



CORPORATE SOCIAL RESPONSIBILITY

Building a Culture
of Transparency

2019
REPORT

FOREWORD FROM THE CHAIR



While we were gathering the data to write Assent's 2019 Corporate Social Responsibility Report, I was tasked with quantifying the impact our business efforts have had across the globe. This was a challenge, but I knew we needed to share these stories.

Last year, we aligned our reporting with the United Nations Global Compact (UNGC) Ten Principles. Doing so enabled us to describe what we were doing internally at Assent to build a responsible, sustainable business. However, as we began to develop our report for this year, we realized our global impact extends far beyond the Ten Principles.

Our own employee and supplier networks are growing, but as a business, our work touches over 500,000 companies and millions of workers. We are influencing value chain dynamics in workforces distant from our mid-market and enterprise clients. And when the services that have propelled your company to the top of its market drive responsible actions as a means of cost efficiency, that's a profound win.

To share our tale, we took the more ambitious approach of meeting Global Reporting Initiative Core criteria. As a result, our report is more than just the story of our ethical actions.

This is the story of our business.

A handwritten signature in black ink that reads "Sarah Carpenter".

Sarah Carpenter
Chair, CSR Steering Committee

TABLE OF CONTENTS

Letter From the CEO	1
Assent Compliance: Building a Culture of Transparency	2
Economic Performance	12
Environmental Performance	19
Social Performance	28
Conclusion	37
Reporting Index.....	38

LETTER FROM THE CEO



To our stakeholders,

Assent is on a remarkable journey. We produce cloud software that continues to lead our field, and support companies in making better corporate decisions on environmental and social topics.

Our software provides industry a window into their supply chains and the factories in which their products are manufactured. We're not only changing the way they do business — we're changing how they operate their own businesses. And Assent holds itself to the same standards.

We've been recognized as one of the fastest-growing companies in Canada at our scale.

In order to maintain this growth pace, we must invest in the growth of our employees, shareholders and clients. That means providing them with education and training. It means valuing their well-being, both personally and professionally. It also means providing them with the opportunity to have a real impact in the world.

This year's CSR report provides more transparency into the work each of our departments and services are doing to drive ethical and sustainable business across the globe.

I support our company as we continue to participate in the UNGC and promote decent work in global supply chains. Together, our organizations will build the transparent work culture that leads to sustainable business results, from a foundation of strength.

A handwritten signature in black ink, which appears to read "Andrew Waitman". The signature is fluid and cursive.

Andrew Waitman
Chief Executive Officer

ASSENT COMPLIANCE: BUILDING A CULTURE OF TRANSPARENCY

Assent is the global leader in supply chain data management. Our cloud-based software centralizes the critical information companies need to protect their brand, maintain access to global markets, and reduce operational and financial risk. Managing these issues effectively drives sustainable growth and favorable business conditions.

Assent's core software offerings include:

- ▶ Supply chain data management platform.
- ▶ Software modules to manage CSR, vendor and product compliance data.
- ▶ Data automation and machine learning technology.
- ▶ Secure, offline-compatible audits and inspections manager.
- ▶ Database containing over 300 million pieces of contact and part data.
- ▶ Online learning management system to administer regulatory education and training.

In addition to software, Assent enhances global data exchange by providing free tools and educational offerings to small businesses that may otherwise lack the skills or resources to maintain sustainable, transparent business operations. We provide companies with free access to:

- ▶ Industry news and trends.
- ▶ Information about new legislation on the horizon.
- ▶ Changes to existing requirements.
- ▶ Supply chain issues to be aware of.

Sharing this knowledge across the business landscape has a profound impact for our clients. It improves the quality of supplier engagement. It promotes accuracy in the data exchanged in their business relationships, from the lowest tiers up. And it provides them with foresight on future challenges.

We provide solutions to more than 500 customers and a network of over 500,000 clients and their suppliers, either directly through the platform, or through complementary data-sharing interfaces such as the Supplier Portal. Due to the nature of our company and its services, we serve companies in every market and sector. However, most of our clients exist within one of seven core industries:

- ▶ Aerospace and defense
- ▶ Automotive
- ▶ Electronics
- ▶ Industrial equipment
- ▶ Medical devices
- ▶ Oil and gas
- ▶ Retail

Assent Compliance Inc. is a privately-held company with offices in five countries, headquartered in Ottawa, Canada. Our ownership group is formed by a combination of equity firms, founders and employees. The majority of Assent's ecosystem of business partners are based in top-trading countries such as the U.S., China, the United Kingdom and Germany.

We have the continued support of world-class investment firms, and have benefited from Series A, B and C financing rounds for a total of over \$190 million USD.

INVESTORS & PARTNERS

\$190 Million+ Funding Raised

GREENSPRING ASSOCIATES

Trusted Relationships. Better Outcomes.®

VOLITION **bdc***
C A P I T A L

OTEAF | OpenText
Enterprise Apps Fund

WARBURG PINCUS

Corporate Partners

ptc **LORAX**
Compliance

HANZA **intertek**

CSA
Group

Our employees also act as shareholders. Our Employee Stock Option Plan engages our employees to think and act like business owners, and become personally invested in the growth and success of the company. For this reason, each of our employees receives a set of stock options after their probationary period has elapsed.

In 2019, Assent expanded its operations into the European Union (EU) and Asia, with new regional hubs in Amsterdam, Netherlands, and Penang, Malaysia. These expansions position us to meet the unique needs of clients and their supply chains in both regions with a dedicated on-the-ground presence.

The Amsterdam location will help Assent continue to build transparency between our clients and participate in important standards discussions happening in the EU region. Meanwhile, our offices in Malaysia give us a closer proximity to many of the supplier regions where we acquire data.



Assent is a proud advocate for sustainable business practices on the global business stage. We help companies streamline data exchange throughout their supply chains. While it is important that we meet existing regulatory requirements and customer expectations, we also take a precautionary approach to our CSR responsibilities, such as climate action, in alignment with the UNGC Ten Principles.

KEY THOUGHT LEADERSHIP



Data & Social Responsibility: How to Attract Investors With Your CSR Story

Learn how you can leverage supply chain data to tell a meaningful story that mitigates risk, engages consumers and attracts investment.

[VIEW WEBINAR](#)

EXTERNAL INITIATIVES & MEMBERSHIP OF ASSOCIATIONS

Through our association with external organizations, associations and initiatives, Assent plays a valuable private sector role in contributing to the environmental and human rights programs of our clients and their suppliers. In 2017, we have signed on to the UNGC as a participant in the Decent Work in Global Supply Chains action platform.

We also collaborated with other organizations on CSR-related data management initiatives in 2019 to enhance the quality and efficiency of supply chain due diligence throughout the global business landscape.



ETHICS & INTEGRITY

Assent's vision is to drive transparency between businesses for shared responsible stewardship. We help companies leverage technology and education to collect data, and we promote transparency between businesses by standardizing, automating and centralizing product and company data.

We earn and maintain the trust of our customers, shareholders and employees through our commitment to ethical business practices in all our initiatives. We empower our customers to do the same by improving transparency across their organization and supply chain.

We make nuanced commitments to our stakeholders that vary by group.

CLIENTS

To be our clients' partner in the pursuit of supply chain transparency, providing world-class service, supplier support and market-leading technology to help them meet their goals.

EMPLOYEES

To foster and maintain an inclusive culture that challenges and empowers our employees, allowing them to define their own paths to success while influencing positive change.

SHAREHOLDERS

To provide value by growing and developing Assent Compliance through strong leadership, responsible investments and strategic activities in alignment with the company's core vision and values.

COMMUNITY

To empower our global community by providing processes, solutions and ideas that help drive transparency and a better tomorrow.

We believe these values are central not only to maintaining our leading market position, but to being a company that can show leadership in the evolving business landscape, contributing to an inclusive, healthy economy.

GOVERNANCE

Our leadership team and board of directors uniquely combine world-leading skill sets and experience in supply chain data management, informed by technical and business development expertise, strategic insight and a shared entrepreneurial spirit.

This powerful combination gives us the foundation and drive we need to grow, adapt and build the best supply chain data management platform. We're passionate about what we do — and dedicated to ensuring our clients have the tools and insights they need to manage their supply chain risk.

BOARD OF DIRECTORS

Andrew Waitman

Chief Executive Officer

Assent Compliance

Matt Whitteker

Vice President, Growth

Assent Compliance

Jonathan Hughes

Director, Strategic Relationships

Assent Compliance

Sean Cantwell

Managing Partner

Volition Capital

Justin Sadrian

Managing Director

Warburg Pincus

Samuel Lipsick

Vice President

Warburg Pincus

Kyle York

Vice President, Product Strategy

Oracle

Stephen Marsh

Chairman & Founder

Smarsh

LEADERSHIP TEAM

Andrew Waitman

Chief Executive Officer

Russell Frederick

Chief Financial Officer

Dave Curley

Chief Revenue Officer

Matt Whitteker

Vice President, Growth

Patrick Ryan

Vice President, Sales

Jean-François Pouliotte

Vice President,
Customer Success

James Calder

Vice President,
Compliance &
Regulatory Programs

Marc Harrison

Vice President,
Corporate Development

Travis Miller

General Counsel

Keira Torkko

Vice President,
Employee Experience

Jonathan Hughes

Director, Strategic
Relationships

CSR STEERING COMMITTEE STRUCTURE

At Assent, we value an inclusive, ethical workplace with a positive footprint in our community. We believe the best way to maintain this is by involving our workforce directly. This helps them contribute to our sustainable culture and better understand the needs of our clients.

