

SUSTAINABILITY AND CORPORATE RESPONSIBILITY REPORT 2024

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About this report

This sustainability report encompasses the Group report, Epsilon Group New Holdings Ltd and its subsidiaries. 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).

It is our intention to be transparent in our approach, hence we have included data where it is available and Key Targets and KPIs summary is provided in table format. Overtime we intend to increase the data we report as well as to closely measure and monitor our KPIs on a regular basis to disclose our progress towards our sustainability journey.

Strategy and targets



“It’s all about innovation and execution”

- Alex Atzberger, CEO

Our Values

“At Optimizely, we believe that true innovation isn’t just about optimizing digital experiences - it’s about optimizing for a better, more sustainable future. Our commitment to Environmental, Social, and Governance (ESG) principles is rooted in the same bold thinking that drives our business. We take ownership of the challenges ahead, work together to create lasting impact, and embrace diversity and inclusion as essential drivers of progress. By holding ourselves to high standards and continuously improving, we are not only building better solutions for our customers but also a better world for future generations.” - Alex Atzberger, CEO

Our strategy

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.

Our goals

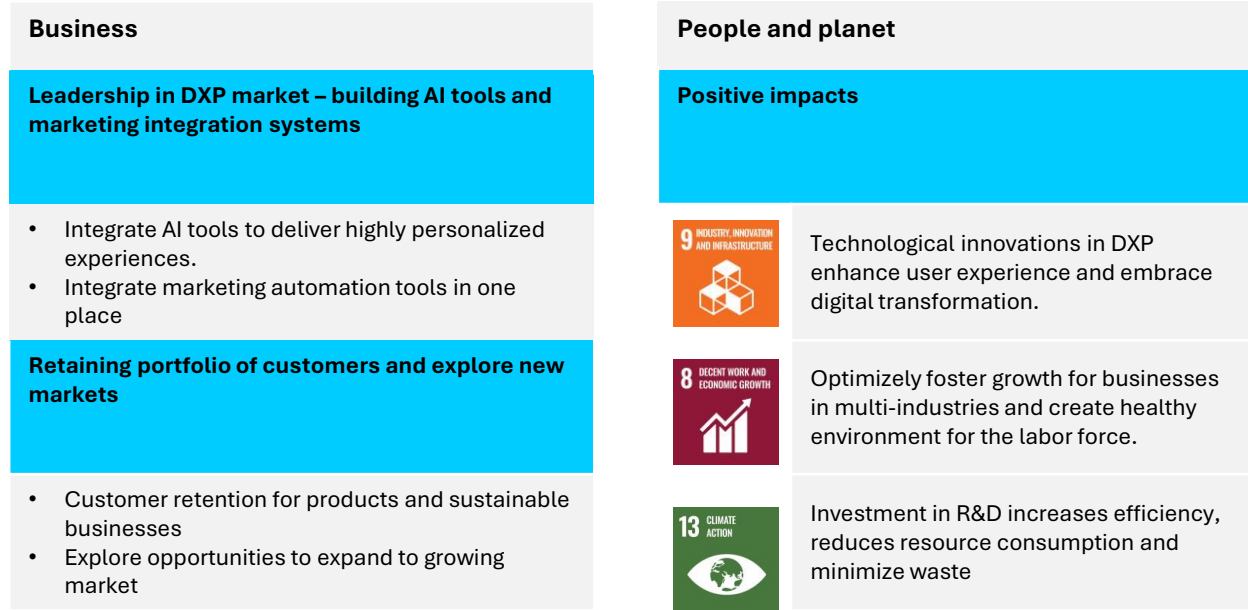
Our company commits to maintain Net-zero scope 1 and scope 2 emissions through 2030, and to measure and reduce its scope 3 intensity emissions from a 2024 base year”.

Our sustainability approach - Business, people and planet

Our commitment to sustainability is rooted in our vision to create long-term values for all our stakeholders, our customers, employees and the planet. We recognize that true sustainability is about balancing business growth with the well-being of our people and the environment. To this end, our sustainability approach focuses on three core pillars: **business, people and**

the planet. These pillars align with our values and will guide us as we continue to innovate, lead in the Digital Experience Platform (DXP) market and operate as a responsible corporate.

These three pillars are summarized in the Figure below:



Business – innovation for sustainable future

At Optimizely, we aspire to build the world’s best DXP, one that is customer-centric and driven by technological innovation. Our vision for the business is to deliver solutions that empower our customers to achieve and sustain their business growth.

The integration of AI tools is helping businesses deliver highly personalized content, predict customer behavior and optimize their user journey. Moreover, we are building our capabilities to include marketing automation tools, allowing businesses to manage, track, and optimize marketing campaigns and customer interactions all in one place. We will continue to invest in R&D to optimize our platforms to reduce resource consumption, increase efficiency and minimize waste.

We build a sustainable business model that creates value not just for our shareholders but for society at large. This includes responsible supply chain management, ethical business practices and transparent reporting on our sustainability goals and progress.

People – empowering and investing in talents

Our people are at the heart of our business. We recognize that fostering a diverse, inclusive and engaged workforce is essential to driving innovation and maintaining our leadership position in the DXP space. We strive everyday to create a working environment where our employees thrive, make

meaningful contributions and have the opportunity to growth professionally and personally.

To support this, we focus on attracting, retaining and nurturing top talent across our global offices. We continue to build a stronger employer brand, investing in continuous learning and development through our training programs and leadership development. We offer comprehensive wellness programs and mental health support.

Planet – reducing our carbon footprint

As a technology company, we have a responsibility to reduce our environmental footprint by creating sustainable business operations. This includes reducing our carbon emissions, conserving natural resources and mitigating our environmental impacts of our product development and delivery, data centers, office operations and business travel.

Our sustainability approach is not just a set of goals; it is our ongoing commitment to building a better future for our business, people and the planet. At Optimizely, we believe that by focusing on these three core pillars, we can create a sustainable and thriving organization that drives positive changes across industries and communities. Through innovation, investment in talent, and responsible environmental practices, we are confident that we can achieve our vision of becoming the world’s best DXP while fostering a sustainable, inclusive and ethical future.

Our sustainability approach – Tracking and Reporting our progress

Optimizely formed an ESG committee last year with a commitment to develop sustainability initiatives which are aligned with our three core pillars and provide accurate, transparent sustainability disclosures. To ensure accountability and transparency, we will track and report on our sustainability initiatives and performance. This includes publishing annual sustainability reports, setting measurable targets and engaging with stakeholders to assess the effectiveness of our efforts. Our progress will be evaluated through key performance indicators (KPIs) across three areas

Environment, Social and Governance.

As we report here, we are on track on several areas, but not in every area. We therefore are mobilizing to accelerate progress in areas where we are not yet on track. We will also continuously seek feedback from employees, customers, and other stakeholders to ensure that we are meeting our sustainability objectives and making the necessary adjustments to stay on track.

Performance on Strategy and Targets

Summary of our targets and performance on strategy and targets are summarized in the figure below.

