

HUMAN RIGHTS

LABOR

ENVIRONMENT

ANTI-CORRUPTION



ELEVATE 2019-2020 ESG REPORT

ELEVATE

Business Driven Sustainability

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About this report



This report discloses our Environment, Social and Governance (ESG) performance for the calendar years 2019 and 2020. It describes who we are, what we do, how we approach ESG and how we enable change through our impact framework aligned with the Ten Principles of the United Nations (UN) Global Compact.

This disclosure includes a CEO statement of continued support for the UN Global Compact and its ten principles, our policies, and actions to uphold these principles and measurement of outcomes. It is guided by best practices and principles for report content and quality including materiality, accuracy, balance, clarity, comparability, reliability, and timeliness. We recognize there is always opportunity for improvement and welcome feedback on this report.

Letter from our CEO



Dear ELEVATE stakeholders,

As we publish this report in early 2021, we are still managing the challenges presented by the COVID-19 pandemic. This report presents our ESG performance for 2019 and 2020 in alignment with the **Ten Principles of the UN Global Compact** and the actions we intend to take in our continued commitment to support and advance these principles, but we also reflect on our current position as of April 2021 and our future plans.

I would like to open this report by acknowledging the resilience and commitment of ELEVATE staff around the world. Staff who are critical to the work we deliver, who work on behalf of our clients in challenging conditions and who push themselves and each other to consistently deliver high quality industry disrupting services. The last year has brought out the best in Team ELEVATE and I am so proud to see how resilient, creative, hardworking, and compassionate they are during extraordinary times. You have my immense gratitude and respect for what you have done each day during this crisis.

In 2020 we witnessed unprecedented supply chain disruption, store and market closures, bankruptcies, and uncertainty. This meant that partnerships, contracts, and relationships were tested globally. We witnessed our customers managing that disruption and responding in different ways. The end of 2020 also delivered a renewed global focus on human rights due diligence, worker rights and carbon and scope 3 emissions in value chains. Our teams rose to the challenge to respond to the rapidly evolving operating environment and together with our clients contributed to products and approaches to enable our customers, vendors, factories, and supply chains to manage the challenge of the pandemic and build back better. In response to COVID-19 we established a working group that meant we were able to manage the impact of the pandemic on our business and our people.

For ELEVATE 2020 meant that we had to resize our company, prioritize markets, and invest in new products. In April 2021 we are a different company than we were in March 2020. We are well positioned to support our industry with tools and products that are fit for purpose and meet new market demands. In addition, we have doubled down on the products we feel will drive business driven sustainability enabled by our data and thought leaders.

The pandemic has presented the private sector with the need for radical change in ways of working and innovation. Governments, investors, civil society, and employees are leading the demand for companies to demonstrate stronger post pandemic ESG performance. We recognize our unique position in both contributing to that improved performance through our analytics, products, services, and technology, but also to living that performance through our people and operations.

I would like to express our continued support and renew our ongoing commitment to the UN Global Compact. At the same time, especially now, we reflect that we must do more than pen platitudes to commitments – we must disrupt business as usual and push for more – to ELEVATE. We welcome feedback and comments on this report from all our stakeholders.

Yours sincerely, Ian Spaulding

About ELEVATE

ELEVATE is the leading business risk and sustainability solutions provider

We deliver improved organizational performance through sustainability and supply chain assessment, advisory services, program management and analytics.



ELEVATE is the only independent sustainability and supply chain services provider with global reach, local expertise and a beyond audit assessment and improvement service portfolio. We combine this model with unique insights derived from quality data and that fuel program effectiveness and impact.

Our ambition is that ELEVATE services and analytics will be valued and be used by all stakeholders at all points in the value chain to accelerate program effectiveness and impact. This includes:



Unlocking the shared value and incentives for each group will achieve business driven sustainability at scale, motivate consistency in application and encourage integration within day-to-day business practice.

ELEVATE

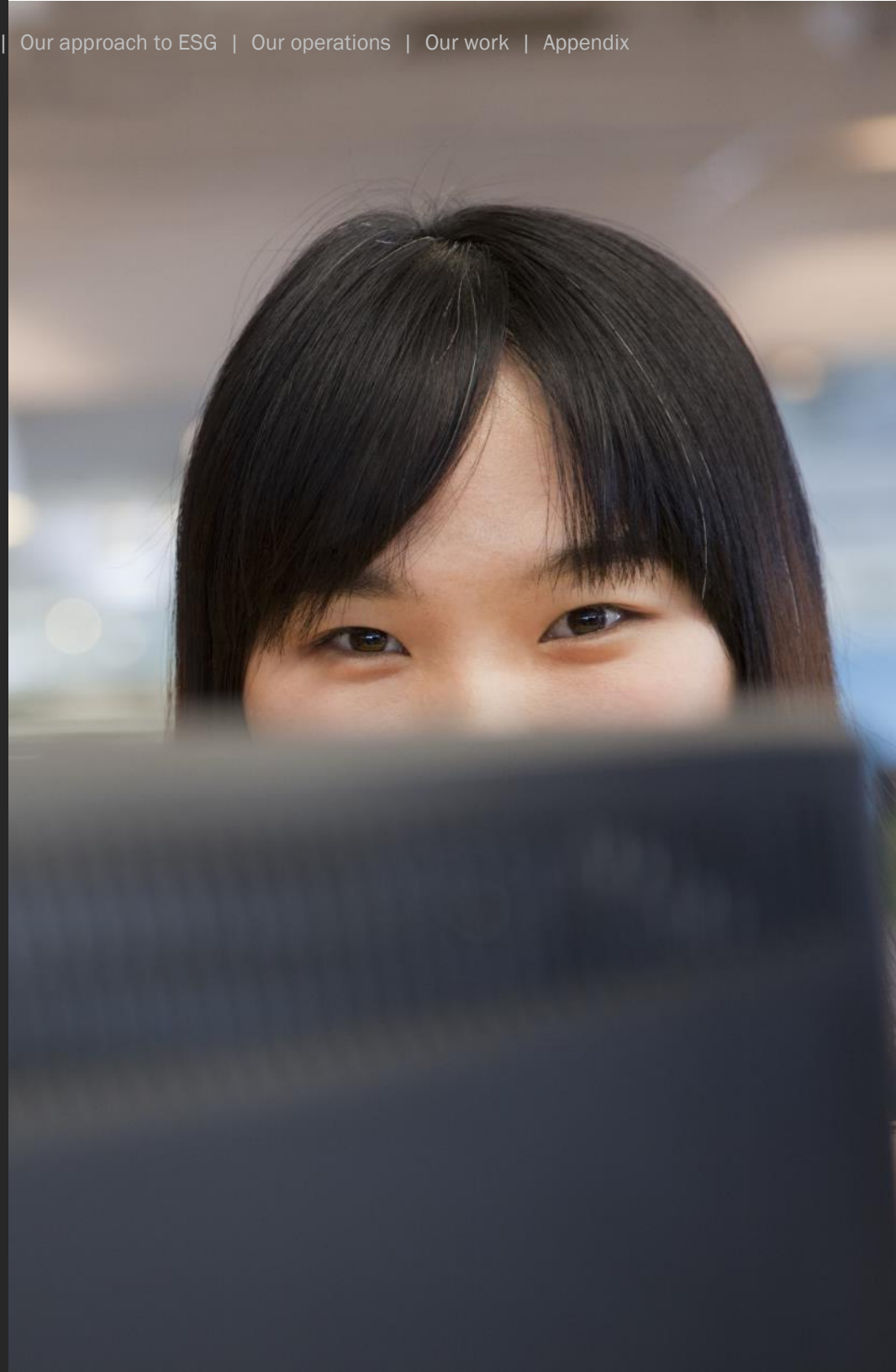
Purpose and Vision

We believe in sustainable, balanced, and inclusive economic growth.

We believe in an economic model that collectively activates business and other stakeholders to improve people's lives and preserve the planet.

This requires a commitment to transparency, visibility and the thoughtful management of risk and performance.

It requires a commitment to **Business Driven Sustainability.**









Our performance to date

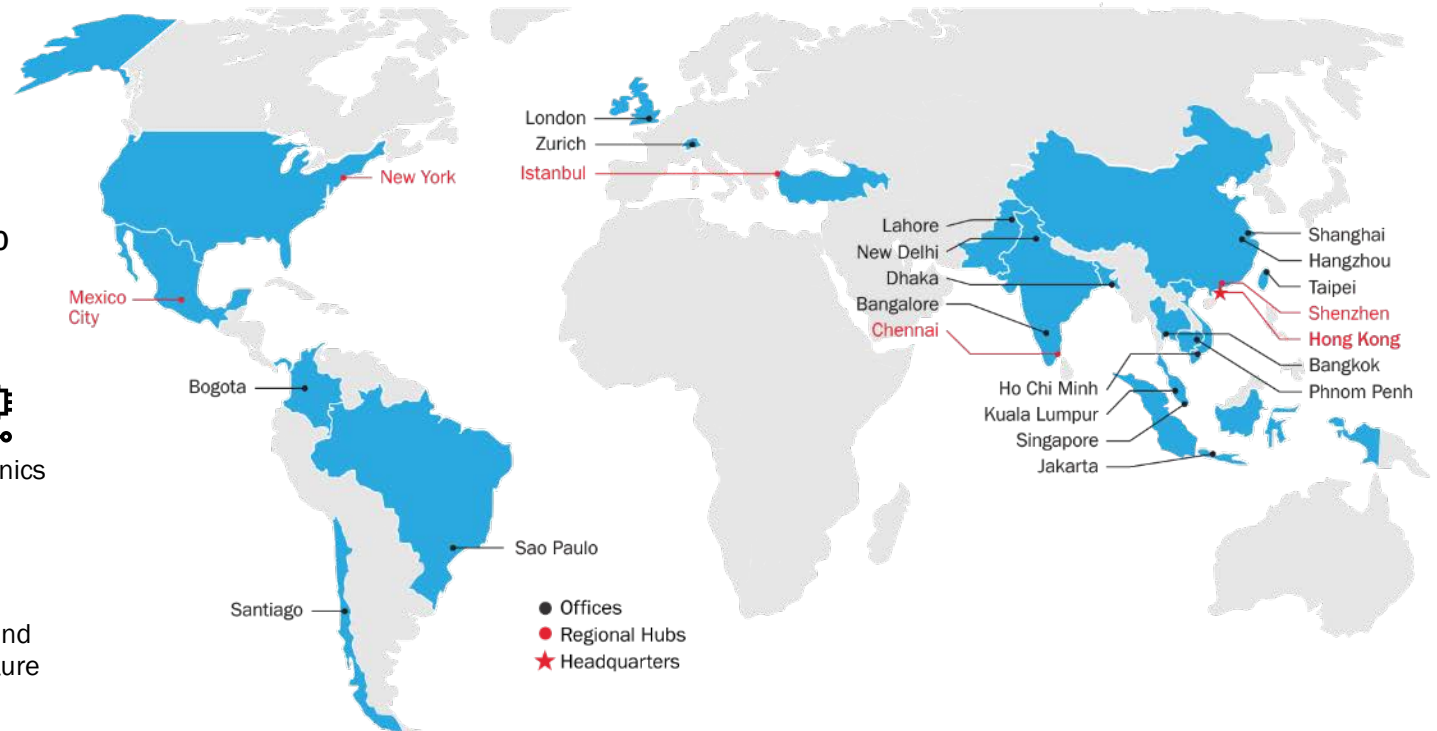
110+ countries covered	30,000+ supplier questionnaires	200+ advisory projects annually	400,000+ eLearning course completions
18,000+ annual onsite audits annually	1,000+ remote assessments	500+ workplace improvement engagements annually	1,500,000+ workers surveyed

