

2025

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, 2024 to March 31, 2025.

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 2025, Ethixbase360 is again 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 and progress 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.

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Letter from the CEO



Having first aligned with the United Nations Global Compact and its Sustainable Development Goals in 2019, this year Ethixbase360 is proud to celebrate five years of active membership. At Ethixbase360, we recognize the critical importance of the United Nations Global Compact (UNGC) initiative and its principles in fostering a sustainable and responsible business environment. Our ongoing commitment to the UNGC reflects our belief in the fundamental goals of the initiative and our dedication to upholding these goals in all aspects of our operations and value chain, while empowering our clients to be catalysts of ethical change themselves.

Businesses across the globe are facing unprecedented times. In the last 12-18 months, over half the world's citizens have elected political leadership, reshaping geopolitics, and as a result, regulation and enforcement. This has also had a knock-on effect on value chain volatility along with shifting trade landscapes as companies look simultaneously for new areas of growth in trying economic times and, at times, alternative areas for supply. These changes and ongoing uncertainty are making it increasingly difficult for businesses to act with confidence.



Companies' values, statements, and ethics are being put to the test. Will they continue to act ethically, transparently, and to the benefit of human rights and the environment, or will this period of uncertainty, deregulation, and delays turn the tide on progress being made towards the Sustainable Development Goals? Only time will tell, and at Ethixbase360, we strongly hope and are pleasantly encouraged by what we continue to hear from our clients and the market. Anti-Corruption, Human Rights, Labour Rights, and Environmental Stewardship remain core tenets of our business and the businesses of our customers, stakeholders, employees, and third parties. We maintain our zero-tolerance policy for corruption in all its forms.

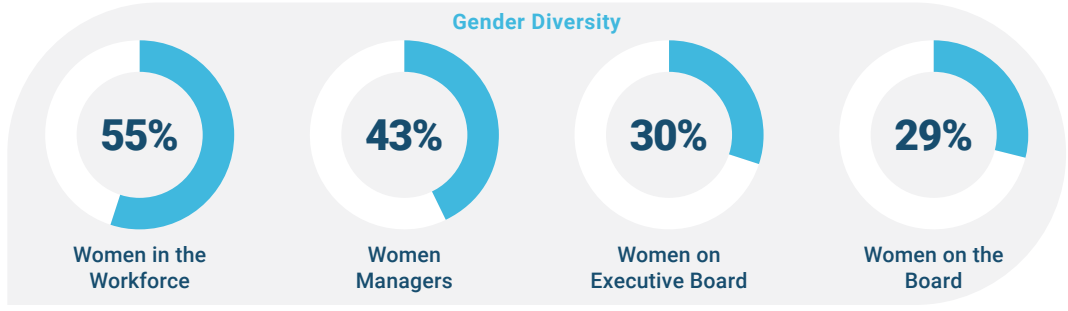
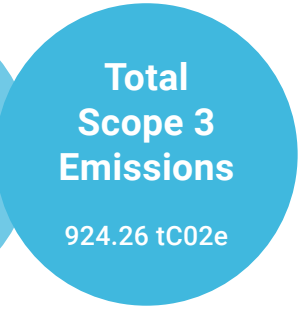
For the fifth year, I would like to reconfirm our commitment to the United Nations Global Compact. We are proud of what we have already accomplished and recognize there is still more to do. Transparency is key to our approach as we strongly believe that greater transparency leads to better accountability, the ability to benchmark, and drive positive change.

We remain committed to continuous improvement and fostering sustainable value chains across our own business and those of our clients across the globe.

