

**SUSTAINABILITY
AND ESG
REPORT 2025
WIP**



Slide 1

VJ1 Would use the proper white logo here. Happy to send if needed but should be able to download from the brand portal here - <https://brand.optimizely.com/document/82>

Of course will be rebranded later :)

Victoria Johnson, 2026-03-25T21:11:30.146

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About this report

This sustainability report encompasses the Group report, Epsilon Group New Holdings Ltd and its subsidiaries (collectively referred to as “Optimizely” or “the Group”). It builds on the experience we have gained in the last few years and shows our efforts in complying with international sustainability reporting standards and frameworks. It has been created to share our commitment and our ambition to become a more sustainable company.

In this sustainability report, we have used the guidance of the European Sustainability Reporting Standards (ESRS) and the EU Directive on Corporate Sustainability Reporting (CSRD) combined with the materiality assessment we have conducted to determine what to include and to define our Key Performance Indicators (KPIs).

The disclosures are informed by the Group’s double materiality assessment and reflect both: **Impact materiality**, addressing the Group’s actual and potential impacts on society and the environment; and **Financial materiality**, addressing sustainability-related risks and opportunities that may affect the Group’s financial performance, position, and long-term enterprise value.

This report builds on prior reporting cycles and reflects enhanced governance integration, improved data controls, and strengthened alignment with ESRS disclosure requirements. Where data availability remains under development, methodologies and improvement plans are disclosed transparently. Optimizely remains committed to progressively improving the completeness, accuracy, and comparability of sustainability information in future reporting cycles.

Optimizely falls within the scope of Wave 2 CSRD reporting. Under the EU’s stop-the-clock directive adopted in 2025, Wave 2 companies have received a two-year deferral, with mandatory reporting obligations now applying from financial year 2027, with the first mandatory report due in 2028. This report has been prepared voluntarily ahead of that obligation, demonstrating Optimizely’s commitment to sustainability transparency and early alignment with ESRS requirements. Optimizely is monitoring the EU Omnibus Simplification Package, which proposes to narrow mandatory CSRD scope to companies with more than 1,000 employees and to simplify certain ESRS disclosure requirements. The simplified ESRS Delegated Act is expected by September 2026. Optimizely will confirm its mandatory reporting scope and adapt its disclosure approach in line with finalised standards ahead of the FY2027 reporting cycle.

Certain disclosures — including workforce representation data — reflect EU regulatory obligations. Optimizely is an ‘equal opportunity’ employer. All hiring, promotion, compensation, and employment decisions are made on the basis of merit, qualifications, skills, and business need, in compliance with applicable employment laws. Disclosed workplace data herein reflects the reportable composition of Optimizely’s workforce as measured at a point in time. Any benchmarks or forward-looking targets reflect Optimizely’s commitment to continue building appropriate workplace environments for all employees, but those benchmarks and targets do not constitute quotas, nor the basis of hiring or termination decisions.

Slide 2

AM1 [@Christopher Bayliss] -Scope of the report Jurisdiction Disclaimer Page as the cornerstone for Title VII of the Civil Rights Act of 1964. If you can review, that would be great.

Adelina Morina, 2026-04-16T18:27:56.685

Strategy and targets



“It’s all about innovation and execution”

VJ1

- Alex Atzberger, CEO

Our Values

“We believe that intelligent technology must be deployed responsibly. Innovation without governance erodes trust; innovation with integrity strengthens it. As we expand our AI capabilities, we remain guided by principles of transparency, fairness, privacy protection, and long-term value creation.” - Alex Atzberger, CEO

VJ3

Our strategy

In 2025, we evolved our AI strategy beyond feature-level enhancements and committed to building the leading Agentic AI platform for marketing. This strategy positions Optimizely at the forefront of intelligent digital orchestration, enabling customers to operate at greater speed, scale, and precision.

In parallel, we are deploying AI internally to enhance operational efficiency, improve emissions data modelling, and strengthen sustainability analytics. AI is not only transforming our product — it is transforming how we operate.

Our goals

Optimizely’s transition plan for climate change mitigation is aligned with the goal of limiting warming to 1.5°C. We have set a long-term ambition to achieve Net Zero greenhouse gas emissions across our Scope 1 and 2 operations by 2050. Given that 98% of our total emissions arise from Scope 3 value chain sources — primarily cloud infrastructure — we have adopted an intensity-based target to reduce Scope 3 emissions by 30% per \$1,000 revenue by 2030, using 2024 as the baseline year. We are strengthening responsible AI governance frameworks and embedding sustainability metrics into enterprise reporting systems to ensure measurable progress

Our sustainability approach - Business, people and planet

Optimizely integrates sustainability into its corporate strategy and enterprise risk management framework. As a global Digital Experience Platform (DXP) provider, the Group recognizes that digital infrastructure influences environmental efficiency, data governance standards, digital accessibility, and societal trust. To this end, our sustainability approach focuses on three core

pillars: **business, people** and the **planet**.

These pillars guide sustainability governance, risk identification, and long-term value creation.

Business	People and planet
<p>Leadership in DXP market – Responsible Digital Innovation</p> <ul style="list-style-type: none"> • Embedding ethical AI, cybersecurity resilience • Accessibility standards, and privacy-by-design architecture into product development and operational governance. 	<p>Positive impacts</p>
<p>Retaining portfolio of customers and explore new markets</p> <ul style="list-style-type: none"> • Customer retention for products and sustainable businesses • Explore opportunities to expand to growing market 	<p>9 INDUSTRY, INNOVATION AND INFRASTRUCTURE Technological innovations in DXP enhance user experience and embrace digital transformation.</p> <p>8 DECENT WORK AND ECONOMIC GROWTH Optimizely foster growth for businesses in multi-industries and create healthy environment for the labor force.</p> <p>13 CLIMATE ACTION Investment in R&D increases efficiency, reduces resource consumption and minimize waste</p>

Business – Responsible Digital Innovation

The Business pillar focuses on responsible digital innovation, including ethical AI governance, privacy-by-design architecture, cybersecurity resilience, and accessibility integration within product development lifecycles.

Optimizely’s innovation strategy focuses on delivering high-performance digital experiences while reducing infrastructure intensity and enhancing data governance standards.

Key priorities include:

- Ethical AI deployment and bias mitigation frameworks
- Privacy-by-design product architecture
- Cybersecurity resilience across all product layers
- Cloud optimization and data consolidation initiatives

Investment in R&D supports improved software efficiency, which can indirectly reduce energy intensity across client deployments.

People – Human Capital and Leadership Resilience

The People pillar addresses workforce engagement, leadership development, inclusion & belonging, and ethical labour standards across both direct operations and the value chain.

Our people are at the heart of our business. Human capital is central to long-term competitiveness. Optimizely invests in leadership development, talent development and capability building, technical upskilling, and employee wellbeing to support innovation continuity and operational stability. Workforce representation metrics are monitored annually to support transparency and inform inclusive talent management practices.

Planet – Environmental Stewardship Across the Value Chain

The Planet pillar reflects the Group’s responsibility to manage indirect environmental impacts, particularly those arising from cloud infrastructure, purchased services, and IT lifecycle management.

Environmental impacts primarily arise through upstream suppliers. The Group mitigates this exposure by:

- Consolidating physical data centres
- Transitioning to hyperscale cloud providers with verified decarbonization roadmaps
- Enhancing supplier ESG screening processes
- Strengthening energy and waste efficiency across offices

Sustainability performance is tracked through defined KPIs and reported annually.

LT6

Slide 3

- VJ1** Would make sure all fonts are uniform throughout
Victoria Johnson, 2026-03-25T21:15:18.522
- VJ2** Also getting the weird cross out/blurry words here too
Victoria Johnson, 2026-03-25T21:16:46.741
- VJ3** Did Alex approve this quote already or do you need help there?
Victoria Johnson, 2026-03-25T21:18:06.464
- AM3 0** [@Victoria Johnson] - no we have not shared yet. Took from what I could find on public postings from Alex, re-purposed but need to get this approved. If you could help then that would be great.
Adelina Morina, 2026-03-26T19:26:06.105
- VJ4** can't update decarbonisation to decarbonization without letters randomly deleting
Victoria Johnson, 2026-03-25T22:14:17.785
- AM4 0** All changed from decarbonisation to decarbonization
Adelina Morina, 2026-03-31T10:54:03.211
- LT5** We should take out diversity representation. We don't do this.
Laura Thiele, 2026-04-11T15:59:49.336
- AM5 0** All edited and removed diversity wording
Adelina Morina, 2026-04-27T17:07:15.980
- LT6** We do not have diversity targets. They were removed.
Laura Thiele, 2026-04-11T16:00:23.704
- AM6 0** Everything reworded carefully, no targets on protected characteristics
Adelina Morina, 2026-04-27T17:08:44.784
- CB7** edits on page 3 approved.
Christopher Bayliss, 2026-04-27T16:40:05.522

Our sustainability approach – Tracking and Reporting our progress

Sustainability oversight is integrated into Optimizely's governance framework. The ESG Steering Committee coordinates sustainability and governance initiatives across business functions and reports to executive leadership. The Board of Directors retains ultimate oversight of material risks, including sustainability-related risks.

Sustainability considerations are embedded within enterprise

risk management processes and strategic planning cycles. Performance indicators are reviewed periodically, and governance controls are progressively strengthened to align with evolving ESRS requirements.

Our progress will be evaluated through key performance indicators (KPIs) across three areas Environment, Social and Governance.

Performance on Strategy and Targets

Sustainability performance is monitored through defined environmental, social, and governance (ESG) indicators aligned with the company's strategic priorities and material topics. Oversight is provided by the ESG Steering Committee, which coordinates sustainability initiatives across business functions and supports integration of sustainability considerations into enterprise risk management and operational decision-making processes. The committee reviews performance data periodically and provides input to senior management to support governance oversight and accountability. The Board of Directors reviews sustainability performance annually and retains oversight of progress against the Group's material targets. While measurable progress has been achieved in several areas, the Group recognises that further work is required to enhance data maturity, formalize transition pathways, and strengthen supplier engagement mechanisms.

Environment

Target: Optimizely is committed to achieving Net Zero greenhouse gas (GHG) emissions across Scope 1 and 2 by 2050. As part of this commitment, we have set an intensity-based interim target to reduce Scope 3 emissions by 30% per \$1,000 revenue by 2030, using 2024 as the baseline year, given that 98% of total emissions arise from Scope 3 value chain sources.

Performance: During 2025, the Group made measurable progress against several sustainability objectives. Emissions during the reporting period primarily reflects enhanced

measurement accuracy and expanded reporting coverage rather than underlying operational expansion alone. The Group initiated consolidation of legacy data centres and progressed migration to hyperscale cloud providers with established decarbonization roadmaps. In relation to environmental performance, Scope 3 greenhouse gas emissions decreased compared with 2024. This reduction reflects a combination of operational improvements and enhanced data accuracy, including strengthened integration with key strategic suppliers.

By 2025, the Group implemented automated emissions data reporting processes with major cloud infrastructure partners, including Google Cloud and Amazon Web Services, Microsoft Azure. The Group primarily applied a spend-based methodology to calculate Scope 3 emissions for cloud. Supplier-specific emissions data (from key cloud and software providers) was available for around 70% of the total financial year and was reviewed against spend-based methodology to enhance understanding of emissions drivers and support future improvements in measurement accuracy.

This represents a significant improvement in emissions measurement maturity, enabling more accurate tracking of value chain impacts and supporting improved decision-making related to infrastructure efficiency. However, science-based target validation has not yet been formalized, and absolute emissions reductions have not yet been achieved. Addressing these gaps remains a priority for the forthcoming reporting cycle.

	Goals and performance targets	Base year	Target year	2025 Performance
Environmental	Climate change mitigation Net Zero GHG emissions across scope 1, 2	2023	2050	Research on the development of SBTi in progress
	 Emission reduction Scope 3 Measure, monitor and reduce Scope 3 emissions intensity (Cloud infrastructure, Data centers) by 30% by 2030, and 50% by 2050	2023	2050	
	Energy performance 100% renewable electricity by 2035 across key global offices	2024	2035	On track
	Supply chain management 70% of key suppliers to meet sustainability criteria by 2035	2024	2035	In progress
	 Health and safety 0 work accident, 0 lost workday incidents Great place to work in key global offices	2024	2030	0 work-related accident Great Place to Work in Vietnam, Bangladesh, UK
Social	 Inclusion & Belonging Tracking workforce representation across all levels against our long-term inclusion benchmark, through talent development, progression, and equal opportunity practices.*	2020	2030	32% women employees, total* 50% women, executives* 39% women, line managers* AM7
	 Supporting fair employment, safe and inclusive workplaces, and workforce capability development — including in AI, digital skills, and responsible technology use — across all global operations. LT5	2025	2030	In progress
Governance	 Ethics and compliance Strengthen and enhance Ethics and Compliance. Implement an anonymous whistleblowing system	2024	2030	Anonymous whistleblowing system in place 0 Bribery & Corruption

* Gender representation tracking commenced in 2020. Goal reframed in 2025 from SDG 5 to SDG 10 to reflect broader inclusion and belonging objectives. Underlying data series is continuous. Workforce representation data disclosed under ESRS S1 EU regulatory requirements. See Regulatory Scope Notice, p.[2]. No employment decision is made on the basis of gender or any other protected characteristic.

