



# Seprotec ESG Report 2025

*Generated by*



*on 2026-02-11*



# Executive summary

---



-

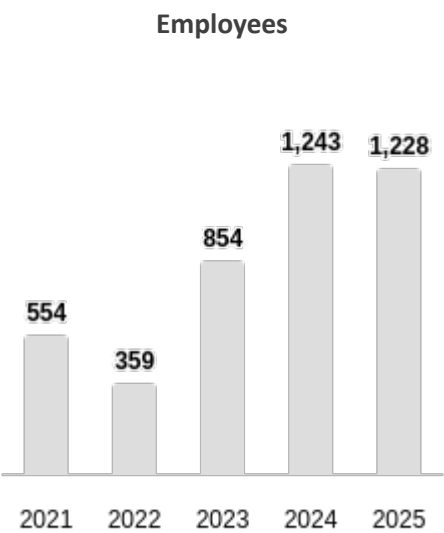
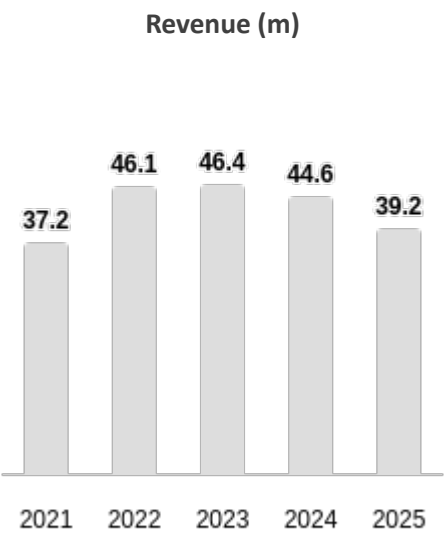
# Company overview

Please find below an overview of Seprotec

## About Seprotec

Seprotec is a multilingual service provider with 30 years of experience in providing solutions in the world of translation and interpreting. It has a presence in 9 countries with 12 offices and more than 1,000 clients.

Country of HQ	Spain
City of HQ	Madrid
Country of operations	Spain
Primary industry	IT Consulting & Other Services
Secondary industry	IT Consulting & Other Services
Website	<a href="https://seprotec.com/">https://seprotec.com/</a>










## ESG Theme Performance

Please see below an overview of the selected material ESG themes. For each of the selected material themes, a self-assessment has been conducted on a 5-point performance scale, ranging from 'reactive' to 'future proof' performance. For an overview of the tailored ESG performance descriptions for each selected theme, please see the Theme Performance Overview Section in the Annex. While proprietary to ESG Advantage, the performance levels are aligned with science-based and international standards wherever possible.

The ESG Performance Rating indicates how well Seprotec manages its key material ESG themes. The performance rating is calculated as the average performance rating on each of the key material ESG themes. Overall, Seprotec performs on an Committed level, indicating actions plans/strategies in place to integrate ESG, focused both on ESG risks and opportunities (including KPIs and targets).

### Performance of ESG material themes

	<b>Compliance and risk management</b>	<b>Theme Performance Rating</b>	<b>3</b>
	<b>Rationale:</b> Hemos valorado los riesgos y estamos implantado las medidas para mitigar esos riesgos.		
	<b>Carbon footprint management</b>	<b>Theme Performance Rating</b>	<b>2</b>
	<b>Rationale:</b> MJ Hudson's evaluation based on our maturity scale methodology		
	<b>Diversity, Equity and Inclusion</b>	<b>Theme Performance Rating</b>	<b>4</b>
	<b>Rationale:</b> MJ Hudson's evaluation based on our maturity scale methodology		
	<b>Data protection &amp; customer privacy</b>	<b>Theme Performance Rating</b>	<b>4</b>
	<b>Rationale:</b> MJ Hudson's evaluation based on our maturity scale methodology		
	<b>Employee engagement &amp; well-being</b>	<b>Theme Performance Rating</b>	<b>2</b>
	<b>Rationale:</b> MJ Hudson's evaluation based on our maturity scale methodology		
	<b>Data protection and cybersecurity</b>	<b>Theme Performance Rating</b>	<b>4</b>
	<b>Rationale:</b> MJ Hudson's evaluation based on our maturity scale methodology		
	<b>Integration of ESG strategy</b>	<b>Theme Performance Rating</b>	<b>3</b>
	<b>Rationale:</b> MJ Hudson's evaluation based on our maturity scale methodology		
<b>ESG Performance Rating</b>			<b>3.1</b>

# Action Plans

This section contains self-defined action plans and initiatives aimed at improving the ESG performance over the coming years. The action plans contain a description of the planned initiative, a progress description, to which ESG theme the initiative is linked, a target date, a responsible person, and a status. Please see below an overview of the ESG initiatives.

