



**Environmental, Social &  
Governance Policy**

**April 2024**



# Environmental, Social and Governance Policy

## Introduction

This Environmental, Social and Governance Policy (the “**Policy**”) applies to Pirum Systems Limited including its various operating affiliates (“**Pirum**” or the “**Company**”).

“**ESG**” refers to Environmental, Social and Governance. It is a broad term that intends to capture considerations such as: (i) climate change and pollution control (*environmental*), (ii) human rights, workplace safety, community impact and modern slavery (*social*); and (iii) business ethics, board diversity and anti-bribery measures (*governance*).

Pirum is committed to ESG as a means to:

- Encourage sound business practices
- Ensure active and responsible ownership and stewardship
- Foster trust and confidence in capital markets
- Safeguard the interests of our clients
- Promote a shift of capital/investment towards sustainable companies, industries and markets
- Increase focus on the sustainability agenda
- Collaborate within the industry to reach the UN Sustainable Development Goals
- Work to achieve a sustainable future
- Foster a positive impact across all the communities our work touches

This ESG Policy reflects our current approach to ESG issues in accordance with the principles laid down in the United Nation’s Sustainable [Development Goals](#) and [Global Compact](#) (all links correct at the time of publication).

By considering ESG issues in our business, we aim to:

- (i) identify future opportunities for improvement whilst managing our business growth and material risks; and
- (ii) work with all relevant stakeholders to achieve a sustainable future for all.

This ESG policy will evolve over time to reflect changes in business practices, business structures, technology and relevant legislation. Accordingly, we monitor this ESG Policy on an ongoing basis and review our approach annually.

Overall responsibility for ESG related matters lies with the General Counsel & Compliance Officer (GC) in their capacity as ESG lead and Chair of the ESG Committee. The “**ESG Committee**” is a cross-departmental committee that consists of the Chief Executive Officer, the Chief Financial Officer, the GC and the People Director and meets on a quarterly basis in order to identify Pirum’s ESG priorities and monitor performance and progress with achieving these priorities.

ESG related matters are also considered at Board level on a regular basis. The Chairman of the Board acts as Pirum’s ‘ESG Champion’ on Board level.



## Policy principles

Pirum has established this ESG Policy in accordance with six guiding principles. For the avoidance of doubt, the Company also complies with relevant regulations governing the environmental and business practices of the jurisdictions in which we conduct business.

### **Principle 1: Environment – managing and minimising environmental impact.**

Beyond meeting compliance requirements, Pirum believes that there are numerous opportunities to deliver commercial value through ongoing improvements to environmental management, focusing on:

- Energy – managing and minimising energy usage and using renewable energy in our offices and data centres
- Waste – following the waste management hierarchy (prevent, reduce, reuse, recycle, dispose) in our offices
- Water – managing and minimising water usage in our offices
- Carbon – maintaining certified carbon neutral+ status since 2021
- Net Zero – achieving net zero status by 2050

Pirum also offers all employees the opportunity to take part in our cycle to work scheme to promote the use of a carbon-neutral form of transport when commuting. Our Travel Policy provides for responsible business travelling (including economy class as far as possible, and rail instead of flights to the extent practicable).

Pirum has taken several other steps to promote environmental responsibility, such as tracking and annually reporting progress to our Board and investors, thereby ensuring that there is accountability in this regard.

### **Principle 2: People – respecting and valuing all employees.**

We know that having appropriate policies which focus on the protection of human rights, occupational health & safety and wellbeing of our employees, along with fulfilling roles and a work environment where our employees can build long-term careers, will contribute to an engaged and motivated workforce.

As an equal opportunities employer, we not only value diversity but see it as integral to our success as a company. As such we are deeply committed to providing an inclusive, mutually respectful workplace for our employees which is free of discrimination and harassment. We believe in recognising people based on merit and ability alone and we do not discriminate, or tolerate discrimination, on the basis of race (including colour, nationality and ethnic or national origins), sex, sexual orientation, age, disability, gender reassignment, marriage and civil partnership status, pregnancy and maternity, religion or belief.

We uphold our Equal Opportunities Policy in all aspects of employment, including recruitment and selection, promotion, transfer, training, compensation and benefits.

Where possible we will:

- Provide flexibility to employees in managing their work/life balance
- Offer opportunities for learning and development
- Identify and invest in talent
- Operate open two-way communication with employees



- Hire and promote a diverse workforce
- Ensure the health and safety of all employees

Additionally, Pirum supports industry groups, through sponsorship and volunteering, and promotes diversity and inclusion within the securities finance industry by fostering professional connections, mentoring, collaboration and knowledge sharing. Please see further our [Diversity, Equity & Inclusion Policy](#).

**Principle 3: Anti-slavery, child and forced labour – adopting a zero-tolerance approach.**

Pirum is committed to ensuring that we are not complicit in any human rights abuses. We have a zero-tolerance approach to slavery and are committed to preventing acts of slavery and human trafficking from occurring within our business and supply chain. We expect the same high standards from our contractors, suppliers and business partners. Pirum therefore conducts appropriate due diligence procedures to ensure that there is no slavery, human trafficking or the like in its supply chain. This includes screening of subcontracting arrangements by way of onboarding questionnaires.

Pirum complies with all applicable laws, statutes and regulations in force in relation to offences involving slavery and human trafficking, including the Modern Slavery Act 2015 in the UK, which consolidates existing offences of human trafficking and slavery and considers trafficking for all forms of exploitation. Although Pirum considers the risk of modern slavery in its supply chain to be low, it takes its responsibilities to combat modern slavery seriously as demonstrated by the above screening procedures and the inclusion of a Modern Slavery Statement on our website, as shown at Appendix A (*Modern Slavery Statement*) hereto.