Slide 4

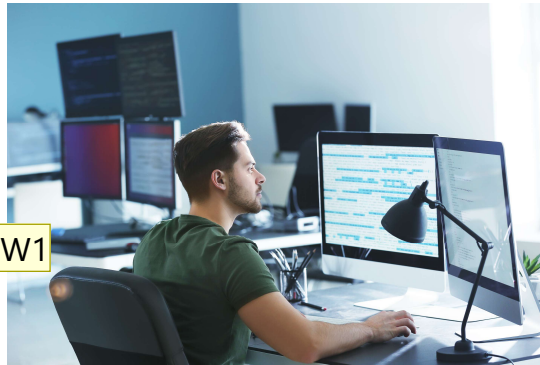
- VJ1** Would capitalize all Great Place to Work mentions since it's a specific award and we have it capitalized on the following page
Victoria Johnson, 2026-03-25T21:34:06.250
- VJ2** Heading and subheading formatting isn't uniform throughout. Some just capitalize the first word, and others have all or just some works capitalized
Victoria Johnson, 2026-03-25T22:05:37.736
- VJ3** It won't let me update formalise to formalize. starts deleting random letters when I try
Victoria Johnson, 2026-03-25T22:11:23.982
- AM3 0** [@Victoria Johnson] are you trying from browser or desktop? I find browser acts strange so desktop better
Adelina Morina, 2026-03-26T18:53:45.796
- LT4** We do not have great place to work in "all global offices." You should change to "select" offices per targeted strategy.
Laura Thiele, 2026-04-11T16:03:19.453
- LT5** We do not have a 35% share of women target. This was removed. Please delete.
Laura Thiele, 2026-04-11T16:03:44.453
- AM6** [@Peter Yeung] newly added Board oversight on Page 4
Adelina Morina, 2026-04-16T10:34:22.265
- PY6 0** Thanks!
Peter Yeung, 2026-04-16T10:39:40.565
- AM7** [@Christopher Bayliss] Goal reframed in 2025 from SDG 5 to SDG 10 to reflect broader inclusion and belonging objectives. In all areas where we mention gender representation, added footnote to highlight disclosure under ESRS and no employment decision is made on the basis of gender.
Adelina Morina, 2026-04-16T18:31:15.262
- CB8** edit on page 4 approved.
Christopher Bayliss, 2026-04-27T16:40:16.975

While the Group continues to explore opportunities to increase renewable energy sourcing, most office locations operate within serviced or leased facilities where direct control over electricity procurement is limited. As a result, renewable energy selection cannot be guaranteed across all sites. The Group therefore focuses on improving energy efficiency, consolidating infrastructure, and engaging suppliers with established decarbonization commitments rather than relying solely on direct procurement mechanisms. The consolidation of legacy data centers and continued migration toward hyperscale cloud providers with publicly disclosed decarbonization roadmaps remain central to the Group's environmental strategy. These actions are expected to contribute to further emissions intensity improvements over time.

During the reporting period, the Group consolidated certain third-party services into existing cloud provider ecosystems. This transition improved vendor consolidation, better transparency, and visibility over cloud service usage. While underlying infrastructure demand remained broadly consistent, the integration supports more effective monitoring and optimization of resource efficiency over time.

Although progress has been achieved, additional actions are required to support long-term targets. Priorities for the next reporting period include further supplier engagement, continued improvement in emissions measurement accuracy, and ongoing integration of sustainability considerations into operational decision-making processes.

VJ2



BW1

Social

Target: Optimizely has established key social priorities aimed at fostering a safe, inclusive and supportive work environment. The primary goals include:

AM9

- Ensuring and maintaining zero workplace incidents or accidents.
- Ensure physical risks assessments conducted regularly across all our operations
- Achieving recognition as a Great Place to Work across key offices by 2030
- Tracking workforce representation across all levels — including line managers and executive leadership — against our long-term inclusion benchmark, through talent development, progression, and equal opportunity recruitment practices.*
- Supporting workforce capability development in AI, digital skills, and responsible technology use

incidents reported throughout the year. This achievement was supported by regular training sessions on workplace environment and the implementation of measurable improvement actions.

LT7

We also made significant progress in workplace culture, successfully achieving and maintaining Great Place to Work certifications in our Hanoi (Vietnam), London (United Kingdom) and Dhaka (Bangladesh) offices. In terms of workforce representation, women accounted for 32% of the total workforce in 2025, increasing the percentage from the previous year. Notably, female representation within executive leadership reached 50% in 2025, with women comprising 39% of line managers, remaining stable compared to the previous year.

AM10

LT6

AM8

Performance: In 2025, Optimizely continued to uphold its strong commitment to health and safety, with no work-related



VJ3

Governance

Target: Following the implementation of the anonymous whistleblowing system in 2024, Optimizely's governance priorities are evolving toward strengthening compliance effectiveness, responsible innovation oversight, and value chain risk management.

Future objectives include increasing employee awareness and expanding compliance training coverage across at-risk functions, integrating ESG and compliance criteria into supplier management processes, and further embedding governance considerations into enterprise risk management frameworks. As AI capabilities expand across products and operations, the company also aims to formalize responsible AI governance mechanisms and enhance oversight of technology-related risks. These initiatives are intended to reinforce organisational resilience, regulatory alignment, and stakeholder trust over the long term.

Performance: During 2025, Optimizely continued to strengthen its governance framework. The anonymous whistleblowing platform remained operational with no substantiated incidents of bribery or corruption reported. Data governance and cybersecurity oversight were further reinforced through ongoing compliance initiatives and internal control enhancements. Sustainability data management, particularly emissions measurement and supplier integration, represents a notable improvement compared with prior years.

The successful attainment of **SOC 2 Type II** attestation in 2025 reflects Optimizely's continued investment in strengthening governance frameworks, enhancing control effectiveness, and supporting scalable, secure operations aligned with its long-term sustainability strategy.



VJ4

Looking ahead, Optimizely aims to continue strengthening governance maturity by enhancing compliance effectiveness, expanding supplier governance practices, and further integrating sustainability considerations into enterprise risk management processes. The Company is developing responsible AI governance frameworks aligned with emerging regulatory requirements, including the EU AI Act, to ensure that AI-enabled capabilities are deployed with appropriate oversight, transparency, and accountability.

* Workforce representation data disclosed under ESRS S1 EU regulatory requirements. See Regulatory Scope Notice, p.[2]. No employment decision is made on the basis of gender or any other protected characteristic.

Slide 5

- BW1** IS this Datadog? If it is then the spend just moved, we still use it
Ben Whitmarsh-Knight, 2026-03-18T15:15:36.515
- AM1 0** [@Ben Whitmarsh-Knight] Yes sort of, but at the same time our Scope 3 emissions have reduced in comparison to 2024 calculations, so assumed that was an explanation for it. I have to change this, but need some content / explanation as to why we have lower emissions this year. It may be that different vendor results to different emissions...need to look into it further
Adelina Morina, 2026-03-18T18:52:01.077
- VJ2** Should be data centers since brand guidelines use American English
Victoria Johnson, 2026-03-25T21:31:20.953
- VJ3** Maybe remove this picture so the primary goals aren't split/so they are easier to read
Victoria Johnson, 2026-03-25T21:32:34.328
- AM3 0** Moved to the other side. I didn't put too much effort on the images and hope we can still get some help from marketing 😊
Adelina Morina, 2026-03-26T19:01:18.426
- VJ4** Assuming this is still in progress?
Victoria Johnson, 2026-03-25T21:35:28.909
- AM4 0** Now complete
Adelina Morina, 2026-03-26T19:02:03.823
- LT5** This is not a goal. Who shared this with you?
Laura Thiele, 2026-04-11T16:04:50.400
- LT6** Delete this goal
Laura Thiele, 2026-04-11T16:05:29.953
- LT7** You need to reword this. You should say " we continue to value different perspectives and diversity of experience" across our workforce. We can no longer reference diversity in reference to gender, race, etc.
Laura Thiele, 2026-04-11T16:06:45.329
- AM8** Newly added
Covers:
employee future readiness
fair access to skills
internal mobility
Adelina Morina, 2026-04-14T11:15:58.169
- AM9** Changed from target to priorities
Adelina Morina, 2026-04-14T11:19:03.563
- AM10** [@Christopher Bayliss] same added footnote for clarity.
Adelina Morina, 2026-04-16T18:32:11.296
- CB11** edits on page 5 approved.
Christopher Bayliss, 2026-04-27T16:40:33.819

Innovation Leadership and Digital Impact



2

Optimizely's approach to digital innovation is centred on delivering high-quality, accessible, and data-informed digital experiences. *The Total Economic Impact™ of Optimizely One* study indicates that integrated digital experience platforms can enhance user engagement, improve accessibility, and support more effective interaction between organisations and their end users.

The research highlights that improved content management, experimentation, and personalisation capabilities enable organisations to deliver more relevant and responsive digital experiences. These enhancements contribute to improved navigation, faster load times, and more accessible digital interfaces, supporting inclusive user engagement and alignment with recognised accessibility standards.

In addition, enhanced analytics capabilities enable organisations to derive more timely and actionable insights from user data. This supports more informed decision-making processes, strengthens operational governance, and reduces reliance on fragmented or manual data analysis. The availability of centralised dashboards and integrated data environments can also improve transparency and consistency in performance monitoring.

The study further indicates that integrated digital platforms can contribute to improved organisational efficiency. Streamlined workflows, reduced reliance on legacy systems, and increased availability of self-service tools support more efficient content creation and management processes. These changes can reduce operational friction and contribute to a more positive employee experience by enabling teams to focus on higher-value activities.

3

Emerging artificial intelligence capabilities within digital platforms are also expected to support efficiency gains by enabling automation of routine analytical and content-related tasks. While these capabilities are still evolving, they present opportunities to enhance insight generation, improve decision quality, and support scalable digital operations.

Overall, these findings indicate that digital experience technologies can play a role in supporting more inclusive, efficient, and data-driven business practices. Optimizely continues to invest in innovation across its platform to support responsible digital development, improved user outcomes, and long-term value creation.

These insights are based on a commissioned Total Economic Impact™ study conducted by Forrester Consulting and reflect aggregated customer experiences under defined assumptions.

Forrester

A Leader — **The Forrester Wave™: Digital Experience Platforms, Q4 2025**

- Highest possible scores in multiple criteria including content management, experimentation, AI personalisation, and orchestration.

A Leader — **The Forrester Wave™: Content Management Systems, Q1 2025**

- Recognised as a comprehensive content orchestration platform with strong optimization and collaboration features.

A Leader — **The Forrester Wave™: Experience Optimization Solutions, Q4 2024**

- Top-ranked in both Strategy and Current Offering categories.

Gartner

A Leader — **2025 Gartner Magic Quadrant™ for Digital Experience Platforms**

- Sixth consecutive year; positioned highest for Ability to Execute and Completeness of Vision.

A Leader — **2025 Gartner Magic Quadrant™ for Personalization Engines**

- Recognized across personalization capabilities and AI-driven customer experiences.

A Leader — **2025 Gartner Magic Quadrant™ for Content Marketing Platforms**

- Eighth consecutive year recognition.

HW4

Slide 6

- AM1** [@Haley Williams] - Thank you for comments, revising the entire page (page 7 to delete entirely), do you see any issues with this?
Adelina Morina, 2026-03-26T18:24:35.305
- 1 0** No issues from my end. If you want to list our Leader placements, that's okay - let me know what the goal of this page is and we can make it work.
Haley Williams, 2026-03-26T19:41:02.172
- AM1 1** We just want to showcase business strategy but the focus should be on sustainability impacts, risks, and governance.
Adelina Morina, 2026-03-26T20:07:30.063
- 2** If we're not going to mention any other analyst reports, we should remove this image and replace with the TEI promo here:
<https://brand.optimizely.com/document/112#/analyst-reports-2025/forrester-tei-study-20>
Haley Williams, 2026-03-26T19:26:20.203
- 3** Do we want to include any of the stats? 446% ROI over three years
Payback in just <6 months
\$5.8M business benefit (net present value)
\$650K saved in tech costs
+40% developer efficiency
+35% marketer efficiency
+30% data analyst efficiency
Haley Williams, 2026-03-26T19:38:34.931
- AM3 0** I did have this earlier, but now looking further into it We can still reference value creation, but we should avoid quoting ROI figures in the ESG report because they are not ESG metrics and are based on a commissioned study. Safer to take out I think.
- Alternatively if we say Independent research indicates that organisations may realise measurable economic value from digital experience platforms, including efficiency gains and improved operational performance, we could then add TEI promo. Have to be careful though as this is too much of marketing strategy. The EU just made it illegal to make any claims without data being proven, so again I think best to leave it out.
Adelina Morina, 2026-03-26T19:58:15.720
- HW4** These are the official report titles, please do not change them or we will be out of compliance with each firm.
Haley Williams, 2026-03-31T19:58:39.212

Double materiality assessment

Alignment with CSRD and relevancy to the DXP industry

In alignment with the Corporate Sustainability Reporting Directive (CSRD), Optimizely conducted its initial double materiality assessment in 2023 and refreshed the assessment in 2024 and 2025 in accordance with ESRS requirements. The assessment identifies and prioritises sustainability topics based on:

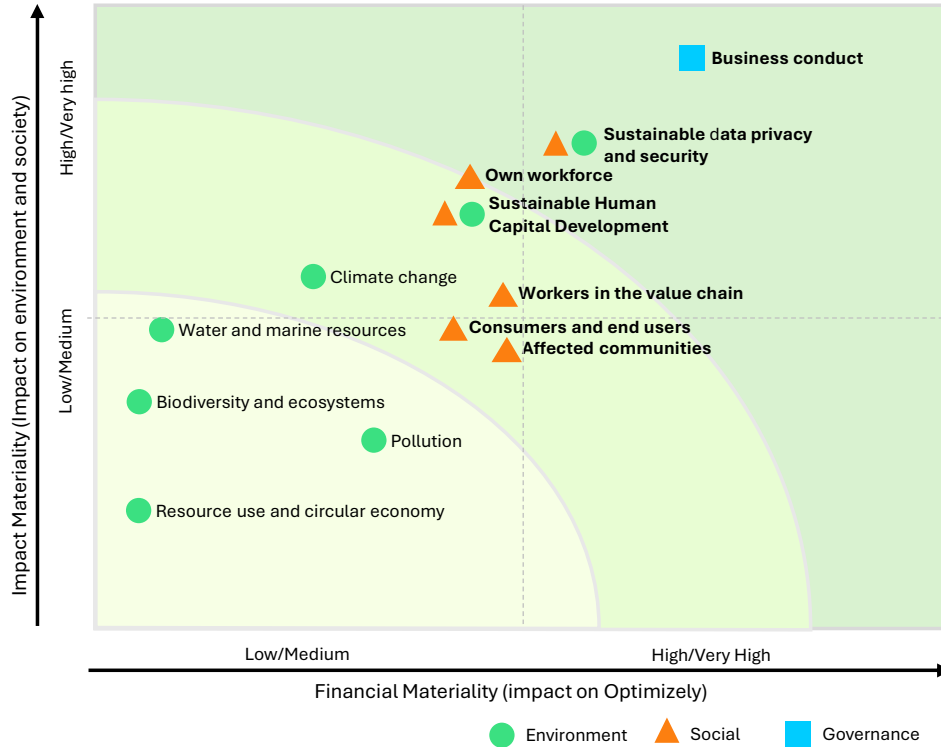
- The severity and likelihood of actual and potential impacts

on society and the environment; and

- The extent to which sustainability matters may influence enterprise value through financial risks or opportunities.

