



# Onclusive 2025 ESG Report



Onclusive

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# Introduction & Context

## CEO Letter

### **Hello and welcome to Onclusive's first ESG report.**

Since Onclusive was formed in 2022 from a combination of legacy businesses, we have taken huge strides as an organization. From launching industry-leading innovative products, which blend the best of AI and human intelligence, to upgrading the technology platform that powers everything we do, I'm thrilled to add this report to the list of milestones we've achieved.

Although we are still in the early stages of developing and implementing our ESG strategy, the fact this report exists is evidence not only of the progress we are already making, but of the maturity of our business in a global cultural-economic environment which has seen huge shifts in the way that ESG is viewed by stakeholders of all kinds.

While many businesses have paused or even rolled back their focus on sustainability and ED&I, at Onclusive we've continued to position these at the heart of how we work.

With over 1,150 colleagues working across the globe from San Francisco to Singapore, from Hamburg to Buenos Aires, it's important to us to reflect the diversity of our employees and to harness their drive, enthusiasm and energy to help build a company that we can collectively be proud of. As a business that works on the cutting edge of innovation and applies technology to other parties' licensed intellectual property, it's vital that our strategy is built on clear ethical commitments for the use of AI and protected intellectual property.

Many of the achievements outlined in this report are the result of our people putting in discretionary effort on top of their day jobs, and I count Onclusive incredibly lucky to have such passionate and dedicated employees.

I'm delighted we've been able to support them in making things happen, and it speaks volumes of the culture we are creating that we've done so much in such a short time.

While we're aware there is always more that we can do, the benefits of supporting and prioritizing ESG are clear to me and the leadership team at Onclusive.

From improving the day-to-day experience of our people, to fostering a customer-focused culture where we find new ways to create value, the actions we are taking position Onclusive for success in the future.

I could not be prouder of the progress we are delivering, and look forward to sharing new ESG milestones in the coming years.

**Thank you once again for reading.**



**Rob Stone**  
Chief Executive Officer



# Global ESG & Compliance Lead Intro

## Kickstarting ESG at Onclusive

2025 marks a key milestone in Onclusive's journey toward becoming a recognized and committed ESG leader: one that listens to the world and creates a positive impact both internally and externally.

This foundational year has seen major progress across our three core ESG objectives:

- Establishing Onclusive as a recognized ESG leader
- Fostering a thriving and engaged workforce
- Amplifying our overall impact

To achieve these goals, we have significantly strengthened our ability to collect and analyze the data that gives us a truly global view of our operations. In just one year, we have increased our ESG data points by 400%, enabling us to publish our first Carbon Footprint within this inaugural ESG Report.

With a clear understanding of where we stand, we can now begin defining measurable reduction targets for 2026.

On our journey toward greater compliance we have also reviewed, enhanced, and expanded our key policies. This year marked an important step forward in developing our Security program as we progress toward certification.

As we close 2025, we are launching and broadening our annual EcoVadis evaluations. Building on our French entity's current Silver rating, our UK entity will undergo evaluation in early 2026, with additional markets to follow.

As the ESG lead at Onclusive, I want to acknowledge and thank all the people who make the business what it is today. Their enthusiasm and commitment have powered a wide range of initiatives, from the *Women of Onclusive 2025* company cause, to the outstanding achievements in Equality, Diversity, and Inclusion throughout the year.

This is the vibrant heart of our ESG journey, where every employee's contribution helps shape a stronger and more connected community, and I am delighted to work for an organization where this is prioritized



**Yann Guilain**

VP Global Customer Success Strategy  
& Best Practices, Global ESG & Compliance lead.



# About Onclusive

At Onclusive, we gather and enrich the world's conversations across all media, empowering our clients with data, tools, and expertise to help them prove and improve their value.

Onclusive is the global benchmark for integrated media content, turning enriched data into actionable insight across every channel - online, print, broadcast, and social.

Our scalable solutions meet real-world needs: from self-service tools that track, measure, and manage media impact, to expert analysis that guides sharper decisions, to direct integration of enriched data into your ecosystem.

Our vision is to be the most trusted source of media and reputation intelligence, worldwide. Powered by innovation and elevated by people, we help our clients protect brand reputation, prove impact, and continually improve their value.

We do this by providing our customers with the most powerful integrated media database in the world, enriching over 28 million pieces of content each day to make sense of the fractured, fast-moving media landscape.

Formed via the combination of several legacy media monitoring and reputation businesses, Onclusive now employs more than 1,200 people and serves customers ranging from well-known brand names such as Aviva, Google, HP, McDonald's, NatWest, PepsiCo, Siemens, to independent niche businesses.

"To be the most  
trusted source of  
media and  
reputation  
intelligence,  
worldwide."

 Vision Statement


# Our Values

It's been shown time and again that companies with strong values have better financial performance, customer satisfaction, and faster growth. That's because values help to define a company to stakeholders and customers, acting as a North Star to help navigate through prosperous times, as well as uncertain periods.


At Onclusive, our Values are the foundation of our success, shaping the way we think, act, and work together. They reflect what matters most to us as a business and guide every choice we make, ensuring we stay true to who we are while moving with purpose and unity toward our Vision and Mission.

Our four values are:

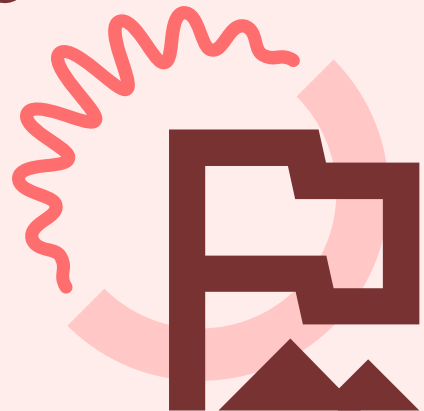
Go-getters




Collaborators



Pioneers



Masters Of Our Craft



# Go-Getters

## Description

- We are agile and adaptable
- We take initiative and anticipate the needs of others
- We are problem solvers
- We work at pace
- We're always willing to learn and focus on improving

## Attributes & Behaviors Agile

- Adaptable
- Fast-paced
- Forward thinking
- Responsive



# Collaborators

## Description

- We value openness and clear communication
- We are respectful of ideas and disagree agreeably
- We embrace diverse perspectives, recognizing that inclusivity leads to richer outcomes
- We work with integrity

## Attributes & Behaviors A Partner

- Collaboration
- Inclusion
- Communication
- Openness & respect



# Pioneers

## Description

- We're pioneers and innovators naturally curious and always looking to improve
- We share new ideas
- We seek continuous improvement and efficiency knowing we must stay ahead of the curve
- We are creative, making the most of the resources we have

## Attributes & Behaviors Innovative

- Creativity
- Initiative
- New technology & tools
- Value creation



# Masters of Our Craft

## Description

- We take pride in all our work, knowing that it supports our clients success
- We are accountable to our colleagues, clients and partners
- We value experience, exploration and the right to fail
- We are hard workers, while maintaining a strong work/life balance

## Attributes & Behaviors Trusted

- Accountability & ownership
- Industry knowledge & expertise
- Training & development



# ESG 2025 Overview

Following the creation of an ESG framework and strategy in early 2025, this report marks the first time we have shared our approach with stakeholders and interested parties.

As we continue to develop and mature our approach, we are committed to sharing our progress and the performance against our goals on an ongoing basis.

## Onclusive ESG at a glance

Environment	Social	Governance
<div>400% increase of data points gathered for the calculation of the Carbon Footprint</div> <div>Onclusive Carbon Footprint</div> <div>3062 tCO2e</div> <div>Sunset of 1 datacenters</div> <div>Ecovadis evaluation perimeter extended from France to the UK</div> <div>First energy consumption calculation</div> <div>1st Environmental Management Policy</div>	<div>Employees</div> <div>1150 average [2025]</div> <div>10+ Countries</div> <div>Gender ratio</div> <div>48% female colleagues (expressed gender only)</div> <div>Partnership with Sakhî for Girls Education in Mumbai</div> <div>Improvement of family friendly policies including Working From Home, Bereavement, and Maternity for our teams in Morocco and Singapore</div> <div>1st Mentoring program</div>	<div>First Double Materiality Matrix</div> <div>Percentage of women in the C-Suite</div> <div>38%</div> <div>Suppliers and contractors new code of conduct</div> <div>ESG Governance design</div> <div>Member of the Supply Chain Sustainability School</div> <div>ISO 27001 certification project launched</div>

# Alignment With UN Sustainable Development Goals

We align our ways of doing business with the UN's Sustainable Development Goals (SDGs). There are 17 SDGs in total, and we focus specifically on seven of them.

3

GOOD HEALTH  
AND WELL-BEING

**Why this goal matters to us:**  
It promotes a work environment that supports physical and mental wellness, promotes a healthy work-life balance, and encourages preventive health measures.

- At Onclusive, we diligently promote health and well-being for all our employees by offering programs which are designed to support both physical and mental health. These include access to medical benefits and health insurance plans.
- For instance, for the last two years, we have provided our colleagues with an extra day of leave in support of World Mental Health Day.
- We have also introduced a new wellbeing policy which allows colleagues to take a period of time away from their work to prioritize their mental health
- Our hybrid working model strengthens work-life balance, enabling greater flexibility and reducing stress associated with traditional office environments.

5


GENDER  
EQUALITY

**Why this goal matters to us:**  
Through gender equality, a workplace is created where everyone has fair access to opportunities, leadership roles, and career advancement.

- We firmly commit to promote gender equality in the workplace. Our Anti-Discrimination Policy ensures that all individuals, whatever gender, are treated with dignity and respect, and we address any instances of misconduct.
- To further strengthen our commitment, we maintain a fraud reporting channel, enabling employees to raise concerns or report complaints safely and without fear of retaliation.
- All forms of harassment are strictly prohibited, whether they occur on Onclusive premises or outside the workplace, including at social events, business trips, training sessions, or conferences.
- Currently, three out of eight executive leadership positions at Onclusive are held by women, and we are committed to ensuring strong female representation at all levels of the organization.

7

AFFORDABLE AND  
CLEAN ENERGY




**Why this goal matters to us:**  
By prioritizing sustainable energy solutions, we can support innovation, lower environmental impacts, and create healthier, more resilient communities for the future.

- As a global partner in media intelligence and communications technology, we are firmly committed to sustainable business practices.
- During 2024, we introduced a digital clean up initiative to raise awareness of memory storage on Onclusive technology devices.
- To support affordable energy goals, we are evaluating energy consumption through renewable sources at our workplace and premises, to help align with energy transition programs globally.
- We remain dedicated to promoting affordable and clean energy solutions as part of our broader commitment to environmental stewardship and sustainable growth.

8

DECENT WORK AND  
ECONOMIC GROWTH



**Why this goal matters to us:**  
Promoting decent work and sustainable economic growth empowers individuals, reduces inequalities, and strengthens communities.

- Within our business, sustainable growth is guided by decent work and inclusive opportunities. We are committed to treating all individuals connected to our operations and value chain with fairness, dignity, and respect.
- We fully comply with applicable labour laws, including those related to minimum wages, fair working hours, and safe working conditions. Our internal policies uphold the highest standards of ethical employment practices across all our locations.
- By fostering a diverse and inclusive environment, we aim to create opportunities for meaningful work and contribute to sustainable economic progress in the regions where we operate.

10

REDUCED  
INEQUALITIES



**Why this goal matters to us:**  
Strengthening social cohesion drives sustainable economic growth, and ensures that everyone has equal opportunities to thrive, regardless of their background or circumstances.

- We are committed to setting ambitious goals for workforce development, with a focus on training and upskilling individuals to bridge skills gaps and promote greater equality.
- Our focus on Equity, Diversity and Inclusion (ED&I) is rooted in the belief that diversity enhances our competitiveness and creates lasting value for our customers, shareholders, and employees.
- By working together, we strive to improve employee pay parity.



**Why this goal matters to us:**  
Proactive efforts to combat climate change also drive innovation, strengthen resilience, and create sustainable economic opportunities across industries.

- We continuously monitor our Scope 1, 2, and 3 greenhouse gas (GHG) emissions, ensuring alignment with globally recognized standards.
- Our long-term ESG roadmap includes initiatives such as reviewing the energy efficiency of our office equipment and exploring the integration of renewable energy sources.
- We are also updating our company policies and operational procedures to further strengthen sustainable practices across every area of our business.
- To support our transition to a lower-carbon future, we maintain a flexible hybrid working model, helping to reduce commuting emissions and lower our overall operational carbon footprint.



**Why this goal matters to us:**  
It is essential for building stable societies where human rights are protected, economic development can thrive, and individuals have confidence in fair and transparent systems.

- At Onclusive, we are dedicated to respecting and promoting human rights by conducting our business with integrity and partnering with organizations that advance social progress. We are committed to proactively preventing, identifying, and addressing any potential human rights impacts, while championing initiatives that create positive change.
- This commitment extends to all individuals working for, or on behalf of, Onclusive, ensuring that our operations consistently meet high ethical and legal standards.
- We align our practices with internationally recognized frameworks, including the Universal Declaration of Human Rights, the UN Guiding Principles on Business and Human Rights, International Labour Organization (ILO) Conventions, OECD Guidelines for Multinational Enterprises, and the principles of the UN Global Compact.
- Our priority areas include safeguarding freedom of association, promoting fair labor practices, ensuring non-discrimination, protecting children, maintaining safe and healthy workplaces, and advancing environmental stewardship.

# ESG Material Topics

We have identified and prioritized the environmental, social, and governance (ESG) topics which are crucial to our business success and our stakeholders.

Our first materiality matrix features our top 11 topics, and establishes the foundation for our future ESG disclosures and strategy.

As a global media intelligence and technology provider, our matrix is focused on the intersection of data, ethics, and people.

Topics such as **privacy and data security**, and **copyright** have emerged as high priorities, reflecting our commitment to protecting the data we handle, and ensuring the responsible use of our technology in the public sphere.


Critical social topics like **human capital development**, **employee health and well-being**, **supply chain standards**, and **ED&I** were also highlighted as important to the business.

This framework is also aligned with relevant UN Sustainable Development Goals (SDGs) and demonstrates our accountability to all stakeholders as we work to build a more responsible, inclusive, and sustainable business.

## Double Materiality Matrix

Business Impact and Stakeholders Importance



Material Topic	Primary UN SDG Link	Rationale
Business Ethics	<div>16PEACE, JUSTICE AND STRONG INSTITUTIONS</div> 	Ethical conduct is essential to maintaining stakeholder trust, ensuring accountability, and supporting sustainable business performance. This topic underpins all other responsible business practices.
Copyright & Content Integrity		Safeguarding intellectual property and ensuring lawful content use are critical to maintaining our reputation, compliance, and credibility.
Ethical AI		The increasing application of artificial intelligence makes ethical AI governance vital. Addressing algorithmic bias and ensuring transparency enhances public trust and reduces ethical and regulatory risks.
Regulatory Compliance & Public Policy		Operating in a rapidly evolving regulatory environment, proactive compliance and ethical engagement in policy discussions are key to managing risks and contributing to responsible digital standards.
Privacy & Data Security		Protecting personal data and privacy is fundamental to stakeholder confidence, legal compliance, and business resilience.

