

CORPORATE RESPONSIBILITY STATEMENT

Introduction

I am pleased to introduce this report, which provides an overview of our approach to corporate responsibility ("CR"), by discussing the governance, social and environmental issues we believe to be most relevant to our business and stakeholders, as well as providing a comprehensive update on activity throughout the year. Whilst current terminology usually refers to environmental, social and governance ("ESG"), we have purposefully reordered these indicators on the basis of their relative materiality to our business. At GBG, our Board has overall responsibility of CR, with developments and initiatives being led by myself, supported by the Executive Team. CR practices are deeply embedded in our day-to-day activities and are integral to our business model and strategy.

We passionately believe in the fundamental importance of effectively managing governance, social and environmental risks and harnessing opportunities and are committed to continuous improvement of CR practices. In order to provide our stakeholders with sufficient levels of transparency on these topics, we are always looking at ways of optimising our reporting and I am pleased to provide a higher level of detail in this report. We are, however, mindful of the fact that this is an ongoing process. We are cognisant of the benefits of using measurable indicators and targets in reporting on our CR activities and are carefully considering the most appropriate metrics in the context of our strategy, business model and most material issues.

Recognising the importance of CR to our business, we have created a global set of key principles and policies that act as a framework to enable a consistent approach for GBG to fulfil our purpose to: establish trust between businesses and their customers; to work and act responsibly; empower, prioritise and protect our people; create broader societal value and protect the environment. We are acutely aware of the different markets and contexts in which we operate and, therefore, have taken the decision to decentralise some elements of CR decision making to local teams to enable maximum impact and to facilitate greater agility against the backdrop of shifting requirements in global and local markets. This enables us to act nimbly and adjust to changing policies, laws and practices, whilst maintaining a resilience at Group-level which is underpinned by our overarching approach.

The policies relating to our framework have been updated and expanded during the year to keep pace with changing developments and initiatives. Revisions to the policies also take into account feedback received from our team members, investors, regulators and our customers.

As detailed elsewhere in this Annual Report, our primary focus during the Covid-19 pandemic has been on the health and well-being of our team, who look after our customers who in turn support our business. At an early stage during the pandemic we made a range of decisions to protect our people and to look after our customers and other stakeholders in order to secure the long-term prospects and value of the business. GBG has been quick to adapt to the changing working environment with our team members working effectively remotely and with a strong focus on employee engagement. Managers have been encouraged to keep in regular touch with their teams by video and conference calls, together with using our Group intranet to provide support information and to share experiences between the regions.

A key factor in our ability to operate our Group business continuity plan effectively has been our team members' ability to work remotely and flexibly as well as the cohesiveness of our global teams – these have been areas of specific focus and development by GBG prior to the pandemic. Our continued strong engagement with customers, suppliers and investors has also led to increased levels of confidence amongst our stakeholders, reinforcing their belief in GBG's ability to operate with strength and integrity during the pandemic and to emerge from this crisis with the ability to continue to execute on our long-term growth strategy.

Governance

As a Group, and more specifically a Board, we believe that good corporate governance is essential for building a successful and sustainable business in the long-term interests of all GBG stakeholders. It is our view that trust, responsibility and ethics are the cornerstones of an effective organisation and we actively promote a culture of honesty, integrity, trust, and respect across the business. We look to uphold human rights, encourage diversity and equality, and promote good governance. All of GBG's team members are expected to operate in a responsible manner and key elements of the procedures we have in place to engender trust and facilitate ethical practices are covered in this statement. These are all underpinned by our Code of Conduct, which is publicised and promoted to all team members, with access and training provided on the Group intranet, Be/developed.

Corporate Governance

The Board ensures that the highest standards of corporate governance are practiced throughout the Group and that it conducts itself in the best interests of the Group's many stakeholders. In September 2018, we adopted the 2018 Quoted Companies Alliance Corporate Governance Code (the 'QCA Code') as the basis of our governance framework and we have complied in full with the QCA Code. A comprehensive account of our compliance and corporate governance activities is detailed in our Corporate Governance Statement on pages 43 to 47.