The double materiality assessment is illustrated in the matrix below:

VJ1



Approach and Methodology

Optimizely applied a structured, multi-step process to conduct the double materiality assessment:

- Topic identification:** We developed a preliminary list of sustainability topics relevant to DXP industry by reviewing sector standards (benchmarking against reliable international guidelines and frameworks such as GRI, SASB for software and IT services) and peer benchmarking.
- Stakeholder engagement:** Key internal and external stakeholders – including employees, executives, customers, suppliers, partners, and investors were engaged through interviews, surveys and workshops. Their feedback were instrumental in validating topic relevance and prioritization.

- Materiality analysis:** Each topic was assessed from two dimensions:
 - Impact materiality:** The actual or potential positive and negative impacts of Optimizely’s operations and activities on the environment and people.
 - Financial materiality:** The extent to which these topics could influence Optimizely’s enterprise value, including risks and opportunities.
- Validation:** Final validation was carried out by the ESG Steering Committee, aligning outcomes with Optimizely’s business strategy and risk management framework. Outcomes were presented to the Board of Directors, which retains ultimate oversight of material sustainability risks identified through this process.

AM4

Key material topics and assessment outcomes

Material topics	Impact materiality	Financial materiality	Description
Climate change	Medium	Medium	Emissions from cloud infrastructure and upstream vendors contribute to environmental footprint.
Business Conduct	Very high	Very high	Zero-tolerance for bribery and corruption is key to legal compliance and stakeholder confidence As AI becomes integrated into DXP offerings, ethical design, fairness and transparency are critical

VJ2

Slide 7

- VJ1** don't think we need the "and;" at the end of the first bullet
Victoria Johnson, 2026-03-25T21:40:21.129
- VJ2** would keep the capitalization or lack of uniform for the categories below
Victoria Johnson, 2026-03-25T21:42:02.505
- VJ3** Likely not the first mention in this report, but don't think we need to capitalize cloud
Victoria Johnson, 2026-03-25T21:44:37.777
- AM4** [@Peter Yeung] addition on Page 7 Board oversight for Validation
Adelina Morina, 2026-04-16T10:35:32.165

Key material topics and assessment outcomes (cont.)

Material topics	Impact materiality	Financial materiality	Description
Sustainable data privacy and security	Very high VJ5	High	Fundamental to customer trust, product integrity and regulatory compliance (GDPR, CCPA). Revised from 'very high' to 'high' in 2025, reflecting strengthened governance and control effectiveness following the successful attainment of SOC 2 Type II attestation. While the inherent risk remains significant, enhanced monitoring, control assurance and incident prevention capabilities have reduced the potential financial exposure
Sustainable Human Capital Development	High	High	Inclusion and belonging drives innovation, talent attraction and long-term reputation
Own workforce	High	Medium	A strong workplace culture and psychological safety are essential for employee performance and retention.
Workers in the value chain	High	Medium BW1	Optimizely relies on external vendors (Cloud providers, outsourced workforce). Fair labor practices, safe working conditions and freedom of association must be ensured to avoid reputational risks and stakeholders' concerns.
Affected communities	Medium	Medium	Products and platforms developed by Optimizely influence how communities get access and experience in the digital world. Inclusive design and accessibility have society impact and business potential
Consumers and end users	Medium	Medium	Data privacy, consent and user control: As a digital platform provider handling vast amount of behavioral and personal data, ensuring transparent and secure data handling is critical. Algorithmic Transparency & AI Ethics: DXP personalization tools use AI and algorithms, ensuring these are not biased or opaque is essential for trust and compliance
Resource use and circular economy	Medium BW2	Low	Cloud Infrastructure Resource Efficiency: Cloud services and data centers consume vast amount of energy, water, and hardware resources. Vendor selection and optimization strategies can reduce indirect environmental impacts. IT Equipment Life Cycle management: Although Optimizely is not a hardware producer, regular device upgrades and global office operations contribute to electronic waste. Managing asset lifecycle and reuse programs matters.
Water and Marine Resources	Low/Medium	Low BW3	The impact materiality rating was refined from 'medium' to 'low/medium' following improved boundary definition and attribution of impacts within the value chain. While cloud infrastructure providers may have significant water-related impacts at data centre level, Optimizely's role is indirect, with limited influence over site-level water use. Office water consumption remains immaterial. As a result, the assessed severity and scale of direct impact have been adjusted
Biodiversity and Ecosystems	Low/Medium	Low/Medium BW4	Indirect impact via cloud infrastructure providers: Large-scale data centers can have impacts on local land use, water systems and ecosystems. Vendor due diligence is of great importance. Reassessed from 'low' to 'low/medium' in 2025. This reflects a refinement of impact attribution across the value chain, and an enhanced assessment of indirect financial exposure related to reliance on third-party cloud infrastructure.
Pollution	Low/Medium	Low/Medium	Air emissions from cloud infrastructure: Optimizely relies on third-party data centers, which may emit pollutants during energy generation, especially if fossil-fuel-based. E-waste and office waste: Improper disposal of IT hardware can result in hazardous material leakage such as heavy metals, indirectly contributing to soil and water pollution. Office waste is limited, but internal waste management policies contribute to overall pollution mitigation. Reassessed from 'low' to 'low/medium' in 2025. This reflects a refinement of impact attribution across the value chain, and an enhanced assessment of indirect financial exposure related to reliance on third-party cloud infrastructure.

The following chapter we will go into details for each material topics.

Slide 8

- BW1** [@Adelina Morina] This is one of a few rows where materiality rating has changed. Do we need to explain why this has changed?
Ben Whitmarsh-Knight, 2026-03-18T15:12:10.366
- BW2** [@Adelina Morina] unexplained materiality changes as above.
Ben Whitmarsh-Knight, 2026-03-18T15:13:50.218
- BW3** [@Adelina Morina] unexplained materiality changes as above.
Ben Whitmarsh-Knight, 2026-03-18T15:14:02.313
- BW4** [@Adelina Morina] unexplained materiality changes as above.
Ben Whitmarsh-Knight, 2026-03-18T15:14:27.639
- VJ5** same comment here re: capitalization from last slide
Victoria Johnson, 2026-03-25T21:42:55.693

ESRS E1 – Climate change



Climate-related Impacts, Risks, and Opportunities

The 2025 double materiality assessment identified climate change as a material topic under both impact and financial perspectives.

Impact materiality was assessed as **Medium**, due to the indirect emissions associated with cloud infrastructure and digital services that Optimizely both consumes and enables for clients. The company also plays a role in reducing emissions through efficient digital experience platforms.

Financial materiality was determined to be **Medium**, due to potential future exposure to carbon pricing mechanism, increased reporting expectations (EU CSRD) and changing procurement standards from enterprise clients focused on sustainability.

Risks:

Transition risks from increasing regulatory pressure (carbon pricing, CSRD compliance)
Reputational risks if climate-related expectations from clients and investors are not met
Supply chain risks, particularly if key vendors fail to decarbonize

Opportunities:

Enhancing brand trust by delivering carbon-conscious digital products
 Cost-savings from energy efficient operations and cloud optimization

Policies related to climate change

Focus on resilience and opportunities: Optimizely develops a climate policy to support business resilience by ensuring operational sustainability and by addressing the environmental impacts of digital infrastructure. Key strategic pillars include:

- Reducing operational GHG emissions through energy efficiency and renewable energy.
- Collaborating with cloud providers to improve transparency and reduce emission intensity
- Positioning the company's DXP solutions as enablers of sustainability for clients

Transition Plan for Climate Change Mitigation - Taking action on material impact, **BW2**d opportunities

Optimizely's transition plan for climate change mitigation is aligned with the goal of limiting warming to 1.5°C. Optimizely is committed to achieving Net Zero GHG emissions across its Scope 1 and 2 operations by 2050. Given that 98% of total emissions arise from Scope 3 value chain sources — primarily cloud infrastructure — the Group has adopted an intensity-based target to reduce Scope 3 emissions by 30% per \$1,000 revenue by 2030, using 2024 as the baseline year. A phased strategy has been implemented across core business functions including product development and delivery, cloud infrastructure, office operations and marketing activities.

Scope 1 emissions, Scope 1 rose from 0 tCO₂e (2024) to 17 tCO₂e (2025), attributes to refrigerants estimation not previously reported.

Scope 2 emissions, driven by in-house purchased electricity for our offices, so considerations on selecting office space with renewable source and energy efficient targets. Data centers are being mitigated by server consolidation and plans for full cloud migration. Our new Stockholm office is powered by 100% electricity from renewable sources and incorporates rainwater and snow reuse systems. Our Germany office also utilizes 100% renewable sources.

Scope 3 emissions, which accounts for 98% of total emissions, arise mainly from purchased services, business travel **BW1** waste. Business travel emissions increased by 21% in 2025, amounting to 2,175 tons, due to improvements in our ability to capture and measure the data. Future efforts are focused on sustainable travel tools, Navan, which was implemented during the first half of 2024 and travel policy refinement. The increased emissions in business travel represents full actual data availability in 2025 compared to partial estimation on 1st quarter of 2024. An e-waste management program is developed to recycle 100% of our computers with backing evidence of certificate of destructions. Future efforts will be to capture actual PCF data on asset register and record actual emissions across lifecycle phases. An increase on e-waste is an estimation and future developments to capture more accurate data are underway.

Throughout 2025, Optimizely undertook initiatives aimed at automating actual data from our key strategic cloud providers in **BW3** emission accounting to ensure accurate and reliable GHG measurement. This will support data-driven decision-making and performance tracking across global entities.

During 2025, the Group completed the transition away from in-house data centre providers from four to zero, achieving full migration of product development and delivery to cloud infrastructure operated by Microsoft Azure, Google Cloud, and Amazon Web Services. This transition supports alignment with providers that have established net zero roadmaps. Additionally, the acquisition of NetSpring enabled the consolidation of data analytics warehousing, reducing fragmented storage environments and improving operational efficiency and infrastructure management.

Targets related to climate change mitigation

To measure emissions more effectively against business performance, Optimizely has adopted an intensity-based target to reduce Scope 3 emissions by 30% per \$1,000 revenue by 2030, using 2024 as a baseline. Intensity reduced by 12.9% from 2024 to 2025.

The company continues to integrate sustainability KPIs into its internal systems and it's exploring automation in data management. As an effort to increase transparency, Optimizely has disclosed its climate data through CDP and remains committed to strengthening its climate disclosures and partnership across the value chain.

As a Wave 2 CSRD reporter preparing voluntarily ahead of its mandatory FY2027 obligation, Optimizely will further develop and formalise this transition plan in alignment with simplified ESRS standards expected in mid-2026.

Governance Responsibility

Oversight of climate-related topics is integrated into Optimizely's sustainability and enterprise risk management governance framework. Operational responsibility for emissions measurement and climate initiatives sits within relevant business functions, with periodic reporting provided to senior management to support strategic decision-making and risk oversight.

Disclosures on emissions Scope 1, 2, 3 can be found on the following page.

Slide 9

- BW1** [[@Adelina Morina](#)] this is quite vague and I don't think we should say 'probably due to...'; we need to be more definitive - something like 'this increase was due to improvements in our ability to capture and measure the data rather an increase in the underlying travel activity'
Ben Whitmarsh-Knight, 2026-03-18T15:23:51.958
- BW2** Do we need to comment on the impact of the AI focus/Opal here?
Ben Whitmarsh-Knight, 2026-03-18T15:28:20.825
- BW3** Is there a target timeline for this we can share?
Ben Whitmarsh-Knight, 2026-03-18T19:28:08.651
- AM3 0** Its never really clear to me re managed data centre or how many are there exactly, I thought it was 4 in total. I do believe we had one in Santa Clara under this vendor V7751 Evocative which was already terminated in late 2025. If I also recall Christian Stanton mention closure of Managed Data centres, was that all managed data centres, I don't know. Brian Alden just confirmed all our infrastructure has moved to the cloud. I don't really know where 6 came from
Adelina Morina, 2026-03-19T15:05:32.705
- AM3 1** I think Lan may have added office server room, we had one in Germany and closed when we moved office!
Adelina Morina, 2026-03-19T18:29:28.673

tCO ₂ e	2023	Base year 2024	2025	% change from base year	Target	
					Medium 2030	Long term 2050
Scope 1 GHG emissions						
Gross Scope 1 GHG emissions	14	0	17		-30%	-50%
Scope 2 GHG emissions						
Gross local-based Scope 2 GHG emissions	400	116	195	↑ 68.1%	-30%	-50%
Gross market-based Scope 2 GHG emissions	156	143	190	↑ 32.87%	-30%	-50%
Scope 3 GHG emissions						
Total gross indirect Scope 3 GHG emissions	6,665	12,680	11,511	↓ -9.22%	-30%	-50%
3.1 Purchased goods and services	5,505	9,128	7,780	↓ -14.77%	-30%	-50%
3.2 Capital goods	Not reported	45	40	↓ -11.11%		
3.3 Energy	94	26	46	↑ +76.92%		
3.5 Electronic waste	Not reported	0.2	1	↑ +400%		
3.6 Business travel	1,066	1,801	2,175	↑ +20.77%	-30%	-50%
3.7 Employee commuting	Not reported	1,571	1,390	↓ -11.52%		
3.8 Upstream	Not reported	108	79	↓ -26.85%		
Total GHG emissions Location Based	7,079	12,796	11,723	↓ -8.39%	-30%	-50%
Total energy Kwh	Not reported	460,170.13	405,288.299	↓ -11.93%		
Renewable energy Kwh		Not reported	45,366			
Total energy Gigajoule	Not reported	1,656.61	1,459.04	↓ -11.93		
Renewable energy Gigajoule		Not reported	163.32			
tCO₂e per 1,000 USD revenue	Not reported	0.031	0.027	↓ -12.9%		
Intensity target tCO₂e per 1 Mil USD revenue	Not reported	31	27	↓ -12.9%	-30%	-50%

Scope 1 emissions include refrigerants estimation not previously reported. Scope 2 emissions include electricity purchase on our operations offices.

Given that 98% of our GHG emissions fall under scope 3 primarily arising from supply chain activities, we have adopted an intensity-based emissions reduction target. This approach allows us to measure our environmental impact relative to business growth and evolving market demands, providing a more accurate reflection of operational efficiency.

Our goal is to reduce Scope 3 emissions intensity by 30% per \$1,000 revenue by 2030 using 2024 as baseline year. 2025 resulted in a decrease of 12.9%

Key strategies to achieve this target include:

- Collaborating with cloud providers for more transparent and accurate reporting
- Encouraging remote work practices and reducing non-essential business travel
- Promoting responsible end-user behavior that minimize energy consumption
- Optimizing software efficiency to reduce energy demands

We recognize the evolving nature of emissions accounting in the tech sector and Optimizely is committed to improving data transparency. As we refine our data collection and build partnerships with key value chain stakeholders, we will explore setting complementary absolute reduction targets to further strengthen our climate commitments.