Other than with regards to paid internships, Pirum does not employ any person below the age of 18 years in the workplace. Pirum prohibits the use of child labour and forced or compulsory labour. No employee is made to work against his/her will or is subject to coercion of any type related to work. Our employment contracts to all employees are written in plain English, indicating the scope of and procedures for leaving the job. Employment contracts and other records, documenting all relevant details of the employees, including age, are maintained and open to verification by authorised personnel or relevant statutory body. In addition to this, Pirum is committed to paying its employees, fair, equal pay based not only on the real cost of living, including the Living Wage, but in line with the salary standards across the Fintech industry as a whole.

**Principle 4: Community – delivering positive community engagement.**

Pirum is committed to engaging with charities, schools and social enterprises to provide support and resources to a variety of local and global projects.

This includes working with the 10,000 Interns Foundation and supporting charities such as Smart Works, Child Bereavement and Honeypot Children's Charity, as well as engaging in various fundraising initiatives for organisations such as the British Red Cross and Feed the Children.

Through these initiatives we also provide the opportunity for Pirum staff to get involved in practical work, fundraising activities and by training and mentoring interns. Since 2022, we have also introduced two paid volunteering days per employee and calendar year.



**Principle 5: Business ethics – operating to the highest ethical standards.**

We hold ourselves to the highest ethical standards and expect honest and transparent behaviour and business practices from our workforce, customers, business partners, investors and suppliers at all time. Accordingly, Pirum and its internal and external stakeholders are expected to:

- Maintain high ethical standards and act with integrity at all time
- Promote clear anti-corruption and anti-bribery policies and practices
- Mitigate any risks associated with labour practices and environmental impacts throughout the supply chain

**Principle 6: Governance – operating to the highest standards of corporate governance.**

Pirum adopts a responsible approach to corporate governance, organising at least five formal Board meetings each year, which focus on strategic planning and business opportunities, whilst also ensuring that the Company adheres to its corporate values and ESG objectives.

Our ‘good governance’ commitment includes:

- Maintaining a comprehensive suite of compliance policies and procedures
- Providing regular compliance training to employees
- Retaining external professional advisors to benefit from independent legal/compliance advice
- Ensuring accurate and periodic ESG reporting to relevant stakeholders (including the Board and our investors) to ensure transparency relating to our business practices and their impact



## Appendix A Modern Slavery Statement

### Introduction

This Modern Slavery Statement (“**Statement**”) has been prepared in accordance with section 54(1) of the Modern Slavery Act 2015. This Statement describes the steps Pirum Systems Limited, and its UK affiliates (together “**Pirum**” or the “**Company**”), has introduced and/or maintained during the financial year 1 April 2023 to 31 March 2024 to prevent modern slavery (including child, slave and forced labour) and human trafficking (together “**Modern Slavery**”) from occurring in any part of its business and in any of its supply chains.

### About Pirum

Pirum was founded in 2000 with the objective of automating the full post-trade lifecycle for the securities finance and collateral management industries. The Software as a Service (SaaS) platform has since become the industry gold-standard globally for post-trade automation and connectivity solutions. Today, the Pirum platform is used and trusted by over 120 leading financial institutions around the world, covering both buy- and sell-side activities.

Pirum is committed to doing business ethically, in accordance with the highest standards of integrity, and to maintaining a culture which reinforces and encourages this commitment within the organisation, as well as externally with respect to its business partners and suppliers. Modern Slavery in any form is not tolerated, directly or indirectly.

### Our Operations

The SaaS technology sector is generally considered a low-risk industry for Modern Slavery practices. Nevertheless, Pirum has implemented an appropriate risk-based approach to address any areas of its operations in which risk might arise.

Over the past fiscal year, Pirum has focused on: (i) reviewing and reaffirming our recruitment practices; and (ii) developing our supply chain due diligence and monitoring procedures to reinforce the expectations we have of our suppliers. These efforts have included:

- *Recruitment:* All successful candidates joining Pirum as employees are subject to robust pre-employment checks, including identity and right to work, criminal record, reference, and where applicable, academic and professional background checks.
- *Supplier Due Diligence:* All Pirum suppliers are subject to periodic due diligence/monitoring and a requirement to declare compliance with applicable laws and/or regulations on Modern Slavery.

These procedures help our Legal & Compliance and People teams identify any potential causes for concern and create the opportunity for follow-up action, where necessary. In the new fiscal year, we aim to strengthen these procedures further and develop even closer relationships with our suppliers.

To date no incidences or suspicions of modern slavery have been identified within our business operations or supply chains. However, in the event of such incidences or suspicions, Pirum: (i) encourages a culture of speaking up; and (ii) maintains appropriate procedures to investigate and take action as required. This is evidenced in our Employee Handbook and throughout our compliance policies, as well as in our code of conduct training, applicable to all of Pirum’s workforce.

**Policies**

Pirum maintains several Company policies and procedures that relate to the topic of modern slavery, namely:

- Background Check Policy
- Environmental, Social & Governance (ESG) Policy
- Diversity, Equity & Inclusion (DEI) Policy
- Third-Party Risk Management Policy & Procedure
- Whistleblowing Policy

**Looking Ahead**

We are committed to regularly reviewing and improving our practices. Accordingly, we will update and publish this Statement annually in connection with our review of Pirum's compliance policies and procedures. Should you have any questions about this Statement, please contact Pirum Legal via [legal@pirum.com](mailto:legal@pirum.com).

Signed,

**Philip Morgan**

Chief Executive Officer

Date: April 2024