6,800,000+ Workers positively impacted annually

Our global reach

Over **500+** people deliver work in **110** countries. We work with a variety of sectors and industries including:

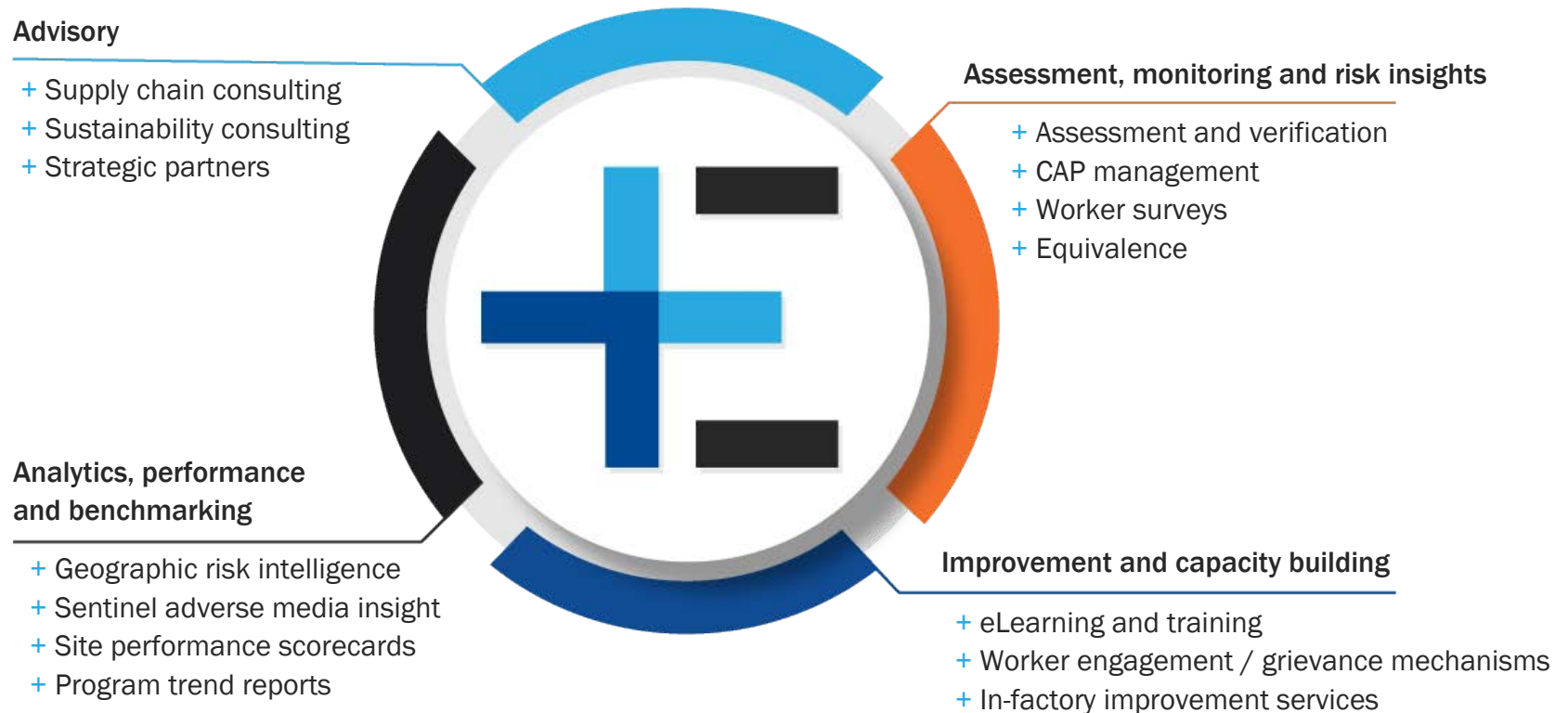
- | | | |
|---|---|---|
| 
Apparel and Footwear | 
Automotive | 
Electronics |
| 
Consumer Goods | 
Finance | 
Food and Agriculture |



Our products and services

ELEVATE delivers total program solutions spanning advisory, audit, improvement, and analytics to drive program effectiveness.

ELEVATE's best-in-class Assessment, Advisory, Program Management and Analytics services are explicitly structured to support our clients in their management of business, sustainability, and supply chain risks. The four connected pillars of our product portfolio collectively enable us to engage, influence and activate all stakeholders in the value chain around the common intention of business-driven sustainability. Delivering these programs for our clients is an important part of our business and of our contribution to the UN Global Compact ten principles.





ASSESSMENTS

Association of Professional Social Compliance Auditors (APSCA) founding company and “B” member with over 18,000 assessments per year in more than 100 countries.

ELEVATE is acknowledged throughout the industry for our best-in-class audit programs and our unique beyond-audit model that drives continuous improvement and sustained change for brands, retailers, suppliers, factories, workers, and communities alike. We enable this change through our unwavering commitment to quality, integrity, and a unique understanding of international best practice as well as on-the-ground conditions and cultural and local practices.

There is increased scrutiny on the social compliance audit space. We have been highlighting the many challenges around delivering transparent visibility around factory conditions for years. We welcome and support the scrutiny and focus on industry practices. We are actively working with our customers and other stakeholders to ensure that our industry is meeting the needs of the market and has a focus on quality and integrity. You can read more media commentary about the industry and our response [here](#).

[Learn more about our Assessment services](#)



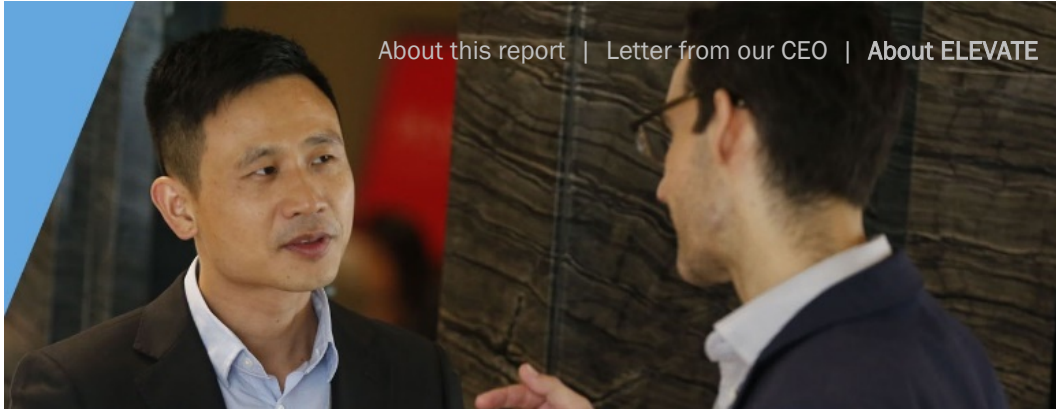
ADVISORY

Award winning sustainability reporting and value chain Advisory. Over 1.5 million workers engaged via ELEVATE Laborlink technology, more than 400,000 eLearning courses completed.

ELEVATE Advisory teams are supporting our clients to develop sustainability strategies and disclosure, responsible sourcing transformation and value creation. Our team of global experts deliver supply chain and ESG Advisory to investors, brands, retailers, vendors, and factories at all stages of maturity. Our associates work across 100 countries and have decades of experience, working from the boardroom to the field.

[Learn more about our Advisory services](#)





PROGRAMS

Expert outsourcing and Client Services teams that support the most effective program delivery.

ELEVATE is recognized for managing complex, industry-wide initiatives and programs that promote supplier ownership through support and capacity building with a focus on engagement, productivity and business driven sustainability. More detail on those programs is contained within the report.

[Learn more about our Programs](#)



ANALYTICS

Proprietary EiQ supply chain intelligence platform that delivers a comprehensive set of responsible and sustainable sourcing program analytics.

Our EiQ platform harnesses one of the best audit datasets in the industry and couples this bottom-up compliance data with top-down risk analytics by country, region, sector and product. Data from other supply chain interventions including audits, remediation, eLearning and worker engagement are blended together to generate a holistic view of risk exposure and risk management. EiQ draws on more than 15 million data points and media alerts to track, evaluate, manage and benchmark your program performance.

[Learn more about EiQ](#)



ELEVATE in 2020

Our COVID-19 response

Our historic focus on business-driven sustainability is now more pressing than ever.

The COVID-19 pandemic disrupted every aspect of our ways of working and living and in its wake, revealed glaring global inequities and an accelerating climate catastrophe. The imperative to accelerate sustainability efforts and improve industry ESG performance is more apparent than ever.

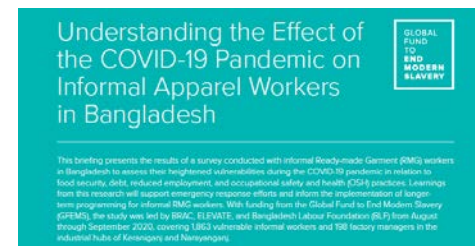
We continuously update our products and services to better support our clients in managing their impacts, develop strategies to manage emerging risks, build resilience and improve their ESG performance.



Key highlights (2019 – 2021)

- + **EIQ** – new geographic and product risk scores, enhanced site and vendor scorecards, integration of Sentinel adverse media alerts, sub-national mapping functionality, integration of data from eLearning and worker engagement, and a refreshed user experience.
- + **Developed a unique Remote Assessment protocol for sites unreachable during COVID-19.** This includes our standardized ELEVATE Responsible Sourcing Assessment (ERSA) remote questionnaires and also customized remote audits using both ELEVATE and client protocols.