ESRS E5 – Resource use and Circular economy

Impacts, Risks, and Opportunities

BW1

VJ3

The 2025 double materiality assessment identified resource use and circular economy as a material topic from both impact and financial perspectives.

Impact materiality was assessed as **Medium**, reflecting the indirect resource consumption associated with cloud infrastructure, IT hardware procurement, and digital operations across the value chain. Although Optimizely does not manufacture physical products, its activities influence the lifecycle of electronic equipment, data infrastructure utilization, and supplier resource efficiency through procurement decisions and technology architecture. The company therefore recognizes its responsibility to promote resource efficiency and circular practices within its operational boundaries and value chain relationships.

Financial materiality was determined to be **Low**. While resource consumption does not currently represent a major direct cost driver, inefficient infrastructure utilization, increasing regulatory requirements related to electronic waste, and stakeholder expectations regarding sustainable IT management may create future cost exposure and operational risks. Conversely, improved efficiency in infrastructure utilization and hardware lifecycle management may support operational cost optimization and risk reduction over time.

Risks:

Include increasing demand for computing capacity associated with AI-enabled services, potential regulatory developments related to electronic waste management, and indirect environmental exposure through third-party infrastructure providers.

Opportunities:

Include cost efficiencies through infrastructure optimization, reduced hardware replacement cycles, improved supplier selection, and strengthened brand positioning through responsible technology practices.

Policies related to resource use and circular economy

Optimizely recognizes that although it is not a hardware manufacturer, its operational footprint across global offices and cloud platforms contributes to resource consumption and waste. The company is committed to energy efficiency through two primary focus areas:

- Cloud infrastructure Resource efficiency: by optimizing vendor selection for Cloud services providers, consolidating data centers, and prioritizing suppliers committed to environmental performance.
- IT equipment Lifecycle Management, by extending the useful life of hardware, implementing reuse strategies, and ensuring responsible e-waste recycling.

Optimizely prioritizes partnerships with cloud infrastructure providers demonstrating strong environmental performance, including commitments to renewable energy sourcing, infrastructure efficiency, and circular economy initiatives. Procurement and vendor management processes increasingly consider environmental criteria where relevant. For IT equipment, the company seeks to extend the useful life of hardware through reuse, redeployment, and responsible disposal practices. When equipment reaches end-of-life, Optimizely works with certified recycling providers to ensure appropriate treatment and recovery of materials.

Taking action on material impact, risks and opportunities

During 2025, Optimizely continued to optimise its infrastructure footprint through consolidation initiatives and migration toward hyperscale cloud environments. These actions support improved resource utilization, reduced duplication of infrastructure, and enhanced operational efficiency.

The consolidation of legacy systems and integration of acquired technologies contributed to reductions in fragmented data storage and hardware requirements. Infrastructure optimization initiatives also supported improvements in emissions measurement and operational performance.

In office operations, the company implemented responsible equipment management practices during office transitions, including redeployment of usable devices to employees and responsible recycling through specialist vendors. These actions contributed to waste reduction and resource recovery.

Optimizely continues to collaborate with suppliers to improve transparency related to environmental performance, particularly for cloud infrastructure providers whose operations represent the largest share of indirect resource consumption.

Targets related to resource use and circular economy

While quantitative targets specific to circular economy performance are still under development, Optimizely has established directional objectives to strengthen resource efficiency over time.

These include:

- Continued optimization and consolidation of data infrastructure to reduce duplication and improve utilization efficiency
- Extending the lifecycle of IT equipment through reuse and redeployment where feasible
- Increasing the proportion of hardware disposed through certified recycling or reuse channels
- Strengthening supplier engagement related to environmental performance and circular practices

As measurement maturity improves, the company intends to develop more defined performance indicators and targets related to digital resource efficiency and equipment lifecycle management.

Governance Responsibility

Responsibility for resource efficiency and circular economy initiatives is embedded within operational functions managing infrastructure, procurement, and workplace operations. Oversight is coordinated through the company's sustainability governance framework, with management monitoring progress as part of broader environmental performance oversight.

Slide 11

- BW1** General comment- we don't talk about AI here at all, should we?
Ben Whitmarsh-Knight, 2026-03-18T15:29:18.568
- VJ2** Don't want to mess with formatting here but we no longer have the space in between paragraphs like we do above
Victoria Johnson, 2026-03-25T21:52:57.253
- VJ3** same here, deletes random letters when I try to update optimise to optimize as well as utilisation to utilization
Victoria Johnson, 2026-03-25T22:12:16.648

ESRS E3 – Water and marine resources

Impacts, Risks, and Opportunities

The 2025 double materiality assessment identified water and marine resources as a material topic primarily due to indirect impacts associated with the company's value chain.

Optimizely's direct water consumption is limited and relates primarily to office facilities used by employees. These impacts are considered low given the nature of the company's operations as a digital technology provider without manufacturing or water-intensive processes. However, indirect water use associated with cloud infrastructure, data center operations, and supplier activities represents a more relevant area of consideration.

Impact materiality was therefore assessed as **Low to Medium**, reflecting the company's limited operational footprint but recognizing potential environmental impacts within upstream and downstream value chain activities.

Financial materiality was determined to be **Low**. While current operations do not expose the company to significant financial risks from water use, potential future regulatory shifts and stakeholder expectations on environmental performance may affect vendor relations and sustainability ratings.

Risks:

Potential risks may arise through regulatory developments, climate-related water scarcity affecting supplier operations, and increasing stakeholder expectations related to responsible resource management.

Opportunities:

Opportunities exist to support improved water stewardship indirectly through supplier selection and collaboration with infrastructure providers that demonstrate strong environmental performance, including water efficiency initiatives.

The company assessed materiality by considering operational activities, supplier dependencies, environmental exposure across geographic locations, and emerging regulatory trends related to water management and climate adaptation.

Policies related to water and marine resources

Optimizely does not currently maintain a standalone water management policy due to the limited direct water use associated with its operations. Instead, water considerations are addressed indirectly through environmental management practices, supplier engagement, and resource efficiency initiatives.

- The company prioritizes collaboration with cloud infrastructure providers and facility partners that demonstrate commitments to environmental sustainability, including responsible water management practices.
- Procurement and vendor selection processes may incorporate environmental considerations where relevant.
- Within office operations, water consumption is managed through building management systems operated by landlords or facility providers. Optimizely supports efficient resource use through employee awareness and sustainable workplace practices where feasible.

Taking action on material impact, risks and opportunities

During 2025, the company continued to operate primarily within leased office environments where water management is controlled by property managers. As a result, direct influence over water consumption is limited.

The most significant indirect water-related impacts remain associated with cloud infrastructure providers supporting the company's digital services. Optimizely continues to monitor supplier sustainability disclosures and environmental performance commitments, including initiatives related to energy and water efficiency within data center operations.

Office consolidation and hybrid working arrangements implemented in prior periods also contributed to reduced resource consumption associated with physical workplace operations, including water use.

Targets related to water and marine resource efficiency

Given the limited direct water consumption associated with its operations, Optimizely has not established quantitative water reduction targets at this time. However, the company has identified several directional objectives:

- Monitoring developments related to water stewardship among key infrastructure suppliers
- Supporting resource efficiency through office consolidation and hybrid working practices
- Considering environmental performance, including water management, in supplier engagement where relevant

As sustainability measurement capabilities continue to develop, the company will evaluate opportunities to enhance monitoring and target setting related to indirect environmental impacts across its value chain.

Governance responsibility

Given the limited direct operational water use, oversight of water-related considerations is integrated into broader environmental and supplier governance processes. Management monitors indirect risks associated with infrastructure providers and facility operations as part of sustainability and risk management activities.

ESRS E2 – Pollution

Material impacts, Risks, and Opportunities

The 2025 double materiality assessment identified pollution as a material topic primarily due to indirect environmental impacts associated with the company's value chain. Optimizely's direct operations do not involve manufacturing processes, industrial emissions, or the use of hazardous substances at scale, and therefore direct pollution impacts are considered limited.

Impact materiality: Potential environmental impacts arise indirectly through activities such as cloud infrastructure operations, IT equipment lifecycle management, office facilities, and supplier activities. These impacts may include air emissions associated with energy generation, electronic waste disposal, and the use of materials within hardware supply chains. Impact materiality was therefore assessed as **Low to Medium**, reflecting limited direct control but recognizing the broader environmental footprint associated with digital infrastructure and procurement activities.

Financial materiality was determined to be **Low to Medium**. Pollution currently poses limited direct financial risk, however, growing expectations from clients, regulators and investors regarding IT disposal and procurement may influence long-term reputation and procurement policies.

Risks:

Lack of internal disposal capacity for IT waste, indirect reputational exposure through supplier misconduct in pollution control.

Opportunities:

Opportunities exist to reduce environmental exposure through responsible procurement practices, infrastructure optimization, and improved lifecycle management of IT equipment.

The company assessed materiality by considering operational activities, supplier dependencies, regulatory developments, and potential environmental impacts associated with digital infrastructure and hardware lifecycle stages.

Policies related to Pollution

Optimizely does not maintain a standalone pollution management policy due to the limited direct pollution risks associated with its operations. Instead, pollution considerations are addressed through broader environmental management practices, procurement processes, and supplier engagement activities.

Policies on pollution prevention focus on:

- Managing the life cycle of IT equipment to minimize hazardous e-waste, including reuse, redeployment, and recycling of electronic equipment. When equipment reaches end-of-life, Optimizely works with certified disposal and recycling providers to ensure appropriate treatment and material recovery.
- Supply chain management to minimize pollutants in their operations. The company also operates primarily within leased office environments where environmental controls, including waste management and building emissions, are managed by facility providers.
- Preventing air pollution from business travel and logistics associated with events and marketing campaigns.

Taking action on material impact, risks and opportunities

During 2025, Optimizely continued to implement responsible IT asset management practices across its operations, including redeployment of usable equipment and certified recycling of obsolete devices. Office transitions and consolidation activities were managed with consideration for waste reduction and responsible disposal.

Infrastructure optimization initiatives also contributed indirectly to pollution reduction by reducing duplication of systems and improving efficiency within digital operations. Collaboration with major cloud infrastructure providers remains an important mechanism for managing indirect environmental impacts associated with emissions and pollution within the value chain.

The company continues to monitor supplier sustainability commitments and environmental disclosures to better understand potential pollution-related exposures across its operations.

Targets related to pollution

Given the limited direct pollution impacts associated with its operations, Optimizely has not established quantitative pollution reduction targets. However, the company has identified several directional objectives:

- Increasing the proportion of IT equipment disposed through certified recycling or reuse channels
- Supporting responsible lifecycle management of hardware assets
- Considering environmental performance, including pollution-related impacts, within supplier engagement processes
- Continuing infrastructure optimization to reduce indirect environmental impacts

As environmental measurement capabilities develop, Optimizely intends to evaluate opportunities to strengthen monitoring and target setting related to indirect pollution impacts within its value chain.

Governance Responsibility

Pollution-related considerations are addressed through environmental management practices, procurement processes, and supplier engagement activities. Oversight is incorporated into the company's sustainability governance framework, with responsibility shared across operational functions managing infrastructure, equipment lifecycle, and facilities.

ESRS E4 – Biodiversity and ecosystems

Impacts, Risks, and Opportunities

The 2025 double materiality assessment identified biodiversity and ecosystems as a material topic primarily due to indirect environmental impacts associated with the company's value chain. Optimizely's direct operations are limited to office environments and digital infrastructure services and do not involve land-intensive activities, resource extraction, or operations located within or near protected areas.

Impact materiality: Direct impact was assessed as **Low**. However, indirect impacts may arise through upstream and downstream activities, including the construction and operation of data centres, manufacturing of IT equipment, energy generation within supply chains, and office facilities managed by third parties. These activities may contribute to land use change, resource extraction pressures, and ecosystem degradation outside the company's direct operational control. Impact materiality was therefore assessed as **Low to Medium**, reflecting limited direct exposure but recognizing broader environmental dependencies across the value chain.

Financial materiality was determined to be **Low to Medium**. Biodiversity-related risks are not currently financially material to Optimizely's operations. However, growing regulatory and stakeholder expectations around ecosystem protection in global supply chains may increase future scrutiny.

Risks:

Potential risks may arise through regulatory developments, climate-related environmental changes affecting infrastructure providers, or reputational exposure associated with environmental impacts within supplier operations.

Opportunities:

Opportunities exist to support improved environmental outcomes indirectly through responsible procurement, collaboration with sustainability-focused infrastructure providers, and efficiency improvements that are expected to reduce environmental footprint, example energy consumption, material use, where measurable.

The company assessed materiality by considering operational activities, geographic exposure, supplier dependencies, and emerging regulatory expectations related to biodiversity and environmental protection.

Policies related to Biodiversity and ecosystems

Optimizely does not maintain a standalone biodiversity policy due to the limited direct impact associated with its operations. Instead, biodiversity considerations are addressed indirectly through environmental management practices, supplier engagement, and procurement decisions.

- The company prioritises collaboration with infrastructure providers and suppliers that that publicly report sustainability initiatives or commitments, including responsible land use, energy efficiency, and environmental management practices.
- Vendor selection processes may incorporate sustainability considerations where relevant, particularly for strategic technology partners.
- Within office operations, environmental impacts are largely managed by landlords and facility providers. Optimizely supports sustainable workplace practices and resource efficiency initiatives where feasible.

Taking action on material impact, risks and opportunities

During 2025, the company continued to operate primarily within leased office environments, limiting direct influence over land use and ecosystem impacts. Infrastructure consolidation initiatives and migration toward hyperscale cloud environments contributed to improved resource efficiency, which may contribute to reduced infrastructure-related resource use, although impacts are indirect and primarily driven by third-party providers.

Collaboration with major cloud providers remains an important mechanism for managing indirect environmental impacts, as these providers increasingly implement sustainability initiatives related to renewable energy, resource efficiency, and environmental stewardship.

Optimizely continues to monitor supplier sustainability disclosures and publicly reported commitments to improve understanding of potential biodiversity-related risks within its value chain.

