

We're focused on doing the right thing for our colleagues, clients, communities and the future of our planet.

At Vistra, one of our key values is doing the right thing. It's a value we challenge ourselves to live up to every day. It's integral to how we run our business, how we look after our colleagues, and the services we develop and deliver for our clients. It's embedded in every team member's personal performance objectives.

Doing the right thing at Vistra.

As part of our overriding commitment to doing the right thing, Vistra pledges the following:

1. We will take proactive steps to reduce our environmental impact on the world by focusing on carbon reduction in our operating practices and in the way we work with our suppliers.
2. We will manage our business and our sustainability commitments responsibly. All Vistra offices will comply with all applicable laws and regulations to the highest possible standard, within that jurisdiction. Sustainability is integrated into our business decision making process, with responsibility residing with the Executive Committee (ExCo).
3. We will embrace diversity, equality and inclusion throughout our business – building an environment where everyone can be their best, whoever they are.
4. We will assist our clients and suppliers as far as possible, to meet their sustainability goals and help them to develop a framework in which they can meet their obligations and thrive in a sustainable economy.
5. To have a positive impact both environmentally and socially on our local communities around the globe, by empowering our local offices to make positive decisions to help others. We will also help a variety of Not for Profits embrace the highest levels of governance in their operations.



1. Reducing our carbon emissions

As global citizens, we must do what we can to protect our planet and use our resources responsibly. Our Vistra carbon reduction program is committed to lowering our carbon footprint by reducing our carbon dioxide (CO₂) emissions, as we pursue our goal of doing the right thing.

We commit that by 2023 Vistra will:

Reduce our business air travel by

20%

Reduce our office energy consumption by

40%

Reduce travel to work carbon emissions by

40%

Reduce our non-recyclable office waste generation by

40%

Approved by our ExCo, each Regional Managing Director and leadership team is responsible for hitting these targets.

Future carbon reduction initiatives

Our sustainability roadmap to further reduce our carbon footprint includes a feasibility study into how we can adopt a Net Zero Carbon approach across our business operations.

2022 managing carbon output in our supply chain

Addressing systemic challenges requires a systemic response. No one firm or set of corporations can do it on their own. Our external partnerships complement our work with clients and game-changing initiatives guided by our sustainability-related strategies and commitments. We're aware that our impact on the world stretches beyond our own carbon footprint. We know that the companies we work with also have an impact on the world around us.

In 2022, we will be launching a sustainable procurement guidance policy to ensure that sustainability and carbon reduction is part of our supplier decision process.

Doing the right thing is a core Vistra value and something we each strive towards every day.

Alan Brown
CEO, Vistra



2. Our sustainability commitments are active and alive

Our ExCo and strong policies and practices help us manage a broad spectrum of financial and non-financial risks across our businesses, focusing on what's best for the firm, our colleagues, and the world at large.

When it comes to managing our business responsibly and ensuring we meet the highest standards of governance, the ExCo is responsible for overseeing the management of the firms' most significant risks, placing meaningful focus on our long term operations.

The ExCo also has primary oversight of our firmwide approach to sustainability and our operating principles, including reviewing and setting company-wide policies. Our sustainability policies and procedures provide transparency into our practices and are developed through regular consultation with stakeholders, including regulators and investors.

Importantly, sustainability oversight is not limited to the ExCo, but also informs discussions with the full Board and its various other business committees on topics ranging from climate risk, to human capital management, to the firm's broader sustainable finance initiatives.

In addition, each Vistra market reviews their framework every quarter, ensuring the correct actions are being taken, progress is being made, and discussions are held on how we can further develop our approach.



Managing our business responsibly

Risk management and strong corporate governance is critical to the way we run our firm. It's deeply ingrained in our culture and practice as a business which offers corporate governance solutions to thousands of organisations around the world.

In risk management, our colleagues play a vital role in helping Vistra do the right thing. We continue to focus on providing our people with the tools and resources they need to effectively identify and escalate potential risks in their day-to-day activities, which includes training with respect to environmental and social risk. Employees receive specialised training for sectors and industries we believe have higher potential for such risk.

Our overall approach to sustainability issues is applicable across our sectors, services, and operating jurisdictions, including environmental and social risk management. Our commitment to regulators and fiscal authorities is a core part of running our business responsibly and as a result, we develop strong relationships with these stakeholders and engage with them on future developments.

Regardless of where we operate, our commitment to sustainability remains the same. Our colleagues are supported by leading technology and processes that meet the highest international compliance standards so we can meet our obligations to our stakeholders – it is a key part of doing the right thing.