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Ethical Practices

The Board takes ultimate responsibility for ethical issues throughout the Group and seeks to lead by example. As a Group, we are committed to continuously improving our practices to ensure that slavery and human trafficking are not taking place in any part of our business or supply chain. We expect the same commitment from our suppliers, contractors and business partners and have adopted a policy on Modern Slavery, setting out the standards we expect from our stakeholders, that is reviewed each year. A copy of our Modern Slavery Statement is regularly shared with our team members and is available at www.gbgplc.com. All new starters are required to review and confirm their understanding of our Modern Slavery statement as part of their online induction process.

It is our policy to conduct business in an honest and ethical manner. We take a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly and with integrity in all our business dealings and relationships wherever we operate and implementing and enforcing effective systems to counter bribery. Through our Anti Corruption and Bribery Policy we provide guidance on acceptable behaviour, give team members examples of what would constitute bribery and encourage the reporting of any suspected bribery activities through our independent whistleblowing channel.

As a public company, with shares traded on the London Stock Exchange, a diverse range of institutions and individuals choose to invest in GBG and they expect to do so with the confidence that others are not trading in our shares with inside information that is not yet publicly available, otherwise known as insider trading. The Group operates a 'Dealing Code' to ensure that Directors and team members do not abuse and do not place themselves under suspicion of abusing inside information and that they comply with their obligations under the Market Abuse Regulations.

We have adopted a policy to uphold all laws relevant to countering tax evasion and prevent persons associated with GBG and its subsidiary companies from engaging in the criminal facilitation of tax evasion in the UK or in a foreign country. The policy outlines the procedure that must be followed should a team member suspect a breach of the policy.

We do not tolerate behaviour which contravenes our Code of Conduct, or which could result in reputational damage to the business. We encourage team members to raise concerns without fear of reprisals and provide clear reporting lines for instances of fraud, bribery, bullying, unfair or unethical treatment and unsafe working practices. We have an externally-provided, 24/7 whistleblowing hotline to enable team members to report in complete confidence from anywhere in the world any unethical practices or concerns. The hotline provides access to local operators who provide a wider scope of support in local languages of those countries in which our teams operate. The whistleblowing procedure, which is communicated to all team members via the intranet to ensure that it is widely available and properly communicated, contains a clear structure to process any reported incidents and is overseen by the Audit Committee, with the Chair holding ultimate responsibility. No issues were reported during the year.

Data Privacy & IT Security

Our business model is built upon our ability to engender trust with our data partners, the businesses using our products and end consumers, therefore we consider our duty to be a responsible data custodian as one of our most material issues and central to our CR strategy. As our highest governing body, the Board has oversight of this responsibility.

We recognise our responsibility to think carefully about how data is processed and used in order to uphold a high standard of data ethics within the business and to enable the same amongst our customers. We prioritise ethical data practices and have several controls, systems and approaches to ensure confidence in our business, including:

- Evidence of provenance when data sourcing
- Ability to demonstrate how and where data is being processed and that this is conducted on a lawful basis
- Fair and transparent approach to all algorithms and technology

In our view, privacy is a fundamental human right and, therefore, we acknowledge our responsibility to safeguard data security at every step of the supply chain – from our data providers to our customers and their end-consumers. Our overarching aim is to protect both information and systems from malicious or accidental data loss, damage or abuse.

Acting as a custodian of customer identity data for some of the largest organisations in the world, GBG aims to set the highest standards of information security and in so doing has developed an Information Security Management System ('ISMS') to meet the requirements of the ISO27001 standard. The ISMS aims to safeguard our systems and networks from unauthorised access, compromise and/or disclosure of data to protect the confidentiality, integrity and availability of information resources and assets held by GBG and its customers.

A number of penetration tests are conducted across GBG products, including the completion of a Global Threat Assessment (RedTeam) exercise across the entire business. Vulnerability scanning takes place at least monthly with all cloud environments, in addition to being subjected to a continuous security test ('CST') service. GBG has invested in and implemented technologies such as DarkTrace and Exabeam – both of which use machine learning and user behaviour analytics to identify any abnormal behaviour on our networks.

