



2024

Sustainability Report





Dear Clients and Colleagues,

Dear Colleagues and Clients,

With stewardship responsibilities accelerating in many parts of the world, 2024 has been another year of significant developments, reshaping how investors and companies understand and report on long-term risks and opportunities. At Glass Lewis, we remain committed to helping all market participants respond effectively to these changes. As we reflect on the past year, one theme has become particularly clear: high-quality stewardship is foundational to the success of long-term investing. In line with this conviction, we have expanded our global stewardship capabilities and announced the acquisition of Esgaia, a leading stewardship technology provider. This strategic expansion strengthens our ability to deliver comprehensive solutions to meet institutional investors' growing and customized needs for voting, engagement and reporting.

Now in our third decade of service, Glass Lewis continues to build on our mission to be a trusted, impartial partner to clients with diverse perspectives on today's governance landscape. Our approach combines rigorous research, thoughtful policy development, and technology to support decision-making that aligns with long-term value creation. As investor expectations grow to encompass board accountability, climate risk, human capital management, social equity, and more, we remain focused on evolving our solutions in lockstep with our clients' needs.

This year's Glass Lewis Sustainability Report outlines the progress we've made internally and in partnership with stakeholders worldwide. We continue to quantify our environmental impact, foster an inclusive workplace culture, and uphold best practices in governance and data security. Led by our cross-functional Sustainability Steering Committee, we've advanced several key initiatives in 2024, including expanding regional sustainability teams, enhancing our emissions measurement process, and piloting new programs to deepen employee engagement.

We recognize that sustainability is an ongoing journey—one that requires accountability, adaptability, and collaboration. We thank you for your continued trust and engagement, and we look forward to working together to meet the challenges and opportunities ahead.

Carrie Busch,
President



About the 2024 Sustainability Report

Glass Lewis is committed to maintaining the highest standards for our business practices and to providing our clients with exceptional research, analysis, and tools to support the execution of their diverse stewardship and corporate governance strategies. Accordingly, our approach to sustainability in our client solutions and in our operations is shaped by our commitment to objectivity, as well as our understanding of the shifting landscape of governance and evolving best practices. Our 2024 Sustainability Report includes both a review of our ongoing governance of sustainability within our organization, and discussion of the solutions we offer to clients with a need to make informed decisions on a range of ESG matters. This report also addresses forward-looking information about our current and long-term goals. We remain committed to assessing opportunities to further strengthen our sustainability reporting in future years.

Our approach to sustainability concerns two main areas – the unbiased incorporation of ESG considerations into our client solutions, and the sustainability practices and frameworks we apply in our own operations. The remaining sections of this report address our sustainability philosophy and goals in each of these areas.



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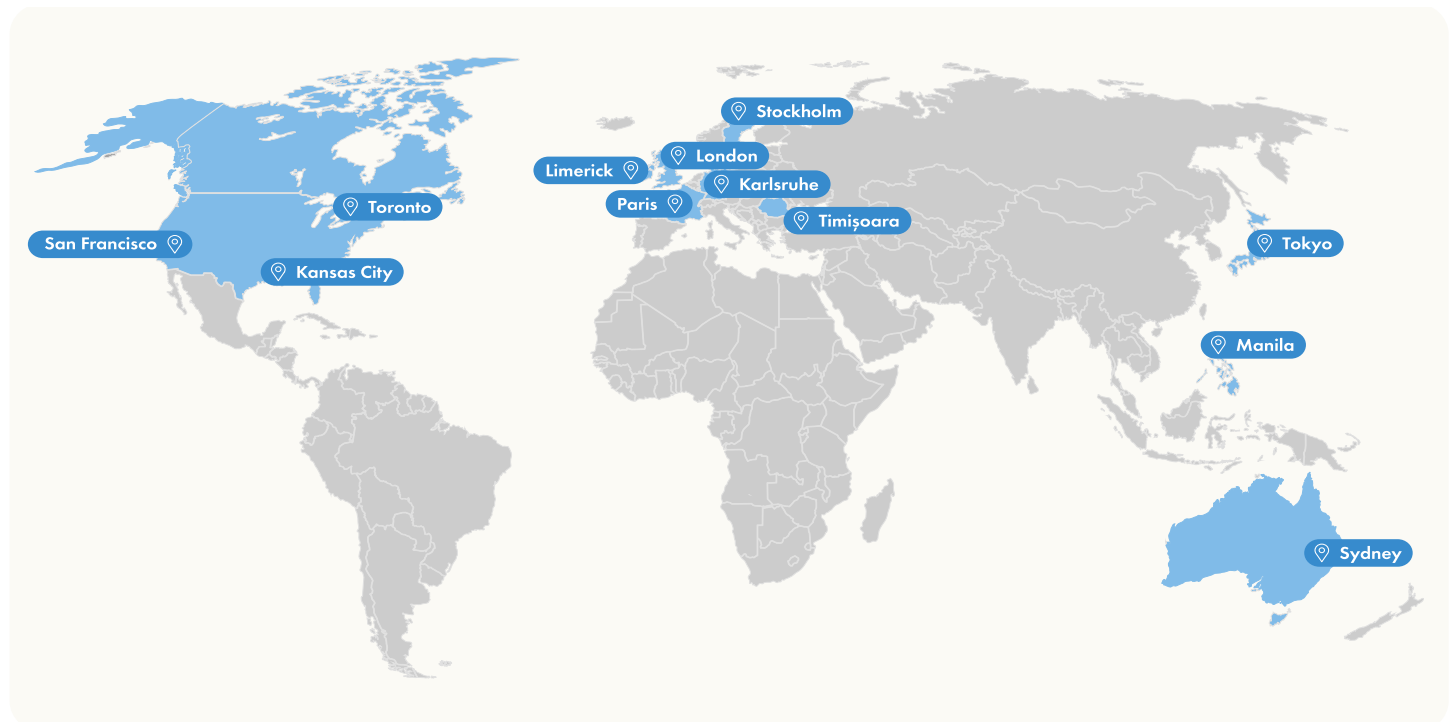