Peter Sweetbaum,
Chief Executive Officer

FY2025 Highlights in Metrics

1 April 2024 - 31 March 2025



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.**

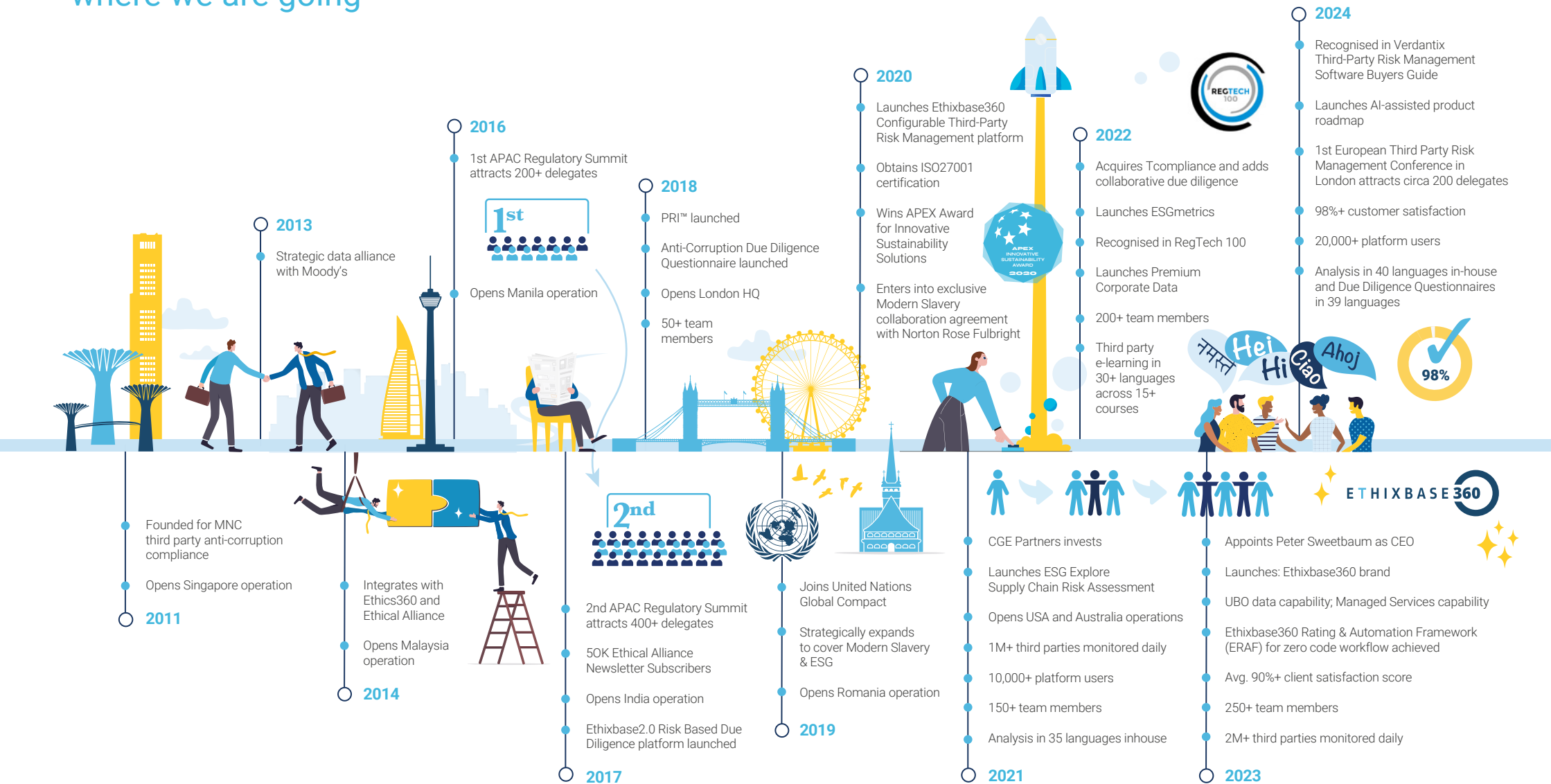


Partnership & Client Centricity

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 FY2025 Stakeholder Initiatives



Corporate Volunteering Program

Our corporate volunteering program continues to be well utilized by team members from across the globe, taking the opportunities to give back to their local communities or travel further afield. In fact, impressively in FY25 it increased by 78% from the prior reporting period!

Many of our team members already volunteer in their spare time. To encourage our team members in this effort Ethixbase360 is proud to support them with a day's paid leave for volunteering.

Look at our team go!

Increase in
Corporate
Volunteering
Adoption in
FY25

78%



Key FY2025 Stakeholder Initiatives

Well-Being Program



On the 10th October 2024 – World Mental Health Day (backed by the World Health Organization), Ethixbase360 took the opportunity to celebrate 2024’s theme of Mental Health at Work by launching a multi-pronged and ongoing well-being initiative at the company, introducing:

1

A new global wellbeing policy for employees and contractors.

2

Introducing a ‘no questions asked’ wellbeing day for global team members in addition to their annual leave entitlement. The purpose of this day is to give employees a mental health break should they require one.

