



Spectris plc

Supplementary Sustainability Disclosures 2021

Incorporating:
Global Reporting Initiative;
and Sustainability Accounting
Standards Board

March 2022



GRI content index

Statement of use

Spectris has reported the information cited in this GRI content index for the financial year to 31 December 2021 with reference to the GRI Standards.

GRI 1 used

GRI 1: Foundation 2021

GRI content index continued

GRI Standard	Disclosure	Location	Comments
1. The organization and its reporting practices			
GRI 2: General Disclosures 2021	Disclosure 2-1 Organizational details	<p>Legal name: Spectris Plc</p> <hr/> <p>Nature of ownership and legal form: Public listed company. Related Undertakings and Subsidiaries: AR 2021 p.199-201</p> <hr/> <p>Location of headquarters: Melbourne House London WC2B 4LL United Kingdom</p> <hr/> <p>Countries of operation: Geographical Segments: AR 2021 p.142-143</p>	
	Disclosure 2-2 Entities included in the organization's sustainability reporting	<p>List of all entities included in sustainability reporting: Related Undertakings and Subsidiaries: AR 2021 p.199-201</p> <hr/> <p>Differences between the list of entities included in its financial reporting and the list included in its sustainability reporting: None</p> <hr/> <p>Approach used for consolidating the information, in case the organization consists of multiple entities: AR 2021 Note to the accounts, basis of consolidation p.129</p>	

GRI content index continued

GRI Standard	Disclosure	Location	Comments
GRI 2: General Disclosures 2021 continued	Disclosure 2-3 Reporting period, frequency and contact point	<p>Reporting period for, and the frequency of, sustainability reporting: 1 January – 31 December 2021. Frequency of reporting is annually.</p> <hr/> <p>Reporting period for financial reporting: 1 January – 31 December 2021</p> <hr/> <p>Publication date of the report or reported information: 28 March 2022</p> <hr/> <p>Contact point for questions about the report or reported information: sustainability@spectris.com AR 2021 p. 54 A Sustainable Business</p>	
	Disclosure 2-4 Restatements of information	<p>Restatements of information made from previous reporting periods, including explanation of reasons and effect: During 2021, the Spectris Group completed the divestment of the following businesses: Millbrook, Brüel & Kjær Vibro, ESG Solutions and NDC Technologies and data has been adjusted appropriately</p>	
	Disclosure 2-5 External assurance 2-5b Details on external assurance of the organization's sustainability reporting	<p>Policy and practice for seeking external assurance, including whether and how the highest governance body and senior executives are involved: Audit and Risk Committee, AR 2021 p.83-89</p> <hr/> <p>Details on external assurance of the organization's sustainability reporting: Webpage Environment Assurance Statement</p>	

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GRI Standard	Disclosure	Location	Comments
2. Activities and workers			
GRI 2: General Disclosures 2021 continued	Disclosure 2-6 Activities, value chain and other business relationships	Report the sector(s) in which the organization is active: Spectris in Focus AR 2021 p.2	
		Description of the value chain: Spectris in Focus AR 2021 p.2, webpage Supply Chain Management	
		Other relevant business relationships: n/a	
		Significant changes in the above compared to the previous reporting period: There have been no significant changes compared to the previous reporting period.	
	Disclosure 2-7 Employees	Total number of employees: Our organisational structure AR 2021 p.3	
		Total number of: (i). permanent employees, and a breakdown by gender and by region; (iv). full-time employees, and a breakdown by gender and by region: Our people AR 2021 p.59	
		Significant fluctuations in the number of employees during the reporting period and between reporting periods: Fluctuations in employee numbers are largely due to the divestment of Millbrook, Brüel & Kjær Vibro, ESG Solutions and NDC Technologies during 2021.	