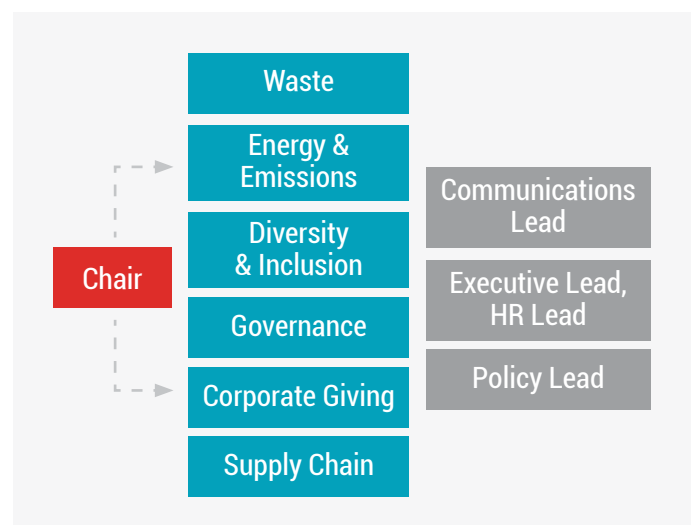
Our CSR Steering Committee leads employee working groups in fulfilling our commitment to the UNGC Ten Principles, and other issues of importance to stakeholders. In 2019, the Steering Committee evolved its structure to focus on all CSR topics material to the organization.

The CSR Steering Committee is chaired by a CSR subject matter expert with broad experience in global best practices. Although implementation is driven by the working groups, the committee has led activities to further embed sustainable principles within company culture. These include:

- ▶ A CSR station and promotional activities at company-wide meetings.
- ▶ Adding #csrchampion and #ecowarrior hashtags to our employee recognition platform, Bonusly.
- ▶ Monthly updates via company-wide emails.

- ▶ Providing support to the working group leads as they gained executive buy-in and budget for their initiatives.
- ▶ Liaising with Assent's marketing team to produce communications materials.

The initiative's working groups are composed of Assent employees passionate about driving change in specific areas, while further developing skills and knowledge beyond their daily duties. Working group leads are supported by executive leads on the Steering Committee, as well as a representative from Assent's Employee Experience (human resources) and Communications teams, to ensure broad coordination and support for their work.



STAKEHOLDER ENGAGEMENT

To succeed in our purpose of driving transparency between businesses for shared responsible stewardship, we engage and work in partnership with stakeholders to which we maintain a commitment. There are currently no collective bargaining agreements at Assent.

TABLE 1: STAKEHOLDER ENGAGEMENT STRATEGY

STAKEHOLDER	STRATEGY	FREQUENCY	KEY TOPICS & ASSENT RESPONSE
Clients	<ul style="list-style-type: none"> ▶ Product Executive Advisory Board ▶ Net Promoter Score surveys ▶ Newsletters, webinars, events, educational content ▶ Industry associations ▶ Direct communications 	Daily	<p>Assent operates with a client-first culture, and we receive feedback on the full range of topics related to our offerings, including:</p> <ul style="list-style-type: none"> ▶ Platform functionality. ▶ Product roadmap. ▶ Regulatory issues. ▶ Satisfaction with support. <p>Assent leverages this feedback to align our future offerings with client needs. This enables us to engage them proactively with forward-thinking solutions that both keep our companies at the top of our field.</p>
Employees	<ul style="list-style-type: none"> ▶ Net Promoter Score surveys ▶ Company-wide communications and meetings ▶ Anonymous feedback box ▶ Direct communications 	Daily	<p>Assent's Employee Experience team frequently engages employees for feedback on the efficiency and efficacy of various topics of concern, including:</p> <ul style="list-style-type: none"> ▶ Quality of training provided. ▶ How to improve workplace culture. ▶ Leadership performance. ▶ Diversity issues. ▶ Ergonomic issues. ▶ Company direction. ▶ Benefits packages. <p>This allows us to ensure the company is growing in alignment with employee needs and company interests.</p>

STAKEHOLDER	STRATEGY	FREQUENCY	KEY TOPICS & ASSENT RESPONSE
Shareholders	<ul style="list-style-type: none"> ▶ Investor meetings ▶ Investor reports ▶ Direct communications 	Monthly, Quarterly	<p>While we share monthly and quarterly results that include both financial performance and key metrics with investors, we also engage them on an as-needed basis to discuss broad financial decisions as they arise.</p> <p>Information is shared in a consistent manner so we can have comparative figures/information at all times.</p> <p>As a result, we are able to gain executive buy-in and feedback on all corporate initiatives with the potential to impact the value of the company.</p>
Communities	<ul style="list-style-type: none"> ▶ Multi-stakeholder initiative meetings ▶ Media reports, webinars, events, educational content 	Weekly	<p>Civil society raised issues to the business community on behalf of workers and communities. These include the continued prevalence of modern slavery in global supply chains, and the shift from conflict minerals, which generally includes the ethical sourcing of four minerals commonly sourced from the DRC, to responsible minerals, including cobalt. Assent responded by expanding its solutions and educational content to give businesses the tools they need to protect workers and communities in their supply chains from adverse human rights impacts.</p>
Supply Chains	<ul style="list-style-type: none"> ▶ Supplier onboarding ▶ Language support where available ▶ Co-hosted webinars and events with customers ▶ Newsletters, webinars, educational content ▶ Industry associations ▶ Direct communications ▶ Knowledge base of regulatory and product knowledge for self-serve education 	Daily	<p>Suppliers in Assent's network are a vital part of our business and a primary focus for the better part of our services organization. We communicate them through various channels to get more information on:</p> <ul style="list-style-type: none"> ▶ Regulatory understanding they need. ▶ Challenges related to data exchange. ▶ How to navigate our Supplier Portal. ▶ Where to access more resources and training. <p>We use this information to inform our content strategy and ongoing enhancements to our products. We engage key suppliers to pilot changes and new products to ensure we meet their business needs. This is important for ensuring our clients are receiving high-quality data from their supplier networks.</p>

REPORTING PRACTICE

Assent aligns CSR reporting with the calendar year. In 2018, we issued our first CSR report to our stakeholders. At that time, we aligned our reporting topics with the UNGC Ten Principles, while leveraging GRI key performance indicators (KPIs) to measure our performance.

This year, we applied a materiality lens that aligns with the GRI Core framework. The list of Assent's material topics has expanded accordingly. To define our material topics, we assessed stakeholder issues and determined which we had the opportunity and responsibility to impact. We also referred to GRI standards for sustainability context, stakeholder inclusiveness, completeness and report quality.

There are no restatements of information in the 2019 report. Although we do not have our report externally assured, as a member of the UNGC, we submit our report for review and public evaluation.

KEY THOUGHT LEADERSHIP



Addressing CSR: Importance of Reporting

Learn more about the challenges involved in reporting and how companies can use standards to streamline the process.

[VIEW WEBINAR](#)

MATERIAL TOPICS

ECONOMIC

- ▶ Economic performance
- ▶ Corporate giving
- ▶ Market presence
- ▶ Indirect economic impacts
- ▶ Anti-corruption
- ▶ Anti-competitive behaviour



ENVIRONMENT

- ▶ Energy
- ▶ Emissions
- ▶ Effluents and waste
- ▶ Environmental compliance
- ▶ Supplier environmental assessment



SOCIAL

- ▶ Employment
- ▶ Occupational health and safety
- ▶ Training and education
- ▶ Diversity and equal opportunity
- ▶ Non-discrimination
- ▶ Freedom of association and collective bargaining
- ▶ Child labor
- ▶ Forced or compulsory labor
- ▶ Human rights assessment
- ▶ Supplier social assessment
- ▶ Customer privacy
- ▶ Socioeconomic compliance



LOCATIONS

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Netherlands

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KENYA

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(MUPS Plaza), 21st floor,
Uganda-Nairobi Road
Eldoret, Kenya

ECONOMIC PERFORMANCE

Assent Compliance is one the fastest-growing technology companies in North America. Our economic performance has been impressive, and it has led to more insight into our internal operations, given the interconnectivity between economic performance, sustainability and business continuity.

Assent's growth has been extraordinary for many years. This is directly tied to the success and value Assent has brought to our customers and investors. We review and track our economic performance in collaboration with our world-class board of investors and executive team, and participate in ongoing financial benchmark evaluations.