Targets related to Biodiversity and ecosystems

Given the limited direct biodiversity impacts associated with its operations, Optimizely has not established quantitative biodiversity targets. However, the company has identified several directional objectives:

- Considering environmental performance and sustainability commitments in supplier engagement processes
- Supporting infrastructure optimization initiatives that reduce overall environmental footprint
- Monitoring emerging regulatory developments and stakeholder expectations related to biodiversity and ecosystems

As sustainability measurement capabilities evolve, the company will evaluate opportunities to enhance monitoring and target setting related to indirect environmental impacts across its value chain.

Governance Responsibility

Biodiversity considerations are managed primarily through supplier engagement and environmental risk monitoring processes. Oversight is integrated into sustainability governance and enterprise risk management activities, reflecting the company's indirect exposure through value chain dependencies.

ESRS G1 – Business Conduct

Governance underpins Optimizely's ability to operate responsibly, manage risk, and create long-term value. As a Digital Experience Platform provider serving more than 10,000 businesses globally, the Group's ecosystem processes sensitive data, influences digital user experiences, and supports enterprise transformation across multiple sectors. Robust corporate governance is therefore essential not only for regulatory compliance but also for maintaining stakeholder trust and enabling responsible innovation.

VJ1

Optimizely aligns its governance framework with international standards, regulatory requirements, and internal policies, covering Board oversight, executive accountability, ethical business conduct, anti-bribery and anti-corruption, stakeholder engagement, data governance, and responsible AI deployment. Governance considerations are integrated into enterprise risk management processes and strategic decision-making.

Material impacts, Risks, and Opportunities

The 2025 double materiality assessment identified Business conduct as a material topic under both impact and financial perspectives.

Impact materiality The 2025 double materiality assessment identified Business Conduct as a topic of **Very High** impact materiality due to Optimizely's role as a global digital technology provider whose platforms process significant volumes of data and influence digital experiences across multiple industries. Governance failures, unethical behaviour, corruption practices, or misuse of technology could create adverse impacts for customers, end users, employees, business partners, and society more broadly. In particular, risks related to data misuse, unethical AI deployment, or weak internal controls could undermine trust in digital ecosystems and affect stakeholder confidence. The assessment considered the company's operational footprint, stakeholder expectations, regulatory exposure, and the potential scale of impacts associated with governance failures.

Financial materiality Business Conduct was also assessed as **Very High** financial materiality. Governance or compliance failures could result in regulatory penalties, contractual liabilities, litigation exposure, operational disruption, and reputational damage, particularly given the company's enterprise client base and operations across multiple jurisdictions. Increasing regulatory scrutiny related to data protection, cybersecurity, anti-corruption, and artificial intelligence governance further elevates the financial risk exposure. Conversely, strong governance practices support customer confidence, access to regulated markets, and long-term enterprise value creation.

Materiality was assessed through consideration of the company's business model, stakeholder expectations, regulatory environment, risk exposure, and industry practices.

Optimizely has identified several material impact, risks and opportunities related to Business Conduct in its upstream and downstream value chain, as well as in its own operations. These include anti-bribery and anti-corruption, and data privacy and security.

Risks: Key risks associated with business conduct include bribery and corruption exposure in commercial activities, particularly through third-party intermediaries; non-compliance with regulatory requirements related to data protection, competition law, and emerging AI regulation; weaknesses in internal controls; and ethical risks arising from the development and deployment of digital technologies. Third-party relationships represent an additional risk area where suppliers or partners may fail to meet expected ethical standards.

As the company expands globally and integrates AI-enabled capabilities into its products and operations, governance complexity and compliance expectations continue to increase.

Opportunities: At the same time, strong governance practices create opportunities to enhance stakeholder trust, strengthen competitive positioning, and support responsible innovation. Demonstrating robust ethical standards and responsible technology governance can differentiate the company in markets where trust and compliance capability are increasingly important to customers.

Policies related to Governance and Business Conduct

Optimizely maintains governance frameworks designed to promote ethical behaviour, regulatory compliance, and responsible business practices across its operations.

- **Code of Conduct:** cover ethics, legal compliance, data responsibility and whistleblowing procedures. Optimizely's Code of Conduct is mandatory for all employees, management team, and third-parties working on behalf of the company. The Code of Conduct is reviewed annually and updated accordingly to the changes in regulatory requirements, markets or stakeholder expectations.
- **Anti-Bribery and Anti-Corruption (ABAC):** Optimizely maintains a zero-tolerance approach to bribery and corruption. Supporting policies address: Gifts and hospitality, Conflicts of interest, Third-party due diligence, Anti-money laundering, Competition law compliance. These policies are particularly relevant given the company's global expansion and engagement with enterprise customers and public sector entities.
- **Ethical technology governance:** An internal cross-functional council oversees responsible AI, digital inclusion and data ethics policy.
- **Whistleblowing and Speak-Up Mechanisms:** The organisation operates an anonymous whistleblowing mechanism that allows employees and external stakeholders to report concerns without fear of retaliation. Reports are reviewed through established investigation and escalation procedures designed to ensure accountability and transparency.
- **Governance and risk management:** activities include policy development, employee training, internal controls, and monitoring processes intended to identify and mitigate potential misconduct risks. The company also maintains governance processes addressing data protection and information security, supported by recognised certification frameworks and technical safeguards.

Taking action on material impact, risks and opportunities

Optimizely undertakes a range of actions to strengthen governance effectiveness and promote ethical conduct. These include:

- Mandatory Code of Conduct training for employees and onboarding programmes for new hires
- Enhanced role-specific training for employees in higher-risk functions such as sales, procurement, and leadership for privacy and security awareness
- Ongoing monitoring of compliance risks and internal control effectiveness
- Operation and periodic review of whistleblowing mechanisms
- Integration of governance considerations into enterprise risk management processes
- Strengthening oversight of responsible AI deployment and emerging technology risks
- Supplier engagement initiatives to promote ethical standards across the value chain

VJ1 organisation to organization

Victoria Johnson, 2026-03-25T22:15:45.125

ESRS G1 – Business Conduct (cont.)



During 2025, the company continued to reinforce governance maturity through internal control enhancements, compliance monitoring, and integration of sustainability and governance considerations into strategic decision-making. The Group improved its EcoVadis sustainability rating and was awarded a “Committed” badge, reflecting continued progress in strengthening sustainability management practices, policies, and controls across environmental, social, and governance areas.

KPIs and Targets Related to Business

Optimizely monitors governance effectiveness through a range of indicators, including:

- Completion rates of mandatory employee training for privacy, security and regulatory compliance
- Whistleblowing channel usage or reported concerns
- Development of enhanced role-specific anti-corruption and anti-bribery training for employees in higher-risk functions including sales, procurement, and leadership, with implementation targeted ahead of the FY2027 mandatory reporting cycle
- Confirmed incidents of bribery or corruption
- Certification and audit outcomes related to governance and data security
- Compliance monitoring results

Following the implementation of the whistleblowing platform in 2024, the company's governance priorities for 2025 onwards focus on strengthening compliance effectiveness and organisational maturity.

Future objectives include:

- Maintaining high completion rates for mandatory compliance and regulatory training programmes
- Increasing employee awareness and confidence in internal reporting mechanisms
- Strengthening supplier governance and due diligence processes
- Enhancing oversight of AI-related risks and responsible technology governance
- Further integrating governance considerations into enterprise risk management

As governance maturity evolves, Optimizely intends to expand performance indicators and transparency related to business conduct metrics.

Governance Responsibility

Business conduct oversight is integrated into the company's governance and enterprise risk management framework, with responsibility shared across compliance, legal, human resources, and leadership functions. Senior management monitors ethics and compliance performance through internal reporting mechanisms, including whistleblowing processes and compliance monitoring activities. The Board of Directors reviews sustainability performance annually and retains oversight of progress against the Group's material targets.

Slide 16

- VJ1** Should these be bulleted? Same with below (won't let me highlight there for some reason)
Victoria Johnson, 2026-03-25T22:02:00.725
- LT2** Interested to know what you are referring to as ethics training.
Laura Thiele, 2026-04-11T16:12:32.176
- AM2 0** Ethics (quite broad here) - can be across Code of Conduct, anti-corruption, data privacy, employee rights policies, environmental etc which we have but we don't track rates of completion across all like we do for information security & compliance. Under EU's directive we are expected to expand these other areas for tracking and reporting.
Adelina Morina, 2026-04-15T14:10:22.927

ESRS G1 – Sustainable data privacy and security



Material impacts, Risks, and Opportunities

Data governance, privacy protection and information security represent highly material topics for Optimizely given the nature of the Group’s Digital Experience Platform (DXP) and the volume of customer and behavioural data processed across its solutions. The Group recognises that robust governance of data assets is essential to maintaining stakeholder trust, regulatory compliance, and long-term enterprise value.

Breaches or lapses in security could lead to operational disruption, legal liabilities, financial loss and reputational harm. Data security is not only essential for regulatory compliance and stakeholder trust – it is fundamental for responsible digital operations and ethical business conduct. Inadequate data protection may also indirectly affect human rights, including the rights to privacy.

Impact materiality: Double material assessment 2025 concludes that the impact materiality is **Very High**, as a breach or failure in data security could directly affect customers, end users, employees and partners.

Financial materiality has been assessed as **High** due to the potential impact of data incidents on enterprise value, regulatory exposure, and customer relationships.

Risks: From a risk perspective, potential impacts include unauthorised data access, cybersecurity breaches, system disruptions, and non-compliance with data protection regulations. Such events could result in financial penalties, contractual liabilities, operational interruptions, and reputational damage. Increasing regulatory complexity, evolving cyber threats, and dependency on cloud infrastructure providers also represent ongoing risk factors.

Opportunities: At the same time, strong data governance creates significant opportunities. Maintaining internationally recognised certifications and independently audited security controls enhances customer confidence, supports enterprise client procurement requirements, and strengthens the Group’s competitive positioning. Responsible deployment of AI-enabled capabilities, supported by privacy-by-design architecture and robust governance frameworks, further reinforces stakeholder trust and enables innovation while managing risk exposure.

Policies and actions related to Sustainable data privacy and security

Optimizely’s approach to security is rooted in four key values:

- **Worldwide Support:** Security measures are deployed globally to ensure consistent protection regardless of location.
- **Integrity:** We are trusted with mission-critical data and digital strategies, and we treat this responsibility with utmost seriousness.
- **Continuous Improvement:** Our security controls and programs evolve alongside shifting standards and threat landscapes.
- **Transparency:** Open communication about our security posture fosters trust and ensures stakeholder confidence.

Optimizely maintains a comprehensive information security and data governance framework supported by internationally recognised standards and independent third-party assurance. The Group operates an Information Security Management System certified under ISO/IEC 27001 and associated cloud security standards, including ISO/IEC 27017 and ISO/IEC 27018. Building on its 2024 objective, Optimizely achieved SOC 2 Type II attestation in 2025, evidencing the maturity and operational effectiveness of its control framework and strengthening governance over data security and risk management. Multiple products maintain SOC 2 Type II attestations, providing independent verification of the effectiveness of security controls.

BW1

The platform infrastructure is primarily hosted on hyperscale cloud environments, including Google Cloud, Microsoft Azure and other strategic providers, which maintain extensive compliance certifications. Optimizely operates under a shared responsibility model, leveraging infrastructure-level security controls while maintaining responsibility for application security, access management, and customer data governance.

Security governance includes structured risk assessments, access control mechanisms, encryption standards, incident response procedures, and secure software development lifecycle practices aligned with recognised industry frameworks. Continuous monitoring, vulnerability management, and penetration testing are implemented to identify and mitigate emerging threats.

During 2025, the Group continued to strengthen governance maturity through improved documentation, enhanced monitoring capabilities, and integration of security oversight into enterprise risk management processes. Responsible AI deployment considerations are incorporated into governance frameworks, with particular attention to data protection, fairness, and transparency.

Product / Service	ISO 27001	ISO 27017	ISO 27018	SOC 2 Type II	PCI DSS	Other / Notes
Optimizely One Platform (Core DXP)	✓	✓*	✓*	✓	—	Hosted on hyperscale cloud infrastructure
Content Management System (CMS)	✓	✓*	✓*	✓	—	Includes SaaS deployment environments
Commerce	✓	✓*	✓*	✓	✓ (where payment processing applies)	Payment-related scope dependent
Experimentation	✓	✓*	✓*	✓	—	Data processing controls covered under SOC
Campaign	✓	✓*	✓*	✓	—	Marketing automation platform
Optimizely Data Platform (ODP)	✓	✓*	✓*	✓	—	Customer data processing environment
Content Marketing Platform (CMP)	✓	✓*	✓*	✓	—	Collaboration and workflow tooling
Infrastructure Providers (Cloud)	Inherited	Inherited	Inherited	Inherited	Inherited	Shared responsibility model

* Certifications apply to services operating within the scope of the Group’s Information Security Management System and are subject to periodic external audits conducted by accredited certification bodies. Infrastructure-level controls are provided through hyperscale cloud providers under a shared responsibility model, with Optimizely maintaining responsibility for application security, access controls, and customer data governance.

Slide 17

BW1 [@Adelina Morina] in the 2024 report we talk about these SOC2 Type II attestations being a 2025 target and this suggests we achieved that so I think we should be more explicit in saying/celebrating that - this was a target and we achieved it. Gives more credibility to us being able to achieve other targets.

Ben Whitmarsh-Knight, 2026-03-18T19:31:34.858

AM1 0 [@Ben Whitmarsh-Knight] - great point. Added a sentence just before this and also highlighted on page 5

Adelina Morina, 2026-03-19T10:49:08.208

ESRS G1 – Sustainable data privacy and security (cont.)

Risk exposure varies across products depending on the volume and sensitivity of data processed and the degree of automation applied. Platforms that process large volumes of customer behavioural or personal data, such as Optimizely Data Platform and Commerce, present higher confidentiality and privacy risks. All SaaS services depend on hyperscale cloud infrastructure, resulting in inherent third-party dependency risks managed through contractual controls and supplier assurance mechanisms. AI-enabled features introduce additional considerations related to transparency, fairness, and automated decision-making, which are addressed through governance frameworks and oversight processes.