Introduction

Who We Are

Glass Lewis is a trusted ally to more than 1,300 investors globally who use our Proxy Paper research, custom policy recommendations, and industry-leading Viewpoint proxy vote management solution to help drive value across their governance activities. We also work with over 2,300 corporate issuer clients, providing research reports, thought leadership, customized voting policies, equity plan models, and opportunities for direct engagement on material governance and disclosure practices.

Glass Lewis' industry-leading research and analysis covers more than 30,000 meetings each year across approximately 100 global markets. Our clients include many of the world's leading pension funds, mutual funds, and asset managers, collectively managing over \$40 trillion in assets. We have teams located across the United States, Europe, and Asia-Pacific regions, giving us global reach with a local perspective on the most important governance issues. Founded in 2003, Glass Lewis is headquartered in San Francisco, California with additional offices in Kansas City, Missouri; London, U.K.; Paris, France; Limerick, Ireland; Karlsruhe, Germany; Stockholm, Sweden; Manila, Philippines; Toronto, Canada; Sydney, Australia; Timișoara, Romania; and Tokyo, Japan. Our team includes more than 400 full-time employees globally, over half of which are dedicated to research.



Our Sustainability Philosophy

Since our founding, Glass Lewis has viewed efficiency and transparency as core to effective stewardship and corporate governance. As the challenges of creating value have evolved, so have expectations of service providers and proxy advisors. We have adapted to meet the changing needs of clients and stakeholders.

Institutional investor markets in the U.S. and Europe increasingly diverge in their interpretations of fiduciary duty, issuer engagement approaches, views on environmental and social issues, and use of proxy voting. In this shifting landscape, we are enhancing our capabilities to offer policy options that reflect diverse regional standards and perspectives. Regardless of individual client views, we remain committed to providing independent data, analysis, and vote execution, all supported by strong client service. We deliver solutions that help stakeholders meet fiduciary duties and governance objectives.

Our focus on sustainability stems from the growing need for investors and issuers to understand and address material ESG issues within their operations and supply chains. Our efforts in this area fall into two categories: delivering ESG-focused solutions for clients needing data and analysis, and improving our own sustainable practices internally.

Our suite of solutions supports clients focused on corporate governance fundamentals and those interested in sustainability. In our sustainability offerings, we take a broad view of material ESG factors that support long-term value creation. Our proxy voting policies and guidelines are informed by continuous research, best practices, and principles from organizations we join or endorse. We review these policies annually and incorporate ongoing market feedback gathered through public comments and client surveys.

Internally, we integrate ESG best practices across workforce management, governance, data security, privacy, integrity, and environmental practices. Our executive leadership team reviews and approves operational policies each year, with ESG initiatives overseen by our Sustainability Steering Committee. We will continue to explore opportunities to strengthen our response to material sustainability issues and expand our solutions to meet the evolving needs of clients globally.