3

A global well-being survey, the responses of which were used to gather a sense of common work stressors, what they are and what we can do to help support our team members and their mental health while they are at work.



Key FY2025 Stakeholder Initiatives

Empowering Career Development

Global eLearning Platform

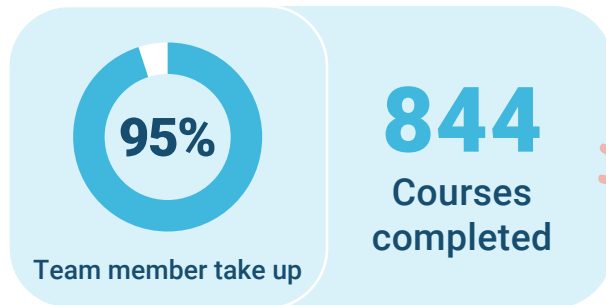
During the reporting period Ethixbase360 implemented a global learning management system that empowers our team members to take control of their learning and development with access to a wide range of courses, resources and certifications designed to help our team members grow as individuals and in their career.



To date over 250 team members have accessed the service completing over 844 courses on topics that interest them.

Some of the most popular of these courses cover topics such as:

- Artificial Intelligence
- Remote Team Communication
- Emotional Intelligence and Empathy
- The Importance of Good Work Life Balance



Key FY2025 Stakeholder Initiatives

Inaugural European Third-Party Risk & Compliance Summit, London

In 2024, as part of our commitment to advancing value chain transparency, we launched our annual Summit on Third-Party Risk Management and Compliance. This free event convened over 100 compliance professionals from a diverse range of industries across the UK and Europe.

The agenda featured speakers from the UK Serious Fraud Office (SFO), U.S. Department of Justice (DOJ), and Securities and Exchange Commission (SEC), alongside senior compliance and business leaders from major multinational companies.

The Summit provided a valuable forum for sharing best practices and exploring emerging developments in third-party risk management, with a particular focus on anti-corruption and modern slavery.

EUROPEAN
THIRD-PARTY
RISK MANAGEMENT
& COMPLIANCE

2024
SUMMIT



Board of Directors

The Shareholder Board is the ultimate responsible forum for ensuring governance and retaining fiduciary responsibility for the shareholders of the Ethixbase360 group.

The Shareholder Board review and ratify the strategy for the Ethixbase360 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.

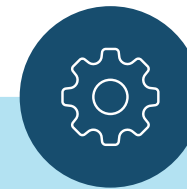


Executive Board



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 Ethixbase360 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 Ethixbase360 remains an employer of choice for Ethixbase360 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.



Ethixbase360'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.

Ethixbase360 Contribution During Reporting Period

As an employer across multiple countries Ethixbase360 is committed to the physical and mental wellbeing of our team members across the globe. Along with providing health cover this reporting period we have rolled out a global wellness policy, survey and a 'no questions asked' wellbeing day for global team members in addition to their annual leave entitlement.



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.

Ethixbase360 Contribution During Reporting Period

At Ethixbase360 Engagement is core to our approach to driving sustainability standards not only with our own team members but also with our clients and their third parties.

Inclusive and equitable education and learning opportunities for employees and contractors

All employees and contractors are trained on key topics such as anti-bribery and corruption, forced labor and digital security. In addition during this reporting period we have rolled out a global Learning Management System which allows our employees to self select topics of interest to them. You can learn more about this on page 11.

Sustainability focused training for clients and their third parties

Ethixbase360 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. During the reporting period we have seen gains across women in the workforce, women in managerial positions and women on the Executive board.

55% women in the workforce – up 2% from last reporting period

43% women in managerial positions, up 1% from the last reporting period

30% women on the executive board up 6% since the last reporting period

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).

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.



Ethixbase360'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.



Ethixbase360 Contribution During Reporting Period

During the reporting Period Ethixbase360 created 20 jobs across our 8 country operations and achieved 55% women in the workforce, a 2% increase on the previous year. 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.

Ethixbase360 Contribution During Reporting Period

Ethixbase360 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 sustainability 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 Sustainability 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.



2025 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 2025 covering the reporting period 01 April 2024 – 31 March 2025.