GRI content index continued

GRI Standard	Disclosure	Location	Comments
3. Governance			
GRI 2: General Disclosures 2021 continued	Disclosure 2-9 Governance structure and composition	Governance structure, including committees of the highest governance body: Webpage ' Our Board '; ' Board and Committees '; Board and Executive Committee structure, AR 2021 p.70-71	
		Committees of the highest governance body that are responsible for decision-making on and overseeing the management of the organization's impacts on the economy, environment, and people: AR 2021 Board and Executive Committee Structure p.70	
		Composition of the highest governance body and its committees: Webpage ' Corporate Governance ' - Subsection: Board & Committees	
Disclosure 2-10 Nomination and selection of the highest governance body	Disclosure 2-10 Nomination and selection of the highest governance body	Nomination and selection processes for the highest governance body and its committees: Nomination Committee Report AR 2021 p.81-82, webpage Corporate Governance subsection: Nomination Committee Terms of Reference	
		Criteria used for nominating and selecting highest governance body members: Nomination Committee Report, AR 2021 p.81-82	
Disclosure 2-11 Chair of the highest governance body	Disclosure 2-11 Chair of the highest governance body	Reporting whether the chair of the highest governance body is also a senior executive in the organization: Webpage Corporate Governance - Subsection: Roles of Chairman and Chief Executive	

GRI content index continued

GRI Standard	Disclosure	Location	Comments
GRI 2: General Disclosures 2021 continued	Disclosure 2-12 Role of the highest governance body in overseeing the management of impacts	Role of the highest governance body and of senior executives in developing, approving, and updating the organization's purpose, value or mission statements, strategies, policies, and goals related to sustainable development: Corporate Governance Report – AR 2021 p.72	
		Role of the highest governance body in overseeing the organization's due diligence and other processes to identify and manage the organization's impacts on the economy, environment, and people: Corporate Governance Report – 2021 AR p.72	
		Role of the highest governance body in reviewing the effectiveness of the organization's processes as described in 2-12-b, and report the frequency of this review: All key processes are reviewed at least annually by the Board and more often if required.	
Disclosure 2-13 Delegation of responsibility for managing impacts	Disclosure 2-13 Delegation of responsibility for managing impacts	How the highest governance body delegates responsibility for managing the organization's impacts on the economy, environment, and people: Sustainability Report (TCFD) 2021 AR – p.65	
		Process and frequency for senior executives or other employees to report back to the highest governance body on the management of the organization's impacts on the economy, environment, and people: Sustainability Report (TCFD) 2021 AR – p.65	
Disclosure 2-14 Role of the highest governance body in sustainability reporting	Disclosure 2-14 Role of the highest governance body in sustainability reporting	Description of whether the highest governance body is responsible for reviewing and approving the reported information, including the organization's material topics, and if so, describe the process for reviewing and approving the information: AR 2021 Environmental Reporting p.66-67	

GRI content index continued

GRI Standard	Disclosure	Location	Comments
GRI 2: General Disclosures 2021 continued	Disclosure 2-15 Conflicts of interest	<p>Processes for the highest governance body to ensure that conflicts of interest are prevented and mitigated: Corporate Governance webpage – Articles of Association</p> <p>Whether conflicts of interest are disclosed to stakeholders: AR 2021 Directors Report p.111, Corporate Governance webpage – Articles of Association</p>	
	Disclosure 2-16 Communication of critical concerns	<p>Description of whether and how critical concerns are communicated to the highest governance body: Matters Reserved to the Spectris Board are reviewed at regularly scheduled Board meetings. Beyond these matters, ad hoc Board meetings are called as required to ensure the timely consideration of critical concerns.</p> <p>Total number and the nature of critical concerns that were communicated to the highest governance body during the reporting period: None.</p>	
	Disclosure 2-17 Collective knowledge of the highest governance body	<p>Measures taken to advance the collective knowledge, skills, and experience of the highest governance body on sustainable development: Corporate Governance Report, AR 2021 p.72 – measures in 2021 included a Board deep-dive on Net Zero and a teach in on future demands of the workforce.</p>	

