



Environment, Social and Governance Report

EMEA & APAC

2022



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1. About Sterling Lexicon

Mobility Optimised

Vision 2025

Mobility Optimised

Sterling Lexicon is setting a new standard in employee relocation services. Our innovative, end-to-end solutions can be tailored to the requirements of our customer's business, culture and locations.

Our extensive relocation services means every employee gets a personalised experience and global mobility teams get to meet their management and operational goals.

Sterling Lexicon was founded in 1991 with the objective to help individuals, employees and companies with their own goals by providing comprehensive domestic and international global mobility solutions through innovative services, advanced technology and the best people in the industry.

What began as moving one person locally, has flourished into managing more than 33,000 relocations annually, drawing on the resources of 14 regional offices and serving 180 countries across the globe.

Our services and global footprint have developed in response to our client's geographical growth, their objectives, and their relocating employee's needs.







Vision 2025

Mission Statement

To serve our customers, communities and each other with the highest level of care, making lives easier by delivering in moments that matter

Vision 2025 Strategic Pillars

 <p>Modernize & Innovate the Business</p>	<p>Drive simplification, change and continuous improvement to add value for our stakeholders</p>
 <p>Foster a Rewarding Workforce Experience</p>	<p>Foster a culture and environment in which our workforce can thrive, grow and be rewarded</p>
 <p>Drive Profitable Revenue Growth</p>	<p>Optimise and leverage the portfolio of products and services to profitably deliver solutions for our customers</p>
 <p>Deliver an Excellent Customer Experience</p>	<p>Be the most dependable, easiest and caring company to do business with</p>

Our Values

Sterling Lexicon is a global team that cares for customers, partners, communities and each other. Sterling Lexicon's values are the heart and soul of our company. Our values represent who we are, how we work, and who we aspire to be. We live by these values every day and this is reflected in our interactions with each other, our customers, our partners and the communities we serve.



Caring

We care about each other, our customers, partners and community. We provide a caring and safe environment that supports our employees' growth, development and wellbeing



Teamwork

We win together, as one team around the globe, respecting and encouraging the perspectives of others, with full commitment to each other, our customers and our common success



Trust

We foster an environment of trust through our integrity and always doing the right thing the right way. We fulfil our promises to each other and our customers by being reliable, transparent and trustworthy



Innovation

We strive to innovate, inspiring and encouraging passionate and creative ideas that solve customer problems and improve how we work



Agility

We are agile and flexible. We think and act quickly to creatively solve unique customer and employee challenges, while readily adapting to changing market needs



2. Our ESG Programme

Our ESG Journey

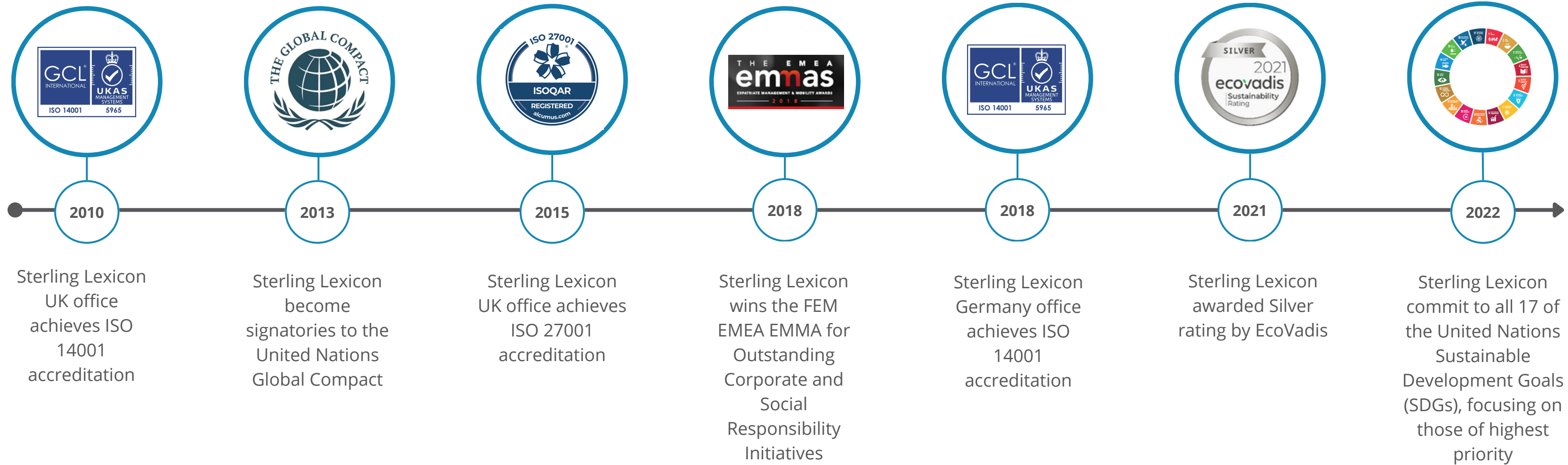
Accredited Management Systems

UNGC Alignment Index

United Nations Sustainable Development Goals

Our Commitment to the Sustainable Development Goals

Our ESG Journey



Accredited Management Systems

Sterling Lexicon follows guidelines from the most respected organisations to ensure responsible environmental, social and governance management systems.



EcoVadis

EcoVadis is an independent organisation that provides holistic sustainability ratings covering Environmental, Labor & Human Rights, Ethics and Sustainable Procurement impacts.

Sterling Lexicon has been awarded a Silver rating, placing us in the 88th percentile of 75,000 companies rated and is testament to every employee's commitment to making us a responsible business.



UN Global Compact Agreement

Sterling Lexicon has upheld the principles of, and been a formal signatory of, the United Nations Global Compact (UNGC) since 2013. These principles guide our ESG strategy and our culture.

Upholding these principles guides Sterling Lexicon's policy framework for the development, implementation, and disclosure of human rights, labour, environment and anti-corruption policies and practices.



ISO 14001

The ISO 14001 accreditation confirms Sterling Lexicon is managing the aspects of our business which have a significant impact on the environment. Sterling Lexicon's ISO 14001 accreditation is valid until 25th May 2024.



ISO 27001

Sterling Lexicon ensures strict adherence to applicable global data protection laws, while keeping client and employee data secure. Sterling Lexicon's ISO 27001 accreditation is valid until 2nd June 2024.



