

Environmental, Social and Governance Policy

Acuity Knowledge Partners

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Document revision history

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1.0	8 Aug 2024	Human Resources Team	Initial release	CHRO

Environmental, Social and Governance Policy

Acuity Knowledge Partners (Acuity) is a leading provider of bespoke research, analytics, staffing and technology solutions to the financial services sector. Headquartered in London, Acuity has nearly two decades of transformation experience in servicing over 300 clients with a specialist workforce of over 2,500 analysts and delivery experts across its global delivery network. We provide our clients with unique assistance not only to innovate, implement transformation programmes and increase operational efficiency, but also to manage costs and improve their top lines.

As a company, we want to move beyond financial performance and are committed to making a positive impact on society and the environment, contributing to the wellbeing of communities and promoting sustainable development. We understand that environmental, social and governance (ESG) performance and management of ESG risks is a key consideration for all our stakeholders. Therefore, we believe the adoption of an ESG policy is an imperative and not just a reporting requirement. ESG is increasingly becoming an integral part of our functioning, going beyond the realms of reporting to becoming part of the company's culture.

Each Acuity employee and contractor must follow this policy and report any related concerns to Acuity's management.

This policy will be reviewed regularly by the Executive Committee to ensure that it remains appropriate for the needs of the company.

Scope and purpose

We are committed to ensuring that this policy serves as a framework for the organisation to demonstrate its commitment to sustainable and responsible business practices. It will guide decision-making processes, operations and the development of more detailed programmes and initiatives.

The policy also sets out Acuity's expectations, with each employee having the responsibility to adhere to and uphold the policy. The policy is applicable to all employees, distributors, partners and networks engaged in the company's operations.

Objectives

We are conscious of our responsibilities towards our customers, employees and all other stakeholders. We envision the integration of ESG considerations into our business operations, which would help generate superior long-term value and reduce risks the business faces.

- Ensure compliance with all relevant and applicable statutory rules and regulations
- Integrate ESG criteria into our operations and business decisions
- Allocate resources for training employees on the ESG policy and commitments
- Enhance the company's reputation and brand value to attract and retain employees and customers
- Mitigate legal and regulatory risks
- Regularly review ESG and associated policies, considering new and emerging risks, and stakeholder concerns
- Demonstrate accountability to addressing ESG-related concerns of all stakeholders
- Report the impact of our business activities on the environment and society

Focus areas

We committed to the Science Based Targets initiative's (SBTi's) Corporate Net-Zero Standard in September 2022 and to setting a robust emission-reduction target at the pace and scale required by climate science before September 2024 based on our comprehensive roadmap established using 2019 as the base year. We have joined the Business Ambition for 1.5°C campaign – the world's largest and fastest-growing group of companies aligning with 1.5°C target by helping to halve global emissions by 2030. Our company is showcased by the SBTi, the Global Compact and our partner We Mean Business.

We recognise the importance of conducting assessments to identify key areas that are material and that play a fundamental role in determining the ESG issues critical to the company.

We have conducted a materiality assessment and identified topics by means of peer benchmarking, Sustainability Accounting Standards Board (SASB) regulation and consultation with internal and external stakeholders.

Environmental commitments

As a company, we take the initiative towards building a culture of sustainability, ensuring a higher chance of boosting customer engagement and accessing capital. We will work closely with our suppliers to reduce waste, improve efficiency and reduce carbon footprint, and engage with them to understand their commitment towards upholding human rights and fair labour practices. We started to measure and disclose our greenhouse gas (GHG) emissions in 2020, with 2019 as the base year. Our strategy is to respond to the needs of climate change and transition to a low-carbon economy. We have a decarbonisation plan in place to reduce our carbon footprint by implementing initiatives to monitor and reduce our energy consumption.

