CORPORATE RESPONSIBILITY POLICY

Institutional Shareholder Services Inc. (“ISS”) has more than 30 years of experience working with institutional investors, companies, and other stakeholders globally providing corporate governance and responsible investment solutions that help investors manage environmental, social, and governance risks and seize investment opportunities. As a global company active in the financial markets, we are focused on building long-term growth and increasing the value of the services provided to our clients by placing quality and sustainability at the core of our organization, products, and business solutions. We take seriously our responsibility to our stakeholders, including our employees and the communities and environment in which we work and live, therefore we are committed to providing the necessary resources to enable the implementation of this policy.

Scope

This policy sets forth principles that apply globally across all ISS operations and subsidiaries. It also applies to ISS’ consideration of third-party initiatives to which ISS has aligned itself and that it may consider committing to in the future. The implementation of these principles may sometimes vary based on local market regulations or conditions.

People

At ISS, we respect diversity and develop a culture of equal opportunities and inclusion that values collaboration, integrity, and flexibility. We promote and work to ensure a work environment that is safe, healthy, respectful, and non-discriminatory. We see our differences as an opportunity to create a positive work environment. We encourage collaboration to respond to global challenges as our story is written by our people and we lead by example. ISS invests in human capital and fosters professional and personal development. We respect one another’s perspectives, seek ideas and inputs, and celebrate diversity and contributions. We are committed to conducting our business in compliance with all applicable workplace health and safety laws and regulations as well as providing opportunities to our employees to improve their work-life balance. We respect and support all internationally recognized human rights as articulated in the United Nations Universal Declaration of Human Rights, as well as the core standards of the ILO Declaration on Fundamental Principles and Rights at Work; and are committed to avoiding complicity in human rights abuses. We support and encourage the development of our people for a deeper understanding and responsiveness to ethical, social, and environmental issues as they relate to our business.

Environment

ISS recognizes a shared responsibility to improve sustainability beyond our products and services, as we aim to minimize our environmental footprint throughout our operations. We are committed to conducting our business in compliance with all applicable environmental laws and regulations. Our approach to sustainability seeks to minimize our environmental impact, especially by reducing CO₂
emissions and managing waste. We will increase energy from renewable sources in our own operations, reduce the carbon footprint of our data centers and business travel and improve waste reduction and recycling. We further strive to increase employee awareness regarding environmental issues encouraging collaboration and responsible behavior at the corporate and individual levels.

Responsible Business Operation

We live up to our values of Integrity, Collaboration, Empowerment, Flexibility, Diversity, and Clients, and our work is guided by the principle of “doing the right thing.” We deliver high-quality solutions to clients and ensure accurate research, analysis, and data services. Our business practices are guided by our General Code of Conduct and ensures that we comply with the highest standards of integrity with regard to bribery, corruption, conflicts of interest, antitrust, information and data security, and whistleblowing procedures. We treat our suppliers fairly and strive to create long-term partnerships. We are working on integrating sustainability principles into our procurement processes and encouraging our suppliers to comply with all legal social and environmental requirements.

Policy Governance

In order to promote the implementation of this policy, we have established supporting structures and responsibilities. Our Executive Leadership Team has set up a Corporate Responsibility (CR) Team that is in charge of developing and implementing a company-wide corporate sustainability strategy. Our CR Council, consisting of various members of the ISS Leadership team as well as the Global CR Manager who leads the CR Team, will coordinate, prioritize and approve ISS’ CR strategy and philosophy as well as review periodically this policy (at least on an annual basis).

Reporting Channel

The success of the application of this policy is a joint effort. Therefore, all employees are encouraged to provide feedback on new ideas as well as report deviations from it. The channel to report concerns relating to the implementation of this policy is via email to ISS_CORE@issgovernance.com. All internal communications made via this channel will be responded to in a timely manner.

This Policy was first approved by ISS’ CR Council, to be effective in March 2020. The Policy was firstly reviewed and further amended effective in October 2020. The Policy was secondly reviewed and further amended effective on October 11, 2022.

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