Internal and external audits and risk assessments are conducted as part of GBG's policy of continuous improvement and also to providing assurance of the currency and effectiveness of its information security policies, processes, systems and networks.

We are committed to collecting, processing and analysing data compliantly, in line with data privacy legislation and, as a global company, this covers many jurisdictions and laws, such as the General Data Protection Regulation ('GDPR') in the EU and California Consumer Privacy Act ('CCPA') in North America. We work closely with our data partners to ensure that the data we source is compliant with applicable legislation. We have an extensive framework of policies and procedures to follow, which are all available to GBG team members through our intranet, to ensure we always do the right thing for our customers and individuals. These include our Data Protection Policy, which is designed to ensure that we address the broad range of risks to our corporate, supplier and customer information. All such procedures are housed within an overarching framework called 'be/compliant', with four key principles, which are continuously promoted to ensure we interact with data appropriately:

- "We will ensure we know what we can do with data and if unsure, we will ask"
- "We will be clear about how we are going to use data"
- "We will ensure we protect the data we hold/process"
- "We will ensure compliance both individually and as a team"

GBG is committed to ensuring that all team members are fully aware of their responsibilities in relation to data protection and security. Mandatory training modules are in place and all team members can access these via be/developed. These modules are reviewed in line with any legislative changes or on an annual basis (whichever is soonest).

With a data network spanning over 150 partners worldwide, we are acutely aware of the onus on us to source data in a responsible manner and through our data sourcing and privacy teams endeavour to ensure that we can maintain our high credentials in this area through:

- carrying out supplier due diligence before data is used and on-boarded
- ongoing monitoring of supplier credentials to ensure continued compliance with relevant laws and regulations
- maintaining effective account management with suppliers and reviews of the currency and accuracy of data sources

In support of these security and data activities, GBG is a member of the International Association of Privacy Professionals ('IAPP') and we have implemented the One Trust Privacy Management Software to further support our global privacy management obligations.

Further details relating to assessment and mitigation actions for the risks associated with data privacy and information security are detailed in the Principal Risks and Uncertainties Report on pages 24 to 32.

Social

Our team members are central to the long-term success of GBG and we look to attract and retain 'the best and most engaged people'. We prioritise effective employee engagement as well as investing in the development of our people, and we aim to cultivate a strong, committed, and innovative culture within a diverse and inclusive workforce. We are also continually considering ways of maximising positive societal contributions of both our own business and that of our customers.

Equality & Diversity

We strongly believe that diversity throughout the Group is a driver of success and recognise it has significant benefits. By focussing on diversity, we believe GBG can be a more effective, successful and profitable company as well as continuing to be considered a great place to work by our team members.

Diversity provides us access to a greater range of talent, not just the talent that belongs to a particular world-view or ethnicity or some other restricting definition. Our employment, training and career development policies and practices promote equality of opportunity regardless of gender, sexual orientation, age, marital status, education, disability, race, religion or other beliefs and ethnic or national origin. We aim to encourage a culture in which all team members have the opportunity to develop as fully as possible in accordance with their individual abilities and the needs of the Group and continue to look at ways that we broaden diversity throughout the Group.

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We have taken a number of proactive steps to promote diversity and equality within GBG under our Group-wide initiative, *be/yourself*. Launched two years ago this initiative supports a range of activities in our focus areas of:

- Nationality, race, religion and location
- Sexual identities, inclusive of LGBT+ definitions and gender fluidity
- Experience and age
- Gender and addressing imbalances in our business, our industry and our communities

We have a dedicated manager appointed as Head of Diversity & Inclusion who is supported by a team of volunteers (*be/yourself* champions) from around the business to support every team member to feel comfortable in being themselves - meaning that everyone is treated as equal and with respect. Through *be/yourself*, it is our objective to support and promote an inclusive and diverse culture at GBG through a range of activities to seek views, raise awareness and provide opportunities for learning and sharing knowledge. Activities during the year have included promoting and celebrating: International Women's Day, various International Pride events, and diversity/women in tech.

