SOPHOS

Sophos ESG Data Points

Sophos is committed to ESG practices that can be objectively measured

Sophos Environmental, Social and Governance (ESG) Data Points

Sophos is committed to Environmental, Social, and Governance (ESG) practices in its operations that are responsible and sustainable, that can be objectively measured, and that materially advance the Sophos corporate strategy.

The Sophos ESG Policy maintains its commitment to ESG practices by:

- Cross-function collaboration that acknowledges individual Sophos Business
 Team ownership of and responsibility for specific ESG indicators;
- Regularly and transparently reporting each ESG indicator to benchmark and communicate ESG progress, measure emerging risks, adhere to new regulations worldwide, meet industry standards, and identify continuous improvements;
- Establishing internal controls that identify practical objectives, create sustainable corporate conduct, guard ESG data collection, align with Sophos' Code of Conduct, and bring about reliable governance practices;
- Declaring its commitment to the Responsible Business Alliance (RBA) Code of Conduct 8.0 (2025), as an industry standard "key to the Company's business strategy, which informs our decision making, and is core to our operations;"
- Continuously improving each ESG indicator that presents risks, does not meet regulatory requirements, falls below industry standards, or has not been properly developed;
- Working every day in a sustainable corporate culture that recruits, hires, and
 retains a diverse team and ensures inclusive hiring, parental leave, flexible time
 off, equitable pay, health and safety in the workplace, and key employee benefits;
- Creating Board oversight of Sophos ESG by reviewing Sophos' annual reporting on ESG Indicators. We place these practices at the core of Sophos operations.

Selected Sophos ESG Data - Environment

ESG INDICATOR	DEFINITION	SOPHOS
GHG Emissions Tracking	The Company tracks greenhouse gas emissions associated with its operations.	Yes
Environmental Initiatives to Reduce the Carbon Footprint	The Company has environmental initiatives to reduce the carbon footprint of its operations.	Yes
Datacenter Usage	The Company utilizes data centers that follow specific environmental characteristics.	Yes
Impacs on Biodiversity	The company does not have operations located in or near biodiversity sensitive areas that negatively affect those areas.	Yes
Emissions into Water	The Company measures and limits direct emissions into water of priority substances (e.g., nitrates, phosphates, pesticides) to protect waters against pollution.	Yes

Selected Sophos ESG Data - Social

ESG INDICATOR	DEFINITION	SOPHOS
Community Involvement	The Company provides opportunities for employees to engage in its communities through volunteer projects.	Yes
Family Leave Policy	The Company has a family medical leave policy that provides a minimum number of weeks FTEs receive paid primary caregiver leave.	Yes
Employee Wellness	The Company offers supplementary benefits to FTEs for Counseling, Health and Wellness, and related programs.	Yes
Health and Safety Policies	The Company has a Healthy & Safety Policy in place, including training about the policy and procedures.	Yes
Employee Training	Company employees are trained during the year, including Company policies and its code of conduct.	Yes
Non Discrimination/Non Harassment Policy	The Company has a non-discrimination policy and non- harassment policy with respect to gender, race, color, disability, sexual orientation, and age.	Yes
Employee Relations	The Company has an intake system to receive, process, and resolve grievances, and non-compliance, including anonymous complaints.	Yes

Selected Sophos ESG Data - Governance

ESG INDICATOR	DEFINITION	SOPHOS
ESG Policy	The Company has a Board-approved ESG Policy.	Yes
ESG Initiatives	The company has ESG initiatives in place.	Yes
ESG Performance Review	Senior Management and the Board review the Company's ESG performance.	Yes
ESG Resources	The company has dedicated resources to manage ESG.	Yes
Generative Artificial Intelligence (AI)	The company uses generative AI and has a Policy in place governing that use.	Yes
Ethics and Accountability	The Company has a designated Team with responsibility for managing compliance, ethics, and potential conflicts of interest.	Yes
Code of Ethics and Code of Conduct	The Company has a code of code of conduct.	Yes
Code of Conduct Training	The Company conducts employee training on its Code of Conduct, Trade, ethics, anti-corruption, Modern Slavery and whistleblowing.	Yes
Business Continuity	The Company has, within the last 12 months, assessed potential business continuity risks associated with sustainability related issues affecting operations.	Yes
GDPR Compliance	The company complies with the EU GDPR, has policies and procedures to ensure compliance, and applies GDPR requirements worldwide to data protection.	Yes
Supplier Code of Conduct	The company has a supplier code of conduct.	Yes
Government-Required Monitoring	The Company has a police and procedure that supports its ongoing monitoring of export controls based on product use and can locate, block, and remediate end users who are violating government-required monitoring.	Yes

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