Risk Mapping G1 – By Product

Product / Service	Confidentiality Risk	Privacy Risk	Data Integrity Risk	Availability Risk	AI / Automation Risk	Third-Party Dependency
Optimizely One Platform	High	High	High	High	High	High
Content Management System (CMS)	High	Medium	High	High	Medium	High
Commerce	Very High	Very High	High	High	Medium	High
Experimentation	Medium	Medium	High	High	Medium	High
Campaign	High	High	Medium	High	Medium	High
Optimizely Data Platform (ODP)	Very High	Very High	High	High	High	High
Content Marketing Platform (CMP)	Medium	Medium	Medium	Medium	Low	High
Infrastructure (Cloud Providers)	High	High	High	Very High	Medium	—

Opportunities associated with Optimizely’s products primarily relate to strengthening customer trust, enabling data-driven decision-making, and improving operational efficiency. Platforms that process large volumes of customer data, such as Optimizely Data Platform and Commerce, provide significant opportunities to deliver advanced analytics, automation, and personalisation capabilities while supporting enterprise compliance requirements. The integration of AI-enabled functionality across the Optimizely One platform further enhances customer value by enabling intelligent orchestration and optimization of digital experiences. Infrastructure consolidation and cloud optimization initiatives also contribute to improved resource efficiency and emissions intensity reduction, supporting both operational and environmental objectives.

Opportunities Mapping G1 – By product

Product / Service	Customer Trust & Differentiation	Operational Efficiency	Data & AI Enablement	Regulatory Advantage	Sustainability Impact
Optimizely One Platform	Very High	High	Very High	High	Medium
Content Management System (CMS)	High	High	Medium	Medium	Medium
Commerce	Very High	High	High	High	Medium
Experimentation	High	High	Very High	Medium	Low
Campaign	High	Medium	High	Medium	Low
Optimizely Data Platform (ODP)	Very High	High	Very High	High	Medium
Content Marketing Platform (CMP)	Medium	Medium	Medium	Medium	Low
Infrastructure Optimization	High	Very High	Medium	Medium	Very High

Product innovation and operational improvements support the Group’s sustainability objectives by improving infrastructure efficiency, enabling better emissions measurement, and strengthening governance processes. AI-enabled optimization capabilities and infrastructure consolidation initiatives contribute indirectly to emissions intensity reduction, while data governance improvements support regulatory compliance and stakeholder trust. These connections reinforce the integration of sustainability considerations into business strategy and operational decision-making.

Opportunity Alignment with Sustainability Objectives G1

Opportunity Area	Sustainability Link	Related Targets
AI-enabled optimization	Efficiency and resource reduction	Scope 3 intensity reduction
Infrastructure consolidation	Energy efficiency and emissions reduction	Net Zero 2050
Supplier integration	Improved emissions data accuracy	Scope 3 measurement maturity
Data governance maturity	Risk reduction and trust	Certification maintenance
Responsible AI deployment	Ethical technology use	Governance improvement objectives
Automation of internal operations	Reduced operational waste	Efficiency improvement goals

VJ1 Don't want to mess up formatting here either but would balance the paragraph and title spacing between the tables to limit the odd whitespace

Victoria Johnson, 2026-03-25T22:07:13.066

ESRS G1 – Sustainable data privacy and security (cont.)

Risks and opportunities vary across products depending on data sensitivity, processing complexity, and automation capabilities. Platforms that process large volumes of customer and behavioural data, particularly Optimizely Data Platform and Commerce, present higher privacy and confidentiality risks but also provide significant opportunities for analytics-driven value creation and customer differentiation. Governance controls, including certified information security management systems, monitoring mechanisms, and access controls, are implemented to mitigate these risks while enabling innovation and performance improvements.

G1 – Product Risk, Opportunity and Control Mapping

Product / Service	Key Data Risks	Key Opportunities	Primary Control Mechanisms
Optimizely One Platform	Data confidentiality, AI decision risk, system availability	Agentic AI leadership, platform orchestration, enterprise differentiation	ISO-certified ISMS, SOC controls, access management, AI governance oversight
Content Management System (CMS)	Content integrity, unauthorised access, availability	Customer experience optimization, digital efficiency	Secure development lifecycle, authentication controls, monitoring
Commerce	Payment data exposure, transaction integrity, availability	Revenue enablement for customers, compliance positioning	Encryption, PCI controls (where applicable), monitoring and audit controls
Experimentation	Data accuracy risk, availability	AI-driven optimization, decision intelligence	Monitoring controls, data validation processes, secure infrastructure
Campaign	Personal data exposure, messaging integrity	Customer engagement analytics, automation	Access controls, privacy safeguards, monitoring
Optimizely Data Platform (ODP)	Personal data privacy risk, profiling risk, AI bias risk	Advanced analytics, personalisation, AI intelligence	Privacy-by-design architecture, encryption, governance oversight
Content Marketing Platform (CMP)	Collaboration data exposure, access risk	Workflow optimization, operational efficiency	Authentication, access management, monitoring
Infrastructure Optimization	Third-party dependency, availability	Cost efficiency, emissions reduction, scalability	Supplier assurance, contracts, monitoring, redundancy controls

Opportunities associated with Optimizely's products contribute directly to enterprise value through revenue growth, customer retention, and operational efficiency improvements. Advanced analytics and AI-enabled functionality support premium product offerings and differentiation in competitive markets, while infrastructure optimization contributes to margin improvement through reduced operational costs. Strong data governance and security controls also support enterprise customer procurement requirements, enabling access to regulated industries and large-scale clients.

VJ2

G1 – Product Opportunities and Revenue Linkage

Product / Service	Opportunity Theme	Revenue / Value Driver
Optimizely One	Agentic AI platform leadership	Platform adoption, enterprise contracts, premium features
CMS	Digital experience optimization	Subscription growth, customer retention
Commerce	Secure transaction enablement	Enterprise adoption, regulated-sector customers
Experimentation	Performance optimization insights	Upsell opportunities, customer ROI improvements
Campaign	Marketing automation efficiency	Cross-sell opportunities
ODP	Customer data intelligence	Data-driven services, advanced analytics features
CMP	Workflow efficiency	Platform ecosystem expansion
Infrastructure Optimization	Efficiency and scalability	Margin improvement, cost reduction

Slide 19

- VJ1** same here
Victoria Johnson, 2026-03-25T22:07:20.975
- AM1 0** All Optimisations changed to optimizations
Adelina Morina, 2026-03-31T10:52:24.964
- VJ2** optimisation to optimization
Victoria Johnson, 2026-03-25T22:16:25.108

ESRS G1 – Sustainable data privacy and security (cont.)

Targets related to Data privacy and security

Optimizely’s objectives in relation to data governance, privacy, and information security focus on maintaining robust protection of data assets, ensuring continuous compliance with recognised international standards, and strengthening governance maturity as regulatory expectations evolve. The Group aims to maintain relevant certifications and independent assurance mechanisms across its product portfolio, including ISO-certified information security management systems and SOC attestation programmes, while continuing to enhance the effectiveness of internal controls through ongoing monitoring and periodic external audits.

A key objective is to maintain the confidentiality, integrity, and availability of customer and operational data across all systems. The Group therefore seeks to prevent material data breaches and minimize security incidents through proactive risk management, vulnerability monitoring, and continuous improvement of access controls and detection capabilities. Incident response preparedness and recovery resilience remain ongoing priorities to ensure timely mitigation should events occur.

As the organisation expands its AI-enabled capabilities, Optimizely also aims to strengthen governance frameworks related to responsible AI deployment. This includes enhancing oversight of data protection considerations, fairness and bias mitigation, and transparency in AI-assisted decision-making processes. Over time, the Group intends to formalize additional governance indicators related to AI risk management as measurement maturity improves.

While standalone quantitative targets specific to data governance have not yet been publicly defined, performance is monitored through certification status, audit outcomes, compliance indicators, control testing results, and incident management metrics. The Group continues to evaluate opportunities to expand performance measurement and define additional indicators, including metrics related to access governance effectiveness, security control maturity, and risk response performance.

Through these objectives, Optimizely aims to sustain high standards of data protection and security governance, supported by certification frameworks, audit outcomes, and control monitoring, while supporting innovation, regulatory compliance, and long-term stakeholder trust.

The Group will continue to review target development in line with evolving regulatory requirements, including emerging AI governance frameworks and cybersecurity standards. As data maturity and monitoring capabilities improve, Optimizely intends to expand quantitative performance indicators to support greater transparency and accountability in future reporting cycles.

Performance on G1 – Governance Risk management and Internal control is disclosed in the table below:

Reference indices	Key performance Indicator	2023	2024	2025	Medium 2030	Long Term 2050	LT2
G1	Business Conduct						
	Code of Conduct Training and Whistleblowing ¹			Develop Tracking of	50%	100%	
	Mandatory Employee conducted Training for Privacy & Security %	97%	97%	96%	99%	100%	AM3
	HIPAA Awareness Training %		Not Reported	97%	99%	100%	
	Security Awareness Course for Finance %		Not Reported	93%	99%	100%	
	Security Awareness Course for HR %		Not Reported	100%	99%	100%	
	Anti Bribery & Corruption Training ²				50%	100%	
	Number of Bribery & Corruption, reported ³	0	0	0	0	0	
ES1	Sustainable Privacy and Data Security						
	Number of information security, reported ⁴	0	0	0	0	0	
	Number of Privacy incidents, reported ⁵	0	0	0	0	0	

¹ Refers to the % of employee Training on organization's Code of Conduct, including areas such as ethical behavior, conflicts of interest, harassment, or integrity standards.

² Refers to the % of employee Training on Anti Bribery & Corruption

³ Refers to the number of reported incidents involving actual or suspected acts of bribery, corruption, or improper influence, as defined by company policy and applicable anti-corruption laws.

⁴ Refers to the number of reported incidents involving actual or suspected breaches of information security, including unauthorized access, data breaches, cyberattacks, or loss of sensitive data.

⁵ Refers to the number of reported incidents involving the unauthorized access, disclosure, or loss of personal data, or any other violation of privacy policies or data protection regulations.

Slide 20

- LT1** We should discuss this. We have reported breaches here.
Laura Thiele, 2026-04-11T16:15:32.992
- LT2** Looks odd to go from 100 to 99
Laura Thiele, 2026-04-11T16:16:23.858
- AM3** [@Christopher Bayliss] - removed incidents reporting, not required for disclosures. We should focus on implementing tracking the training % on more specific mandatory topics to shift the focus on evidence of adequate procedures in place.
Adelina Morina, 2026-04-27T16:52:17.349

ESRS S1 – Own workforce

Material impacts, risks and opportunities

LT3

The material impacts of Optimizely's own workforce practices are assessed as **High** in impact materiality, and **Medium** in financial materiality. As a DXP company with more than 1,500 employees, Optimizely's workforce represents a critical driver of innovation, customer value delivery, and long-term business performance. As a global provider of digital experience technology, the Group relies on highly skilled employees across engineering, product development, customer success, and commercial functions. Workforce-related impacts therefore extend beyond internal employment conditions to include broader societal outcomes, particularly through the development and deployment of digital technologies and AI-enabled capabilities.

The financial implications, while not immediately revenue-impacting, are evident in long-term operational resilience, talent acquisition costs and brand reputation. Workforce-related risks, such as burnout, disengagement, low retention or inadequate skill development can lead to operational inefficiencies and reputational harm. Conversely, a thriving workforce presents opportunities for stronger innovation, higher productivity and enhanced client satisfaction.

Risks: The key risks include employee turnover in a highly competitive tech labor market, skills shortage in emerging markets – such as AI/ML, cybersecurity and the potential for disengagement or mental health challenges if workplace well-being is not adequately supported.

Opportunities: Investment in employee development, a supportive workplace culture, and leadership capability strengthens innovation and supports the Group's strategic transition toward AI-enabled products and services. Human-AI collaboration models, enabled through internal adoption of AI tools, also create opportunities to enhance productivity and job satisfaction while supporting organisational scalability.

Policies and actions related to Own workforce

Employee engagement

Optimizely regularly conducts confidential employee engagement surveys, which measure satisfaction, communication effectiveness, trust in leadership and sense of belonging. In addition to annual surveys, shorter pulse surveys are deployed to assess how employees are responding to change and organizational development. Results are analyzed at the local and global levels, informing action plans designed collaboratively between managers and teams. Insights gained help shape leadership training, benefits programs, and workplace culture initiatives.

Survey category	2025	2024	2023
My manager	87%	88%	89 %
Inclusion and Belonging	81%	82%	83 %
My wellbeing	76%	77%	78 %
My experience	73%	73%	71 %
Executive leadership	75%	78%	71%
AI-First Strategy	86%	N/A	N/A
Overall score	8/10	8/10	7/10

Summary of the result for 2025 is summarized in the table.

A defining feature of workforce development during 2025 was the integration of AI capabilities into daily operations. High levels of employee awareness and confidence in AI tools indicate successful adoption and demonstrate the organisation's readiness to operate in an increasingly automated environment.

Our employees increasingly see career and development opportunities within Optimizely. 89% understand AI-First Strategy and 86% feel confident using AI Tools.

Health and well-being

VJ1

Employee wellbeing remains a core priority for Optimizely, reflecting the company's belief that a supportive and healthy work environment is essential to sustained innovation, engagement, and organisational performance. As a digital technology business operating across multiple geographies, psychosocial wellbeing, workload management, and work-life balance represent the most relevant health considerations for employees.

During 2025, workforce wellbeing indicators remained stable compared with prior years, with employee survey results showing consistent perceptions of wellbeing and support. These results are particularly notable given the broader organizational transformation associated with the expansion of AI-enabled tools and evolving operating models. The stability of wellbeing indicators suggests that workforce support mechanisms and management practices have helped employees adapt effectively to change.

Optimizely provides employees with access to health and wellbeing resources, including healthcare coverage for eligible employees, employee assistance programmes, and wellbeing support initiatives. Managers play an important role in promoting wellbeing through regular check-ins, workload monitoring, and supportive leadership practices. Employee engagement surveys are used to monitor wellbeing trends and identify areas requiring attention.

Health and safety risks associated with physical workplace hazards remain low due to the nature of the company's operations, and no workplace incidents were reported during the reporting period. Optimizely continues to prioritise preventative measures and a culture of safety awareness across its offices and remote working environments.

Looking ahead, the company aims to continue strengthening wellbeing support as workforce expectations evolve, particularly in relation to digital work environments, hybrid working arrangements, and the integration of AI technologies into daily tasks.

Optimizely is committed to building a workplace where all talent can advance on merit. We track and report gender representation as an indicator of how effectively our talent development, leadership programmes, and workplace culture are creating equal opportunity across the organisation. These outcomes reflect the impact of our merit-based succession planning and development investment rather than preferential treatment of any group.

In 2025, women executive leaders represented 50% compared to 40% in 2024. Overall female employees 32% compared to 30% prior year.