GRI content index continued

GRI Standard	Disclosure	Location	Comments
GRI 2: General Disclosures 2021 continued	Disclosure 2-18 Evaluation of the performance of the highest governance body	Processes for evaluating the performance of the highest governance body in overseeing the management of the organization's impacts on the economy, environment, and people: Corporate Governance Report AR 2021 p.72	
		Description of whether the evaluations are independent or not, and the frequency of the evaluations: Corporate Governance Report AR 2021 p.72. External evaluations are conducted every three years.	
		Actions taken in response to the evaluations, including changes to the composition of the highest governance body and organizational practices: Corporate Governance Report, AR 2021 p.72	
Disclosure 2-19 Remuneration policies	Disclosure 2-19 Remuneration policies	Remuneration policies for members of the highest governance body and senior executives: Webpage Remuneration Policy and information AR 2021 Overview of Remuneration Policy p.92	
		Description of how the remuneration policies for members of the highest governance body and senior executives relate to their objectives and performance in relation to the management of the organization's impacts on the economy, environment, and people: Directors Remuneration Report, AR 2021 p.90-99	
Disclosure 2-20 Process to determine remuneration	Disclosure 2-20 Process to determine remuneration	Process for designing its remuneration policies and for determining remuneration: Corporate Governance webpage – Subsection: Remuneration Policy and information	
		Results of votes of stakeholders (including shareholders) on remuneration policies and proposals: Summary of Shareholder Voting AR 2021 p.107	

GRI content index continued

GRI Standard	Disclosure	Location	Comments
GRI 2: General Disclosures 2021 continued	Disclosure 2-21 Annual total compensation ratio	Ratio of the annual total compensation for the organization's highest-paid individual to the median annual total compensation for all employees (excluding the highest-paid individual): CEO pay ratios AR 2021 p.102	
		Ratio of the percentage increase in annual total compensation for the organization's highest-paid individual to the median percentage increase in annual total compensation for all employees (excluding the highest-paid individual): CEO pay ratios AR 2021 p.102	
		Contextual information necessary to understand the data and how the data has been compiled: CEO pay ratios AR 2021 p.102	
4. Strategy, policies and practices			
	Disclosure 2-22 Statement on sustainable development strategy	Statement from the highest governance body or most senior executive of the organization about the relevance of sustainable development to the organization and its strategy for contributing to sustainable development: Chairman's Statement AR 2021 p. 4-5	

GRI content index continued

GRI Standard	Disclosure	Location	Comments
GRI 2: General Disclosures 2021 continued	Disclosure 2-23 Policy commitments	Policy commitments for responsible business conduct: Webpage Code of Business Ethics	Also available in Chinese, Danish, Dutch, French, German, Italian, Japanese, Korean, Portuguese, Spanish and Swedish through the webpage ' Ethics and Culture '
		Specific policy commitment to respect human rights and links to the policy commitments: Webpage Human Rights Policy Webpage Modern Slavery and Human Trafficking Statement	
		The level at which each of the policy commitments was approved within the organization: Each Policy was approved by the Spectris plc Board – the most senior decision-making body within the Company.	
		Description of how the policy commitments are communicated to workers, business partners, and other relevant parties Webpage Ethical Business .	

GRI content index continued

GRI Standard	Disclosure	Location	Comments
GRI 2: General Disclosures 2021 continued	Disclosure 2-24 Embedding policy commitments	Description of how the organization embeds each of its policy commitments for responsible business conduct throughout its activities and business relationships: Webpage Ethical Business .	
	Disclosure 2-25 Processes to remediate negative impacts	Approach to identify and address grievances, including the grievance mechanisms that the organization has established or participates in: Webpage Ethical Business and AR 2021 p. 62	
		How the organization tracks the effectiveness of the grievance mechanisms and other remediation processes, and report examples of their effectiveness, including stakeholder feedback: Sustainability Report AR 2021 p. 62	
	Disclosure 2-26 Mechanisms for seeking advice and raising concerns	Mechanisms for individuals to: (i) seek advice on implementing the organization's policies and practices for responsible business conduct; and (ii) raise concerns about the organization's business conduct: Webpage Ethical Business .	

