

Sustainability Policy



		VERSION:	1
EFFECTIVE DATE:	18 December 2022	REVISION DATES:	

ABOUT US

We help businesses that do good, do better. As a leading fund administrator and corporate service provider, we work with clients who are making a difference in the world, whether they're developing new technology, new ways of investing or new ways of working.

Behind their work, we manage and secure their entities so they can employ more people, expand into new markets, improve their productivity, and structure their businesses more efficiently.

Doing the right thing is at the heart of our business. It's one of Vistra's core values and a commitment we focus on every day.

APPLICATION

This policy applies to all Vistra offices.

The Managing Director is ultimately responsible for the implementation of this policy in local offices.

CUSTODIAN

The custodian of this policy is the Board. The Board is supported by all Managing Directors of Vistra in implementing this policy.

The Chief Strategy, Services and Sustainability Officer is responsible for the administration and revision of this policy. This policy will be reviewed annually, and appropriate changes will be made should these be required.

DEFINITIONS

Where the context admits words and phrases used in this document shall bear the same meaning as in the [Vistra Glossary of Terms](#) or be interpreted as follows:

POLICY

SUSTAINABILITY COMMITMENT:

We strive to run a sustainable, equitable and diverse business through a combination of prudent investment decisions, our operating structure, and our client service offerings.

1. ENVIRONMENTAL

1.1. Overview: We have embedded environmental considerations more fully into our decision making. We are committed to reducing our energy use and carbon emissions in particular. We recognize that our impact is broader than the impact that is generated directly from within the Vistra Group. It extends to our entire value chain. As a result, we will strive to reduce these environmental impacts where we have direct control and look to influence behaviour where we can.

1.2. Climate Change: We understand that climate change represents one of the Planet's greatest challenges. As a first step we have made Sustainability Commitments which are published on our [Doing the right thing | Vistra](#). Our long-term goal is to become a carbon neutral organisation.

2. SOCIAL RESPONSIBILITY

2.1. Overview: We understand that people - our clients and our colleagues - are at the heart of our business. We strive to create a fair and equitable work culture for all.

2.2. Culture, Engagement and Growth: We look to create an open and inclusive culture across Vistra ensuring that that our colleagues have equal opportunity to grow, develop, and contribute, in keeping with Vistra's overall values. We take specific measures to foster both personal and professional growth for employees at all levels of the organization through annual performance reviews, career conversations, role-specific training and professional development opportunities.

2.3. Diversity, Equality and Inclusion: We embrace and value diversity in all its forms, whether gender, age, ethnicity, skills or cultural background which is borne out within our Diversity, Equality and Inclusion framework. We seek to

maintain a positive workplace, free from discrimination and harassment for all colleagues and promote an environment of fairness and equality. Our commitment to diversity, equality and inclusion applies to all levels of the organisation as we recognize that diversity strengthens performance and promotes long-term shareholder value.

2.4. Supporting our Communities: We have a long commitment to supporting the communities in which we operate, through charitable and social impact initiatives in multiple forms. We have various groups across Vistra that actively engage with and contribute to our local communities and run specific groupwide outreach and support activities to address topical issues.

3. GOVERNANCE AND CORPORATE CONDUCT

3.1. Overview: We view good governance as essential to creating and preserving value for our clients, colleagues, shareholders, and communities. It is essential to ensure that we manage our business and affairs well and promote long term growth for Vistra in line with our stated Risk Appetite statement. We also know that we operate in an increasingly regulated environment and it is vital that we meet the evolving standards of conduct wherever we do business.

3.2.1 Accountable, Corporate Governance: We have an effective and highly engaged Executive Committee (“ExCo”) and embrace senior management diversity in all its aspects, including skills, gender, ethnicity, and race. All colleagues at every level have the responsibility for professional conduct and ethical behaviour in accordance with our Code of Conduct and annual colleague declarations.

3.2.2 Accountable, Transparency: We believe in the need to be publicly accountable to our sustainability commitments and keep our stakeholders informed of our progress.

3.2.3. Ethics: Our executives and all colleagues are expected to conduct themselves in accordance with the highest moral and ethical standards, governed by a robust Code of Business Conduct and Ethics policy. We encourage honest and direct communication to resolve issues and concerns in an open manner and have also established a whistle-blower platform that provides an alternative and anonymous method of reporting matters of concern that can be accessed by all employees globally.

3.2.4. Human Rights: Our Code of Conduct and Ethics Policy is designed to reflect our support for the preservation of basic rights and human dignity in the workplace and beyond and support internationally recognized human rights principles that promote and protect human rights around the world.

4. SUSTAINABILITY GROUP STRUCTURE

Our Sustainability Committee oversees our policies and targets to ensure that Vistra acts as a responsible organization in respect to the environmental, social and governance matters. The Committee is led by the Chief Strategy, Services and Sustainability Officer, who is a member of “ExCo”.

The Sustainability Committee meets on a quarterly basis to discuss and review priority areas of Environmental, Social and Governance agenda that impact Vistra. The Committee makes recommendations and presents these to ExCo and the Group CEO who are ultimately responsible to the Board of Directors for ensuring that Vistra has the necessary policies, processes, and procedures in place.

The Sustainability Committee is supported by green teams in the key country locations and works closely with other stakeholders across Vistra such as the Enterprise Risk Management team.