

2024  
**Sustainability Report**





## Coverage Statement

**This Sustainability Report communicates the progress of Ethixbase UK Limited and its associated group entities (operating as and hereinafter “Ethixbase360”) from April 1, 2023 to March 31, 2024.**

This report reflects not only our commitment to global best practices but also our dedication to transparency as we, like many other organisations, work to improve the impact that we have on our people, communities, and our planet.

In 2024, Ethixbase360 is electing to Communicate our Progress using the preferred UNGC Digital Questionnaire. This selection facilitates the ability to compare performance against peers through access to what we hope will become one of the largest sources of free, public and comparable corporate sustainability data.

We recognise that while we continue to make great strides in ESG and Sustainability in our business, we like many others, have more work to do and are committed to continue to refine our approach as best practices continue to evolve.

# Contents



## A Message from

Peter

At Ethixbase360 we recognise the critical importance of the United Nations Global Compact (UNGC) initiative and its principles in fostering a more sustainable and responsible global business environment. Our ongoing commitment to the UNGC reflects our belief in the fundamental goals of the initiative and our dedication to upholding these in all aspects of our operations and value chain, while empowering our clients to do the same.

Driving transparency and elevating ethical standards throughout value chains is at the heart of our business ethos as we work with clients to deliver better business outcomes through efficient and impactful third-party risk management. Our vision is to support businesses globally to operate and govern ethically – ensuring that human rights and the environment are respected for the benefit of the global community. We firmly believe that ethical business conduct is key to sustainable development and have a zero-tolerance policy towards corruption. This commitment extends beyond our own operations and encompasses our value chain where we actively promote anti-corruption measures, human and labour rights and environmental stewardship both in our operations and through our products and services.



In FY2024 we were proud to expand our global volunteering program, deploy a new supplier code of conduct and roll out training for all employees and contractors on key topics such as anti-corruption, conflicts of interest and forced labour. We have also made great strides in identifying and reducing our Scope 3 emissions. This foundational work sets us up for setting future improvement targets by working more closely with our third parties and aligns with our ongoing goals to use renewable energy sources, where possible, and offset business travel emissions.

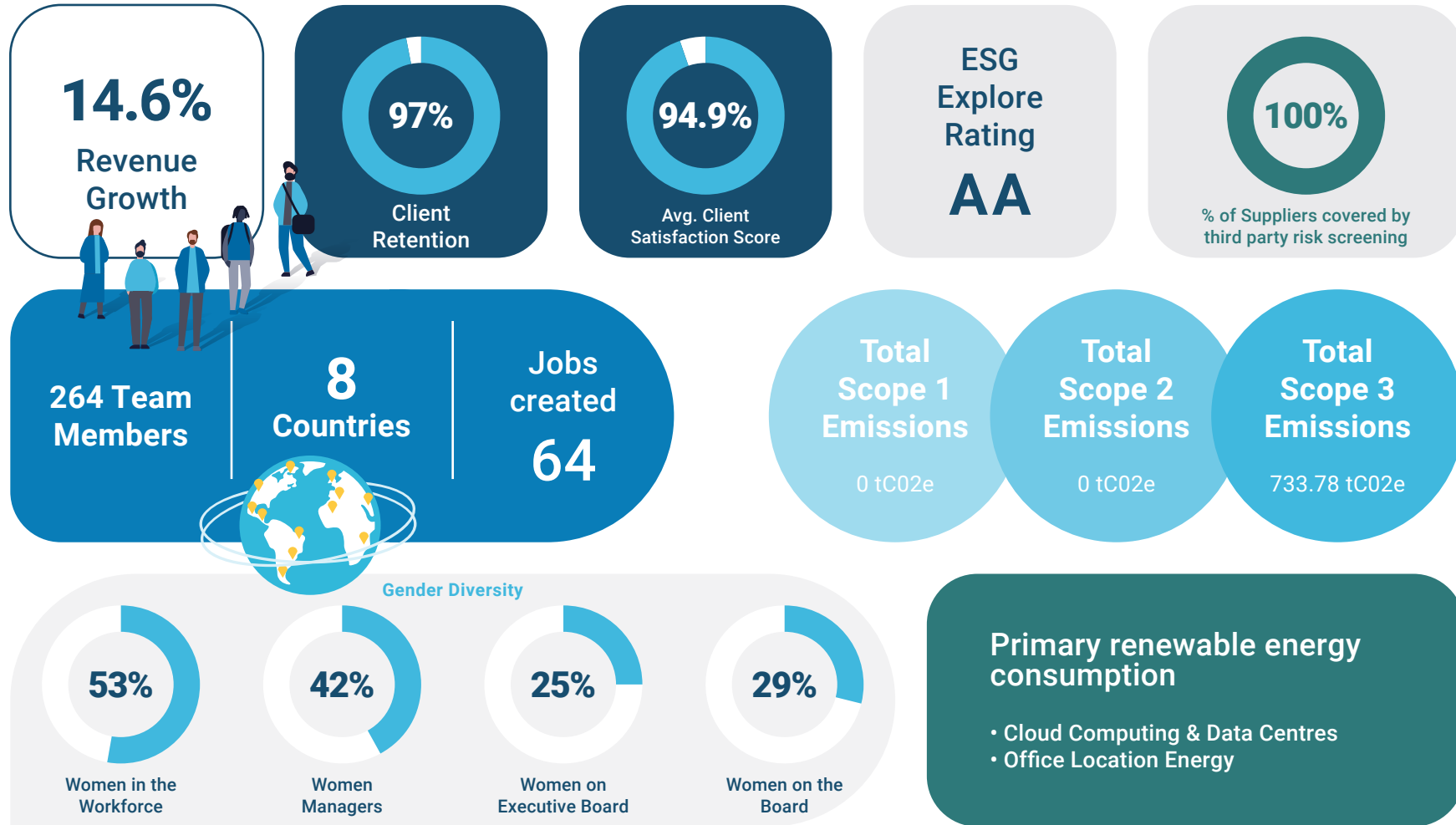
We are proud of what we have accomplished but recognise that there is more to do. Transparency is key to our approach, which is why we fully support the UNGC's move towards a more granular and comparative publicly available questionnaire. We believe that greater transparency leads to better accountability and drives positive change.

We remain committed to continuously enhancing our efforts and assisting our clients in fostering their own sustainable value chains.

**Peter Sweetbaum**, Chief Executive Officer

# FY2024 Highlights in Metrics

1 April 2023 - 31 March 2024





## Mission & Vision

Our Mission is to empower our clients to be catalysts of ethical change, while delivering better business outcomes through efficient and impactful third-party risk management which drives transparency and elevates ethical standards.

Our Vision is to support businesses globally to operate and govern ethically, with integrity and transparency – ensuring human rights and the environment are respected for the benefit of the global community.

## Core Values

Driving our culture, connections and behaviours



### Accountability

We are **accountable** to ourselves, our clients, our team and our world. **Our actions define us.** We own our commitments, while **remaining steadfast in our ethical principles.**



### Empowerment

We **trust** in and **empower our people** to ignite creativity, initiative and decision-making to **drive innovation** and **exceed client expectations.**



### Collaboration

**Collaboration, respect** and **teamwork** are central to our spirit of **shared responsibility** and the **celebration of collective achievement.**



### Diversity

**Individuality, vulnerability** and **diversity** are **encouraged and celebrated.** Open communication inspires courageous action and **ensures everyone feels valued and included.**