Success Stories & Future Priorities

SUCCESSFUL INITIATIVE(S) S1

Within the reporting period, is there an initiative(s), project(s), and/or policy(ies) of which the company is particularly proud?
This stand-out effort relates to:

✓	Governance
✓	Human Rights
✓	Labour
✓	Environment
✓	Anti-Corruption

During the reporting period there are several initiatives related to particularly the wellbeing and development of our staff and contractors of which we are particularly proud. On the 10th October 2024 – World Mental Health Day (backed by the World Health Organization), Ethixbase360 took the opportunity to celebrate 2024’s theme of Mental Health at Work by launching a multi-pronged and ongoing initiative at the company, introducing:

- A new global wellbeing policy for employees and contractors
- Introducing a ‘no questions asked’ wellbeing day for global team members in addition to their annual leave entitlement. The purpose of this day is to give employees a mental health break should they require one.
- A global well-being survey, the responses of which were used to gather a sense of common work stressors, what they are and what we can do to help support our team members and their mental health while they are at work
- Our inaugural annual Summit on Third-Party Risk Management and Compliance. This free event convened over 100 compliance professionals from a diverse range of industries across the UK and Europe. The agenda featured speakers from the UK Serious Fraud Office (SFO), U.S. Department of Justice (DOJ), and Securities and Exchange Commission (SEC), alongside senior compliance and business leaders from major multinational companies. The Summit provided a valuable forum for sharing best practices and exploring emerging developments in third-party risk management with a particular focus on anti-corruption, governance, human rights, modern slavery and sustainability.
- A global learning management system that empowers our team members to take control of their learning and development with access to a wide range of courses, resources and certifications designed to help our team members grow as individuals and in their career. Further information on the successful rollout and adoption of this program can be found in our [2025 Sustainability report](#).

As a business that aids our customers in combatting corruption and building transparency and resilience across governance, human and labor rights and environmental stewardship within their value chains we remain very proud of our ongoing platform and product development to support our clients and their third parties. We hear regularly of the ways in which our platform has been used to identify risks and enhance resilience in these areas. Some recent client case studies regarding these areas can be found on our website [here](#).

Disclaimer: These initiatives are self-reported and have not been independently verified by the UN Global Compact. By responding to this question, you consent to being contacted by the UN Global Compact regarding these initiatives for potential inclusion as examples in UN Global Compact resources.

FUTURE ISSUE AREA(S) PRIORITIZATION

S2

Which of the five issue areas does the company plan to prioritize in the next two years?

✓	Governance
✓	Human Rights
✓	Labour
✓	Environment
✓	Anti-Corruption
	None

As a business that aids our customers in combatting areas like corruption and modern slavery and building transparency and resilience across governance, human and labour rights and environmental stewardship within their value chains we prioritize all of these areas.

Specific initiatives we will be combatting in FY2026 include:

- The roll out of ISSB/EFRAI VSME aligned Supplier Environmental Readiness programs to assist our clients in gaining greater insight into their supply chains readiness to meet sustainability reporting criteria.
- Cyber Risk Management for Third Parties. With third party breaches being one of the leading causes of cyber-attacks Ethixbase360 has partnered with S-RM in FY26 to bring to market a comprehensive Cyber-focused Third-Party Risk Management solution. This will aid in protecting our clients, their third parties and the private data and digital security of their stakeholders.
- For our team members, an updated Diversity, Equity and Inclusion policy affirming our commitment to DE&I initiatives.
- Continued engagement with our customers, regulators and the market via our now annual Third Party Risk Management and Compliance Summit held once again at the May Fair Hotel London in June 2025

POLICIES AND RESPONSIBILITIES

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 organizational sustainability targets
✓	Supervise Environmental, Social, and Governance reporting
✓	Regularly review potential risks related to the business model
	None of the above

POLICIES AND RESPONSIBILITIES

G2

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 (e.g., suppliers, consumers, communities, other business relationships)
Human Rights				✓	
Labour Rights / Decent Work				✓	
Environment				✓	
Anti-Corruption				✓	

POLICIES AND RESPONSIBILITIES

G3

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					✓

POLICIES AND RESPONSIBILITIES

G3.1

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					✓

PREVENTION

G4

Does the company have a process to identify, assess and mitigate risks related to the following sustainability topics?