- + **Launched free COVID-19 Factory Preparedness webinars in 9 different languages** (number of attendees: 851) as part of our COVID-19 Resource Centre available [here](#). Together with the Global Fund to End Modern Slavery (GFEMS) we developed a survey questionnaire which was implemented on the ground in Bangladesh by [BRAC](#) to **identify recipients in the informal apparel sector for emergency support**. [Learn more >>](#)



- + **Designed SafeStep app**. The SafeStep app is designed to build workers understanding of their rights and economic trade-offs before deciding to migrate for overseas employment. SafeStep empowers migrants to choose safer migration behaviors and channels. The app is being developed through a partnership with Diginex Solutions and Winrock International in a project funded by the Global Fund to End Modern Slavery (GFEMS) that launched in early 2020. [Learn more >>](#)

The app includes five key features for workers

SafeStep



- ✔ **Financial Literacy:** The **Budget Calculator** helps workers understand the “true” cost of migration and assess costs relative to benefits to help workers make informed financial decisions.
- ✔ **Skills and Employability:** The **User Profile** is created by registering with an email address, mobile phone number or Facebook account. Users add in professional skills that match to desired qualifications of potential employers.
- ✔ **Reliable Information on Safe Migration:** The app includes an interactive **Migration Checklist** clarifying the process and documents required for migration. An AI-powered **Help Center** features dynamic FAQs that are tailored to the worker’s specific migration corridor. **eLearning** modules give workers reliable information on pre-decision and pre-departure considerations.
- ✔ **Secure Document Storage Sharing:** The **Document Library**, aligned with the migration checklist, safely stores all required documentation needed by employers and the government for the recruitment and visa application process on the user’s phone.

- + **Acquired ‘Worker App’ to empower and surface bottom-up intelligence from both factory managers and workers in most key sourcing geographies.** The Worker App enables more visibility of working conditions, business risks and the opportunity to implement direct-to-worker capacity building programs. Such apps can also provide brands and retailers with unique 360-degree program insights, analytics, and access to a viable grievance mechanism. [Learn more >>](#)



- + **Embedded the global sustainability Advisory teams through a One Consulting approach** for entities acquired through the acquisition of CSR Asia in 2017 and BSD Consulting in 2018.

- + **Launched [Nirapon](#) to facilitate workplace safety in Bangladesh for member brands.** Nirapon remains an active user of the expanded [Amader Kotha](#) helpline that continues to be the biggest apparel sector worker helpline in Bangladesh.
- + **Awarded [U.S. Department of Labor \\$4 million cooperative agreement](#) to enhance tracing of goods made with child, forced labor and other exploitive practices as part of a four-year project.** Through this award, ELEVATE is establishing a consortium that includes the [Global Fund to End Modern Slavery \(GFEMS\)](#), [Diginex Solutions](#), [RCS Global Group](#), and the [Responsible Minerals Initiative \(RMI\)](#). The consortium partners will shape the development and publication of a supply chain and industry-agnostic commodity traceability protocol and tracing platform to equip business and other stakeholders with tools to trace their supply chains.

Learn more about our key projects and initiatives in 2019 and 2020 in the [“Our Work”](#) section below.

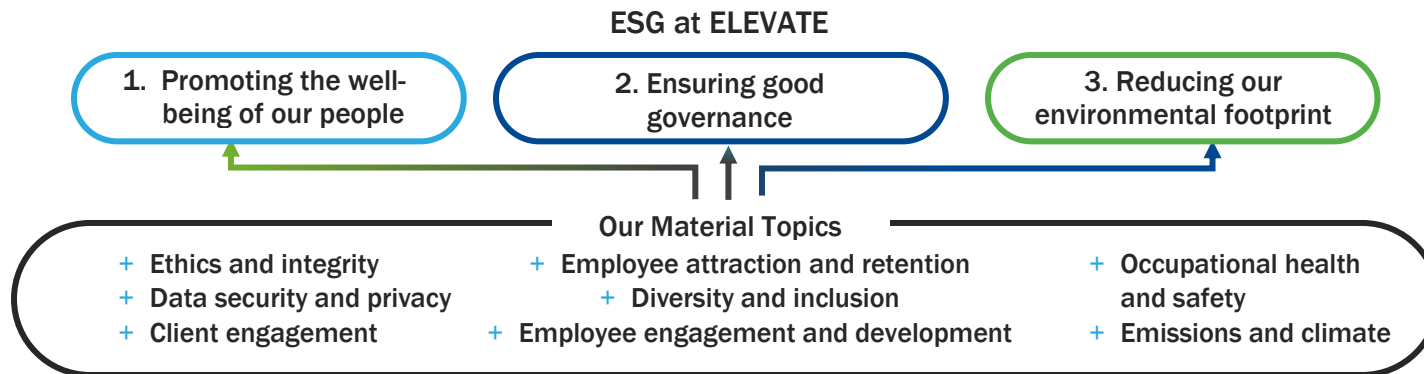
Our approach to ESG

As a services company with a mission to promote business driven sustainability, ESG for us has both an inward as well as an outward focus. We look at ESG not only in our own operations but also where we can enable and advance the services we provide for our clients and all actors in the supply chain. We measure our ESG performance both by how we manage our own operations as well as by the change we enable through our mission and vision and the work we do every day.



Managing our impact

In 2017, we conducted a materiality assessment to define and prioritize our key material issues through engagement with our stakeholders, which included employees, board members, clients, academics and thought leaders within the industry. This was presented in our [Sustainability Report 2017](#). In 2020, we reassessed and revised our assessment. This disclosure and the management of our ESG impact is aligned with eight material issues.



Learn more about how we manage our impact in the [“Our Operations - Managing our Impact”](#) section below.

Enabling change

In addition to managing ESG within our own operations, we also advance ESG through our work with our clients. Through our products and services, we support our clients in protecting human rights and promoting good working conditions in supply chains, protecting the environment, and implementing responsible business practices. This work connects directly with Sustainable Development Goal (SDG) 8 on decent work and economic growth.

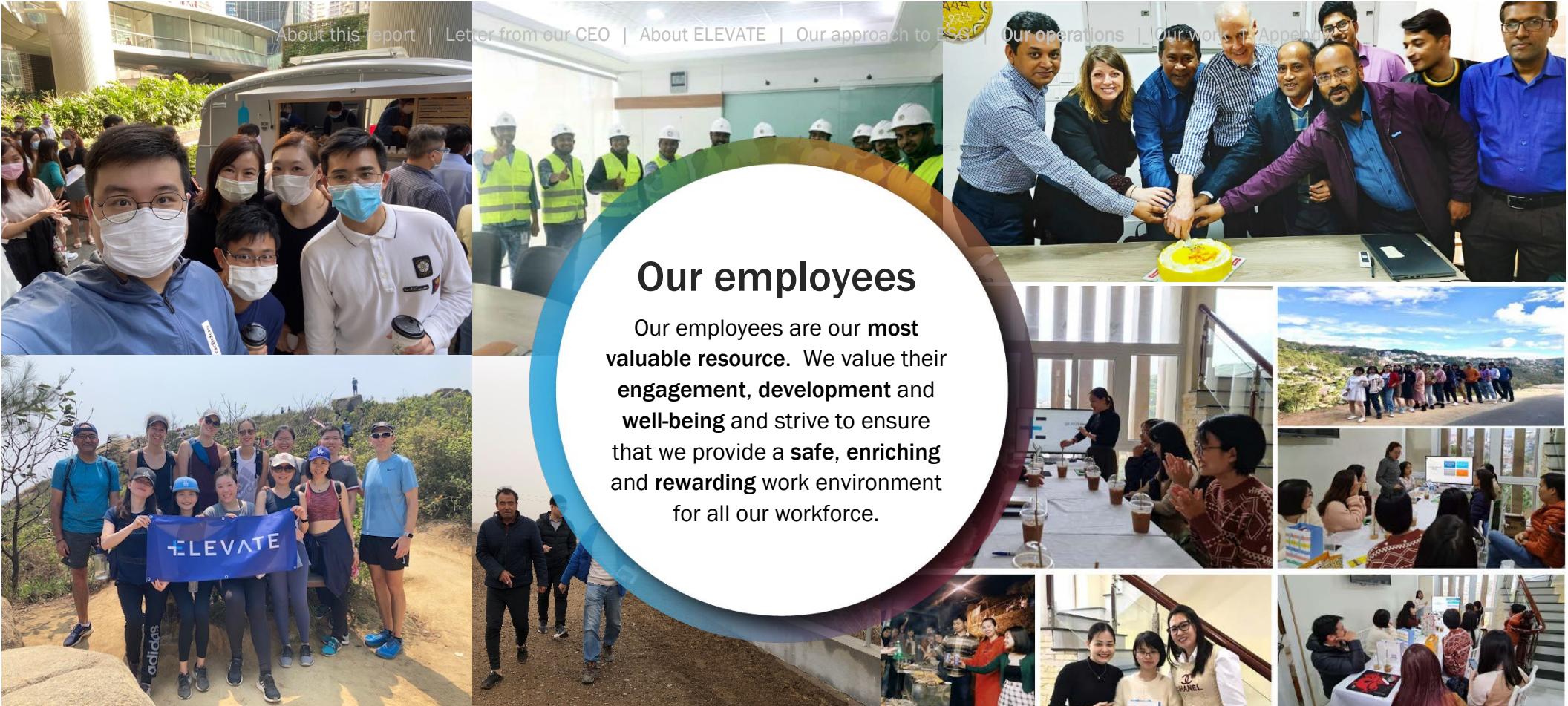


Learn more about how we enable change in the [“Our Work”](#) section below.

Our operations - managing our impact

Within our operations, we manage our environmental impact, promote the development and well-being of our employees, and implement good governance practices. Our approach, performance, and goals are set out below.





Our employees

Our employees are our **most valuable resource**. We value their **engagement, development and well-being** and strive to ensure that we provide a **safe, enriching and rewarding** work environment for all our workforce.

EMPLOYMENT POLICIES AND PRACTICES

ELEVATE is committed to treating all our employees and contractors with respect and dignity and ensuring that all labor is voluntary. There were no known instances of forced labor nor any breaches of fundamental human rights at any of our operations in 2019 or 2020. Our employment policies comply with international labor standards and cover all employees and contractors, who are informed of these policies during the on-boarding process.

- [Employment Policy](#)
- [Anti-harassment Policy](#)
- [Inclusion and Diversity Policy](#)
- [Occupational Health and Safety Policy](#)

We are fully compliant with all local labor laws and regulations.

In 2018 we embarked on a staff-led process to determine **ELEVATE Core Values**. Since then, we have used these Core Values to guide our decision making, goals and performance appraisals.



Employee training and development

We conduct an annual performance review process that gives employees the opportunity to assess their skills, identify gaps and work with management to close these gaps and meet their professional objectives. We encourage and provide opportunities for career development that include building internal communities of knowledge, training and education. Trainings and education are delivered through the ELEVATE Academy platform which facilitates global trainings for all staff and contractors. In addition, we provide learning opportunities on industry insights and trends through webinars, seminars and workshops hosted by ELEVATE leadership, as well as knowledge sharing from colleagues through our Knowledge Hubs and through Yammer, our internal communication channel.