Environmental			
<b>Initiative:</b> Raising awareness of climate change among clients and employees (training and communication).			
<b>Progress description:</b> Progress has been made with employees through a mobility questionnaire. A virtual notice board has been created where preventive measures for employees have been posted. The IT department has sent emails to employees promoting energy savings. Informational updates have been shared on digital carbon footprint and environmental news.			
ESG Theme	Target date	Responsible	Status
Carbon footprint management	2024/09/30	Carlos Vidal	Completed
<b>Initiative:</b> Progressing on the emissions reduction plan.			
<b>Progress description:</b> All offices in Spain have installed LED lighting. All electricity contracts have been switched to green energy contracts. We have paper and electricity reduction targets, which we meet annually. We are measuring the carbon footprint including Scope 3 emissions.			
ESG Theme	Target date	Responsible	Status
Carbon footprint management	2024/12/31	Carlos Vidal	Completed
<b>Initiative:</b> Establishing Scope 3 data collection processes.			
<b>Progress description:</b> Mobility surveys have been sent to employees and Scope 3 emissions are being measured across the value chain, including suppliers and clients.			
ESG Theme	Target date	Responsible	Status
Carbon footprint management	2024/12/31	Carlos Vidal	Completed

Social

**Initiative:** Development and communication of corporate purpose and culture.

**Progress description:** The document has been prepared and distributed to all employees through the employee portal (Bizneo).

ESG Theme	Target date	Responsible	Status
Employee engagement & well-being	2024/09/30	-	Completed

**Initiative:** Employee engagement survey.

**Progress description:** Launched in November 2024 and again in December 2025.

ESG Theme	Target date	Responsible	Status
Employee engagement & well-being	2024/12/31	Pilar Vega	Completed

**Initiative:** People strategy based on leadership (development programmes), diversity and recognition.

**Progress description:** Progress has been made in staff training through a structured training plan, and employee benefits systems (nursery allowance, meal vouchers, health insurance, etc.) have been implemented through the COBEE provider card. Progress has also been made in job descriptions, job grading, salary levels and career path development.

ESG Theme	Target date	Responsible	Status
Employee engagement & well-being	2024/12/31	Pilar Vega	Completed

## Governance

**Initiative:** Regulatory compliance programme.

**Progress description:** Working with an external consultancy: risk analysis completed, along with the definition of objectives and risk levels. Risk mitigation measures are being implemented.

ESG Theme	Target date	Responsible	Status
Compliance and risk management	2024/06/30	Carlos Vidal	Completed

**Initiative:** Compliance training for key employees.

**Progress description:** We aim to complete the Compliance audit in the first half of 2026. Once the report is finalised, it will be communicated to all staff.

ESG Theme	Target date	Responsible	Status
Compliance and risk management	2024/09/30	Carlos Vidal	In Progress

**Initiative:** Progress towards ISO 27001 certification.

**Progress description:** In December 2024, we achieved ISO 27001:2022 certification. In November 2025, we renewed the certification following the first surveillance audit conducted by SGS.

ESG Theme	Target date	Responsible	Status
Data protection and cybersecurity	2024/12/31	Javier Alemán	Completed

**Initiative:** Cybersecurity training for employees.

**Progress description:** This is a requirement of ISO 27001. Cybersecurity training sessions have been delivered to Seprotec staff in different groups and on various dates. These courses will continue throughout 2026 to ensure completion by all employees, including new hires.

ESG Theme	Target date	Responsible	Status
Data protection and cybersecurity	2024/09/30	Javier Alemán	Completed

**Initiative:** Cybersecurity Policy.

**Progress description:** Completed.

ESG Theme	Target date	Responsible	Status
Data protection and cybersecurity	2024/09/30	Javier Alemán	Completed

**Initiative:** Development of a Sustainability Policy.

**Progress description:** The Sustainability Policy has been drafted and published.

ESG Theme	Target date	Responsible	Status
Integration of ESG strategy	2024/06/30	Carlos Vidal	Completed

**Initiative:** Definition of ESG metrics linked to the SDGs.

**Progress description:** Metrics have been defined and aligned with the SDGs.

ESG Theme	Target date	Responsible	Status
Integration of ESG strategy	2024/06/30	Carlos Vidal	Completed

**Initiative:** Development of a Code of Ethics.









**Progress description:** The Code of Ethics has been drafted and communicated to all staff.

ESG Theme	Target date	Responsible	Status
Integration of ESG strategy	2024/09/30	Carlos Vidal	Completed














# ESG Indicators















This section provides an overview of a number of key ESG indicators, including the Carbon Footprint. Progress on the ESG indicators is displayed over the last three years.