Environment

Target: Optimizely is committed to achieving Net Zero greenhouse gas (GHG) emissions across its entire value chain (Scope 1, 2, 3) by 2050. As part of this long-time goal, we have set interim targets to drive measurable progress. This includes reducing Scope 3 emissions intensity – such as those from our Cloud infrastructure and data centers – by 30% by 2030. We are also working towards 100% electricity from renewable sources for all of our global offices by 2035. Additionally, we aim for 100% of our suppliers to meet defined sustainability criteria by 2030, reinforcing our commitment to emission reduction throughout our supply chain and ensure that we achieve our

sustainability goals in all aspects of our operations.

Performance: We began measuring our GHG emissions in 2023. While we’ve made progress in gaining a comprehensive understanding of our environmental impact, we’ve not yet managed to develop science-based targets. To address this, we are looking into partnering with a third-party expert to support us in developing and implementing a scientifically grounded methodology for estimating emissions and setting realistic, actionable targets along our journey to Net Zero.

A key component of our emission strategy is to collaborate closely with our Cloud infrastructure partners – Microsoft Azure, Google, AWS among the biggest and most strategic partners –

Goals and performance targets		Base year	Target year	2024 Performance
Environmental	<div><div>13</div><div>CLIMATE ACTION</div><div></div></div> <div>Climate change mitigation Net Zero GHG emissions across the value chain, covering scope 1, 2 and 3</div>	2023	2050	Research on the development of SBTi in progress
	<div><i>Emission reduction Scope 3 Measure, monitor and reduce Scope 3 emissions intensity (Cloud infrastructure, Data centers) by 30% by 2030</i></div>	2023	2050	
	<div><i>Energy performance</i> 100% renewable electricity by 2035 across global offices</div>	2024	2035	On track
	<div><i>Supply chain management</i> 100% suppliers to meet sustainability criteria by 2030</div>	2024	2030	In progress
Social	<div><div>3</div><div>GOOD HEALTH AND WELL-BEING</div><div></div></div> <div>Health and safety 0 work accident, 0 lost workday incidents Great place to work in all global offices</div>	2024	2030	0 work-related accident Great place to work in Vietnam, Bangladesh, UK
	<div><div>5</div><div>GENDER EQUALITY</div><div></div></div> <div>Diversity and inclusion 35% share of women among all employees, line managers and executive positions</div>	2020	2030	30% women employees, total 40% women, executives 42% women, line managers
Governance	<div><div>16</div><div>PEACE, JUSTICE AND STRONG INSTITUTIONS</div><div></div></div> <div>Ethics and compliance Strengthen and enhance Ethics and Compliance. Implement an anonymous whistleblowing system</div>	2024	2030	Anonymous whistleblowing system in place

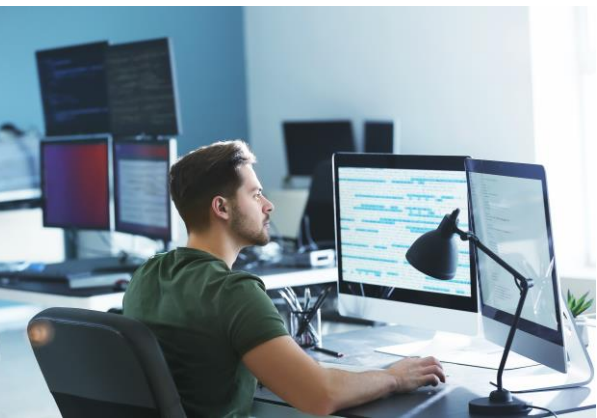
to develop plans that will help us move to 100% cloud-based data management. This transition will play an important role in helping us moving closer towards achieving our 30% Scope 3 emission reduction target.

We are already making progress towards our renewable electricity goals. A phased approach is being taken to ensure that all our offices operate on 100% electricity from renewable sources. To achieve this, we've partnered with office lessors who prioritize sustainability – using energy-efficient systems, sourcing electricity from certified renewable providers, and implementing water conservation and waste management practices.

To achieve our goal of 100% of suppliers meeting defined sustainability criteria by 2030, Optimizely has implemented a structured and proactive approach to supply chain management through the Supplier Code of Conduct, focusing on ethical practices, transparency and environmental responsibility. Our procurement processes are looking into integrate sustainability assessments and certifications, ensuring new and existing suppliers are aligned with our values. We conduct regular self-assessment tools and evaluations to track compliance and progress.

Social

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



To drive transparency and accountability, we are looking into enhancing data collection on supplier emissions, especially our Cloud infrastructure suppliers, and work closely with them to co-develop solutions that reduce environmental impact. These collective efforts ensure we make measurable progress towards a more sustainable and responsible supply chain by 2030.

- Ensuring and maintaining zero workplace incidents or accidents
- Achieving recognition as a Great Place to Work across all global offices by 2030
- Increasing the representation of women to 35% across total employees, line managers and executive leadership roles.

Performance: In 2024, Optimizely continued to uphold its strong commitment to health and safety, with no work-related incidents reported throughout the year. This achievement was supported by regular training sessions on workplace environment and the implementation of measurable improvement actions. 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 diversity and inclusion, women accounted for 30% of the total workforce in 2024, maintaining the percentage in the previous year. Notably, we exceeded our goals in leadership presentation, with women comprising 42% of line managers and 40% of executives being women.

Governance

Target: In 2024, Optimizely set out to strengthen its governance structure by enhancing ethics and compliance practices across all areas of operations. A key short-term target was to implement an anonymous whistleblowing system to improve transparency and trust. The long-term governance targets include promoting ethical business practices, enforcing anti-bribery and anti-corruption measures as well as ensuring robust data protection and privacy standards across all regions.

Performance: To support these goals, Optimizely implemented several strategic initiatives throughout the year. A secure and anonymous whistleblowing channel **Optimizely**

Ethicspoint was successfully developed and launched in Q4 2024, designed to provide a safe and confidential communication channel between employees and Optimizely.

This system ensures that employees, partners and external stakeholders can report concerns or potential violations without fear of retaliation, reinforcing a culture of openness and accountability.

Optimizely maintains a zero-tolerance policy towards bribery and corruption, regardless of form or context, in line with international standards and regulations.

Organization-wide training sessions were delivered to raise awareness of ethical responsibilities and reporting mechanism. In parallel, Optimizely enhanced its data governance and privacy frameworks, aligning with global regulations such as ISO and GDPR, and ensuring responsible data use across our digital experience platform solutions. ESG risks, including data security, compliance, and ethical concerns, were integrated into the company's broader enterprise risk management processes.

Optimizely successfully launched the anonymous whistleblowing system in 2024, achieving its short-term governance target. This system has strengthened the company's internal communication channels and enabled employees to voice concerns securely and confidently. Ethical awareness and engagement have increased through training, clear policy communication, and leadership reinforcement. The company also made progress toward its long-term governance goals by maintaining high standards of data protection and continuing to institutionalize anti bribery and anti corruption practices – with 0 reported cases in 2024. These achievements underscore Optimizely's commitment to responsible governance, ethical leadership and sustainable growth in the DXP industry.