Gender distribution *	2025	2024	2023
% C female employees	50%	40%	30%
% C male employees	50%	60%	71%
% C-Minus female emp	39%	42%	41%
% C-Minus male emp	61%	54%	55%
% C-Minus not disclosed	-	4%	-
% female employees	32%	30%	31%
% male employees	65%	66%	69%
% Undisclosed	3%	4%	-

AM4

* Data is collected on a voluntary, self-identified basis and is disclosed for ESRS regulatory reporting purposes. Workforce representation data disclosed in this section reflects our organisational composition as reported under ESRS S1 and applicable EU regulatory obligations and should be read in conjunction with the Regulatory Scope Notice on page [2]. For specification and definition of metrics please refer to page 26.

Slide 21

- VJ1** won't let me update prioritise to prioritize as well as organisational to organizational
Victoria Johnson, 2026-03-25T22:13:17.678
- LT2** Why do we reference 1500 ees? We have over 1650.
Laura Thiele, 2026-04-11T16:17:22.195
- AM2 0** We use Full Time employees and EOR as of Dec'25 but not Contractors, as per SF data shared by Nicole was 1570
https://epi-server99-my.sharepoint.com/:x:/g/personal/nicole_richards_optimizely_com/IQD
Adelina Morina, 2026-04-14T14:43:56.278
- LT3** Reword. It isn't semi annual plus pulse. It is annual survey with a pulse check. The pulse surveys aren't really measuring organizational development.
Laura Thiele, 2026-04-11T16:19:27.568
- AM4** [@Christopher Bayliss] Gender representation and added footnote
Adelina Morina, 2026-04-16T18:33:28.525
- CB5** edit on page 21 approved.
Christopher Bayliss, 2026-04-27T16:41:03.226

ESRS S1 – Own workforce (cont.)

Inclusion and Belonging

LT9

Optimizely recognises that inclusive workplaces — where all employees have equitable access to development, advancement, and belonging — are stronger, more innovative, and better positioned to serve our global customer base. Our approach to inclusion is grounded in equal opportunity and merit-based talent practices.

During 2025, a notable shift was observed in leadership composition. Female representation within executive leadership increased compared with prior years, reflecting the outcomes of our leadership development programmes, succession planning practices, and investment in talent advancement across the organisation. Overall workforce gender representation remained relatively stable, indicating that leadership improvements were primarily driven by internal development rather than changes in workforce composition.*

AM11

Employee engagement data also indicates a generally inclusive workplace culture, with survey responses reflecting positive perceptions of inclusion, belonging, and collaboration. Employee Resource Groups continue to play an important role in fostering community, supporting under-represented groups, and raising awareness across the organization.

Training and development initiatives are designed to support employees across different career stages, including leadership capability programmes that strengthen organisational performance and support a pipeline of talent from across the business.

The organisation continues to monitor workforce representation and engagement metrics to inform ongoing improvement efforts. Future priorities include strengthening inclusive leadership capability, supporting global talent development, and ensuring that equal opportunity principles remain embedded in recruitment, development, and promotion processes.

Sustainable Human Capital Development and Talent Retention

VJ3

Investing in employee development and capability building remains a strategic priority for Optimizely, reflecting the company’s reliance on skilled talent to support innovation and customer outcomes. Structured performance management processes, including regular Success Conversations and career development discussions, provide employees with opportunities to assess performance, identify development needs, and plan future career progression.

During the reporting period, participation in mentorship and coaching programmes continued to support leadership development and professional growth across the organisation. These initiatives aim to strengthen both technical and leadership capabilities while enabling internal mobility and career advancement opportunities.

Workforce metrics in 2025 indicate an increase in employee terminations compared with the previous year, resulting in lower overall retention levels. This trend reflects a period of organisational transition associated with strategic transformation initiatives, evolving skill requirements, and broader labour market dynamics affecting the technology sector. Despite these changes, employee engagement indicators remained stable, suggesting continued workforce commitment and organisational resilience during the transition.

BW1

Looking forward, Optimizely continues to prioritise capability development and workforce planning to ensure employees are equipped for the evolving demands of the digital experience platform industry, including the growing integration of AI-enabled tools and workflows across business functions.

Policies against Forced Labor and Human Trafficking

Optimizely is committed to upholding human rights and preventing any form of forced labour, modern slavery, or human trafficking across its operations and value chain. While the nature of the company’s activities as a digital technology provider presents limited direct exposure to such risks within its own workforce, the organization recognises that potential risks may arise indirectly through third-party suppliers and service providers.

The company maintains policies addressing labour rights and ethical conduct, including provisions within its Code of Conduct and supplier requirements that explicitly prohibit forced labour, involuntary servitude, and human trafficking. These standards apply to employees, contractors, and suppliers, and are supported through contractual obligations incorporated into supplier agreements.

Supplier due diligence processes are designed to identify and mitigate potential human rights risks, including labour-related concerns. Procurement and vendor management practices include supplier screening, contractual compliance requirements, and monitoring activities proportionate to the nature and risk profile of supplier relationships. Relevant employees involved in procurement, legal, and human resources functions receive guidance on recognising potential indicators of labour rights violations.

Although risks are considered relatively low within the company’s direct operations, Optimizely recognises the importance of continued vigilance across its global supply chain, particularly where services or products may involve multiple tiers of subcontracting or geographic regions with elevated labour risk. The company aims to strengthen responsible sourcing practices over time in alignment with evolving regulatory expectations and stakeholder requirements.



Optimizely was recognized and maintained its recognition as Great Place to Work in Vietnam, UK and Bangladesh offices. We will continuously work toward achieving this title across of our key global offices.

LT10

We are immensely proud of the 2025 Tech Award recognition showcasing positive change across our industry with high impactful Social Responsibility initiatives. We have dedicated resources provided to all employees on wellbeing, health care and retirement plans.

Governance Responsibility

Workforce-related topics are overseen by senior leadership responsible for people and organizational development, with operational implementation managed by human resources functions. Employee-related indicators and initiatives are monitored through management reporting processes and governance oversight structures.

* Certain disclosures — including workforce representation data — reflect EU regulatory obligations. Optimizely is an "equal opportunity" employer. All hiring, promotion, compensation, and employment decisions are made on the basis of merit, qualifications, skills, and business need, in compliance with applicable employment laws. Disclosed workplace data herein reflects the reportable composition of Optimizely’s workforce as measured at a point in time. Any benchmarks or forward-looking targets reflect Optimizely’s commitment to continue building appropriate workplace environments for all employees, but those benchmarks and targets do not constitute quotas, nor the basis of hiring or termination decisions

Slide 22

- BW1** [Adelina Morina] Why is this highlighted, I think this wording is fine?
Ben Whitmarsh-Knight, 2026-03-18T15:16:57.034
- AM1 0** [Ben Whitmarsh-Knight] - just wanted confirmation from Laura that this is ok, or if any change needed.
Adelina Morina, 2026-03-18T18:56:41.801
- VJ2** Would try to move this up a little to reduce the whitespace between the last paragraph and "Sustainable human capital..." title so it matches the spacing of the other pages

also noting my comment from the top about making sure headlines/subheads are uniform with capitalization
Victoria Johnson, 2026-03-25T22:09:23.342
- VJ3** organisational to organizational as well as recognising to recognizing
Victoria Johnson, 2026-03-25T22:17:34.153
- LT4** We no longer should use any where the phrase "diverse talent."
Instead we only use diverse experiences and diverse thought. It is discriminatory in the US to make any decisions based on race, sex, gender, national origin, etc.
Laura Thiele, 2026-04-11T16:20:56.200
- LT5** Need to rethink. Should not be calling attention to female representation. Let's discuss.
Laura Thiele, 2026-04-11T16:22:15.616
- LT6** We now have ONE ERG. Not plural
Laura Thiele, 2026-04-11T16:22:36.775
- LT7** Modify word under represented
Laura Thiele, 2026-04-11T16:23:10.673
- LT8** Some other wording in yellow is awkward. We should reword.
Laura Thiele, 2026-04-11T16:23:54.299
- LT9** No. Need to change. We should specify diversity of thought and experience. We don't want to look like that we have diversity targets or we recruit/promote/develop based on protected characteristics. It is all about the "Experience" of people and not about their gender. It is illegal in the US to select women over male or to give training only to women.
Laura Thiele, 2026-04-11T16:26:12.370
- LT10** No. This is not true. "select office ok."
Laura Thiele, 2026-04-11T16:27:25.868
- AM11** [Christopher Bayliss] - paragraph on gender composition and again added footnote
Adelina Morina, 2026-04-16T18:35:23.481
- CB12** edits on page 22 approved.
Christopher Bayliss, 2026-04-27T16:41:17.664
- CB13** Footnote on this page 22 approved.
Christopher Bayliss, 2026-04-27T16:41:33.414

ESRS S2 – Workers in the value chain

Material impacts, risks and opportunities

Impact materiality: The 2025 double materiality assessment identified workers in the value chain as a topic of **High** impact materiality due to Optimizely's reliance on a global network of suppliers, including cloud service providers, IT hardware vendors, professional services firms, and outsourced support providers. While these workers are not directly employed by the company, procurement and vendor management decisions can influence labour conditions, working practices, and human rights outcomes within the supply chain. Potential impacts relate primarily to labour rights protection, fair working conditions, occupational health and safety, and ethical employment practices, particularly in lower-tier supply chains or regions with elevated labour risks.

Financial materiality: was assessed as **Medium**, reflecting indirect but relevant exposure to reputational risks, regulatory developments related to supply chain due diligence, and customer expectations regarding responsible sourcing practices. Emerging legislation, including EU supply chain due diligence requirements and national regulations, may increase compliance obligations over time. Failure to manage labour-related risks in the value chain could affect customer trust, commercial relationships, and procurement eligibility, particularly with large enterprise or public-sector clients.

Risks: Key risks include insufficient visibility into multi-tier supplier structures, potential labour rights violations among subcontractors, and inconsistent application of labour standards across geographies. As the company operates in a digital services environment, risks are generally lower than in manufacturing industries but remain relevant where outsourced services or hardware procurement are involved.

There is an increasing expectation from regulators, customers, and civil society for companies like Optimizely to ensure due diligence extends beyond direct employees. Failure to act could result in reputational damage or disqualification from public or large enterprise procurements.

Opportunities: arise from strengthening supplier governance frameworks and aligning procurement practices with international labour standards. Enhanced due diligence and supplier engagement can improve risk management, support customer confidence, and strengthen Optimizely's positioning as a responsible technology provider. Integrating sustainability considerations into supplier selection processes also supports long-term value creation and resilience across the value chain.

Policies and Actions related to Workers in the value chain

Optimizely takes a preventive and risk-based approach to uphold labor rights in our value chain. We expect our suppliers, partners, and contractors to adhere to our Code of Conduct for Business Partners, which includes minimum standards aligned with the ILO Core Conventions, UN Guiding Principles on Business and Human Rights, and OECD Guidelines for Multinational Enterprises.

During 2025, Optimizely continued to strengthen supplier engagement and due diligence processes, including risk assessments for key supplier categories and the integration of sustainability considerations into vendor onboarding and renewal activities. The company is progressively enhancing its approach to supplier risk management, with a focus on improving transparency and monitoring capability over time.

Although direct labour risks are considered relatively limited due to the nature of the company's operations, Optimizely recognises the importance of maintaining responsible sourcing practices across its global supply chain. Future improvements will focus on strengthening due diligence maturity and aligning supplier governance with evolving regulatory expectations.

Targets related to workers in the value chain

Performance related to workers in the value chain is monitored through indicators disclosed in the report's KPI tables, including supplier compliance incidents and labour-related concerns identified through governance processes. No material labour rights violations within the value chain were identified during the reporting period.

Future priorities include strengthening supplier governance maturity, improving risk visibility across supplier tiers, and enhancing monitoring mechanisms where relevant. As measurement capabilities evolve, Optimizely intends to expand performance indicators related to supplier sustainability and responsible sourcing practices.

Governance Responsibility

Responsibility for value chain labour considerations is embedded within procurement, vendor management, and compliance functions. Oversight is integrated into broader supplier governance and risk management processes, with sustainability considerations increasingly incorporated into supplier engagement activities.

ESRS S3 – Consumers and end users

Material impacts, risks and opportunities

VJ1

Optimizely's Digital Experience Platform (DXP) enables organizations to orchestrate, personalize, and optimize digital interactions at scale. As a platform deeply embedded in customer journeys, Optimizely engages indirectly with millions of consumers and end-users through its enterprise clients. While the company does not typically interface with end-users directly, it has a significant responsibility in shaping how consumer data is processed, personalized, and protected across its ecosystem.

Optimizely's products enable organisations to create, manage, and optimize digital experiences for their own customers and users across websites, applications, and digital platforms. Through these technologies, the company indirectly influences how millions of individuals access online information, services, and commercial interactions. As a result, the design, functionality, and governance of Optimizely's products can contribute to both positive and negative societal impacts for consumers and end users.

Impact materiality: was assessed to be **Medium**. Through its Digital Experience Platform (DXP), Optimizely enables organisations to create, personalise, and optimize digital interactions across websites, applications, and online services. While the company typically interacts directly with enterprise clients rather than individual consumers, its technologies indirectly influence how millions of end users access digital content, interact with services, and experience online environments.

Potential impacts relate primarily to data protection, privacy rights, digital inclusion, transparency of automated decision-making, and responsible use of personal data. Platform design and governance choices can enable positive outcomes, such as improved accessibility and user experience, or create risks if misused by clients.

Financial materiality: was assessed to be **Medium**, reflecting exposure to regulatory requirements related to data protection and AI governance, contractual obligations to enterprise customers, and the importance of trust in technology adoption. Failure to maintain strong governance could result in reputational damage, regulatory penalties, or loss of customer confidence.

Risks: Key risks include potential data privacy breaches, inadequate consent management implementation by clients, algorithmic bias within personalisation features, and lack of transparency regarding automated decision-making processes. Increasing regulatory complexity and stakeholder expectations regarding responsible technology deployment further elevate these risks.

Opportunities: exist to strengthen competitive positioning by embedding privacy-by-design principles, responsible AI governance, and transparency tools into the platform. Supporting customers in meeting regulatory requirements and delivering trustworthy digital experiences enhances customer loyalty and long-term value creation.

Policies and actions related to Consumers and end users

In response to these risks and opportunities, Optimizely has implemented a range of policies and technical measures. The company maintains a comprehensive data privacy and protection program, overseen by a dedicated Data Protection Officer and supported by legal and security teams. Privacy by Design is embedded in product development, and the platform incorporates features to support secure data transmission, encryption, and access controls. The company actively helps clients implement consent management mechanisms and configure user data preferences in line with regional data protection laws. Through integrations with consent management platforms, clients are empowered to respect and operationalize user consent at scale. Optimizely also provides tools that allow for greater user control, including support for opt-in and opt-out frameworks, data subject access and deletion requests, and user preference management. These features help clients provide end-users with transparency and control over how their data is collected and used.

