



Glass Lewis Sustainability Policy

Glass Lewis' mission is to partner with our customers in driving value creation through solutions that promote good governance and stewardship. We enable institutional investors and publicly listed companies to make sustainable decisions based in research and data. Our firm covers over 30,000 meetings each year, across approximately 100 global markets.

We use "sustainability" to refer to the environmental, social, and governance dimensions of a company's operations and performance. This includes both the management of environmental and social impacts as well as the management of environmental and social capitals required to create long-term value.¹

As set forth in this policy, our path to sustainability is two-fold: we promote sustainability both in the marketplace through our customer solutions and in our own operations. Specifically, our firm provides customers with a range of environmental, social and governance (ESG) solutions and market-leading thought leadership, including research, proxy vote execution, engagement, and share recall services for institutional investors as well as research and advisory services for public companies. Glass Lewis also incorporates ESG best practices directly throughout our own workforce, governance, data security, privacy, professional integrity, and environmental activities. This Sustainability Policy outlines the material areas, objectives, and practices that make up our two-fold path to sustainability.

Policy Oversight and Review. Our proxy voting policies and guidelines that inform our customer solutions are reviewed annually by our SVP of Research and our Research Advisory Council (RAC). Our internal operational policies and plans are reviewed annually by our executive leadership team. We are always looking for ways to consistently improve our commitments to material sustainability priorities.

Sustainability through Our Customer Solutions

Customers Our work with customers presents the principal opportunity for us to make a difference with regards to sustainability. Since our founding in 2003, integrating sustainability into our products and services enables our customers to maximize shareholder value while making a positive contribution to society. By promoting transparency around material ESG issues, we help investors and public companies not only drive economic growth but also protect the world in which we all live:

- We serve over 1,000 institutional customers, including the majority of the world's largest pension plans, mutual funds, and asset managers, who collectively manage more than \$40 trillion in assets.
- We serve over 1,700 corporate customers, including the public companies that make up the major global indices.
- Our Research teams are experts in local market laws, regulations, and best practices across the world, providing in-depth ESG research in more than 100 markets.
- Our Research Advisor Council (RAC), which helps inform our proxy voting policies and guidelines, is made up of independent experts in corporate governance, accounting, financial transparency, and legal and regulatory issues.

¹ Based on the definition of "sustainability" by the Sustainability Accounting Standards Board (SASB).



- We incorporate ESG data and best practices into our proxy voting guidelines, Proxy Paper research reports, Viewpoint voting platform, ESG scores, and advisory solutions.
- Our Engagement Solution enables institutional investors to promote best practices and transparency on material ESG issues among over 1,000 public companies globally.

Our customer work is also supported by our participation in stakeholder groups and keeping up to date with the latest industry sustainability information. To that end:

- We are a signatory to the Principles for Responsible Investment (PRI) and the UK Stewardship Code.
- We are members of the Best Practices Principles Group (BPPG), International Corporate Governance Network (ICGN), Council of Institutional Investors (CII), Interfaith Center on Corporate Responsibility, and Sustainability Accounting Standards Board (SASB).

Sustainability Through Our Operations

We rely on the Sustainability Accounting Standards Board's (SASB) framework for professional and commercial services to identify material sustainability topics within our business. SASB encourages our industry to focus on workforce diversity and engagement, data security, and professional integrity. Along with SASB's standards, Glass Lewis is committed to reducing its environmental footprint. We also use SASB directives to supplement our legacy commitments to responsible governance.

Workforce Diversity and Engagement We promote diversity and inclusion not only as part of our employee hiring practices but also within the workplace. Glass Lewis management has spearheaded several long-term initiatives to increase diversity, including maintaining a formal Affirmative Action program, tracking diversity trends throughout the company globally, and broadening recruitment for our largest hiring pool, Research Associates (RA). Our recent data shows:

- 100% of Glass Lewis employees receive diversity, equity, and inclusion training annually.
- In 2021, we increased the number of applicants by 35% and hired 18% more minorities and women into our RA program.
- Within the Executive Leadership Team, 44% of employees identify as women and 44% identify as members of underrepresented communities.
- Within the wider Management Team, 45% of employees identify as women.

Additional information on diversity, equity, and inclusion can be found in the GL Diversity Overview.

Glass Lewis also monitors turnover and employee engagement metrics on a regular basis to improve job satisfaction, retention, and performance. We conduct annual employee surveys in order to receive in-depth feedback; we use the results and subsequent discussions to make meaningful changes in areas where we can improve the employee experience at a company and department-level. We offer ongoing professional development opportunities, including management training, in order to promote engagement and improve productivity.

Responsible Governance. We maintain sound corporate governance and continuously practice ethics in all areas of our business. Corporate governance is upheld at all levels of the firm by our policies and procedures, which include:



- Conflict of Interest Policies and Procedures
- Supplemental Conflicts Policy (Equity Plan Advisory Service)
- Code of Ethics
- Modern Slavery Act Statement
- Foreign Corrupt Practices Act Policy
- Anti-Money Laundering and Office of Foreign Asset Control (OFAC) Policy

The complete policies and statements can be found on our website in our [Due Diligence Resources](#).

Responsible governance also encompasses our data security and professional integrity practices:

- *Data Security.* Data security and privacy is a significant priority for Glass Lewis. Our Compliance and IT teams are responsible for managing data security risks and align to the National Institute of Standards (NIST) 800 standards to ensure robust security for all data. We also undergo an annual third-party SOC 2 audit, which provides assurance regarding our customer data security, availability, processing integrity, confidentiality, and privacy.²
- *Professional Integrity.* Professional integrity is critical to all echelons of our firm, and we pride ourselves in maintaining integrity in employee, customer, and other stakeholder engagements. To that end, professional integrity is made part of our daily work by our Code of Ethics, to which each employee attests and completes training on annually.

All employees receive extensive training annually on Glass Lewis' Code of Conduct, conflict avoidance, Foreign Corrupt Practices Act, information protection, data security and privacy, social media use, social engineering, harassment and discrimination prevention, managing bias, and diversity & inclusion.

In addition, we comply with all laws and applicable regulations where we operate and hold all our business partners and vendors to the same standards we apply to ourselves. Our Vendor Code of Conduct provides clear standards related to anti-bribery and corruption, intellectual property protection, confidentiality and data privacy, conflicts of interest, international trade, labor and human rights, environmental practices, and regulatory and legal compliance.

Environmental Practices. To help reduce our limited carbon footprint and encourage stakeholders to do the same, we lead by example. We conserve our use of natural resources and energy to the extent practicable by leveraging technology to minimize travel, promoting employee use of public transportation, supporting recycling programs in our facilities, and occupying energy efficient buildings. We work with our business partners and vendors, to the extent possible, who also strive to reduce adverse environmental impacts and risks associated with their operations and optimize environmental benefits. Some current environmental practices include:

- 100% of our offices have recycling programs
- 14% of occupied buildings are LEED certified
- We are in the process of completing a greenhouse gas (GHG) emissions inventory

² SOC 2 is a voluntary compliance standard for service organizations developed by the American Institute of CPAs (AICPA).