	No, this is not a current priority	No, but we plan to within the next two years	Yes, conducted by a designated individual or group	Yes, engaging employees across the company	Yes, engaging employees and business partners	Yes, engaging employees, business partners and external stakeholders
Human rights risks					✓	
Labour rights risks					✓	
Environmental risks					✓	
Corruption risks					✓	

PREVENTION

G4.1

As part of the risk identification, assessment and mitigation process, has the company identified business partners and external stakeholders where the risk related to human rights, labour, environment and/or corruption may be particularly severe?

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

PREVENTION

G5

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	Yes, related to our own operations and the value chain (including suppliers, consumers, communities, other business relationships)
Human rights risks					✓
Labour rights risks					✓
Environmental risks					✓
Corruption risks					✓

PREVENTION

G5.1

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?

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

CONCERNS AND GRIEVANCE MECHANISMS

G6

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, but we plan to within two years	Yes, we have an informal process (e.g., through supervisors, others)	Yes, related to our own operations	Yes, we have a formal process
Human Rights				✓
Labour Rights / Decent Work				✓
Environment				✓
Anti-Corruption				✓

CONCERNS AND GRIEVANCE MECHANISMS

G6.1

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.

	Yes	No
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 (Please provide additional information)		✓

TRACKING ACTION EFFECTIVENESS

G7

How does the company track the effectiveness of its actions, and the related impacts, of the following sustainability topics?

	No actions and related impacts are systematically tracked	Conducts investigation reviews of incidents on an as-needed basis	Conducts investigation/review of incidents and changes organizational policies, processes and practices accordingly	Conducts investigation reviews and leverages learnings to influence both internal and external affairs
Human Rights			✓	
Labour Rights / Decent Work			✓	
Environment			✓	
Anti-Corruption			✓	

EXECUTIVE PAY

G8

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		✓	

LEADERSHIP COMPOSITION

G9

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

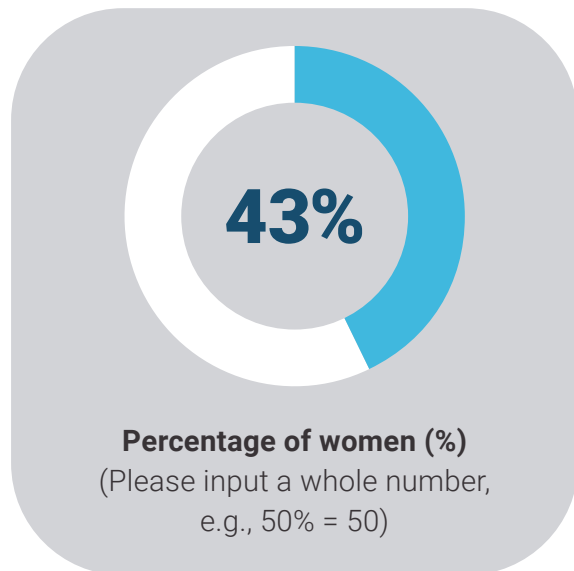
	Number
Total number of board members (#)	7
Male (%)	71
Female (%)	29
Non-binary (%)	0
Under 30 years old (%)	0
30-50 years old (%)	43
Above 50 years old (%)	57
From minority or vulnerable groups (%)	14
Executive (%)	29
Independent (%)	71



LEADERSHIP COMPOSITION

G10

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



LEADERSHIP COMPOSITION

G11

What is the gender representation of the company's C-suite or equivalent executive leadership positions?

	Women	Men	Other* (e.g., non-binary)	Not applicable (e.g., the company does not have this position)	Choose not to disclose
Chief Executive Officer		✓			
Chief Financial Officer		✓			
Chief Procurement Officer				✓	
Chief Technology Officer		✓			
Chief Marketing Officer	✓				
Chief Operations Officer				✓	
Chief Sustainability Officer				✓	
Chief Legal Officer/General Counsel		✓			
Chief Human Resources Officer	✓				
Other (Please provide additional information)	✓	✓			

*Chief Research Officer - Women, Chief Revenue Officer-Man

DATA ASSURANCE

G12

Do you produce sustainability reporting according to:

	National/local regulation on sustainability
	Security exchange regulations
	Non-Financial Reporting Directive of the European Union (NFRD)/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 Disclosure Standards Board (CDSB, now consolidated into the IFRS Foundation)
✓	Task Force on Climate-related Financial Disclosures (TCFD)
✓	Carbon Disclosure Project (CDP)
	Science Based Targets initiative (SBTI)
✓	Other voluntary frameworks (Please provide additional information)
	No sustainability reporting according to any frameworks nor regulations outside of this Communication on Progress

G12A

Other voluntary frameworks (please provide additional information):

The UN Global Compact (UNGC) digital submission for the Communication on Progress (CoP) follows a framework based on the Ten Principles of the UN Global Compact, which are derived from the Universal Declaration of Human Rights, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work, the Rio Declaration on Environment and Development, and the United Nations Convention Against Corruption.