Material Topic	Primary UN SDG Link	Rationale
Equity, Diversity & Inclusion (ED&I)	<div><div>10 REDUCED INEQUALITIES</div><div>5 GENDER EQUALITY</div></div>	A diverse and inclusive workforce fosters innovation, stronger decision-making, and employee engagement. This topic reflects our commitment to fairness, equal opportunities, and cultural competence.
Employee Health, Safety & Wellbeing	<div>3 GOOD HEALTH AND WELL-BEING</div>	Supporting the physical, mental, and emotional well-being of employees is essential to productivity, retention, and a positive workplace culture.
Human Capital Development	<div>8 DECENT WORK AND ECONOMIC GROWTH</div>	Ongoing investment in learning and skills development enables employees to adapt to change, drives performance, and secures our long-term competitiveness.
Supply Chain Standards		Upholding ethical and sustainable standards throughout the value chain helps prevent human rights violations, ensures fair labor practices, and reduces operational risks.
Carbon Emissions [Scope 1, 2 & 3]	<div>7 AFFORDABLE AND CLEAN ENERGY</div>	Climate change presents both strategic and operational risks. Measuring and reducing emissions demonstrates environmental responsibility and aligns with stakeholder and regulatory expectations.
Opportunities in Clean Technology	<div>13 CLIMATE ACTION</div>	Engaging with solutions and partnerships that champion clean and digital technologies drives innovation and supports the transition to renewable energy, helping reduce our carbon footprint.

# How ESG Aligns With Our Corporate Strategy

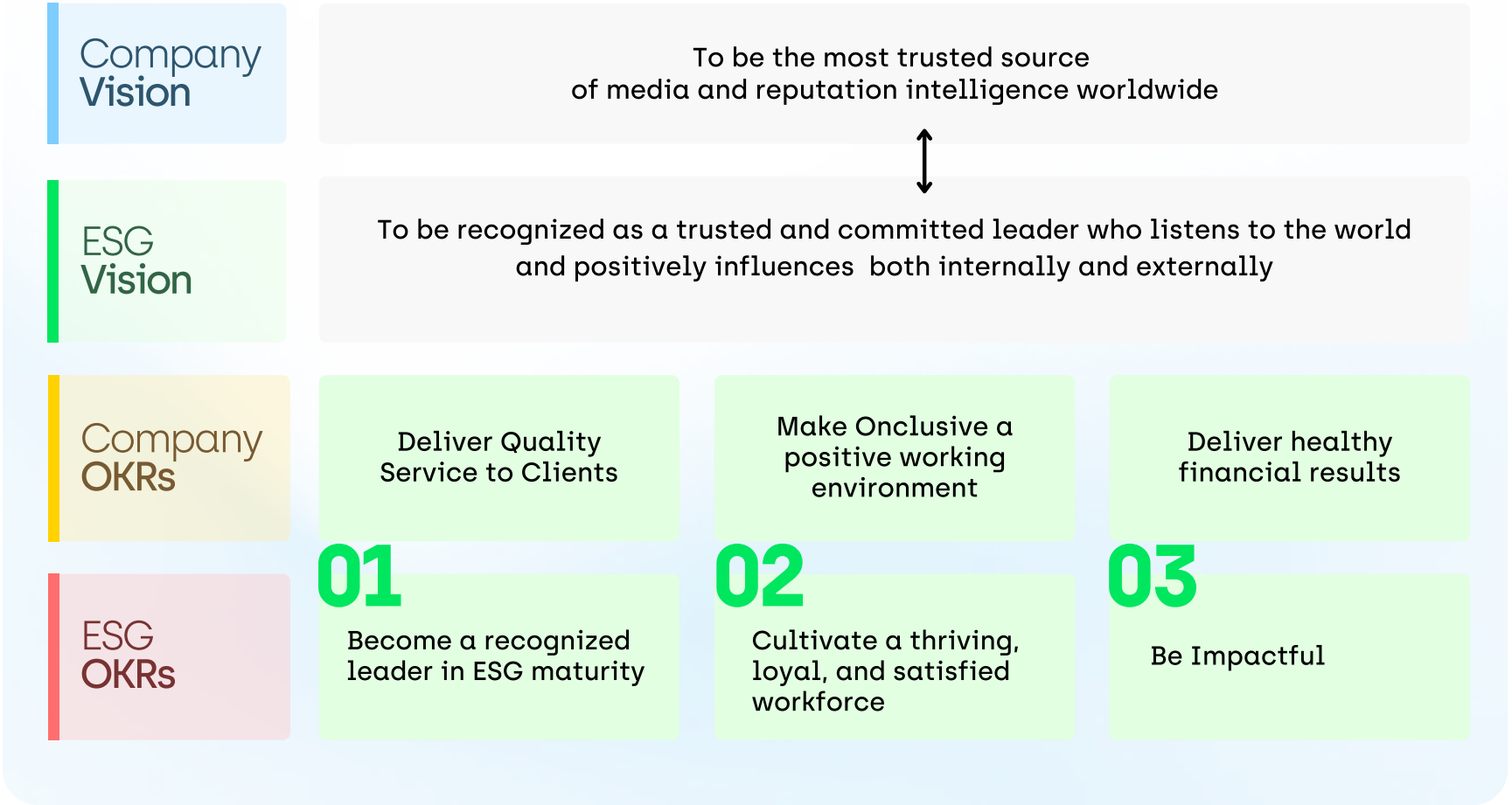
## Linking to our corporate strategy

At the beginning of 2025, we launched a new strategy, supported by Vision and Mission statements, and underpinned by corporate values which are embedded into our ways of working.



These support as well as inform the objectives we have for 2025. Collectively, this framework of cultural and practical guardrails ensures our adherence to global legal standards and establishes the ethical behavior expected of every employee and supplier.

In line with the company vision, our ESG statement is as follows: **Onclusive is working to be recognized as a trusted and committed leader who listens to the world and positively influences both internally and externally.**



2025 ESG objectives

We recognize the importance of ESG as part of the wider responsibilities expected of businesses in the 21st century, as more and more scrutiny is placed upon corporate social responsibility (CSR) from stakeholders and investors of all kinds.

Onclusive was formed of legacy businesses wherein ESG activity has been undertaken in the past. As such, our initial goal has been to bring together these, and the people who support them, so that we can establish a foundation on which to build for the future.

As with our ESG vision, our ESG Objectives and Key Results (OKRs) are directly derived from our corporate vision and OKRs. This ensures consistency and supports better understanding with our employees and key stakeholders.

Our ESG objectives are grouped into three areas, with a number of key results that we seek to deliver under each. You can learn more about these in the section below.

In creating a strategy to enhance our focus, we have set out a roadmap to continue maturing our approach, while establishing processes and methodologies that allow us to benchmark ourselves against international and best-practice standards.

In setting this foundational framework, we have deployed four principles, all of which align with our wider business strategy.

These principles are:



Think Global, Act Local

We have a global mindset, seeking to deploy consistent approaches to sustainability, while adopting a flexible delivery model which can be adapted for each of the locations we operate in.



Articulation With Company's Vision/ Mission, Values, & Strategy

We launched a new Vision/ Mission and corporate strategy at the beginning of 2025, and these were supported by new company values. We seek to align the work we do to generate value for customers and shareholders, with our sustainability goals. In other words, the two are mutually reinforcing, and one cannot be delivered without the other.



Go-Getter Mindset

One of our company values, being an Onclusive Go-Getter, is about being agile and adaptable, taking the initiative and anticipating the needs of others, solving problems - at pace - but learning continuously and focusing on improving.



Certified

As with any strategy, we need to measure our performance along the way, but we also need to understand how we compare to others and best-practice standards. As such, we seek to partner with organizations such as EcoVadis, a global platform that assesses and rates companies' sustainability performance based on their environmental, social, and ethical practices.

By pursuing accreditations linked to best-practice, and benchmarking ourselves against other businesses, we aim to once again embody our Go-Getter value in continuously improving.

# 2025 Summary of ESG Priorities

Our 2025 ESG roadmap is structured around one spotlight campaign and three objectives: We are proud to share the cause for this year, **Women of Onclusive**.

This cause underpins a whole host of initiatives we focused on during 2025. From policy updates, to equal pay, as well as the launch of mentoring and volunteering policies that cascaded across the whole company.

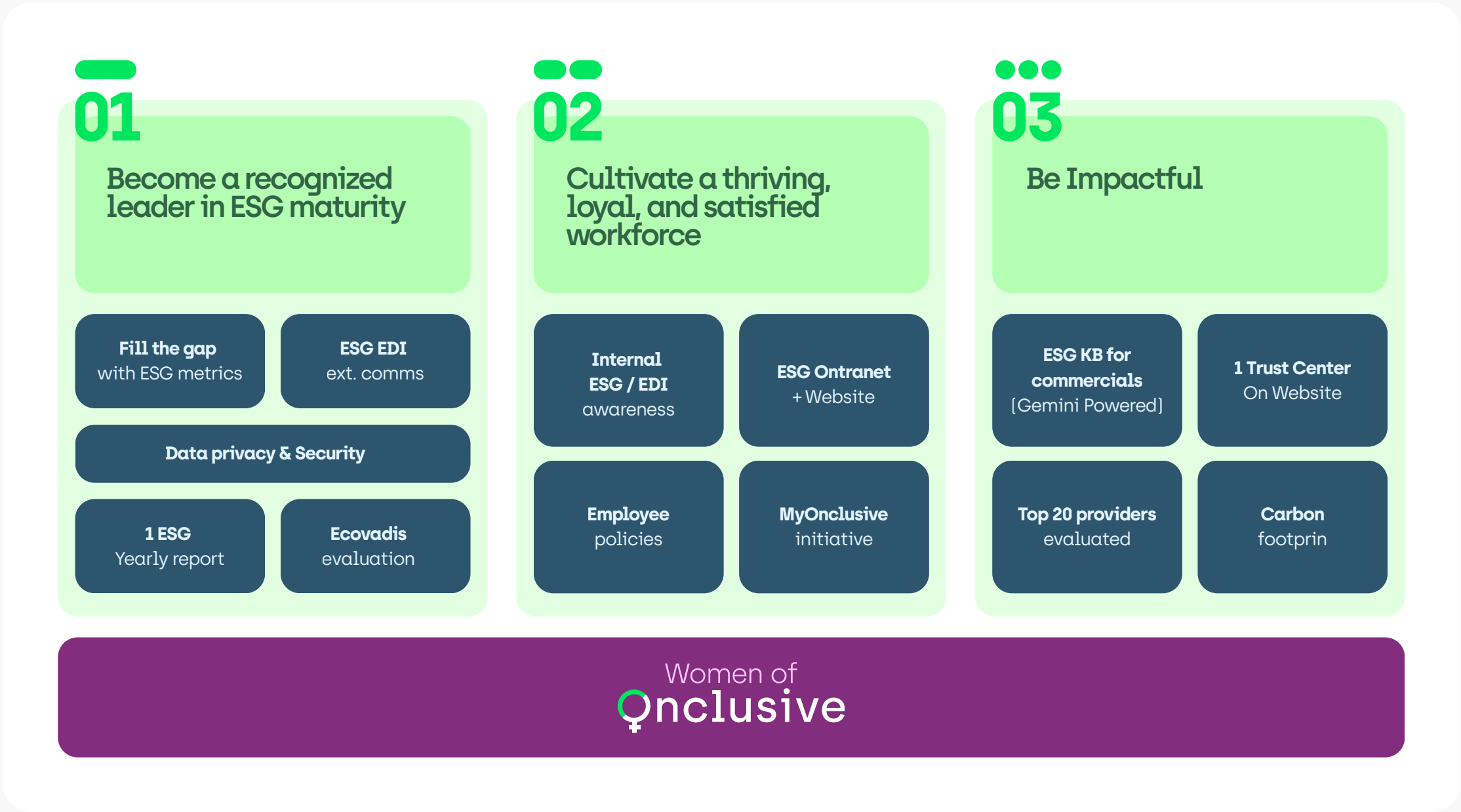
As we consolidate existing ESG initiatives from different parts of the company, we want to leverage all our efforts and become a recognized leader in ESG maturity.

But nothing can be done without the energy of each and every one of us. We all have a responsibility towards the collective at Onclusive.

Our second goal is focused on the Social aspects of ESG, as we seek to cultivate a thriving, loyal, and satisfied workforce.

Finally, we want to be impactful. More than just words, we want our actions to speak for us.

## Objectives:



# ESG Three-Year Roadmap Overview

Our three-year ESG roadmap is logically structured into three phases:

- 1





Understanding first where we stand
- 2

Improving and building the muscles on our metrics
- 3

Moving to more ambitious achievements

In 2026, we aim to make further progress. Our focus will shift from understanding to improving, as we seek to enhance and expand the scope of ESG data collected globally, track our progress more closely throughout the year, and strengthen our third-party assessments.

These consolidated foundations will position us for greater ambition in 2027, when we expect to see the results of our three-year commitments through the achievement of recognized standard certifications.

	MEASURE	IMPROVE	EXPAND
	FY25	FY26	FY27
 Reporting	Get the real picture Renew & expand Ecovadis evaluation Improve the ESG Knowledge base Deliver 1st ESG Report	Expand data collection Track progresses Improve ESG evaluations	Go for certification ISO 14001
 Environment	Get the carbon footprint Environmental Management Policy	Reduce carbon footprint Start internal awareness sessions	Align with 2050 Net Zero emissions program
 Social	Expand data collection Women of Onclusive Cause ERGs initiatives	Develop career development & training program Launch MyOnclusive	Improve social metrics [such as gender pay gap]
 Governance	Get the full spends breakdown [ESG related] Confirm UNGC commitment	Go for certification ISO 27001 AI Policy	Develop business ethics framework