John McLean
General Counsel





3. Embracing diversity, equality and inclusion

Our Diversity, Equality and Inclusion framework (DE&I) commits Vistra to:

- Promoting a fair, inclusive and collaborative work environment for all colleagues
- Ensuring people decisions are based on merit
- Leveraging the abilities of our colleagues to serve the needs of our clients, community & business
- Providing colleagues with career development opportunities
- Ensuring all colleagues are treated with respect

Every leader and colleague must play a part in creating, embedding and maintaining an inclusive culture. Leaders have a particular responsibility to model inclusive behaviours.

Diversity and Respect in the Workplace

Our colleagues understand and demonstrate behaviours which underpin our values and our Code of Business Conduct and Ethics.

Listening and Engagement

We seek colleague feedback and views through our regular Culture and Engagement Surveys, check-in discussions and spot polls, as well as the regular dialogues in normal business. Specifically, we:

- Build a 'culture of listening' via surveys, focus groups and meetings that help us to identify areas where we are doing well and opportunities for us to improve
- Review attrition via exit surveys, as well as understand and why our colleagues stay with us via 'stay interviews'
- Support community and interest groups (e.g. Vistra Senior Women's Network and local CSR groups), that reach across borders and organisation boundaries so we can create an environment where everyone feels a sense of ownership and belonging

Adaptative Working

An inclusive culture recognises that we can't have a one-size-fits-all approach for where and how people work. Our Remote and Adaptive Working Framework fosters an environment that supports a diverse, flexible and adaptive workforce:

- Flexibility in how and where we work to meet the changing needs of our clients and colleagues
- Our businesses are empowered to regularly review local flexible working policies to be supportive of changing lifestyle demands and ways of working, and changes that impact the global frameworks/policies are reviewed and escalated by regional HR leads
- Opportunities for transfers are advertised internally to enable colleagues to further develop their own career path

Managing and assessing our progress

Diversity, Equality and Inclusion is built into many of our processes and shapes how we frame our policies. To keep us moving ahead on this journey, we are developing a key set of metrics that our ExCo can agree on and our Board will review.

We will use this data in an effort to ensure we maintain a mix of contrasting perspectives and backgrounds that reflect the diversity of Vistra and the clients we serve. This helps us to attract and retain great talent.

We believe in the power of people and are committed to creating a place where everyone feels valued, and is challenged to grow and achieve ambitious goals together as one Vistra team.

David Chin
Chief HR Officer



4. Enabling our clients to meet their ESG obligations

The Vistra ESG Service roadmap will deliver a series of products and services to help clients meet their evolving ESG obligations and manage their impact on the world.

We believe every firm is on a journey to a more sustainable business model – and our commitment is to help them seize that opportunity. To do that, we're developing products and services to help our clients:

- Collect, analyse, and manage data from across their portfolio of companies in a way that helps the client assess their standing against a range of ESG regulatory frameworks
- Administer and report on their performance against these regulatory frameworks
- Interpret their ESG data and implement changes to the way they manage their human capital policies and governance processes and policies
- Manage and administer their ESG regulatory obligations

These products and services are being piloted with a small group of clients in the second half of 2021. The services will be adapted and rolled out based on the results and feedback from the pilot program. Please talk to your Vistra contact for more information on our product and service roadmap.

Around the world, investors and corporates face a huge disruption to their legacy ways of working through new ESG regulations. We're developing services that will help them meet their obligations and build a more sustainable business.

Justin Damer
Chief Officer: Strategy, Services
and Sustainability



5. Supporting communities

We believe it's important to support the growth of the communities in which we work and live – so we do. Our teams contribute to society and the local communities in which we operate, providing opportunities for every colleague to give back at the local level.

Around the world, our colleagues volunteer their time as well as raise funds for groups and organisations in their local communities. Vistra supports employees' charitable efforts by encouraging engagement in CSR initiatives and projects to improve our impact as a company.

As a collective group, Vistra has chosen three key themes for our Community Investment Programme - children, education and the environment.

To promote the Community Investment Programme across our network, we actively share experiences of CSR in all our markets and acknowledge best in class projects through showcasing them through global internal channels as well as on our corporate website. This has the following impacts on our stakeholders:

For our colleagues, it's a way of giving back and engaging in our Community Investment Programme. Around the world, our employees volunteer time as well as raise funds for groups and organisations in their local communities.

For our communities, it's a way for Vistra to tangibly support them across three identified global themes: children, education and the environment.

For our clients, it's a way to start their own philanthropic and charitable endeavours, while also taking their investments and their businesses across borders.

For our industry, it's a way to highlight the positive role we all play in making it easier to do business across borders – and so grow economies.