DATA ASSURANCE

G13

Is some or all of the information disclosed in this questionnaire assured by a third-party?

Yes	No
<input checked="" type="checkbox"/>	<input type="checkbox"/>

Limited third party assurance provided on emissions metrics.

Human and Labour Rights

MATERIALITY

HR/L1

Which of the following has the company identified as material human and labour rights topics connected with its operations and/or value chain?

	Freedom of association and the right to collective bargaining
✓	Child labour
✓	Forced labour
✓	Non-discrimination in respect of employment and occupation
✓	Safe and healthy working environment
✓	Wages
✓	Working hours
✓	Gender equality and women's rights
✓	Freedom of expression
✓	Digital security and privacy
✓	Product and service end-user rights
✓	Security arrangements
	Right to clean and healthy environment: pollution, water, air and land
	Land rights and rights of Indigenous Peoples
✓	Rights of vulnerable groups and minorities
	Raw material sourcing
	Other

MATERIALITY

HR/L1.1

From the identified topics, please select up to six that are considered most material to the company's operations and/or its value chain.

	Freedom of association and the right to collective bargaining
✓	Child labour
✓	Forced labour
✓	Non-discrimination in respect of employment and occupation
✓	Safe and healthy working environment
✓	Wages
	Working hours
	Gender equality and women's rights
	Freedom of expression
✓	Digital security and privacy
	Product and service end-user rights
	Security arrangements
	Rights of vulnerable groups and minorities

COMMITMENT

HR/L2

Does the company have a policy commitment in relation to the following human rights & labour rights topics?

Human Rights & Labour 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 standalone policy	Not applicable (Please provide additional information)	Please input the year the relevant human rights & labour rights policy was last reviewed
Freedom of association and the right to collective bargaining	✓				
Child labour			✓		2024
Forced labour			✓		2024
Non-discrimination in respect of employment and occupation			✓		2024
Safe and healthy working environment			✓		2024
Gender equality and women's rights			✓		2024
Wages			✓		2024
Digital security and privacy			✓		2024

COMMITMENT HR/L2.1

For each human rights & labour rights policy commitment, is it:

Human Rights & Labour Rights Topics:	Aligned with international human/ labour 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 (e.g., suppliers, consumers, communities, other business relationships)	Developed involving human rights/labour expertise from inside and/ or outside the company	Other (Please provide additional information)
Child labour	✓	✓	✓	✓	✓	✓		
Forced labour	✓	✓	✓	✓	✓	✓		
Non-discrimination in respect of employment and occupation	✓	✓	✓	✓	✓	✓		
Safe and healthy working environment	✓	✓	✓	✓	✓	✓		
Gender equality and women's rights	✓	✓	✓	✓	✓	✓		
Wages	✓	✓	✓	✓	✓	✓		
Digital security and privacy	✓	✓	✓	✓	✓	✓		

PREVENTION

HR/L3

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

Human Rights & 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
Freedom of association and the right to collective bargaining	✓					
Child labour	✓					
Forced labour	✓					
Non-discrimination in respect of employment and occupation	✓					
Safe and healthy working environment		✓				
Gender equality and women's rights		✓				
Wages		✓	✓	✓	✓	✓
Digital security and privacy	✓					

PREVENTION

HR/L4

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 & labour rights topics?