Our Sustainability Strategy

In line with our responsibilities to our clients, partners, employees, and other stakeholders, Glass Lewis is committed to maintaining and building sustainable practices within our internal operations. Our governance of operational sustainability matters is overseen by our Sustainability Steering Committee, responsible for establishing sustainability goals for the company, laying out a strategic roadmap to achieve these goals, and monitoring progress over time. The Steering Committee retains an outside consultant to advise on the development of our targets and roadmap, and our efforts are further guided by regional Sustainability Committees focused on identifying opportunities to improve practices in each operating region.



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To ensure alignment with established best practices in our industry, the Steering Committee has aligned our primary sustainability focus areas and goals with the Sustainability Accounting Standards Board's (SASB) framework for professional and commercial services firms. SASB provides a widely-accepted, repeatable, thorough, and industry-specific framework, which enhances the comprehensibility of our efforts for interested stakeholders. SASB encourages firms in our industry to focus on workforce diversity and engagement, data security, and professional integrity. Glass Lewis is also committed to reducing its environmental footprint, which alongside SASB's standards, comprises the four sustainability pillars around which our sustainability roadmap is organized.

The sustainability roadmap set forth by our Steering Committee includes specific 2024 initiatives as well as three-year goals established in four key focus areas: workforce diversity and engagement, data security, professional integrity, and climate and environmental impacts. These goals and the short-term initiatives that support our advancement are discussed in more detail in the Operational Sustainability sections of this report.

Governance & Business Ethics

Glass Lewis understands the importance of due diligence for clients engaging our services as a proxy advisor, and we are committed to maintaining the highest standards of professional governance and business ethics. We maintain strict policies and procedures to prevent, identify, and manage perceived or actual potential conflicts of interest across our organization, and all employees complete mandatory training covering our policies and procedures on an annual basis.

Corporate governance is upheld at all levels of the firm by our policies and procedures, which include:

- Conflict of Interest Policies and Procedures
- 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](#).



Memberships and Affiliations

As part of its stakeholder collaboration, Glass Lewis is proud to maintain affiliations with a number of NGOs involved in advancing the fields of corporate governance and stewardship, including:

- Council of Institutional Investors (CII);
- International Corporate Governance Network (ICGN);
- Principles of Responsible Investment (PRI);
- Responsible Investment Association Australasia;
- SASB Alliance; and
- Society for Corporate Governance.

Solutions, Market Research & Engagement

Supporting Client Initiatives

As a trusted partner to investment, operations, and compliance teams globally, Glass Lewis recognizes that we have a responsibility to support our clients' efforts to drive value in accordance with their unique needs and perspectives. While many of our clients are primarily focused on their core fiduciary duties as investors, many also have strategies focused on ESG risk management or operate in markets with significant ESG regulatory requirements. Through our solutions, research, and proxy voting policies, Glass Lewis helps our clients maximize shareholder value while executing their strategic initiatives and meeting a variety of external requirements.

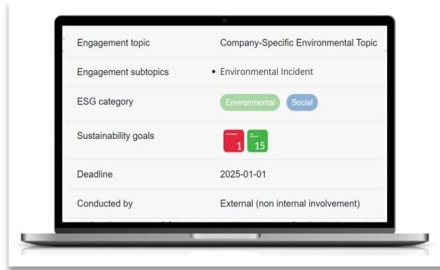
It is our goal to empower our clients to make informed decisions and to execute on their responsibilities as investors by delivering the highest quality research and analysis. To this end, we offer a range of distinct and custom voting policies to help institutional investor clients achieve their specific proxy voting goals, including certain policies focused on aspects of long-term sustainability. We work continuously to enhance our sustainability-focused solutions for those clients who rely on them, including periodically reviewing industry best practices and established third-party frameworks.

Glass Lewis maintains an unbiased perspective in all our research and strives to incorporate material ESG information and analysis into our offerings for sustainability-focused clients in a balanced manner complementing our role as a trusted provider of holistic governance services. Our solutions for investors and public companies are summarized in the following sections of this report.

Investor Solutions

We serve a diverse array of institutional investor clients located around the world, with unique perspectives, goals, and values. Accordingly, our services address a wide variety of needs, including proxy voting and reporting support, in-depth topical analysis to inform decision-making, and flexible options for extending engagement efforts with issuer companies.

Stewardship Solutions



Glass Lewis offers a comprehensive suite of Stewardship Solutions for institutional investors, designed to support clients with a range of engagement needs, including custom program design, active engagement, and tracking and reporting of activities and progress. These solutions empower our investor clients to manage and monitor engagement goals and outcomes, participate in thematic engagements led by Glass Lewis' Stewardship team, or implement fully customized campaigns executed by our in-house experts.