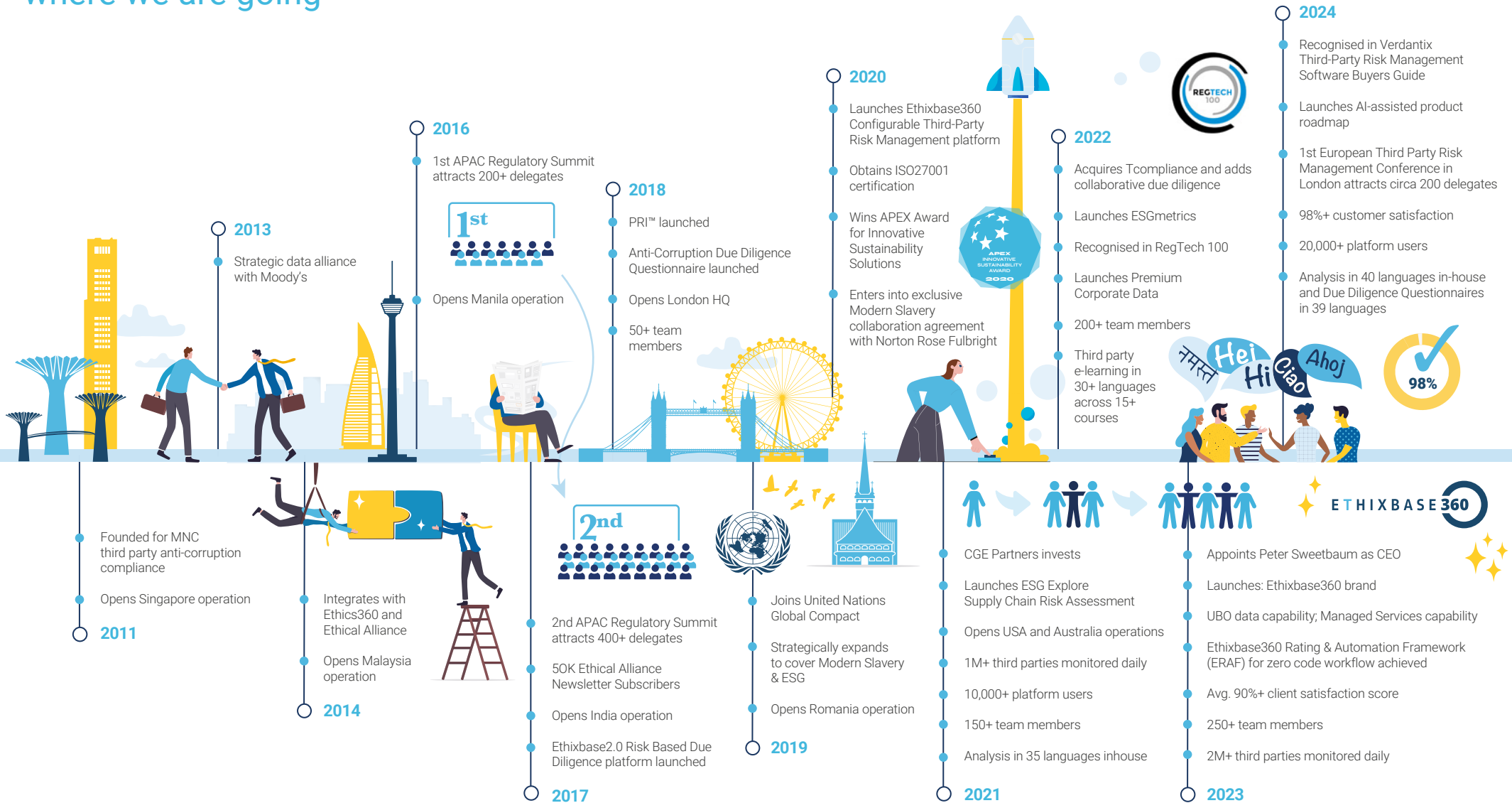


### Partnership & Client Centricity

We build **enduring partnerships** with our clients by **actively listening** to, delivering and **exceeding their expectations** to **power positive change.**

# Our History

Where we have been powers where we are going



# Ethixbase360 Stakeholders

## Our Value Chain & Impact



At Ethixbase360 we recognise our role, responsibility and influence in having a positive impact across our global value chain.

From our employees and contractors, to our partners and suppliers we can help to achieve positive outcomes for our customers, local communities and ultimately our planet.





# Key FY2024 Stakeholder Initiatives

## Corporate Volunteering Program

As part of our commitment to giving back to the community we launched a company sponsored volunteering program aimed at encouraging our team members to volunteer their time and skills for a good cause in their community.

At Ethixbase360 we firmly believe in the power of collective action and the positive impact it can have on society. By volunteering we not only contribute to the betterment of our community but also foster personal growth and development.

Volunteering is a wonderful opportunity to make a difference to the lives of others, gain new perspectives, and build meaningful connections outside of the workplace.

Many of our employees may already volunteer in their spare time, to aid in this process and to ensure employee's have time to give back to their local community we have offered staff the opportunity to use a paid workday to volunteer (increased from a half day FY2023.)



Simon Forey



Angela Duffett



Dominika Kopinski



Jessie Ormerod

## New Supplier Code of Conduct

In June 2023 a new Supplier Code of Conduct was published to highlight Ethixbase360's commitment to ethical business standards and the expectation of the same from our suppliers and business partners.

The Ethixbase360 Supplier Code of Conduct summarizes the ethical principles of Ethixbase360 and builds out on our commitment to the United Nations Global Compact and applicable laws designed to combat modern slavery in supply chains. The code describes the conduct Ethixbase360 expects from its contractors, consultants, suppliers, vendors, agents, and all other third-party companies that comprise Ethixbase360's value chain. Ethixbase360 suppliers must implement the requirements of the code in their own operations as well as within their own value chains.



Our supplier code of conduct can be found [here](#).



### The Supplier Code of Conduct covers:

- Compliance with laws, rules and regulations
- Bribery and corruption
- Human Rights
- Export controls and trade sanctions
- Labour standards
  - Freely chosen employment
  - Child labour
  - Working hours
  - Wages and benefits
  - Humane treatment
  - Workplace equality
  - Freedom of association
  - Health and safety
- Adverse Environmental effects on the community, environment and natural resources
- Responsibility for company resources
- Conflicts of interest
- Management system(s)
- Raising Concerns





## Employee and Contractor Training

In FY2024 Ethixbase360 rolled out training to all employees and contractors on the following topics to raise awareness of and enforce the importance of, the following areas.

- Anti-Corruption
- Conflicts of Interest
- Forced Labour & Human Trafficking: Risk & Regulation
- Sexual Harassment Prevention Training
- Toxic Transactions: Bribery, Extortion, and the High Price of Bad Business

In FY2025 and beyond we will continue to enhance our team members knowledge and understanding of key sustainability and governance topics with the intention to roll out further Diversity, Equity and Inclusion and Anti-Trust and Competition eLearning and continue to refresh knowledge on a regular basis.



## Board of Directors

**The Shareholder Board is the ultimate responsible forum for ensuring governance and retaining fiduciary responsibility for the shareholders of the Ethisbase360 group.**

The Shareholder Board review and ratify the strategy for the Ethisbase360 Group proposed by the Executive Board and approve the annual budget; annual audited accounts; and establish a Remuneration and Audit Committee. The Shareholder Board is responsible for the capital and funding requirements of the Group. A monthly Board Pack is produced by the Executive Board and minutes and actions maintained by the Investor. The board of directors is comprised of 7 executive and non-executive directors.



### Executive Board

The Executive Board (Exec Board) is composed of 9 C-Suite executives with representatives from Product & Technology, Marketing, Sales, Finance, Research and People & Talent. The Executive Board is the most senior executive forum within the Group and is responsible for defining and ensuring the execution of the approved Ethisbase360 Group strategy; developing and delivering the approved Group Business Plan and providing commercial, financial, operational & technical leadership of the Company. The Exec Board is responsible for the welfare of employees and ensuring Ethisbase360 remains an employer of choice for Ethisbase360 team members. The Exec Board is responsible for Governance, Risk & Compliance and establishing an appropriate GRC forum which the Chairman is invited to. The CEO manages a weekly agenda for each Exec Board meeting with pre and post Shareholder Board reviews.



### Operating Board

The Operating Board (Op Board) is responsible for the successful day to day operations of the Group and ensuring successful execution of the Business Plan. The Op Board members represent the key functional areas of the business and are individually and collectively responsible for ensuring highly effective coordination across the groups they represent the Op Board members are responsible for the welfare of, and communication with, their functional teams.

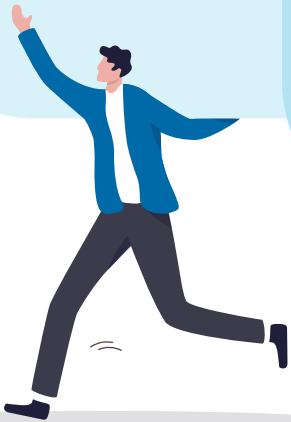
# Governance Model

## Committees



### Remuneration Committee

The Remcom is the forum for establishing appropriate remuneration and incentives for the Ethixbase360 group executives and employees.



### Audit Committee

The Audit Committee is the Governance forum ensuring the financial governance, processes and controls are established and operating properly; that accounting and regulatory requirements are met and that audited accounts are produced and ratified on an annual basis.



### Commercial Approval Forum

The purpose of the Commercial Approval Forum ("the CAF") is to provide active and unified support for a commercial transaction and to help the Sales team to proceed with the agreed optimal approach to winning properly structured and priced deals with full functional support.



### ESG Committee

The purpose of the ESG Committee is to oversee and guide the organisation's Environmental, Social, and Governance (ESG) initiatives and performance. The committee is responsible for ensuring that the organisation upholds its commitment to sustainability, social responsibility, and good corporate governance practices.



### Values Committee

Our Values Committee brings together colleagues from 6 countries and 8 departments to explore different perspectives and collate feedback to set values that define our business and prescribe a positive and engaging culture. The output of the Values Committee was delivered to the business in June 2024 which was delivered alongside our reshaped Vision, Mission and North Star. The Committee is tasked with ensuring the business is living and breathing our values on an ongoing basis as they are embedded throughout the organisation.