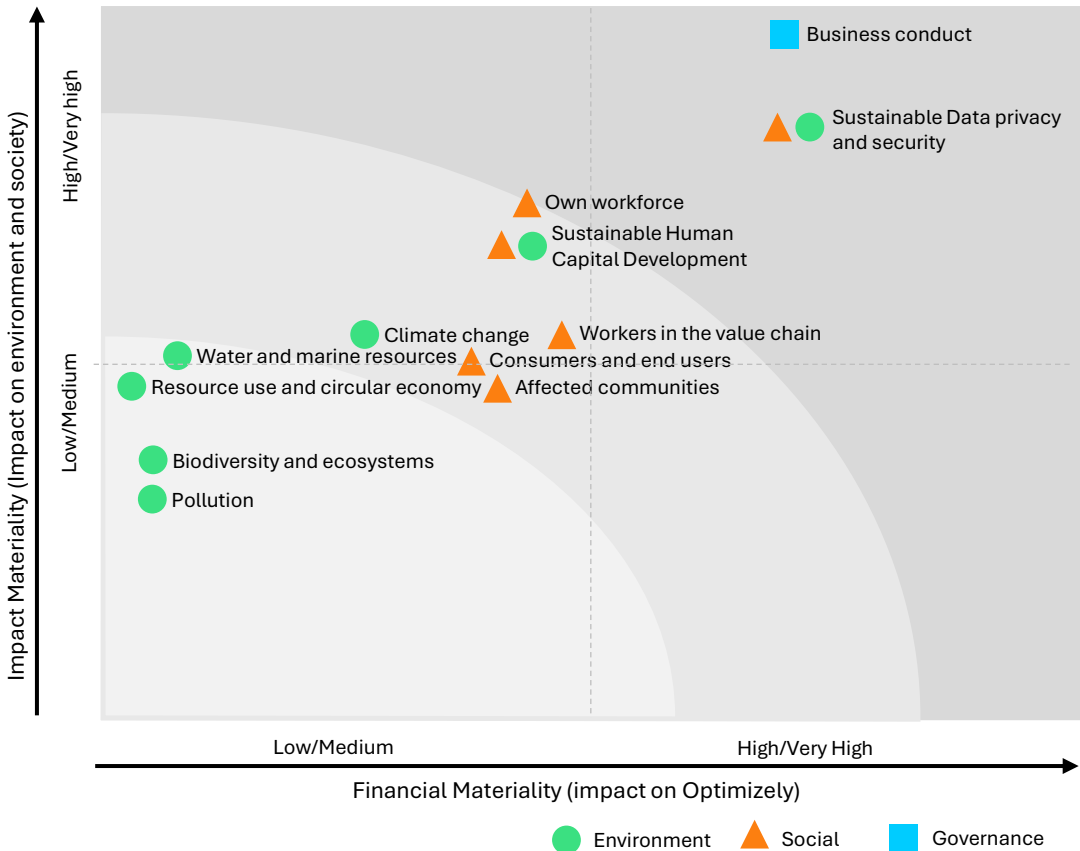


Double materiality assessment

Alignment with CSRD and relevancy to the DXP industry

As part of its alignment with the Corporate Sustainability Reporting Directive (CSRD), Optimizely conducted the first double materiality assessment in 2023. In 2024, the materiality assessment was reviewed. We identify and prioritize sustainability topics that are most relevant to the business and

its stakeholders. This assessment reflects both impact materiality – Optimizely’s impact on the environment and society at large, and financial materiality – the impact of sustainability matters on Optimizely’s financial performance, position, and prospects. The double materiality assessment is illustrated in the matrix below:



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.

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
Sustainable Data privacy and security	Very high	Very high	Fundamental to customer trust, product integrity and regulatory compliance (GDPR, CCPA)
Sustainable Human Capital Development	High	High	Diversity, Equity and Inclusion (DEI) drives innovation, talent attraction and long-term reputation

Key material topics and assessment outcomes (cont.)

Material topics	Impact materiality	Financial materiality	Description
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	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	<p><i>Data privacy, consent and user control:</i> As a digital platform provider handling vast amount of behavioral and personal data, ensuring transparent and secure data handling is critical.</p> <p><i>Algorithmic Transparency & AI Ethics:</i> DXP personalization tools use AI and algorithms, ensuring these are not biased or opaque is essential for trust and compliance</p>
Resource use and circular economy	Medium	Low	<p><i>Cloud Infrastructure Resource Efficiency:</i> Cloud services and data centers consume vast amount of energy, water, and hardware resources. Vendor selection and optimization strategies can reduce indirect environmental impacts.</p> <p><i>IT Equipment Life Cycle management:</i> 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.</p>
Water and Marine Resources	Medium	Low	<p><i>Water use by Cloud infrastructure providers:</i> Cloud data centers can consume significant water for cooling, affecting freshwater availability. Optimizely's reliance on third-party cloud service providers create an indirect impact</p> <p><i>Office water use</i> is limited but still considered in sustainability practices.</p>
Biodiversity and Ecosystems	Medium	Low	<p><i>Indirect impact via Cloud infrastructure providers:</i> Large-scale data centers can have impacts on local land use, water systems and ecosystems. Vendor due diligence is of great importance.</p>
Pollution	Medium	Low	<p><i>Air emissions from Cloud infrastructure:</i> Optimizely relies on third-party data centers, which may emit pollutants during energy generation, especially if fossil-fuel-based.</p> <p><i>E-waste and office waste:</i> 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.</p>

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



ESRS E1 – Climate change

Climate-related Impacts, Risks, and Opportunities

The 2024 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

Taking action on material impact, risks and opportunities

Optimizely is committed to achieving Net Zero GHG emissions across its entire value chain by 2050, with medium-term targets set to reduce Scope 1, 2, 3 emissions intensity by 30% by 2035. A phased net zero strategy has been rolled out across core business functions, including Product development and delivery, cloud infrastructure, office operations and marketing activities.

Scope 1 emissions, primarily from office operations, are being addressed through the selection of energy-efficient office lessors. For example, the new Stockholm office is powered by 100% electricity from renewable sources and incorporates rainwater and snow reuse systems.

Scope 2 emissions, driven by in-house data centers are being mitigated by server consolidation and plans for full cloud migration. Optimizely also engaged in discussions with cloud service providers and data center providers to increase shares of renewable energy use.

Scope 3 emissions, which accounts for 99.9% of total emissions, arise mainly from purchased services, business travels and e-waste. Business travel emissions by 64% in 2024, amounting to 1,801 tons, most probably due to improved measurement accuracy. Future efforts are focused on sustainable travel tools, Navan, which was implemented during the first half of 2024 and travel policy refinement. An e-waste management program is under development, emphasizing recycling and employee education.

Throughout 2023 and 2024, Optimizely undertook initiatives aimed at identifying and developing a robust, science-based methodology for emission accounting to ensure accurate and reliable GHG measurement. This will support data-driven decision-making and performance tracking across global entities.