GRI content index continued

GRI Standard	Disclosure	Location	Comments
GRI 2: General Disclosures 2021 continued	Disclosure 2-27 Compliance with laws and regulations	<p>Total number of significant instances of non-compliance with laws and regulations during the reporting period: AR 2021 p.73 Corporate Governance Code Statement of Compliance</p> <hr/> <p>Total number and the monetary value of fines for instances of noncompliance with laws and regulations that were paid during the reporting period: None</p> <hr/> <p>Significant instances of non-compliance: AR 2021 p.73 Corporate Governance Code Statement of Compliance</p> <hr/> <p>Description of how the organization has determined significant instances of non-compliance: AR 2021 p.73 Corporate Governance Code Statement of Compliance 2018 UK Corporate Governance Code</p> <hr/> <p>Industry associations, other membership associations, and national or international advocacy organizations in which it participates in a significant role: Not applicable. Reference webpage How the Board Operates</p>	
5. Stakeholder engagement			
	Disclosure 2-29 Approach to stakeholder engagement	<p>Approach to engaging with stakeholders: AR 2021 p. 16 Our stakeholders + p. 76 Section 172(1) statement</p>	

GRI content index continued

GRI Standard	Disclosure	Location	Comments
GRI 3: Material Topics 2021	Disclosure 3-1 Process to determine material topics	Process followed to determine its material topics: Spectris Materiality Matrix AR 2021 p.55 Webpage Spectris Materiality Matrix	
	Disclosure 3-2 List of material topics	List of material topics: Spectris Materiality Matrix AR 2021 p.55 Webpage Spectris Materiality Matrix Report changes to the list of material topics compared to the previous reporting period: Not applicable. No changes compared to the previous reporting year.	

Material topics

GRI Standard	Disclosure	Location	Omission	Comments
I. Business Ethics and Governance				
GRI 3: Material Topics 2021	3-3 Management of material topics	Webpage Ethical Business		
GRI 205: Anti-Corruption 2016	205-1 Operations assessed for risks related to corruption	Risk assessments are covered by the Enterprise Risk Management process whereby we both look at the consolidated risks at a Spectris level an individual platform level.		
	205-2 Communication and training about anti-corruption policies and procedures	Code of Business Ethics p.24 Anti-Bribery and Corruption		
	205-3 Confirmed incidents of corruption and actions taken	None.		Not applicable. Spectris did not have any confirmed cases of corruption during the reporting year.
II. Data Privacy & Security				
GRI 3: Material Topics 2021	3-3 Management of material topics	Principal Risks, Cyber Threat AR 2021 p. 50		
GRI 418: Customer Privacy 2016	418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	None.		
III. Talent Attraction & Development				
GRI 3: Material Topics 2021	3-3 Management of material topics	AR 2021 p. 58-59 section Our people; AR 2021 p. 52, principal risk Talent and capabilities		

Material topics continued

GRI Standard	Disclosure	Location	Omission	Comments
GRI 401: Employment 2016	401-1 New employee hires and employee turnover	Employee Turnover AR 2021 p. 59		
GRI 404: Training and Education 2016	404-3 Percentage of employees receiving regular performance and career development reviews	100% of employees are eligible for performance reviews and this includes a development angle. The completion of performance reviews was about 85% in 2021. The approach to development conversations is more flexible, but all employees receive a development plan notification in their Workday inbox and are encouraged to have a conversation with their manager. However, some production employees won't have access to Workday, so it's again probably about 85% of all employees. So, combined performance & development reviews at 100% eligible and circa 85% complete on average.		
IV. Health & Safety				
GRI 3: Material Topics 2021	3-3 Management of material topics	Webpage Health and Safety		
GRI 403: Occupational Health and Safety 2018	403-9 Work-related injuries	AR 2021 p. 55 section 'Measuring our progress', Total Recordable Incident Rate 0.32		
V. Human Rights & Labour Practices				
GRI 3: Material Topics 2021	3-3 Management of material topics	Webpage Human Rights , AR 2021 p. 62 Our Approach, section 'Human Rights'		