Raising governance and compliance standards in the Not For Profit sector

All our work to support the communities in which we live and work is underpinned by our efforts to develop global best practices in compliance and corporate governance, so that organisations operate to the highest standards possible. We believe that if we can use our skills and knowledge to help those who help others meet these standards, then we will contribute to a better future.

As a result, we're currently investigating and developing a new strategic support program to help Not For Profits adopt the very best Corporate Governance. The programme will launch in 2022 and we will work with named organisations to assess their current approach to corporate governance, benchmark it against best practice, identify areas in which the partner can improve and work with them to help develop their plans, operating processes and manage their operations with them.

Doing the right thing – our path forward

Doing the right thing at Vistra is something we're deeply committed to. But we're not complacent. We know that, like every organisation, we have to continually evolve the way we manage our business and strive to manage the impact we have on the world.

Our colleagues are focused on raising standards and ensuring that Vistra, our clients and the communities in which we live meet the obligations we have to each other and future generations.

Focus area	Objective	Delivery strategy	Accountability and Reporting metrics
Governance of our sustainability initiatives	Ensure carbon reduction requirements are embedded across our business	<ul style="list-style-type: none"> – Appoint ExCo level sponsor – Develop and build expertise through employee engagement and communications – Review our carbon reduction targets and performance every year – Annual review of milestones and roadmap with senior managers 	Justin Damer appointed ExCo sponsor Quarterly review of carbon reduction requirements Annual OKR on carbon reduction imbedded in senior management objectives Employee comms programme scheduled for Oct 2021
Carbon reduction programme	Ensure we minimise our own carbon footprint	<ul style="list-style-type: none"> – Reduce our business air travel by 20% – Reduce our office energy consumption by 40% – Reduce travel to work carbon emissions by 40% – Reduce our office waste generation by 40% 	Annual reporting by country and group functions
Sustainable procurement	Engage with our suppliers and partners to ensure they're focused on carbon reduction	<ul style="list-style-type: none"> – Review our offer and approach to partners and suppliers to ensure they have a carbon reduction plan in place – Participate in industry group and forums that encourage cross-sector collaboration, sharing of best practice and lessons learned 	Number of partners and suppliers that we engage at group and country level
DE&I	Promoting a fair, inclusive and collaborative work environment for all colleagues	<ul style="list-style-type: none"> – Commit to Diversity and Respect in the Workplace > Our colleagues understand what are expected workplace behaviours through our values and our Code of Business Conduct and Ethics. – Listen and engage > We seek colleague feedback and views that include our regular Culture and Engagement Surveys, Check-in discussions and spot polls as well as the regular dialogues that happen as part of normal business. – Adapt our Working practices > An inclusive culture recognises that we can't have a one-size-fits-all approach for where and how people work. Hence, to help our colleagues better balance and integrate their work and personal lives, we have introduced our Remote and Adaptive Working Framework to foster an environment that supports a diverse, flexible and adaptive workforce. 	The Board signs off our DE&I Framework. The Board or a delegated committee will review on at least a yearly basis key metrics that measure implementation and progress against our DE&I Framework The ExCo is responsible to build, monitor and assess the effectiveness of our strategy and practices in achieving our inclusive culture. They are responsible for ensuring appropriate communication, metrics and implementation of the framework Regional and local leadership teams are responsible to ensure adoption of the framework and to adapt to local practices and local statutory requirements All colleagues have a personal responsibility to ensure they understand and demonstrate inclusive behaviours by living and breathing our values when dealing with colleagues and clients every day
Helping our clients meet their ESG obligations	Launch new services and products to help clients meet and manage their ESG obligations	<ul style="list-style-type: none"> – We research the needs of our clients and develop product and service roadmaps that can help them manage their ESG risk and obligations – We're working with a selected group of clients to evolve the first wave of our services in 2022 H2 	Service strategy is owned by Justin Damer on the ExCo and discussed and developed with service and country leaders across the world
Supporting communities	Harness the power and capabilities of Vistra people to support local and global communities	<ul style="list-style-type: none"> – Community investment programme ensures Vistra people can support local charities and communities – We will launch a new Corporate Governance and compliance partnership programme 	Vistra CSR committee oversees our work in this space.



Seize opportunity

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About Vistra

At Vistra, we believe your business and your people can make a difference in the world. That's why our work is focused on helping our clients act with confidence and speed to seize opportunity wherever it arises. As a global corporate service provider and fund administrator with more than 5,000 professionals in over 45 jurisdictions, we empower legal entities globally to work smarter, grow faster, act responsibly, protect capital and scale across borders – by doing what we do best: reducing risk and enhancing efficiency. Discover how we can help you and your business seize opportunity today by exploring our services at vistra.com

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