Carbon Indicators	Progress over time	2023	2024	2025
Scope 1 emissions (tCO2e)		1.9	1.9	2.2
Scope 2 emissions (tCO2e)		14	11	10
Scope 3 emissions (tCO2e)		177	228	277
Scope 1+2 emissions (tCO2e)		16	13	12
Total emissions (tCO2e)		193	241	290
Scope 1+2 revenue intensity (tCO2e/€m Rev)		0.34	0.29	0.31
Revenue intensity (tCO2e/€m Rev)		4.2	5.4	7.4
Employee intensity (tCO2e/FTE)		0.23	0.19	0.24




Report notes:

Environmental Indicators	Progress over time	2023	2024	2025
Renewable energy use (%)		0	0	0
Total energy consumption (MWh)		56	48	44
Energy Intensity (MWh/€m rev)		1	1	1
Total electricity consumption (MWh)		47	39	34
Renewable energy produced (MWh)		0	0	0
Non-renewable energy produced (MWh)		0	0	0
Total energy production (MWh)		0	0	0
Emissions to water (Tonnes)		0	0	0
Hazardous or radioactive waste (Tonnes)		0	0	0
Emissions to water value intensity (tonne/€m inv)		0	0	-
Hazardous or radioactive waste value intensity (tonne/€m inv)		0	0	-
















**Report notes:**

Social Indicators	Progress over time	2023	2024	2025
Total number of board members (#)		6	5	3
Number of women on the board (#)		3	1	1
Gender diversity of the board (%)		50	20	33.3
Gender diversity at c-level (%)		54.5	38.5	57.1
Total number of women in the workforce (FTE)		-	-	793
Male earnings (€ per hour)		12	17	-
Female earnings (€ per hour)		12	15	-
Unadjusted gender pay gap (%)		4.1	10.7	-
Employee engagement survey response rate (%)		-	24.7	46.9
Employee turnover (%)		10.8	26.3	37
Work-related injuries (#)		9	16	17
Days lost due to injury (#)		216	452	984
Work-related fatalities (#)		0	0	0
Accident rate (#)		5.3	6.4	6.9

**Report notes:**

General Indicators	Progress over time	2023	2024	2025
Revenue (€m)		46.4	44.6	39.2
Total employees		854	1243	1228
Total net new hires		495	389	-16

**Report notes:** Total net new hires calculated as FTE. Many employees are part time

Custom Indicators	Progress over time	2023	2024	2025
Accident rate – Frequency (Number)		11.23	15.56	22.63
Severity rate (Number)		0.27	0.46	1.31
Absenteesm (%)		4.23	5.83	4.06
Independent members of board (%)		17	17	17
Daily discharge flow rate (m3)	No data available	-	-	-
Total number of days the company is active (Number)		365	366	365
Total net new hires (Number)		495	389	-
Average workforce (Number)		462.23	546.06	425.64
Workforce at the end of the year(Number)		854	1243	1227
Employee departures (Number)		370	424	460
Employee entries (Number)		237	847	407
Total energy consumed (Number)		56000	48000	34275
% renewable (%)		0	0	0
% grid electricity (%)		100	100	100
# of data breaches (Number)		0	0	1
Monetary losses as a result of legal proceedings associated with anti-competitive behaviour(Number)		0	0	0
Did the employees participate in profits?(Y/N)	No data available	-	-	-
Existence of compliance programme(Y/N)	No data available	-	-	-

**Report notes:**

# Adverse impact

This section provides an overview of some of the SFDR's Principal Adverse Impact indicators.

Adverse impact	
Active in the fossil fuel sector	No
Sites or operations located in or near to biodiversity-sensitive areas	No
Lack of policies to monitor compliance with the UNGC principles or OECD guidelines or mechanisms to address violations their principles	No
Involved in violations of the UNGC principles or OECD guidelines	No
Involved in the manufacture or selling of controversial weapons	No

Report notes:



# ESG Policies

This section highlights which ESG-related policies are in place.

ESG Policies	
Anti-bribery and anti-corruption policy	Yes
Business travel policy	Yes
Data security and privacy policy	Yes
Diversity, equity and inclusion policy	Yes
Employee Code of Conduct	Yes
Environmental policy	Yes
ESG / sustainability policy	Yes
Gifts and hospitality policy	Yes
Health and safety policy	Yes
Human rights policy	Yes
Purchasing policy	Yes
Risk management policy	Yes
Supplier Code of Conduct	Yes
Whistleblowing policy	Yes

Report notes:

The background of the entire page is a photograph of green leaves, likely from a tree, set against a clear blue sky. The leaves are in various shades of green, with some showing prominent veins. The lighting suggests a bright, sunny day, with some leaves appearing slightly more saturated than others. The overall composition is natural and fresh.