Within our Active Stewardship Engagement service, Glass Lewis identifies and engages with companies using our proprietary corporate governance research, helping investors drive meaningful outcomes while optimizing resources. Topics and engagement goals are aligned with widely adopted frameworks, supporting the diverse stewardship objectives of our clients.

For investors with specific governance priorities, our Custom Engagement service delivers tailored campaigns. Our Stewardship team manages the full engagement process: screening portfolios by topic, identifying and contacting target issuers, sending engagement communications, tracking responses, and facilitating or leading meetings.

In 2025, we expanded our Stewardship Solutions through our acquisition of Esgaia, a leading provider of stewardship technology. This integration unites our research-driven engagement services with Esgaia's purpose-built platform for stewardship workflows. Clients using Active Stewardship or Custom Engagement services can now track and analyze engagement activities more efficiently, streamline internal processes, and improve transparency for stakeholders. Our stewardship solutions align with our mission of empowering investors to act as more effective stewards, helping them manage ESG and governance risks, fulfill regulatory and fiduciary obligations, and respond to growing demands for responsible investment practices.

Viewpoint

Glass Lewis' industry-leading proxy voting management platform enables institutional investors to maximize the efficiency and reportability of their voting activity, combining access to our industry-leading research and governance expertise with flexible software for team collaboration, vote casting and reporting. With streamlined tools for prioritizing and assigning key meetings and proposals, sharing team communications and voting access, and extracting data for reporting or historical analysis, Viewpoint allows investors to focus their time and energy on reaching their stewardship goals. To facilitate a centrally organized and streamlined voting process, clients can also choose to apply a custom voting policy through Viewpoint, or apply one of our customizable thematic voting policies, including some focusing on various sustainability themes. Glass Lewis' voting policies are discussed in further detail below.



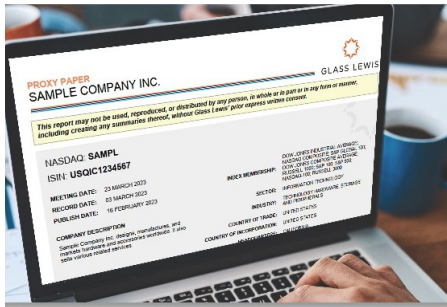
Proxy Voting Policies

We offer a broad range of proxy voting policies designed to support our institutional investor clients in carrying out their voting responsibilities according to their specific stewardship goals. Our policies serve clients around the world with various perspectives, and we are continually expanding our offerings to address the evolving needs of investors. Many of our current voting policies are focused on core governance issues, including our Benchmark Policy that reflects current, predominant views of institutional investor clients on corporate governance best practices. Our Corporate Governance Focused Policy focuses on supporting fiscally responsible governance structures that establish a strong board and management team with appropriate incentives and safeguards to maximize returns.

Glass Lewis also offers voting policies specifically designed to address a variety of ESG and sustainability concerns as well as other important themes. All policies are fully customizable based on the goals of the clients that employ them, and investors can also build and implement a fully tailored voting policy in line with their particular investment goals. The majority of our clients apply custom voting policies.

Corporate Governance Research

In our research-based Proxy Papers, Glass Lewis provides analysis of all the proposals pertaining to tens of thousands of shareholder meetings each year across more than 100 markets worldwide. Our investor clients rely on the data and insights published in Proxy Papers to make educated voting decisions, and our research and analysis are intended to provide a holistic view of company governance practices, covering a wide range of topics including compensation, board details, and ESG data. Glass Lewis' team of expert researchers and analysts situated around the world provide nuanced analysis and local expertise on each topic in a single comprehensive report for every covered meeting. The Proxy Paper is designed to enable institutional investors to navigate analysis and data easily and execute their voting responsibilities efficiently, with agenda items and recommendations summarized in an overview and linked to relevant analysis in the report.



Where appropriate, considering company location and the materiality of certain ESG topics, our sustainability analysis is incorporated into Proxy Paper reports in an ESG Profile section and ESG Score. Our analysis of ESG issues is offered to enhance the holistic overview of corporate governance practices provided in our research reports, and where included, company ESG Scores have no direct bearing or determinative effect on any of Glass Lewis' recommendations.

Contested Situations and M&A Research

In addition to coverage of routine proposals put forward at annual general meetings, Glass Lewis offers solutions designed to enable investors to make informed voting decisions on special situations. We publish hundreds of special situations reports each year providing economic analysis and context on high-profile events including M&A, contested M&A, and contested director elections. Glass Lewis also offers exclusive Proxy Talk webinar opportunities to parties on both sides of special situations to present their cases to our investor clients.