# Ethibase360's Contribution to the UNGC Sustainable Development Goals (SDGs)



## 3 GOOD HEALTH AND WELL-BEING



### Goal 3

#### Ensure healthy lives and promote well-being for all at all ages

3.8 Achieve universal health coverage, including financial risk protection, access to quality essential health-care services and access to safe, effective, quality and affordable essential medicines and vaccines for all.

### Ethibase360 Contribution During Reporting Period

As an employer across multiple countries Ethibase360 is committed to the physical and mental wellbeing of our team members. Health cover is supplied to employees across the United Kingdom, United States, Singapore, Malaysia, Romania and the Philippines. At present there is no healthcare supplied to team members in Australia due to the country's public health standards. Benefits are reviewed annually to ensure they are aligned with standards.

## 4 QUALITY EDUCATION



### Goal 4

#### Ensure inclusive and equitable quality education and promote lifelong learning opportunities for all

4.7 By 2030, ensure that all learners acquire the knowledge and skills needed to promote sustainable development, including, among others, through education for sustainable development and sustainable lifestyles, human rights, gender equality, promotion of a culture of peace and non violence, global citizenship and appreciation of cultural diversity and of culture's contribution to sustainable development.

### Ethibase360 Contribution During Reporting Period

At Ethibase360 Engagement is core to our approach to driving sustainability standards not only with our employees but also with clients and their third parties.

#### Inclusive and equitable education and learning opportunities for employees and contractors.

All employees and contractors are trained on topics such as anti-bribery and corruption, conflicts of interest, forced labour and sexual harassment. Additionally discretionary training budgets are allocated to departmental heads to fund employee education opportunities.

#### Sustainability focused training for clients and their third parties

Ethibase360 offers over 15 eLearning courses in up to 34 languages dependent on the course, to clients, their employees and third parties. These courses help to promote awareness of key sustainability topics across primarily governance and social issues though we do plan to expand these course offerings into the environmental sphere in our upcoming roadmap.





# Ethibase360's Contribution to the UNGC Sustainable Development Goals (SDGs)



## 5 GENDER EQUALITY



### Goal 5

#### Achieve gender equality and empower all women and girls

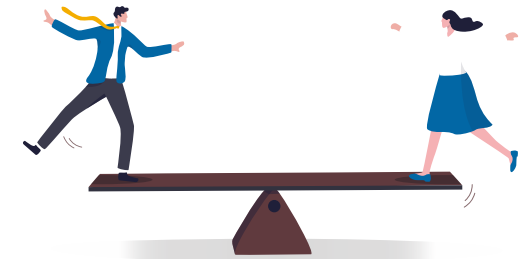
5.5 Ensure women's full and effective participation and equal opportunities for leadership at all levels of decision-making in political, economic and public life.

### Ethibase360 Contribution During Reporting Period

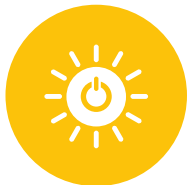
Ethibase360 has internal targets measured quarterly regarding our male/female team member split alongside our representation of women in Managerial and Executive positions. Over the course of the next financial year we will be weaving gender equality in to our recruitment process ensuring we are allowing fair representation from all diverse backgrounds.

At present we are more than 50% female however have strides to make in reflecting our goals in leadership positions.

- 53% women in workforce
- 43% women in managerial positions
- 25% women on the executive board
- 28% women on the board



## 7 AFFORDABLE AND CLEAN ENERGY



### Goal 7

#### Ensure access to affordable, reliable, sustainable and modern energy for all

7.2 By 2030, increase substantially the share of renewable energy in the global energy mix.

### Ethibase360 Contribution During Reporting Period

Where Ethibase360 has the ability to select energy sources through our own operations renewable energy sources are prioritized - such as our head office location in London, United Kingdom and energy sources used for our data centres via Amazon Web Services (AWS) which is currently reported as being powered by 90% renewable sources.

We will continue to prioritize the use of renewable energy sources wherever possible while recognizing that with a majority of remote workers we are unable to dictate renewable energy use in all locations.





# Ethibase360's Contribution to the UNGC Sustainable Development Goals (SDGs)



## 8 DECENT WORK AND ECONOMIC GROWTH



### Goal 8

#### Decent work and economic growth

8.5 By 2030, achieve full and productive employment and decent work for all women and men, including for young people and persons with disabilities, and equal pay for work of equal value.

8.7 Take immediate and effective measures to eradicate forced labour, end modern slavery and human trafficking and secure the prohibition and elimination of the worst forms of child labour, including recruitment and use of child soldiers, and by 2025 end child labour in all its forms.



### Ethibase360 Contribution During Reporting Period

During the reporting period Ethibase360 created 64 new jobs across our 8 country operations and achieved 53% women in the workforce. We have also ensured safe working conditions for our team members and promoted requirements for human rights, equality and safety in our supply chain via our Supplier Code of Conduct and amongst our clients and their third parties via our engagement solutions.

### Ethibase360 Contribution During Reporting Period

Ethibase360 supports a global customer base with Modern Slavery Supply Chain Risk Assessment, human rights enhanced due diligence, supplier certification and third party forced labour and human trafficking eLearning. Our Modern Slavery Supply Chain Risk Assessment Questionnaire has been built to assist clients to address their reporting obligations to identify, manage and report on modern slavery within their supply chains. Initially conceived to address mandatory reporting under the Australian Modern Slavery Act the solution has since been updated specifically in response to the German Act on Corporate Due Diligence Obligations in Supply Chains and the Canadian Fighting Against Forced Labour and Child Labour in Supply Chains Act to support organisations with their obligations in multiple jurisdictions. We will continue to work with our partner to update the solution to facilitate Modern Slavery and Human Rights supply chain risk assessment, due diligence and reporting obligations across multiple jurisdictions and plan programs to respond to the risks identified.

You can view more information about our solutions for Modern Slavery and Forced Labour [here](#).





# Ethixbase360's Contribution to the UNGC Sustainable Development Goals (SDGs)



## 12 RESPONSIBLE CONSUMPTION AND PRODUCTION



### Goal 12

#### Ensure sustainable consumption and production patterns

12.6 Encourage companies, especially large and transnational companies, to adopt sustainable practices and to integrate sustainability information into their reporting cycle

### Ethixbase360 Contribution During Reporting Period

Ethixbase360 facilitates value chain transparency for companies of all sizes by working with over 3500 clients globally to identify, manage and report on anti-corruption, modern slavery and human rights and ESG risk and resilience factors in their third party networks via our Third Party Risk Management platform Ethixbase360. Ethixbase360's vision is to support businesses globally to operate and govern ethically, with integrity and transparency. Empowering our clients to be catalysts of ethical change in their own value chains through efficient and impactful third party risk management which drives transparency and elevates ethical standards.

More information regarding our ESG capabilities to assess risk and resilience in global supply chains can be found [here](#).

## 16 PEACE, JUSTICE AND STRONG INSTITUTIONS



### Goal 16

#### Promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels

16.5 Substantially reduce corruption and bribery in all their forms

### Ethixbase360 Contribution During Reporting Period

Ethixbase360 facilitates value chain transparency with a proprietary methodology that allows our clients to Explore Risk, Enhance Insight and Engage Directly to elevate standards. We are committed to eliminating corruption from the global value chains of our clients and further assist small and medium enterprises to take their due diligence credentials into their own hands, using their stance on anti-corruption and evidence of their ethical business standards as a unique differentiator to drive business and differentiate them from their competition via Tcertification™.

More information regarding our capabilities for third party risk management for anti-corruption can be found [here](#).





# Ethibase360's Contribution to the UNGC Sustainable Development Goals (SDGs)



## 17 PARTNERSHIPS FOR THE GOALS



### Goal 17

#### Strengthen the means of implementation and revitalize the global partnership for sustainable development

17.6 Enhance the Global Partnership for Sustainable Development, complemented by multi-stakeholder partnerships that mobilize and share knowledge, expertise, technology and financial resources, to support the achievement of the Sustainable Development Goals in all countries, in particular developing countries.

### Ethibase360 Contribution During Reporting Period

Ethibase360 partners with our clients, their third parties, our employees and team members from across the globe to drive sustainable development throughout global value chains. Our clients have immense power to create positive change in their value chains through effective and efficient third party risk management that prioritizes business ethics and elevates standards and transparency for the benefit of the global community.



# 2024 UNGC Communication of Progress (CoP)

Ethixbase360's responses to the CoP questionnaire have been included in full within our Sustainability report to demonstrate our commitment to transparency and to facilitate clear and comparable reporting. These responses were submitted to the UNGC via their digital portal in July 2024 covering the reporting period 01 April 2023 – 31 March 2024.



## Governance G1

Does the board/highest governance body or most senior executive of the company:

✓	Issue an annual statement about the relevance of sustainable development to the company
✓	Issue an annual statement that addresses impacts on both people and the environment
✓	Issue an annual statement highlighting a zero tolerance for corruption
✓	Sign off on organisational sustainability targets
✓	Supervise Environmental, Social and Governance reporting
✓	Regularly review potential risks related to the business model

## Governance G2

Does the company have a publicly stated commitment regarding the following sustainability topics?