FIDI FAIM Moving & Destination Services

Sterling Lexicon proves compliance with the stringent FAIM Moving and Destination Services requirements, covering topics such as data protection, supply chain management and anti-bribery and corruption processes.

UNGC Alignment Index

The following principles show our Communication on Progress (COP) to the United Nations Global Compact (UNGC):

UN Global Compact Principle	Sterling Lexicon Alignment
<p>Human Rights</p> <p>Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights; and</p> <p>Principle 2: Make sure that they are not complicit in human rights abuses</p>	<p>Code of Conduct and Business Ethics Human Trafficking Policy Supplier Code of Conduct</p>
<p>Labour</p> <p>Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;</p> <p>Principle 4: the elimination of all forms of forced and compulsory labour;</p> <p>Principle 5: the effective abolition of child labour; and</p> <p>Principle 6: the elimination of discrimination in respect of employment and occupation</p>	<p>Code of Conduct and Business Ethics Human Trafficking Policy Supplier Code of Conduct Diversity Policy Harassment Policy Employee Handbook Employee Terms and Conditions</p>
<p>Environment</p> <p>Principle 7: Businesses should support a precautionary approach to environmental challenges;</p> <p>Principle 8: undertake initiatives to promote greater environmental responsibility; and</p> <p>Principle 9: encourage the development and diffusion of environmentally friendly technologies</p>	<p>Code of Conduct and Business Ethics Human Trafficking Policy Supplier Code of Conduct Environmental Policy ISO 14001 Accreditation</p>
<p>Anti-Bribery and Corruption</p> <p>Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery</p>	<p>Code of Conduct and Business Ethics Supplier Code of Conduct Anti-Bribery and Corruption Policy</p>



Sterling Lexicon EMEA and APAC Priority Goals

Sterling Lexicon EMEA and APAC is committed to all 17 of the United Nations Sustainable Development Goals (SDGs), focusing on those of highest priority in 2022. Being a responsible business, we are focusing on those SDGs where we can have the biggest impact through our business activities, while ensuring our chosen SDGs cover all four UNGC principle areas.

Our Commitment to the Sustainable Development Goals



SDG 3: Good health and wellbeing
Ensure healthy lives and promote well-being for all at all ages

Sterling Lexicon commitment

We will advocate for physical and mental wellbeing for our employees, clients and supply chain and ensure Sterling Lexicon is a happy and healthy place to work.



SDG 10: Reduced inequalities
Reduce inequality within and among countries

Sterling Lexicon commitment

We will advocate for inclusion, diversity and social mobility within, and on behalf of, our community, and ensure Sterling Lexicon is a fair and inclusive place to work.



SDG 12: Responsible consumption and production
Ensure sustainable consumption and production patterns

Sterling Lexicon commitment

We will promote sustainable practices and reporting, working with our community and our employees to reduce the consumption of resources.



SDG 13: Climate action
Take urgent action to combat climate change and its impacts

Sterling Lexicon commitment

We will embed environmentally friendly practices into our services and management systems to increase our impact on climate action.



SDG 16: Peace, justice and strong institutions
Promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels

Sterling Lexicon Commitment

We will follow guidelines from the most respected organisations to ensure we promote and adhere to the highest standards of professionalism, integrity and ethics.



3. Environment

Related UNGC Principles

Principle 7:
Business should support a precautionary approach to environmental challenges

Principle 8:
Undertake initiatives to promote greater environmental responsibility

Principle 9:
Encourage the development and diffusion of environmentally friendly technologies.

Related UNSDGs



Responsible Business

Code of Conduct and Business Ethics

Sterling Lexicon's Code of Conduct and Business Ethics and Core Values guide our employees in their commitments to each other, our clients, our partners and the communities in which we live and work.

Reducing our impact on the environment by implementing sustainable practices is a key message in our Code of Conduct and Business Ethics.

Our Core Values are the heart and soul of our company. They represent who we are, how we work and who we aspire to be. We live by these values each and every day, they are reflected in our interactions with each other, our customers, partners and communities we serve. Our Core Value of "Caring" underpins our commitment to the Environment.



Caring
 We care about each other, our customers, partners and community. We provide a caring and safe environment that supports our employees' growth, development and wellbeing

Vision 2025

"Foster a Rewarding Workforce Experience" is a Core Strategy within Sterling Lexicon's Vision 2025. As part of this Core Strategy Sterling Lexicon is committed to "expanding our Corporate Social Responsibility efforts as a responsible corporate citizen"

Policy and Process Alignment

Sterling Lexicon's focus on the following policies and processes underpins our commitment to strong governance:

- Environmental Policy and Objectives
- Whistleblowing procedure
- Service Delivery and Support Function processes
- Client Solutions
- Supply Chain Due Diligence

ISO 14001 maintained since 2010  **40%** due to Hybrid Working Policy reduction in GHG emissions

 **Employee Champions** focused on Environment and Community to support and communicate business initiatives as advocates of this focus area

70% of supply chain network with industry accreditations

Environmental Policy

Sterling Lexicon is committed to setting environmental targets and continually measuring our performance and achieving continuous improvement in minimising the impact that our activities have upon the local and global environment.

Sterling Lexicon will ensure that every aspect of our activities is conducted in accordance with sound environmental practices, we will achieve this by:

- Minimising the consumption of natural resources and energy, whilst consuming material goods in moderation
- Reducing the creation of waste by the adoption of improved operating practices and by recycling of materials whenever practical
- Ensuring all waste and effluent is disposed of in a safe and responsible manner
- Investing in the development of new products and processes that have an improved performance regarding their impact on the environment
- Complying with environmental legislation

We aim to foster among our staff, suppliers, customers, shareholders and communities local its operations an understanding of environmental issues in the context of its business. Our collective task is to ensure that we continually improve the environmental impact of all our activities.

Environmental Objectives

As part of an ongoing process to achieve these aspirations, we have set the below objectives for 2022, with outcomes to be reported Q1 2023.

- Explore in developing environmentally friendly products/processes
- Maintain 40% of savings in GHG emissions through the Hybrid Working Policy
- Maintain 70% of supply chain network with industry accreditations
- Minimum of two initiatives and completion of Environmental training

These objectives are reviewed for continuing suitability, on an annual basis.

