Beyond its customer base, EQ extends its commitment to communities. Through its volunteering programme, colleagues are encouraged to dedicate time to causes that matter to them, contributing thousands of hours to charities, schools, and environmental projects each year. EQ also supports ShareGift, enabling UK shareholders to donate unwanted shares to charitable causes, a partnership which has raised millions of pounds over more than a decade. In 2024, we gifted over £60,000 to charities nominated through our Global Colleague Forum.

Colleague Volunteer Days

EQ encourages its employees to get involved in community engagement through volunteering. Employees are given volunteer days, which they can use to contribute to a number of good causes, including those that promote financial literacy and inclusion. This grassroots engagement boosts a deeper understanding of the financial challenges faced by under-represented communities, while also providing employees with the opportunity to give back in meaningful ways. Employees contributed almost 7,000 hours to good causes in 2024 using their EQ Volunteer Days. Within its India operation, colleagues have given their time and donations to rebuild two community schools, part of their EQ Cares community outreach initiative.

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

ShareGift Partnership

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



The Apprenticeship Levy

The Apprenticeship Levy is a tax that large UK businesses pay, and we receive it back to fund apprenticeship training. Any money that we don't use within two years is taken back by the UK Government, but we're allowed to 'gift' up to 25% of our unused Levy from the previous year to other organisations that don't have Levy funds, such as smaller businesses and charities.

As part of our strategic vision, we are committed to making a positive environmental and social impact on the world around us. To support this, we've launched our Levy gifting initiative. We've pledged an initial £50,000 of our unspent Levy to support charities and small businesses to both upskill their current people and to support new apprentices from ethnic minority groups, disadvantaged backgrounds and socially deprived areas, or someone who has any form of disability.

Our first 'gift' was to Innov8, an educational charity based in Suffolk, which supports young people aged 11 – 16 who are finding life a challenge. They may be excluded from school, experience learning difficulties, or they may be home schooled, and are predominantly from disadvantaged backgrounds.

Innov8's ambition for each of the young people they work with is to achieve one, or more, of these outcomes:

- Improved wellbeing
- To find, and learn a vocational skill
- Improved self-regulation
- A return to school
- To stay in school
- Go to college

The team at Innov8 provide young people with training in a whole host of different skills from joinery, mechanics and woodwork to music, cookery and photography. Plus, they also upskill their tutors with teaching qualifications. Our gifted Levy funds will fund four of their tutors to complete the Learning and skills teacher Level 5 apprenticeship.

We then committed £46,000 to fund two apprenticeship programmes to upskill essential workers at small organisations:

- A pharmacy in Birkenhead in the north of England, an area of high social deprivation, now has the money to fund one of their colleagues to complete the Pharmacy technician level 3 apprenticeship. With the new "Pharmacy first" plan for the NHS in 2024, this will provide much needed skills to deliver this service to their local community
- A preschool in Crowle in the north of England is now able to recruit a new apprentice to provide early years education in a local community



Purpose Coalition



In 2024 EQ partnered with The Purpose Coalition, joining leading British businesses like Co-op Group, the BBC and Centrica to break down barriers to opportunity in the UK. The Breaking Down Barriers Commission, part of the wider Purpose Coalition, brings together purpose-driven organisations across the UK to address deep-rooted inequalities and boost social mobility. Using a framework of 15 Purpose Goals that span key themes such as fair career progression, digital inclusion, good health and wellbeing, and equity, diversity and inclusion, the Commission helps organisations to share best practice, measure progress and identify areas for further growth. Subject matter experts from our People and Procurement teams have already joined the Commission's Social Impact Advisory Council – designed to help shape the new UK Labour government's thinking on social impact for business, which is expected to be an increasingly important part of the political agenda for the next few years.

“

We are proud to be working with The Purpose Coalition and its Breaking Down Barriers Commission, driving meaningful change and acting as a leading voice for social impact within the financial services sector. EQ is committed to caring for every customer and simplifying every transaction, whilst reducing our impact on the environment. One such change we have been engaged with for over a decade is the digitisation of share certificates and shareholder voting, to give all shareholders a voice so they can fully engage with the companies they are invested in. We look forward to continuing to work to break down barriers in the industry with renewed purpose.”