Key actions to reduce emissions include a strategic reduction of Optimizely's in-house data center providers from six to four, with a medium-term goal to fully migrate product development and delivery to cloud services provided by the major Cloud infrastructures in the market – Microsoft Azure, Google Cloud, Amazon Web Services – all of which have verified net zero roadmaps. Additionally, the acquisition of NetSpring allowed for the consolidation of data analytics warehousing, reducing e-waste and fragmented storage.

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.

The company continues to integrate sustainability KPIs into its internal systems and its 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.

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

tCO ₂ e	2023	Base year 2024	% change from base year	Target	
				Medium 2030	Long term 2050
Scope 1 GHG emissions					
Gross Scope 1 GHG emissions	14	0	-100%	0	0
Scope 2 GHG emissions					
Gross local-based Scope 2 GHG emissions	400	116	-71%	-30%	-50%
Gross market-based Scope 2 GHG emissions	156	143	-8%	-30%	-50%
Scope 3 GHG emissions					
Total gross indirect Scope 3 GHG emissions	6,665	12,680	53%	-30%	-50%
3.1 Purchased goods and services	5,505	9,128	60%	-30%	-50%
3.2 Capital Goods	Not reported	45	-		
3.3 Energy	94	26	-72%		
3.5 Electronic Waste	Not reported	0.2	-		
3.6 Business travel	1,066	1,801	59%	-30%	-50%
3.7 Employee commuting	Not reported	1,571	-		
3.8 Upstream	Not reported	108	-		
Total GHG emissions	7,079	12,796	-	-30%	-50%
Total energy Kwh	Not reported	460,170.13	-		
Total energy Gigajoule	Not reported	1,656.61	-		
tCO ₂ e per 1,000 USD	Not reported	0.031	-		
Intensity target tCO ₂ e per 1 Mil USD revenue	Not reported	31		-30%	-50%

Given that 99.9% 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.

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

The 2024 double materiality assessment identified resource use and circular economy as a material topic under both impact and financial perspectives.

Impact materiality was assessed as **Medium**. Optimizely’s operations indirectly contribute to resource depletion and electronic waste, primarily through cloud infrastructure and IT equipment use and disposal. As a digital business, the company holds a responsibility to mitigate these impacts through sustainable procurement, cloud optimization and product life cycle management.

Financial materiality was determined to be **Low**. While resource efficiency has limited immediate financial consequences, long-term inefficiencies in data infrastructure and regulatory exposure on e-waste management may increase costs and compliance burdens.

Risks:

Increasing energy demand from digital services, potential compliance risks related to e-waste disposal in certain jurisdictions.

Opportunities:

Operational cost-savings through optimization, innovation in data consolidation (NetSpring) and strengthen brand reputation.

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.

Taking action on material impact, risks and opportunities

Optimizely purchases Cloud services from the most reliable on the market, whose environmental performance is verifiable. Moreover, collaborations with certified e-waste recyclers are active across our global offices. For example, in relation to the Stockholm office move in December 2024, since the office was downsized, most of the electronic devices and equipment were given away to employees and the rest was disposed of responsibly through a specialist vendor.

Targets related to resource use and circular economy

Optimizely has not set any targets regarding Cloud infrastructure resource efficiency and IT equipment Lifecycle Management.

ESRS E3 – Water and marine resources

Impacts, Risks, and Opportunities

The 2024 double materiality assessment identified water and marine resources as a material topic under both impact and financial perspectives.

Impact materiality was assessed as **Medium**. As a digital company, Optimizely’s direct water consumption is limited through its office operations across the globe. However, indirect impact arise from reliance on third-party Cloud infrastructure providers and data centers that use water-intensive cooling systems, especially in water-stressed regions. As a digital business, the company holds a responsibility to mitigate these impacts through sustainable procurement, cloud optimization and product life cycle management.

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 ESG ratings.

Risks:

Reliance on data centers located in water-scarce regions, for example, parts of the US and Europe.
Potential impact of e-waste and device lifecycle on marine systems, particularly in cases of improper disposal in emerging markets.

Opportunities:

Strategic partnership with cloud vendors based on environmental performance can enhance reputation with ESG-conscious clients and employees.

Policies related to water and marine resources

Optimizely acknowledges the growing importance of responsible water stewardship in a digitalized world. Although not a heavy water consumer itself, the company’s environmental impact is linked to upstream activities – primarily from data center operations and cloud infrastructure.

Our policies on water and marine resources focus on responsible vendor selection, efficient office practices and monitoring of indirect water usage through third-party data sharing with cloud services providers.

Taking action on material impact, risks and opportunities

Data centers and Cloud vendors: Optimizely is consolidating its physical data center footprint to reduce indirect water usage. Vendor selection for Cloud services providers is based on environmental performance based on best practices in water efficiency, such as Google Cloud and Microsoft Azure reporting high adoption of water-free cooling and recycled water use.

Water efficiency in office operations are being addressed through selection of high-performed lessors. For example, Stockholm office implemented a rainwater and snow collection system used for flushing, reducing potable water consumption.

Targets related to water and marine resource efficiency

Optimizely has not set any public targets.

ESRS E2 – Pollution

Material impacts, Risks, and Opportunities

The 2024 double materiality assessment identified Pollution as a material topic under both impact and financial perspectives.

Impact materiality was assessed as **Medium**. While Optimizely does not engage in direct pollutant-intensive operations, indirect pollution can occur through the lifecycle of IT equipment, upstream cloud infrastructure (including e-waste) and supply chain activities.

Financial materiality was determined to be **Low**. 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: Enhance ESG score through proactive pollution management.

Policies related to Pollution

As a software-focused company, Optimizely's operations are inherently low polluting. However, the company is aware of its indirect pollution impact through air emissions, electronic waste, and hazardous material management in data centers and supplier chain.

Policies on pollution prevention focus on:

- Managing the life cycle of IT equipment to minimize hazardous e-waste.
- Supply chain management to minimize pollutants in their operations.
- Preventing air pollution from business travel and logistics associated with events and marketing campaigns.

Taking action on material impact, risks and opportunities

Business Travel emissions: A new business travel system (Navan) was implemented to track and report actual emission, including air pollutants where available. Employees are encouraged to prioritize virtual collaboration and low-emission transportation modes, supported by internal guidelines and incentives.

E-waste and IT equipment: Optimizely has initiated development of a centralized e-waste management program targeting reuse and recycling as well as internal employee education.

Supply chain and Cloud providers: Optimizely procurement team plans to implement annual ESG screening which includes air emission control, proper disposal of hazardous materials and reporting compliance.

Targets related to pollution

Optimizely has not set any public targets.

ESRS E4 – Biodiversity and ecosystems

Impacts, Risks, and Opportunities

The 2024 double materiality assessment identified Biodiversity and ecosystem as a material topic under both impact and financial perspectives.

Impact materiality was assessed as **Low to Medium**. While Optimizely doesn't directly operate in biodiversity-sensitive areas or engage in land-use activities, indirect impacts occur through the company's use of digital infrastructure, IT equipment and supply chain, particularly in raw material extraction, data center locations and e-waste handling.