Compliance Hotline

Sterling Lexicon utilises Navex Global for our 24/7, confidential compliance telephone and web-based hotline. A reporting tool for employees, suppliers and clients to report a good faith concern regarding activities which could negatively impact the environment.

Compliance Helpline

Call Toll Free:
844-407-7265

Outside the United States, please use the following access codes prior to dialing the toll-free number:

• China	• France
North - 108-888	Hotels 1 - 0-800-99-1011
South - 10-811	Hotels 2 - 0-800-99-1111
• Germany - 0-800-225-5288	Hotels 3 - 0-800-99-1211
• India - 000-117	Hotels - Paris Only - 0-800-99-0111
• Singapore	Orange - 0-800-99-0011
SingTel - 800-011-1111	Telecom Development - 0805-701-288
StarHub - 800-001-0001	
• Spain - 900-99-0011	
• Switzerland - 0-800-890011	
• UK - 0-800-89-0011	

Make a Report Online:
www.suddath.ethicspoint.com

View Policies and Procedures:
Go to suddath.sharepoint.com and look for the Employee Handbook.

Contact Directly:
Compliance Officer: +1 (904) 390-7120
Human Resources: +1 (904) 390-7100
Legal: +1 (904) 390-7100
Marketing: +1 (904) 390-7100



ISO 14001 Accreditation

The ISO 14001 Environmental Management System (EMS) confirms Sterling Lexicon is managing the aspects of our business which have a significant impact on the environment.

Our ISO14001 Environmental Management System is one of the key tools we use to help guide, manage and ensure our continual improvement.

Sterling Lexicon has maintained our ISO 14001 accreditation since 2010.



Our People

- Hybrid Working Policy reducing employee travel GHG emissions by 40%
- Employee Champions focused on Environment and Community to support and communicate business initiatives as advocates of this focus area
- Employee Recognition Scheme hosting environmental awareness activities for reward points. Activities include reducing single use plastic, saving water and reducing emissions
- Mandatory requirement for all employees to adhere to our Code of Conduct, confirming they will follow Sterling Lexicon’s responsible business requirements, including environmental practices
- All employees must take mandatory induction and refresher training covering our Code of Conduct and Business Ethics, which includes our Environmental Policy



Vinegar and baking soda to clean bathroom sinks

Kiu-fung Wong 2 days ago

Buy shampoo and soap bars, use washing eggs for doing the laundry or use the local refillery to refill your detergent bottles. For shopping bring your own bags and reusable net bags for fruit and veg. Recycle and source biodegradable bin bags for rubbish !

Ruth McEvilly about 6 hours ago 1 ❤️

I take the Metro to work, then come back by bike. I move around the city by bus/metro/bike, never by car.

Laura Tarno 2 days ago

We are proud to say that we are completely paperless at STRLX Spain! At home, we have our own bags, we use Keep to do the shopping list, etc..

Alberto Hernandez 2 days ago 0 ❤️

Committed to using Microsoft Notes versus handwritten paper notes!

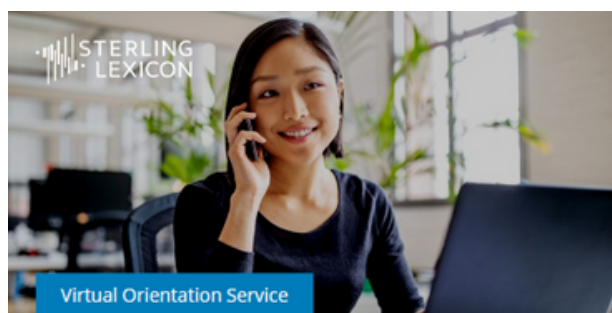
Suzanne L Smith 1 day ago 0 ❤️

Client Solutions

Global mobility teams are being challenged to reduce the environmental impact of their programmes. Sterling Lexicon is working with our clients to identify sustainable solutions while maintaining quality, cost effectiveness and transferee experience

Virtual Services

Virtual Pre-move Surveys, Area Orientation services and Home Search services, reducing both employee and assignee travel emissions.



Virtual Orientation Service

Benefits of a Virtual Orientation Service

- Reduces the environmental impact of the relocation
- Flexibility to allow for any travel and safety restrictions
- Time efficient - No travel time and fits into busy schedules
- Allows the Global Mobility/HR team to participate
- Reduced cost

Sterling Lexicon's Virtual Orientation Service supports assignees in selecting the most suitable neighbourhood, ensuring a right fit for both their budget and lifestyle.

Information is customised to ensure assignees are able to successfully navigate the nuances of living in the new location - from transportation and shopping basics to language and cultural essentials.

Presented by knowledgeable and experience experts, a Virtual Orientation Service provides assignees with the confidence to get off to the best start in their new location.

sterlinglexicon.com

Alternative Solutions to Household Goods

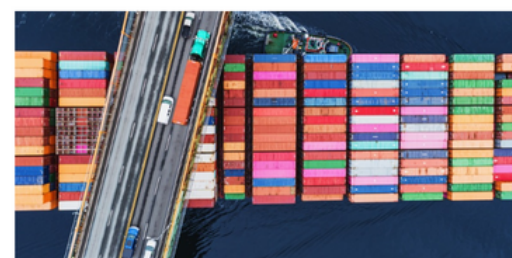
Finding alternative solutions to shipping household goods, for example:

- Reviews of volume allowance
- Removal of air freight
- Usage of excess baggage
- Usage of furniture rental

Finding Creative Solutions to Shipping Household Goods

One of the searing images of the year was the 220,000-ton, 400-meter-long container ship Ever Given wedged sideways in a single-lane section of the Suez Canal in March 2021. For global mobility professionals, this began to shine a light on a theme of delays to household goods shipments and soaring costs which increasingly became entrenched over the course of the year.

In our most recent webinar, we brought together a panel of industry experts to better understand the cause of the issue and asked global mobility professionals to provide insights on how corporate organizations can address the challenge by finding alternative solutions for household goods shipping within their employee relocation programs.



Offering a discard and donate service

Sterling Lexicon promotes the concept of “discard and donate” that provides an opportunity to work with suppliers who help remove items, helping reduce their carbon footprint with smaller shipments and less packing materials. Unwanted items are donated to charities rather than being put into landfill.