In line with the UK Government requirement, in March 2020 we published our third Gender Pay Gap Report, available on our website at www.gbgplc.com/about-us/gender-pay-report. Since sharing the reports with our team and reflecting our data in previous years, we have seen an increase in interest and conversations around gender, remuneration, opportunity and what actions we are undertaking to address these areas. We actively encourage engagement on these topics to ensure we understand our team member's sentiments, gain insight into areas they believe we should concentrate on and share our plans and activities.

Whilst we have adopted a more targeted focus on this issue, we have yet to see a significant improvement in our overall statistics. This reinforces our initial views that this process represents a continual journey of improvements and that we must consistently work to bring about the reforms we seek, whilst recognising this is not achievable instantaneously. Presently women comprise 36% of our total workforce and 43% of our Board of Directors (37% and 33% respectively for 2019).

As a global business we aim to continue to focus on identifying candidates who can support our ambition to improve the overall diversity of the GBG team.

Communications with team members

With over 1,050 team members (2019: 985) in 16 countries around the world (the vast majority of whom are in permanent positions), we believe in the importance of successful internal communications and strongly feel that all our team members should have a voice within the Group. By focusing on and listening to employee feedback, facilitated by twice yearly employee engagement surveys, we aim to be able to respond to any issues which might impact engagement and/or employee satisfaction before any problems emerge and have found this to be a very successful programme to date. This year, our employee engagement survey recorded its best level of team member engagement, improving on last year's high score and with a higher response rate. We continue to have over 90% of the global team who would recommend GBG as a great place to work.

We communicate with our team members on a regular basis, keeping them informed of business performance, initiatives, and developments. This is achieved through annual workshop-style events at our key locations and live monthly CEO webinars which due to Covid-19, are now held on a weekly basis. In addition to this, our business units provide high-level updates, briefings and webinars.

We utilise an intranet platform called 'be/connected' which has been active since August 2017 and is now the central hub for Group and customer news, as well as for internal social networking. On average, it is visited by 50% of team members daily and 90% of the business monthly. We have been increasing the focus on live, in-person panels and events, including CEO roundtables across multiple locations, special Q&A panels to mark specific occasions (such as International Women's Day and Pride), thereby providing team members with the chance to engage with senior management and thought leaders in a more intimate setting.

Demonstrating its significance to the Group, successful employee engagement is used as a metric to reward senior management within the business.

Engagement with team members and Covid-19

We recognise the importance for our team members to feel that they work at a business which really values them. By maintaining integrity with a strong culture, we believe we have been able to demonstrate to our team members how much GBG genuinely cares for them and is dedicated to investing in them. With the onset of the Covid-19 pandemic and with our entire global team working from home, we quickly implemented a number of changes that have been incredibly valuable in ensuring that we can continue to communicate effectively with our team members and maintain our culture of inclusivity and engagement.

We recognise that in times like this, there is no such thing as superfluous internal communications, particularly as each engagement initiative is unlikely to receive full take up. By maintaining regular, transparent communications with our team members we have sought to ensure strong engagement throughout the crisis. Initiatives and actions during this time have included:

- a weekly CEO webinar update to all team members with a live Q&A session to respond to questions and issues in real-time;
- managers have been proactive in keeping in regular touch with their teams and team members by video and telephone calls; establishing an area on our Group intranet to provide specific Covid-19 related support information and guidance documents and to enable our team members to share experiences between the regions; and
- We have taken steps to highlight access to what resources are available to support our team members who may be struggling.

Team member training and development

Working in a highly regulated sector, training and development is of vital importance to the successful running of our business. We also consider it an important way of delivering value to and inspiring our team members, advancing our strategy and maintaining a great place to work. We prioritise employee training and ensure that all our people have the support required to not only maintain compliance but also achieve best practice wherever possible.