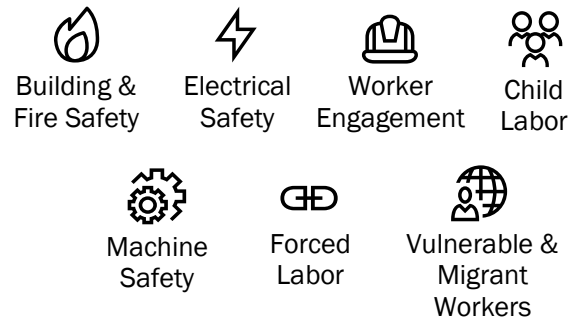


ELEVATE ACADEMY

The ELEVATE Academy offers 450+ online courses on a range of social and environmental topics.

ASSESSOR TRAINING

Our trainings develop our Assessment team's skills for advancing human rights and good working conditions in supply chains and cover topics such as:



KNOWLEDGE HUBS

We promote knowledge sharing among our employees through 2 active Knowledge Hubs:

1. Segmentation Knowledge Hub – focuses on understanding risk in global supply chains
2. Transparency and Disclosure Knowledge Hub – supports our Advisory services with guidance and best practices on reporting

Assessor trainings also incorporate the Association of Professional Social Compliance Auditors (APSCA) requirements as well as requirements from industry audit schemes that include SLCP, BSCI and IETP, among others. [Learn more >>](#)



We currently only track training hours for our Assessment staff. These performance metrics are disclosed below. As we move into 2021, we are looking at how we can formalize and record our training programs for all ELEVATE staff so that we can disclose training hours and courses across our workforce.

🔍 2019 KEY METRICS

Training and education for our Assessment Teams:
(including assessors, coordinators, and non-auditing staff)

Total # of training hours:

6,182

average 20.8 hours

Total # of Assessment Team staff participating in training/education:

358

monthly average

Training and education for Assessment staff:

Full-time assessors:

Avg. Training hours / avg. # of days:

37.46 / 4.68

Part-time assessors:

Avg. Training hours / avg. # of days:

22.3 / 2.78

🔍 2020 KEY METRICS

Training and education for our Assessment Teams;
(including assessors, coordinators, and non-auditing staff)

Total # of training hours:

5,206 ↓

average 21.13 hours

Total # of Assessment Team staff participating in training/education

314 ↓

monthly average

Training and education for Assessment staff:

Full-time assessors:

Avg. Training hours / avg. # of days;

39.44 / 4.93 ↑

Part-time assessors:

Avg. Training hours / avg. # of days;

23 / 2.87 ↑

Employee attraction and retention

We attract employees by offering opportunities to conduct impactful and meaningful work, addressing the key societal challenges we face. Working with teams of skilled sustainability professionals with deep experience on diverse topics, our employees have access to a dynamic workplace with opportunities for knowledge-sharing, collaboration, and ongoing learning. All employees participate in an anonymous annual Employee Engagement Survey that invites them to share their experiences at ELEVATE. We collate Net Promoter Scores (NPS) which are then shared with unit leaders and local teams for local improvement plans.

↩️ 2019 KEY METRICS

Total number of employees:

513

Full-time, excluding contractors

By region:

Asia: **76%** EMEA: **10%** Americas: **14%**

By employee category:

Advisory Team: **19%**

Corporate: **17%**

Field Staff: **50%**

Management: **5%**

Out-sourced Staff: **9%**

By division:

Assessment: **50%**

Advisory & Analytics: **20%**

Corporate: **20%**

Programs: **10%**

Number of internal promotions:

45

Employee turnover (voluntary):

16.7%

↩️ 2020 KEY METRICS

Total number of employees:

424 ↓

Full-time, excluding contractors

By region:

Asia: **82% ↑** EMEA: **7% ↓** Americas: **11% ↓**

By employee category:

Advisory Team: **14% ↓**

Corporate: **17%**

Field Staff: **50%**

Management: **5%**

Out-sourced Staff: **14% ↑**

By division:

Assessment: **51% ↑**

Advisory & Analytics: **16% ↓**

Corporate: **19% ↓**

Programs: **14% ↑**

Number of internal promotions:

33 ↓

Employee turnover (voluntary):

12.2% ↓

Diversity and Inclusion

Diversity and inclusion are fundamental to creating and maintaining our strong, innovative culture. We believe diversity extends to the unique styles, experiences, identities, ideas, and opinions of our employees, and is a key part of our ability to develop and accelerate high-performing teams. ELEVATE places strong emphasis on local hiring, development, and empowerment.

🔑 2019 KEY METRICS

Employees by gender:
 Female: **52%**
 Male: **48%**

Management by gender:
 Female: **40%**
 Male: **60%**

Gender diversity by employee category:

Advisory: Female: **63%** | Male: **37%**
 Corporate: Female: **59%** | Male: **41%**
 Assessment: Female: **52%** | Male: **48%**
 Management: Female: **40%** | Male: **60%**
 Out-sourced Staff: Female: **33%** | Male: **67%**

Board composition:

Male: **100%**

Internal promotion by gender:

Female: **47%**
 Male: **53%**

🔑 2020 KEY METRICS

Employees by gender:
 Female: **51%** ↓
 Male: **49%** ↑

Management by gender:
 Female: **50%** ↑
 Male: **50%** ↓

Gender diversity by employee category:

Advisory: Female: **57%** ↓ | Male: **43%** ↑
 Corporate: Female: **53%** ↓ | Male: **47%** ↑
 Assessment: Female: **50%** ↓ | Male: **50%** ↑
 Management: Female: **60%** ↑ | Male: **40%** ↓
 Out-sourced Staff: Female: **36%** ↑ | Male: **64%** ↓

Board composition:

Male: **100%**

Internal promotion by gender:

Female: **70%** ↑
 Male: **30%** ↓

Occupational Health and Safety

The primary risks faced by our employees are desk-work related injuries such as muscle strain and repetitive stress injuries and travel, security and physical risks to our in-field teams face when travelling to and visiting facilities, factories and farms.

Our health and safety protocols are outlined in our [Occupational Health and Safety Policy](#) and are supported by our Corporate Quality team as well as local leaders to identify hazards, manage risks and investigate / prevent incidents. These protocols and risks are reviewed on a monthly basis in our Risk Committee.

Protecting our employees during the COVID-19 pandemic

We developed detailed internal guidance for all our employees to help them navigate the workplace during the COVID-19 pandemic and protect both their physical as well as their mental health and the health and well-being of their families and loved ones. The communications include detailed guidance on preventative measures to implement at work including mask wearing and hand hygiene, guidelines for visitors to our offices, tips and tools to manage stress and quarantine protocols in case of exposure. The guidance is aligned with regional recommendations and protocols in the countries where we operate. In addition, we developed a comprehensive global travel policy that provides clear guidance on travel requirements to key countries, guidance for non-essential travel and precautions for all our employees to take when traveling, including specific guidelines for our field staff.



There were no incidents of workplace injury or fatalities in 2019 or 2020.

Guidance for our employees includes:

Travel safety



Hand sanitization



Masking in public



Virtual assessment tools



GOAL

ENSURING THAT ELEVATE IS A GREAT PLACE TO WORK FOR ALL OUR EMPLOYEES

Our employees are passionate about addressing global social and environmental challenges and believe strongly that business is a force for good in addressing these challenges. Their dedication, hard work, drive, and commitment is essential to helping us achieve our mission. To enable and support them in doing their best work and achieving their personal and professional goals, we strive to develop ELEVATE as a place where all our employees have the opportunity to do meaningful work that engages their curiosity and passion and is aligned with their purpose and values. Below we set out the key next steps we will take in the coming years to achieve our goals.

KEY NEXT STEPS:

1

Center employees in leadership sessions: We pride ourselves on our culture of transparency and accessibility. ELEVATE's senior leadership holds regular townhalls for employees. In 2021, we aim to focus on innovative projects and updates, led by employees and senior leaders.

2

Improve measurement of employee satisfaction: ELEVATE conducts Net Promoter Surveys (NPS) via our online people platform. We plan to examine our employee satisfaction framework to ensure that we are measuring employee concerns such as work-life balance, ways of working and efficiency of business processes and their ability to do meaningful work.

3

Update and refine our talent management framework: In 2020, our Human Resources (HR) department began updating our talent management framework to improve how we communicate with our employees on their career paths and provide them with effective professional development support. This work will continue in 2021. In 2021, we will be using an updated performance review process that also includes peer reviews to see a more well-rounded picture of employee performance and professional development needs.

4

Board diversity review: We will review our Board diversity needs as part of our commitment to diversity and inclusion.

5

Extend scope of work-related health measurement: In 2021 we will review the mechanisms we have to monitor and support best Occupational Health and Safety practices to include global tracking and mental health monitoring.

6

Improve our talent development program: We currently have a robust system for measuring employee training and development programs for our Assessment teams. There is room for improvement with our Advisory teams training program. In 2021, we will update our internal processes to accurately and systematically capture our Advisory team training hours to ensure that we are providing best-in-class development opportunities for all our employees.

7

Develop an employee centered mentoring program: In 2021, we intend to engage with employees to understand their mentoring needs and design / facilitate mentoring support in ways that works best for them. This is in alignment with our approach of centering employee voices and letting them lead in deciding how we can best support them.

8

Promote knowledge sharing: At ELEVATE, we have a rich pool of knowledge, talent, experience, and expertise. In 2020, we established employee-led structured Knowledge Hubs around our key products to promote thought leadership and staff development. In 2021, we will further develop and expand our Knowledge Hubs to additional topics and ensure that we have consistent engagement and output.

Our governance

At ELEVATE we value and prioritize ethics and integrity, transparency and compliance with all laws and regulations.