Financial materiality was determined to be **Low**. 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:

Reputational exposure from supply chain actors involved in unsustainable extraction or land degradation, indirect habitat impact from data center operations.

Opportunities: Enhanced brand value and alignment with clients focused on biodiversity protection.

Policies related to Biodiversity and ecosystems

Optimizely recognizes the importance of preserving biodiversity and ecosystem services, even in the context of a digital business. Our approach focuses on:

- Minimizing indirect impacts on ecosystems via responsible supplier engagement and sustainable procurement practices.
- Promoting awareness and responsible behavior across employees, especially in procurement, travel and office operations.

Taking action on material impact, risks and opportunities

Cloud infrastructure and data centers: Optimizely prioritizes partnerships with hyperscalers that have demonstrated clear biodiversity policies, including conservation initiatives near data center sites.

E-waste and life cycle management: Rollout of centralized e-waste recovery and recycling program contributes to preventing harmful leakage into natural environments.

Targets related to Biodiversity and ecosystems

Optimizely has not set any public targets.

ESRS G1 – Business Conduct

Governance underpins Optimizely's ability to operate responsibly, manage risk and create long-term value. As a DXP providers serving 10,000 of businesses across the globe, our ecosystem touches sensitive data, influences millions digital user experiences on a daily basis and supports enterprise transformation across multiple sectors. Robust corporate governance is therefore critical not only to regulatory compliance but to stakeholder trust and ethical innovation.

We align with international governance codes, industry best practices and our internal code of conduct. Our framework covers Board oversight, executive accountability, business ethics, anti-bribery and anti-corruption, stakeholder engagement, data governance as well as responsible AI.

Material impacts, Risks, and Opportunities

The 2024 double materiality assessment identified Business conduct as a material topic under both impact and financial perspectives.

Impact materiality was assessed as **Very High**. Governance practices have direct and indirect impacts on society, the economy and the environment. Ethical lapses, weak oversight or poor transparency can enable corruption, erode public trust in digital ecosystems and affect human rights through misuse of data and biased algorithms. Governance is thus materially significant due to:

- Our influence on digital infrastructure used by both public and private institutions.
- The potential society impact of unethical or non-transparent AI and data practices.
- Expectations for fairness, accountability and anti-corruption in global operations.

Financial materiality was determined to be **Very High**. Ethical breaches could result in client attrition, fines, litigation and loss of market access, particularly when dealing with enterprise clients, organizations, governmental entities with strict due diligence protocols.

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: Legal and financial repercussions from governance or compliance failures. Reputational damage due to ethical lapses or transparency issues.

Opportunities: Strengthening investor, customer and stakeholder trust and confidence through responsible business conduct and governance. Gaining a competitive advantage by embedding ethical digital practices. Enhancing operational resilience through better internal control systems and ethical leadership.

Policies related to Governance and Business Conduct

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.

Ethical technology governance: An internal cross-functional council oversees responsible AI, digital inclusion and data ethics policy.

Taking action on material impact, risks and opportunities

Optimizely works to maintain the highest standard of professional integrity and ethical behavior across all Optimizely operations, aligned with international regulations and industry best practices. The Code of Conduct serves as the foundation for expected behavior, fostering a culture of integrity, respect, accountability and responsible innovation. The Code is reviewed and updated to reflect the evolving ethical risks and challenges relevant to a global technological company in the DXP industry, including data privacy, AI, cybersecurity and third-party management.

To ensure compliance of the Code, Optimizely implemented a multi-step approach. All new hires are required to complete a mandatory onboarding program within their first 30 days of employment and affirm their understanding and acceptance of the Code. Existing staff are encouraged to review the Code regularly. Mandatory training were enhanced for specific functions, covering sales and procurement staff who involve in client and vendor engagements, as well as product and engineering teams who are guided on responsible product development and ethical AI usage. Line managers and senior leaders are required to participate in specialized training on ethical leadership and appropriate behavior.

To ensure accessibility and transparency, the Code of Conduct is available publicly on Optimizely's intranet and website. Employees and stakeholders are encouraged to report any suspected misconduct through designated reporting channels, which includes a secure anonymous whistleblowing system implemented in Q4 2024.

Anti-bribery and anti-corruption (ABAC)

Corruption, bribery, and other unethical business practices hinder social and economic progress by undermining fair competition, eroding trust in institutions, and diverting resources away from public and community needs. They pose material financial risks and reputational consequences for Optimizely, given that the company engages with a wide array of stakeholders, including clients, vendors, public authorities and service providers. As Optimizely expands its global footprint into high-growth markets such as UAE, Vietnam and Bangladesh, the risk exposure increases due to varying levels of regulatory enforcement, difference in business culture, and increased reliance on third-party intermediaries. In such environment, there may be heightened vulnerability to facilitation payments, conflicts of interest and unethical procurement or hiring practices. These risks carry not only potential legal and financial consequences, including fines, contract cancellations and reputational damage, but also the risk of exclusion from client tenders – especially from multinational clients with stringent compliance requirement. For a technological company like Optimizely, whose success depends heavily on trust, transparency and long-term partnerships, any instance of unethical business practices could severely undermine stakeholder confidence and impair access to growth markets or public sector contracts.

Business conduct Code policies and corporate culture against bribery and corruption

Optimizely has zero-tolerance policy toward bribery, corruption and any other unethical business practices, regardless of form or context, in every market where Optimizely operates. The company's Code serves as a foundational guide for ethical decision-making and responsible risk management across all operations. It outlines clear expectations for employee behavior, including a strict prohibition against bribery, corruption and financial misconduct, and requires the disclosure of potential conflicts of interest as well as adherence to fair competition laws. To support and operationalize these principles, Optimizely has implemented a set of complementary policies covering key areas such as anti-corruption, gifts and hospitality, third-party due diligence, anti-money laundering and antitrust compliance. In parallel, the policies for Business Partners communicates the company's expectations for integrity, transparency and lawful conduct throughout its value chain.

ESRS G1 – Business Conduct (cont.)

Reporting channels for Compliance and Misconduct concerns

All compliance concerns are expected to be reported to Optimizely, so that they will be assessed and addressed to identify, prevent and remediate misconduct and gaps in internal control.

To ensure accessibility, security and comfort in raising sensitive issues, the company has implemented a secure, anonymous whistleblowing system via *Optimizely Ethicspoint* available to all employees globally as of Q4, 2024. The system is available 24/7 and is operated by NAVEX, a trusted third-party provider specializing in ethics and compliance reporting. The channel offers two reporting methods: an online reporting portal and a dedicated telephone hotline. The platform is hosted on Ethicspoint secure servers and independently of Optimizely's website or intranet. The system also enables two-way anonymous communication, allowing Optimizely to ask follow-up questions or provide updates on the case.

Moreover, Optimizely provides several other reporting channels for employees, business partners and stakeholders to raise concerns:

- Human Resources for any concerns regarding employee behavior or personal conflicts.
- Chief Financial Officer for concerns about financial or audit matters.
- General Counsel for legal and compliance-related matters
- Direct manager or local HR representatives are also acceptable reporting channels

Regardless of the reporting channel, all allegations are reviewed and handled with confidentiality, fairness and diligence. Reports are assessed by Optimizely internal team and when necessary, lead to investigations and corrective measures.