Material topics continued

GRI Standard	Disclosure	Location	Omission	Comments
GRI 412: Human Rights Assessment 2016	412-3 Significant investment agreements and contracts that include human rights clauses or that underwent human rights screening	AR 2021, p. 62 section 'Human rights		
VI. Sustainable Markets				
GRI 3: Material Topics 2021	3-3 Management of material topics	Market Overview AR 2021 p.6-7		
VII. Sustainable Products & Solutions				
GRI 3: Material Topics 2021	3-3 Management of material topics	AR 2021 p. 63 Our Environmental Impact section 'Reaching Net Zero'; Roadmap to Net Zero		
GRI 302: Energy 2016	302-5 Reductions in energy requirements of products and services	AR 2021, p. 64 section 'Reaching Net Zero'		
VIII. Employee Diversity & Inclusion				
GRI 3: Material Topics 2021	3-3 Management of material topics	AR 2021 p. 59 section 'Diversity and Inclusion'		
GRI 405: Diversity and Equal Opportunity 2016	405-1 Diversity of governance bodies and employees	AR 2021 p. 59 section 'Diversity and Inclusion'		
	405-2 Ratio of basic salary and remuneration of women to men	AR 2021 p. 59 section 'Diversity and Inclusion'		

Material topics continued

GRI Standard	Disclosure	Location	Omission	Comments
XIX. Supply Chain Risk Management				
GRI 3: Material Topics 2021	3-3 Management of material topics	AR 2021 p. 52 'Our Approach'; p. 64 Reaching Net Zero, section 'Supply Chain Engagement at Malvern Panalytical'		
GRI 308: Supplier Environmental Assessment 2016	308-1 New suppliers that were screened using environmental criteria	AR 2021; p. 64 Reaching Net Zero, section 'Supply Chain Engagement at Malvern Panalytical'		
GRI 414: Supplier Social Assessment 2016	414-1 New suppliers that were screened using social criteria	AR 2021; p. 64 Reaching Net Zero, section 'Supply Chain Engagement at Malvern Panalytical'		
X. Local Community Impact & Engagement				
GRI 3: Material Topics 2021	3-3 Management of material topics	AR 2021 p. 60-61 'Our Communities'		
GRI 413: Local Communities 2016	413-1 Operations with local community engagement, impact assessments, and development programs	AR 2021 p. 60-61 'Our Communities'		
XI. Energy Efficiency				
GRI 3: Material Topics 2021	3-3 Management of material topics	AR 2021 p. 63-64 Our Environmental Impact section 'Reaching Net Zero'; Roadmap to Net Zero		
GRI 302: Energy 2016	302-1 Energy consumption within the organization	AR 2021 p. 66 Environmental Reporting, section 'Energy consumption'		

Material topics continued

GRI Standard	Disclosure	Location	Omission	Comments
XII. Responsible Material Selection				
GRI 3: Material Topics 2021	3-3 Management of material topics	AR 2021 p. 63-64 Our Environmental Impact section 'Reaching Net Zero'; Roadmap to Net Zero		
XIII. Greenhouse Gas Emissions				
GRI 3: Material Topics 2021	3-3 Management of material topics	AR 2021 p. 63-64 Our Environmental Impact section 'Reaching Net Zero'; Roadmap to Net Zero		
GRI 305: Emissions 2016	305-1 Direct (Scope 1) GHG emissions	AR 2021 p. 66 Environmental Reporting, section 'Greenhouse gas emissions (tonnes CO ₂ e)'		
	305-2 Energy indirect (Scope 2) GHG emissions	AR 2021 p. 66 Environmental Reporting, section 'Greenhouse gas emissions (tonnes CO ₂ e)'		
	305-3 Other indirect (Scope 3) GHG emissions	AR 2021 p. 66 Environmental Reporting, section 'Greenhouse gas emissions (tonnes CO ₂ e)'		
	305-4 GHG emissions intensity	AR 2021 p. 66 Environmental Reporting, section 'Greenhouse gas emissions (tonnes CO ₂ e)' – Total carbon emissions per £m of revenue		