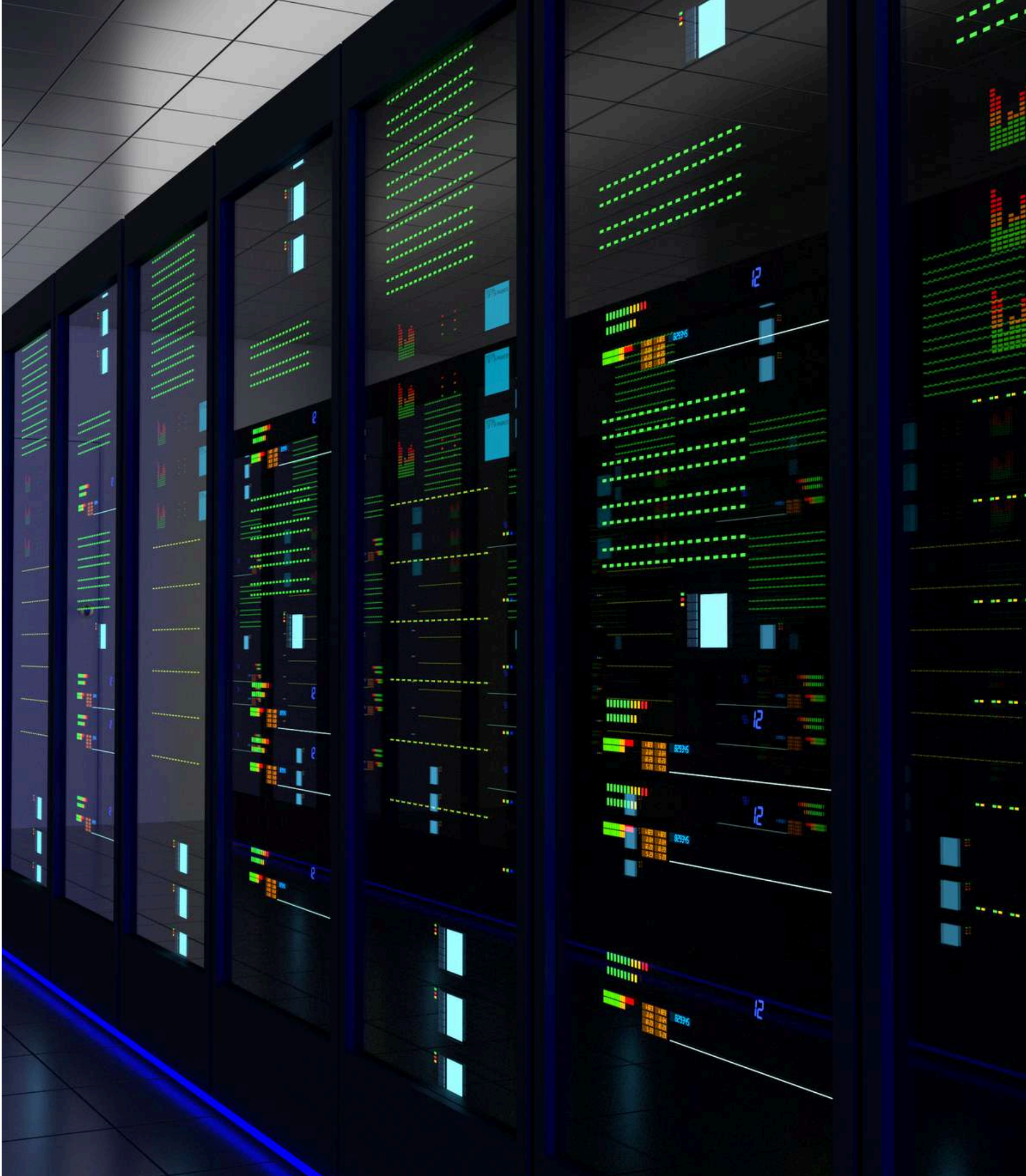
**Environmental**

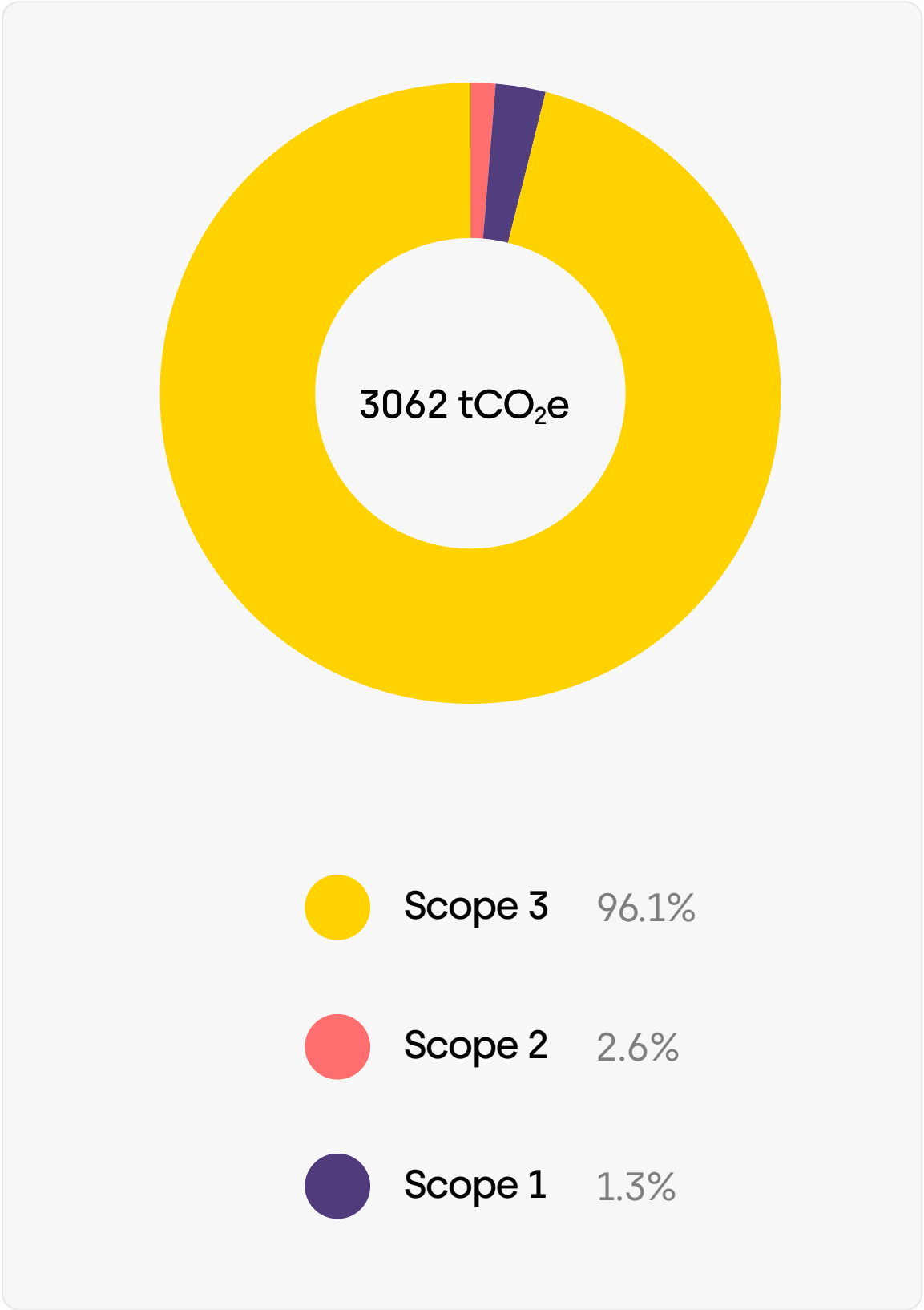
# Carbon Emissions Data

Our initial carbon footprint calculation adheres to the GHG Protocol, the world’s leading greenhouse gas accounting standard. Our reported figures cover Scope 1 and 2 emissions, and Scope 3 emissions derived from activities central to our business.

By annually measuring our carbon footprint, we will gain a clear understanding of our emission sources, which is vital for effective reduction. This first assessment forms the foundation for building a strong and impactful sustainability strategy.

	2024 Global Footprint
Total Emissions:	3062 tCO2e
Scope 1 (Direct Emissions):	40 tCO2e
Scope 2 (Energy Indirect):	81 tCO2e
Scope 3 (Value Chain):	2941 tCO2e
• Purchased Goods and Services (including data purchasing):	2,806 tCO2e
• Business Travel:	67 tCO2e
• Upstream Leased Assets (Data centers):	68 tCO2e





This first calculation, covering a full 12-month period from January to December 2024, will act as our baseline year for all future reduction targets. As this is the first time we have measured CO<sub>2</sub> emissions, we used a combination of direct data collection, spend-based methodologies, and limited extrapolations (5% to 25% on datacenters, expenses, and suppliers) to form our calculation.

This approach is permitted under the GHG Protocol, and helps ensure a strong representation of our environmental impact.

Scope 1

Our Scope 1 emissions, which represent the smallest contribution to our overall footprint, are derived primarily from the direct combustion of fuel used by our small, global fleet of employee-leased vehicles.

Scope 2

Scope 2 emissions represent indirect emissions from purchased electricity. Our calculation covers the electricity used across our global offices.

Scope 3

Our Scope 3 figure captures emissions from activities central to our digital and service-based business model:

**Purchased Goods and Services:** Emissions embedded in our wider supply chain, including the energy required to power our cloud-based data centres and IT infrastructure, purchased software, hardware, office supplies, and professional services.

**Upstream Leased Assets:** Emissions arising from the operation of leased data center facilities, where we occupy or lease dedicated space, servers, or supporting infrastructure not owned or controlled by the company.

**Business Travel:** Emissions associated with essential travel undertaken to deliver services, maintain client relationships, and support collaboration across our global operations. This includes air and rail travel, accommodation, ground transport, and related activities such as conferences, seminars, and business meals.

As the data quality for our value chain activities matures, particularly for cloud and supplier emissions, these numbers may evolve. We are committed to refining these figures in future reports to improve accuracy and allow for better targeted reduction initiatives.

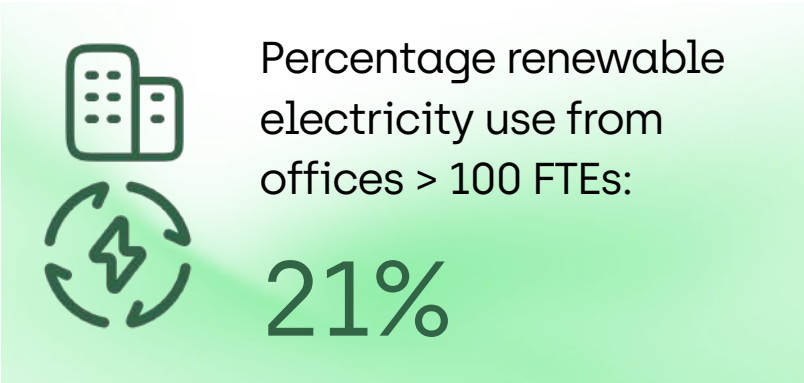
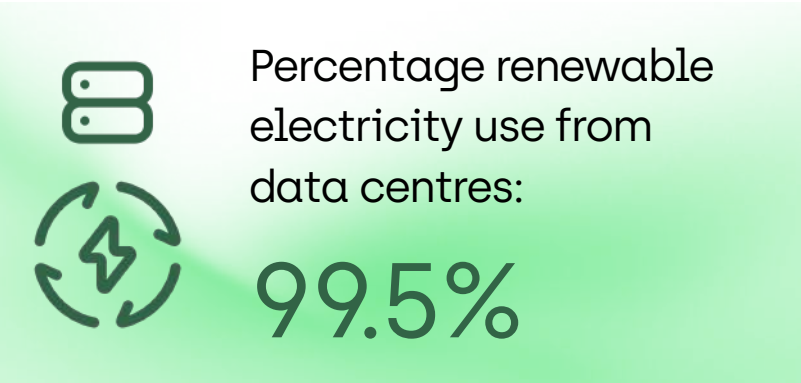
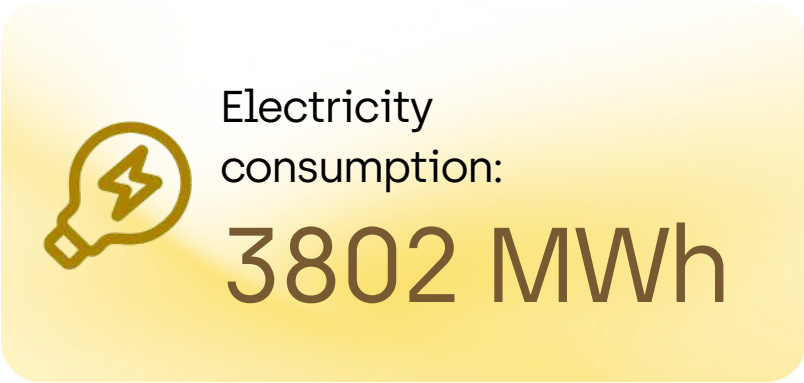
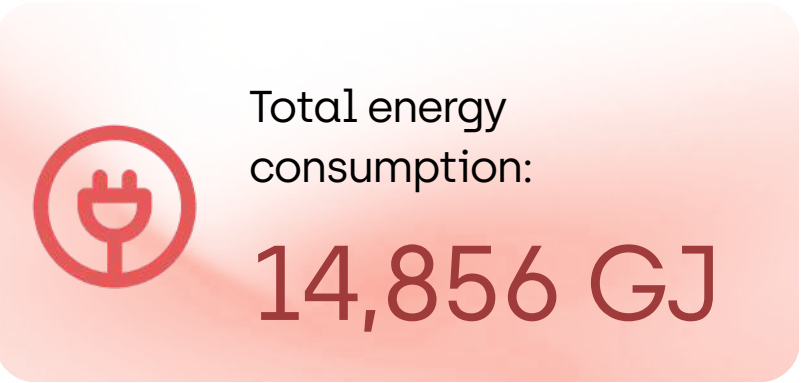


# Energy Use & Efficiency


2024 also represents our baseline year for tracking energy use and efficiency across most of our operations. Our energy consumption primarily arises from office operations and the IT infrastructure required to deliver digital services globally to our clients.

Establishing this baseline provides the foundation for setting meaningful reduction targets and monitoring progress in future reporting cycles.

## Energy Profile (Baseline 2024)




## Operational Energy Use



**Offices:**

Electricity used for lighting, heating, cooling, and equipment in our leased workspaces represents approximately a tenth (9.64%) of total consumption. When sourcing office space, we aim to select workspaces with sustainability credentials, prioritizing buildings with energy-efficient systems such as LED lighting, smart metering, and optimized heating and cooling. For example, our London office (until November 2025), is powered by 100% REGO-certified renewable electricity.



**IT Infrastructure:**

Due to the nature of our business, electricity consumed by data storage and processing, including cloud-based systems and data centres, constitutes 90.36% of our total use.

Taking into account the amount of electricity needed, we prioritize partnerships with providers that utilize renewable electricity and maintain high energy-efficiency standards, with 99.5% of the electricity from the data centers we use coming from renewable energy sources.



# Environmental Policy

Our approach to environmental responsibility is governed by our Environmental Management Policy, which formalizes our commitment to sustainability performance in our global operations and supply chain.

We recognize that our main environmental impact stems from resource use related to our cloud infrastructure and office energy consumption. Therefore, our policy mandates the monitoring and reporting of greenhouse gas (GHG) emissions (aligned with the GHG Protocol) and promotes energy efficiency, particularly by leveraging remote and hybrid work models.

Our commitment to limiting environmental impact is enforced through our Environmentally Preferable Purchasing (EPP) Policy, which integrates environmental criteria such as resource conservation, waste reduction, and support for the circular economy, into our procurement decisions.