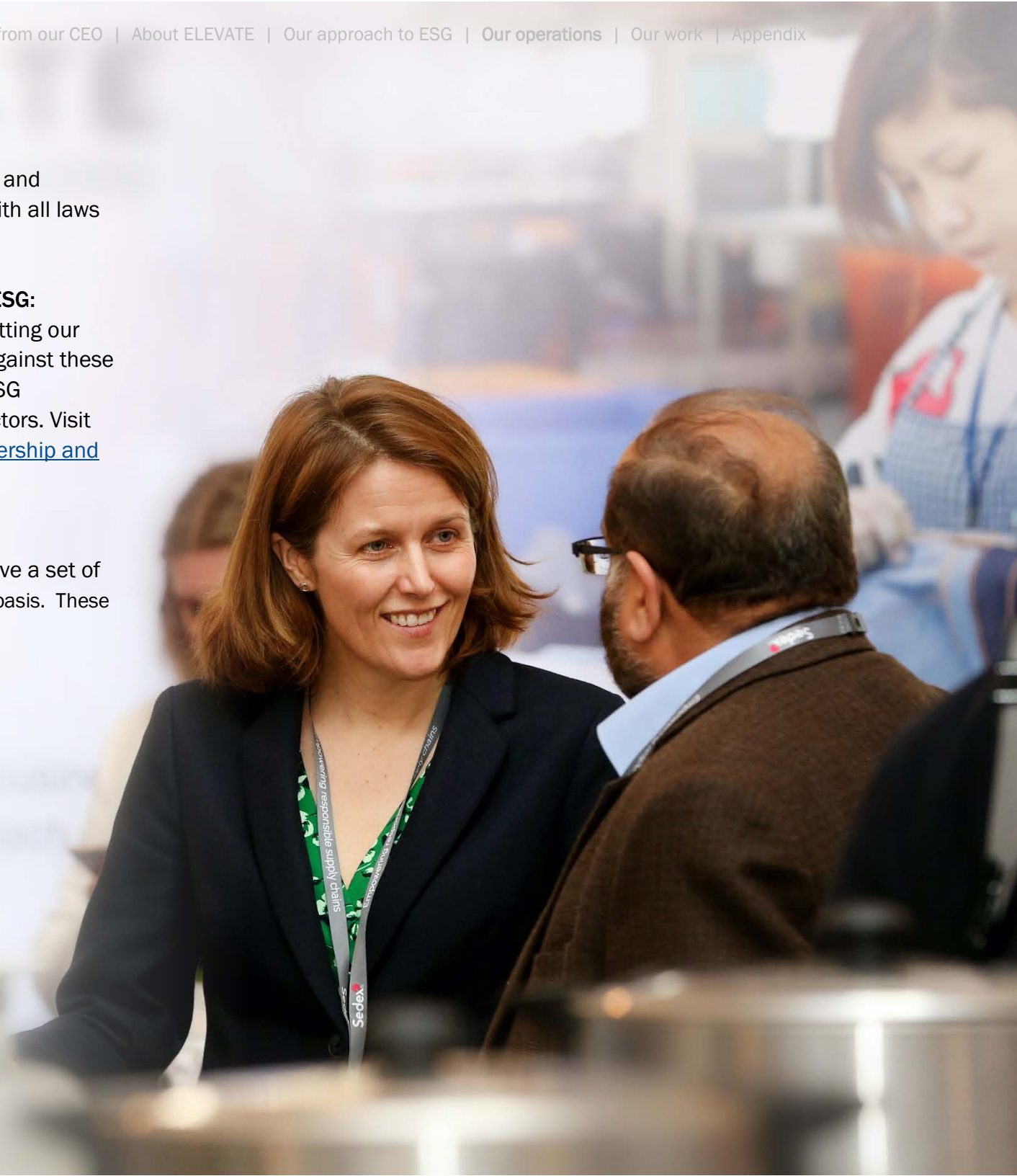
Decision-making and accountability for ESG:

Our leadership team is responsible for setting our ESG goals and evaluating performance against these goals. The leadership team reports our ESG performance to ELEVATE's Board of Directors. Visit our website to learn more about our [leadership and the Board of Directors](#).

Policies:

As part of our governance process, we have a set of policies which are reviewed on an annual basis. These policies include:


- + [Sustainability Policy](#)
- + [Impartiality Statement](#)
- + [Employment Policy](#)
- + [Occupational Health and Safety Policy](#)
- + [Alcohol and Drugs Policy](#)
- + [Anti-harassment Policy](#)
- + [Inclusion and Diversity Policy](#)
- + [Data Security and Privacy](#)



Focus on ethics and integrity

Corruption remains one of the world’s biggest challenges. It also poses serious legal, commercial, and reputational risks to our business. Our employment policy explicitly prohibits employees from offering or accepting bribes or participating in corrupt activities. This is reinforced in the ELEVATE [Code of Ethics](#) that applies to all ELEVATE employees and contractors - 100% of employees have signed our Code of Ethics. All employees are trained on our Code of Ethics as part of the onboarding process and must take our Ethics and Integrity training annually.

The Code of Ethics is designed to support the effective and transparent delivery of all products and services globally. All employees and contractors are expected to understand and comply. Violations are not tolerated. Any ELEVATE employee found to be soliciting or accepting any commission, payment, gift, service, favor or any other benefit related to their work from a client will be in breach of contract under terms of gross misconduct. This is grounds for immediate dismissal within the confines of the law.



100% of employees have signed our Code of Ethics

Grievance mechanisms

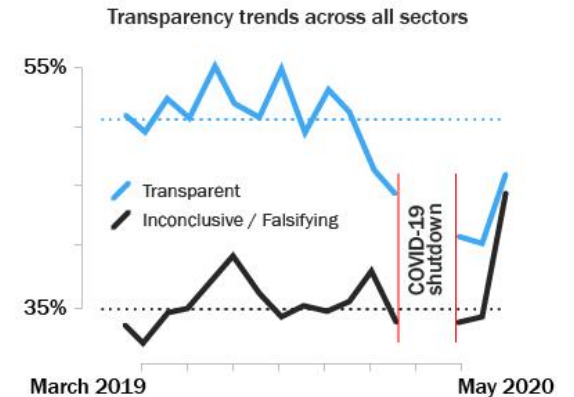
Our EthicsPoint hotline is a confidential, reporting tool, available to anyone (including employees and clients such as factories, suppliers, and brands) to report any perceived illegal, unethical, or improper conduct involving ELEVATE teams. Reporting is carried out through a secure website or a toll-free multilingual hotline. We are committed to protecting the anonymity of anyone who brings forward a claim. We do not tolerate any retaliation against the individual as outlined in the Grievance Mechanism and Remediation Statement within our Employment Policy. All allegations are taken with the utmost sincerity and reviewed using a defined internal process to create consistency across our global operations in how we handle and address all issues.

KEY METRICS	2019	2020
Number of ethics violations / complaints	14	13 ↓
Number resolved	14	13 ↓
Number of calls to ethics point hotline	6	11 ↑
Number resolved	6	10 ↑

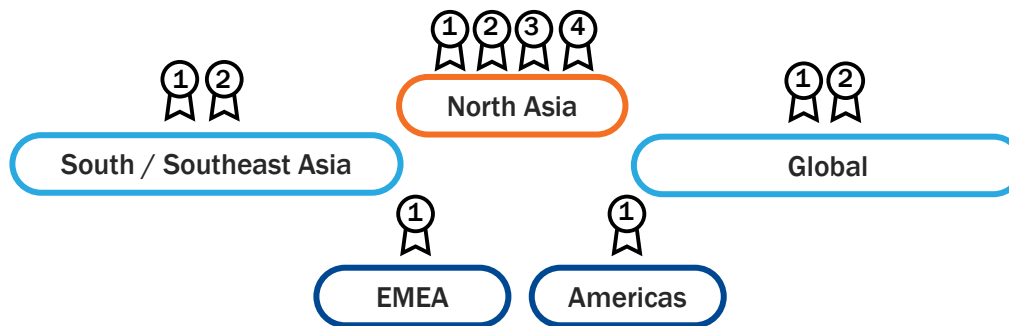
Integrity in our assessments

Integrity is critical to our success – especially now we know that COVID-19 has resulted in a deterioration of working conditions in the supply chain. COVID-19 has significantly affected transparency as measured by factory managers providing clear and authentic documentation during the audit process. With lower transparency, brands are less able to assess supply chain risk among their business partners. Lack of transparency also prevents brands from ensuring that their investments in improving or maintaining working conditions (e.g., all workers being paid their salary during the shut-down) are reflected at the factory level.

The percentage of inconclusive or falsifying factories is now higher than transparent factories. This is quite a regression. Since January 2017 transparency rates have always been greater than inconclusive or falsified rates. Our assessors play a critical role to identify and manage these risks. We do this through our company-wide Transparency Verification standard procedure, as well as a standard Bribery Reporting mechanism. Our assessors are well trained with the knowledge and skills to verify factory transparency, which not only improves the credibility of our audit findings and overall results, but also serves as an indicator for overall supply chain performance. Our assessors' integrity performance is also of paramount importance in our daily business. All assessors sign a personal commitment to ensure a fair, robust and transparent audit delivery. In 2020, several of our assessors received quality awards for their work in ensuring that our audit work meets the highest quality standards in the industry.



Quality Awards for our Assessment Teams



ELEVATE is a founding member of the Association of Professional Social Compliance Auditors (APSCA), whose mission is to enhance the professionalism, consistency and credibility of the individuals and organizations performing independent social compliance audits.

All our Assessors are either APSCA certified or are in the process of completing their

Our environmental impact

As a services company, our environmental impact is primarily in our operations, related to energy use. In 2019, our employees worked in 26 locations around the globe in offices leased by ELEVATE and co-working spaces. In 2020, we consolidated some of our office locations and most of our employees worked from home for all or part of 2020 due to the COVID-19 pandemic.

	Leased offices	Co-working offices
2019	14	12
2020	12 ↓	5 ↓

Our carbon footprint

In 2020, we conducted an exercise to measure the environmental impact of our operations. We used internal surveys and engagement to measure energy use, water use and waste at all our locations. We determined that our key environmental impact is the Greenhouse Gas (GHG) emissions we generate from the energy we use to support our ways of working. Our waste and water footprint as measured through internal surveys is minimal and employees engage in responsible practices to not waste water and to reduce and recycle waste. We focus our management approaches on how we use energy and the emissions generated from this use.

Our emissions in 2019 and 2020

Using the results of the survey, we completed our first GHG Inventory to measure our emissions. Our inventory is not complete yet, but it is the first step in our journey to comprehensively measuring and disclosing our emissions. The inventory highlighted gaps in our management systems and processes which we intend to close starting in 2021. As we improve these systems and processes, we will transparently update all past data accordingly.

GHG INVENTORY	2019	2020
Scope 2 – Indirect emissions*	76 metric tons CO2e	65 metric tons CO2e ↓
Scope 3 – Business Travel**	155 metric tons CO2e	Not reported in 2020
Scope 3 – Capital Goods***	36 metric tons CO2e	13 metric tons CO2e ↓
Emissions from remote work (Scope 3 – Employee Commuting) ****	Not reported in 2019	58 metric tons CO2e
TOTAL GHG EMISSIONS	267 METRIC TONS CO2E	136 METRIC TONS CO2E ↓

Inventory Scope:

We do not generate Scope 1 emissions

Scope 2 - Indirect emissions (purchased energy for our workforce) – reported for 2019 and 2020

Scope 3 - Employee Commuting - emissions from working at home reported for 2020, not calculated for 2019 due to insufficient data

Scope 3 - Capital goods (cradle-to-gate emissions for purchased computer equipment) – reported for 2019 and 2020

Scope 3 - Business travel – reported for 2019, travel was minimal in 2020 due to the COVID-19 pandemic, no emissions are disclosed for this category in 2020

Not included due to insufficient data: Upstream emissions generated by our technology service providers

2019:

* for electricity use at 21 of our offices, using a combination of primary energy use data, where available and proxy data for co-working and remote working using square footage, location-based method

** for 8% of employees

*** calculated using proxy data for new laptops purchased in 2019, full lifetime emissions

**** not calculated for 2019

2020:

* for electricity use at 15 of our offices, using a combination of primary energy use data, where available and proxy data for co-working using square footage, location-based method. One office in Switzerland purchased Renewal Energy Certifications for 100% of their energy use, our market-based emissions are 65,627 kg CO2e vs. 65,653 (a reduction of 26 kg CO2e)

** not reported in 2020 – minimal business travel due to COVID-19 pandemic

*** calculated using proxy data for new laptops purchased in 2020, full lifetime emissions

**** emissions from remote work, calculated for all employees in 2020 using the [Eco-Act methodology](#)

GOAL

WE AIM TO BE CARBON-NEUTRAL BY 2025

Business travel is our largest source of emissions. To achieve our goal, we will implement all internal measures to both collate our data and reduce our emissions to the best of our ability and use an off-setting strategy to mitigate our impact where we have no direct control over reductions. In 2021, we will review and improve all our current management and reduction efforts and develop an off-setting strategy.