Material topics continued

GRI Standard	Disclosure	Location	Omission	Comments
XIV. Waste Management				
GRI 3: Material Topics 2021	3-3 Management of material topics	AR 2021 p. 63-64 Our Environmental Impact section 'Reaching Net Zero'; Roadmap to Net Zero		
GRI 306: Waste 2020	306-3 Waste generated	AR 2021 p. 66 Environmental Reporting, section 'Waste data'		
	306-4 Waste diverted from disposal	AR 2021 p. 66 Environmental Reporting, section 'Waste data'		
XV. Responsible Water Consumption				
GRI 3: Material Topics 2021	3-3 Management of material topics			Responsible Water Consumption was included in Spectris' materiality matrix, but was found to be below the level of materiality demanding active management by the company. This topic is therefore omitted from reporting.

Sustainability Accounting Standards Board Disclosure

(For the Year Ended 31st December 2021)

SASB Standards guide the disclosure of material sustainability information by companies to their investors. Available for 77 industries, the Standards identify the subset of environmental, social, and governance (ESG) issues most relevant to financial performance in each industry.

SASB Standards are maintained by the Value Reporting Foundation, a global non-profit organisation that offers a comprehensive suite of resources designed to help businesses and investors develop a shared understanding of enterprise value – how it is created, preserved, or eroded. More details are available at <https://www.sasb.org/>.

Spectris plc is reporting against the SASB disclosure framework for the first time for 2021, noting its growing importance amongst our investor base. We believe the focus of the indicators is of importance to all our stakeholders and that there is a need for greater consistency in sustainability reporting standards globally to ensure useful and transparent disclosure for investors and other interested stakeholders. SASB seeks to address these needs.

The table that follows details our disclosures against the metrics that SASB deem relevant to our industry. SASB has placed Spectris plc in the Resource Transformation sector under the Electrical & Electronic Equipment industry. This report represents a best-efforts basis including the information and data available for 2021, with more planned in subsequent editions. Noting that SASB is a global framework with, at present, a US-focused approach to defining criteria, we have noted where we translate the spirit and meaning of the indicator to meet our UK reporting methods.

This document should be read in conjunction with our Sustainability Report, on pages 54 to 67 of our 2021 Annual Report, which includes a comprehensive set of Sustainability-related performance metrics.

Electrical & Electronic Equipment Standard disclosure (2020)

Within our designated industry sector, Electrical & Electronic Equipment, the metrics we have identified as material are:

Topic	Accounting Metric	Code	Data response and references				
Energy Measurement	(1) Total energy consumed	RT-EE-130a.1	Energy consumption				
	(2) percentage grid electricity		Unit of measurement – MWh	Change	2021	2020	2019
	(3) percentage renewable		Electricity	5.1%	48,629.6	46,282.9	51,010.1
			– of which renewable	279%	8,995.3	2,373.8	8.91
			Natural gas	8.2%	11,830.9	10,938.2	11,516.5
			Fuel oil	1.5%	43.4	42.8	30.7
			Steam and other imported energy	20.8%	16,666.3	13,801.7	15,526
			Other fuels	479.6%	373.0	64.4	31.8
			Vehicle energy	(2.6%)	17,686.7	18,162.7	36,719.6
			Total energy	6.7%	95,229.9	89,292.7	114,834.6
	– of which UK	4.5%	12,965.5	12,410.4	31,787.1		
			Further details are set out in the 2021 Annual Report and Accounts.				
Hazardous Waste Management	Amount of hazardous waste generated; percentage recycled	RT-EE-150a.1	No hazardous waste generated.				