On the front of algorithmic transparency and AI ethics, Optimizely is building a responsible AI governance framework. This includes internal standards to ensure fairness, bias testing in machine learning models, and transparency around the use and function of AI tools. The company is committed to ensuring that personalization engines, recommendations, and content optimization algorithms operate in ways that are fair, inclusive, and explainable. Human oversight remains integral, with AI-powered systems subject to review and adjustment by clients to reflect their own values and regulatory requirements. Ethical design reviews are integrated into the product development lifecycle to evaluate AI-powered features for potential impacts, biases, and alignment with societal and legal expectations.

Monitoring efforts are underway to track key indicators such as the adoption of privacy and consent tools, the number of AI models tested for bias, and feedback from clients on issues related to trust and data ethics. Optimizely incorporates client feedback into ongoing platform development and participates in industry forums to ensure alignment with evolving expectations and best practices.

Looking ahead, Optimizely aims to publish a Responsible AI Charter to formalize its commitments and principles around ethical AI use. It also plans to introduce new features such as AI explainability dashboards, expand developer resources on privacy and compliance, and enhance training programs to help clients use the platform responsibly. These actions reflect Optimizely's broader commitment to enabling ethical, transparent, and user-centric digital experiences across its ecosystem.

Targets related to Consumers and end users

The company maintains service level commitments for platform availability of up to 99.9% and operates continuous monitoring processes to support reliability and performance. Security controls include encryption, multi-factor authentication, vulnerability testing, and incident response procedures aligned with recognised standards. Customers are notified of significant incidents in accordance with contractual obligations.

Future priorities include strengthening responsible AI governance, enhancing transparency tools, and continuing to maintain high standards of data protection and platform reliability.

Governance Responsibility

Oversight of consumer and end-user considerations is integrated across product development, security, compliance, and customer experience functions. Governance processes support monitoring of risks related to data protection, platform reliability, and responsible technology deployment.

VJ1 organisations to organizations

Victoria Johnson, 2026-03-25T22:18:05.386

ESRS S4 – Affected communities

Material impacts, risks and opportunities

While Optimizely operates primarily as a B2B technology company with a global client base, the company acknowledges its broader social impact on communities—both where it operates and where its employees and customers are located. Though the direct operations of Optimizely are digital and do not typically result in large-scale environmental or social disruption to physical communities, the company recognizes its responsibility to contribute positively to the societal fabric through community engagement, volunteering, and philanthropic giving.

In the context of **impact materiality**, affected communities represent a **moderate** area of importance. While operational risks to communities are minimal due to the company’s digital and remote-first footprint, Optimizely’s ability to support communities through its platform, people, and purpose is increasingly important to stakeholders and employees alike. The **financial materiality** is assessed to be **Medium**, as community investment has long-term reputational and cultural significance, helping to attract talent, enhance employee engagement, and build goodwill with local and global stakeholders.

Risks: Optimizely’s digital products influence how communities access and experience the internet. This creates both risks and opportunities tied to inclusivity, accessibility, and ethical technology. Key risks include the exclusion of marginalized users if accessibility is not embedded in product design, which can lead to regulatory non-compliance (ADA, EU accessibility standards), client dissatisfaction, and reputational damage. Additionally, if algorithmic bias is not managed within AI-powered personalization tools, it can reinforce inequities and erode trust. Community engagement efforts that are disconnected from core business strategy may also be viewed as inauthentic.

Opportunities lie in proactively embedding accessibility and inclusive design into the platform, enabling clients to deliver better and more equitable digital experiences. This positions Optimizely as a trusted partner in responsible innovation. Strategic community investment and volunteering—such as through the "Optimizely Gives Back" program—also boost employee engagement, support talent retention, and enhance brand reputation. Finally, leading on ethical digital practices allows Optimizely to influence industry standards and scale its positive societal impact.

Policies and actions related to Affected communities

One of the most significant ways Optimizely contributes to affected communities is through its commitment to inclusive design and digital accessibility. Communities historically marginalized or underrepresented in digital spaces—including individuals with disabilities, older adults, and those in underserved regions—face barriers to accessing online content and services. Optimizely is working to help close that gap by embedding accessibility principles into its core product development process and by equipping clients with tools and guidance to create inclusive digital experiences. By viewing accessibility and inclusive design not as features but as foundational principles, Optimizely continues to align its product development with its broader social purpose—creating technology that not only powers personalized experiences but also opens doors for communities around the world.

In 2025, Optimizely made a focused effort to expand its positive community impact through both structured volunteering initiatives and charitable donations. Under the “Optimizely Gives Back” initiative, employees around the world participated in community service events, with strong support from leadership and team-level coordination. Volunteer activities spanned a wide range of causes, including environmental clean-up efforts, STEM education mentorship, and support for underserved youth. Employees were offered paid volunteer time to participate in these initiatives, aligning with the company’s values of inclusion, empathy, and social responsibility.

Alongside volunteerism, Optimizely made targeted charitable donations in 2025, emphasizing equity in education, digital inclusion, and humanitarian support. Notably, the company supported non-profit partners focused on bridging the digital divide, enabling access to technology and digital literacy for students and communities with limited resources. Donations were also directed toward disaster relief organizations in response to global humanitarian crises, as well as local charities nominated by employees. The Group contributed an additional \$20k matching donations with total donations more than doubled from previous year.

These actions were guided by a belief that meaningful corporate citizenship extends beyond compliance and includes proactive support for social well-being. The company aims to ensure that its presence—whether physical or virtual—adds value to the communities it touches. This includes elevating employee voices in identifying local causes, engaging with global non-profit partners, and applying its core competencies, such as digital expertise, to benefit social initiatives. To measure its impact, Optimizely tracks participation rates in volunteer programs, total donation amounts, and the number of organizations supported globally.

The table to the right summarizes results from Opti gives back 2025. Over the course of the year, 738 volunteers came together across 30 organized events, contributing a total of 2,600 volunteer hours to causes ranging from hunger relief and blood donation to youth education, digital inclusion, and humanitarian aid. The success of these initiatives was made possible by the leadership and dedication of over 40 volunteer event captains, who coordinated logistics, rallied colleagues, and brought energy to every project. On top of these, a total of \$42,966 USD (tracked in BrightFunds) were donated. In addition to company-sponsored events, many employees also made individual volunteer contributions throughout the year, giving their time and skills to causes close to their hearts, a reflection of the time, effort, and care invested by our teams in supporting communities around the world.



Looking forward, Optimizely plans to expand the scope of “Optimizely Gives Back” by dedicating a global month of service, deepening long-term partnerships with social impact organizations, and integrating community engagement goals into broader sustainability objectives. These initiatives reflect Optimizely’s recognition that even as a technology provider, its people and platform can play a meaningful role in building more inclusive, resilient, and empowered communities.

LT2

Targets related to Affected Communities

Optimizely has not set any public targets.

Governance Responsibility

Community-related initiatives and impacts are coordinated through sustainability and operational functions, with oversight integrated into the company’s sustainability governance framework. Management monitors community engagement activities and related risks as part of broader stakeholder considerations.

Performance disclosure related to Social topics are found below:

Slide 25

LT1 No. We have a month of service. We are not introducing a day of service.
Laura Thiele, 2026-04-11T16:30:29.994

LT2 Who is doing this?
Laura Thiele, 2026-04-11T16:30:52.205

AM2 0 No concrete nor commitment. Just forward looking / future aspirations
Adelina Morina, 2026-04-28T15:12:39.637

Ref indices	Key performance Indicator	2023 FTE	2024 FTE	2025 FTE	Medium 2030	Long Term 2050
S1	Employees					
	Total global employees	1,454	1,563	1,570		
	% employees in US		33%	32%		
	% employees in EMEA		31%	29%		
	% employees in APAC		36%	39%		
	Employee inclusion & belonging	<p>The following workforce composition data is disclosed in fulfillment of ESRS S1 requirements applicable to our EU-based reporting entity. Data is collected on a voluntary, self-identified basis and is used solely for regulatory reporting purposes. No employment decision at Optimizely is made on the basis of race, ethnicity, or any other protected characteristic.</p>				
	Anti-discrimination incidents ¹	0	0	0	0	0
	Workplace conduct and inclusion incidents ²	0	0	0	0	0
	% female employees	31%	30%	32%		
	% male employees	69%	66%	65%		
	% gender, not specified	-	4%	3%		
	% Ethnicity					
	White		26%	22%		
	Minority		6%	8%		
	Undisclosed		68%	70%		
	Gender by Job Category					
	% female leadership C-suite ³	30%	40%	50%		
	% male leadership C-suite	70%	60%	50%		
	% female line managers C-Minus ⁴	41%	42%	39%		
	% male line manager C-Minus	55%	54%	61%		
	% gender, not specified C-Minus	2%	4%	0%		
	% female in tech roles	25%	23%	27%		
	% male in tech roles	70%	72%	71%		
	% Undisclosed in tech roles			2%		
	Employee engagement ratio					
	Share your voice survey %	90%	88%	86%	95%	95%
	Employee Engagement overall score	7/10	8/10	8/10	9/10	9/10
	Employee Wellbeing					
	Number of work-related ill health ⁵	0	0	0	0	0
	Days lost due to injury ⁶	0	0	0	0	0
	% Employee healthcare cover and resources for Full Time EEs	100%	100%	100%	100%	100%
	Ratio of the annual total compensation for the highest paid individual, to the median annual total compensation for all employees	Not reported	5.65	6.1		

AM3

LT2

¹ Refers to reported and substantiated cases involving allegations of discrimination based on race, gender, age, disability, sexual orientation, religion, or other protected characteristics, as defined by company policy and applicable laws.

² Refers to reported behaviours or actions that create a hostile or inequitable work environment—such as bias, harassment, or exclusion—based on protected characteristics including race, gender, age, disability, or sexual orientation

³ C-level refers to executive leadership roles such as CEO, CFO, and other "Chief" titles.

⁴ C-minus refers to direct reports to C-level executives, typically senior leaders one level below the C-suite.

⁵ Refers to the number of reported cases of illness or adverse health conditions determined to be caused or aggravated primarily by work-related activities or exposures, as recorded through internal health and safety reporting systems.

⁶ Refers to the total number of calendar days employees were unable to work due to work-related injuries, starting from the day after the incident until the employee is able to return to full duties.

Slide 26

BW1 Do we need any narrative on the plans to reduce this number because it's very high? Or an explanation for why it's so high.

Ben Whitmarsh-Knight, 2026-03-18T19:27:43.736

AM1 0 [@Ben Whitmarsh-Knight] which number, your comment highlights the whole page

Adelina Morina, 2026-03-19T17:32:11.234

BW1 1 Declined to answer ethnicity

Ben Whitmarsh-Knight, 2026-03-19T18:09:48.361

AM1 2 Under General Data Protection Regulation, ethnicity is:
"special category personal data"

This puts it in the highest sensitivity tier.

What that means in practice:

You can only collect it if:

it is voluntary

there is a clear purpose (e.g. DEI monitoring)

it is properly protected

and, crucially, no negative consequence for non-response

So not much we can do about it:

You cannot require employees to answer

You must allow "prefer not to say"

Adelina Morina, 2026-03-19T18:17:01.964

LT2 This decline to answer is misleading bc we don't even allow to ask in many countries.

Laura Thiele, 2026-04-11T16:32:01.678

AM2 0 Changed to "Undisclosed"

Adelina Morina, 2026-04-15T10:37:40.698

AM3 [@Christopher Bayliss] - last section on all indicators, same message to clarify disclosure only for the purpose of ESRS S1 and employment decisions are made based on protected characteristics

Adelina Morina, 2026-04-16T18:39:51.648

Reference indices	Key performance Indicator	2023	2024	2025	Medium 2035	Long Term 2050
S4	Consumer and End User					
	% Targeted suppliers Acceptance of Optimizely's Code of Conduct ⁸	Not reported	Not reported	63.3%	70%	90%
	% Targeted suppliers covered by a sustainability assessment ⁹	Not reported	Not reported	63.3%	70%	90%
	User compliance & ethical use violations, cases reported ¹	0	0	0	0	0
	Intensity of tCO ₂ e for every \$1,000 revenue		0.031	0.027	-30%	-50%
ES2	Sustainable Human Capital Development					
	Retention rate ²	80.1%	91.2%	82.91%	95%	95%
	Voluntarily turnover ³	19.9%	8.8%	10.78%		
	Overall Employee Turnover % ⁴	13.83%	13.00%	17.17%		
	Career Progression – % of employees receiving Mentorship and Coaching programs	Not reported	46%	25%	50%	50%
	% completion rate for the latest cycle of success conversations (performance reviews)	99%	99%	99%	99%	99%
S2	Workers in the value chain					
	Partners number on noncompliance with labor laws, case reported ⁵	0	0	0	0	0
	Suppliers number on noncompliance with labor laws, cases reported ⁶	0	0	0	0	0
	Customer number on noncompliance with labor laws, cases reported ⁷	0	0	0	0	0
	Child or forced labor incidents reported from Value chain	0	0	0	0	0

¹ Refers to the number of reported cases involving user violations of Optimizely's compliance policies or ethical use standards, including misuse of the platform, prohibited content, or breaches of terms of service

² Refers to the percentage of employees who remain employed at Optimizely over a defined period, calculated annually.

³ Refers to the percentage of employees who choose to leave the organization on their own accord within a given period, excluding layoffs, retirements, or terminations initiated by the company.

⁴ Refers to the percentage of all employees who left the organization during a given period, including both voluntary and involuntary departures

⁵ Refers to the number of reported cases where business partners were found to be noncompliant with applicable labor laws or regulations, including issues related to wages, working hours, child labor, or workplace safety.

⁶ Refers to the number of reported cases involving suppliers found to be noncompliant with labor laws or standards, including violations related to fair wages, working conditions, working hours, child or forced labor, or occupational health and safety.

⁷ Refers to the number of reported cases where customers were identified as being noncompliant with labor laws or standards, including issues such as unfair wages, unsafe working conditions, excessive working hours, or use of child or forced labor.

⁸ Refers to the Percentage of targeted suppliers considered high and critical vendors who have acknowledged the supplier code of conduct during onboarding or re-assessment

⁹ Refers to the Percentage of targeted suppliers considered high and critical vendors who have been assessed on sustainability practices during onboarding or re-assessment