Our performance and growth have been celebrated with several high-profile awards. In 2019, Assent was awarded:



**BEST OTTAWA
BUSINESS AWARD FOR
BEST BUSINESS**

50 | **Technology Fast 50
2019 CANADA WINNER
Deloitte.**

500[™] | **Technology Fast 500
2019 NORTH AMERICA
Deloitte.**

**RANKING ON TWO DELOITTE
FASTEST-GROWING TECHNOLOGY
COMPANY LISTS**



**A HIGHER SPOT ON THE
NARWHAL LIST (EIGHTH)**

A ranking of Canadian companies projected to reach a billion-dollar valuation, based on financial velocity.

Our company is proud of these acknowledgements, and they are supported by the acquisition of several high-impact clients throughout the year. Although Assent's financial performance is a positive performance indicator, as a private company, we do not disclose financial information.

CORPORATE GIVING IN 2019

While Assent is proud to share a portion of our revenue to support the Ottawa community, we also empower employees to support issues of personal importance with their own time. Assent also contributes to the efforts of community organizations that align with our own values. In 2019, corporate giving and charity volunteer work included:

- ▶ Partnering with Ecology Ottawa to do a tree giveaway and perform cycling audits.
- ▶ Working with the City of Ottawa to do two park cleanups during the spring.
- ▶ Partnering with Ottawa Community Housing to beautify low-income housing areas.
- ▶ Collecting 235 pounds of food for the Ottawa Food Bank.
- ▶ Helping IMPACT (formerly Partnership Africa Canada) refine processes for responsible minerals management in high-risk sourcing environments.
- ▶ Visits and donations to children's homes in Eldoret with Glasses of Hope.
- ▶ Fight for the Cure: \$25,825 total in employee and company fundraising.
- ▶ Hope Beach Volleyball Tournament: \$2,640 raised for various local charities.
- ▶ Joining a walk to raise funds for St. Luke's Orthopaedic and Trauma Hospital Bone and Joint Foundation in Eldoret.
- ▶ Employee-made charitable donations through the Bonusly platform.
- ▶ Hosting a Hire Immigrants Ottawa (HIO) coaching event to support new Canadians in their search for employment in the IT sector.
- ▶ Children's Wish Foundation: \$20,370 combined employee and company fundraising.

TRANSPARENT CULTURE & GIVING

Assent Compliance has a valued position in the community as an employer, and contributes to many volunteer and charity initiatives. As the centerpiece of our activities, every year Jonathan Hughes, a member of Assent's Leadership team and board of directors, leads our company to make a dream come true in association with the Children's Wish Foundation.

From participating in team challenges to various fundraising efforts throughout the office, our company made two wishes come true in 2019. In total, Team Assent raised \$20,370.

MARKET PRESENCE

Assent's upward trajectory has been steep for many years, and we're expanding globally to support both customers and their respective suppliers. Our ability to engage with third parties from all over the globe, speak their languages and understand cultural dynamics is critical for our success and that of our clients.

Assent actively tracks and evaluates the needs of our clients and the locations where the majority of their respective suppliers are present. These metrics are used to make business expansion decisions, dictate document translation and support our evaluation of language needs.

Through our management evaluation process, Assent expanded operations globally by opening offices in Amsterdam, Netherlands and Penang, Malaysia. All (100 percent) members of senior management were hired from the local communities in which their offices are located, with our central executive team hired within Ottawa.

INDIRECT ECONOMIC IMPACTS

Delivering economic value to our clients lies at the core of what we do. Our platform technology and managed services enable companies to redirect core resources toward product design, and have a proactive relationship with the regulatory landscape. The cost-efficiency results of this are quantifiable, but the long-term benefits are more profound.

This year, we began to track the quantifiable indirect social and environmental impacts of our platform technology and managed services. Communicating

this insight to our prospects and clients has proven effective. Assent monitors the effectiveness of these efforts through competitor analysis and the cost of doing business.

We actively evaluate and provide insight into supply chain impacts through our return on investment calculator, which takes supplier insights into account to calculate the total costs our clients save through our services.

Assent's solutions also generate positive outcomes for people and the planet by building a more transparent relationship between clients and suppliers. Many of these clients are enterprise and mid-market companies with complex regulatory landscapes and broad supplier networks. Many vendors situated further down the chain may lack the resources or understanding to participate in their client's' due diligence programs.

Assent empowers the full buy-in and participation of client supply chains by providing a range of free-to-use resources, such as eBooks, guides and an online learning management system, in addition to our best-in-class Supplier Portal with 24/7 support. This influences smaller businesses — not just Assent's clients — to modernize data management and think sustainably about product design.

We also provide access to data exchange templates to help suppliers streamline due diligence in their own supply chains and roll the data up to enterprise clients. This promotes value chain dynamics and economic growth right down to the factory and materials sourcing levels of the supply chain, and reduces both financial risk and cost of due diligence for our clients.



SUPPLY CHAIN INSIGHT

TRANSPARENCY & SUSTAINABILITY

In 2019, Assent held its first annual Supply Chain Insight conference, bringing together the industry's top thought leaders and supply chain professionals in Phoenix, Arizona. Together, they built a sense of professional community around sustainability issues in global supply chains, with human rights expert Mira Sorvino giving a rousing keynote.

In addition to workshops and discussions on sustainability, the EU Circular Economy, and human trafficking and slavery, Assent ensured the conference had a minimal environment footprint by:

- ▶ Using glass sugar and water dispensers to cut down on waste.
- ▶ Designing reusable signage.
- ▶ Choosing a venue that prioritizes sustainability.
- ▶ Using recyclable materials wherever possible.
- ▶ Favoring ethically-sourced swag.
- ▶ Avoiding single-use plastics such as straws.

With over 140 attendees, Supply Chain Insight was well-attended and successful. The next event is already being planned for a new city in 2021.



ANTI-CORRUPTION

As Assent grows, we're acquiring strategic clients, opening offices in new regions and nurturing relationships in foreign markets. This introduces new risks to our company and brand, and our actions are being scrutinized and looked to as an example by the very connections we make. To maintain transparency in our business relationships throughout this high-growth phase, we have implemented a range of controls and activities, including:

- ▶ Providing employees with anonymous access to an online grievance and feedback channel, which is reviewed by key internal stakeholders.
- ▶ Coursework on ethical decision-making.
- ▶ Building code of conduct guidelines, with subsections on:
 - ▷ Upholding the law.
 - ▷ Fair competition.
 - ▷ Conflicts of interest.
 - ▷ Gifts.
 - ▷ Gratuities.
 - ▷ Business courtesies.
- ▶ Signing anti-bribery, anti-corruption clauses in high-risk business contracts.

Although our employees are trained on navigating high-risk business arrangements, given the nature of our services, we recognize the need for both oversight and ongoing, thorough engagement to mitigate corruption risk. We verify our efforts through business tool reports, internal and external audits, and multi-stakeholder review of all policies and frameworks.

Assent provides anti-bribery, anti-corruption training to employees during onboarding, with additional coursework provided through Northpass.