Optimizely strictly prohibits any forms of retaliation against individuals who report concerns in good faith. Our internal policies and training emphasizes non retaliation and ethical behavior as cornerstones of our corporate culture.

To enhance trust and transparency, we will regularly review the effectiveness of our reporting mechanisms and may disclose aggregated data on reporting cases and outcomes in our annual sustainability reports.

Number of reported cases during 2024 was 0. More disclosures can be found in the summary table after the Data privacy and security chapter.

ESRS G1 – Sustainable data privacy and security



Material impacts, Risks, and Opportunities

Data privacy and security is a significantly material topic for Optimizely due to the nature of the digital services we provide to customers across industries and sectors. As a DXP company operating globally, we manage amounts of sensitive customer, user and operational data.

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 digital sustainability and ethical business conduct. Inadequate data protection may also indirectly affect human rights, including the rights to privacy.

Double material assessment 2024 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 material is assessed to be **Very High**, especially considering growing global enforcement of data protection laws such as GDPR, CCPA and potential penalties or business losses.

Risks: Cyberattacks including ransomware, DDoS, phishing targeting cloud infrastructure and customer data. Insecure data handling practices by third-party vendors. Regulatory non-compliance risks in jurisdictions with strict data privacy and cybersecurity laws. Business interruption due to system compromise or breach.

Opportunities: Strengthen customer trust and brand reputation by demonstrating robust data protection and proactive risk management. Competitive advantage through industry certifications (ISO 27001, SOC 2 Type II). Improved operational resilience via modern DevSecOps and cloud-native security models.

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.

Since 2022, Optimizely has made substantial progress in enhancing its data privacy and security framework. The company consolidated its SOC 2 Type I and PCI compliance efforts into a unified Global Policy Program, demonstrating institutional capability in safeguarding customer data across products and geographies.

To further embed a culture of data security, Optimizely conducts comprehensive information security awareness programs for all employees, customers and partners. These programs are not limited to training but are designed to cultivate a shared responsibility for privacy and security, reinforcing adherence to data protection laws (GDPR, CCPA, LGPD). In line with continuous improvements, Optimizely is currently pursuing a SOC 2 Type II attestation, expected to be achieved by early 2025. This initiative was part of our commitment to maintaining best-in-class operational controls and validating the effectiveness of those controls over time. The Type II assessment will be conducted in accordance with attestation standards set by the **AICPA**, focusing on security, availability, processing integrity, confidentiality, and privacy.

Governance of information security is managed through the **Security Governance Board (SGB)**, which includes senior management and external directors. The SGB convenes biannually to review strategic risks, mitigation plans, and emerging threats. Additionally, Optimizely conducts annual **control self-assessments** using a risk-based methodology, with results informing high-risk remediation plans that are reviewed and approved by the SGB.

Management is accountable for monitoring system performance and executing internal controls, while the **Board of Directors** holds ultimate oversight, ensuring the integrity of governance processes.

Process and access to data

At Optimizely, responsible data management is central to our mission of enabling secure and impactful digital experiences. We build and optimize website content, digital experimentation, and personalization solutions that are trusted by global customers and experienced by millions of end users. In delivering these services, we process customer and user data—often through third-party integrations—which requires rigorous safeguards to uphold data privacy, integrity, and protection across our ecosystem.

We recognize that our ability to securely process, store, and access data, including personal and behavioral information, is critical to maintaining the confidence of our stakeholders. To this end, we operate under a robust data governance and risk management framework. The Security Team performs regular risk assessments in line with ISO 27005:2018 guidelines for information security risk management. Identified top risks are escalated to the Security Governance Board, which reviews, prioritizes, and tracks the implementation of risk treatment plans. This governance model ensures accountability and ongoing improvements to our security posture.

Optimizely upholds strict compliance with global data protection regulations, including the General Data Protection Regulation (GDPR) and the California Consumer Privacy Act (CCPA). Our global privacy policy applies to all entities and functions within the organization and governs how we collect, store, process, and share data. Our solutions are designed with data protection by design and by default, and are backed by third-party certifications such as PCI DSS, confirming the integrity of our technical and organizational controls.

We also extend our expectations of data protection to our entire value chain. We require our customers, partners, and suppliers to treat personal and sensitive data responsibly and lawfully, in accordance with applicable privacy laws. This includes clear communication on data collection, lawful processing, secure data storage, and restricted sharing. Furthermore, we expect our partners to protect the personal data of Optimizely's employees and stakeholders, using it only for legitimate and authorized business purposes.

Internally, we foster a privacy-first culture through ongoing employee training and security awareness campaigns. We continue to invest in improving data governance, implementing secure access protocols, and maintaining detailed data mapping and classification practices. These measures help ensure that all customer and user data handled within our systems is safeguarded, and that any access to such data is controlled, documented, and monitored.

Acquisition of NetSpring – a step toward enhancing data privacy and security

In 2024, Optimizely took a major step in strengthening our data privacy and security architecture through the acquisition of NetSpring, a modern data warehouse native analytics platform. This strategic investment allows us to consolidate data environments, enhance internal control over data flows, and reduce the operational and security risks associated with fragmented systems and legacy storage tools. NetSpring provides a unified platform for secure data storage, governed analytics, and controlled access, which not only streamlines data operations but also ensures higher standards of compliance with privacy laws and internal policies. By owning and managing more of our own data infrastructure, we reduce dependency on external platforms and improve visibility into how data is used and protected across the business.

Our commitment to ethical data stewardship is fundamental to our trust-based relationships with users, customers, and partners—and remains a key pillar in our long-term sustainability strategy.

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

Targets related to Data privacy and security

Optimizely is committed to setting ambitious yet achievable targets for data privacy and security to strengthen trust and resilience in its operations as a global digital experience (DXP) provider. In the short term, by the end of 2025, Optimizely aims to successfully complete a SOC 2 Type II attestation, building on the groundwork laid by its SOC 2 Type I achievements. This includes demonstrating the operating effectiveness of internal controls related to security, availability, and confidentiality.

Alongside this, the company will standardize and implement updated data governance policies globally, ensuring consistent data classification and retention practices. All employees will be required to complete annual information security and privacy training, with the goal of achieving full participation to foster a company-wide culture of security awareness. In addition, Optimizely will integrate data privacy incident reporting into its NAVEX whistleblowing platform, ensuring anonymous and secure channels for employees to raise compliance concerns. Data Protection Impact Assessments (DPIAs) will be conducted annually for high-risk systems, particularly those operating in emerging markets.

Looking ahead to the medium terms, Optimizely targets strengthening third-party data risk management by assessing all critical external vendors handling personal or sensitive data through risk-based evaluations. The company will require strategic partners to sign Data Processing Agreements aligned with its internal privacy policy. The Security Governance Board (SGB) will be expanded to include cross-functional members from product development and customer experience teams and will be responsible for reviewing an internal “Security and Privacy Risk Landscape Report” published annually. Another key medium-term objective is to reduce the number of customer- or partner-reported security incidents by 30% compared to the 2024 baseline, by improving proactive threat detection and resolution mechanisms.