	No, this is not a current priority	No, but we plan to within the next two years	Yes, focused on our own operations	Yes, focused on our own operations and suppliers	Yes, and focused on our own operations and the value chain <small>(e.g., suppliers, consumers, communities, other business relationships)</small>
Human Rights					✓
Labour Rights / Decent Work					✓
Environment					✓
Anti-Corruption					✓

Ethixbase360’s corporate mission is to increase transparency throughout global value chains across our key risk areas of Anti-Corruption, Human Rights and ESG. Along with publicly available policy and commitment information available via our Ethixbase360 website - such as our Code of Conduct, Supplier Code of Conduct, Diversity Statement and ESG Commitments - Ethixbase360 drives best practices in these areas through the provision and sale of our services to a globally diverse client and third-party base.

Does the company have a code of conduct in place regarding each of the following sustainability topics?

	No, this is not a current priority	No, but we plan to within the next two years	Yes, focused on employees	Yes, focused on employees and suppliers	Yes, focused on own operations and the value chain <small>(e.g., suppliers, consumers, communities, other business relationships)</small>
Human Rights				✓	
Labour Rights / Decent Work				✓	
Environment				✓	
Anti-Corruption				✓	

Ethixbase360 is committed to the highest standards of ethical business and expects the same from our employees, contractors, suppliers and other business partners. Our Code of Conduct and Supplier Code of Conduct are publicly available via our website and cover key topics across anti-corruption, trade sanctions, human rights, labour rights, workplace equality and environmental concerns, amongst other topics. Every employee and contractor is expected to sign onto to our Code of Conduct and new suppliers are provided with the Supplier Code of Conduct to clearly communicate our expectations. In addition to our code of conduct we also provide appropriate staff awareness training to enforce our commitment to ethical business and our expectation of employees and contractors.

**These courses include;**

- Anti-Corruption
- Conflicts of Interest
- Forced Labour & Human Trafficking: Risk & Regulation
- Sexual Harassment Prevention
- Toxic Transactions: Bribery, Extortion, and the High Price of Bad Business

**Our publicly available Codes of Conduct are here:**

[Supplier Code of Conduct](#)  
[Code of Conduct](#)

# Governance

## G4

Has the company appointed an individual or group responsible for each of the following sustainability topics?

	No one is specifically responsible for this topic	Yes, with limited influence on outcomes (e.g., limited access to internal information, limited decision-making authority)	Yes, with moderate influence on outcomes (e.g., has access to relevant information, reports to senior manager)	Yes, with direct influence of some outcomes (e.g., has access to relevant information, includes one or more senior manager with decision making rights)	Yes, with direct influence at the highest levels of the company (e.g., has access to relevant information, includes most senior members of company)
Human Rights					✓
Labour Rights / Decent Work					✓
Environment					✓
Anti-Corruption					✓

An ESG Committee was established in June 2023 to better identify, assess and remediate Environmental, Social and Governance issues relevant to Ethixbase360, our operations and our value chain. This committee is made up of a cross functional team with representatives from the highest levels of our organisation and works to regular targets to ensure we practice what we preach. Furthermore, the Board of Directors and the Company’s shareholders receive regular progress reports and an annual report from the ESG Committee covering ESG targets, issues and workstreams.

# Governance

## G5

Does the company have a formal structure(s) (such as a cross-functional committee) to address each of the following sustainability topics?

	No formal structure	Yes, with limited influence on outcomes (e.g., limited access to internal information necessary to understand risks, poor representation from relevant departments or functions)	Yes, with moderate influence on outcomes (e.g., includes representatives of some functions, departments, or business units most relevant for addressing the risks concerned, has access to relevant information, reports to senior manager)	Yes, with direct influence on some outcomes (e.g., includes representatives of functions, departments, or business units most relevant for addressing the risks concerned, has access to relevant information, involves one or more members of senior management)	Yes, with direct influence at the highest level of the company (e.g., full access to relevant information, involves members at highest level of company)
Human Rights					✓
Labour Rights / Decent Work					✓
Environment					✓
Anti-Corruption					✓

An ESG Committee was established in June 2023 to better identify, assess and remediate Environmental, Social and Governance issues relevant to Ethixbase360, our operations and our value chain. This committee is made up of a cross functional team with representatives from the highest levels of our organisation and works to regular targets to ensure we define and meet the Environmental, Social and Governance standards we adopt. C suite representatives, including our CEO and others from our product & technology, people and culture, finance, legal, marketing and operations are represented on this cross functional committee. Furthermore, the Board of Directors and the Company's shareholders receive regular progress reports and an annual report from the ESG Committee covering ESG targets, issues and workstreams.

## Governance G6

Does the company have a process(es) to assess risk?

	No, this is not a current priority	No, but we plan to within the next two years	Yes, related to our own operations	Yes, related to our own operations and suppliers [Prompts G6.1]	Yes, related to our own operations and the value chain (including suppliers, consumers, communities, other business relationships) [Prompts G6.1]
Human rights risks					✓
Labour rights risks					✓
Environmental risks					✓
Corruption risks					✓

The CEO and CFO are responsible for the ongoing currency of an organisation wide risk register covering key E S and G topics deemed material to our business. The results of this register are reported regularly to our board and shareholders. In addition to this, a quarterly ESG questionnaire is completed for key investors - the results of which feed into the company wide risk register on a regular basis.



## Governance

### G6.1

During the assessment of risk, has the company identified those suppliers and/or other business relationships where the risk related to human rights, labour, environment and/or anti-corruption may be particularly severe?

	No	Yes
Human rights risks		✓
Labour rights risks		✓
Environmental risks		✓
Corruption risks		✓

At Ethixbase360 we take a complete approach to third party risk management ensuring that all third parties go through at least baseline onboarding screening and ongoing monitoring against E, S & G risk factors. Where warranted third parties may be escalated to higher levels of due diligence and direct engagement strategies. All third parties and the results of risk-based due diligence are stored within the Ethixbase360 Third Party Risk Management platform to document our approach.

## Governance G7

Does the company have a due diligence process through which it identifies, prevents, mitigates, and accounts for actual and potential negative impacts on sustainability topics?

	No, this is not a current priority	No, but we plan to within the next two years	Yes, related to our own operations	Yes, related to our own operations and suppliers [Prompts G7.1]	Yes, related to our own operations and the value chain (including suppliers, consumers, communities, other business relationships) [Prompts G7.1]
Human rights risks					✓
Labour rights risks					✓
Environmental risks					✓
Corruption risks					✓

All third parties go through both onboarding screening and ongoing monitoring against E, S & G risk factors. Where warranted third parties may be escalate to higher levels of due diligence and engagement strategies. All third parties and the results of risk-based due diligence are stored within the Ethixbase360 Third Party Risk Management platform to document our approach.

## Governance

### G7.1

During the due diligence process, has the company identified those suppliers and/or other business relationships where the risk of adverse impacts on human rights, labour, environment and/or anti-corruption may be particularly severe?

	No	Yes
Human rights risks		✓
Labour rights risks		✓
Environmental risks		✓
Corruption risks		✓

## Governance G8

Does the company have a process(es) through which members of the company's workforce can raise concerns about the company's conduct on sustainability topics?

	No, this is not a current priority	No, but we plan to within the next two years	Yes, we have an informal process (e.g., through supervisors, others) [Prompts G8.1]	Yes, we have a formal process [Prompts G8.1]
Human rights risks				✓
Labour rights risks				✓
Environmental risks				✓
Corruption risks				✓

## Governance

### G8.1

Please provide additional detail regarding the process(es) the company has through which members of the company's workforce can raise concerns about the company's conduct.

	No	Yes
Is the process communicated to all employees/workers in local languages?	✓	
Is the process available to non-employees (e.g., suppliers, consumers, communities, and other business relationships)?		✓
Is the process confidential (e.g., whistleblowing process)?	✓	
Are there processes in place to avoid retaliation?		✓
Can concerns be raised about suppliers or other business relationships (e.g., clients, partners, etc.)		✓
Other	✓	

In addition to the above, we use various forums for employees and other stakeholders to voice any concerns they might have about aspects of the business. We have an bi-annual anonymous employee survey that encourages submission of any concerns. We also hold monthly Board meetings, Executive meetings, Operating Board meetings and company-wide regular town hall sessions where we talk specifically about our conduct.

In CY2024 we are implementing a Whistleblowing Policy and Process which will communicate any issues raised to a group appointed by the Board including the Group General Counsel and the People & Talent Director.

# Governance

## G9

How does the company capture lessons regarding each of the following sustainability topics?