KEY THOUGHT LEADERSHIP



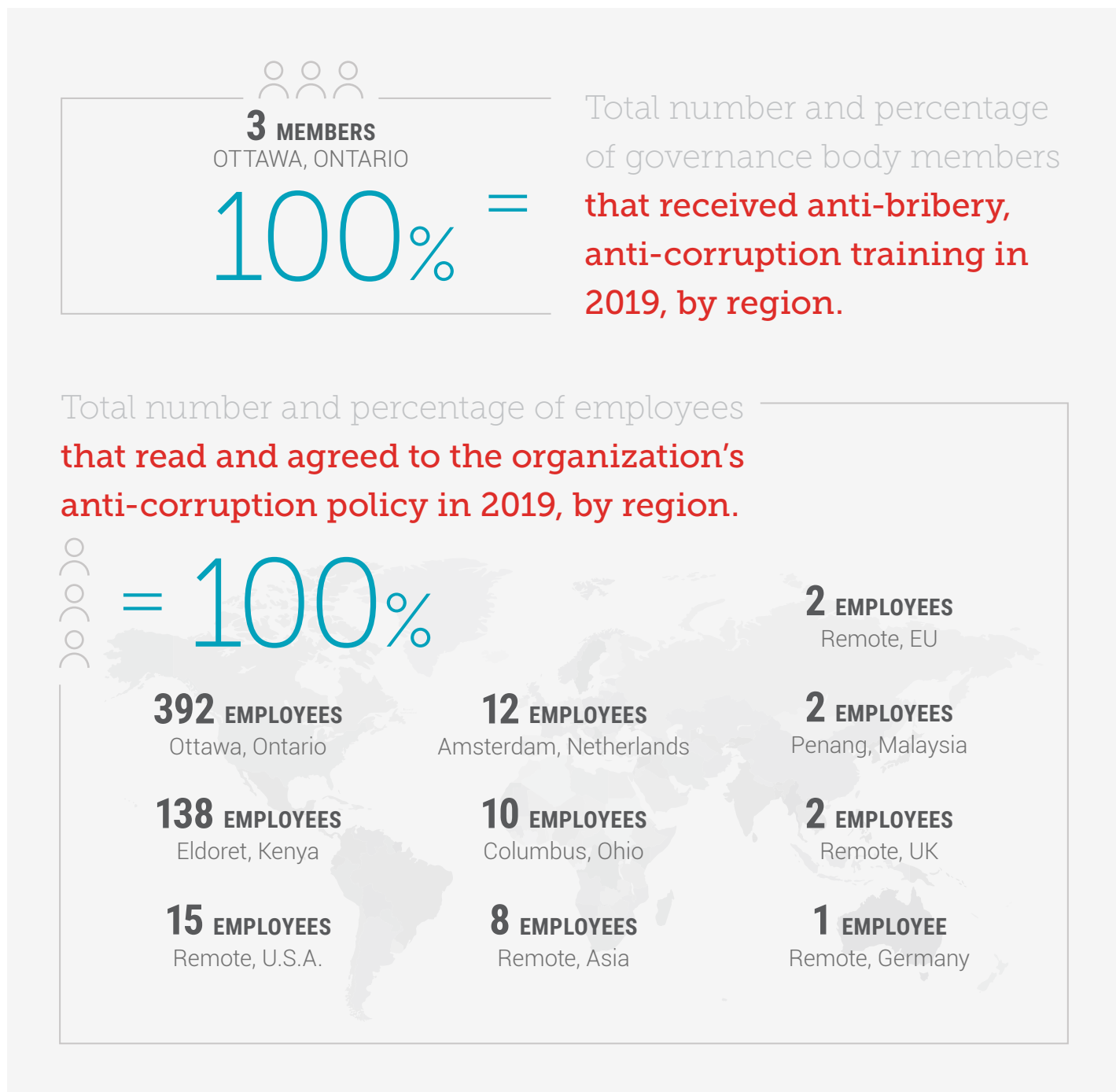
Combating Bribery & Corruption in the Supply Chain

Download our whitepaper to learn how companies are implementing anti-bribery, anti-corruption practices to minimize the risk of Foreign Corrupt Policies Act (FCPA) violations.

[DOWNLOAD WHITEPAPER](#)



TABLE 2: ANTI-BRIBERY, ANTI-CORRUPTION TRAINING



As a private company whose clients have significant confidentiality requirements, Assent does not disclose client information to the public. However, we do review the business policies of our clients to ensure they do not present a risk to our own company. Often, these policies are reflected within our contractual agreements, and we work proactively to ensure they are upheld. For more information about the verticals in which these relationships take place, refer to Page 3.

TRANSPARENCY TOOLS & ETHICAL DECISION MAKING

As a high-growth company, our business leaders and employees often find themselves in stressful sales and procurement situations with the potential to have profound impacts on our company. Assent's Governance Working Group resolved to find a system to influence ethical decision making.

Working in collaboration with the Royal Canadian Mounted Police, our team translated the CAPRA system — a problem-solving model used to maintain transparency and strong decision-making in community policing scenarios. The results of their work, an educational course, was uploaded to the Northpass LMS and shared with Assent employees.

Assent currently has no confirmed incidents of corruption or bribery within our company or in the context of our business relationships. We also take anti-bribery, anti-corruption practices into consideration when we evaluate our own suppliers, both manually and through our supplier survey.

ANTI-COMPETITIVE BEHAVIOUR

Assent is dedicated to ethical, fair and vigorous competition. We maintain these principles through all stakeholder relationships, including those with prospects, clients and their suppliers.

Assent Compliance's products and services are sold on the basis of their value. We invest significantly in marketing and sales talent to communicate these benefits accurately, and contribute resources toward the growth of our product engineering and development teams to ensure our platform is the most effective, scalable solution on the market. We do not participate in unethical sales or marketing behaviour; they can only present risk to our growth.

As a facet of our external engagement strategy, we regularly participate in industry associations to develop streamlined data exchange standards. These organizations maintain strict internal policies that govern how standards are developed and ensure they address the concerns of all companies equally.

We do not offer or solicit improper payments or gratuities in either client or procurement relationships, or participate in unlawful customer boycotts.

Assent verifies compliance with these policies through similar methods outlined in the Anti-Corruption section of this report, including multi-stakeholder policy review, video monitoring, business tool reports, and internal and external audits. We have not been associated with any claim, prosecution or allegations related to anti-competitive behavior, antitrust, or monopoly practices.

ENVIRONMENTAL PERFORMANCE

ENERGY

As a company that does not manufacture physical goods, Assent's energy needs are not heavy. However, we view this as a material issue from a leadership standpoint given the environmental impact of energy on air, water and land. Assent has made a commitment as a UN Global Compact participant to provide transparency into our footprint.

In 2019, our CSR Steering Committee decided to take a more direct approach to energy consumption, dividing our Environment Working Group into two individual teams: Waste, and Energy & Emissions. However, many of our global offices are located in buildings where energy consumption is managed by the property owner, so Assent has little, if any, opportunity to have an impact on our footprint.

Furthermore, while there are both federal and provincial programs available to businesses to reduce their consumption, their benefits are extolled within a long-term strategy. With Assent headquarters preparing to move into a more expansive workspace in the next year, it did not make sense for us to make retrofit investments in our current lease agreement.

Despite these constraints, Assent continues to make efforts to reduce its overall consumption. This includes default energy-saving settings on company laptops, Energy Star-certified monitors at every workstation and ongoing communication with building management to reduce unnecessary lighting. Conservation efforts are reviewed by management within IT and Finance departments.

ENERGY-EFFICIENT DATA STORAGE

Over time, Assent's IT department has looked to external data centers as our storage requirements expand. Cloud servers **have been found to reduce energy consumption** up to 84 percent by optimizing the resource utilization in their systems. In 2017, we began the process of transitioning data storage to the cloud when we moved client data to a Rogers service provider, which satisfied various client data security requirements as well.

We continued this transition in 2019, moving client data to industry-leading Amazon Web Services (AWS) facilities, and transferring more of our in-house resources to Rogers. While AWS performs ongoing systems optimization, the company is also working toward 100 percent renewable energy sourced from privately-owned solar stations in Virginia, North Carolina, Ohio and Indiana. In 2018, AWS put its usage at over 50 percent renewable.

ENERGY CONSUMPTION			
	2018	2019	CHANGE
CONSUMPTION	890,067 kWh	875,659 kWh	-14,408 kWh
INTENSITY	2,890 kWh	2,267 kWh	-623 kWh

GAS CONSUMPTION			
	2018	2019	CHANGE
CONSUMPTION	48,371 m ³	37,845 m ³	-10,526 m ³
INTENSITY	157 m ³	98 m ³	-59 m ³

EMISSIONS

Since Assent is a service provider, and does not manufacture physical goods, we are not a heavy emitter. Nevertheless, we see a significant opportunity to provide leadership on environmental issues, both within our space and with employees. For this reason, we disclose our emissions to stakeholders on an annual basis, and work to improve our performance from various approaches.

A great deal of Assent's business emissions come as a result of air travel. In 2019, we covered 13,862 miles by air. To determine the emissions footprint, we leveraged a tool made available on the **Carbon Zero website**, taking transfers into account by calculating emissions on a flight-by-flight basis. Our results eclipsed the emissions generated by our head office operations many times over.

As a means of reducing these Scope 2 emissions, as well as costs, we telecommute meetings whenever possible. Our IT team has installed video conferencing accounts in every meeting room to facilitate this. We also posted help articles on the company Intranet to build confidence in each employee's ability to connect with clients remotely without negatively impacting interactions.

EMISSIONS, IN KG Co2			
	2018	2019	CHANGE
ENERGY INDIRECT (SCOPE 2)	126,307 kg	89,630 kg	-36,677 kg
OTHER INDIRECT (SCOPE 3)	688,777 kg	788,983 kg	+100,206 kg
INTENSITY	2,646 kg	2,276 kg	-370 kg

We also rolled out a territory-based model for Assent's Sales team to create opportunities to hold multiple meetings within the same business trip, rather than flying to each individually. We expect this to further reduce our emissions from air travel.

Assent has significant opportunity to engage our workforce to reduce Assent's Scope 3 emissions footprint as it relates to employee commuting. As a result, many of the programs our Energy & Emissions Working Group has built engage our employees to reduce their commuting footprint. Some of these include:

- ▶ Partnering with **EnviroCentre** to promote green transportation.
- ▶ Representing commuter concerns at City of Ottawa bus station audits.
- ▶ Promoting access to a City of Ottawa ridesharing application.
- ▶ Organizing a highly successful Bike to Work month.
- ▶ Engaging employees with green energy thought leadership.
- ▶ Piloting a meatless employee-wide lunch.
- ▶ Rewarding employees who take sustainable transportation to offsite meetings.
- ▶ Including questions around electric vehicles in our annual transportation survey.