# Sepritec ESG Report 2025

Annex

## ESG Risk & Impact Assessment

ESG Advantage conducts an automated ESG risk and impact assessment, where a high-level assessment is made of exposure to ESG or sustainability risks – including climate-related risks – and potential adverse impacts (negative impacts from the business on ESG factors).

The assessment considers the company's primary GICS sub-industry classification and the country of its headquarters, using a 5-point scale where 1 indicates low risk or adverse impact and 5 indicates high risk or adverse impact. These results are indicative and do not account for how the company manages these risks and impacts.

This assessment is relevant due to increasing regulations and reporting guidelines requiring companies to be aware of these risks and impacts, serving as a starting point for further analysis.

ESG Risk		
ESG Risk Rating	Country ESG Risk Rating	Industry ESG Risk Rating
2.1	1.8	2.3
Climate Risk		
Climate Risk Rating	Physical Climate Risk Rating	Transition Climate Risk Rating
2.6	1.9	3.3
Adverse Impact		
Adverse Impact Rating	PAI – Environmental Rating	PAI – Social Rating
1.8	1.9	1.6

**ESG Risk:** The ESG Risk Rating averages the Country ESG Risk Rating and the Industry ESG Risk Rating, providing a comprehensive evaluation of the potential impact of ESG factors on the financial value of companies operating within specific countries and industries. This rating provides valuable insights for investors and decision-makers to make informed choices regarding sustainability and risk management.

**Climate Risk:** The Climate Risk Rating averages the Climate Physical Risk score and the Climate Transition Risk rating. The Climate Physical Risk score assesses the climate-driven hazards, exposure, vulnerability, and coping capacity of companies in the industry and country of operation. The Climate Transition Risk rating assesses the risks associated with the transition to a low- carbon economy in the industry and country of operations.

**Adverse Impact:** The Adverse Impact Rating averages the PAI Environmental Rating and the PAI Social Rating. The PAI Environmental rating assesses the potential negative impacts that companies within the industry and country of operation may have on environmental factors. The PAI Social rating assesses the potential negative impacts that companies within the industry and country of operation may have on social factors.

## Theme Performance Overview

Please see below an overview of the tailored ESG performance descriptions for each selected material ESG theme.

# Carbon footprint management – Performance Overview

**Rationale:** MJ Hudson's evaluation based on our maturity scale methodology

1. Reactive	2. Involved	3. Committed	4. Integrated	5. Future proof
Reactive ESG management driven by regulations.	Ambition to improve ESG has been formulated, baseline identified and initial progress mode.	Strategy for improved ESG risk and opportunity management has led to strong performance.	Company-wide integration of ESG has brought a future-proof business within reach.	Business proposition and management is fully aligned with a future-proof society.
<ul style="list-style-type: none"> <li>Management aims to adhere to (local) energy regulations (i.e. EED (EU), ESOS (UK), Wet Milieubeheer (NL))</li> <li>No insight into employee commuting &amp; business travel</li> </ul>	<ul style="list-style-type: none"> <li>Basic monitoring of energy and carbon emissions and targets set for net-zero before 2050 (Scope 1 + 2)</li> <li>Ad-hoc initiatives to improve business travel sustainability</li> <li>&gt;70% of the electricity is sourced from renewable sources (not necessarily local)</li> <li>Energy audit conducted and quick-wins addressed (e.g. procurement of green electricity)</li> </ul>	<ul style="list-style-type: none"> <li>Comprehensive monitoring of Scope 1 + 2 emission sources according to recognised accounting standards (e.g. CO2 Prestatieladder, GHG Protocol)</li> <li>Encouraging video conferencing, including monitoring of avoided emissions due to avoided flights</li> <li>Monitoring emissions resulting from business travel and employee commuting</li> <li>Onsite renewable energy generation potential assessed (e.g. rooftop potential assessed for solar panels)</li> <li>&gt;90% of electricity is derived from local renewable sources</li> <li>Scope 1, 2 and 3 emission target for net-zero before 2045 set and officially committed to Science-Based Target Initiative (SBTi)</li> </ul>	<ul style="list-style-type: none"> <li>Science-Based Targets set in line with the 1.5°C climate scenario (X ≥ 4.2% annual linear reduction)</li> <li>All distances reachable within 6 hours by train are travelled by train</li> <li>Onsite renewable energy generation deployed, if possible (e.g. full rooftop potential realised for solar panels)</li> <li>Science-Based Targets set in line with well-below 2°C climate scenario (X ≥ 2.5% annual linear reduction) on business travel emissions</li> </ul>	<ul style="list-style-type: none"> <li>Net-zero emissions achieved for Scope 1 and 2</li> <li>Employees only commute by bike, public transport or electric vehicles</li> <li>Net-zero carbon footprint achieved (business travel reduced to absolute minimum)</li> <li>Total energy consumption reduced to absolute minimum</li> <li>Year-on-year progress realised on Scope 3 emissions of at least 2.5% linear annual reduction rate (in line with SBTi)</li> </ul>