Reporting and Voting Disclosure

We offer flexible reporting options designed to accommodate investor voting disclosure needs. These include facilitation of regulatory filing preparation and reporting under various voluntary governance and stewardship codes. We also enable investors to report information on their stewardship and engagement efforts to clients and the public through our web hosting services, providing stakeholders with access to hosted information via links on our investor clients' websites. Investors can customize the information presented and how data is displayed, offering visitors the ability to easily navigate between accounts and meetings, view voting decisions at a chosen interval, and review voting rationale.

N-PX Reporting Service

Glass Lewis' comprehensive N-PX reporting service supports firms already filing form N-PX as well as 13-F filers who now need to comply with the U.S. SEC's enhanced N-PX requirements. The N-PX service includes generation of files for submission in required formats based on up-to-date proxy voting records stored in our Viewpoint platform, with flexible options for capturing voting data from other sources. Our dedicated N-PX Operations team ensures a timely, thorough, and accurate submission, employing rigorous checks and controls that enable us to highlight key areas for review.

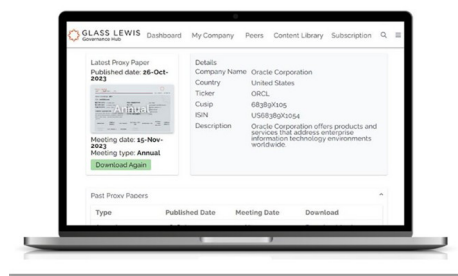
Public Company Solutions

With recognition of our role as a provider of insights to institutional investors, Glass Lewis is committed to offering resources and services to companies that foster a transparent understanding of the analysis we provide to shareholders, and enable interested companies to optimize their corporate governance programs and practices. Our resources for issuers include Proxy Paper research reports, annual policy updates, equity compensation and pay-for-performance modelers, as well as sustainability-oriented offerings related to ESG data and cybersecurity risk management. We also encourage companies to verify data our research team collects about them through our Issuer Data Report program and present their governance narrative to voting investors with a Report Feedback Statement included alongside our Proxy Papers.



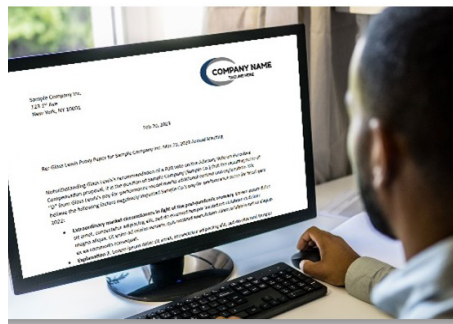
Governance Hub

Governance Hub is our central platform for public companies, designed to help issuers navigate the ever-evolving corporate governance landscape and be well-prepared for annual general meetings. Subscribers can access Proxy Papers containing our vote recommendations related to their company and peers, as well as broader research reports and thought leadership publications.



Insights into our assessments and special reports on key market trends empower our corporate clients to fortify their governance programs and better understand the expectations of their largest investors. Governance Hub clients also have an opportunity to ensure that their corporate governance narrative is understood by the institutional investors reviewing our Proxy Papers through a Report Feedback Statement published alongside our research and analysis.

Report Feedback Statement

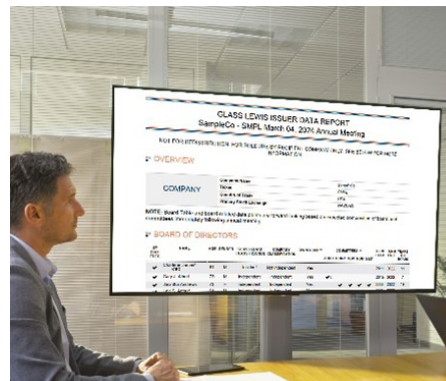


Available through the Governance Hub platform, our unique Report Feedback Statement (RFS) program enables companies to convey their corporate governance narrative to the voting decision-makers at every investor client alongside Glass Lewis' research and recommendations. The RFS offers issuers the certainty of knowing their opinions will be presented to investors in time for voting decisions to be made or changed.

Companies and shareholder proponents have used the RFS to add context to details included in public filings, express their perspective on the topics of our analysis and recommendations, respond to shareholder proposals by highlighting pertinent public information, and reinforce Glass Lewis' analysis or recommendations when aligned with the approach of the board.