Human Rights & 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 to address the issue	Collaborated with governmental or regulatory bodies	Other (Please provide additional information)
Freedom of association and the right to collective bargaining	✓						
Child labour		✓	✓		✓		
Forced labour		✓	✓		✓		
Non-discrimination in respect of employment and occupation		✓	✓				
Safe and healthy working environment		✓	✓				
Gender equality and women's rights		✓	✓				
Wages			✓				
Digital security and privacy		✓					

PREVENTION

HR/L4.1

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

Human Rights & Labour Rights Topics:	No monitoring of progress	Review topics on an ad hoc basis	Set annual targets/ goals, track progress over time (internal programmes only)	Set annual targets/ goals, track progress over time (internal and external programmes)	Other (Please provide additional information)
Child labour		✓			
Forced labour		✓			
Non-discrimination in respect of employment and occupation		✓			
Safe and healthy working environment		✓			
Gender equality and women's rights		✓			
Wages					✓
Digital security and privacy		✓			

The salary process at Ethixbase360 is reviewed annually with an external benchmarking organization along with the Executive Committee, Director of People & Talent and Finance in order to ensure wages are set fairly. Additionally, Ethixbase360 details a requirement that minimum wage laws are met and other requirements in our Supplier Code of Conduct.

RESPONSE AND REPORTING

HR/L5

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 & labour rights topic(s)?

Human Rights & Labour Rights Topics:	No adverse impact identified or caused	Yes, adverse impact(s) identified, but no remedy provided/enabled	Yes, adverse impact(s) identified, and remedy provided/enabled	Choose not to disclose
Freedom of association and the right to collective bargaining	✓			
Child labour	✓			
Forced labour	✓			
Non-discrimination in respect of employment and occupation	✓			
Safe and healthy working environment	✓			
Gender equality and women's rights	✓			
Wages	✓			
Digital security and privacy	✓			

RESPONSE AND REPORTING

HR/L6

What was the average gender pay gap (comparing jobs of equal value) during the reporting period?

	Average gender pay gap (%) (Please input a whole number, e.g., 50% = 50)	Unknown	Choose not to disclose
Gender Pay Gap		<input checked="" type="radio"/>	<input type="radio"/>

Given the geographic spread of our operations (across 8 countries) it is presently not feasible to report our Gender Pay Gap. We will continue to examine the feasibility of this in future years.

HR/L7

Within the reporting period, what was the rate of recordable work-related accidents for employees?

	Rate of work-related accidents (Please input a whole number, e.g., 50% = 50)	Unknown	Choose to not disclose
Rate of work-related accidents	0	<input type="radio"/>	<input type="radio"/>

Environment

COMMITMENT

E1

Does the company have a policy commitment in relation to the following environmental topics?

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	Not applicable (Please provide additional information)	Please input the year the relevant environmental policy was last reviewed
Climate change			✓		2024
Water				✓	
Oceans				✓	
Nature and biodiversity				✓	
Air pollution			✓		2024
Waste (e.g., chemical spills, solid waste, hazardous, plastic, etc.)				✓	
Energy & resource use			✓		2024
Other environmental topic(s) (Please provide additional information)				✓	

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.

COMMITMENT

E1.1

For each environmental policy commitment, is it:

Environmental Topics:	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 (e.g., suppliers, consumers, communities, other business relationships)	Developed involving environmental expertise from inside and/or outside the company	Other (Please provide additional information)
Climate change			✓	✓	✓	✓		
Air Pollution			✓	✓	✓	✓		
Energy & resource use			✓	✓	✓	✓		

PREVENTION 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)
Climate change		✓					
Air pollution		✓					
Energy & resource use		✓					

PREVENTION

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			✓		✓		

PREVENTION

E3.1

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

Environmental Topics:	No monitoring of progress	Review topics on an ad hoc basis	Set annual targets/ goals, track progress over time (internal programmes only)	Set annual targets/ goals, track progress over time (internal and external programmes)	Other (Please provide additional information)
Climate change					✓
Air pollution					✓
Energy & resource use					✓

Ethixbase360 has been gathering information globally on our use of energy and resources and how this relates to air pollution to give us a benchmark of our emissions over this time period. Additionally, we have conducted remote worker surveys with our team members during this time and consolidated our travel bookings through a single provider with carbon offsets. As a result of this work over the last 2 financial years we are moving towards setting goals in future reporting periods.

PREVENTION

E4

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?

Environmental Topics:	No adverse impact identified or caused	Yes, adverse impact(s) identified, but no remedy provided/enabled	Yes, adverse impact(s) identified, and remedy provided/enabled	Choose not to disclose
Climate change			✓	
Water	✓			
Oceans	✓			
Nature and biodiversity	✓			
Air pollution			✓	
Waste (e.g., chemical spills, solid waste, hazardous, plastic, etc.)	✓			
Energy & resource use			✓	
Other environmental topic(s)	✓			

CLIMATE ACTION

E5

Does the company have a target(s), validated by a third-party, relating to the reduction of greenhouse gas (GHG) emissions?