By 2030, Optimizely seeks to align with globally recognized privacy frameworks and uphold the highest standards of ethical data stewardship. This long-term goal reflects the company’s commitment to continuous improvement, transparency, and operational excellence in managing data privacy and security across its global value chain.

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

Reference indices	Key performance Indicator	2023	2024	Medium 2030	Long Term 2050
G1	Business Conduct				
	Number of breaches of Code of Conduct, reported ¹	0	0	0	0
	Mandatory Employee conducted Training for Privacy & Security %	97%	97%	99%	100%
	Number of Bribery & Corruption, reported ²	0	0	0	0
	Whistleblowing, reported ³	0	0	0	0
ES1	Sustainable Privacy and Data Security				
	Number of information security, reported ⁴	0	0	0	0
	Number of Privacy incidents, reported ⁵	0	0	0	0

¹ Refers to the number of reported and recorded incidents where employees, contractors, or business partners were found to have violated the organization's Code of Conduct, including areas such as ethical behavior, conflicts of interest, harassment, or integrity standards.

² 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.

³ Refers to the number of reports received through official whistleblowing channels regarding potential misconduct, unethical behavior, or legal/regulatory violations within the organization or its business relationships.

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.

ESRS S1 – Own workforce

Material impacts, risks and opportunities

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 ability to innovate, deliver high-quality software and maintain a secure and resilient service offering depends heavily on its ability to attract, develop and retain a highly skilled, motivated and diverse workforce.

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: lie in fostering a strong culture of inclusion and learning, building employer brand equity and strengthening employee loyalty through purpose-driven and values-based engagement.

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 semi-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	2024 Favorability	2023 Favorability
My manager	88%	89 %
Equity and inclusion	82%	83 %
My wellbeing	77%	78 %
My experience	73%	71 %
Executive leadership	78%	71%
Overall score	8/10	7/10

Summary of the result for 2024 is summarized in the table.

Approximately 88% of the work force completed the survey in 2024.

Our employees increasingly see career and development opportunities within Optimizely and appreciate the policy for hybrid work. Furthermore, employees show confidence in Optimizely leadership and see a bright future for the company.

Optimizely offers a positive, secure work culture which is deemed important if employees and managers are to perform at their best. Thus, survey results are formally reviewed, widely shared and used to measure and adapt our management strategies and policies.

Health and well-being

The company takes a holistic approach to workplace well-being, focusing on both physical and mental health. Optimizely offers 100% healthcare insurance for all full-time employees. Besides this, we also offer mental health support via external partners, flexible work options, paid time off policies that encourages rest and access to wellness resources across its locations. Ergonomically designed workspaces, wellness webinars, manager and employee training on psychological safety and burnout prevention are all integral to Optimizely’s well-being strategy. We recognize that supporting employee health directly contributes to sustainable productivity and engagement.

Diversity, Equity and Inclusion (DEI)

DEI is embedded into hiring, talent development, and performance processes. Optimizely applies inclusive recruitment practices, mandatory unconscious bias training, and has established employee resource groups (ERGs) that provide safe spaces for underrepresented communities and promote intercultural understanding. DEI metrics, such as gender and ethnic representation, are tracked and reported to executive leadership, and leadership accountability for DEI goals is built into performance reviews. A diverse workforce improves innovation and decision-making and allows Optimizely to better understand and serve its global customer base.

Optimizely is committed to advancing gender equity across all levels of the organization, including executive leadership and line managers. We recognize that diverse leadership fosters better decision-making, enhances innovation and reflect the diversity of our global customer base.

Optimizely tracks and reports on gender representation as part of our DEI metrics and transparency commitment. The table to the right summarizes the distribution of women. In 2024, we increase women executive leaders to 40% compared to 31% in 2023. Similarly, women in line managers increase to 42% from 41%. Women employees account for 30% of total employees.

Please note that 4% represent percentage where employees choose not to disclose their gender. For specification and definition of metrics please refer to page 22.

Gender distribution	2024	2023
% C female employees	40%	30%
% C male employees	60%	71%
% C-Minus female emp	42%	41%
% C-Minus male emp	54%	55%
% C-Minus not disclosed	4%	-
% female employees	30%	31%*
% male employees	66%	69%
% Not disclosed	4%	-

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 all of our global offices.

Moreover, Optimizely is honored to be recognized as an Equitable Employer by Mathison for our commitment to creating a more fair and more inclusive workplace. The Equitable Employer badge serves as a testament to our commitment to fostering diversity, equity, and inclusion not only within our team but also to our employees, applicants, customers and investors. It showcases our collective efforts in creating an environment where everyone feels valued and supported.

We are immensely proud of the 2024 Tech Cares 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.



ESRS S1 – Own workforce (cont.)

Sustainable Human Capital Development and Talent Retention

At Optimizely, investing in the growth and development of our people is a strategic priority. We believe that a thriving workforce drives innovation, customer satisfaction and long-term business success. To foster a high-performance culture, all our employees are offered opportunities to engage in structured performance reviews *Success conversations* and career development discussions. These reviews serve not only as evaluations of past achievements but also as collaborative planning sessions for future career progression and skill development.

In 2024, approximately 46% of our global workforce participated in Mentorship and Coaching programs supported by Optimizely. These initiatives are designed to cultivate leadership capabilities, enhance professional skills, and provide guidance for personal and career advancement. Whether through formal mentoring relationships, coaching sessions, or internal career mobility programs, we support our employees in navigating their individual growth paths within the company.

Our continued focus on professional development and employee engagement has had a measurable impact on workforce stability. In 2024, we achieved an 11.1% reduction in voluntary turnover compared to the previous year. This improvement reflects the effectiveness of our people-first strategy and our efforts to create an environment where employees feel valued, supported, and motivated to build long-term careers at Optimizely.

By prioritizing skill-building, career clarity, and mentoring support, we aim not only to retain top talent but also to ensure that our workforce is equipped for the evolving demands of the digital experience platform (DXP) industry.

Policies against Forced Labor and Human Trafficking

Although Optimizely’s internal operations do not present significant risks for forced labor or human trafficking, the company maintains a strong due diligence approach. Its Code of Conduct and Anti-slavery and human trafficking policy explicitly prohibit any form of modern slavery, and all employees, contractors, and suppliers are expected to adhere to these standards. Supplier risk assessments and contract clauses enforce labor compliance across all tiers of the value chain. The company also educates employees involved in HR, legal, and procurement on identifying red flags related to labor rights violations. This vigilance reflects Optimizely’s broader commitment to upholding human rights and maintaining ethical supply chains.