	No lessons are regularly captured	Conducts investigation/ review of incidents as needed	Conducts investigation/ review of incidents and changes organisational policies, processes, and practices accordingly	Conducts investigation/ review and leverage's learnings to influence both internal and external affairs
Human Rights		✓		
Labour Rights / Decent Work		✓		
Environment		✓		
Anti-Corruption		✓		

Where incidents are raised they are surfaced to the ESG Committee for root cause analysis and discussion. Where applicable policies, processes and practices could be adjusted accordingly however this was not required during the reporting period.

## Governance G10

Is executive pay linked to performance on one or more of the following sustainability topics?

	No, this is not a current priority	No, but we plan to within the next two years	Yes
Human Rights	✓		
Labour Rights / Decent Work	✓		
Environment	✓		
Anti-Corruption	✓		

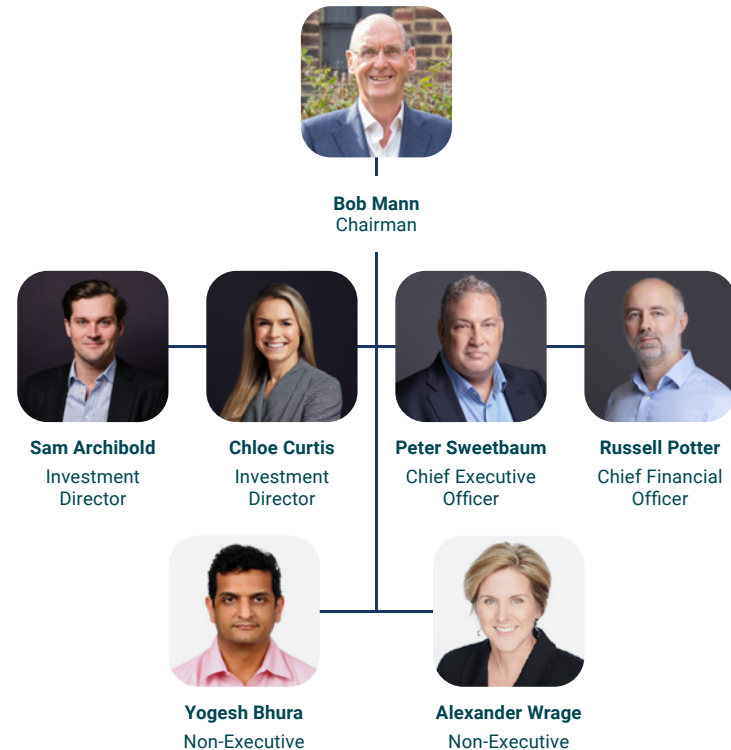
While this is not a priority at present we recognise the importance of this initiative and are considering future incentives for members of the executive board to ensure compliance with the Company's ESG objectives and reporting requirements.

# Governance

## G11

Please provide details regarding the company's board/highest governance body.

	Number
Total number of board members (#)	7
Male (%)	71
Female (%)	29
Non-binary (%)	0
Under 30 years old (%)	0
30-50 years old (%)	43
Above 50 years old (%)	57
From minority or vulnerable groups (%)	14
Executive (%)	29
Independent (%)	71





## Governance

### G12

#### G12. Do you produce sustainability reporting according to:

	National/local regulation on sustainability
	Security exchange regulations
	Non-Financial Reporting Directive of the European Union (NRFD)/Corporate Sustainability Reporting Directive (CSRD)
✓	Global Reporting Initiative (GRI)
	Sustainability Accounting Standards Board (SASB, now consolidated into the IFRS Foundation)
	International Integrated Reporting Council (IIRC, now consolidated into the IFRS Foundation)
	Climate Disclosures Standards Board (CDSB, now consolidated into the IFRS Foundation)
✓	Task Force on Climate-related Financial Disclosures (TCFD)
	Other voluntary frameworks
	No sustainability reporting according to any frameworks nor regulations outside of this Communication of Progress

Ethixbase360's Scope 1, 2 and 3 Greenhouse Gas (GHG) Emissions reporting is produced according to the Global Reporting Initiative (GRI) and Task Force on Climate-Related Financial Disclosures (TCFD).

## Governance

### G13

**G13. Is the information disclosed in this questionnaire assured by a third-party?**

<input checked="" type="checkbox"/>	Limited assurance for a minority of metrics (e.g. GHG emissions only)
<input type="checkbox"/>	Limited assurance for a majority of metrics
<input type="checkbox"/>	Reasonable assurance for a minority of metrics
<input type="checkbox"/>	Reasonable assurance for a majority of metrics
<input type="checkbox"/>	Other
<input type="checkbox"/>	No assurance for any metrics

Limited assurance of GHG emissions are provided by a third party. In regards to improving assurance we are aiming to work with material third parties in FY2025 to achieve more granular reporting and target sustainability goals and reduction targets more effectively.

# Human Rights

## HR1

Which of the following has the company identified as material human rights topics connected with its operations and/or value chain, whether based on their salience (e.g., the most severe potential negative impacts on people) or another basis?

<input checked="" type="checkbox"/>	Freedom of association and the effective recognition of the right to collective bargaining
<input checked="" type="checkbox"/>	Child labour
<input checked="" type="checkbox"/>	Forced labour
<input checked="" type="checkbox"/>	Non-discrimination in respect of employment and occupation
<input checked="" type="checkbox"/>	Safe and healthy working environment
<input checked="" type="checkbox"/>	Working conditions (wages, working hours)
<input checked="" type="checkbox"/>	Freedom of expression
<input type="checkbox"/>	Access to water and sanitation
<input checked="" type="checkbox"/>	Digital security / privacy
<input checked="" type="checkbox"/>	Gender equality and women's rights
<input type="checkbox"/>	Rights of indigenous peoples
<input type="checkbox"/>	Rights of refugees and migrants
<input type="checkbox"/>	Other

## Human Rights HR2

Does the company have a policy commitment in regarding the following human rights topics?

	No, and we have no plans to develop a policy	No, but we plan to within the next two years	Yes, included within a broader policy or as a stand-alone policy [Prompts HR2.1]
Freedom of expression		✓	
Digital security / privacy			✓
Gender equality and women's rights			✓

Please input the year the relevant human rights policy was last reviewed	Year (YYYY)
Digital security / privacy	2024
Gender equality and women's rights	2024

# Human Rights

## HR2.1

For each human rights policy commitment, is it:

	Aligned with international human rights standards	Publicly available	Approved at most senior level of the company	Applied to the company's own operations	Applied to the company's own operations and suppliers	Applied to the company's own operations and the value chain <small>(e.g., suppliers, consumers, communities, other business relationships)</small>	Developed involving human rights expertise from inside and outside the company	Other <small>(Please provide additional information) [Makes text box mandatory]</small>
Digital security / privacy	✓	✓	✓	✓	✓	✓		
Gender equality and women's rights		✓	✓	✓	✓	✓		

## Human Rights HR3

Within the reporting period, has the company engaged with potentially affected stakeholders or their legitimate representatives in relation to the following human rights topics?

	No engagement on this topic	To better understand the risks/impacts in question	To discuss potential ways to prevent or mitigate the risks/impacts in question	To agree on a way to prevent/mitigate the risks/impacts in question	To assess progress in preventing/mitigating the risks/impacts in question	To collaborate in the prevention/mitigation of the risks/impacts in question
Digital security / privacy	✓					
Gender equality and women's rights	✓					
Freedom of expression	✓					

# Human Rights

## HR4

What type of action has the company taken within the reporting period with the aim of preventing/mitigating the risks/impacts associated with the following human rights topics?

	No action within reporting period	Provided internal training/ capacity building for the direct workforce	Built capacity among relevant business relationships <small>(e.g., partners, suppliers, clients, etc.)</small>	Conducted an audit process and/or corrective action plan	Collective action with peers or other stakeholders to address the issue	Collaborated with governmental or regulatory bodies	Other <small>(Please provide additional information in the mandatory text box)</small>
Digital security / privacy		✓	✓				
Gender equality and women's rights			✓				
Freedom of expression	✓						

# Human Rights HR5

Who receives training for the following human rights topics?

	No training provided	Select employees	All employees	Contractors	Direct suppliers	Indirect suppliers	Other – such as partners, clients, etc.
Digital security / privacy			✓	✓			
Gender equality and women's rights	✓						
Freedom of expression	✓						

While all employees and contractors also receive Sexual Harassment training we would be overstating it to deem this gender equality and women’s rights training. At Ethixbase360 we have a diverse workforce and a strong commitment to equality of all forms, including reporting at a board level regarding our % of female management. Implementing gender equality and women’s rights training is desirable but not a priority at this time given our performance in this area. We are looking at introducing Diversity Equity & Inclusion (DE&I) training for all team members in H2 FY2025 to support and widen everyone’s knowledge on this important subject.

Digital security / privacy training is completed upon new employee onboarding and at least annually. Employees and contractors also receive regular communication regarding key digital risk areas and resilience strategies.



# Human Rights HR6

How does the company assess progress in preventing/mitigating the risks/impacts associated with the following human rights topics?