KEY NEXT STEPS:

1

Update our internal systems and processes and engage employees: The exercise conducted to calculate our 2019 and 2020 GHG Inventory revealed required areas of improvement in our internal systems and processes on how we collect energy, travel and waste data. In 2021, we will update these systems and processes to improve completeness in our GHG inventory, in alignment with the GHG protocol.

2

Develop business travel policy: In 2021, we will develop a business travel policy that will guide leadership and employees in considering emissions when making decisions about business travel.

3

Develop e-waste policy: While we do not generate much waste in our day-to-day operations, we do generate electronic waste (e-waste) as the computers we rely on reach their end-of-life. In 2021, we will review and formalize a comprehensive e-waste policy.

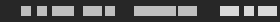
4

Develop an offsetting strategy: In 2021, we will define a clear and effective offsetting strategy that will be implemented in 2022 and each subsequent year to offset all emissions that we cannot reduce and to achieve our goal of climate neutrality. Our offsetting strategy will align with best practices and principles for purchasing carbon credits on the voluntary market (Real, Measurable, Permanent, Additional, Independently Verified, Unique) and are validated, verified and registered with credible offset standards. The strategy will take a holistic approach to using offsets to mitigate climate change by focusing both on carbon removal as well as emissions avoidance. We will explore offsets that support carbon capture and sequestration through both nature-based and technology-based solutions such as reforestation, deforestation, sustainable agricultural practices that improve the capacity of soil and land to serve as a sink for carbon and projects that capture methane, for example from landfills and animal agriculture. We will also explore projects that displace or avoid emissions from high carbon intensity energy production and use such as energy efficiency projects and projects that support the adoption and use of renewal energy.

5

Our work in supply chains: To collect and verify energy consumption at the facilities we audit in order to calculate CO₂e emissions. Applies to 75% of all audited facilities by 2025.

Our work



Our business-minded perspective and relentless focus on integrity, transparency, innovation, sustainability and measurable impact across the full value chain delivers lasting positive change for companies, brands and retailers, suppliers, factories, and workers.

Read on to find out how our work in 2019 and 2020 supported and enabled our clients to protect human rights, promote good working conditions in their supply chains, protect the environment and implement responsible business practices.



Enabling change and advancing ESG

ELEVATE's services promote human rights and good working conditions in supply chains through the products and services that we deliver globally. The ELEVATE Advisory Team works with global business to reduce their environmental impacts and manage their risks. We help clients to design and implement sustainability strategies, responsible sourcing programs, conduct human rights due diligence in their supply chains and transparently report and disclose their performance. Our analytics platform EiQ provides the business community with rich and actionable data and insights on labor, management, and environmental risks in their supply chains to support data-driven business intelligence and decision-making. Our Strategic Partner program brings the business sector together to promote collaboration and knowledge sharing and accelerate the adoption of sustainable practices.

🔑 2019 KEY METRICS

Protecting workers in supply chains

Social and environment audits completed:

17,428

eLearning training courses delivered:

79,774

Average number of monthly users

6,825

COVID-19 Wellness at Work webinar participants:

N/A

Workers reached through worker surveys (Laborlink):

1,037,523

Workers reached via ELEVATE worker helpline:

1,511,000

Corporate Engagement

Number of sustainability reports developed:

74

Number of ESG trainings (GRI, Integrated Reporting):

16

Number of ESG training participants:

245

Number of industry events:

20

🔑 2020 KEY METRICS

Protecting workers in supply chains

Social and environment audits completed:

14,139 ↓

eLearning training courses delivered

87,882 ↑

Average number of monthly users:

7,131 ↑

COVID-19 Wellness at Work webinar participants:

851 ↑

Workers reached through worker surveys (Laborlink):

1,286,829 ↑

Workers reached via ELEVATE worker helpline:

1,511,000

Corporate Engagement

Number of sustainability reports developed:

52 ↓

Number of ESG trainings (GRI, Integrated Reporting):

9 ↓

Number of ESG training participants:

124 ↓

Number of industry events:

1 ↓

COVID related cancellations

Partnerships and alliances

We partner with organizations and industry initiatives to drive transparency and sustainable change throughout the value chain. Our collaboration spans global and regional industry organizations, government bodies, NGOs, academic institutions and civil society.

Our partners representing industry initiatives include:

 <p>ALLIANCE FOR BANGLADESH WORKER SAFETY</p>	 <p>IDH ELECTRONICS PROGRAM</p>	 <p>Responsible Business Alliance</p>	 <p>APSCA™ ASSOCIATION OF PROFESSIONAL SOCIAL COMPLIANCE AUDITORS MEMBER</p>
 <p>FDRA FOOTWEAR DISTRIBUTORS AND RETAILERS OF AMERICA</p>	 <p>RILA RETAIL INDUSTRY LEADERS ASSOCIATION Educate. Collaborate. Advocate.</p>	 <p>SOCIAL & LABOR CONVERGENCE</p>	 <p>Sedex®</p>
 <p>BUSINESS SOCIAL COMPLIANCE INITIATIVE BSCI www.bsci-intl.org Member of BSCI</p>	 <p>Sustainable Apparel Coalition</p>	 <p>FAIR LABOR ASSOCIATION</p>	 <p>ICTI ethical toy program</p>

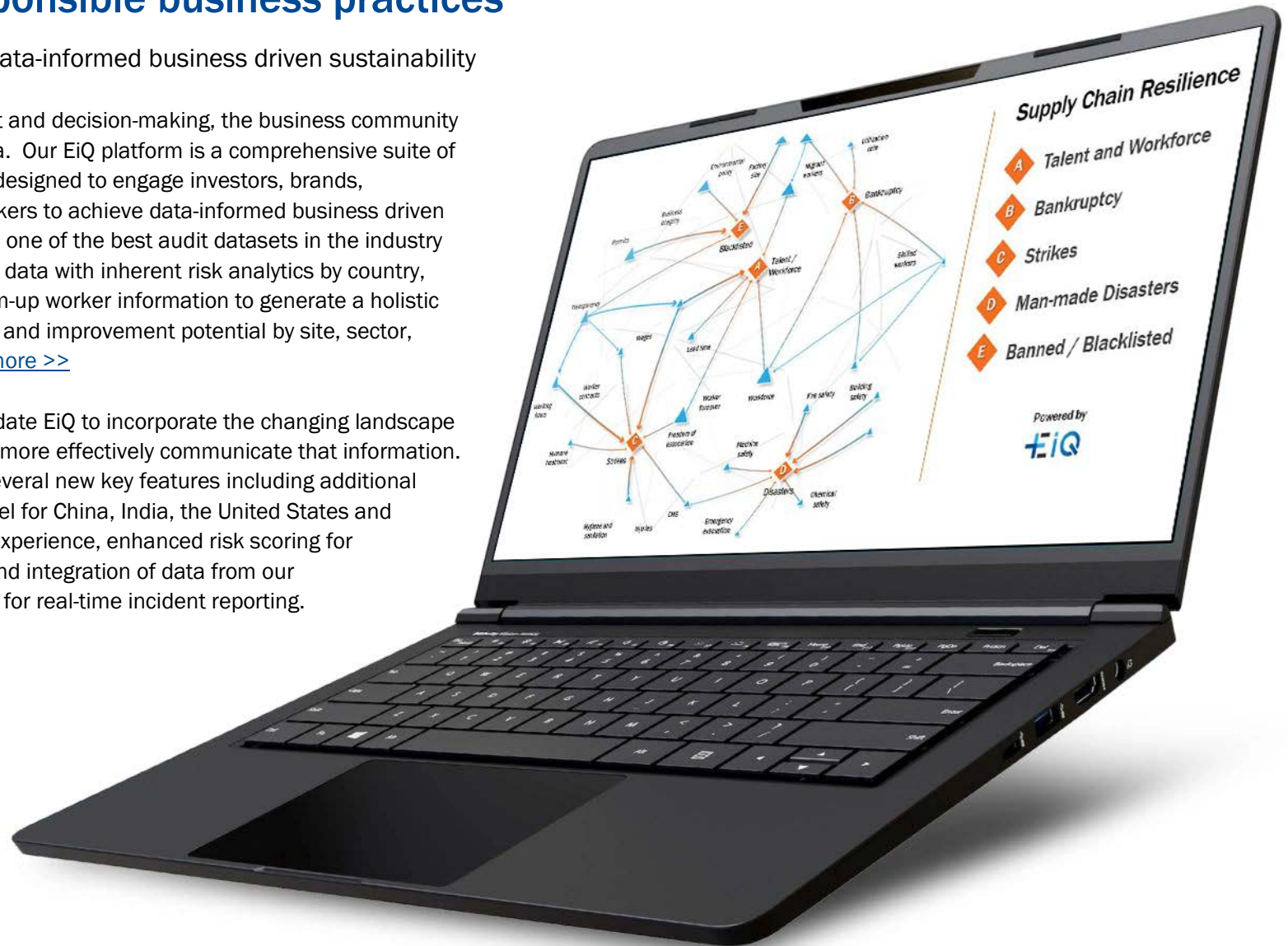
Promoting responsible business practices

Tools and platforms for data-informed business driven sustainability

For effective ESG investment and decision-making, the business community needs rigorous, credible data. Our EiQ platform is a comprehensive suite of supply chain analytics tools designed to engage investors, brands, suppliers, factories, and workers to achieve data-informed business driven sustainability. EiQ harnesses one of the best audit datasets in the industry and couples this compliance data with inherent risk analytics by country, region and sector and bottom-up worker information to generate a holistic view of performance, impact and improvement potential by site, sector, province, or country. [Learn more >>](#)