Electrical & Electronic Equipment Standard disclosure (2020) continued

Topic	Accounting Metric	Code	Data response and references
Hazardous Waste Management	Number and aggregate quantity of reportable spills, quantity recovered	RT-EE-150a.2	No reportable spills.
Product Safety	Number of recalls issued, total units recalled	RT-EE-250a.1	No material recalls and none relating to injury or fatality.
Product Safety	Total amount of monetary losses as a result of legal proceedings associated with product safety	RT-EE-250a.2	No monetary losses as a result of legal proceedings associated with product safety.
Product Lifecycle Management	Percentage of products by revenue that contain IEC 62474 declarable substances	RT-EE-410a.1	A de-minimis number of products by revenue contain IEC 62474 declarable substances. The majority of declarable substances in the IEC 62474 are covered under European Directives RoSH and REACH. Quality Management Systems across the Group monitor compliance against RoSH or REACH standards with a de-minimis number of third-party products and spare parts relating to legacy products containing non-compliant components.
Product Lifecycle Management Materials Sourcing	Percentage of eligible products, by revenue, that meet ENERGY STAR® criteria	RT-EE-410a.2	Not applicable – Spectris does not gain revenue through the sale of any equipment in a product category for which ENERGY STAR certification exists.
	Revenue from renewable energy-related and energy efficiency-related products	RT-EE-410a.3	We are continuing to work towards being able to calculate this data.

Electrical & Electronic Equipment Standard disclosure (2020) continued

Topic	Accounting Metric	Code	Data response and references
Description of the management of risks associated with the use of critical materials	RT-EE-440a.1	<p>The process for the management of risks associated with critical materials varies across our businesses. In the majority of our businesses, critical materials are within some specialist components of our products and there is currently no technical latitude for alternative materials.</p> <p>Each business actively manages the procurement of critical materials and engages in mitigating activity through strong purchasing and sourcing efforts.</p> <p>Every business maintains a Quality Management System that reviews that oversees the sourcing of critical material. These systems, alongside active supplier codes of conduct that cover material sourcing, including conflict minerals declarations.</p>	

Electrical & Electronic Equipment Standard disclosure (2020) continued

Topic	Accounting Metric	Code	Data response and references
Business Ethics	Description of policies and practices for prevention of:	RT-EE-510a.1	Data type required - Discussion and analysis:
	<ul style="list-style-type: none"> (1) corruption and bribery and (2) anti-competitive behaviour 		<p>(1) Refer to Code of Business Ethics: Page 24 and 25; will there also be an annual report page reference?</p> <p>(2) Refer to Code of Business Ethics: Page 28 and 29</p> <p>Other:</p> <p>During 2021 the Company enhanced its ethics and compliance programme by rolling out and implementing revised compliance policies and procedures with supporting training and guidance to assist employees. The Company's ethics and compliance programme deals with the management of reputational and non-financial risk and the Company is committed to only engaging with customers and suppliers who share the Company's values.</p> <p>In the area of anti-bribery and corruption ("ABC"), the Company introduced a Global ABC Policy and updated and enhanced its supporting policies in the following areas: the engagement of third parties, facilitation payments, gifts, hospitality and entertainment, and conflicts of interest. The Company also implemented a global software management tool for the appointment, management, payment and termination of sales channel partners.</p> <p>During 2021 the Company revised and strengthened its Fair Competition programme by introducing a revised Fair Competition Policy together with supporting guidance on: (i) Cartels and other anti-competitive behaviour; (ii) Avoiding anti-competitive provisions in contracts; (iii) Abuse of a dominant position; (iv) Meetings and other interactions with competitors; and (v) Confidential and Sensitive Information in a M&A context.</p> <p>The Company also enhanced its Export Controls and Sanctions policies and procedures during 2021 with the rollout and implementation of a Global Export Controls Policy and 14 mandated procedures. The Group Executive Committee continued to operate its Exports Committee during the year and regular meetings took place to review and discuss key issues and developments in export controls and sanctions and agree Group export policies; this will continue throughout 2022.</p> <p>Risk based training for ABC and Fair Competition compliance was launched on 1st July 2021 and has been assigned to employees with a role profile that is considered high-risk; this will now form part of their annual training.</p> <p>ABC training has been assigned to 42% of the company with 89% having completed it to date. Fair Competition training has been assigned to 26% of the company with 86% having completed to date. Export Control training continued during 2021.</p>
Business Ethics	Total amount of monetary losses as a result of legal proceedings associated with bribery or corruption	RT-EE-510a.2	None
	Total amount of monetary losses as a result of legal proceedings associated with anticompetitive behaviour regulations	RT-EE-510a.3	None



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