# Compliance and risk management – Performance Overview

**Rationale:** Hemos valorado los riesgos y estamos implantado las medidas para mitigar esos riesgos.

1. Reactive	2. Involved	3. Committed	4. Integrated	5. Future proof
Reactive ESG management driven by regulations.	Ambition to improve ESG has been formulated, baseline identified and initial progress mode.	Strategy for improved ESG risk and opportunity management has led to strong performance.	Company-wide integration of ESG has brought a future-proof business within reach.	Business proposition and management is fully aligned with a future-proof society.
<ul style="list-style-type: none"> <li>Management aims to adhere to regulatory standards</li> <li>Ad hoc employee compliance training in place to comply with relevant regulations</li> <li>Manual (i.e. ad hoc) compliance incident recording and reporting</li> </ul>	<ul style="list-style-type: none"> <li>Risk management system in place</li> <li>Accountability of risks assigned to a group (no owner)</li> <li>Whistle-blowing policy in place or anonymous mechanisms to report concerns</li> <li>Policies in place addressing governance and compliance risks (e.g. CoC, anti-corruption &amp; bribery, export controls, etc.)</li> <li>Formalised compliance program with risk assessments not fully integrated and formalised (e.g. across particular business units and/or not regular)</li> </ul>	<ul style="list-style-type: none"> <li>Third-party compliance risk assessment conducted in the last two years, including formal follow-up</li> <li>Compliance programme integrated across business units, with a plan for internal auditing as well as occasional third party review</li> <li>Risk management responsibilities and accountability are formally allocated to senior and middle management as risk owners</li> <li>Annually risk assessment KPIs and/or targets</li> <li>Annual monitoring and reporting of compliance control effectiveness</li> <li>Governance policies circulated amongst all employees and relevant business partners</li> <li>Formal compliance policy implemented, including annual review</li> </ul>	<ul style="list-style-type: none"> <li>Continuous compliance improvement cycle</li> <li>Tangible progress on risk management, only low/medium risks identified in risk assessment</li> <li>No compliance related incidents in the last 5 years</li> <li>Continuously improved feedback loops between managers and employees</li> <li>Role-specific training program in place for employees to strengthen individual risk management awareness</li> <li>Independent and/or automated control effectiveness reviews routinely monitored throughout the year</li> <li>Compliance is integrated with business and strategic objectives</li> <li>The board is aware of the compliance program and actively monitors its implementation (practice what you preach)</li> </ul>	<ul style="list-style-type: none"> <li>Complete mitigation of anti-bribery and corruption risks across the full chain</li> <li>Active force for wider adoption of anti-corruption measures</li> <li>Company plays leading role in anti-corruption initiatives in sector or geography</li> <li>Anti-bribery and corruption risk mitigation is fully integrated in procurement processes</li> </ul>