Issuer Data Verification

Prior to the publication of our Proxy Paper research reports, public companies can register to receive an Issuer Data Report (IDR) including the data used in Glass Lewis' analysis and recommendations to ensure data is reflected per public disclosures. Glass Lewis is dedicated to developing high quality, accurate corporate governance research, and offers the IDR program to facilitate greater transparency with the companies we cover. IDR registration is open on the Glass Lewis website to all covered issuers in the US, Canada, Europe, Japan, Israel, Malaysia, Singapore, India, and South Africa. Companies that subscribe to Governance Hub can also register easily within the platform.



Equity Compensation Services

For U.S. and Canadian companies covered by Glass Lewis' quantitative equity compensation model assessment, we offer tools and analysis that support alignment of equity compensation programs with industry best practices and Glass Lewis' assessment framework. Our services empower issuers to develop an enriched understanding of shareholder expectations on plan design, benchmark plan costs against peer programs, and ultimately build new share proposals that are more likely to gain investor support.

Executive Compensation Tools

Glass Lewis is committed to providing tools and resources for the companies we cover in our research that help them to better understand how their executive pay programs compare to peers, and how they are assessed by institutional investors. To this end, we offer a platform for analyzing and benchmarking executive compensation programs. The platform enables companies to evaluate their equity plans and to model executive pay for performance outcomes using the same criteria Glass Lewis uses in the quantitative pay for performance assessments published in our Proxy Papers.

Cybersecurity Risk Evaluation

Glass Lewis provides a cybersecurity risk evaluation solution for public companies through our partnership with BitSight, a global cyber risk management leader.



Market Education and Stakeholder Engagement

Glass Lewis engages in a variety of efforts to promote a broader understanding of both our policies and guidelines, and of ongoing developments in governance and stewardship for all kinds of market stakeholders. We foster a regular dialogue with investors, issuers, and other organizations both through direct engagement and public feedback mechanisms throughout the year. In addition to facilitating market education, this dialogue helps us identify areas of potential refinement and improvement of our operations and solutions in alignment with best practices for proxy advisory firms.

As part of our efforts to serve as a knowledge base for investors, companies, and other stakeholders, Glass Lewis produces regular research-based thought leadership and market trend analysis. In addition to Proxy Paper research reports focused on individual companies, we publish annual proxy season preview and review reports for each region, highlighting key developments in company practices and shareholder concerns in detail. We additionally offer numerous webinars, blog articles, roundtable events, and white papers covering a wide range of major regional and issue-based topics related to governance, proxy voting, and ESG matters. Our subject matter experts also regularly attend and speak at leading industry events organized by others.

We are committed to ongoing engagement with all market participants and are proud to have long-standing relationships with issuers and their representatives, including proxy solicitors, consultants, law firms, and others. We believe that interactions with issuers, at the appropriate time, can foster mutual understanding on governance, environmental, and social issues, and enhance transparency between Glass Lewis and the listed companies in which our clients invest. In accordance with our commitment to transparency and accuracy, we offer numerous channels for direct communication with issuer companies, including meeting opportunities with our Issuer Relations team to better understand our methodologies and assessments and discuss material issues related to their unique operations.

Operational Sustainability

As a growing organization with teams located in Europe, North America, and the Asia-Pacific region, Glass Lewis is committed to maintaining and continuously refining sustainable practices in our own operations around the globe. Our efforts are directed by the Glass Lewis Sustainability Steering Committee, which sets forth sustainability goals for the company and establishes a roadmap for meeting identified targets.

Our internal sustainability initiatives are guided by the framework set forth by the Sustainability Accounting Standards Board (SASB) for Professional and Commercial Services firms. SASB's Professional and Commercial Services framework outlines disclosure standards related to workforce diversity and engagement, data security, and professional integrity. Alongside targets established in each of these areas, the Steering Committee has established further commitments related to emissions reduction and mitigation of climate change, including targets approved by the Science Based Targets initiative. We have established goals and targets in each of the four pillars identified as key focus areas by the Committee, as discussed in the following sections.



The data, targets, and roadmap presented herein are representative of practices and reporting structures that continue to evolve. Glass Lewis strives to maintain best practices in each of our core focus areas, and will continue to strengthen our tracking and reporting as we progress toward our long-term goals. In the coming years, the Steering Committee will continue to review and implement best practices throughout our operations in dialogue with our external sustainability consultant.

Operational Sustainability Roadmap

The four core pillars of our internal sustainability initiatives serve as a basis for establishing short- and long-term goals in each area, including a quarterly roadmap for progress toward our targets.