Adam Green, EQ's Chief Risk Officer

“

EQ's active role in The Purpose Coalition exemplifies the power of partnership in driving meaningful social impact within the financial services sector. It's a sector which contributes 12% to the UK's economic output so its potential to create real opportunity for individuals, families and communities across the country is vast. Our partnership will help develop EQ's existing initiatives on social impact and support the financial sector more broadly in making equality of opportunity central to its work.”

Rt Hon Justine Greening, Chair of the Purpose Coalition

“

The redefined political landscape has given us a chance to reconsider how business and government can better work together to tackle inequality. This administration has signalled its clear commitment to breaking down barriers and boosting opportunity, demonstrated recently by its establishment of the Office for Equality and Opportunity which will ensure that equality runs through everything it does. That aligns with the aims of the Breaking Down Barriers Commission, with valued members including EQ already collaborating closely on how they can best deliver opportunity.”

Nick Forbes CBE, Chair of the Breaking Down Barriers Commission

Ethical Marketplace



Data Privacy

EQ processes personal data for over 33 million shareholders, pensioners and customers across our services in over 128 countries. It is vital that our clients and customers trust us with their personal data. They must be confident in how we process, use and protect their personal data across all our operations and that we will always respect the rights they have over their data. EQ has a clear governance framework for how personal data should be processed and handled in line with the data protection principles of GDPR. All data subject rights requests are processed centrally by the Data Protection Office. When an error is made, these are all logged and corrective and preventative actions are taken to mitigate the risk of similar errors from re-occurring.

At EQ we will always prioritise privacy and will never sacrifice on protecting our customer's privacy. We consider privacy to be an asset, not a burden, and ensure privacy is always our default position in the design of all our systems and processes. We have a positive privacy culture across the globe regardless of jurisdictions and data protection legislation. All employees understand the importance of getting it right to ensure they are protecting personal data and the impact it can have if we get it wrong.

Employees are trained to handle personal information with the utmost care, ensuring transparency, security and compliance with all the applicable privacy laws and regulations. Data Protection training has been revolutionised using gamification. Our training module takes the user through the fictional world of Datopolis where they must defeat the 'Data Shadow', a villain who wants to take and use personal data for evil. The training ingrains the ethos of what must be considered and what actions must be taken to become a 'Data Guardian'. All employees, including contractors and temporary staff, must complete the data protection training within two weeks of commencing employment at EQ. They must also sign an accompanying Data Privacy and Security Attestation to demonstrate their understanding of and agreement to the correct ways of working.

We ensure we are fully transparent in how personal data is processed at all stages of the data life cycle. Along with actively managing any privacy risks, we look to understand where risks exist, ensure suitable controls are in place to mitigate those risks and proactively review risks and adjust those controls as the business changes and develops. We always advocate the ethical use of data whilst promoting and encouraging innovation of new products. This ensures EQ keeps progressing but is not sacrificing our stance of ensuring that data is always used in the way that our clients and customers would expect. In response to the increasing use of AI, EQ has developed an AI policy to ensure there is one consistent way for AI systems to be assessed for feasibility by the Data Office. If there is a business case to use AI, a full AI Risk and Impact Assessment is required to understand the potential impact of the use of AI on individuals. We must ensure systems are explainable and transparent, with 'Humans in the loop' for any key decisions, that they are free from bias and are regularly reviewed to ensure they continue to function as expected.

EQ processes personal data for over **33 million shareholders, pensioners and customers** across our services in over **128 countries.**

Information Security

EQ businesses handle sensitive data on behalf of our clients and customers, including personal data. The security of data and our systems is therefore at the core of our business mission and purpose. We have developed a mature and effective approach to security that is independently certified and is tested and inspected on behalf of our clients regularly.

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

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

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

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

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

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

Corruption

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

Here are the key elements of our approach:

1. Ethical Business Expectations

EQ and all suppliers and partners are expected to:

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

2. Whistleblowing Mechanisms

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

3. Supplier Due Diligence & Compliance

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

4. Alignment with Broader Ethical Standards

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

99%

of EQ employees completed ABC training in the previous 12 months

Whistleblowing

Policy and Process: EQ's Whistleblowing arrangements are governed by the Group Policy, which aims to ensure that customers, colleagues, shareholders and others are treated fairly at all times. Whistleblowing provides the means for colleagues to anonymously raise concerns, in the knowledge that they will be independently and objectively investigated and addressed.