In the initial stages of these programs, some of them have fared well, while others had challenges. Employees participated with Bike to Work events, but our carpooling program failed to yield positive

results. Our transportation survey found that many of our employees are unwilling to change their mode of transportation, although some mentioned that a company subsidy would help.

In 2019, the City of Ottawa continued to manage well-documented public transportation challenges, including a reduced bus schedule as a result of the new light rail system that itself suffered many operational setbacks. We feel this contributed to unwillingness to use public transit.

However, there was promising interest in green transportation. Out of 242 respondents, 124 said they would consider purchasing an electric vehicle if there were charging stations at work. With Assent looking at new locations in the future, this has become a consideration.

EFFLUENTS & WASTE

As a fast-growing company, waste diversion infrastructure is essential to sustainability in our headquarters. While we continue to support our talent with free food, subsidized lunches, snacks and refreshments, we recognize the considerable waste management challenge this creates, given that this can lead to fewer employees packing lunches in reusable containers and introduces many single-use plastics to our ecosystem.

To mitigate waste impacts, we introduced and continued key sustainable waste activities in 2019. The most important of these is our composting program. This activity allowed our employees to positively influence company waste, even ensuring paper towels at hand

wash stations are disposed of sustainably. However, we do not have total weight numbers to report on for 2019.

The company's waste efforts also included:

- ▶ Adding compost to our existing waste management service contract.
- ▶ Purchasing additional waste diversion stations, with separate dividers for:
 - ▷ Paper and cardboard.
 - ▷ Metals and plastics.
 - ▷ Compost.
 - ▷ Landfill.
- ▶ Waste control audits to measure year-over-year performance.
- ▶ Providing personal reusable cutlery to all employees.
- ▶ Launching employee swap days to extend the lifespan of goods, including toys and books.
- ▶ Rolling out an online expense claim system to eliminate the need for paper receipts.
- ▶ Requiring employees to bring their own reusable glass to company mixers.
- ▶ Monitors at lunch to encourage correct waste disposal.
- ▶ Creating a video to facilitate learning on proper waste management.
- ▶ Printing collateral on FSC-certified paper.

We adjusted our procurement strategies to work in cohesion with these enhancements to our facilities, communicating with caterers to keep single-use plastics and styrofoams out of our garbage bins. This alleviated concerns raised as a result of 2018's waste audits, where we found that Assent was generating excessive landfill.

In 2019, we did another waste audit to gauge the efficiency of our new waste stations. While our results demonstrated year-over-year improvement, some waste was still being directed to the wrong areas. This shows the need for additional employee education and expectation-setting, and in 2020 we are planning for additional measures such as:

- ▶ Purchasing two additional waste stations.
- ▶ Switching from high-waste to compostable coffee pods.
- ▶ Delivering education on policies during onboarding.
- ▶ Creating and uploading coursework in Assent's LMS.
- ▶ Holding monthly reduction strategy events.
- ▶ Acquiring weight metrics for all forms of waste.

Assent will continue to perform annual waste audits to track our success metrics as we work to engage complex waste issues around plastics and paper waste.

REUSABLE CUTLERY: HOW SHARING OUR ACTIONS LED TO GREATER IMPACTS

Assent maintains transparent relationships with our clients, and we communicate with them frequently on social media. When we rolled out our reusable cutlery plan at Assent, cutting down on about 180 pounds of single-use plastic waste each year by providing each employee with their own set of branded silverware, our employees took to the internet to share the story.

The LinkedIn posts were a hit, and one of our clients – with over 4,000 employees – took notice and rolled out their own cutlery effort.

ENVIRONMENTAL & SOCIOECONOMIC COMPLIANCE

Although Assent is a supply chain data management company, our core software offering helps companies comply with regulations that, for example, manage hazardous substances that pose a threat to the environment and human health.

Assent must be prepared to meet the compliance requirements of our downstream clients, given that we are a part of their supplier network as a service provider. We also commit to providing leadership in this area to employees, our community and client network. For these reasons, we maintain compliance with environmental and socioeconomic requirements.*

As the leading supply chain data management company, Assent leverages a vast network of contacts to build the most comprehensive database of compliance data. We build and maintain the integrity of this asset through robust internal policies, integrated infrastructure, secure offsite data centers powered in part by renewable energy (see Page 20) and a compliance-focused learning management system.

KEY THOUGHT LEADERSHIP



Cobalt: Responsible Sourcing in Your Supply Chain

Learn more about why your company should be acquiring cobalt data, and how to build an effective program.

[DOWNLOAD EBOOK](#)

Assent has invested in a team of the most well-established, experienced and knowledgeable global compliance professionals in the world, working on topics such as:

- ▶ Hazardous substances
- ▶ Responsible minerals sourcing
- ▶ Human rights
- ▶ Sustainability
- ▶ Environmental compliance
- ▶ Anti-bribery, anti-corruption
- ▶ Labor rights
- ▶ Waste
- ▶ Medical device safety

Assent's experts monitor the CSR landscape to keep the world's largest corporations informed about global best practices, and disseminate free-to-access education throughout the entirety of the supplier landscape.

Our solutions drive value chain dynamics in work environments that may not otherwise have the resources to participate in data exchange, maintain ethical standards or leverage a technology solution to enhance profit potential.

Assent has not been subject to significant fines, non-monetary sanctions or litigation brought forward through dispute-resolution mechanisms associated with environmental or socioeconomic non-compliance.



COLLABORATING WITH THE ECHA ON TRANSPARENCY IN PRODUCT COMPOSITION

The EU Circular Economy Framework promotes sustainability by influencing product manufacturing with as much reusable content as possible, and laying out standards for the safe treatment of materials during the end-of-life phase. As part of the plan, the EU Waste Framework Directive requires companies to disclose hazardous substance content on all products sold into the region to a database accessible by waste workers for safe handling.

The new legislation created many challenges for our clients. To facilitate transparency between clients, suppliers and regulatory bodies, Raj Takhar, Assent's Subject Matter Expert on Materials Management & Chemical Reporting, joined the European Chemical Agency (ECHA) to represent industry concerns at the SCIP IT User Group, the team responsible for building the Substances of Concern in Products (SCIP) database solution.

As a result, industry has detailed guidelines on how to communicate with the database effectively, which Assent has shared with its clients in free-to-access learning materials.

SUPPLIER ENVIRONMENTAL & SOCIAL ASSESSMENT

Assent is committed to promoting strong CSR values throughout its operations and supply chain, as per the UN Guiding Principles on Business & Human Rights. We actively partner with suppliers that operate with respect for environmental and ethical standards, while maintaining excellence in customer service, quality and overall value.

At Assent, every department — as well as the kitchen — is stocked with the productivity essentials you would expect from a modern technology hub. We purchase from consumer goods retailers around the world, from IT equipment to food and drink. While our vendors have a responsibility to disclose their actions to us, nevertheless, we feel it is our responsibility to influence companies that produce consumer goods.

In 2019, we worked to analyze our spend to better understand our supply chain. We started by analyzing our vendor billing. In 2019, four categories represented over 70 percent of this spend: consultants, software, benefits and facilities. In 2020, we intend to take a closer look at spending through credit cards.

Embedding CSR principles is a journey, and we are happy to be a part of it. To help our supplier network align more closely with our CSR values, we run a Preferred Supplier Program. Preferred suppliers are those that demonstrate a commitment to transparency and continuous improvement, as well as meeting minimum criteria as set by Assent. We do not expect perfection, but we do want to see a plan.

LEVERAGING OUR OWN TOOLS

We use the Assent Compliance Platform to engage our vendors on their CSR practices. The program manager who manages these survey sendouts monitors supplier responses. The owner of the supplier relationship also sends follow-up requests to engage the suppliers.

The first year of Assent's program established a baseline for our suppliers' current CSR initiatives so that we can compare their progress over time. This information allows us to monitor our suppliers for continuous improvement. We surveyed 11 suppliers as a start, representing those with which we've held a long-term relationship.

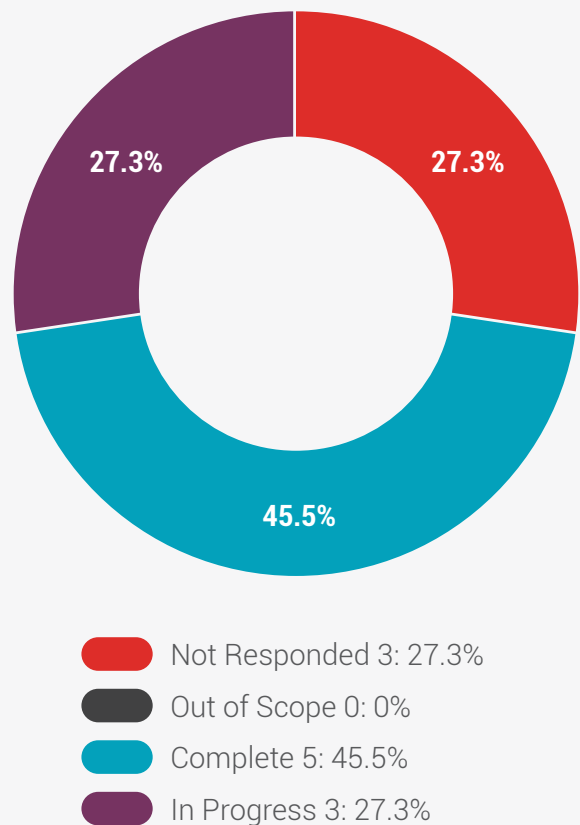
View Figure 2 for a breakdown of response rates of our supplier survey.