Climate & Environment



In the Climate & Environment area, we are committed to reducing our limited carbon footprint. Glass Lewis makes an effort to conserve our use of natural resources and energy by leveraging technology to minimize travel, promoting employee use of public transportation, supporting recycling programs in our facilities, and occupying energy-efficient buildings. To the extent possible, we work with business partners and vendors who also strive to reduce adverse environmental impacts and risks associated with their operations and optimize environmental benefits.

Glass Lewis has organized regional sustainability committees, which serve to identify and assess opportunities to improve our environmental practices in each region. We have also established Glass Lewis Day of Service opportunities and promoted these opportunities to our employees in each region, both steps supporting our Climate & Environment and workforce engagement-related efforts. Some highlights of our current environmental practices include recycling programs instituted at 100% of our buildings, expansion of our occupied buildings that are LEED certified, and completion of a greenhouse gas emissions inventory each year.

The company's established greenhouse gas (GHG) targets have been validated by the Science Based Targets initiative (SBTi), a global body enabling businesses to set ambitious emissions reductions targets in line with the latest climate science. Specifically, Glass Lewis has committed to a 42% reduction in Scope 1 and 2 emissions reductions by 2030 from a 2022 base year, and to work toward measuring and reducing our Scope 3 emissions. In 2024, our Scope 1 emissions totaled 6.26 MT CO₂e, while our Scope 2 emissions totaled 82.59 MT CO₂e.

As part of our continuing climate strategy, we have identified numerous steps that can be taken by the company to reduce emissions, which include transitioning buildings to renewable energy sources, moving additional operations to LEED certified buildings, and reducing waste and increasing energy efficiency within each office.



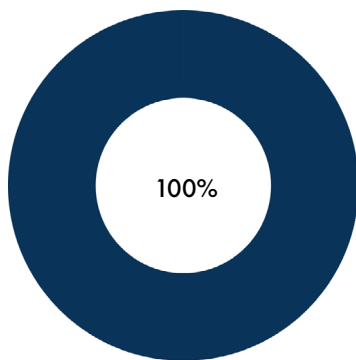
Workforce Diversity & Engagement



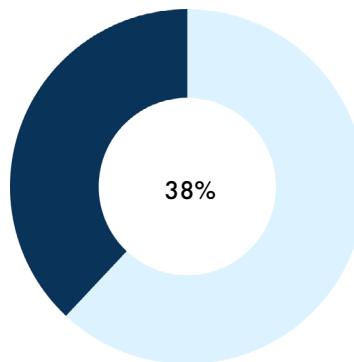
Workforce Diversity & Engagement is another critical sustainability focus area for Glass Lewis. We promote diversity and inclusion not only as part of our employee hiring practices but also within the workplace. Glass Lewis management has spearheaded several long-term initiatives to increase diversity, including maintaining a formal Affirmative Action program, tracking diversity trends throughout the company globally, and broadening recruitment for our largest hiring pool, our Research Associates (RAs). Additional information on diversity, equity, and inclusion can be found in the GL Diversity Overview.

Our recent data shows:

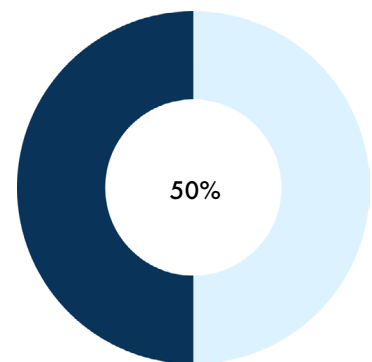
100% of our employees receive diversity, equity and inclusion training each year.



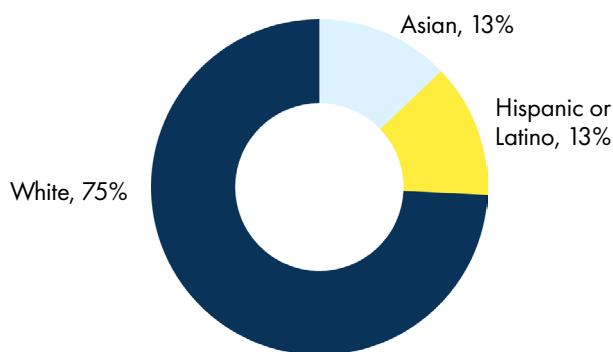
We maintain a diverse and Inclusive workforce.