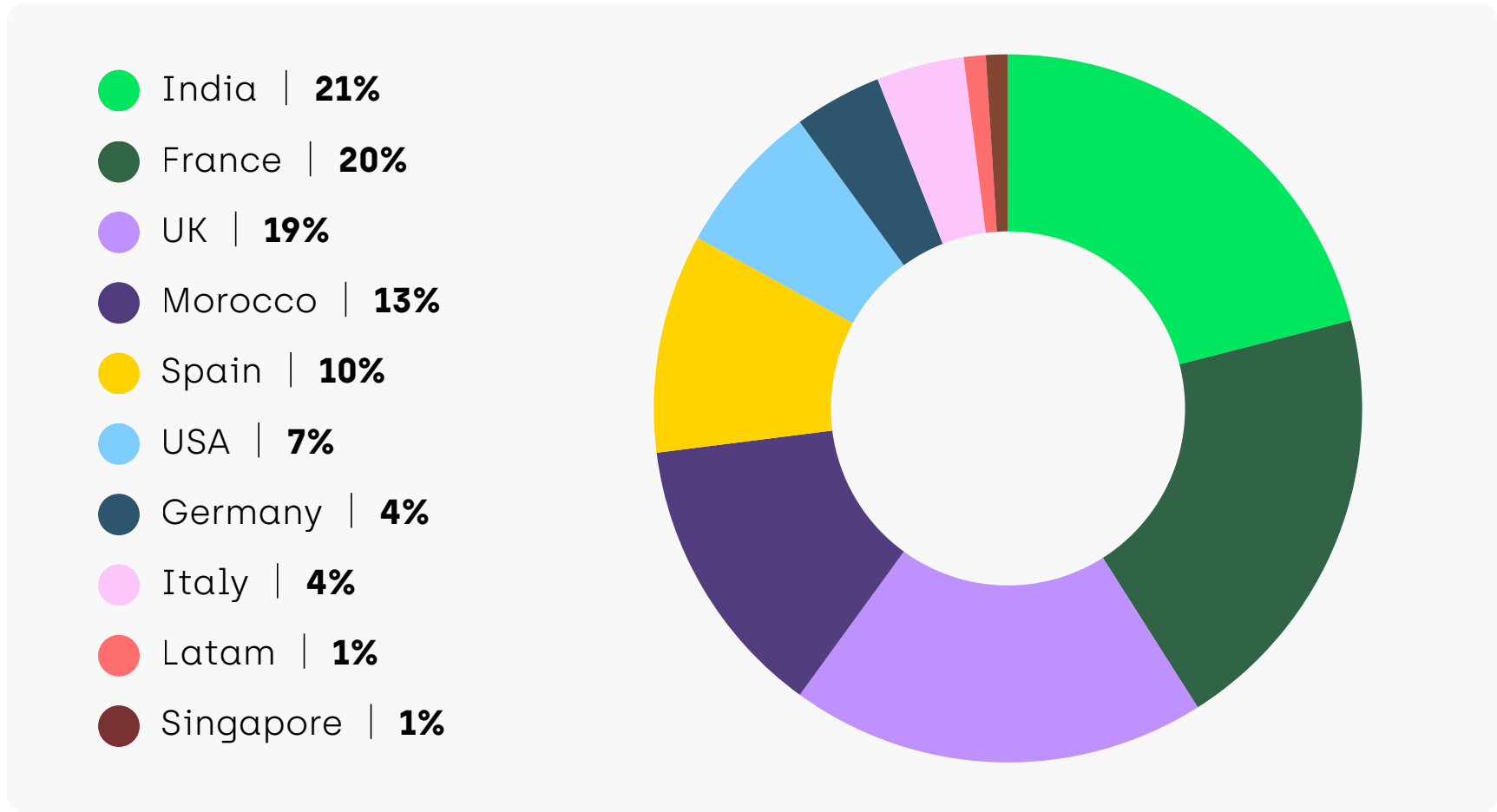




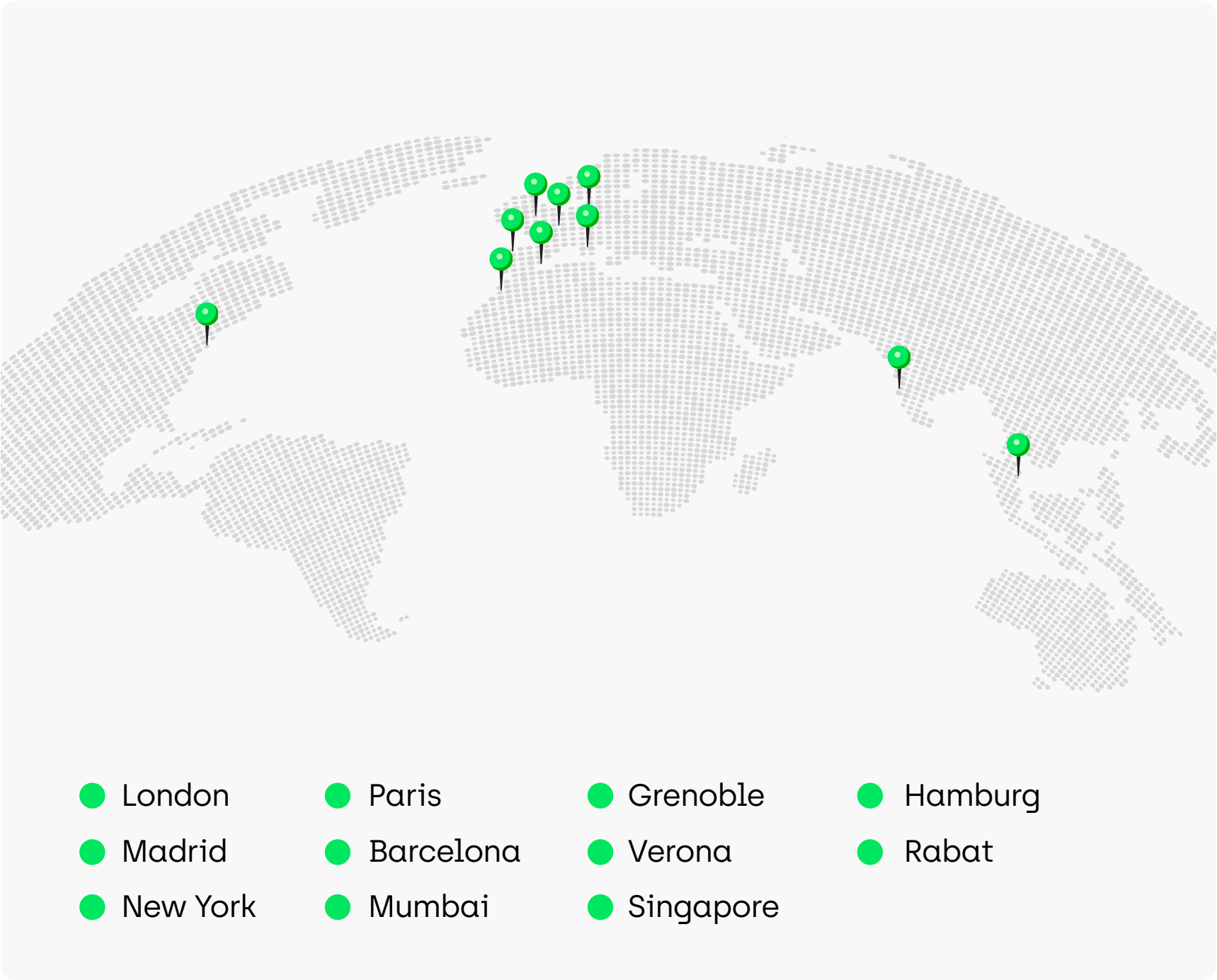
**Social**

# Workforce Overview

Our employee population stands at around 1150 people spread across the markets we operate in globally. The largest populations are in India, followed by France and UK, and Morocco, with all 4 countries covering 73% of the global workforce.



We operate globally from the office locations listed opposite. A large number of our employees work on a remote-first basis, only visiting their local or regional offices as required.



# Leadership & Company Diversity

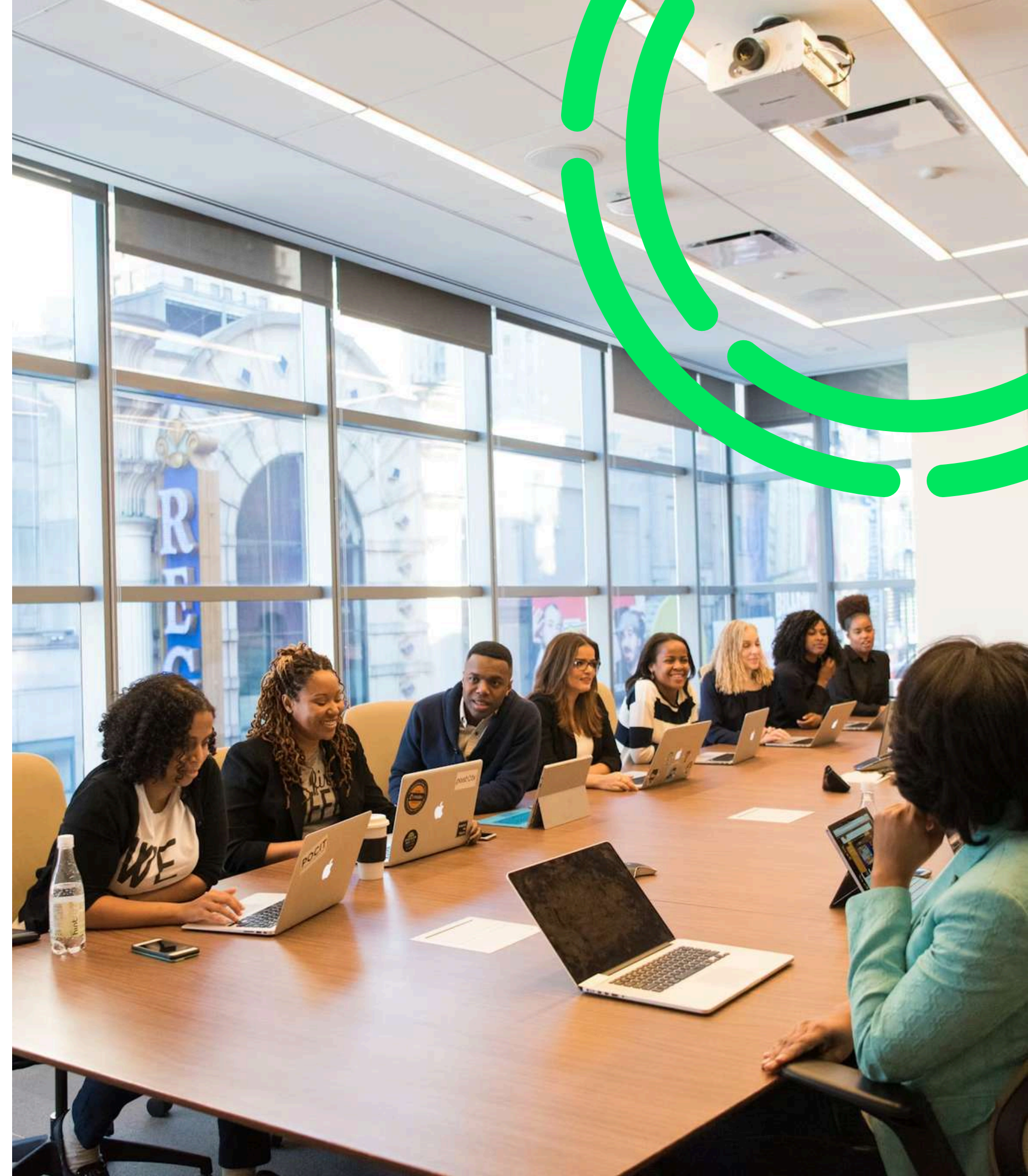
Onclusive is committed to providing a workplace for employees that is free of any discrimination and from abusive, offensive, or harassing behavior.

We comply with equal rights laws in all markets in which we operate and all Onclusive employees are expected to support an inclusive workplace by following our standard Code of Conduct.

Race, religion, national origin, color, sex, sexual orientation, gender identity or expression, age, or disability. We don't care about labels, only individuals and their exceptional talents.

This commitment is broadly mirrored in the make-up of our Executive Leadership Team, where **three of the eight** members at time of publication are **female**, and **three out of eight** members are from ethnically diverse backgrounds.

As a significant proportion of our employees are based in Europe, we do not collect ethnicity data in some markets, due to privacy and legal restrictions. In countries where this information is mandatory, for example in the US, we gather this data, ensuring we comply with equal rights laws in all markets that we operate in. However, as we continue to develop our internal reporting, we seek to further build our knowledge of our employee demographics and use this to inform future activity.



# Employee Well-being

## Health & Safety

The well-being of our people is a priority and is supported in several different ways, underpinned by our company Code of Conduct, health and safety policies, and various processes such as risk assessments, incident reporting, and employee training.

No matter where we work, we must meet safety standards and follow all laws, regulations, and company policies and procedures that apply to our work.

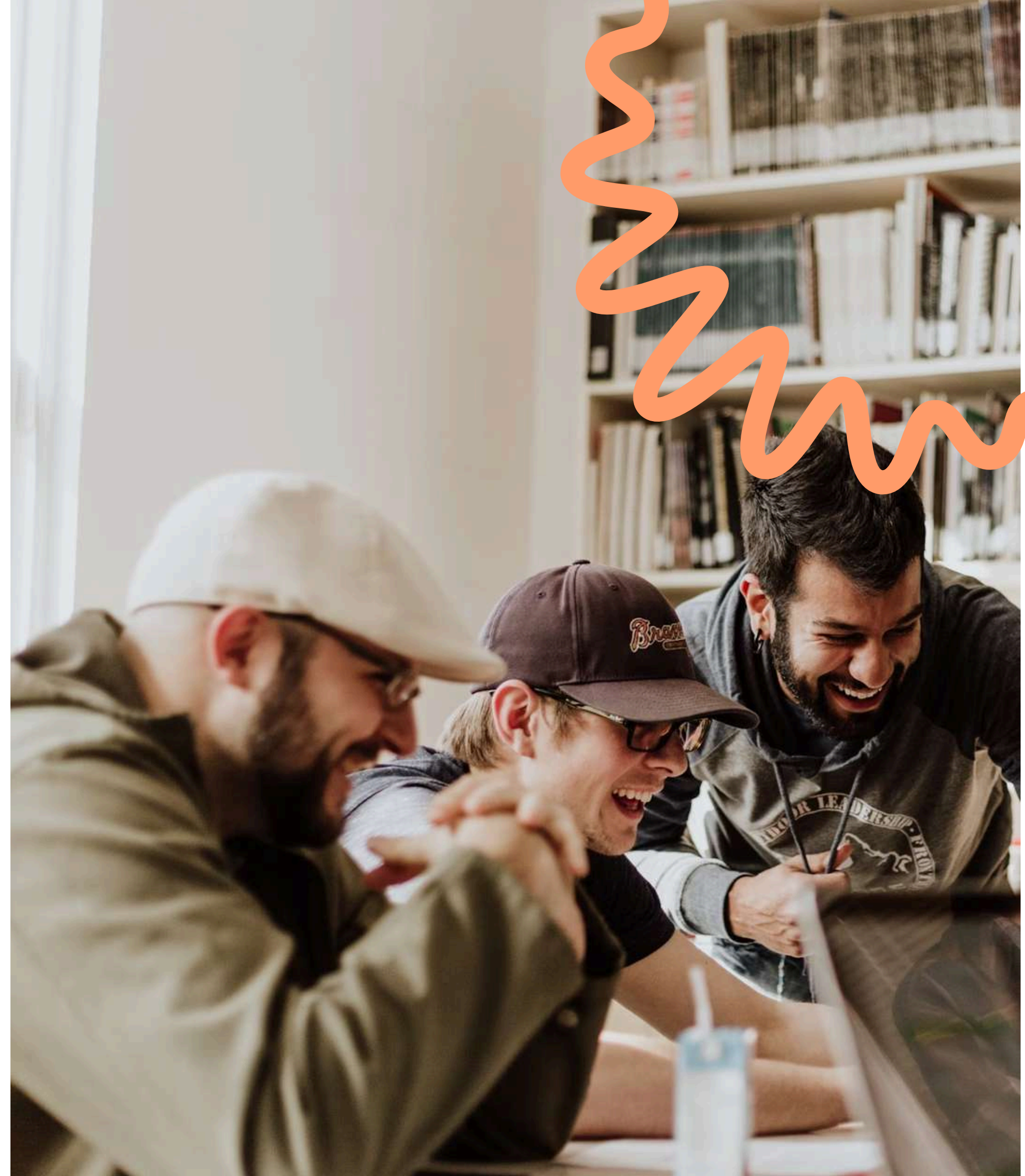
Maintaining a safe workplace also means ensuring that our actions do not create risk for ourselves or those around us. Onclusive does not tolerate any threatening or violent behavior in the workplace.