Our environmental performance will be evaluated based on

- Energy management
- GHG emissions
- Water and waste management

Social commitments

Under this pillar, the focus is on organisational policies and practices relating to human rights, business ethics, supply-chain management, diversity and inclusion and social consequences due to company activities. This specialised approach helps us to provide guidance for developing plans that address local needs and priorities and, in doing so, improve the wellbeing and standard of living in the communities impacted. Guided by our board-governed Corporate Social Responsibility (CSR) Policy, we continue to create value for the communities we operate in, through well-structured programmes and interventions focusing on the three Es – education, environment and employability. To increase the significance of the social pillar, we will specifically focus on the following:

- Attracting and retaining talent
- Health, safety and wellbeing
- Diversity, equity and inclusion (DEI)
- Human rights
- Employee engagement, training and upskilling
- Corporate social responsibility
- Supplier diversity

Governance commitments

Corporate governance is the process of ensuring balance between demands of a company's stakeholders (including shareholders, employees, customers, suppliers and financiers) and the community. We aim to develop and implement a robust and effective corporate governance framework, adhering to applicable national regulatory requirements and in line with leading global guidance on good corporate governance. We have proactively upheld good governance practices and constantly strive to enhance our standards by improving the following:

- Corporate governance and business ethics
- Client satisfaction
- Risk management
- Data security
- Technology and innovation

- Supply-chain management

Policies that guide our ESG commitments

We have a number of policies in place (listed in Appendix 1) to provide the necessary guidance to our employees, suppliers, distributors and third parties who work with us, enabling us to meet our ESG commitments.

Related policies and procedures

This policy should be read in conjunction with the following policies and procedures:

1. Code of Business Conduct
2. Anti-Bribery and Anti-Corruption Policy
3. Compliance Manual
4. Environmental Sustainability Policy
5. Carbon Management Policy
6. Information Security Policy
7. Cybersecurity Policy
8. Corporate Social Responsibility Policy
9. Supplier Diversity Policy
10. Modern Slavery and Human Trafficking Policy
11. Diversity, Equity and Inclusion Policy
12. Health and Safety Policy
13. Equal Opportunity Policy for Persons with Disabilities
14. Reasonable Accommodation Policy for Persons with Disabilities
15. Gender Affirmation Policy
16. Labour Practices Charter

Administration of the policy

The Chief Human Resources Officer, together with the Net-Zero Committee, will review the ESG Policy and oversee its implementation.

Appendix 1

Policies that help us meet our ESG commitments

Sr. No.	Name of the policy	A brief description
1	Code of Business Conduct	This is a statement of the fundamental principles and key policies that govern the conduct of our business. It confirms that an essential aspect of Acuity's success is our collective commitment to operating in an ethical and lawful manner to maintain the integrity of our business.
2	Anti-Bribery and Anti-Corruption Policy	It is Acuity's policy to comply with all applicable anti-bribery, anti-corruption and anti-facilitation of tax evasion laws, including but not limited to the US Foreign Corrupt Practices Act (FCPA), the UK Bribery Act (UKBA), the Prevention of Corruption Act (PCA) and the UK Criminal Finances Act 2017 (CFA), in the regions that Acuity operates in and to accurately reflect all transactions in Acuity's books and records.
3	Compliance Manual	This summarises the general compliance policies and procedures that Acuity employees need to comply with in carrying out the company's business activities, to ensure that Acuity complies with its legal, regulatory and contractual obligations.
4	Environmental Sustainability Policy	Acuity is aware of the need for environmental conservation and shall work towards minimising activities that could be impeding environmental sustainability. We will encourage our employees to conserve resources at the workplace and in the communities in which we operate. In addition, we will monitor and regulate our resource consumption by integrating green practices into our operating system.
5	Carbon Management Policy	This supports our Environmental Sustainability Policy and aims to reduce the negative impact that our business activity has on the environment through GHG emissions.
6	Information Security Policy	This aims to ensure that appropriate safeguards are in place to ensure the confidentiality, integrity and availability of information assets by protecting such assets from unauthorised access, modification, destruction or disclosure. It states management's commitment to maintaining a secure information processing environment and to protecting information from all threats, whether internal or external, deliberate or accidental.
7	Cybersecurity Policy	This is based on the industry standard NIST Cybersecurity Framework. It is divided into five functional areas, based on the framework. Acuity's policies that comment on cybersecurity-related processes and their implementation are mapped to the respective area.
8	Corporate Social Responsibility Policy	This focuses on our responsibility to develop the communities in which we operate. We understand that a business can grow through a healthy society and an educated workforce, and that businesses should contribute to the empowerment of communities. Acuity is a responsible corporate and believes that sustainability of its communities is essential for ensuring business sustainability.
9	Supplier Diversity Policy	Acuity's commitment to supplier diversity is not philanthropic; nor does it contradict the application of existing purchasing goals, policies or procedures. The award of opportunities to suppliers will be based on criteria established as part of the sourcing request or other criteria that may arise from time to time, including, but not limited, to their relative competitiveness, the value of their offerings and their demonstrated performance.
10	Modern Slavery and Human Trafficking Policy	Acuity recognises that modern slavery and human trafficking are global problems, and this statement sets out the steps taken to prevent such practices in any part of Acuity's business or supply chains.
11	Diversity, Equity and Inclusion Policy	This aims to outline our commitment to ensuring that our workplace is free from discrimination. It also sets out Acuity's expectations, with each employee having the responsibility to adhere to and uphold the policy.

