

Beacon Platform Inc.

# Environment, Social, & Governance Policy

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**Document Change History**

Date	Change	Change Summary / By
December 14, 2023	V1.0	Initial version / D. Mara Lowenstein
March 24, 2025	V1.1	Head of Governance, Risk & Compliance, periodic review (no changes required).

**Document Approval**

Date	Name	Role
December 22, 2023	Raj Atwal	Head of Governance, Risk & Compliance
April 08, 2025	Nicole DeMaise	Senior Commercial Counsel

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# Environment, Social, & Governance Policy

## Policy Maintenance

The Senior Commercial Counsel is responsible for the maintenance of this Policy.

This ESG Policy was last updated on 24 March 2025 and is subject to change, as Company considers necessary or appropriate.

## ESG Statement

### Overview

At Beacon Platform Incorporated (the “**Company**”) and at our wholly owned subsidiaries (“**Subsidiaries**”) our Environmental, Social and Governance (“**ESG**”) Policy covers a broad spectrum of Company activities, including the management of our relations with our employees, investors, partners, suppliers, and clients. It reflects our commitment to conducting business in a way that is socially, environmentally, economically, and ethically responsible, as well as aligned with Company values.

This ESG Policy applies to our business operations and transactions, in a manner consistent with our duties to our stakeholders and other legal and regulatory requirements. We review our ESG Policy approach and the ESG Policy-related processes on a regular basis to ensure that inherent risks are effectively managed.

When entering into relationships or transactions, we may consider information about many factors, including, among others, those that are considered ESG, such as exposure to regulation or litigation, labor relations, human rights, safety, reputation, governance practices, compensation, reporting and disclosure, community relations, energy costs, and climate impact.

## Training

All Company and Subsidiaries employees receive onboarding to all Company policies and procedures, as well as access to their relevant Employee Handbook so that employees have the reference material, awareness, and the opportunity to ask questions.

Provide annual training on relevant ESG topics, including training on diversity, inclusion, harassment, anti-bribery/corruption, data protection and privacy (GDPR) and other topics as appropriate.

## Social, Charitable, and Community Involvement

As part of our values, the Company aspires to achieve significant social and business impact. Just as we are passionate about our mandate for providing our clients with an unparalleled collaborative platform, we also think about our social, charitable, and

community involvement not by the money or time invested, but the overall value generated. Company performance correlates directly with value generated for people, whether that be investors, clients, employees, suppliers and partners.

1. Individual-level:
  - Provide each Company team member with the opportunity to participate in a philanthropy of their choice with a Company match of up to \$250 per year.
  - Provide employees with up to 3 days of paid time off each year to participate in a volunteer program of their choice.
2. Company-level: Integrate community involvement into our core operations
  - Provide sponsorships or donations to causes that align with Company values.
  - Hold volunteer days in the communities in which we operate.

## Diversity, Equity, & Inclusion

As part of our values, the Company is committed to its Diversity and Inclusion Policy. The Company aspires to build a strong and vibrant working environment within the Company and the Subsidiaries and will do so by seeking out diversity in every form. The strength of our work will be found in the diverse mosaic of thinking and perspectives that our employees bring to the table. We seek broad and impactful relationships inside and outside the Company to build a strong and vibrant community that contributes to our success. We identify and recruit the best talent in the market, regardless of gender, race, ethnicity, nationality, religion, orientation, or other background. We celebrate the diversity of thought among our employees, and we work continuously to foster an inclusive environment where every individual feels valued and ensures pay equity and equitable access to opportunities, so the best talent can contribute, learn, grow, and succeed regardless of background.

1. Focus on workforce diversity at the Company and the Subsidiaries.
2. The Company ensures that all employees are offered the opportunity for development based on their interests and talents within the business.

## Employee Wellbeing

The Company is committed to the well-being and continual development of our employees (meaning any individual directly or indirectly employed by the Company, including permanently employed or contracted staff, and any representatives or agents appointed to act on our behalf), to continue cultivating and sustaining a workplace where employees are appreciated and valued, where each employee has a clear understanding of their role and how they contribute to the business.