We are a global business that places emphasis on pleasing our customers. We recognize that one of the ways we can achieve this is by providing our employees with working conditions, equipment, and policies that support their well-being - because engaged and healthy people support customers better than those with low morale.

We measure employee engagement through a regular survey, undertaken by an independent consultancy. This provides us with a range of data to gauge the well-being of our people and inform the way we act to continually improve.

Across our globally distributed workforce, we embrace flexible working, allowing employees to work from home as well as from their local or regional office. Where practical, we encourage in-person meetings and events not only to build relationships but to also celebrate diversity across the workforce.

Diversity and Inclusion events held in 2025 have included several cultural and religious celebrations, where employees have shared their diverse cultures and backgrounds through food and events.



## Employee Networks

We place an emphasis on well-being through activities delivered by our Mental Health and Well-being Employee Resource Group (ERG) and internal communications, as well as the provision of tools and resources.

Sharing personal stories of how they have managed mental health and well-being, and encouraging others to make changes to their ways of working has been a consistent theme for the ERG this year, resulting in the launch of a new policy for employees called Well-being Wednesday. This provides every employee with a 30-minute window of time which they are encouraged to use during the week for well-being activities - from meditation to exercise and everything in between.

We also provide a global Employee Assistance Program (EAP), which is available 24/7, as well as the opportunity to subscribe for free to a mental health and well-being application, Unmind. This platform provides coaching and advice that can be tailored for different individuals and circumstances.

Supporting this are a range of Health and Safety training courses, which are assigned to employees on an annual basis.



## Whistleblowing

At Onclusive we believe everyone should feel comfortable to speak their mind, particularly with respect to concerns around ethics.

Our people managers have a responsibility to create an open and supportive environment where employees feel comfortable raising such questions. We prioritize tackling any business or personal behavior that is not right without fear or favor – whenever, wherever, and whoever is involved.

We operate an open-door policy, and employees are encouraged to address such issues with their managers or HR, as we believe most problems can be resolved swiftly through conversation.

If, for any reason, that is not possible or if an employee or third party is not comfortable raising the issue with a manager or HR, they may report issues via our whistleblowing process.

In these circumstances, we investigate all reported instances of questionable or unethical behavior. In every instance where improper behavior is found to have occurred, the company takes appropriate action.

We also commit to support anyone who reports an issue with any business or personal conduct, as well as preventing any retaliation they may face from raising the issue in the first place.



## Training & Development

During 2025 we appointed a dedicated training and development lead, who is building a comprehensive plan to be rolled out in 2026. This will include training offerings on well-being and related topics.

At present, our training and development offer is underpinned by a learning platform (Coursera), which allows employees to select and choose from thousands of training courses and topics.

With over 1,000 hours of training logged on the platform during this reporting period, we will continue to promote access to Coursera as we further develop our performance management program and establish individual learning and development programs for our employees.

Coursera is supported by the Onclusive Academy, which offers our people training on our products as well as related functional topics.

In addition, a mentoring program was launched in 2025 as part of our Women of Onclusive initiative. Following a six-month mentorship, we are expanding the program to all employees in 2026.

To better understand the impact of this activity, we have begun organizing the tracking of employee training. This year, we started with cybersecurity training and plan to expand this approach to other mandatory programs next year.



# Community Engagement

During 2025 we launched a volunteering policy to provide all employees with two days of work time which can be used to support a good cause or charity of their choosing. This has seen the best take-up in our Mumbai office, where colleagues have put their time to use with our partner, Sakhi for Girls Education.

## Case study

### Sakhi x Onclusive CSR Program 2025

In July 2025, Onclusive partnered with **Sakhi for Girls Education**, a non-profit organization supporting underprivileged girls, young women, and mothers from marginalized communities in Mumbai, India.

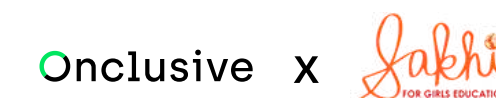
Supporting 75 students (ages 5-18) and 10 young leaders (ages 13-25), the initiative focuses on empowering beneficiaries through education support, youth empowerment, health and hygiene awareness, and community engagement.

It is the first CSR program / sponsorship that Onclusive has participated in and consists of a monthly donation of food, health, and hygiene kits which ensure basic needs are met, therefore enabling participants to focus on education and growth.

The partnership also includes engagement activities which foster leadership, career readiness, and community development. Onclusive has provided Sakhi leaders with laptops to enhance their ability to support others.

Launched under the umbrella of Onclusive's first global ED&I initiative, Women of Onclusive, the program was led by our India team and the Onclusive Mumbai CSR Committee volunteers. It has helped to build stronger employee engagement while demonstrating Onclusive's role as a responsible corporate citizen with local impact and global alignment to our ESG commitments.

As the first such initiative, we are learning continuously from activities and feedback (both Onclusive and Sakhi), to ensure a lasting impact, and a framework that can be activated across similar partnerships in the future.



"As part of Onclusive's Global ED&I program, we are delighted to have partnered with **SAKHI**. During a visit to the foundation, we witnessed the older girls leading with confidence - mentoring the younger ones and fostering a strong cycle of growth. Despite modest surroundings, the energy, resilience, and community spirit were inspiring. Through this collaboration, we are committed to amplifying their opportunities and supporting their journey towards a life of confidence, resilience, and hope."

**Mahesh Kumar**  
Country Manager  
Onclusive India



# 2025 Initiative: Women of Onclusive

## Letter from Chief People Officer

At Onclusive we are lucky to have a good mix of diversity at our Executive Leadership level, and gender diversity across the business is broadly 50:50.

But we know that empowering employees can lead to multiple benefits, both in helping them to own and develop their careers in a way that works for them, and also in the impact it can have to their wider families and communities.

And so it was with this in mind, that we decided to focus some of our ED&I activity on creating a completely new initiative which would support multiple activities during 2025, all with the aim of helping to develop the Women of Onclusive.

I've been delighted that my executive leadership peers are so eager to support the initiative, and that we were able to move quickly to establish a program of events and governance model which have allowed us to deliver so much in such a short space of time.

Starting with a marquee event for International Women's Day, we have celebrated diversity and championed women in our workplace, providing opportunities for learning and development, and a safe space for frank and honest discussions.

One of my favorite aspects of the initiative is the work we've been able to support in India, through our sponsorship of Sakhi for Girls Education. The participation of our team in Mumbai has been phenomenal, and it's wonderful to see the impact the program has on the women and girls it supports.

All of the activities launched under the initiative will continue to run once our focus period ends and we move into a new calendar year. I'm thrilled with the progress we have made, but even more delighted that these will continue to deliver value for our female employees in the future, and I'm hopeful we can create a lasting impact.



**Kate Waterhouse**  
Chief People Officer



# Letter from Chief Operations Officer, Sponsor of Women of Onclusive 2025

As someone that has spent their career in technology and operations functions, I am acutely aware of the challenges often faced by women at work, and I believe it is important for leaders - especially male leaders - to be proactive allies and advocates.

I was therefore keen to take a lead and sponsor this initiative, helping to raise awareness across Onclusive of the value that a diverse employee population can bring to an organization like ours.

Looking across the activities that have been delivered under the program during 2025, I'm in awe of the commitment of the colleagues who have made them happen. These people have given their time over and above their day jobs to support the many activities that you can read about below.

It's testament to their dedication and our company values that we simply need to back their efforts, rather than plead for involvement, and I think this is reflected in the outcomes we've delivered for our female colleagues.

I've been fortunate enough to mentor two female colleagues under the mentorship program launched this year, and it's been an honor to help with their development while seeing them grow and flourish.

I've also been captivated by the spotlight interviews that have supported some of the Lean In sessions we've held. For me, they have been among the most interesting and informative of any such discussions on the topic of gender equality from across my career.

I'm so impressed with the fearlessness which our speakers have approached these, talking with honesty and vulnerability about some difficult experiences while sharing their learnings with others to raise awareness and reinforce solidarity.

As Kate mentioned, I too am thrilled at the amount we've been able to achieve this year and look forward to continuing to support the activities.



**Max Brierley-Jones**  
Chief Operations Officer



## Women of Onclusive - Shining a light on gender equality

The ESG 2025 roadmap for Onclusive included this spotlight cause ‘Women of Onclusive’ spear-headed by the HR team and championed by the Chief of Operations, which was launched on International Women’s Day.

The aim of this project was to deliver a series of initiatives across the year, with a project team consisting of HR colleagues, talent acquisition and enthused volunteers. The initiatives were focussed on making improvements within Onclusive for female colleagues across all markets, to showcase the talents of the women at Onclusive and commit to financially support a cause for women outside of Onclusive.

### **The initiatives were as follows:**

- Sakhi Education for Girls sponsorship
- Showcasing the Women of Onclusive
- Relaunch the Lean In community
- Learning Pathways
- Mentoring Programme
- Gender Pay Gap Analysis by market
- HR Policy changes



Sahki for Girls Education sponsorship

Onclusive created a partnership with Sahki for Girls Education in Mumbai, which focuses on empowering women and girls around topics such as education support and youth empowerment, health and hygiene awareness, and aspects of community development.

Donations of laptops and goods have been made to the charity, and our colleagues have met with the team. Onclusive’s ongoing support will strengthen the educational journey of young female leaders and inspire others. Six Onclusive team members made this initiative possible, benefiting 15 women.

Spotlight interviews

This series of short video interviews highlight the successes of women at Onclusive. They are a catalyst for our Lean In session discussions and the learning pathways we have launched.

The Spotlight interviews have encouraged women from across Onclusive to join the Lean In community, and to feel more comfortable discussing challenges in the workplace that specifically impact women.

LEAN IN relaunch

Our Lean In employee resource group initially launched in 2023. After a period without any activity, we relaunched the community under the Women of Onclusive initiative as a key pillar of our support for women and fostering global connections.

Lean In is a global organization, combining a world-class leadership curriculum with the power of camaraderie and community (leanin.org).

We held a reintroduction event to help colleagues, new and old, to understand the purpose of the sessions and the wider support network, ahead of several topic-focused events throughout the year.

These sessions are held virtually via video calls and consist of two parts; a speaker session where a female leader shares their experiences on a specific topic, followed by a practical learning-based workshop where employees are encouraged to work together and learn from one another.

Alongside these sessions, Lean In members at Onclusive participate in a global Google Chat channel, which has become one of the most active among our ED&I conversations.

Relaunching this network has helped provide a safe space to discuss work-related challenges for women.

The Lean In community fosters global connection and engagement across Onclusive. Speaker sessions and workshops regularly attract over 50 participants from all regions, creating an inclusive space for learning and growth. The community now includes more than 90 members spanning five regions, 13 countries, and every department, demonstrating its reach and resonance company-wide.



Sophie Penanguer



Roxane Papagiannopoulos

Female-focused learning pathways

A series of Coursera learning pathways were developed to support women across Onclusive. The learning pathways focus on addressing challenges most commonly experienced by women in the workplace and are aligned with the topics covered by the Lean In program. These focus areas include subjects such as overcoming self-doubt, imposter syndrome, and developing negotiation skills.



Mentoring program launch

The mentoring program was launched to female colleagues in the middle of 2025 as a pilot initiative. Over 30 female employees signed-up to be mentored and positive feedback was received from both mentees and their mentors at the mid-point of the program.

Following the initial six-month pilot, which focused exclusively on coaching and development for female colleagues, the program is being launched to all colleagues as part of our wider learning and development offer.

Gender pay gap analysis

As our employee data is brought together under a new HR management system, we are now in the process of analyzing the pay gap between our male and female employees.



Policy enhancements

Within the Women of Onclusive project, our focus has been to identify changes that deliver benefits to female employees.

The process involves analyzing the current environment, benchmarking against regional competitors, conducting interviews with employees and management and gap analysis. This is followed by policy writing and review with employees, HR, and management and against legal obligations.

Family friendly policies covering working from home, bereavement, and maternity have been improved for our teams in Morocco and Singapore, and are to be launched in APAC locations in early 2026.

We were delighted that a number of colleagues in our Rabat office in Morocco were able to spend more time with their families upon the birth of children during 2025, as a result of the extension of maternity pay to six months - far beyond the standard 14 weeks provided under Moroccan law.

Implementing these improved policies makes Onclusive a more attractive employer from a talent and retention perspective, and feedback from our Moroccan employees has been emphatic, as shown by these quotes.



"I want to emphasize how much these HR initiatives have a concrete and lasting effect on employee motivation and engagement. It's difficult for me to summarize the wonderful impact this initiative has had on me, but in my case, the teleworking arrangement after my maternity leave has had a very positive impact, especially since I don't live in Rabat and I don't have anyone who can take care of my little one. This initiative has allowed me to continue working while ensuring that I am there for my child during his first year. This flexibility has given me a real balance between family and professional life, and has allowed me to enjoy a precious period of time watching my child grow up every day."



"The family friendly policy made a huge impact in my life when I became ill. The local HR team was so supportive, and my team covered my workload with remarkable solidarity. During this time, the health insurance covered most of my medical expenses, which greatly reduced the financial burden of treatment. Thanks to the policy, the company's support, and a genuine culture of compassion, I was able to focus entirely on healing, proof that workplace empathy and social protection can truly help save lives."



# Equity, Diversity & Inclusion

## Letter from The ED&I Chairperson

I joined Onclusive shortly before the business came together in its current state, at a point where there was no formal approach to Equity, Diversity, and Inclusion (ED&I). Pockets of the organization had historically undertaken activity through the legacy businesses they had previously been part of, but we did not have a program or any clear goals.

As with so many new companies formed from constituent parts, there was already a familiarity with ED&I, it just needed someone to get the ball rolling.

Looking back, I realized that we were missing this crucial part of our culture and I was keen to start a Black Network. As soon as I asked to do so, I was thrilled to get the backing to set one up. After some initial success, this led to requests for other networks, and I found myself helping to coordinate these.

Fast forward to today, and I'm thrilled to lead the global ED&I program we now have in place, with Employee Resource Groups (ERGs) that range from mental health and well-being to LGBTQIA+ and gender diversity.

As the saying goes, from small acorns grow mighty oaks. And while our activity starts to blossom, I look around and now see several ERGs which are supported by dozens of passionate Onclusive colleagues from across the globe.

We've come so far, especially in the past 12-18 months, which has seen the launch of new Employee Resource Groups and fresh life breathed into others. We've held some truly inspirational awareness raising discussions and speaker events, and launched our flagship initiative approach - this year focused on gender inclusion.