Household Goods materials

Sterling Lexicon's Household Goods function reuses wooden crates and card-based packing materials. Any materials not suitable for reuse are recycled.



Worldwide ERC's Global Mobility Sustainability Coalition

Peter Sewell, Sterling Lexicon's Managing Director EMEA & APAC is a member of the Worldwide ERC's Global Mobility Sustainability Coalition.

Peter joined representatives from Worldwide ERC®, FIDI Global Alliance, International Association of Movers, Canadian Employee Relocation Council, European Relocation Association and Corporate Housing Providers Association came together for the first time in November 2022 in an all day lab to align on a roadmap to support the broader mobility industry in developing sustainable solution.

Responsible Business Practices

- Paperless processes, including e-billing, DocuSign and Microsoft OneNote
- Sterling Lexicon utilises communication platforms to reduce business travel and limits business travel to critical only
- Environmentally conscious approach to Marketing materials and events, including reusable giveaways, downloadable documentation and electronic business cards
- Provision of a confidential Compliance Helpline allowing members of our supply chain and employees to report a good faith concern regarding environmental activities
- Only utilise rechargeable batteries for hardware. Where this is not possible batteries are recycled at recycling points in all of our offices
- IT equipment to reused and refurbished where possible, reducing waste. Should an item be beyond refurbishment it is disposed of in accordance with the EU Directive on Waste Electronic and Electrical Equipment (WEEE) regulations
- Waste recycling schemes implemented across our office network and training provided to all employees on its function and requirements

Responsible Procurement

- Dedicated in-house team responsible for ensuring all members of Sterling Lexicon's supply chain meet our strict environmental compliance standards
- 100% of our supply chain are subject to compliance and governance due diligence assessment, including a review of environmental processes, through Jaggaer, a third party procurement platform
- 100% of our supply chain are required to adhere to our Supplier Code of Conduct and Terms and Conditions, confirming they will follow Sterling Lexicon's responsible business requirements, including environmental practices
- Sterling Lexicon partners with suppliers who are committed to supporting our environmental initiatives with their own eco-friendly practices, helping us to deliver the most environmentally conscious service to our clients
- Sterling Lexicon has sourced the most energy efficient infrastructures for our office locations



Energy-efficient infrastructure at EMEA Head Office
BREEAM 2011 rating of 'Very Good'
EPC rating of B



4. Social

Related UNGC Principles

Principle 1:
Businesses should support and respect the protection of internationally proclaimed human rights

Principle 2:
Make sure that they are not complicit in human rights abuses

Principle 3:
Business should uphold the freedom of association and the effective recognition of the right to collective bargaining

Principle 6:
The elimination of discrimination in respect of employment and occupation

Related UNSDGs



Responsible Business

Code of Conduct and Business Ethics

Sterling Lexicon's Code of Conduct and Business Ethics and Core Values guide our employees in their their commitments to each other, our clients, our partners and the communities in which we live and work.

At Sterling Lexicon, we are driven by people and we hold ourselves and each other to the highest ethical standards. In our everyday interactions, we treat people fairly and honestly to create meaningful and lasting relationships. This is a key message in our Code of Conduct and Business Ethics.

Our Core Values are the heart and soul of our company. They represent who we are, how we work and who we aspire to be. We live by these values each and every day, reflected in our interactions with each other, our customers, partners and communities we serve. Our Core Value of "Caring" underpins our commitment to focusing on our people.



Caring
We care about each other, our customers, partners and community. We provide a caring and safe environment that supports our employees' growth, development and wellbeing



Affirmative Action and Equal Opportunity Employer



Dedicated

Diversity, Equity and Inclusion Council



Employee Champions

focused on Wellbeing, DE&I, Employee Engagement and Employee Recognition to support and communicate business initiatives as advocates of these focus areas

Policy and Process Alignment

Sterling Lexicon's focus on the following policies and processes underpins our commitment to strong governance:

- Code of Conduct and Business Ethics
- Recruitment Policy
- Equal Opportunities Policy
- Diversity, Equity and Inclusion Policy
- Employee Handbook

Employee Assistance Programme

As part of our efforts to maintain the mental health and wellbeing of our employees, Sterling Lexicon has an Employee Assistance Programme, provided by Unum LifeWorks.

This scheme allows employees to contact an independent adviser by telephone on a confidential basis to discuss any issue that is troubling them, causing stress or interfering with the ability to conduct their duties at work.



Unum LifeWorks

Helping in every area of your life when and where you need it



The service is completely confidential and access to advice on non-work-related matters, such as:

- Legal rights
- Finance
- Personal relationships
- Family care
- Consumer advice
- Debt advice
- Wills and probate

Recruitment

Sterling Lexicon is an Affirmative Action and Equal Opportunity Employer.

All qualified applicants will receive consideration for employment without regard to race, colour, religion, sex, sexual orientation, gender identity, national origin, or protected veteran status and will not be discriminated against on the basis of disability.

Wellbeing Employee Champions

Employee Champions focused on Wellbeing are in place to support and communicate business initiatives as advocates of this focus area.

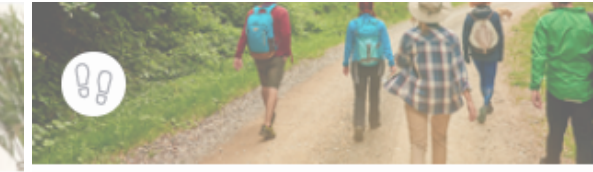
Recent initiatives include:

- Promotion of wellbeing activities on our employee recognition scheme
- Celebration of Mental Health Awareness Week
- Virtual Mindfulness sessions



World Mental Health Day Challenge

Oct 3, 2022 - Oct 24, 2022
288 participants



De-Stress with Steps

Nov 8, 2022 - Dec 4, 2022
5 points
162 participants



Challenge - "Choose Healthy"

Aug 1, 2022 - Aug 31, 2022
222 participants



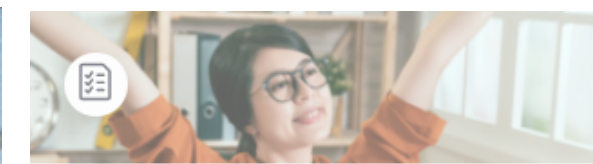
The Prescription for Financial Wellbeing

Jul 6, 2022 - Jul 31, 2022
157 participants



Employee Recognition Scheme

hosts wellbeing activities including step count, reading, mental health and nutrition challenges



The Daily Stretch

Aug 8, 2022 - Aug 17, 2022
183 participants

Diversity, Equity and Inclusion (DEI)

Our DEI Purpose

Create a merit-based, diverse and inclusive culture in which employees can do their best work while being their authentic selves.

