



Environmental, Social & Governance Policy

V1 - November 2024

LONDON | NEW YORK | NEW JERSEY | PARIS | FRANKFURT | MADRID | SINGAPORE | SYDNEY | MELBOURNE | BRISBANE | DUBAI

1. Purpose

The purpose of this Environmental Social Governance (ESG) Policy is to implement ESG considerations within the management and overall operations of GLAS. The policy aims to identify all opportunities to improve the performance of the organisation as measured against ESG criteria and mitigate any associated risks.

This policy shall provide a framework on how we apply ESG to how we run our business, how we engage with the communities in which we do business and how we pursue, evaluate and engage with our vendors.

2. Scope

This ESG Policy applies to all:

- GLAS employees across all locations
- Contractors, third parties and affiliates that have access to GLAS documents or other materials, or who are involved in, or are working on behalf of GLAS
- Workspaces both in the office, while working from home and while travelling

3. Policy Governance

GLAS shall regularly review and develop the ESG policy and shall engage in the following:

- Providing a group-wide ESG policy in collaboration with key stakeholders
- Overseeing ESG activities within GLAS in accordance with the policy and encouraging the continuing efforts of improvement
- Working closely with reporting teams to provide current status
- Evaluating and monitoring ESG factors to assess its impact
- Preparing regular impact reports on an annual basis

GLAS' ESG Executive Sponsor is Co-Chair and Group President, Mia Drennan.

4. ESG Focus Areas

The Directors have identified that the key areas in which GLAS should have an ESG policy are:

- Business Ethics
- Data Privacy & Cybersecurity
- Employee Engagement, Recruitment, and Retention
- Diversity & Inclusion

5. Business Ethics

Strong governance, risk management and ethical business practices are critical to GLAS' goals for long term value. Corporate governance provides guidelines to assist the board in maintaining its responsibilities and promotes effectiveness. Key factors include:

- Conducting all levels of our business with honesty and an ethical viewpoint
- Taking a zero-tolerance view on bribery and corruption. We are committed to acting professionally and with integrity in all business dealings, and to transacting only with those with similar values
- Reviewing product innovation to support positive governance outcomes
- The Board member responsible for ESG being required to consent to transactions relating to certain sensitive industries

6. Data Privacy & Cybersecurity

GLAS undertakes to deliver high standards of data privacy and cyber security to protect its clients and stakeholders. GLAS will:

- Ensure its employees receive high levels of quality training in respect to data privacy and cyber security
- Continue to invest in its cyber security threat detection and response programme
- Ensure its Vendor Management programme delivers high quality vendor relationships
- Maintain and build upon its ISO 27001 credentials
- Maintain insurance coverage which actively supports GLAS' and its clients in the event of a cyber security incident

7. Employee Engagement, Recruitment, and Retention

Wellness is at the centre of our working environment and aids with the growth of the organisation. Key factors include:

- Providing a safe and healthy working environment
- Actively seeking understanding of the impact of decisions on others and ensuring suitable feedback mechanisms are in place for all aspects of ESG: for example the endorsement and support of the GLAS Leadership Team
- Promoting community engagement
- Promoting employee engagement
- Measurement through regular employee satisfaction surveys
- Promoting responsible supply chain environment outcomes

8. Diversity & Inclusion

GLAS prides itself in providing a culture of respect for its staff and the outside community. We believe in diversity and inclusion and feel this is the catalyst for success and innovation. Key factors include:

- Promoting diversity and inclusion and ensuring that all staff are treated fairly, irrespective of gender, race, sexual orientation, nationality, religious beliefs and disability
- Actively seeking understanding the impact of decisions on others
- Providing transparency in our own business operations and in our approach to modern slavery