Sr. No.	Name of the policy	A brief description
12	Health and Safety Policy	Acuity considers the health and safety of all its employees as one of its primary concerns. This handbook provides practical guidance and basic information on workplace safety and responses to office emergencies and natural threats. In the event of an unforeseen incident/emergency, we follow the advice of local authorities.
13	Equal Opportunity Policy for Persons with Disabilities	This aims to foster a diverse and inclusive workforce in line with the Rights of Persons with Disabilities Act 2016. It ensures equal employment opportunities for persons with disabilities (PwDs) in all areas, including hiring, training and career advancement. Key objectives are to provide necessary facilities for PwDs, identify suitable job roles and ensure workplace accessibility.
14	Reasonable Accommodation Policy for Persons with Disabilities	This aims to support the inclusion of persons with disabilities (PwDs) by providing necessary accommodation in the workplace. It ensures that PwDs have equal employment opportunities and covers all employees and job candidates with disabilities, addressing all aspects of employment from recruitment to career advancement.
15	Gender Affirmation Policy	We are committed to fostering an inclusive and diverse workplace, providing equal employment opportunities to all qualified individuals without discrimination. The company emphasises respect, trust and collaboration, enabling employees to be authentic and excel in their careers. Acuity hires and promotes based on job-related qualifications and prohibits discrimination and harassment on any ground, such as gender, race or age. The policy specifically supports transgender and non-binary employees through gender-affirmation guidelines, ensuring their inclusion and sense of belonging.
16	Labour Practices Charter	Acuity is compliant with local statutory laws, and our policies are compiled in line with the labour laws in the different geographies that we operate in.

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About Acuity Knowledge Partners

Acuity Knowledge Partners (Acuity) is a leading provider of bespoke research, analytics and technology solutions to the financial services sector, including asset managers, corporate and investment banks, private equity and venture capital firms, hedge funds and consulting firms. Its global network of over 6,000 analysts and industry experts, combined with proprietary technology, supports more than 500 financial institutions and consulting companies to operate more efficiently and unlock their human capital, driving revenue higher and transforming operations. Acuity is headquartered in London and operates from 10 locations worldwide.

Acuity was established as a separate business from Moody's Corporation in 2019, following its acquisition by Equistone Partners Europe (Equistone). In January 2023, funds advised by global private equity firm Permira acquired a majority stake in the business from Equistone, which remains invested as a minority shareholder.

For more information, visit www.acuitykp.com