Sterling Lexicon's DEI strategy is carried across our organisation by ensuring:

- We have alignment among the executive team to ensure shared understanding and common language
- Our employee population reflects of the diverse communities we serve
- Our employees feel heard and listened to, and confident that leadership will take the appropriate action to do the right thing
- We foster an inclusive culture that encourages collaboration, flexibility and fairness and addresses any internal barriers to full inclusion
- We understand what matters most to our employees and the interdependencies that has with talent hiring/management

We will achieve our purpose by focusing on our three DEI Strategic Pillars.

DEI Strategic Pillars



Creating an inclusive environment

"Foster a Rewarding Workforce Experience" is a Core Strategy within Sterling Lexicon's Vision 2025. As part of this Core Strategy Sterling Lexicon is committed to "fostering diversity, equity and inclusion, creating a sense of belonging."



Fostering a diverse culture

All qualified vacancy applicants and employees receive equal opportunity without regard to race, colour, religion, sex, sexual orientation, gender identity, national origin, or protected veteran status and will not be discriminated against on the basis of disability.



Providing a DEI lens on products, service and policies

Sharing our industry insights and communicating trends to help our network ensure their policies are optimised for equity and inclusion

Sterling Lexicon's supply chain spans across 180 countries and this naturally results in diversity of size, location and workforce.



Vision 2025

"Foster a Rewarding Workforce Experience" is a Core Strategy within Sterling Lexicon's Vision 2025. As part of this Core Strategy Sterling Lexicon is committed to "Fostering diversity, equity and inclusion, creating a sense of belonging"

DEI Employee Champions

Employee Champions focused on Diversity, Equity & Inclusion are in place to support and communicate business initiatives as advocates of this focus area.

Our Employee Champions are members of our Diversity, Equity and Inclusion Council.

The Diversity, Equity and Inclusion Council has a purpose to "create a merit-based, diverse and inclusive culture in which employees can do their best work while being their authentic selves".

Recent initiatives include:

- Celebrations of International Days through internal newsletters and employee recognition scheme
- Internal language lessons for employees delivered by their peers - celebrating the diverse nature of our workforce
- Employee Spotlight to honour employees from diverse and minority backgrounds

Client Solutions

Global mobility can contribute to DEI by making assignment information and opportunities more readily available throughout the organisation, widening candidate selection processes and providing different types of policy support to encourage underrepresented individuals to be able to successfully take on assignments.

Sterling Lexicon shares our industry insights and communicates trends to our client portfolio through our Client Solutions and Thought Leadership teams.

Interns: A Golden Opportunity to Win at DEI

While they may not be the first group to come to mind when seeking to fill your talent pipeline, overlooking interns could be putting your company at a disadvantage in more ways than one. Undervaluing or underinvesting in the intern population could not only lead to missed opportunities to fill key roles, but it could also be the reason many organizations are falling behind on meeting diversity, equity and inclusion (DEI) goals.

According to the National Association of Colleges and Employers (NACE), 88 percent of employers had formal diversity recruiting efforts in 2021. They also noted 67 percent of employers allocated more resources to recruit historically marginalized students.

Many employers are already deliberately investing in those about to enter the workforce with better salaries, more benefits and relocation packages. Integrating their DEI strategies within their intern programs further helps them stay a step ahead of the competition.



Language Learning Increases Effective Global Communication



July 30, 2021

Sharing our industry insights and communicating trends to help our network ensure their policies are optimised for equity and inclusion.



Global Mobility for (Crash Test) Dummies

Key Takeaways

- Gender gaps in data collection have serious consequences
- Companies are increasingly investing in Environmental Social Governance (ESG) and Diversity, Equity and Inclusion (DE&I) initiatives, both of which are integral strategies in attracting and retaining talent
- Global mobility can contribute to ESG and DE&I by making assignment information and opportunities more readily available throughout the organisation, widening candidate selection processes and providing different types of policy support to encourage underrepresented individuals to be able to successfully take on assignments.

Diversity, Equity and Inclusion as Part of a Thoughtful Global Mobility and Talent Management Framework

In her book – *Invisible Women: Exposing Data Bias in a World Designed for Men* – Caroline Criado Perez describes the gender data gap and how the vast majority of information collected is based on male lifestyle patterns and male bodies. As an example, Criado Perez describes how a woman involved in a car crash is 47% more likely to be seriously injured than a man, and 17% more likely to die. This is a result of assuming a male crash test dummy as the driver of the vehicle without taking into consideration the physical differences between genders.

While global mobility professionals are far removed from the complexities of automobile safety design, this, among the many examples Criado Perez uses, highlights the prevalence of unconscious bias in society, and along with recent geopolitical events, underscores the need for impactful diversity, equity and inclusion approaches to talent management in organizations.

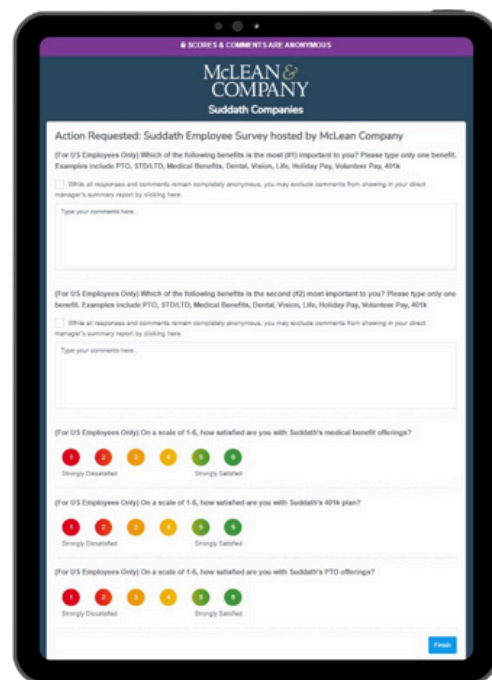
There is strong evidence to suggest that organizations are gaining an understanding of all aspects of Environmental Social Governance (ESG) and are investing accordingly. ESG refers to three key factors when measuring the sustainability and ethical impact of an investment in a business or company. These factors include how a company performs as a steward of nature. Social criteria examine how it manages relationships with employees, suppliers, customers and the communities where it operates. Governance deals with a company's leadership, executive pay, audits, international controls and shareholder rights.