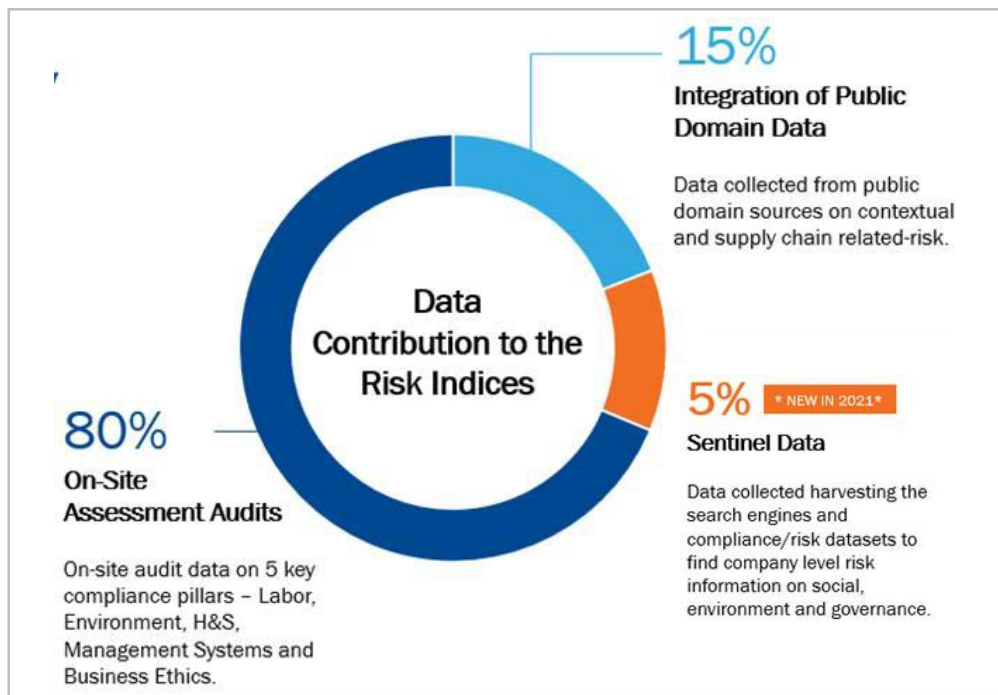
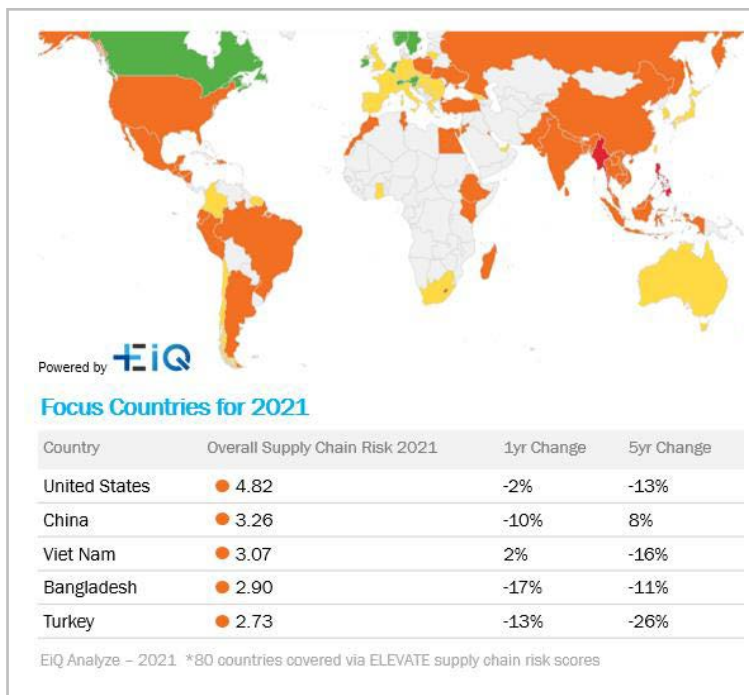
We constantly refine and update EiQ to incorporate the changing landscape of data and information and more effectively communicate that information. In 2020, EiQ incorporated several new key features including additional detail at the sub-national level for China, India, the United States and Vietnam, an improved user experience, enhanced risk scoring for “supply chain risk” indices and integration of data from our Sentinel web crawler service for real-time incident reporting.

Powered by



EiQ DATA IN ACTION

Using Predictive Analytics to address forced labor in supply chains in South Asia In January 2020, ELEVATE began partnering with the [Global Fund to End Modern Slavery \(GFEMS\)](#) with funding from the U.K. government to reduce the prevalence of forced labor via subcontracting, using predictive modelling. We are developing a predictive model to identify T1 suppliers in the apparel sector in India that subcontract to informal-sector manufacturers. Once risky suppliers are identified, ELEVATE will offer its support in the remediation process, from carrying out root cause analysis, building supplier capacity, and providing a monitoring tool and strategy. An important step toward building the predictive model is to conduct production capacity assessments at facilities in India in 2020.



Leveraging ELEVATE’s unique supply chain data, we aim to identify the key correlations between factory demographics and compliance profile, and the evidence of subcontracting to build a predictive algorithm that can effectively identify non-compliant suppliers with the greatest risk of forced labour among their subcontractors. [Learn more >>](#)

Protecting human rights and promoting responsible labour practices in global supply chains

ELEVATE's products, programs and services support the responsible management of global supply chains. In 2019 and 2020, we designed and developed several tools to enable our clients to assess specific commodities and indirect supply chains. These include amongst others: Labor Agencies, Logistics Providers, Service Provider, Cashmere and Packaging Waste Recycling and Post-Consumer Resin.

Key projects and initiatives in 2019 and 2020



MIGRANT WORKERS

Addressing recruitment fees and protecting foreign migrant workers in Malaysia - Due to the COVID-19 pandemic, global demand for rubber gloves has grown significantly to an estimated 400 to 600 billion pieces. Malaysia currently produces about 67% of the world's rubber gloves. Of the approximately 65,000 people employed in the rubber glove manufacturing industry in Malaysia, over 42,000 are foreign migrant workers, who are particularly vulnerable to exploitative labor practices. In 2020, we began working with employers and factories to guide and support the development and implementation of programs and protocols to reimburse recruitment fees for migrant worker and promote responsible recruitment practices – [Learn more >>](#)

Improving migrant worker recruitment practices in Malaysia with the Responsible Business Alliance (RBA) – as RBA's implementing partner, ELEVATE conducted research to identify factors perpetuating the conditions of exploitation and forced labor in Malaysia and played a key role in the implementation of the Responsible Worker Program through worker survey instruments, manager trainings and education.

AGRICULTURE

Giving food and agricultural workers a voice – In 2020, together with the Equitable Food Initiative (EFI), ELEVATE launched the first external reporting channel for EFI-Certified farms in the Americas (United States, Mexico, and Canada) with the potential to scale-up to other growers in the industry. As an innovative mobile-phone based tool for data gathering and reporting, Conecta has been designed to enable continuous visibility into farms working conditions through dynamic, technology-supported interaction with workers 365 days a year, in accordance with the UN Guiding Principles on Business and Human Rights definition of an “effective grievance mechanism.”



MINING

Improving the lives of artisanal gold miners in Colombia - ELEVATE is the local implementation partner of the Better Gold Initiative (BGI) in Colombia, a public-private partnership between the Swiss Government and the Swiss Better Gold Association (SGBA) whose members are key Swiss gold buyers (refiners, brands and banks). BGI’s objective is to connect small, medium, and artisanal gold miners to the Swiss buyers through the set-up of fully traceable, responsible and fair supply chains from the mines to the market. Miners complying with the SGBA’s responsible sourcing criteria (which include the OECD Due Diligence Guidelines for Responsible Supply Chain of Minerals from Conflict-Affected and High-Risk Areas) receive a prime paid by the buyer that is invested in the improvement of social and environmental conditions in mining operations and communities. The first phase of the project’s started in 2017 and is to be finalized in June 2021. A second phase is planned to be implemented between 2021 and 2025. [Learn more >>](#)



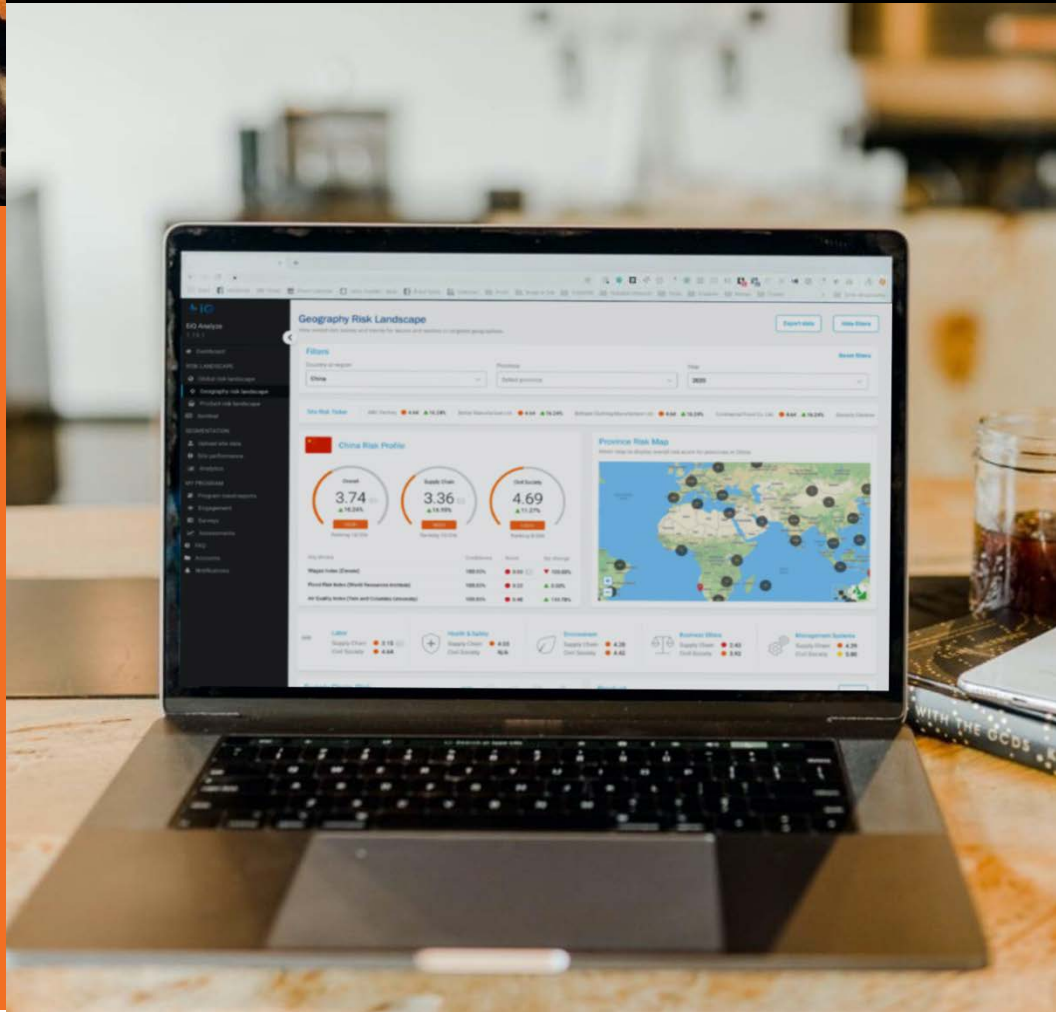


LABOR AGENCIES

Engaging Labor Agencies to protect workers – In 2018, we began working with Unilever to develop an enhanced vetting process for labor agencies, initially focusing on agencies providing workers to Unilever’s manufacturing sites. The work included specific Self-Assessment Questionnaires (SAQs), scoring systems and audit protocols, and mobile phone enabled worker surveys. In 2019, we enhanced the assessment process for labor agencies providing in-sourced temporary workers, ensuring compliance with Unilever’s Responsible Sourcing Policy using a specifically designed Self-Assessment Questionnaire (SAQ) and risk-ratings for labor agencies, followed by independent on-site assessments. In 2020, all assessments were conducted remotely because of COVID-19.