# Data protection & customer privacy – Performance Overview

**Rationale:** MJ Hudson's evaluation based on our maturity scale methodology

1. Reactive	2. Involved	3. Committed	4. Integrated	5. Future proof
Reactive ESG management driven by regulations.	Ambition to improve ESG has been formulated, baseline identified and initial progress in place.	Strategy for improved ESG risk and opportunity management has led to strong performance.	Company-wide integration of ESG has brought a future-proof business within reach.	Business proposition and management is fully aligned with a future-proof society.
<ul style="list-style-type: none"> <li>• Little to no governance or risk &amp; compliance planning, actions taken if needed</li> <li>• Data security efforts are driven by local regulation (e.g. GDPR in EU)</li> </ul>	<ul style="list-style-type: none"> <li>• Regular self-assessment or Plan Do Check Act (PDCA) cycle, Information Security Life Cycle or equivalent in place</li> <li>• Full privacy notice is publicly available</li> <li>• Incident/breach management process is in place</li> <li>• Data security and privacy training provided to key employees</li> <li>• Data security management system in place including for physical data assets</li> </ul>	<ul style="list-style-type: none"> <li>• Developed organisational structures with specific data security &amp; privacy roles assigned (e.g. top-level mgmt. DPO, security officer, project manager)</li> <li>• All employees receive data privacy and security training relevant to their role</li> <li>• ISO 27001 in place and/or SOC2/ISO27701 certification in place.</li> <li>• Third-party risk assessments performed</li> </ul>	<ul style="list-style-type: none"> <li>• Company-wide action plan, KPIs &amp; targets for improvement of PDCA cycle, and IT systems in place</li> <li>• PDCA executed to evaluate and update processes on at least an annual basis</li> <li>• A PDCA cycle is embedded into all levels of the organisation with external auditing, allowing for follow-up and resolution (at least bi-annually)</li> <li>• Data security and privacy training delivered to all employees</li> </ul>	<ul style="list-style-type: none"> <li>• Industry-leading preventative approach to continuous data security &amp; privacy management</li> <li>• Best practice is supported by the absence of data privacy and security incidents in the last 3 years (cyber security breaches, GDPR incidents, data leaks)</li> <li>• PDCA improvement and continuity processes are embedded into company-wide operations</li> <li>• Continuous protocol and response testing in place</li> </ul>

# Data protection and cybersecurity – Performance Overview

**Rationale:** MJ Hudson's evaluation based on our maturity scale methodology

1. Reactive	2. Involved	3. Committed	4. Integrated	5. Future proof
Reactive ESG management driven by regulations.	Ambition to improve ESG has been formulated, baseline identified and initial progress mode.	Strategy for improved ESG risk and opportunity management has led to strong performance.	Company-wide integration of ESG has brought a future-proof business within reach.	Business proposition and management is fully aligned with a future-proof society.
<ul style="list-style-type: none"> <li>Plan in place to classify managed data, map data flows, and analyse gaps in data protection (e.g. through data protection Impact Assessments)</li> <li>Full privacy notice publicly available</li> <li>Public Information security statement available</li> <li>Data security &amp; privacy training provided to key employees</li> <li>Privacy Officer (PO) or, if legally required, Data Protection Officer (DPO) in place</li> <li>Incident/breach management process including protocol for alerting authorities to breaches of GDPR</li> </ul>	<ul style="list-style-type: none"> <li>Data security management system in place, including physical controls for on-premises data</li> <li>Cyber liability insurance is in place</li> <li>Data inventory (a.k.a. record of processing activities) for personal data activities.</li> <li>Data security and privacy policies in place</li> <li>Privacy assessments performed annually</li> <li>Security and privacy audits performed annually</li> <li>Dedicated security and privacy team (beyond DPO, maybe a third party)</li> </ul>	<ul style="list-style-type: none"> <li>PDCA (plan, do, check, act) cycle executed to evaluate and update processes annually. Company-wide action plan, KPIs &amp; targets for data security in place</li> <li>Business continuity/disaster recovery process in place with recovery test performed periodically</li> <li>Regular penetration and vulnerability testing</li> <li>Third-party risk assessment audits conducted bi-annually</li> <li>ISO2700, SOC2, or ISO27701 certification in place</li> <li>All employees receive data privacy and security training</li> <li>Organisational structures designed with specific data security &amp; privacy roles across multiple levels (e.g. top-level mgmt. DPO, security officer, project manager)</li> </ul>	<ul style="list-style-type: none"> <li>Data security/privacy topics are included in top-level management decision making</li> <li>Cyber security conscious culture (e.g. enhanced employee awareness, cross-organisational commitment, internal company-wide initiatives etc.</li> <li>Supply-chain assessments (e.g. third-parties implementors/suppliers, APIs) in place</li> <li>Continuous protocol and response testing in place</li> <li>A PDCA cycle is embedded in all levels of the organisation with external auditing, allowing for follow-up and resolution (at least bi-annually)</li> </ul>	<ul style="list-style-type: none"> <li>Industry-leading preventive approach to continuous data security &amp; privacy management</li> <li>Relevant KPIs are tracked and monitored quarterly</li> <li>Cyber security is on the agenda for board meetings</li> <li>Provide training to industry peers and clients on data security &amp; privacy issues</li> <li>PDCA improvement and continuity processes are embedded into company-wide operations</li> <li>Best practice is supported by the absence of data privacy and security incidents in the last 3 years (cyber security breaches, GDPR incidents, data leaks)</li> </ul>