	No monitoring of progress	Review topics on ad hoc basis	Set annual targets/ goals, track progress over time <small>(internal programs only)</small>	Set annual targets/ goals, track progress over time <small>(internal and external programs)</small>	Other <small>(Please provide additional information)</small> <small>[Makes text box mandatory]</small>
Digital security / privacy			✓	✓	
Gender equality and women's rights			✓	✓	
Freedom of expression	✓				

All team members undertake digital security training within their onboarding plan when they join the company. This course is then refreshed annually with all team members by our IT Security team. In relation to gender equality and women's rights - we have internal targets we measure quarterly regarding our male/female team member split alongside our representation of women in Managerial and Executive positions. Over the course of the next financial year we will be weaving gender equality in to our recruitment process ensuring we are allowing fair representation from all diverse backgrounds.

# Human Rights

## HR7

Within the reporting period, has the company been involved in providing or enabling remedy where it has caused or contributed to adverse impact(s) associated with the following human rights topic(s)?

	No remedy provided/ enabled	Yes, remedy provided/ enabled	No adverse impact identified or caused	Choose to not disclose
Digital security / privacy			✓	
Gender equality and women's rights			✓	
Freedom of expression			✓	



## Human Rights

### HR8

**Briefly describe additional relevant, practical actions the company has taken within the reporting period and/or plans to take to implement the human rights principles, including any challenges faced and actions taken towards prevention and/or remediation.**

As part of the People and Talent strategy, our values, vision and mission have been reviewed and reworded to align with our three-year plan.

The results of this process were reported to the business in June 2024 (outside of the reporting period). Embedding these values will ensure we are continuing to practice fair recruitment process, promotion routes, appraisal and reward schemes in line with our sustainability goals.

## L1

Does the company have a policy commitment regarding the following labour rights principles?

	No, and we have no plans to develop a policy	No, but we plan to within the next two years	Yes, included within a broader policy or as a stand-alone policy [Prompts L1.1]	Not applicable (Please provide additional information in the mandatory text box)
Forced labour			✓	
Child labour			✓	
Non-discrimination in respect of employment and occupation			✓	
Safe and healthy working environment			✓	
Working conditions (wages, working hours)			✓	
Freedom of association and the effective recognition of the right to collective bargaining	✓			

Within the company, we have a Code of Conduct that clearly sets out our expectations of our team members behaviour whilst working for us. This is further supported by a Health and Safety policy, recruitment policy and Equality, Diversity and Inclusion policy. We also have a Supplier Code of Conduct for third parties which outlines the expected standards for third parties in these areas.

# Labour

## L1

Please input the year the relevant labour rights policy was last reviewed	Year (YYYY)
Forced labour	2024
Child labour	2024
Non-discrimination in respect of employment and occupation	2024
Safe and healthy working environment	2024
Working conditions (wages, working hours)	2024

# Labour

## L1.1

For each labour rights policy commitment, is it:

	Aligned with international labour standards	Publicly available	Approved at most senior level of the company	Applied to the company's own operations	Applied to the company's own operations and suppliers	Applied to the company's own operations and the value chain <small>(e.g., suppliers, consumers, communities, other business relationships)</small>	Developed in consultation with workers and their representatives	Developed involving labour rights expertise from inside and outside the company
Forced labour	✓	✓	✓	✓	✓	✓		
Child labour	✓	✓	✓	✓	✓	✓		
Non-discrimination in respect of employment and occupation	✓	✓	✓	✓	✓	✓		
Safe and healthy working environment	✓	✓	✓	✓	✓	✓		
Working conditions (wages, working hours)	✓	✓	✓	✓	✓	✓		

# Labour

## L2

Within the reporting period, has the company engaged with potentially affected stakeholders or their legitimate representatives in relation to the following labour rights topics?

	No engagement on this topic	To better understand the risks/ impacts in question	To discuss potential ways to prevent or mitigate the risks/ impacts in question	To agree on a way to prevent/ mitigate the risks/ impacts in question	To assess progress in preventing/ mitigating the risks /impacts in question	To collaborate in the prevention/ mitigation of the risks/ impacts in question	Other (Please provide additional information) [Makes text box mandatory]
Freedom of association and the effective recognition of the right to collective bargaining	✓						
Forced labour	✓						
Child labour	✓						
Non-discrimination in respect of employment and occupation	✓						
Safe and healthy working environment		✓					
Working conditions (wages, working hours)		✓					

# Labour

## L3

What type of action has the company taken within the reporting period with the aim of preventing/mitigating the risks/impacts associated with the following labour rights topics?

	No action within reporting period	Provided internal training/ capacity building for the direct workforce	Built capacity among relevant business relationships (e.g., suppliers, consumers, communities)	Conducted an audit process and/or corrective action plan	Collective action with peers or other stakeholders, in particular workers' organisations, to address the issue	Collaborated with governmental or regulatory bodies	Other (Please provide additional information) [Makes text box mandatory]
Freedom of association and the effective recognition of the right to collective bargaining	✓						
Forced labour		✓	✓		✓		
Child labour		✓	✓		✓		
Non-discrimination in respect of employment and occupation		✓	✓				
Safe and healthy working environment		✓	✓				
Working conditions (wages, working hours)		✓	✓	✓			



# Labour L4

Who receives training for the following labour rights topics?

Labour Topics:	No training provided	Select employees	All employees	Contractors	Direct suppliers	Indirect suppliers	Other – such as partners, clients, etc.
Freedom of association and the effective recognition of the right to collective bargaining	✓						
Forced labour			✓	✓			
Child labour			✓	✓			
Non-discrimination in respect of employment and occupation			✓	✓			
Safe and healthy working environment		✓					
Working conditions (wages, working hours)		✓					

# Labour L5

How does the company assess progress in preventing/mitigating the risks/impacts associated with the following labour rights topics?

	No monitoring of progress	Review topics on ad hoc basis	Set annual targets/ goals, track progress over time <small>(internal programs only)</small>	Set annual targets/ goals, track progress over time <small>(internal and external programs)</small>	Other <small>(Please provide additional information)</small> <small>[Makes text box mandatory]</small>
Freedom of association and the effective recognition of the right to collective bargaining	✓				
Forced labour		✓			
Child labour		✓			
Non-discrimination in respect of employment and occupation		✓			
Safe and healthy working environment			✓		
Working conditions (wages, working hours)			✓		

## Labour L6

Do(es) the existing collective bargaining agreement(s) provide(s) more favourable rights than those provided in legislation, where appropriate?

	Yes, by providing more favourable conditions related to wages
	Yes, by providing more favourable conditions related to working hours
	Yes, by providing more favourable conditions related to health coverage and/or sick leave
	Yes, by providing additional rights not otherwise provided
<input checked="" type="checkbox"/>	There is (are) no existing collective bargaining agreements
	No

## L7

Within the reporting period, what was the percentage of women in managerial positions? (%)

	Percent women (%) (Please input a whole number e.g., 50% = 50)	Unknown
Managerial position	42	

# Labour

## L8

What was the average ratio of the basic salary and remuneration of women to men (comparing jobs of equal value) within the reporting period?

	Salary ratio (%) (Please input a whole number (e.g., 50% = 50))	Unknown	Choose to not disclose
Women / Men (%)		<input checked="" type="radio"/>	<input type="radio"/>

## L9

Within the reporting period, how frequently were workers injured (injuries per hour worked)?

	Frequency of injury	Unknown	Choose to not disclose
Frequency of injury	0	<input type="radio"/>	<input type="radio"/>

## L10

Within the reporting period, what was the company's incident rate (injuries per worker)?

	Incident rate	Unknown	Choose to not disclose [Makes text box mandatory]
Incident rate	0	<input type="radio"/>	<input type="radio"/>

# Labour

## L11

Within the reporting period, has the company been involved in providing or enabling remedy where it has caused or contributed to adverse impact(s) associated with the following labour rights topics?

	No remedy provided/ enabled	Yes, remedy provided/ enabled	No adverse impact identified or caused	Choose to not disclose [Makes text box mandatory]
Freedom of association and the effective recognition of the right to collective bargaining			✓	
Forced labour			✓	
Child labour			✓	
Non-discrimination in respect of employment and occupation			✓	
Safe and healthy working environment			✓	
Working conditions (wages, working hours)			✓	



## Labour L12

**Briefly describe additional relevant, practical actions the company has taken within the reporting period and/or plans to take to implement the labour rights principles, including any challenges faced and actions taken towards prevention and/or remediation.**

FY2024 has been a foundational year for Ethixbase360 in a number of ways having reviewed a number of key items related to our sustainability credentials particularly in relation to labour rights principles. Some of these were released during the reporting period with others released in the months following, which will be reported in next year's submission.