FINANCIAL


For the past decade we have been providing Advisory services to the finance sector with due diligence and ongoing portfolio management. Powered by EiQ and our Advisory teams we have supported clients to identify and evaluate existing and potential supply chain issues associated with a deal or transaction. ELEVATE acts as a social responsibility advisor to our clients ensuring that clients with ESG mandates can fulfill their human rights obligations for the purpose of evaluating the target company’s supply chain social programs.





Protecting the environment

ELEVATE supports businesses in assessing their carbon footprint and environmental impact, aligning climate and environmental policies, setting targets, developing strategies for impact management and reduction and disclosure and reporting aligned with leading standards including the Global Reporting Initiative (GRI) and Carbon Disclosure Project (CDP).

Key projects and initiatives in 2019 and 2020

 **Managing carbon in the banking sector in Brazil** – In 2020, ELEVATE prepared the first carbon inventory and comprehensive environmental assessment for Nubank, the largest Brazilian digital bank with more than 35 million clients. Our work enables Nubank to demonstrate industry leadership by becoming the first bank in Latin America to set a zero-emission goal and sets the foundation for effective management of the bank’s carbon footprint and comprehensive and transparent ongoing reporting and disclosure on performance.

 **Carbon pricing** – ELEVATE assessed options for Swiss Post, one of the longest-standing and best-known brands in Switzerland, to introduce a carbon price including identifying solutions and pathways for implementation.

 **Promoting environmentally responsible consumption in Brazil** – In 2019 and 2020, ELEVATE partnered with Topten International and WWF to set-up and maintain the Brazilian website topten.eco.br to enable responsible purchasing of home appliances. The website offers a unique platform for consumers and companies to easily compare energy and resource efficiency of electrical equipment for domestic use. In 2020, the website expanded from 2 to 6 product categories and increased the number of users significantly and is expanding in Chile, Argentina, and Peru as part of the growing Latin American platform.

SPOTLIGHT ON WASTE IN THE FOOTWEAR SUPPLY CHAIN

FDRA ELEVATE partners with the Footwear Distributors and Retailers of America’s (FDRA) Waste Management Program which seeks to ensure zero manufacturing waste to landfill or incineration in the global footwear supply chain.

In 2020, we launched a pilot program with 26 factories in China with a goal to reduce the manufacturing waste to landfill and incineration by 25%. The program successfully established baselines of waste management practices of footwear factories, demonstrated the business case and financial returns of improving waste management performance, and built suppliers’ awareness as well as capacity to implement improvement measures to drive higher waste diversion from landfill and incineration. The program exceeded expectations and achieved impressive results in reduction of waste to landfill and incineration and improvements in recycling of waste. In 2021, we will further expand the program to other sectors and regions and will also include collection of data on energy use at the factory level, enabling us to measure and quantify the carbon footprint in the supply chain.



Looking ahead – key trends

Building our supply chain environmental capacity and services is a key goal for 2021. As the public and private sector begins to take concerted action to address climate change and environmental issues, we foresee an increased need and opportunity for supporting our clients with measuring their environmental impact, setting targets and developing strategies for addressing that impact. In the near term, we see an increasing need for measuring emissions in upstream supply chains.

To support this work, we are actively deploying our tools and services to collect environmental data in factories and suppliers and support our clients with their Scope 3 GHG Inventories. In 2021 we will deliver critical research and pilot new tools for our clients to embed the verification of Scope 3 data into compliance programs. This will include testing and evaluating an adapted audit protocol that will contribute to our 2025 goal of collecting energy consumption data at 75% of all audited facilities.



Appendix: United Nations Global Compact Index

	REPORT SECTION / PAGE NUMBER / LINK
Statement of continued support by the Chief Executive Officer (CEO)	Page 4
Principle 1: Support and respect the protection of internationally proclaimed human rights.	<p>ELEVATE supports and protects human rights in our workplace – see Section “Our Employees” of this report – Page 17</p> <p>ELEVATE promotes these rights through our work with our clients – see our Purpose and Vision, Page 6</p> <p>Key policies:</p> <ul style="list-style-type: none"> o Employment Policy o Anti-harassment Policy o Inclusion and Diversity Policy o Occupational Health & Safety Policy <p>+ ELEVATE fully complies with all its policies</p> <p>+ All employees have access to grievance mechanisms through our Ethics Point Hotline</p> <p>+ We influence and promote human rights through Our Products and Services, Page 8</p> <p>+ See Page 32 of this report for 2019 and 2020 data on:</p> <ul style="list-style-type: none"> o Social and environmental audits o Supply chain training and capacity building o Worker engagement <p>+ See Page 36 of this report for our work in 2019 and 2020 to protect human rights and labor conditions in global supply chains</p>
Principle 2: Make sure that they are not complicit in human rights abuses.	There were no instances of human rights abuses at ELEVATE in 2019.

<p>Principle 3: Uphold the freedom of association and the effective recognition of the right to collective bargaining.</p>	<p>ELEVATE supports and protects labor rights in our workplace - see Section “Our Employees” of this report – Page 17</p> <p>ELEVATE promotes labor rights through our work with our clients – see our Purpose and Vision, Page 6</p> <p>Key policies:</p> <ul style="list-style-type: none"> ○ Employment Policy <p>+ ELEVATE fully complies with its Employment Policy</p> <p>+ All employees have access to grievance mechanisms through our Ethics Point Hotline</p> <p>+ We influence and promote human rights through our Products and Services, Page 8</p> <p>+ See Page 36 of this report for our work in 2019 and 2020 to protect human rights and labor conditions in global supply chains</p>
<p>Principle 4: The elimination of all forms of forced and compulsory labor.</p>	<p>ELEVATE supports and protects labor rights in our workplace - see Section “Our Employees” of this report – Page 17</p> <p>ELEVATE promotes labor rights through our work with our clients – see our Purpose and Vision, Page 6</p> <p>Key policies:</p> <ul style="list-style-type: none"> ○ Employment Policy <p>+ ELEVATE fully complies with its Employment Policy</p> <p>+ All employees have access to grievance mechanisms through our Ethics Point Hotline</p> <p>+ There were no instances of forced / compulsory labor at ELEVATE in 2019 or 2020</p> <p>+ We influence and promote human rights through our Products and Services, Page 8</p> <p>+ See Page 32 of this report for 2019 and 2020 data on:</p> <ul style="list-style-type: none"> ○ Social and environmental audits ○ Supply chain training and capacity building ○ Worker engagement <p>+ See Page 36 of this report for our work in 2019 and 2020 to protect human rights and labor conditions in global supply chains</p>

<p>Principle 5: The effective abolition of child labor.</p>	<p>ELEVATE supports and protects labor rights in our workplace - see Section “Our Employees” of this report – Page 17</p> <p>ELEVATE promotes labor rights through our work with our clients – see our Purpose and Vision, Page 6</p> <p>Key policies:</p> <ul style="list-style-type: none"> o Employment Policy <p>+ ELEVATE fully complies with its Employment Policy</p> <p>+ All employees have access to grievance mechanisms through our Ethics Point Hotline.</p> <p>+ There were no instances of child labor at ELEVATE in 2019 or 2020</p> <p>+ We influence and promote human rights through our Products and Services, Page 8</p> <p>+ See Page 32 of this report for 2019 and 2020 data on:</p> <ul style="list-style-type: none"> o Social and environmental audits o Supply chain training and capacity building o Worker engagement <p>+ See Page 36 of this report for our work in 2019 and 2020 to protect human rights and labor conditions in global supply chains</p>
<p>Principle 6: The elimination of discrimination in respect of employment and occupation.</p>	<p>ELEVATE supports and protects labor rights in our workplace - see Section “Our Employees” of this report – Page 17</p> <p>ELEVATE promotes labor rights through our work with our clients – see our Purpose and Vision, Page 6</p> <p>Key policies:</p> <ul style="list-style-type: none"> o Employment Policy o Anti-harassment Policy o Inclusion and Diversity Policy <p>+ ELEVATE fully complies with all its policies</p> <p>+ All employees have access to grievance mechanisms through our Ethics Point Hotline.</p> <p>+ See Page 22 of this report for 2019 data on our Diversity and Inclusion metrics</p> <p>+ We influence and promote human rights through our Products and Services, Page 8</p> <p>+ See Page 32 of this report for 2019 and 2020 data on:</p>

	<ul style="list-style-type: none"> o Social and environmental audits o Supply chain training and capacity building o Worker engagement <p>+ See Page 36 of this report for our work in 2019 and 2020 to protect human rights and labor conditions in global supply chains</p>
<p>Principle 7: Support a precautionary approach to environmental challenges.</p>	<p>As a services company, our environmental impact is primarily in our operations - see Section “Our Environmental Impact” of this report – Page 28</p> <p>Key policies:</p> <p>+ Sustainability Policy</p>
<p>Principle 8: Undertake initiatives to promote greater environmental responsibility.</p>	<p>See Section “Our Environmental Impact” of this report – Page 28 for how we measure and manage our environmental footprint.</p>
<p>Principle 9: Encourage the development and diffusion of environmentally friendly technologies.</p>	<p>ELEVATE promotes environmental responsibility as a central part of our Purpose and Vision, Page 6</p> <p>+ We influence and promote environmental responsibility through our Products and Services, Page 8</p> <p>+ See Page 32 of this report for 2019 and 2020 data on:</p> <ul style="list-style-type: none"> o # of sustainability reports developed o # of GRI trainings <p>+ See Page 39 of this report for our work in 2019 and 2020 to protect the environment</p>
<p>Principle 10: Work against corruption in all its forms, including extortion and bribery.</p>	<p>ELEVATE is fully committed to ethics, integrity and transparency - see Section “Our Governance” – Page 25</p> <p>ELEVATE promotes business ethics and integrity as a central part of our Purpose and Vision, Page 6</p> <p>Key policies:</p> <ul style="list-style-type: none"> o Code of Ethics o Impartiality Statement <p>+ We influence and promote ethics and integrity through our Products and Services, Page 8</p> <p>+ There were no violations of our Code of Conduct in 2019 or 2020</p>

+ELEVATE

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