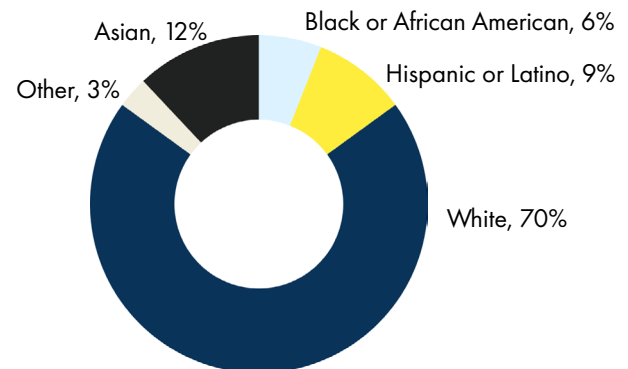
38% of our Executive Management Team identify as female.



50% of all other full-time employees identify as female.



26% of our Executive Management Team identify as Asian, Black or African American, Hispanic or Latino, Native American, Pacific Islander, or two or more races.



Among all other full-time employees in the United States, 30% identify as Asian, Black or African American, Hispanic or Latino, Native American, Pacific Islander, or two or more races.

Glass Lewis also monitors turnover and employee engagement metrics on an ongoing basis to improve job satisfaction, retention, and performance. We conduct in-depth employee surveys annually, using the results and subsequent discussions to make meaningful changes in areas where we can improve the employee experience. To promote engagement and improve productivity and inclusion, we also offer ongoing professional development opportunities, including management training.



Professional Integrity



Professional Integrity has been a long-term pillar for Glass Lewis since the company was founded. In this area, we continue to use SASB directives to supplement our legacy commitments to responsible governance. Our efforts are led by our compliance team, whose current objectives and action plans are integrated into our sustainability roadmap. Our Steering Committee includes members of our compliance team, who monitor and report on progress toward our short- and long-term goals.

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, modern slavery, environmental practices, and regulatory and legal compliance.

In the Professional Integrity area, we uphold the highest standards of conduct to be a trusted partner to our clients and employees. Professional integrity is critical at all levels of our firm, and we pride ourselves in maintaining integrity in employee, client, 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 following comprehensive annual training. We continue to maintain a Global Culture Guide and Global Conduct Manual, supplemented by regional employee handbooks to ensure consistent expectations of professional conduct across our organization.

We are a signatory to or participant in initiatives including the Best Practice Principles Group and the UK Stewardship Code by the FCA. Additionally, we participate in various projects to ensure alignment with industry best practices for proxy advisors like the Principles for Responsible Investment (PRI) proxy project. For more information, see the Memberships and Affiliations section of this report.

Data Security



Data Security and privacy has been a significant priority for Glass Lewis since our founding. 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 client data security, availability, processing integrity, confidentiality, and privacy. In our ongoing efforts to maintain a comprehensive program that incorporates global best practices and ensures protection of client and employee information, the company maintains Trust & Data Security Package .

Additional Resources

Further resources on our current sustainability policies, guidelines and solutions for institutional investors and corporations are included below.

For Investors:

- Thematic Voting Policies <https://www.glasslewis.com/investor-solutions/thematic-voting-policies>
- Climate Focused Policy <https://www.glasslewis.com/investor-solutions/proxy-voting-policies>
- Voting Policies by Country <https://www.glasslewis.com/policy-guidelines>
- Stewardship Services and Solutions <https://www.glasslewis.com/investor-solutions/investment-stewardship>
- ESG Profile <https://www.glasslewis.com/investor-solutions/esg-profile-data>
- ESG Controversy Alerts <https://www.glasslewis.com/investor-solutions/controversy-alerts>
- Share Recall <https://www.glasslewis.com/investor-solutions/share-recall>
- Right Claim <https://www.glasslewis.com/investor-solutions/class-action-recovery-services>

For Public Companies:

- Governance Research <https://www.glasslewis.com/corporate-solutions/corporate-governance-research>
- ESG Profile <https://www.glasslewis.com/corporate-solutions/esg-profile>
- Meet with Glass Lewis <https://www.glasslewis.com/issuer-relations/meeting-requests>
- Proxy Talks <https://www.glasslewis.com/corporate-solutions/proxy-talks>

About Glass Lewis:

- About Us & Executive Leadership <https://www.glasslewis.com/about-us>
- Due Diligence <https://www.glasslewis.com/compliance/due-diligence-resources>
- Best Practice Principles <https://www.glasslewis.com/compliance/best-practices-principles>



Connect with Glass Lewis

Corporate Website | www.glasslewis.com

Email | info@glasslewis.com

Social | [X @glasslewis.com](https://www.instagram.com/glasslewis)

[in Glass, Lewis & Co.](https://www.linkedin.com/company/glass-lewis-co)

Global Locations

North America

UNITED STATES

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