Assent piloted an early draft of the UNGC's Decent Work Toolkit for Sustainable Procurement with its buyers. This toolkit is designed to enable procurement staff to take action to improve labor conditions for supply chain workers. By piloting the toolkit, Assent's buyers increased their capacity to communicate the importance of decent work to suppliers. They also provided feedback to help the toolkit optimize its impact.

Assent's preferred supplier program is designed to increase CSR performance among vendors it regularly works with. For ad-hoc purchasing, our Supply Chain Working Group works directly with buyers to identify vendors who meet our criteria.

As the leader in supply chain data management, Assent is at the forefront of industry benchmarks and standards development as they relate to supply chain due diligence programs. This equips us to evaluate our own management system against industry norms.

FIGURE 2: SUPPLIERS BREAKDOWN



SOCIAL PERFORMANCE

EMPLOYMENT

Ottawa is a cultural and educational hub, vibrant with tech talent belonging to every ethnicity, religion and sexual orientation. As residents of Canada's capital in close proximity to federal legislators, our workforce is also politically and ethically conscious. It is this regional micro-cosm of qualities that has allowed us to keep the market advantage initially granted by the innovative principles, product design and business model our services were built upon.

Assent pursues this talent aggressively, both domestically and abroad. This is crucial to providing our customers with adaptive, urgent solutions. Many of these customers have made a commitment to reviewing the employment policies of their suppliers. As a service provider, we have a responsibility to ensure we do not present a risk to their company.

Furthermore, ethical operations are a requirement of our participation with the UN Global Compact, and we have made a commitment to promoting the UN Ten Principles and Sustainable Development Goals through our business operations.

As a foundation, our labor standards are in line with the Ontario Employment Standards Act, and any other region-specific laws in which our employees work from. However, Assent believes in going beyond the baseline provided by the domestic labor standards we navigate in order to win and keep talent. To this end, we believe nurturing and investing in the future of our employees inspires their best work, and enables them to live happy, fulfilling lives.

In addition to various perks, such as free food, refreshments, leisure areas, frequent catered lunches and quarterly offsite events, we offer competitive salaries and generous benefit packages administered by Canada Life Assurance Company in Ottawa, Aetna and Sun Life in the U.S., and Jubilee Insurance in Eldoret.

We also nurture culture by investing in the Bonusly application. Bonusly provides our highly collaborative departments with a means of providing tangible rewards and positive feedback to each other in order to shine light on each other's contributions and provide transparency into employee success.

Although we do not provide parental leave coverage beyond legal requirements, we meet all labor-related legislation, in every country in which we do business. Employment policies are shared during the onboarding process, and are reviewed by human resources management. This sets expectations, both for employees and their managers. We perform ongoing training workshops with any personnel managing employees to ensure they have the skills to maintain a fair, caring workplace.

BENEFITS OVERVIEW: OTTAWA HEADQUARTERS

In Ottawa's Assent headquarters, Assentees receive an attractive benefits package that includes:

- Healthcare.
- Hospital and nursing care in case of illness.
- Paramedical practitioners with a competitive range of deductibles.
- Prescription drugs.
- Vision care.
- Dental care.
- Employee assistance program for emotional support, legal guidance, financial resources, wellness tools and work-life balance guidance.
- Life insurance.
- Critical illness benefits.
- Long-term disability.
- Stock ownership.

WOMEN IN TECHNOLOGY & SALES: TRANSPARENCY IN EMPLOYEE ISSUES

Equality is good for everyone, and a business landscape that values the contributions of women as highly as it does its male leaders creates more revenue, contributes to happier lifestyles and builds better companies.

Currently, 46 percent of Assent management is female, compared to 25 percent through the rest of the Canadian private sector. To maintain transparency in women's issues, in 2019 Assent began supporting its female community through two groups: the Women in Technology Employee Resource Group, and the Power of Women group for female sales professionals. Together, they've engaged Assent's community with:

- Mentorship programs with female leaders within the company.
- Discussion on the personal and business benefits of an equal society.
- Coping mechanisms for overcoming imposter syndrome.
- Insight on how to navigate a male-dominated sales and technology fields.
- A positive culture of support among women.

Together, these initiatives have helped create an inclusive, open forum for female champions to support each other as they build their careers and approach the future with tenacity.

OCCUPATIONAL SAFETY & HEALTH

We believe that employee engagement is key to maintaining a safe workplace. At our headquarters, Assent has built an internal, employee-led committee to manage occupational safety and health, leveraging best practices and standards outlined by the province of Ontario.

Led by two Ontario-certified representatives (one for management, one for employees), our Joint Health & Safety Committee has a total of six members. Participation is voluntary, and its sole purpose is to resolve workplace safety-related disputes between employees and managers, and make health and safety recommendations to the human resources executive. The group's work in 2019 included:

- ▶ Sharing emergency maps with employees.
- ▶ Emergency response preparedness testing.
- ▶ Dissemination of learning materials.
- ▶ Building of a fire marshal program.

Assent has complemented the work of this committee with a range of offerings and initiatives that maintain the wellbeing of our workforce, including:

- ▶ A Health and Wellness Committee to promote mental and physical health resources available to our staff.
- ▶ Project Boost, which provided each staff member with a \$250 budget to customize their workspace with items such as:
 - ▶ Ergonomic chairs, keyboards and mice.
 - ▶ Standing desks.
 - ▶ Noise-cancelling headphones.
- ▶ Partnership with a GoodLife Fitness to provide discounted memberships.

This year, Assent had no reported injuries, occupational diseases, lost days, absences or fatalities as a result of work-related injuries. Still, in 2020 the team plans to continue mitigative efforts through the production of a health and safety training program for the company's learning management system (LMS) and by providing a free first aid certification course for employees.

TRAINING & EDUCATION

Compliance and technology share two core characteristics; they are both highly complex and are both expanding at breakneck speeds. Keeping pace is impossible without focused, ongoing skills development. To maintain our market position, Assent invests heavily to upgrade our people, and promote a growth mindset throughout our organization. We extend these principles generously to our clients and their own enterprise.

Although Assent is a supply chain data management service provider, we are also supply chain educators. As a result, we have a great deal of personnel with professional skills for developing educational coursework. We leverage these assets to build employee training plans into Assent Academy, our internal LMS, with custom learning paths on manager training, security and compliance, employee resources and onboarding.

We complement these resources throughout the year with a full roster of additional offerings that includes personal and professional mentorship from our executives and an on-site library of growth-based reading personally curated by Assent's CEO. Although we have not acquired average annual training per year metrics,

each employee receives a baseline of 30 mandatory hours of education and training, with various optional opportunities throughout the year. These include:

- ▶ 16 hours of professional development.
- ▶ Two hours career development check-ins.
- ▶ Ongoing one-on-one check-ins.
- ▶ 12 hours of optional learning sessions through our annual Drop Everything and Learn (D.E.A.L.) workshop.
- ▶ 24 hours of optional technology training through our bi-monthly Tech Talk.
- ▶ 12 hours minimum of optional corporate social responsibility skills development.
- ▶ Optional discretionary training through our Assent Academy LMS.
- ▶ Opportunity to make the business case for additional skills upgrade subsidies.

While we have various success metrics for each of these initiatives, we do not have average per-employee totals. We plan on building this transparency to gain better insights into how much training each employee is actually receiving, enabling us to better nurture their personal and professional growth in the future.

DIVERSITY, EQUAL OPPORTUNITY & NON-DISCRIMINATION

Ottawa is home to one of the most ethnically and gender-diverse talent pools in the world. Assent's workforce reflects this, and we work in collaboration with various stakeholder groups to nurture an inclusive, discrimination-free* environment where our differences are respected and celebrated. We also work with post secondary institutions to connect students with paid internships and employment opportunities, providing new graduates with a home to develop their skills and experience success.

Assent reports on gender diversity in its operations both as an ethical responsibility, and its requirements under the GRI and UNGC. Our diversity and equal opportunity practices are reviewed and championed by our executive in human resources and the company's Diversity & Inclusion Working Group, which through the majority of 2019 was led by a business and human rights expert. Initiatives included:

- ▶ Creation of employee resource groups to engage targeted demographics on a range of fronts, including:
 - ▷ Multicultural issues.
 - ▷ Women in technology.
 - ▷ Accessibility.
 - ▷ Mental health.
 - ▷ Pride (LGBTQ2I+).
 - ▷ Young professionals.
 - ▷ Employees with family considerations.
- ▶ Holding company-wide celebrations for diversity groups, including National Pride Month, Indigenous History Month and Black History Month.