# Diversity, Equity and Inclusion – Performance Overview

**Rationale:** MJ Hudson's evaluation based on our maturity scale methodology

1. Reactive	2. Involved	3. Committed	4. Integrated	5. Future proof
Reactive ESG management driven by regulations.	Ambition to improve ESG has been formulated, baseline identified and initial progress mode.	Strategy for improved ESG risk and opportunity management has led to strong performance.	Company-wide integration of ESG has brought a future-proof business within reach.	Business proposition and management is fully aligned with a future-proof society.
<ul style="list-style-type: none"><li>• Compliance to local regulation (e.g. Equality Act in UK, 'Wet ingroeiquotum en streefcijfers' in NL)</li><li>• Diversity, Equity &amp; Inclusion (DEI) not taken into account during all stages of the employee lifecycle (Attraction; Recruitment; Onboarding; Development; Retention; Separation)</li></ul>	<ul style="list-style-type: none"><li>• DEI policy in place covering the most material considerations</li><li>• Ad hoc initiatives in place to improve DEI (e.g. unconscious bias training)</li><li>• Quick-wins captured across the employee lifecycle</li></ul>	<ul style="list-style-type: none"><li>• DEI strategy in place covering all relevant dimensions (e.g. gender, social background, neurological diversity)</li><li>• Dedicated monitoring and reporting infrastructure in place (e.g. employee sentiment, pay gaps) with subsequent targets and action plans</li><li>• DEI strategy and vision is actively communicated with employees and key stakeholders</li></ul>	<ul style="list-style-type: none"><li>• Consistently strong DEI performance evidenced by positive employee sentiment and performing above industry benchmarks on key DEI KPIs</li><li>• Processes in place to eliminate institutional inequalities and biases across the employee lifecycle (e.g. gender neutral parental leave, back-to-work programs, blind CV screening)</li></ul>	<ul style="list-style-type: none"><li>• DEI performance is considered industry leading, with DEI integrated into every stage of the employee lifecycle and performance regularly reviewed</li><li>• Workforce experiences equal opportunities and the elimination of institutional biases (including wage gap), and can be considered diverse across multiple characteristics at all levels (e.g. employees, management, board)</li><li>• Company actively positions itself as a DEI leader to external stakeholders and its talent pool (e.g. by signing up to industry initiatives, hosting DEI related events)</li></ul>

# Employee engagement & well-being – Performance Overview

**Rationale:** MJ Hudson's evaluation based on our maturity scale methodology

1. Reactive	2. Involved	3. Committed	4. Integrated	5. Future proof
Reactive ESG management driven by regulations.	Ambition to improve ESG has been formulated, baseline identified and initial progress made.	Strategy for improved ESG risk and opportunity management has led to strong performance.	Company-wide integration of ESG has brought a future-proof business within reach.	Business proposition and management is fully aligned with a future-proof society.
<ul style="list-style-type: none"> <li>No policies in place, employee engagement managed on an ad hoc basis</li> <li>Diversity, Equity &amp; Inclusion (DEI) not taken into account, beyond regulatory requirements</li> <li>Obligatory learning opportunities in place (e.g. compliance, GDPR)</li> <li>Informal monitoring of turnover and absenteeism. No improvement plans in place</li> <li>Employee well-being is not measured and there are no specific initiatives in place or benefits provided</li> </ul>	<ul style="list-style-type: none"> <li>Informal HR and employee guidelines available</li> <li>Ad hoc initiatives in place to improve DEI (e.g. unconscious bias training)</li> <li>Market-conforming educational and vocational L&amp;D in place</li> <li>Monitoring of new hires, turnover, and absenteeism. Targets set in line with industry benchmarks. Risks on work-related issues are mitigated (e.g. musculoskeletal disorders, stress)</li> <li>Employee satisfaction and well-being managed on an ad hoc basis and quick-wins are implemented by HR. Employees have annual evaluation periods with their supervisor/manager</li> </ul>	<ul style="list-style-type: none"> <li>Company-wide HR policy and employee handbook in place</li> <li>DEI strategy in place covering all relevant dimensions (e.g. gender, social background, neurological diversity)</li> <li>L&amp;D offerings in place tailored to employees' needs, and personal L&amp;D budget available for everyone</li> <li>Continuous monitoring of turnover and absenteeism. Figures are below industry benchmark</li> <li>Employee well-being is monitored and discussed on management level annually and basic secondary benefits are in place (e.g. trust person, flexible working hours).</li> <li>Employee satisfaction survey conducted annually with scores above industry average and formal follow-up. Formal evaluation system including 360 feedback in place</li> </ul>	<ul style="list-style-type: none"> <li>Company-wide HR policy and employee engagement strategy reviewed regularly with employees</li> <li>Processes in place to eliminate institutional inequalities and biases across the employee lifecycle (e.g. gender neutral parental leave, back-to-work programs, blind CV screening)</li> <li>Extensive L&amp;D opportunities provided, including budget which &gt;70% of employees use annually</li> <li>Turnover and absenteeism rates are below industry benchmark for &gt;3 years</li> <li>Employee well-being is monitored and reported to management monthly. Programme available, including extensive set of benefits</li> <li>Evaluation system focused on personal development twice a year, 360 feedback including transparency on promotion and growth potential. Exit interviews are conducted</li> </ul>	<ul style="list-style-type: none"> <li>Employee satisfaction results are in the highest quartiles for &gt;5 years. Employees have evaluation discussions twice a year based on their development needs and self-assessments</li> <li>DEI performance is considered industry leading, with DEI integrated into every stage of the employee lifecycle and performance regularly reviewed</li> <li>L&amp;D budget in place that &gt;85% of employees use annually</li> <li>Turnover and absenteeism rates are below industry average for &gt;5 years</li> <li>Well-being is a main agenda item in board meetings and monitored continuously. A wide range of offerings are in place (e.g. coaching, healthy food, team events etc.)</li> </ul>