We have also formed partnerships and sponsorships with organizations that are making a real difference in the world.

For me personally, the journey continues: I'm delighted to represent Onclusive with a seat on the Race, Ethnicity, & Equity Board (REEB) at the PRCA - the world's largest professional body for public affairs, PR, and communications.

As a woman of color, I feel incredibly lucky to work for an organization that is prioritizing ED&I, especially in a global environment where the trend is currently in the opposite direction. This couldn't have been achieved without the backing of our leadership team, who have supported our activity both financially as well as in person.

### From blossom to full bloom

We know that we still have a long way to go on our journey, but I am so proud of the progress we are making as we continue to mature our approach.

In the past year, we've used insight gathered from our employee surveys to align our efforts with what's happening across Onclusive, responding to feedback from employees.

Our Women of Onclusive initiative has given us an umbrella to deliver so much around gender, and has led to a rejuvenated Lean In employee network that delivers discussion panels and practical workshops. These are supported by an incredibly active online community within the business.

During this period we've also been given further support from our leadership team to put new structure and governance in place to help us succeed. Again, having this level of support from senior leaders has helped us set formal goals and targets for the first time, while creating an ED&I council made-up of colleagues who lead our internal networks.

We are building on this strengthened foundation with an audit of our activity, which will support a new strategy in 2026. The audit is being undertaken by Barbara Phillips, who I'm fortunate to work alongside at the PRCA, and is yet another example of how the business is prioritising ED&I as a core part of its commercial strategy.

### Looking to the future

For me, ED&I is at the heart of how Onclusive operates, underpinned by strong values and a culture that prioritizes diversity of all kinds.

We have huge aspirations for how we can continue to embed and expand our approach, helping employees find a sense of belonging.

We'll continue to position ED&I as a cornerstone of our culture, aligning even more closely with Onclusive's business objectives to achieve more together, driven by the belief that inclusivity leads to richer outcomes for all.

Thank you for reading.



**Shade  
Chinsman**  
Global ED&I Chair



# Review of 2025 ED&I Achievements

Alongside the Women of Onclusive project, which has been highlighted on previous pages, the colleagues who support our Employee Resource Groups and the ED&I Council have helped to deliver an amazing array of events and activities which span our geographic locations and encourage participation from teams across the globe.

Across 2025, the most notable awareness dates marked, and internal events delivered by our ED&I Council and ERGs were:

- Diversity Dialogues podcast launch
- US Black History month
- International Women's Day
- Mental Health Awareness month
- Juneteenth
- Pride
- UK Black History month
- Diwali
- Breast Cancer Awareness month
- Movember



# Diversity Dialogues Podcast

In conjunction with the launch of our Women of Onclusive initiative, and International Women's Day in March, we published our first internal podcast, Diversity Dialogues.

The series delivered nine episodes during 2025, featuring frank and honest conversations among colleagues as we explored a range of ED&I topics.

These sessions have been striking in terms of the vulnerability our colleague-guests have displayed, helping to raise awareness, share learnings, and encourage positive action.

The authenticity of the podcasts has garnered incredibly positive feedback from our employees, and we are very proud of the way we've been able to cover sometimes difficult topics in a non-judgemental and supportive way.



# Mental Health & Well-Being

We have reinforced the importance of supporting mental health and well-being throughout the year, with our ED&I activities focused primarily on Mental Health Awareness Month in May and Movember in November.

Alongside personal storytelling through panel discussions and our internal podcast, we shared tips and resources with colleagues to help them manage their well-being. We also continued to provide free access to Unmind, an app-based platform that provides coaching and support to encourage better mental health.

One of the biggest outcomes of our May activity was the addition of a new Well-being policy for all employees. This gives colleagues 30 minutes each week to step away from work and focus on activities that support their well-being.

During Movember, we launched a campaign to encourage colleagues to participate by growing a moustache or committing to getting active during the month. We also hosted a speaker panel with the MenWalkTalk charity, exploring the challenges of toxic masculinity and how to overcome them while supporting better mental health.

To recognize World Mental Health Day (October 10), all employees were encouraged to take a dedicated mental health day to rest, reflect, or reconnect. This initiative aligned with our continued focus on psychological well-being and work-life balance. Alongside the day off, resources and tools were shared to help employees manage stress and build emotional resilience.

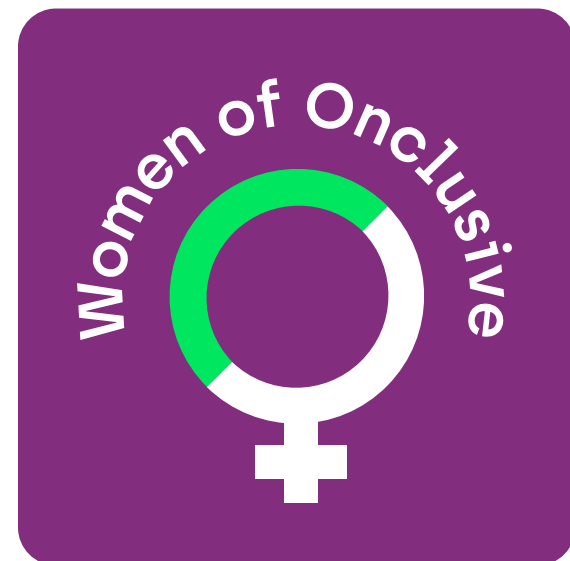


# International Women's Day

## What was delivered



- Onclusive colleagues across the globe celebrated International Women's Day (IWD) with in-office events and a global video conference which featured transatlantic rower, Victoria Monk, who was among a team of record-breaking women to row the Atlantic Ocean unassisted in 2024.
- This speaker session was the highlight of our IWD celebrations, providing inspiration and engagement, and setting the tone for the Women of Onclusive initiative by featuring a female role model.
- Other activities included launching our internal ED&I podcast: Diversity Dialogues, colleagues pledging to support women in the workplace, and an externally published blog with testimonials from our employees.



# Juneteenth

On 19 June, Onclusive proudly went red in honor of Juneteenth - commemorating the emancipation of enslaved African Americans and celebrating freedom, resilience, and progress.

Externally, our Onclusive logo was updated in red across platforms to symbolise unity and remembrance. Over three days, we shared informative and reflective LinkedIn posts to amplify awareness of Juneteenth’s significance and reaffirm our collective commitment to equity and inclusion.

This was reflected internally through a number of internal communications highlighting the history and importance of the day.

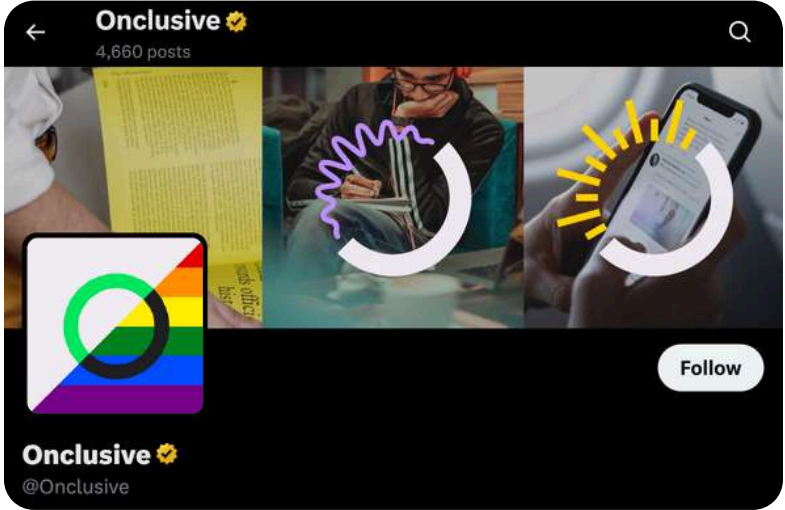


# Pride

Our Onclusivity ERG led an inspiring celebration during June, embodying inclusion, visibility, and allyship. Our Pride Month speaker, **Charlie Martin** - British racing driver and transgender rights activist - shared her journey of navigating a male-dominated sport and using her platform to champion inclusion and equality.

The virtual session drew nearly **200 participants** from across all Onclusive markets and was supported by in-office celebrations in London, where colleagues and allies came together for an unforgettable night of laughter and solidarity.

The month concluded with a Diversity Dialogues podcast titled “Allyship in Action: Moving from Words to Impact”, highlighting real-life stories of advocacy and authentic allyship within our community.



# UK Black History Month

Celebrated in the U.S. during February, and in other markets including the UK during October, we have created meaningful activities which honor Black culture, creativity, and contribution.

In February we hosted a virtual poetry workshop with Terrell the Artist, bringing together employees to explore art as a form of empowerment and storytelling.

Our internal communications during the month highlighted Black love, resilience, and heritage - including a special “Love Quotes” campaign and an educational post on the history and significance of Black History Month.

In October, Onclusive celebrated UK Black History Month under the theme of Power and Pride, spotlighting Black excellence, culture, and community. The month kicked off with a powerful speaker panel exploring the politics of fairness and equity in the workplace, followed by an engaging Diversity Dialogues podcast episode featuring three colleagues.

Our London office came alive with a vibrant carnival-inspired speaker panel event and luncheon that honored the diversity and creativity within our teams. Across global offices, colleagues were encouraged to support Black-owned businesses, share media recommendations, and engage in meaningful conversations about heritage, resilience, and representation.

These efforts reflect our ongoing commitment to learning, reflection, and allyship across all markets.



# Diwali

To honor the Festival of Lights, we hosted warm and joyful Diwali celebrations across our offices, highlighting the meaning of Diwali as a time to reflect on light triumphing over darkness - a fitting reminder of the power of inclusion and shared joy within our global community.

Employees were invited to participate in traditional dress, share sweets, and enjoy cultural music and decor that illuminated the spirit of unity and renewal.

In recognition of the festival's cultural and spiritual significance, employees celebrating and observing Diwali were encouraged to take annual leave to share time with loved ones.

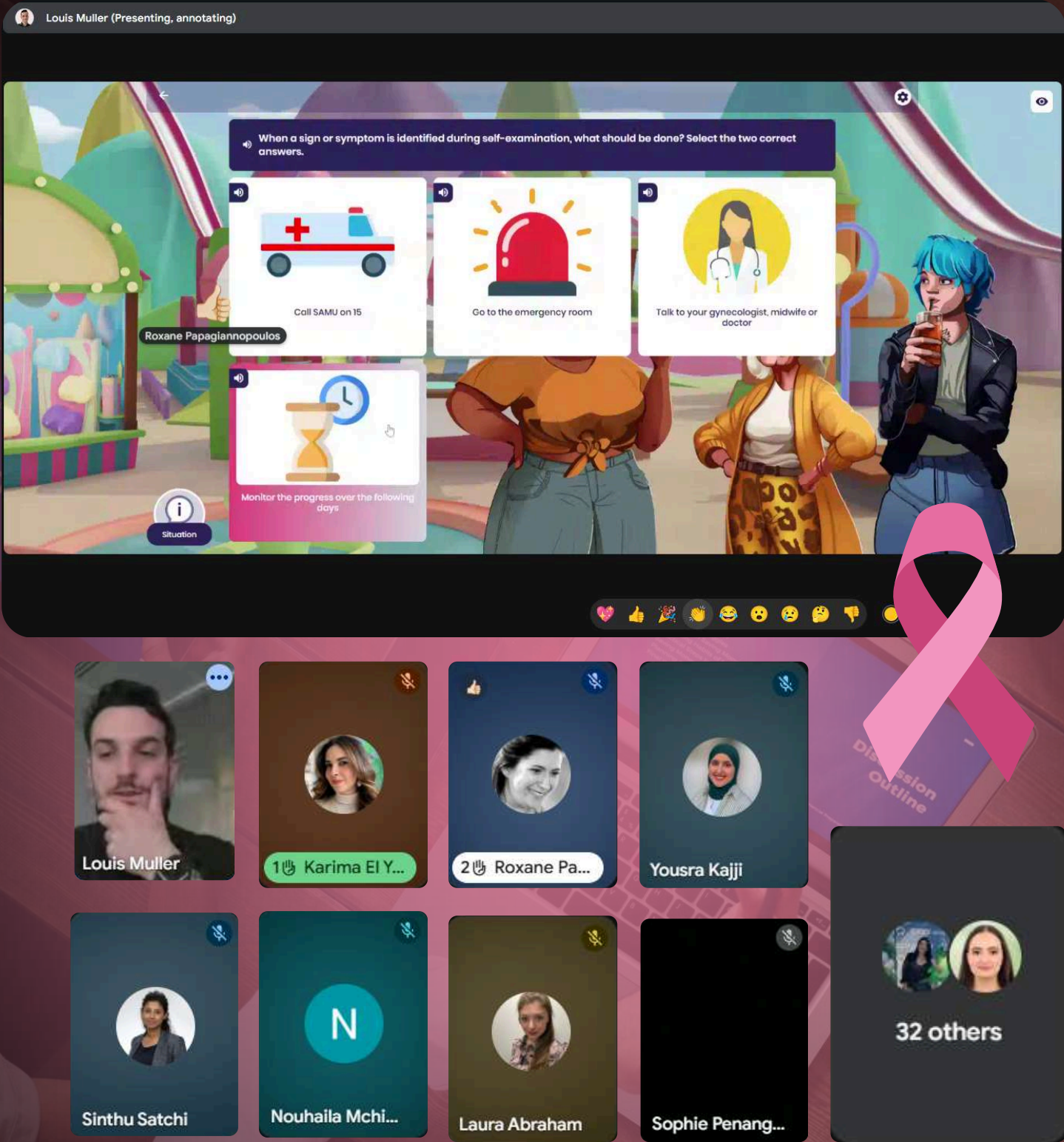


# Breast Cancer Awareness Month

Throughout October, we joined the global movement for Breast Cancer Awareness, fostering education, empathy, and action.

Led by colleagues in our Paris office, we hosted a virtual speaker session with survivors and health professionals who shared insights on early detection and wellness practices, and our teams around the world took part in an awareness quiz.

Employees also shared personal stories and reflections on resilience, reminding us of the strength in collective care. The initiative reaffirmed Onclusive’s commitment to health, well-being, and advocacy - within and beyond the workplace.





# Governance

## Letter from The Chief Financial Officer

### ESG as a driver of long-term value

Having spent my career in technology with some of the leading companies in their fields - organizations that were built on robust and solid governance - I have seen first-hand how integrity, inclusion, and responsibility form the foundation of sustainable success.

Working as a non-national in several countries and cultures over the past two decades, and even today living in a foreign land yet not feeling like a foreigner, I deeply value the role ESG plays in fostering environments where everyone can belong and thrive.

ESG is therefore not merely a corporate framework, but a personal conviction; a commitment to ensuring that future generations will not face the same barriers that others or myself once had to overcome.

For investors, clients, and stakeholders alike, ESG has become a key indicator of resilience and future readiness. At Onclusive, we view ESG not merely as a responsibility, but as a core driver of sustainable long-term value and financial performance.

ESG is fully embedded in how we operate, make decisions, and grow. We believe that the environment and nature are key elements to consider in every action we take. Equality is not just a word, but a necessity in our business; shaping how we collaborate, respect, and empower our teams.