Employee Engagement

Employee Engagement Survey

Every month, each employee receives a survey with one core question focusing on a specific area, such as benefits, wellbeing or career development.

Sterling Lexicon has partnered with McLean & Company, a leading HR firm, to administer this survey to ensure the confidentiality of all responses.



Employee Champions

Employee Champions focused on Employee Engagement are in place to support and communicate business initiatives as advocates of this focus area.

Recent initiatives include:

- Employee recognition in internal newsletter showcasing service feedback
- Company-wide employment anniversaries celebrated
- Employee Appreciation Week celebrated globally

Employee Development and Recognition

Training and development is a vital part of growth for all our employees. All employees are given the necessary support to:

- Develop the knowledge, skills and attitude they require to carry out their jobs effectively
- To prepare them for changes that affect their roles and tasks
- To equip them to meet the challenges and demanding objectives which are articulated in the company's business plan
- Release creativity and enable them to realise their potential

Mentoring Programme

Fostering personal development through connecting employees for support, encouragement and advice. Sterling Lexicon's Mentor Programme is application based.

Vision 2025

"Foster a Rewarding Workforce Experience" is a Core Strategy within Sterling Lexicon's Vision 2025. As part of this Core Strategy Sterling Lexicon is committed to "Create a differentiated experience that supports the career journey, well-being and work/life balance of our workforce."

Trade Unions and Collective Bargaining

Sterling Lexicon seeks to establish good relations with its employees and would happily, voluntarily recognise a trade union to conduct collective bargaining. We recognise trade unions and employee representatives can bring numerous benefits to organisations. A good employer/employee relationship will help in consulting on key business changes, such as large-scale re-structures and TUPE transfers.

We understand as an employer we may be compelled under the provisions of the Employment Relations Act 1999 to recognise a trade union for collective bargaining on pay, hours and holidays etc. However beyond the legal requirement, Sterling Lexicon are committed to establishing a culture where employee relations can be fundamental to the way in which our organisation engages with employees and can help to engender trust and transparency.

Within all employment contracts issued by Sterling Lexicon, our clause stating "English law shall apply to this Agreement and both you and the Company submit to the jurisdiction of the English courts" respects our employees' right, in accordance with relevant national laws.

This applies to all Sterling Lexicon locations. No employees of Sterling Lexicon are currently members of a trade union.

Community

Volunteering Policy

Sterling Lexicon's Volunteering Policy gives every employee one day of paid time off to undertake volunteering work at a community or charity initiative of their choice.

Sterling Lexicon supports Hillingdon Foodbank/The Trussell Trust

The Sterling Lexicon UK office has an established community partnership with Hillingdon Foodbank/The Trussell Trust. Hillingdon Foodbank provides short-term and emergency food to families going through difficult times.

In 2022, Sterling Lexicon's UK office provided 96 hours of volunteering and donated over 200 items to Hillingdon Foodbank.

Spanish lessons for displaced Ukraine's living in Spain

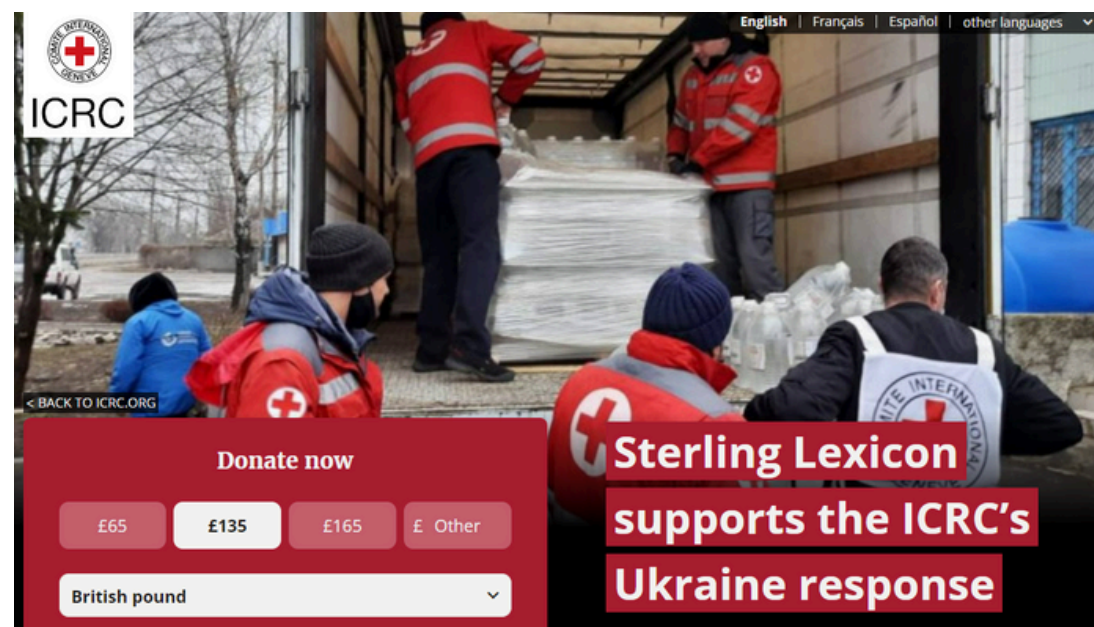
Sterling Lexicon is partnering with BiCortex Languages to deliver free Spanish lessons to Ukrainian refugees residing in Spain. Our collaboration helps cover one month of expenses which includes payment for teachers and internal resources. This initiative helps displaced Ukrainians living in Spain acclimate and find local jobs.

Sterling Lexicon supports the ICRC's Ukraine response

In 2022, Sterling Lexicon's people came together in support of of the people of Ukraine.

Sterling Lexicon established a donation page for employees to support the International Committee of the Red Cross and Red Crescent (ICRC). We are honoured to support this global organisation, as they have long provided relief and saved lives through all sorts of emergencies.