GBG has an internal training platform, 'be/developed', which provides all our team members around the world with a large variety of learning content ranging from data privacy and information security training, employee development and management best practice. This year over 19,873 hours has been spent learning by our team members through 'be/developed' (2019: 17,498 hours).

GBG also supports professional development of team members to achieve recognised and accredited qualifications in areas across the business including information technology, marketing, legal and finance – helping to develop the careers and prospects of our current and future specialists.

Recognition and incentives

We have continued to promote the Group Vision Objectives and Strategies ('VOS') Awards throughout the year. The awards not only link to the Group values of Quality, Innovation, Excellence, Trust and Respect but are also attributed to the five key segments of the Group's VOS – People, Products, Customer, Technology and Brand. The VOS Awards encourage individuals within the business to nominate their fellow team members deserving recognition, with the winners announced every quarter. Quarterly winners are then further recognised annually when a financial award is made to the overall winner for the year.

In addition, we operate an annual sales incentive initiative to recognise members of our sales teams who have performed exceptionally throughout the financial year, along with other supporting, non-sales members of our team. Other areas of the business have developed their own systems of recognition, including the 'Customer Star' and 'Technology Star' awards and smaller scale regional or business unit specific sales initiatives.

Everyone at GBG is also given the opportunity to share in the Group's performance through GBG's Save-As-You-Earn ('SAYE') Share Option Scheme (the 'Scheme'). The scheme is open to all team members (except for China where there are challenges in respect of personal share ownership) which gives team members the option to apply to save up to £250 (or foreign currency equivalent) per month for a period of three or five years and to purchase shares in GBG at a discounted rate (except in territories where offering shares at discount is prohibited).

We had a fantastic response to the Scheme launched in 2019 with nearly half of team members globally taking up the offer. During the year, the Remuneration Committee of the Board agreed that GBG would launch an international SAYE annually, instead of every two years as currently operated, and we are pleased to report that, despite the Covid-19 pandemic, we will still be launching the 2020 SAYE scheme later this year alongside the maturity of two running Schemes that were launched in 2015 and 2017.

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Health & safety and well-being

We are committed to the effective management of health and safety and to protecting the well-being of our team members. We have a Health and Safety Policy, which details key standards, systems and procedures and we provide training and guidance to all employees and especially those with specific duties and responsibilities such as fire wardens and first aiders. We also supplement our activities with sharing best practice and guidance updates with team members.

All accidents and near misses, whether they result in absence from work or not, are reported with remedial action identified and implemented to prevent reoccurrence. There have been no reportable accidents within the last year, only minor incidents. Our external health and safety consultants provide GBG with annual audits and guides us on all health and safety matters.

We also provide an Employee Assistance Programme ("EAP") for all team members, irrespective of location. The EAP grants team members access to confidential help with issues such as health, financial support, family matters or other problems which may lead to worry and anxiety. This is available to everyone in the business via a support line which is open 24 hours a day, 7 days a week, 365 days a year.

Across GBG, we have 'Pulse Teams' which promote and support any local initiatives and events that are designed to improve the employee experience at GBG. This includes health and well-being events to promote healthier lifestyles and practices and mental health awareness.

As detailed above, we acted decisively in response to the outbreak of Covid-19 to prioritise our team members' safety and well-being. As has been the case in China and Malaysia, any return to our office locations is carefully considered in respect of the best interests of our team members. Risks are assessed in line with local guidance and best practice together with ensuring that team members receive detailed information and briefings before they return to the office so they are aware of the processes and procedures.

Working environments

We continue to invest in improving the working environment for our teams, creating innovative spaces which inspire our people to collaborate more readily and increase personal efficiency. We listen to our people and endeavour to incorporate their needs wherever practical. The Group has a flexible working policy to facilitate an optimal work/life balance and support those with families and other needs or commitments outside of work; we also encourage working from home where possible. In the past year we have moved to new workspaces in Canberra and New York and we continue to invest in technologies which ensure that our team members can work just as productively regardless of where they are.