ESRS S2 – Workers in the value chain

Material impacts, risks and opportunities

Impact materiality was assessed to be **High**. Optimizely’s operations depend on a broad digital supply chain that includes cloud service providers, IT hardware vendors, professional service firms, and outsourced support teams. While these workers are not directly employed by Optimizely, their working conditions can be influenced by our procurement and vendor management practices. This indirect influence creates a high materiality in terms of social impacts. In particular, risks related to labor rights, fair remuneration, occupational health and safety, working hours, and access to social protection are most significant in lower-tier supply chain segments or when services are sourced from emerging markets.

As a technology company, Optimizely’s role in setting expectations and promoting responsible business conduct across its value chain is increasingly scrutinized by customers, partners, and civil society. Failure to conduct adequate due diligence on labor practices within the supply chain may indirectly contribute to or perpetuate harmful labor conditions, even if unintentionally. This carries a material impact on affected workers and broader social outcomes.

Financial materiality was assessed to be **Medium**. From a financial perspective, the risks associated with workers in the value chain are more indirect. However, there are real exposure channels, especially through reputational risk, legal liability under supply chain due diligence regulations (such as Germany’s LkSG or forthcoming EU CSDDD), and commercial risks tied to customer expectations. If suppliers are found to violate labor standards or human rights, Optimizely may face:

- Contractual or regulatory consequences.
- Disqualification from enterprise tenders or ESG-conscious customers.
- Potential remediation costs if found complicit in violations.

Therefore, while the immediate financial materiality is assessed as **medium**, the potential for long-term value erosion or increased cost of compliance supports proactive management.

Risks: Involvement of third-party labor providers that may not meet acceptable social standards or fail to uphold international labor norms. *Potential for labor violations*, such as excessive working hours, lack of benefits, or poor workplace conditions—particularly in emerging markets. Lack of visibility into Tier 2 and Tier 3 suppliers, especially in lower-cost markets.

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: Strengthening relationships with value-aligned vendors. Differentiating through ethical sourcing policies and transparent labor practices. Leveraging supplier due diligence to enhance overall ESG performance across the supply 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.

We are in the process of enhancing our supplier engagement and ESG screening process to include a more structured due diligence mechanism focused on social performance. This includes:

- Conducting baseline risk assessments for key supplier categories.
- Integrating social criteria into vendor onboarding and renewal processes.
- Requesting third-party self-assessments and certifications, such as ISO 26000 or SA8000, where appropriate.

Optimizely is also exploring the integration of social KPIs into procurement scoring, particularly for services provided in high-risk geographies. These measures will ensure that workers employed via suppliers are treated fairly, ethically, and with respect for their labor rights.

ESRS S3 – Consumers and end users

Material impacts, risks and opportunities

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.

Impact materiality was assessed to be **Medium**. Optimizely's technologies influence how personal and behavioral data is collected, used, and interpreted. The company indirectly affects consumer rights and trust, especially regarding data ethics and algorithmic fairness. While impacts are typically mediated through clients, the platform's core functionality enables or constrains responsible digital practices.

Financial materiality was assessed to be **Medium**. Non-compliance with data protection regulations (e.g., GDPR, CCPA), or failures in algorithmic governance could result in reputational damage, regulatory sanctions, or lost business from trust-sensitive clients, especially in regulated industries (finance, healthcare, public sector).

Risks: Key risks include the potential for data privacy breaches, or the mishandling of user consent mechanisms implemented by clients. Additionally, algorithmic bias embedded in personalization features can lead to discriminatory or exclusionary outcomes, undermining trust in AI-driven experiences. A lack of transparency in how data is processed or how algorithms function may also contribute to end-user skepticism and diminished digital trust. These risks are particularly salient given Optimizely's role in enabling targeted content, behavioral analytics, and automated decision-making.

Opportunities: several opportunities emerge for Optimizely to reinforce its commitment to ethical digital experiences. By embedding privacy-first design principles and providing tools that support consent, data control, and ethical AI usage, the company strengthens its competitive position. Clients increasingly seek technology partners who align with responsible data stewardship and support compliance with regulations such as GDPR and CCPA. Tools that enhance transparency and provide explainability in algorithmic decisions can further bolster client trust and drive adoption.

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

Optimizely has not set any public targets.

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 2024, 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 2024, 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.

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 2024. Over the course of the year, 241 volunteers came together across 13 organized events, contributing a total of 1,308 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 18 event captains, who coordinated logistics, rallied colleagues, and brought energy to every project. On top of these, a total of \$19,176 USD – \$14,176 USD in BrightFunds and \$5,000 USD in cash 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 introducing a global day of service, deepening long-term partnerships with social impact organizations, and integrating community engagement goals into broader ESG 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.

Targets related to Affected Communities

Optimizely has not set any public targets.

Performance disclosure related to Social topics are found below:

Reference indices	Key performance Indicator	2023 FTE	2024 FTE	Medium 2030	Long Term 2050
S1	Employees				
	Total global employees	1,454	1,563		
	% employees in US		33%		
	% employees in EMEA		31%		
	% employees in APAC		36%		
	Employee diversity, equity and inclusion				
	Anti-discrimination incidents ¹	0	0	0	0
	Diversity, equity and inclusion ² incidents	0	0	0	0
	% female employees	31%	30%		
	% male employees	69%	66%		
	% gender, not specified	-	4%		
	% Ethnicity				
	White		26%		
	Minority		6%		
	Decline to answer		68%		
	Gender by Job Category				
	% female leadership C-suite ³	30%	40%		
	% male leadership C-suite	70%	60%		
	% female line managers C-Minus ⁴	41%	42%		
	% male line manager C-Minus	55%	54%		
	% gender, not specified C-Minus	2%	4%		
	% female in tech roles	25%	23%		
	% male in tech roles	70%	72%		
	Employee engagement ratio				
	Share your voice survey %	90%	88%	95%	95%
	Employee Engagement overall score	7/10	8/10	9/10	9/10
	Employee Wellbeing				
	Number of work-related ill health ⁵	0	0	0	0
	Days lost due to injury ⁶	0	0	0	0
	% Employee healthcare cover and resources for Full Time EEs	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		

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 behaviors or actions that undermine diversity, equity, or inclusion—such as bias, harassment, or exclusion—based on protected characteristics like 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.

Reference indices	Key performance Indicator	2023	2024	Medium 2030	Long Term 2050
S4	Consumer and End User				
	User compliance & ethical use violations, cases reported ¹	0	0	0	0
	Intensity of tCO ₂ e for every \$1,000 revenue		0.031	-30%	-50%
ES2	Sustainable Human Capital Development				
	Retention rate ²	80.1%	91.2%	95%	95%
	Voluntarily turnover ³	19.9%	8.8%		
	Overall Employee Turnover % ⁴	13.83%	13.00%		
	Career Progression – % of employees receiving Mentorship and Coaching programs	Not tracked	46%	50%	50%
	% completion rate for the latest cycle of success conversations (performance reviews)	99%	99%	99%	99%
S2	Workers in the value chain				
	Partners number on noncompliance with labor laws, case reported ⁵	0	0	0	0
	Suppliers number on noncompliance with labor laws, cases reported ⁶	0	0	0	0
	Customer number on noncompliance with labor laws, cases reported ⁷	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.