Through employee donations and corporate matching, Sterling Lexicon has so far donated £5780.00 to ICRC's Ukraine response.



In 2022, Sterling Lexicon provided 96 volunteering hours & donated 200+ items to Hillingdon Foodbank





5. Governance

Related UNGC Principles

Principle 4:
The elimination of all forms of forced and compulsory labour;

Principle 5:
The effective abolition of child labour; and

Principle 10:
Businesses should work against corruption in all its forms, including extortion and bribery

Related UNSDGs



Responsible Business

Sterling Lexicon's Code of Conduct and Business Ethics and Core Values guide our employees in their their commitments to each other, our clients, our partners and the communities in which we live and work.

Our Core Values are the heart and soul of our company. They represent who we are, how we work and who we aspire to be. We live by these values each and every day, reflected in our interactions with each other, our customers, partners and communities we serve. Our Core Value of "Trust" underpins our commitment to governance and compliance.

100% of employees trained on Code of Conduct & Business Ethics policies	ISO 27001 accredited information security system	 GDPR compliant
 Dedicated in-house Compliance team to implement business ethics measures	 Ongoing supply chain due diligence	



Trust

We foster an environment of trust through our integrity and always doing the right thing the right way. We fulfil our promises to each other and our customers by being reliable, transparent and trustworthy.

Policy and Process Alignment

Sterling Lexicon's focus on the following policies and processes underpins our commitment to strong governance:

- Anti-Bribery and Corruption
- Anti-Trust and Competition
- Human Trafficking
- Global Trade Compliance
- Whistleblowing
- Supply Chain Due Diligence

Anti-Bribery and Corruption

Sterling Lexicon is committed to complying with all anti-corruption laws, regulations, and restrictions mandated by the Foreign Corrupt Practices Act, the UK Bribery Act, the Criminal Finance Act and other laws that govern corrupt practices, including bribery.

We take our obligations seriously and conduct robust supply chain due diligence.

Sterling Lexicon is committed to competing solely on our merits. We don't give or accept gifts, gratuities or business courtesies that could be perceived as unfair business practices that would violate law, regulation or our policies or those of our suppliers or customers.

Human Trafficking & Modern Slavery

Sterling Lexicon supports human rights around the world.

We provide reasonable working conditions and fair wages and do not use child or forced labour in any of our operations. We don't tolerate or condone human trafficking or slavery and we expect the same from our business partners.

Anti-Trust and Competition

Sterling Lexicon is committed to fair competition and require strict compliance with all applicable antitrust and competition laws, regulations and policies.

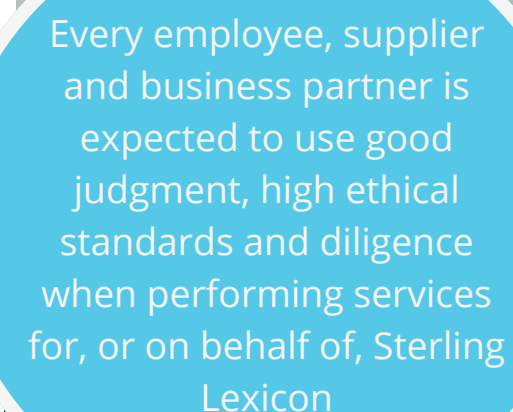
Sterling Lexicon never engages in activities with customers, suppliers or competitors that unfairly limit or prevent competition or give the appearance of doing so.

Our Anti-Trust and Competition Policy establishes mandatory guidelines and processes for all those employed or engaged with Sterling Lexicon to ensure we comply with applicable Anti-Trust Laws.