- ▶ Creation of learning materials on diversity and inclusion.
- ▶ Training on non-discrimination and unconscious bias.

Assent is a diverse workplace with broad representation. The Employee Resource Groups have nurtured a sense of social community in our Ottawa headquarters, providing employees with common backgrounds the opportunity to share their experiences with each other. With oversight from the executive in human resources, this provides us transparency into how to maintain an inclusive culture, and introduce initiatives that promote a sense of belonging and help us retain talent.

Assent is a diverse workplace with broad representation. The Employee Resource Groups have nurtured a sense of social community in our Ottawa headquarters, providing employees with common backgrounds the opportunity to share their experiences with each other. With oversight from the executive in human resources, this provides us transparency into how to maintain an inclusive culture and introduce initiatives that promote a sense of belonging.

Although Assent is a multicultural workplace, we do not yet report on ethnic diversity. However, we can report that our company has no reported incidents of discrimination, and therefore, no remedial actions were necessary.



GENDER DIVERSITY: END OF YEAR, 2019



LOCATION	HEADCOUNT DEC. 31, 2019	NO LONGER WITH ASSENT	MALE	FEMALE	MALE UNDER AGE 30	MALE AGE 30-50	MALE AGE 50 OVER	FEMALE UNDER AGE 30	FEMALE AGE 30-50	FEMALE AGE 50 OVER
Total	558	124	82	41	38	37	5	25	13	2
Europe	11	0	0	0	0	0	0	0	0	0
Asia	8	0	0	0	0	0	0	0	0	0
US	25	1	1	0	0	1	0	0	0	0
Eldoret	128	9	1	8	1	0	0	4	2	0
Canada	386	114	80	33	37	37	4	20	11	2

GENDER & AGE DIVERSITY: TOTAL COMPANY, 2019



	NUMBER OF EMPLOYEES 2019	MALE	FEMALE	UNDER AGE 30	AGE 30-50	AGE 50 OVER
Number	513	304	201	238	235	30
Percent		59.26%	39.18%	46.39%	45.81%	5.85%

GENDER EQUALITY: SALARY REMUNERATION, 2019



LOCATION	RATIO, MALE:FEMALE
Europe	1.27:1
Asia	N/A
Canada	1.18:1
Eldoret	1.05:1

HUMAN RIGHTS

As global businesses gain more transparency into global work environments, they are finding many complex human rights issues to combat. As a supply chain data management service provider, Assent has a large stake in facilitating effective, meaningful due diligence. Although we are a private, for profit company, our services help companies enact great good.

Assent has both anticipated and supported the global business landscape as it expands toward mandatory annual human rights reporting.* We work with some of the world's most recognizable brands to solve complex due diligence challenges, and are a first-mover on several data types.

Because many of Assent's clients have made a financial and organizational commitment to evaluating the actions of their supply chain, we have a responsibility to do the same. Furthermore, UNGC participation sets a clear standard for ethical labor. While meeting regional guidelines, we also have internal policies and course work to promote a fair, ethical workplace.

KEY THOUGHT LEADERSHIP



Human Rights Benchmarking in the Apparel Sector

View our webinar for practical takeaways on enhancing your human rights and forced labor due diligence program.

[VIEW WEBINAR](#)

The rights of Assent's own employees are articulated and shared in our Business Code Guidelines, which encompass respect for the individual. We also make a Workplace Harassment & Violence Policy course available on Assent Academy. The course educates employees on all forms of workplace harassment, including violence, bullying, threats and unwanted sexual advances.

We also post guidelines on appropriate communication on company phones, instant messaging applications, email and non-essential communications. This mitigates incidents of harassment and verbal abuse.

Assent performed a risk analysis of its operations in 2019 on a range of material issues, including freedom of association and collective bargaining, child labor and forced labor. Although we did not find any high-risk operations, we see materiality in reporting our results.

FREEDOM OF ASSOCIATION & COLLECTIVE BARGAINING: MEDIUM RISK

Assent has offices in operations in several countries, but none of them are located in a country that prohibits freedom of association or collective bargaining. In most cases, the ability to unionize is a well-established and fundamental human right.

While Assent employees are under no immediate duress, we are in the process of developing a policy that protects their human and labor rights, including the right to freedom of association and collective bargaining. Currently, no restrictions are placed on the ability of our employees to organize themselves.

Because we have offices in the U.S. and Malaysia, there is a risk of these rights being violated. In these jurisdictions, there are well-documented instances of trade union leaders being harassed, intimidated and

the right to bargain collectively being denied. However, we are committed to maintaining oversight and transparency with these environments to ensure all regional labor laws are being respected.

CHILD LABOR: VERY LOW RISK

Before making any employment offer, Assent investigates each employee's age and background to determine they are not minors and are able to work as defined by national and international laws. These practices apply to any and all countries in which we operate.

Although child labor can happen in any country, our risk is very low. Assent does not have operations in at-risk industries, and our direct exposure to child labor risk is minimal. However, there is the possibility of indirect risk through our supply chain, including providers of goods and services.

FORCED OR COMPULSORY LABOR: VERY LOW RISK

Assent has robust assessment processes in place to ensure we are not intentionally or unintentionally involved in forced labor. We recruit all employees directly, and do not use recruiters, thereby eliminating the risk of recruitment fees and debt bondage.

All employees receive detailed agreements stating the conditions of employment in compliance with regional labor laws. This includes the employer's right to terminate their employment at any time upon giving reasonable notice.

Although forced labor can happen in any country, our risk is very low. Assent does not have operations in high-risk industries, and our direct exposure to forced labor is minimal. However, we are aware of the possibility of indirect risk through our supply chain, including providers of goods and services.

COLLABORATION WITH THE SOCIAL RESPONSIBILITY ALLIANCE

The Social Responsibility Alliance (SRA) facilitates human and labor rights data acquisition to help companies positively influence their supply chains and improve the lives of those impacted by human rights violations.

In 2019, Assent Compliance continued its role as a convening force for the Social Responsibility Alliance, providing companies with the open-source tools, resources and support they need to build ethical supply chains.

The initiative houses the Slavery & Trafficking Risk Template (STRT), an open-source tool maintained by a multi-stakeholder Development Committee. Travis Miller, General Counsel at Assent and co-author of The Lawyer's Corporate Social Responsibility Deskbook, holds one of the co-chair roles on the Development Committee.

CUSTOMER PRIVACY

Assent collects sensitive information from millions of global clients, suppliers and stakeholders on an annual basis. They trust us to keep their regulatory and business data private and secure. We reward their confidence with state-of-the-art security and privacy programs, and disclose our risk mitigation efforts to external stakeholders, as well as our board and shareholders.

Assent enters into formal data processing agreements (DPAs) with customers acquiring, transferring and storing personally identifiable information (PII). Assent applies necessary physical, technological and administrative measures to protect personal data and ensure compliance with client agreements and data stewardship laws. These include:

- ▶ Appointing a Data Protection Officer (DPO) to oversee our privacy program.
- ▶ Forming a cross-functional privacy team to review all organizational activities that involve PII and handle both internal and external privacy inquiries.
- ▶ Implementing a series of privacy policies and training.
- ▶ Requiring entry-exit registration of visitors.
- ▶ Securing dedicated areas for the protection of servers and devices.
- ▶ Using SSL certificates to protect system users against unauthorized access.
- ▶ Building risk management and threat identification plans.
- ▶ Gaining SOC 2 Type II certification, with a report available upon request.
- ▶ Building an office in Columbus that is compliant with the International Traffic in Arms Regulations.

In 2019, we implemented a robust privacy program, piloted our privacy email domain, and formalized our privacy training. We included security and privacy training in our annual policy, product, and cross-functional team reviews on all corporate activities that involve sensitive data. Policies were and will continue to be made easily-accessible to all staff. We had no substantiated complaints concerning breaches of customer privacy or losses of customer data.

To keep pace with the evolving data security landscape, we perform annual reviews of our privacy program and its management approach, supported by both internal and outside legal counsel. We discuss new and emerging privacy laws and regulations during the organization's bi-weekly privacy council meetings, and adjust our systems accordingly.

In 2020, we will begin tracking the performance of our program through industry-standard KPIs to support the identification of any gaps or other issues that may arise, as well as showcase our capabilities to invested stakeholders. These KPIs will be disclosed in our 2020 CSR report.



CONCLUSION

As the world leader in supply chain data management, Assent helps companies build and maintain superior product environmental and human rights programs, with broad impacts throughout their supplier landscapes.

While our products engage businesses to uphold and advance the UNGC Ten Principles and Sustainable Development Goals, we work hard to ensure our company operates under the same values. That means having a positive footprint in our environment, community and workforce.