Society

We believe it is our ability to establish trust between businesses and their customers that places us at the heart of the global digital economy.

Our customers need innovative digital solutions to grow, reduce online fraud and meet increasingly stringent compliance regulations. GBG offers practical solutions and tools to enable organisations to engender trust with their customers, help them to mitigate ethical risk within their own business and keep principled practices at the heart of their business models. We take our responsibilities seriously in terms of sourcing, securing and protecting data as well as ensuring its ethical usage. Beyond the clear ethical benefits to our customers of using our products and services, many have very specific, inherent societal benefits including providing criminal records checks to organisations who need to vet those working with vulnerable people, ensuring that age restricted products and services are not offered to children and providing data tools to police forces to assist in the prevention and detection of crime.

Community support

As a worldwide business, we apply a global and strategic approach to community support and look to ensure a consistent and meaningful contribution to a specific societal issue on an annual basis; in 2020, we chose children. Employee contribution is central to our community support programmes and we encourage volunteering and personal involvement in causes that matter to our workforce. This not only advances our sustainability goals but also contributes to our wider strategic objectives as we believe that volunteering has the capacity to engender cooperation and engagement, as well as encouraging a different way of thinking and working together.

In addition to this, we have invested time in looking at longer-term schemes to help support communities around the world. Some examples include science, technology, engineering and mathematics ('STEM') in the UK, beach cleaning and soup kitchen volunteering in the United States, volunteering at shelters and youth support centres in Singapore and Malaysia.

Environment

We are conscious of our duty to use resources responsibly and to minimise any environmental impacts of our business activities. This is not only the right thing to do but has also been identified as an issue that our employees care about.

As an office-based operator using leased facilities, our environmental impact is relatively low compared with other sectors. However, we believe that it is our ability to enable our customers to make improvements to their services that have an environmentally advantageous impact (as well as operational and financial benefits) which arguably represents our capacity to make the most impact on a global scale.

We comply with all relevant environmental legislation and have clear objectives to reduce energy consumption and waste production within our office environments. In the UK, an assessment (carried out by an external consultant) was submitted by the Company to the Environment Agency under the Energy Savings Opportunity Scheme ('ESOS'), which confirmed that GBG is compliant with the standard in the UK, with only four minor recommendations (all of which have been addressed).

The scope of the ESOS assessment was designed to ensure GBG's compliance with the legislation by:

- calculating and presenting GBG's energy consumption in the UK for the period 1 June 2018 to 31 May 2019;
- identifying the building energy consumption and grey fleet use in the areas of significant consumption;
- considering available routes to ESOS compliance; and
- presenting the results of ESOS compliant energy audits for the areas of significant energy consumption.

Our ESOS report calculated that emissions of 494 tonnes of CO₂ (2,006,498 kWh) were in respect of direct emissions from combustion of fuel (diesel and petrol) and operations of facilities. The external consultants calculated the levels using billing information for our properties and details of expenses from team members claiming mileage for business travel. The exercise identified a small number of energy savings opportunities. We adhere to the recommendations of this scheme and continue to drive further improvements in all of our locations, where possible. Further details of this assessment are included on our website.

As a global business, travel is required for certain team members, however, we will continue to actively promote video conferencing as an alternative and aim to reduce unnecessary travel wherever possible. In order to conserve energy, we have installed light sensors as well as air conditioning and heating timers in our offices. We currently have centralised printing in each office and encourage minimal printing with a recommendation to move to paperless wherever possible.

We take our responsibility to use resources in a responsible manner seriously and have a 'reduce, reuse and recycle' policy. We actively promote recycling of technology and office consumables by providing recycling points in each of our offices. Although we do not use a materially large amount of water, given the office-based nature of our business, we look to limit its usage through the use of electrical sensors.

The full extent of changes to office working and business travel that will arise as a result of the Covid-19 are not yet certain. We will seek to review and update our initiatives and plans relating to our environmental impact when there is more clarity and visibility on how these can be implemented and measured effectively.

Chris Clark
Chief Executive Officer