# Integration of ESG strategy – Performance Overview

**Rationale:** MJ Hudson's evaluation based on our maturity scale methodology

1. Reactive	2. Involved	3. Committed	4. Integrated	5. Future proof
Reactive ESG management driven by regulations.	Ambition to improve ESG has been formulated, baseline identified and initial progress mode.	Strategy for improved ESG risk and opportunity management has led to strong performance.	Company-wide integration of ESG has brought a future-proof business within reach.	Business proposition and management is fully aligned with a future-proof society.
<ul style="list-style-type: none"> <li>No ESG statement on the website and no other (external) visibility with regards to ESG</li> <li>No (internal or publicly disclosed) ESG policy or strategy (including materiality assessment, KPIs and targets) in place</li> <li>ESG is discussed on an ad hoc basis on the board agenda (mostly from a risk or cost efficiency perspective)</li> <li>ESG criteria are not included in the remuneration policy and/or incentives are not linked to sustainability performance</li> </ul>	<ul style="list-style-type: none"> <li>Limited ESG statement on the company website</li> <li>Limited (internal or publicly disclosed) ESG policy, and/or ESG strategy (including materiality assessment, KPIs and targets) in place</li> <li>Limited ESG-related memberships, industry standards and/or certifications in place</li> <li>Limited C level ESG accountability and responsibilities are in place</li> <li>Limited ESG incentive schemes in place (&lt;5% of management bonus)</li> </ul>	<ul style="list-style-type: none"> <li>ESG (internal or publicly disclosed) policy in place</li> <li>ESG (internal or publicly disclosed) strategy in place (including materiality assessment, KPIs, and targets, such as ensuring minimalised product disposal effects or mitigated ESG risks)</li> <li>ESG-related memberships, industry standards and/or certifications are in place</li> <li>ESG is formally discussed at the board level on a regular basis, also including more strategic value creation topics (instead of solely ESG risk mitigation)</li> <li>Incentives for ESG performance are in place (between 5% and 15% of management bonus)</li> </ul>	<ul style="list-style-type: none"> <li>ESG policy and strategy (including materiality assessment, KPIs, and targets) are updated annually and communicated to stakeholders (e.g. through public disclosure)</li> <li>YoY progress on ESG strategy integration is demonstrated</li> <li>On track to reach ESG (KPI) targets</li> <li>ESG is formally discussed at the board level on a regular basis, also including more strategic value creation topics (instead of solely ESG risk mitigation) and tangible ESG board oversight progress is demonstrated (YoY)</li> <li>Incentives for ESG performance are pioneering the sector (&gt;15% of management bonus)</li> <li>Dedicated manager in place that oversees the ESG integration performance of the company</li> </ul>	<ul style="list-style-type: none"> <li>The company's ESG measures and strategy (including materiality assessment, KPIs, and targets) are amongst the top of the industry and peers, as well as demonstrating (best-practice) results</li> <li>Initiator/frontrunner of ESG strategy initiatives and pushing ESG standards in the industry</li> <li>ESG board oversight acts as a role model for the sector and/or other organisations (e.g. board is strongly involved in the company's ESG processes)</li> <li>Incentives for sustainability performance are pioneering the sector (&gt;15% of management bonus)</li> <li>Dedicated business unit in place that oversees and executes the ESG integration plan of the company</li> </ul>