Likewise, ethical compliance is not a formality, but a fundamental basis of exchange - a reflection of our integrity and our commitment to doing what is right. We recognize that health is the most valuable asset we have, and we believe we have a responsibility toward the well-being of our employees and communities.

Cultural diversity is an asset, not a constraint. It enriches our perspectives, strengthens innovation, and allows us to operate with empathy and understanding across all markets. At Onclusive, we see ourselves as a trusted partner to our stakeholders - working collaboratively to create sustainable impact and long-term value for all.



**Bernd Stangl**  
Chief Financial Officer








# Data Privacy

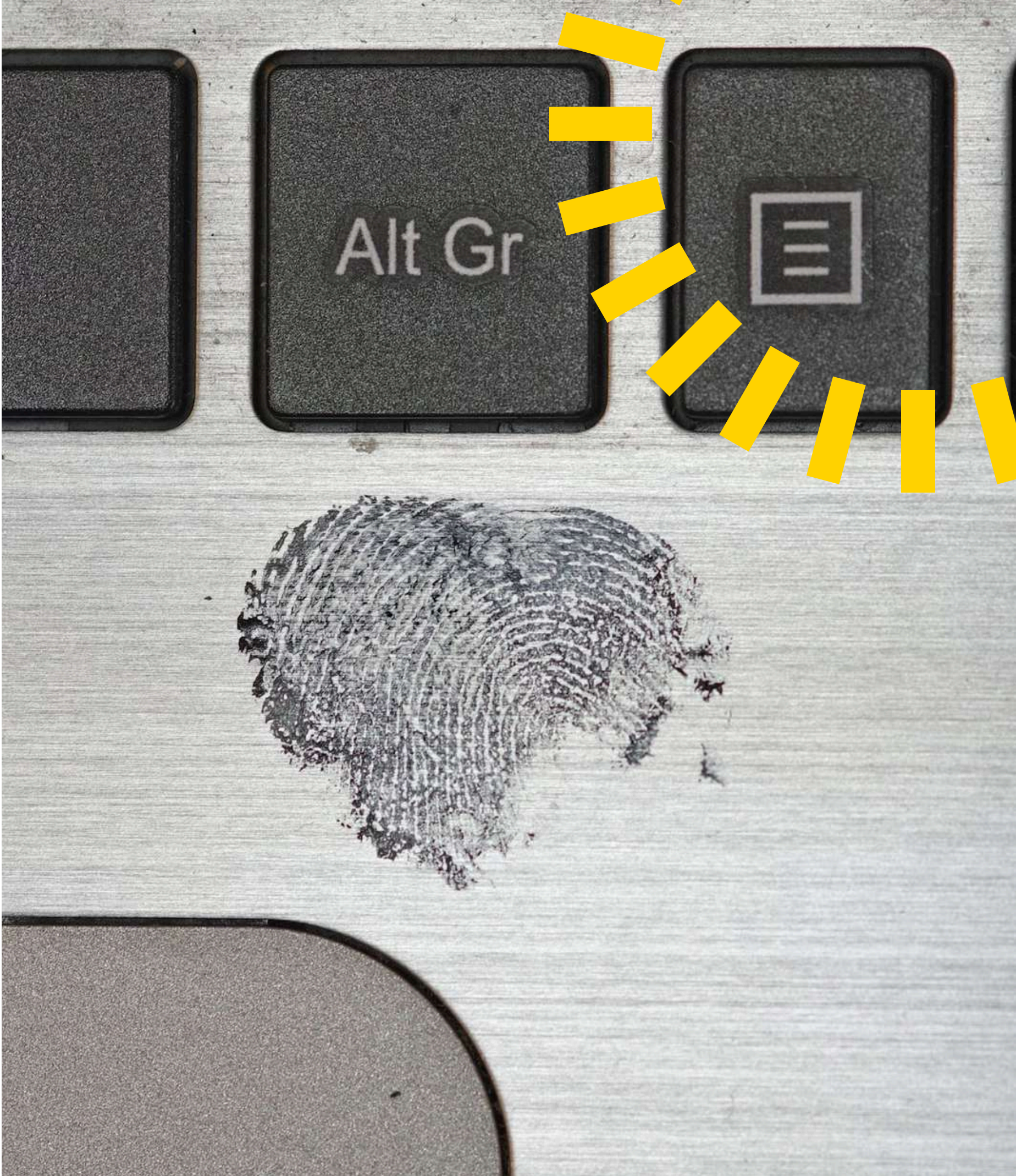
Protecting client and stakeholder data is fundamental to how we do business, and we operate under the principle that trust is earned through transparency, accountability, and continuous improvement.

Our internal Information Security and Data Protection program is designed to safeguard information throughout its lifecycle - from collection to processing, storage, and deletion - while aligning with international standards and regulations.

Our operations comply with global and regional regulations, including the EU GDPR, UK Data Protection Act, and emerging frameworks such as CCPA, NIS2, and the EU AI Act.

**Core controls include:**

-  Defined governance and accountability for data protection
-  Regular audits of processing activities and vendor compliance
-  Privacy impact assessments for new tools and projects
-  Secure data-retention and deletion standards
-  Vendor risk assessments prior to any third-party onboarding



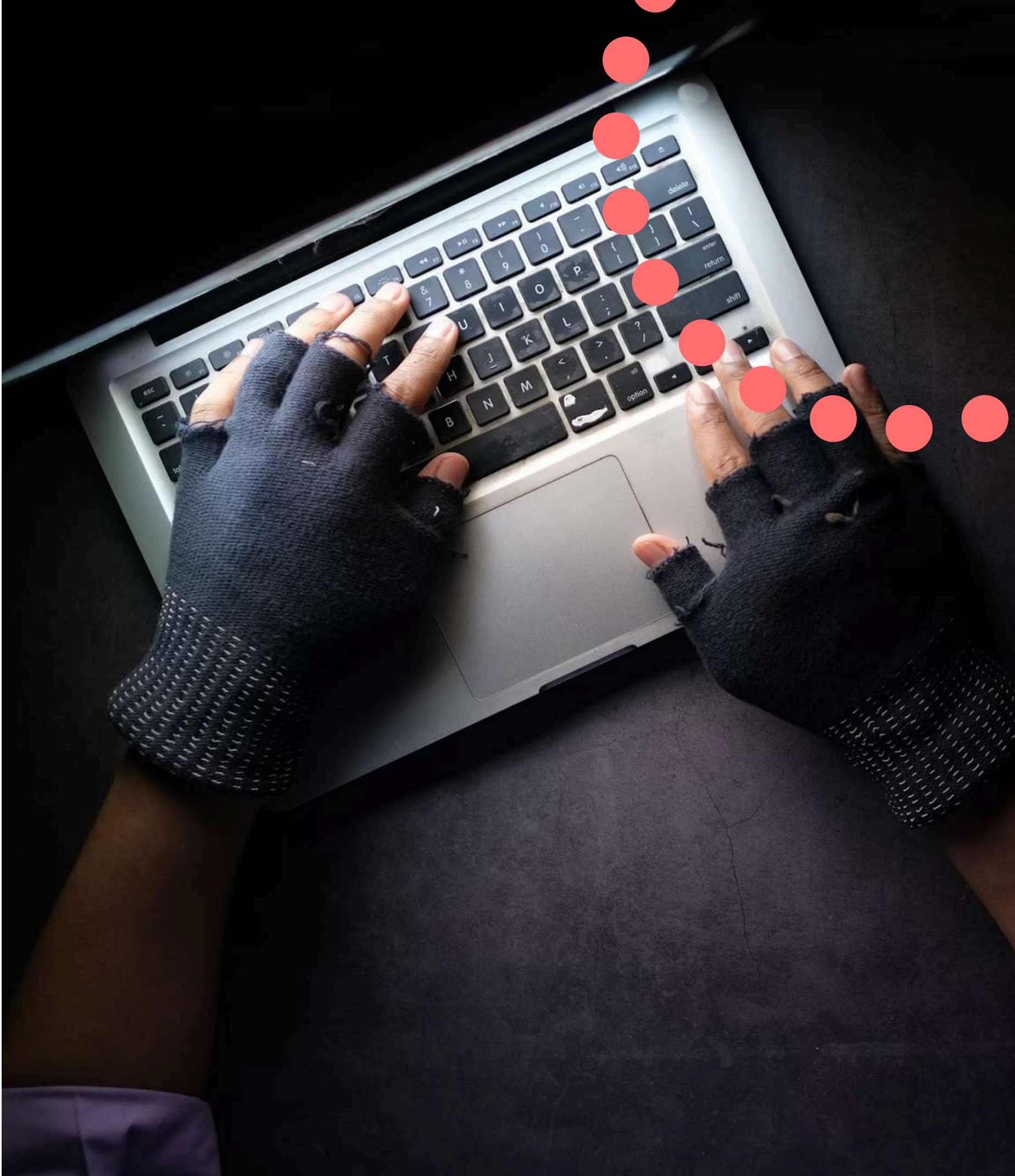
# Cybersecurity

We apply a centralized program-management model to our cybersecurity, with regional security leads ensuring consistent global execution.

This structure maintains standardized SLAs, unified quality-assurance processes, and 24/7 coverage where required, and is backed by regular cross-regional reviews which guarantee alignment with emerging threats and best practices.

Key risk domains & mitigation

Risk	Mitigation
Delivery consistency across regions	Centralized oversight with regional hubs, standardized processes, and continuous QA.
Cybersecurity & data protection	ISO 27001-aligned controls (scheduled for 2026), SOC 2-certified infrastructure, MFA, regular penetration testing, and incident-response SLAs.
Data privacy & regulatory compliance	GDPR-compliant framework, DPO oversight, privacy-by-design approach, consent management, and secure data-handling workflows.
Scalability & resourcing	Flexible global talent pool, predefined surge protocols, and on-call support across time zones.



Cybersecurity awareness & training

Building a strong security culture is essential in an increasingly connected world, where malicious operators target data and seek to exploit weaknesses.

This is why all our employees complete mandatory annual training which covers cyber hygiene and phishing awareness, secure data handling and confidentiality, GDPR principles and privacy-by-design, and incident reporting and escalation.

We’re pleased that completion rates during this period remained consistently high, with targeted refreshers provided additionally for teams managing sensitive client data or critical systems.

New joiners are required to complete this as part of their Onclusive on-boarding program, and company-wide targeted and randomized phishing simulations are undertaken throughout the year, supplemented with ongoing micro-learning to reinforce awareness.

ISO 27001 & continuous improvement

In 2025 we launched a company-wide ISO 27001 certification initiative to formalize our Information Security Management System (ISMS). This process:

- Validates adherence to international best practices
- Embeds continuous monitoring and improvement mechanisms
- Provides measurable assurance to clients and stakeholders

The certification is scheduled for completion in 2026, supported by annual internal audits and management reviews.

Looking ahead

Our goal is to sustain a resilient, privacy-first digital ecosystem that protects data and strengthens stakeholder confidence.

Through continued investment in technology, governance, and people, we ensure information is handled responsibly, securely, ethically, and transparently - every day.

We are also willing to share policies and audit reports with our clients to demonstrate the level of compliance and commitment to information security and data protection within our Group.



# Copyright & Intellectual Property

Our business is built on the indexing and analysis of press and social media content - materials inherently protected by copyright.

As such, we view the protection of intellectual property as a core responsibility, integral to both our business model and our contribution to the media ecosystem.

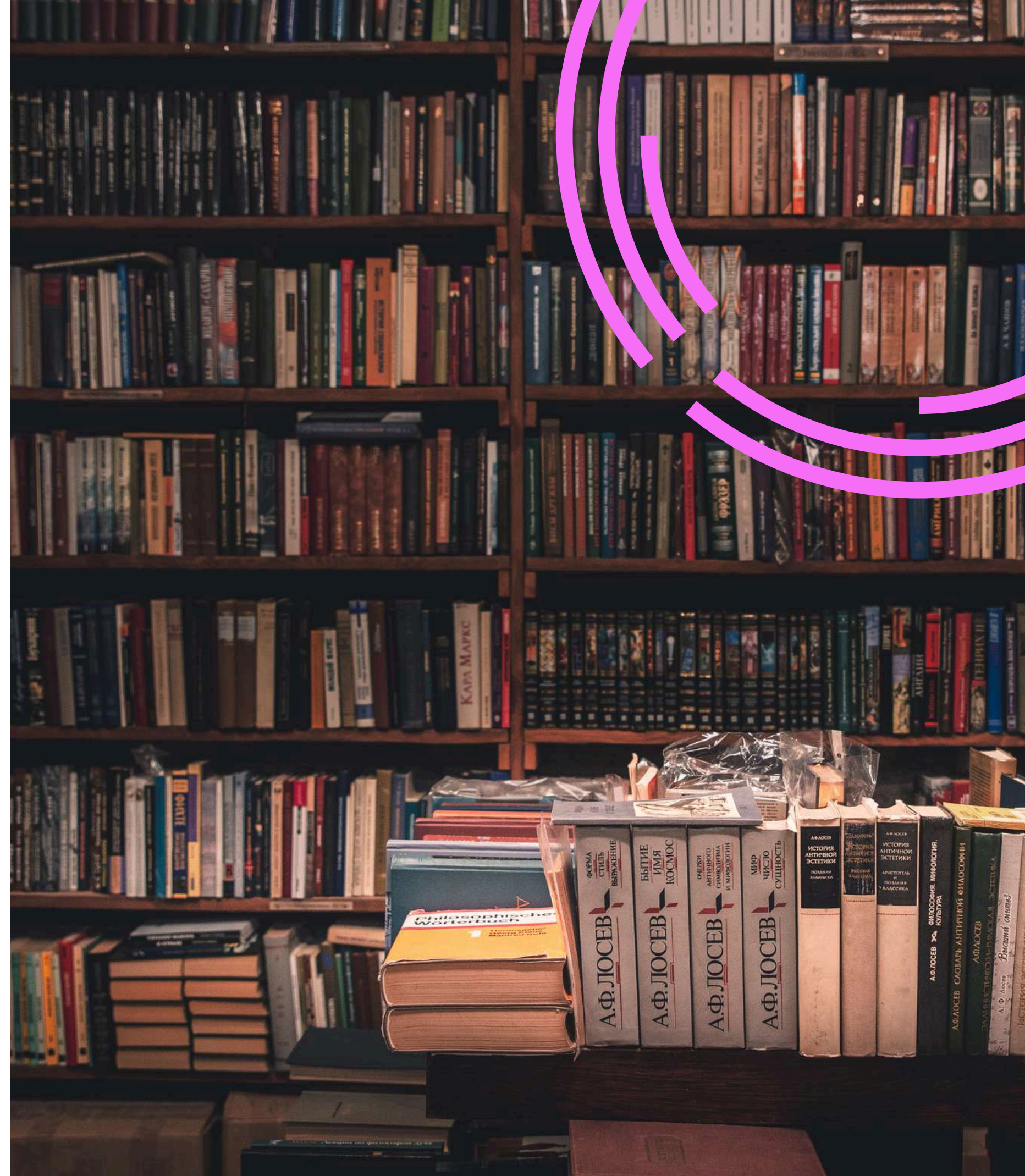
Due to the international nature of our business, this is often complex, with differing regulations in each market. To manage this complexity, we have copyright specialists in each geography we operate in, and we are long-standing partners with many Collective Management Organizations (or RROs) who exist to license their member partners' content.