**Some of these initiatives, driven in large part from our ESG Committee include:**

- New Whistleblowing policy to be released in CY2024
- New ESG & Sustainability policy to be released in CY2024
- New Supplier Code of Conduct released in reporting period that sets out our labour rights expectations for suppliers
- Employee training and investment in professional development
- Extended volunteer program facilitating paid time off for team members to give back to their communities.

# Environmental Commitment

## E1

Does the company have a policy commitment on the following environmental topics?

	No, and we have no plans to develop a policy	No, but we plan to within the next two years	Yes, included within a broader policy or as a stand-alone policy [Prompts E1.1]	Not applicable (Please provide additional information in the mandatory text box)
Climate change			✓	
Water				✓*
Oceans				✓*
Forests/Biodiversity/Land use				✓*
Air pollution			✓	
Waste (e.g., chemical spills, solid waste, hazardous, plastic, etc.)				✓*
Energy & resource use			✓	

As a software as a service (SaaS) business with a majority of remote workers we have conducted a review of our operations and view climate change, air pollution and energy & resource use to be 3 key areas of impact to our business, primarily in relation to our Scope 3 emissions and particularly staff travel. In regard to Water, Oceans, Forests/biodiversity/land use and waste (e.g. Chemical spills, solid waste, hazardous waste, plastics, etc.) this is not applicable given our business footprint. Material areas were covered by a Sustainability policy during this reporting period which is being reviewed and will be released in the second half of CY2024.

\* where a topic has been marked not applicable it may not appear in following questions to allow adequate space for additional information. Full responses regarding not applicable topics can be found in Ethixbase360's Digital Communication of Progress

# Environmental

## E1.1

For each environmental policy commitment, is it:

	Aligned with international environmental standards	Publicly available	Approved at most senior level of the company	Applied to the company's own operations	Applied to the company's own operations and suppliers	Applied to the company's own operations and the value chain <small>(e.g., suppliers, consumers, communities, other business relationships)</small>	Developed involving environmental expertise from inside and outside the company	Other <small>(Please provide additional information)</small>
Climate change			✓	✓	✓	✓		
Air pollution			✓	✓	✓	✓		
Energy & resource use			✓	✓	✓	✓		

Ethixbase360's sustainability policy covers a wide range of topics across Anti-Corruption, Human Rights, Labour Rights and the Environment. The Sustainability policy has undergone a review in CY2024 where we intend to align this with international environmental standards, expand to the value chain and make the policy publicly available.

Please input the year the relevant environment policy was last reviewed	Year (YYYY)
Climate change	2024
Air pollution	2024
Energy & resource use	2024



## Environmental E2

Within the reporting period, has the company engaged with potentially affected stakeholders or their legitimate representatives in relation to the following environmental topics?

	No engagement on this topic	To better understand the risks/impacts in question	To discuss potential ways to prevent/mitigate the risks/impacts in question	To agree on a way to prevent/mitigate the risks/impacts in question	To assess progress in preventing/mitigating the risks/ impacts in question	To collaborate in the prevention/mitigation of the risks/impacts in question	Other (Please provide additional information) [Makes text box mandatory]
Climate change		✓					
Air pollution		✓					
Energy & resource use		✓					

During the reporting period Ethixbase360 undertook a remote working and commuter survey with global employees to understand energy and resource use and travel related air pollution and emissions. This information was fed into our FY2024 emissions reporting.

## Environmental E3

What type of action has the company taken within the reporting period with the aim of preventing/mitigating the risks/impacts associated with the following environmental topics?

	No action within reporting period	Provided internal training/ capacity building for the direct workforce	Built capacity among relevant business relationships (e.g., suppliers, consumers, communities)	Conducted an audit process and/or corrective action plan	Collective action with peers or other stakeholders to address the issue	Collaborated with governmental or regulatory bodies	Other (Please provide additional information) [Makes text box mandatory]
Climate change			✓		✓		
Air pollution			✓		✓		
Energy & resource use			✓		✓		

Ethixbase360's focus during the FY2024 reporting period has been to better understand our risks and impacts so that future strategies can be accurately targeted to prevent, mitigate and reduce the impact of our business on climate change, air pollution and energy & resource use. The results of these actions have been tracked and are regularly reported upon as part of our ESG Development plan.

# Environmental E4

How does the company assess progress in preventing/mitigating the risks/impacts associated with the following environmental topics?

	No monitoring of progress	Review topics on ad hoc basis	Set annual targets/ goals, track progress over time <small>(internal programs only) [Prompts E4.1 and E4.2]</small>	Set annual targets/ goals, track progress over time <small>(internal and external programs) [Prompts E4.1 and E4.2]</small>	Other <small>(Please provide additional information) [Makes text box mandatory]</small>
Climate Change		✓			
Air pollution		✓			
Energy & resource use		✓			

The Ethixbase360 ESG Committee meets at least quarterly to discuss sustainability goals including those for climate change, air pollution and energy and resource use. Prior to FY2024 a decision was made to offset 100% of companywide business travel emissions via our business travel service, additionally we extended our Scope 3 emission reporting to ensure we have an extensive view of our emissions to better target prevention and mitigation efforts in the future. It is our aim to set reduction targets in future reporting periods. Lastly where possible in-person offices are powered by 100% renewable electricity - including our head office in London, UK and with key vendors such as our data centre.

## Environmental E5

Within the reporting period, has the company been involved in providing or enabling remedy where it has caused or contributed to adverse impact(s) associated with the following environmental topics?

	No remedy provided/ enabled	Yes, remedy provided/ enabled	No adverse impact identified or caused	Choose to not disclose
Climate change		✓		
Water			✓	
Oceans			✓	
Forests/Biodiversity/Land use			✓	
Air pollution		✓		
Waste (e.g., chemical spills, solid waste, hazardous, plastic, etc.)			✓	
Energy & resource use		✓		

During the reporting period Ethixbase360 has:

1. Elected to offset 100% of Co2 emissions associated with business travel.
2. Maintain our primarily remote working model post COVID-19 which helps to reduce overall emissions.
3. Where possible our in-person offices are powered by 100% renewable energy sources (including our head office in London, UK).
4. Where possible elect to select suppliers who utilize renewable energy, as is the case with our data centres.

More can be done to remedy these issues (including further limiting our emissions and energy use by setting targets for future reporting years). We endeavour to continue to improve year on year.

# Environmental

## E6

What were the company's gross Scope 1 and/or Scope 2 global greenhouse gas (GHG) emissions within the reporting period?

	Measured total emissions (tCO2e)	We did not measure our gross emissions (Please provide additional information) [Makes text box mandatory]
Scope 1 emissions	0	
Scope 2 emissions	0	

Ethixbase360 applies an operational control approach to carbon accounting, and as such incorporates scope 1 and 2 emissions for assets it has operational control over. As none of the offices in which Ethixbase360 operates are under operational lease, these are considered outside of operational control and are therefore included within the Scope 3 reporting. Furthermore, Ethixbase360 does not own or have long term lease on any vehicles or other assets relevant to Scope 1 emissions.

## E7

What were the company's gross Scope 3 global greenhouse gas (GHG) emissions within the reporting period?

	We measured Scope 3 GHG emissions [please input the measured tCO2e below]
	We did not measure Scope 3 GHG emissions

Our 2023 Scope 3 emissions were 733.78 tCO2e

# Environmental

## E7.1

Which Scope 3 categories are included in the company's Scope 3 emissions calculation?

✓	Purchased goods and services
	Capital goods
✓	Fuel – and energy-related activities
	Upstream transportation and distribution
	Waste generated in operations
✓	Business travel
✓	Employee commuting
	Upstream leased assets
	Downstream transportation and distribution

	Processing of sold products
	Use of sold products
	End-of-life treatment of sold products
	Downstream leased assets
	Franchises
	Investments
	Other – upstream
	Other - downstream

## Environmental E8

What percentage of the company's revenue was invested in R&D of low-carbon products/services within the reporting period?

	Percent of revenue (%) (Please input a whole number (e.g., 50% = 50))	Unknown	Not applicable (Please provide additional information) [Makes text box mandatory]
R&D for low-carbon products/services	0		

As a SaaS technology business, we do not provide physical products or services, however we do use hosting providers that have clear commitments to renewable energy, water usage and carbon neutrality.

# Environmental

## E9

### E9. Has the company acted to support climate change adaptation and resilience?

✓	We have taken action to increase company-wide resilience to climate change
✓	We have taken action to increase resilience in our supply chains
✓	We have taken action to increase resilience in the communities in which we operate
✓	We have provided funding for climate change adaptation and resilience initiatives and projects
	We have not taken actions to build climate change resilience in the reporting period
	Unknown

During the reporting period we have taken action to further understand our impact, including the risks and opportunities to our business to support climate change adaptation and resilience. This includes understanding what is material to our business and identifying strategies to minimise our impact. We have also engaged in collective action with our stakeholders, including investors, third parties and clients to create both company-wide climate change resilience and resilience in our supply chains (and the supply chains of our customers). We have provided funding for climate change adaptation and resilience initiatives such as carbon offsetting and scope 1,2 and 3 emissions tracking and facilitating an employee volunteering program which supplies paid time off for employees to contribute to their local communities.