Alignment with GRI Core criteria took our CSR report in expansive new directions, and allowed us to tell the full story of our success, both as an employer and as a business. We are on the same journey as our clients, and the culture of transparency that we build together contributes to our vision of a landscape where ethical decision-making leads to better business outcomes.

Assent is already helping our clients live in this reality, and build revenue through their supply chain due diligence programs. As lower-tier suppliers are introduced to the ecosystem, it will take the entire supply chain to bold, exciting places. And they will always be able to count on us for guidance and leadership along the way.

REPORTING INDEX

UN SUSTAINABLE DEVELOPMENT GOALS

SUSTAINABLE DEVELOPMENT GOAL	PAGE #
Goal 1: No Poverty	5, 13, 28
Goal 2: Zero Hunger	5, 13
Goal 3: Good Health and Well-being	5, 30
Goal 4: Quality Education	14, 16, 18, 25, 31
Goal 5: Gender Equality	5, 30, 32
Goal 6: Clean Water and Sanitation	5, 26
Goal 7: Affordable and Clean Energy	20, 22
Goal 8: Decent Work and Economic Growth	4, 5, 6, 8, 28, 32, 34, 35
Goal 9: Industry, Innovation and Infrastructure	2, 5, 26, 28

SUSTAINABLE DEVELOPMENT GOAL	PAGE #
Goal 10: Reduced Inequality	5, 30, 32
Goal 11: Sustainable Cities and Communities	5, 9, 22, 28
Goal 12: Responsible Consumption and Production	2, 14
Goal 13: Climate Action	5, 19, 20, 22
Goal 14: Life Below Water	5, 15, 24
Goal 15: Life on Land	5, 15, 23
Goal 16: Peace and Justice Strong Institutions	5, 16, 18
Goal 17: Partnerships to Achieve the Goal	3, 5, 8

UNITED NATIONS GLOBAL COMPACT TEN PRINCIPLES

PRINCIPLE	PAGE #
Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights; and	24, 26, 34, 35
Principle 2: Make sure that they are not complicit in human rights abuses.	24, 26, 34, 35
Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;	24, 26, 34, 35
Principle 4: The elimination of all forms of forced and compulsory labour;	24, 26, 34, 35
Principle 5: The effective abolition of child labour; and	24, 26, 34, 35

PRINCIPLE	PAGE #
Principle 6: The elimination of discrimination in respect of employment and occupation.	24
Principle 7: Businesses should support a precautionary approach to environmental challenges;	4, 26
Principle 8: Undertake initiatives to promote greater environmental responsibility; and	19, 21, 22, 23, 24, 26
Principle 9: Encourage the development and diffusion of environmentally friendly technologies.	15, 20, 22, 23, 24
Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.	16, 18, 24

GLOBAL REPORTING INITIATIVE CORE KPIS

GRI TOPIC	KPI	DESCRIPTION	PAGE #
Organizational Profile	102-1	Name of the organization	3
Organizational Profile	102-2	Activities, brands, products and services	3
Organizational Profile	102-3	Location of headquarters	11
Organizational Profile	102-4	Location of operations	11
Organizational Profile	102-5	Ownership and legal form (*we should be able to disclose this information*)	3
Organizational Profile	102-6	Markets served	3
Organizational Profile	102-7	Scale of the organization	33
Organizational Profile	102-8	Information on employees and other workers	33
Organizational Profile	102-9	Supply chain	26
Organizational Profile	102-10	Significant changes to the organization and its supply chain	4
Organizational Profile	102-11	Precautionary principle or approach	4
Organizational Profile	102-12	External initiatives	5
Organizational Profile	102-13	Membership of associations	5
Strategy	102-14	Statement from senior decision-maker	1
Ethics & Integrity	102-16	Values, principles, standards and norms of behaviour	6
Ethics & Integrity	102-17	Mechanisms for advice and concerns about ethics	16
Governance	102-18	Governance structure	6
Governance	102-22	Composition of the highest governance body and its committees	6
Governance	102-23	Chair of the highest governance body	6
Governance	102-26	Role of highest governance body in setting purpose, values and strategy	6
Governance	102-27	Collective knowledge of highest governance body	6
Stakeholder Engagement	102-40	List of stakeholder groups	8

GRI TOPIC	KPI	DESCRIPTION	PAGE #
Stakeholder Engagement	102-43	Approach to stakeholder engagement	8
Stakeholder Engagement	102-44	Key topics and concerns raised	8
Reporting Practice	102-45	Entities included in the consolidated financial statements	11
Reporting Practice	102-46	Defining report content and topic Boundaries	10
Reporting Practice	102-47	List of material topics	10
Reporting Practice	102-48	Restatements of information	10
Reporting Practice	102-49	Changes in reporting	10
Reporting Practice	102-50	Reporting period	10
Reporting Practice	102-51	Date of most recent report	10
Reporting Practice	102-52	Reporting cycle	10
Reporting Practice	102-53	Contact point for questions regarding the report	44
Reporting Practice	102-54	Claims of reporting in accordance with the GRI standards	1, 10
Reporting Practice	102-55	GRI content index	38
Reporting Practice	102-56	External assurance	10
Management Approach	103-1	Explanation of the material topic and its Boundary	12, 14, 16, 19, 21, 22, 23, 24, 26, 28, 30, 31, 32, 34, 36
Management Approach	103-2	The management approach and its components	12, 14, 16, 19, 21, 22, 23, 24, 26, 27, 28, 30, 31, 32, 34, 36

GRI TOPIC	KPI	DESCRIPTION	PAGE #
Management Approach	103-3	Evaluation of the management approach	12, 14, 16, 19, 21, 22, 23, 25, 26, 27, 28, 29, 30, 31, 32, 34
Economic Performance	201-1	Direct economic value generated and distributed	12
Market Presence	202-2	Proportion of senior management hired from the local community	13
Indirect Economic Impacts	203-2	Significant indirect economic impacts	14
Anti-corruption	205-1	Operations assessed for risks related to corruption	17
Anti-corruption	205-2	Communication and training about anti-corruption policies and procedures	17
Anti-corruption	205-3	Confirmed incidents of corruption and actions taken	18
Anti-competitive behaviour	206-1	Legal actions for anti-competitive behavior, anti-trust, and monopoly practices	18
Energy	302-1	Energy consumption within the organization	20
Energy	302-2	Energy consumption outside the organization	20
Energy	302-3	Energy intensity	20
Energy	302-4	Reduction of energy consumption	20
Energy	302-5	Reductions in energy requirements of products and services	20
Emissions	305-1	Direct (Scope 1) GHG emissions	21
Emissions	305-2	Energy indirect (Scope 2) GHG emissions	21
Emissions	305-3	Other indirect (Scope 3) GHG emissions	21
Emissions	305-4	GHG emissions intensity	21
Emissions	305-5	Reduction of GHG emissions	21

GRI TOPIC	KPI	DESCRIPTION	PAGE #
Effluents and waste	306-2	Waste by type and disposal method	23
Environmental compliance	307-1	Non compliance with environmental laws and regulations	25
Supplier environmental assessment	308-1	New suppliers that were screened using environmental criteria	27
Supplier environmental assessment	308-2	Negative environmental impacts in the supply chain and actions taken	27
Employment	401-1	New employee hires and employee turnover	33
Employment	401-2	Benefits provided to full-time employees that are not provided to temporary or part-time employees	29
Employment	401-3	Parental leave	29
Occupational safety and health	403-1	Workers representation in formal joint management-worker health and safety committees	30
Occupational safety and health	403-2	Types of injury and rates of injury, occupational diseases, lost days and absenteeism, and number of work-related fatalities	31
Training and education	404-1	Average hours of training per year per employee	31
Training and education	404-2	Programs for upgrading employee skills and transition assistance programs	31
Training and education	404-3	Percentage of employees receiving regular performance and career development reviews	31
Diversity & Equal Opportunity	405-1	Diversity of governance bodies and employees	6, 33
Diversity & Equal Opportunity	405-2	Ratio of basic salary and remuneration of women to men	33
Non-discrimination	406-1	Incidents of discrimination and corrective actions taken	32
Freedom of association and collective bargaining	407-1	Operations and suppliers in which the right to freedom of association and collective bargaining may be at risk	34
Child labor	408-1	Operations and suppliers at significant risk for incidents of child labor	35
Forced or compulsory labor	409-1	Operations and suppliers at significant risk for incidents of forced or compulsory labor	35

GRI TOPIC	KPI	DESCRIPTION	PAGE #
Human rights assessment	412-1	Operations that have been subject to human rights reviews or impact assessments	34
Human rights assessment	412-2	Employee training on human rights policies or procedures	34
Supplier social assessment	414-1	New suppliers that were screened using social criteria	27
Supplier social assessment	414-2	Negative social impacts in the supply chain and actions taken	27
Customer privacy	418-1	Substantiated complaints concerning breaches of customer privacy and losses of customer data	36
Socioeconomic compliance	419-1	Non-compliance with laws and regulations in the social and economic area	25



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HR-OT-200331