These include organizations such as the Copyright Licensing Agency (CLA), NLA Media Access (NLA), Newspaper Licensing Ireland (NLI), Centre Français d'exploitation du Droit de Copie (CFC), CEDRO, Promopress (FIEG), and PMG Presse-Monitor.

We also enter into direct contracts with certain important publishers to maintain an exhaustive repertoire of content for our clients. Examples of these include The Financial Times and the International New York Times.

We continue to learn and further our knowledge by remaining members of federations including FIBEP, AMEC, and PDLN. Individuals across our copyright team are members of these and other bodies such as the UKMMA (UK Media Monitoring Association) which represents media monitoring organizations in the UK.

We also act as Secretariat of FeVeM (France) and are members of AFEC (Spain) and IVDM (Germany). These organizations predominantly work together on industry issues including copyright.



Our approach to protecting IP and copyright include the following:

- **Contractual Partnerships:** We work closely with publishers, news agencies, and platforms under formal partnership agreements to ensure the legitimate use of all indexed content.
- **Fair Compensation:** We implement licensing and redistribution mechanisms that directly support fair remuneration for content creators and publishers.
- **Responsible Innovation:** We design and deploy indexing and AI solutions that respect intellectual property rights, balancing broad access to information with the protection of creative works.
- **Transparency:** We maintain clear communication with clients on content usage terms and provide guidance to help ensure their own compliance with copyright regulations.

Concrete actions & engagement

We actively demonstrate our commitment to copyright protection through tangible actions such as:

- **Industry Collaboration:** Active membership of professional organizations and working groups such as FIBEP and AMEC, contributing to the development of fair and transparent media monitoring practices.
- **Stakeholder Dialogue:** Regular engagement with copyright collecting societies, publishers’ associations, and regulatory authorities to align with evolving legal frameworks and expectations.
- **Internal Governance:** A dedicated Copyright & Compliance Committee oversees all licensing agreements, content usage policies, and employee awareness initiatives.
- **Audits and Monitoring:** Periodic internal and external audits ensure our processes remain compliant with intellectual property standards and contractual obligations.
- **Training and Awareness:** Annual training programs reinforce best-practices across teams involved in content handling and data management.

By embedding these principles and actions into our governance framework, we promote a more responsible digital ecosystem - one where technological innovation advances hand in hand with respect for the fundamental rights of creators and publishers.



# Supplier Code of Conduct

## Responsible sourcing

Onclusive is committed to working with suppliers that uphold high standards of ethical conduct, environmental stewardship, and social responsibility. Our Supplier Code of Conduct establishes the minimum standards required for doing business with Onclusive globally.

Our Supplier Code of Conduct specifies several critical areas unique to the media intelligence industry. Suppliers must agree to and meet these mandatory standards to mitigate risks. These standards require strong measures for data integrity and security, and proactive adherence to ethical standards for any artificial intelligence systems used in providing services.

Furthermore, the Code strictly prohibits modern slavery and forced labor, while upholding internationally recognized human rights and ensuring fair labor standards, including the right to collective bargaining and non-discrimination.

To work with us, suppliers must adhere to strict anti-bribery and corruption policies, and responsible sourcing is embedded directly into our procurement process.

This collective approach helps us drive continuous engagement and transparency across our value chain, aligning our partners with recognized frameworks such as the UN Global Compact and ISO 14001.

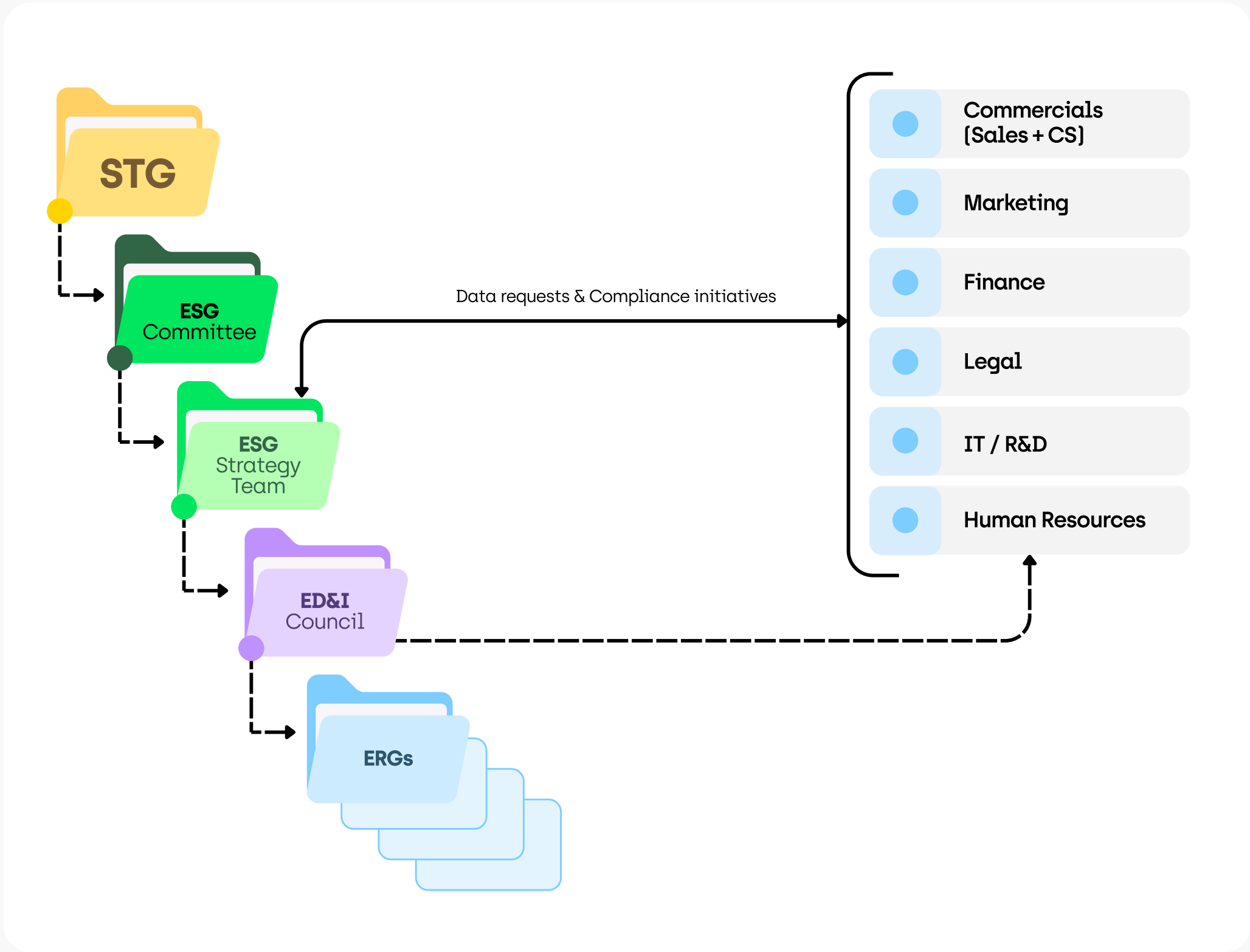


# ESG Governance Structure

Our ESG Governance model outlines the way we integrate our strategy into ways of working, and manage the delivery of our objectives.

- The ESG Committee defines the strategy and key initiatives, sharing them with our ESG Strategy Team and ED&I Council members, as well as the Onclusive leadership and private equity owners, Symphony Technology Group, STG.
- Once approved, the ESG Strategy Team and ED&I Council develop plans and objectives to achieve the strategy, reporting on progress to the ESG Committee.
- These groups work with our Employee Resource Groups (ERGs) and business functions to coordinate relevant activities, implement policies and changes, and request data that can be shared with the Committee and Leadership/Owners.

In the past year, the number of ERGs has increased, both in number, as well as in membership, to include colleagues in each of our key global markets.



# Compliance & Validation

## Regulations & directives

While Onclusive does not currently meet the full criteria for mandatory reporting under the EU Corporate Sustainability Reporting Directive (CSRD) or the UK Streamlined Energy and Carbon Reporting (SECR) regulations, we recognize their importance in global compliance.

Our intention is to ensure that our internal data collection, governance structures, and disclosure principles are CSRD-aligned in the near future. Furthermore, we track our UK energy use in line with SECR requirements.

By proactively embracing these standards, we demonstrate our commitment to transparency and ensure we are well positioned for any future regulatory changes.

## Policies

Our commitment to ethical operations and legal compliance is shown by a comprehensive suite of corporate policies across all three ESG pillars.

Governance and ethics are formalized by our Code of Conduct, Anti-Corruption and Anti-Bribery Policy, and Anti-Money Laundering Policy, with accountability ensured by our whistleblowing and fraud reporting mechanisms.

Socially, our Modern Slavery and Human Trafficking Policy, and Human Rights Policy are supported by Equity, Diversity and Inclusion, and Anti-Discrimination and Harassment policies which highlight our commitment to a fair workplace.

Furthermore, the importance of data to our business is secured by an Information Security Policy, more of which is shared in this report.

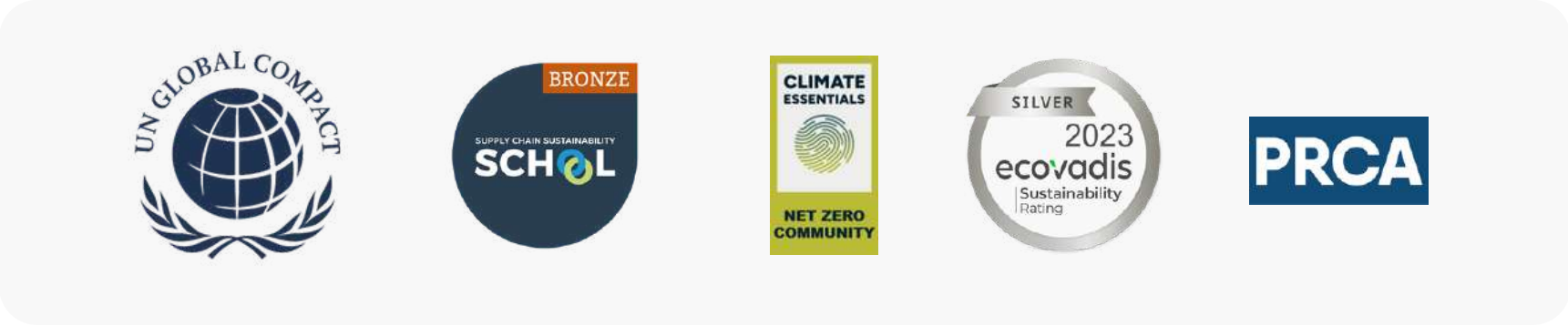
## External ratings & commitments

Our ESG framework is built upon internationally recognized standards set by the United Nations. We have been a signatory of the United Nations Global Compact (UNGC) since 2023, anchoring our core policies to its 10 universal principles.

Onclusive is in the early but active stages of external validation for our ESG performance. Two of our group entities currently hold EcoVadis certifications and we are aiming to achieve a comprehensive global EcoVadis evaluation to present a unified sustainability assessment across our entire international footprint.

We are a member of the Supply Chain Sustainability School, which helps to embed best-practices and continuous learning throughout our procurement processes. We have also recently joined the Climate Essentials Net Zero Community, alongside a growing network of businesses committed to collaborative climate action.

Moving forward, as our data and activities mature, we are committed to pursuing more formal evaluations of our performance to gain further external validation and ensure continuous accountability to all our stakeholders.



\*Silver EcoVadis = Reputational Intelligence France SASU / 2024 Evaluation

# Appendices

## Carbon Footprint Calculation Methodology

### Overview

This is Onclusive's first year conducting a full carbon footprint assessment. The approach adopted follows the principles of the Greenhouse Gas (GHG) Protocol Corporate Accounting and Reporting Standard and applies a combination of spend-based and activity-based calculation methods, depending on data availability. The organizational boundary was defined based on operational control, encompassing major offices, data centers, and business activities within the reporting year.

### Data sources

- Spend-based data: Used for the majority of global operations. This data was derived from internal expense reports, invoices, and procurement records.
- Activity-based data: Applied where directly measured information was available, such as for specific offices and data centres with recorded electricity consumption.

### Emission factors

Emission factors were sourced through Climatiq, an emissions data platform that aggregates verified datasets from internationally recognized sources, including but not limited to: UK Government: DEFRA / BEIS, U.S. Environmental Protection Agency (EPA), European Environment Agency (EEA), Open-IO Canada, EXIOBASE.

Each spend or activity record was matched to the most relevant emission factor category available, with preference given to geographically specific and sector-appropriate data.

€
 Currency Standardization

- All calculations were standardized in euros (€).
- Financial data reported in other currencies were converted to euros using the average 2024 exchange rate sourced from exchange-rates.org.
- Similarly, emission factors originally expressed in other currencies were adjusted using the same average exchange rates to ensure consistency between spend data, emission factors, and resulting CO<sub>2</sub>e outputs.


 Calculation approach

- **Spend-based calculations:** CO<sub>2</sub>e = Spend (€) × Emission Factor (kg CO<sub>2</sub>e per €).
- **Activity-based calculations:** CO<sub>2</sub>e = Activity Data (e.g., kWh, litres, km) × Emission Factor (kg CO<sub>2</sub>e per unit).
- In cases where essential activity data, such as energy consumption (kWh), was unavailable, the formula was rearranged to estimate energy or activity levels using known spend and applicable emission factors.
- Estimations and extrapolations were applied where data were incomplete or unavailable, in accordance with the flexibility permitted by the GHG Protocol to ensure boundary completeness. To address identified data gaps, Scope CO<sub>2</sub>e figures were proportionally inflated (by 25% for supplier data and 5% across all other factors). This conservative adjustment was applied to account for potential underreporting and to present a more accurate and representative estimate of the organization’s total carbon footprint.


 Assumptions & limitations

- Spend-based approaches introduce a degree of uncertainty, as emission factors represent sector averages rather than precise supplier-specific impacts.
- Some estimations and extrapolations were necessary due to data gaps in certain categories.
- Reported figures should therefore be interpreted as indicative baseline values rather than exact measures of carbon emissions.


 Continuous improvement

This initial assessment establishes a baseline from which improvements can be made. As our ESG strategy continues to mature, we aim to progressively improve data granularity and quality, record a greater proportion of activity-based inputs, and strengthen alignment with international best practice in future reporting cycles to enhance methodological robustness and yearly comparability.


 Disclaimer

While reasonable efforts have been made to ensure the accuracy and completeness of the information contained in this report, Onclusive makes no representations or warranties as to its accuracy, completeness, or reliability and accepts no liability for any errors or omissions. Certain ESG information may be based on estimates, assumptions, or data derived from publicly available sources, and methodologies, data sources, and interpretations may vary over time or between providers. This report is provided for informational and transparency purposes only and does not constitute, and shall not be construed as, legal, regulatory, investment, or contractual advice, nor does it create any legal or contractual obligations.

Onclusive

## UNGC Reference documents

See our official [UNGC page](#)



**United Nations**  
Global Compact

## Contact

For any request about Onclusive ESG Report or Activity,  
please contact us at: [esg@onclusive.com](mailto:esg@onclusive.com)