# Environmental

## E10

Please report the company's renewable energy consumption as a percentage of total energy consumption within the reporting period.

	Percent of total energy consumption (%) (Please input a whole number (e.g., 50% = 50))	Unknown
Renewable energy consumption/total energy consumption		

Given the majority of our workforce are remote it is not possible for us to report with any assurance at this stage the % of our energy consumption which is from renewable sources. We would note however where we have the ability to select energy sources through our own operations renewable energy sources are prioritized - such as our head office location in London, United Kingdom and energy sources used for our data centres via Amazon Web Services (AWS) which is currently reported as being 90% renewable sources.

## E11

What percent of the company's revenue came from low-carbon products/services within the reporting period? If applicable, please give a description of the products/services included in your calculation (e.g., relevant certifications products/services included in your calculation (e.g., relevant certifications)).

	Percent of total revenue (%) (Please input a whole number (e.g., 50%=50))	Unknown	Not applicable (Please provide additional information) [Makes text box mandatory]
Low-carbon products and services/total revenue for the reporting period			

## Environmental E12

Which of the following has the company identified as material environmental topics connected with its operations and/or value chain (e.g. based on the most severe actual or potential negative impacts on people and/or the environment)?

	Water [Prompts E13, E14]
	Forests, Biodiversity and Land Use [Prompts E15, E16, E17]
<input checked="" type="checkbox"/>	Air pollution [Prompts E18]
	Waste (e.g. chemical spills, solid waste, hazardous, plastic etc.) [prompts E19, E20, E21]
	None of these topics have been identified as material by the company

As a software as a service (SaaS) business with a majority of remote workers we have conducted a review of our operations air pollution as a material environmental topic for our business, primarily in relation to our Scope 3 emissions and particularly staff travel. In regards to Water, Oceans, Forests/ biodiversity/land use and waste (e.g. Chemical spills, solid waste, hazardous waste, plastics, etc.) this is deemed not applicable given our business model.

# Environmental E18

Where applicable, please report the company's emissions of the following pollutants within the reporting period.

Air pollutant	Emissions (t)	Unknown	Not applicable (Please provide additional information) [Makes text box mandatory]
NOx		✓	
SOx		✓	
Volatile Organic Compounds (VOCs)		✓	
Hazardous air pollutants (HAPs)		✓	
Particulate matter (PM10)		✓	
Persistent organic pollutants (POPs)		✓	
Other (Please provide additional information)		✓	



## Environmental E22

**Briefly describe additional relevant, practical actions the company has taken within the reporting period and/or plans to take to implement the environment principles, including any challenges faced and actions taken towards prevention and/or remediation.**

During the reporting period Ethixbase360 has made strides to further understand our impact and take corrective action to minimise this impact and leverage opportunities for improvement. Some of the items already covered in this submission include managing and tracking our Scope 1, 2 and 3 emissions, ensuring renewable energy is used where possible and offsetting Co2 emissions where possible.

In future years we plan to set educated targets following these initiatives and work collaboratively with our supply chain to gain a more granular view of our Scope 3 emissions which are our greatest impact. Additionally, we will continue to work with our clients and their third parties to increase resilience and screen and monitor for environmental risks.

# Anti-Corruption

## AC1

Does the company have an anti-corruption compliance program?

	No this is not a current priority
	No, but we plan to within the next two years
✓	Yes [prompts AC1.1]

## AC1.1

If yes, in what year was this program last reviewed?

	Year (YYYY)
Program last reviewed	2022

## AC2

Does the company have policies and recommendations for employee procedures in case of doubt and/or in situations that may represent a conflict of interest, e.g. with regard to gifts and hospitality, donations, sponsorship, or interactions with public officials?

	No, and we have no plans to develop any policy/recommendation
	No, but we plan to within the next two years
✓	Yes, included within a broader policy or as a stand-alone policy

Yes, employees are provided with clear guidance via both the Employee Code of Conduct and a specific Entertainment, Gifts and Benefits policy. Both are required to be read, understood, and signed as part of employee and contractor onboarding. Additionally, employees and contractors undergo conflicts of interest training.

## Who receives training on anti-corruption and integrity?

	Select employees
✓	All employees
✓	Contractors
	Direct suppliers
	Indirect suppliers
	Other – such as partners, clients, etc.
	No training provided

Ethixbase360's Global Anti-Bribery Compliance Challenge for employees' course was rolled out to All Employees in FY2024. The course leverage's situational learning and scenario-based techniques to enhance learner engagement and retention and provides employees with guidance on regulatory requirements for anti-bribery compliance, types of behaviour that can trigger a violation and suggestions for how to respond in problematic situations. As part of the roleplay experience of the course, the learner visits core departments within an organisation, evaluating facts/ scenarios for potential bribery risks.

### Course objectives include:

- Identify which acts/behaviour constitute bribery based on global anti-bribery laws.
- Recognize bribery in real-world situations and possess the skills necessary to analyse situations and facts in order to avoid potentially problematic situations.
- Evaluate the risks bribery poses to both organisations and individuals.
- Understand why ethical conduct is important and the pitfalls of unethical conduct.

Additionally contractors received our Anti-Corruption Training (Intermediaries) course.

All employees and contractors received training on Conflicts of Interest.

## Anti-Corruption AC3.1

How often is such training provided?

	One time only	Every two or more years	Every year	Unknown
All employees		✓		
Contractors		✓		

## AC4

AC4. Does the company monitor its anti-corruption compliance program?

✓	Yes, through review on an ad hoc basis
	Yes, through internal employee self-evaluation
	Yes, through automated controls monitoring
	Yes, through other mechanisms (please provide additional information)
	No, we do not monitor the anti-corruption compliance program

## Anti-Corruption AC5

Please report the company's total number and nature of incidents of corruption within the reporting period.

	Number of incident(s) (Please describe the nature of the incidents in the text box below)	Unknown	Choose to not disclose
Confirmed within the reporting period, but related to previous years	0		
Confirmed within the reporting period, and related to the reporting period	0		

## AC6

AC6. Within the reporting period, what actions has the company taken to address suspected incidents of corruption?

	Initial case assessment
	Internal investigation
	Review by risk/ethics committee
	Review by board of directors
	External audit/review
	Other (please provide additional information)
<input checked="" type="checkbox"/>	Not applicable/no incidents in the reporting period



# Anti-Corruption

## AC6.1

Were these actions taken independently or in response to a dispute or investigation by a government regulator?

	Minority of actions taken in response to a dispute/investigation by a government regulator
	Majority of actions taken in response to a dispute/investigation by a government regulator
	All actions taken in response to a dispute/investigation by a government regulator
<input checked="" type="checkbox"/>	No action taken in response to a dispute/investigation by a government regulator

## AC7

Does the company engage in collective action against corruption?

	No, this is not a current priority
	No, but we plan to in the next two years
<input checked="" type="checkbox"/>	Yes (please provide additional information)

Collective action against corruption is core to Ethixbase360's ethos and product offering. Along with effective outreach to our clients, prospects and client third parties via our monthly newsletter the Ethics Exchange and global webinars and event series, a core component of our product offering is collaborative due diligence solutions. This is direct third-party engagement to raise standards and increase transparency. Tcertification™ is the gold standard globally in collaborative due diligence for Anti-Bribery and Corruption Compliance consisting of not just screening, monitoring and due diligence on third parties but also red flag review, multi-lingual anti-corruption training, policy review and implementation. Ethixbase360 ourselves are Tcertified. Further, Ethixbase360 espouses a Explore, Enhance and Engage methodology for an effective and complete risk-based response to anti-bribery and corruption with our risk-based approach to third party risk management being key to driving transparency, standards improvement and principled performance.



## Anti-Corruption AC8

**Briefly describe additional relevant, practical actions the company has taken within the reporting period and/or plans to take to implement the anti-corruption principle, including any challenges faced and actions taken towards prevention and/or remediation.**

At Ethixbase360 we work with our clients to eliminate corruption from global value chains with impactful and efficient third party risk management.

Embedded within our third party risk management platform, Ethixbase360 capabilities support an end-to-end approach to third party risk management for anti-corruption compliance. From risk assessment to risk-based due diligence solutions, third party training, certification, integrations and more we aim to give companies complete transparency into their value chains and elevate standards.

Having conducted millions of due diligence reviews with ongoing monitoring of third parties risk profiles daily for our clients we also promote best practices in anti-bribery and corruption compliance via our events and resources.

## About Ethixbase360

**Ethixbase360 is a value chain sustainability solutions business that delivers robust technology and data analytics to assist corporations and third parties in creating and maintaining sustainable business practices.**

We create the most intuitive, robust, and configurable platform to help firms globally elevate their third-party supply chain in the areas of anti-corruption, human rights, environment, and labour. **Contact us today for more information.**