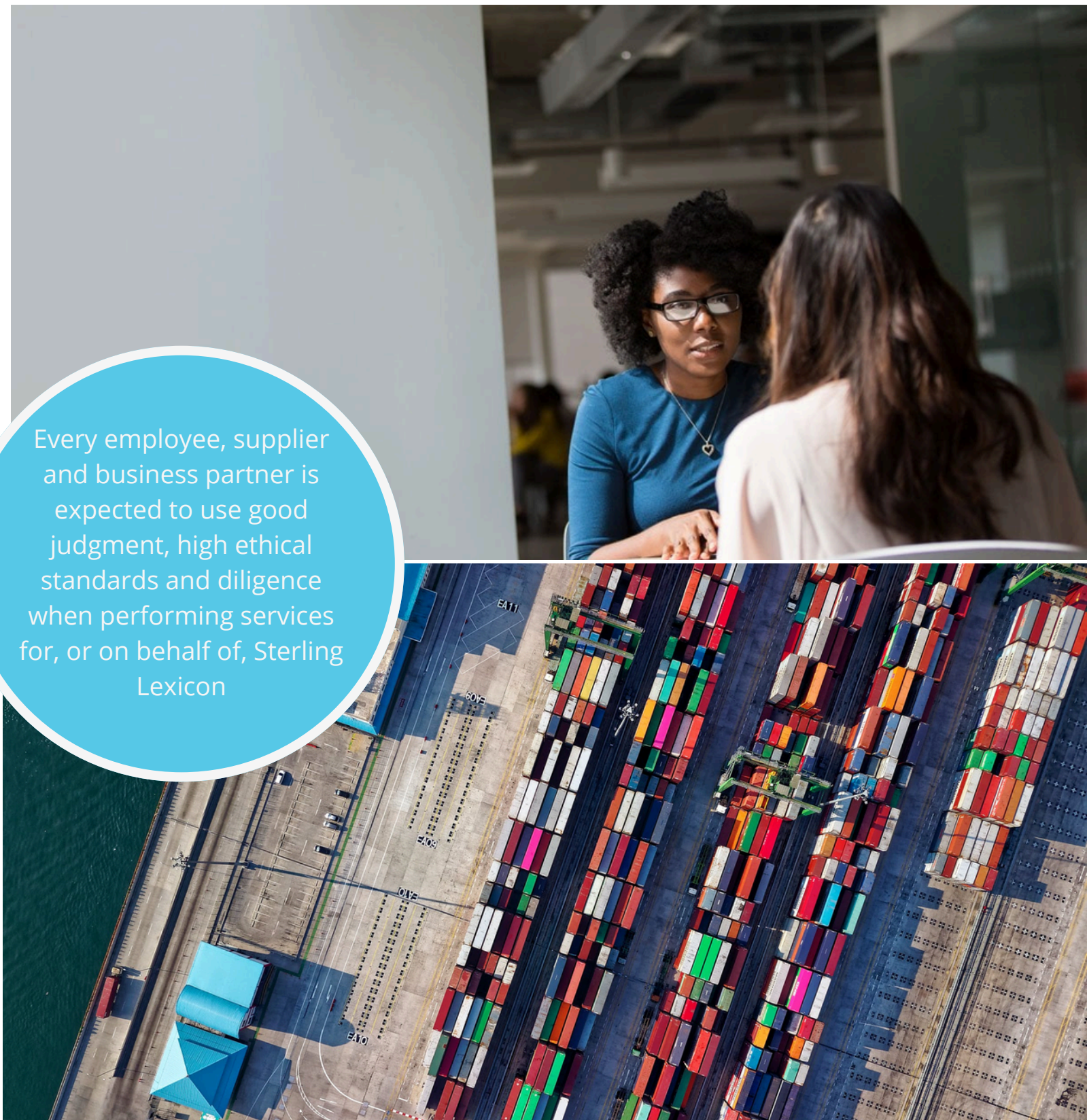
Global Trade Compliance

Sterling Lexicon's Global Trade Compliance Policy establishes mandatory guidelines and processes for all those employed or engaged with the Company to ensure compliance with applicable Global Trade laws, regulations and restrictions.

Each employee and contractor is expected to comply with all applicable laws, regulations and restrictions, such as trade embargoes, economic sanctions and export control.



Every employee, supplier and business partner is expected to use good judgment, high ethical standards and diligence when performing services for, or on behalf of, Sterling Lexicon



Whistleblowing

Compliance Helpline

Call Toll Free:
844-407-7265

Outside the United States, please use the following access codes prior to dialing the toll-free number:

<ul style="list-style-type: none"> • China North - 108-888 South - 10-811 • Germany - 0-800-225-5288 • India - 000-117 • Singapore SingTel - 800-011-1111 StarHub - 800-001-0001 • Spain - 900-99-0011 • Switzerland - 0-800-890011 • UK - 0-800-89-0011 	<ul style="list-style-type: none"> • France Hotels 1 - 0-800-99-1011 Hotels 2 - 0-800-99-1111 Hotels 3 - 0-800-99-1211 Hotels - Paris Only - 0-800-99-0111 Orange - 0-800-99-0011 Telecom Development - 0805-701-288
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Make a Report Online:
www.suddath.ethicspoint.com

View Policies and Procedures:
Go to suddath.sharepoint.com and look for the Employee Handbook.

Contact Directly:
Compliance Officer: +1 (904) 390-7120
Human Resources: +1 (904) 390-7100
Legal: +1 (904) 390-7100
Marketing: +1 (904) 390-7100

Sterling Lexicon utilises Navex Global for our 24/7, confidential compliance telephone and web-based hotline.

A reporting tool for employees, suppliers and clients to report a good faith concern regarding a violation of law or our Code of Conduct and Business Ethics.

Supply Chain Due Diligence

Sterling Lexicon requires all members of our supply chain to comply with all applicable laws and regulations, hold the relevant accreditation where possible and agree to implement innovative systems designed to minimise and reduce the negative impact of their operations on the environment.



Governance and Compliance

Sterling Lexicon utilise Jaggaer, a third party procurement platform, to vet all supplier's governance compliance processes



Ongoing Monitoring

Sterling Lexicon also utilises Navex Risk Rate, a third party programme built around the requirements of the FCPA, UK Bribery Act, OFAC and related laws and regulations



Code of Conduct

It is a mandatory requirement that all suppliers adhere to our Supplier Code of Conduct, confirming they will follow our ethical business requirements



Data Protection Agreement

It is a mandatory requirement that all suppliers sign our Data Protection Agreement, adhere to Sterling Lexicon's data protection and GDPR requirements



Today's business environment is complex, and our own industry has seen many changes in recent years. Throughout these transitions, one core Sterling Lexicon belief has remained constant: maintaining our good name and protecting our client's brands. We know this rests on each individual taking personal responsibility for their conduct.

Michael J. Brannigan
President & CEO, The Suddath Companies

Information Security

Sterling Lexicon ensures strict adherence to applicable global data protection laws, while keeping client and employee data secure. Sterling Lexicon's ISO 27001 accreditation is valid until 24th May 2024, certificate number 13093-ISMS-001.

Information security measures include:

- Remote Access: Client VPN along with Radius Two Factor Authentication is deployed. No users can connect from various remote locations. (Known threat GEO's are blocked on security appliances)
- Inter Office Connectivity: Site to Site VPN (3DES Encryption)
- Physical access to sensitive computer systems is restricted to appropriate IT staff by physical locks
- All access to systems is through by a confidential password, used in conjunction with a username

General Data Protection Regulation (GDPR)

Sterling Lexicon's data privacy processes meet all the current requirements of the GDPR, and we ensure we comply with the EU General Data Protection Regulation through regular internal and external audits. Sterling Lexicon's dedicated GDPR Compliance team has implemented processes to ensure all individuals are aware that their data is being processed and that they understand and know:

- The identity of the controller e.g. Sterling Lexicon
- The contact details of GDPR team
- The source of personal data (if not collected from data subject)
- The purposes of the processing as well as the legal basis for the processing
- The legitimate interests pursued by Sterling or by a third party
- The recipients or categories of recipients of the personal data, if any
- The fact that the controller intends to transfer personal data to a third country and the existence of adequacy conditions
- The period of time that the data will be stored
- The right to rectification, erasure, restriction, objection
- The right to withdraw consent at any time
- The right to lodge a complaint with a supervisory authority

To these ends, Sterling Lexicon has Consent Forms (Article 13 &14) setting out how data relating to individuals is used.

In addition, Sterling Lexicon requires all members of our supply chain to sign a Data Protection Agreement, which mandates they adhere to all the requirements of the GDPR and our own information and security policies. This is a mandatory requirement.



Sterling Lexicon's information security processes are accredited to ISO 27001. Sterling Lexicon's accreditation is valid until 24th May 2024, certificate number 13093-ISMS-001



We thank you for your continued support in our efforts to make a difference to the communities in which we live and work.

Sterling Relocation Limited

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+44 (0)208 841 7000

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