The Company recognizes its responsibility to promote the health, safety, and wellness of our employees. In connection with this commitment, the Company maintains health and safety related policies in its Employee Handbooks and through its Health, Safety and

Welfare Policy and provides a range of benefits to cover employee time off, health care, financial security, and other benefit needs.

### Goals

1. Provide employees with benefits and programs that promote both physical and mental wellbeing.
2. Provide employees with adequate leave to address both personal and familial medical needs.

## Environment & Sustainability

Our goal is to minimize our environmental impact and continue to evaluate how to conduct operations in a manner that protects the environment by making reasonable efforts to reduce energy, greenhouse gas emissions, and water usage. We are aware of our environmental impact as a business and have taken, and will continue to take, appropriate steps to mitigate this impact. We nurture a culture of waste reduction and consider renewable/sustainable consumables. We use available tools to assess carbon emissions from activities performed on behalf of the Company and the Subsidiaries, and offset such carbon emissions on an annual basis.

Although our business needs require the movement of employees via public transport (including train and air), we are committed to reducing our environmental impact by opening offices in large metropolitan areas that promote commuting by public transport, bicycle or by foot and by allowing our employees (where possible) to work hybrid in-office/remote or remote positions, to commit to recycling (and the reduction of both single use plastics and printed materials) within our offices, by working with suppliers and contractors who share the same environmental values as ourselves, and by ensuring compliance with all appropriate legislation.

1. Focus on the reduction of carbon emissions both through the use of renewable resources and through carbon offset programs.
2. Empower a workforce that is able to reduce the carbon emissions related to commuting.
3. Encourage employees to reduce/reuse waste by abiding by our Recycling Policy and avoiding the use of single use plastics.
4. Aim for net zero emissions by 2050.

## Governance Matters

### Ethics & Responsibility:

The Company believes that the successful business operation and reputation of the Company is built upon the principles of fair dealing and ethical conduct of our employees. In connection with this commitment, Company has adopted an Anti-Corruption and Bribery Policy in addition to other policies and procedures applicable to our global workforce.

### Interactions with Clients:

We aim to build long term and meaningful relationships with our clients, ensuring we fully understand objectives, meet requirements, and exceed expectations. We aim to have the highest professional and ethical standards, and pledge to be honest, open, and transparent in all our interactions with our clients.

### Interactions with Suppliers:

To ensure that each of our suppliers shares our values and principles, the Company has developed a Supplier Code of Conduct ("**Supplier Code**"), which reflects some of the values and principles most important to the Company. The Supplier Code applies to all Company suppliers, including service providers, and contractors (each, a "**Supplier**"). We require each Supplier to comply with all requirements set forth in the Supplier Code, as well as all applicable laws and regulations. The Supplier Code is provided to all Suppliers upon engagement with the Company.

### Compliance with Laws, Rules, and Regulations:

We are committed to conducting our business with honesty and integrity, and in full compliance with all applicable laws, rules, and regulations. In accordance with Company policies, no officer, director, or employee of Company may commit an illegal or unethical act, or instruct others to do so, for any reason. This includes, but is not limited to, bribery and corruption of U.S. and foreign Officials.

### Human Rights and Labor Practices:

The Company prohibits the use of any forced or compulsory labor, including human trafficking and slavery, in its operations. We comply with state and federal child labor laws through our hiring and human resources practices. To the extent any employee sees anything of concern, the employee is advised to raise a complaint to their supervisor and/or through our anonymous grievance procedure. We take all reports seriously to ensure a safe and ethical environment for all.

### Privacy and Cybersecurity:

We aim to build a comprehensive global data privacy program based upon our commitment to protect the personal data of employees, clients, suppliers, and other stakeholders. In connection with this commitment, Company has adopted data privacy policies concerning the collection of information related to current employees, candidates applying to work at Company, visitors of our Company websites, and service providers who provide products or services that may involve the use or collection of, or access to, personally identifiable information.