	Known	Baseline year	Target year	No targets set
Scope 1 targets validated by a third-party				✓
Scope 2 targets (market-based) validated by a third-party				✓
Scope 2 targets (location-based) validated by a third-party				✓
Scope 3 targets validated by a third-party				✓
Set targets are not validated by a third-party				✓



CLIMATE ACTION

E6

Within the reporting period, did the company measure Scope 3 global greenhouse gas (GHG) emissions?

	Known	Measured total emissions (tCO2e)	Yes, partially measured	We did not measure Scope 3 emissions (Please provide additional information)
Scope 3 emissions	✓	924		

E6.1

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

✓	Purchased goods and services		Downstream transportation and distribution
	Capital goods		Processing of sold products
✓	Fuel- and energy-related activities		Use of sold products
	Upstream transportation and distribution		End-of-life treatment of sold products
	Waste generated in operations		Downstream leased assets
✓	Business travel		Franchises
✓	Employee commuting		Investments
✓	Upstream leased assets		Other - upstream/Other - downstream

CLIMATE ACTION

E7

Does the company have a climate adaptation plan?

	Yes, and it includes physical risk assessments
	Yes, and it includes a physical climate risk scenario analysis
	Yes, and it includes actions to increase adaptation and resilience in the communities in which we operate
✓	No, but we plan to within the next two years
	No

ENERGY / RESOURCE USE

E8

Has the company taken steps to reduce its fossil fuel consumption within the reporting period?

Yes	No
✓	

Where available selection of renewable energy sources is prioritized over fossil fuel consumption. Where we have the ability to select energy sources through our own operations or those of our suppliers, renewable energy sources are prioritized - such as our head office location in London, United Kingdom and energy sources used for our data centers via Amazon Web Services (AWS).

ENERGY / RESOURCE USE

E9

Has the company increased its direct/indirect investment in low-carbon technologies (e.g., renewable energy, nuclear energy, carbon capture and storage (CCS)) during the reporting period?

	Yes, we have increased direct/indirect investment in renewable energy
	Yes, we have increased direct/indirect investment in nuclear energy
	Yes, we have increased direct/indirect investment in carbon capture and storage (CCS)
	Yes, we have increased direct/indirect investment in other low-carbon technologies
✓	No change – direct/indirect investment in low-carbon technologies remained the same
	No, we have decreased direct/indirect investment in low-carbon technologies

ADDITIONAL TOPIC-SPECIFIC QUESTIONS

E10

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)?

<input checked="" type="checkbox"/>	Climate change
<input type="checkbox"/>	Oceans
<input checked="" type="checkbox"/>	Energy & resource use
<input type="checkbox"/>	Water
<input type="checkbox"/>	Nature and biodiversity
<input checked="" type="checkbox"/>	Air pollution
<input type="checkbox"/>	Waste (e.g., chemical spills, solid waste, hazardous, plastic, etc.)
<input type="checkbox"/>	None of the topics have been identified as material by the company

Anti-Corruption

COMMITMENT AC1

Does the company have an anti-corruption compliance programme?

	No, this is not a current priority
	No, but we plan to within the next two years
✓	Yes

AC1.1

Is the anti-corruption compliance programme:

✓	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 (e.g., suppliers, consumers, communities, other business relationships)
	Other

COMMITMENT

AC1.2

Does the company monitor its anti-corruption compliance programme?

✓	Yes, through review on an adhoc basis
	Yes, through internal employee self-evaluations
	Yes, through automated controls monitoring
	Yes, through external independent monitoring
	Yes, through other mechanisms
	No, we do not monitor the anti-corruption compliance program

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

COMMITMENT

AC3

Does the company engage in collective action against corruption?

	No, this is not a current priority
	No, but we plan to within the next two years
	Yes

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.

PREVENTION

AC4

Who receives training on anti-corruption and integrity?

	Selected employees
✓	All employees
✓	Third-party suppliers, contractors and/or consultants
	No training provided

AC4.1

How often is such training provided?

	One time only	Every two or more years	Every year	Unknown
All employees			✓	
Third-party suppliers, contractors and/or consultants			✓	

PERFORMANCE

AC5

Within the reporting period, have there been any suspected incidents of corruption?

Yes	No
	✓

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.**