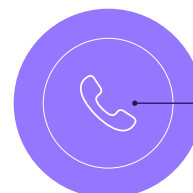
The Whistleblowing Policy and operational arrangements adhere to the principles of the UK's Public Interest Disclosure Act 1998, which is designed to reassure workers that they can safely raise concerns about serious wrongdoing.

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

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

Colleagues do not need to give their name and no attempt will be made to trace them if they raise a Whistleblowing case. Anonymity will be protected as far as legally possible. However, colleagues are encouraged to identify themselves so that they can be kept informed on what is happening and be safeguarded from any possible reprisal.

All concerns are treated seriously and will be independently investigated by Group Internal Audit (GIA). The outcomes of the investigation are reviewed by the Chair of the Audit Committee. Appropriate action will be taken when necessary.



24/7

service via a
Freefone number
in the UK & US
provided by
Safecall

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

- Victimisation of whistle-blowers will not be tolerated, even if the person raising the issue is subsequently found to be mistaken
- Provided staff follow policy and do not raise concerns maliciously, they will not be subject to any detriment by EQ
- In addition to EQ policy, in the UK the Public Interest Disclosure Act 1998 (PIDA) gives colleagues protection under the law (and similar protections exist in some other countries)

If colleagues have any concerns about repercussions as a result of reporting wrongdoing, they are encouraged to tell their manager or the Whistleblowing contacts without delay. If they believe that they have been victimised, they can raise a grievance through the EQ Grievance Policy.

EQ recognise that in exceptional circumstances, colleagues may feel more comfortable to report an issue completely outside of the organisation. In these cases, colleagues can contact the independent charity ‘Protect’, who are a recognised authority on Whistleblowing. Most countries also allow Whistleblowing direct to legally appointed organisations. These should generally be used when no action seems to have been taken after reporting through one of the other channels, or in cases of significant customer harm or EQ wrongdoing. Details of these are available in the relevant country sections of the Whistleblowing Policy.

Cases: Six Whistleblowing Cases were raised in 2024. Four of the cases were received via the Whistleblowing email account, and two were received via Safecall. All cases were investigated by Group Internal Audit and appropriate action was taken to address each issue.

Training: In 2024, 4,004 colleagues were enrolled to complete the Whistleblowing training. Of the enrolled population, 99.53% of colleagues completed the training.

99.53%
of colleagues
completed the
Whistleblowing
training

Whistleblowing Training			
2024	Total	4004	
	Compliant	3985	99.53%
	Non-complaint	19	0.47%

Digitisation

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

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

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

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

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

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

In 2024, we added a further 14 general insurance brands to the service, covering motor and home insurance. At its core, this work reflects a broader shift towards digital solutions that make essential services more accessible and responsive to real-life challenges. EQ is closing gaps in bereavement administration, demonstrating how thoughtful innovation can remove barriers at life's most difficult moments.

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

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

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

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

Governance



Governance & Risk Management

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

Accountability

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

Risk Management

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

Transparency

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

Fairness

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

Responsibility

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

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

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

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

First Line of Defence – Business Management & Colleagues

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

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

Second Line of Defence – Compliance & Risk

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

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

Third Line of Defence – Internal Audit

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

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

The objectives of GIA are to ensure that:

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

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

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

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

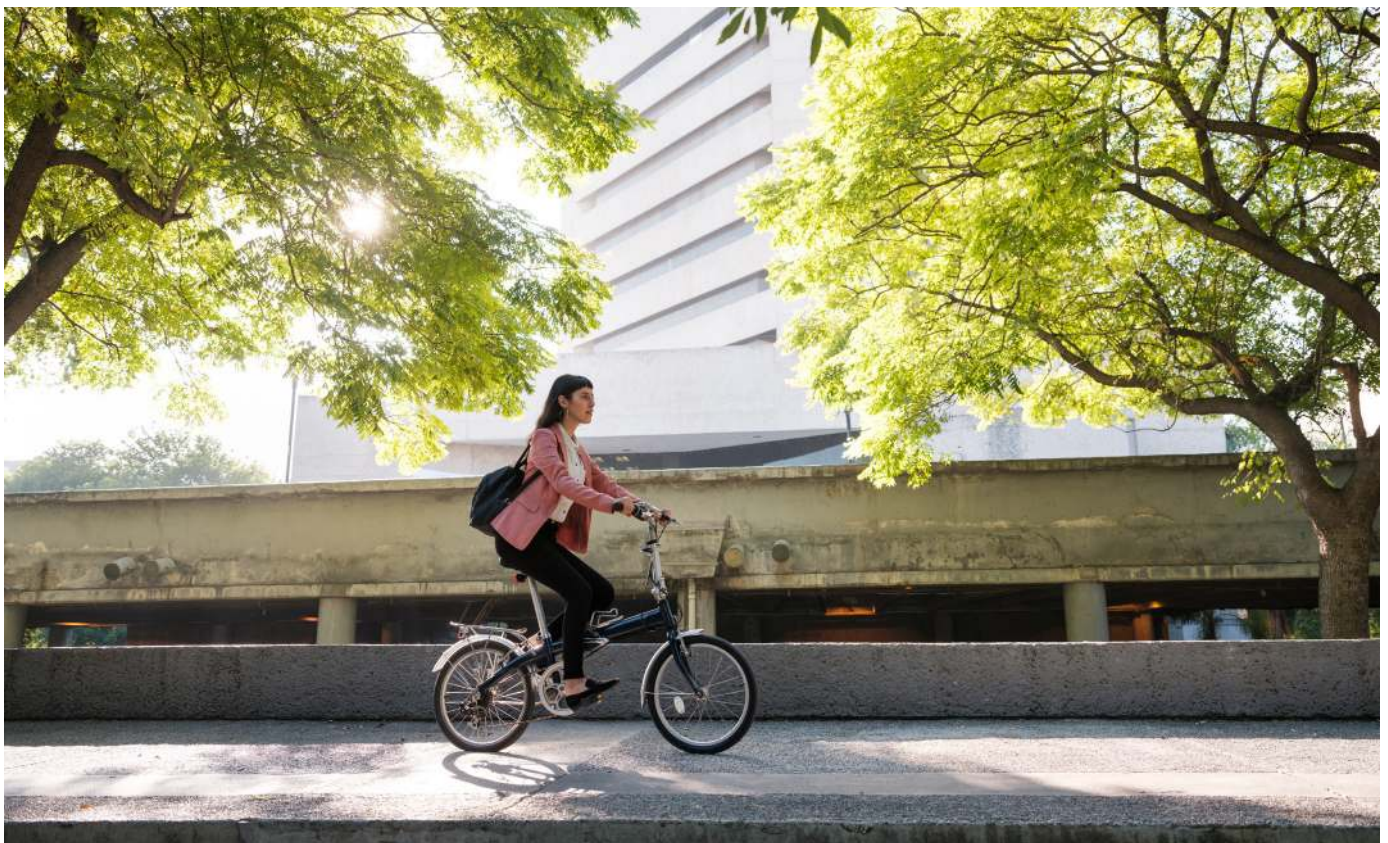
Embedding Sustainability in what we do – Integrating Social & Environmental Impacts into Decision-making

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

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

The questionnaire:

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



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

Group Procurement & Supplier Collaboration

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

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

Environment

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



Human Rights

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

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

Area	Metrics	Annual Target	As at May 2025	Notes
Sustainability	Percentage of targeted suppliers who have signed the EQ code of conduct	70%	78.50%	% of Tier 1,2 & 3 suppliers who have signed the EQ code of conduct
	Percentage of Buyers across all locations who have had training on sustainable procurement	80%	82%	% of Procurement Buyers who have completed Sustainable Procurement Training
	Percentage of targeted suppliers that have gone through a sustainability assessment	85%	94%	% of Tier 1, 2 & 3 suppliers who have completed the questionnaires and responded

ESG Related Assessments, Reporting & Publications

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

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

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



ESG Policies

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

