



# California's Voluntary Carbon Market Disclosures Act (California's Health & Safety Code Section 44475 et. seq.) Compliance Statement

For fiscal year ended 31 December 2024

## Introduction

The information contained in this statement is being provided pursuant to Part 10, Division 26 of the California Health and Safety Code. The disclosure is based on information available to ICON plc and its subsidiaries (together hereinafter the "Company") as of 31 December 2024 and may not reflect any new or updated information available since that date.

## Voluntary carbon offsets

### Section 44475 Disclosure

The Company is not marketing or selling voluntary carbon offsets, as defined in Section 44475 of Part 10, Division 26 of the California Health and Safety Code.

### Section 44475.1 Disclosure

The Company is not purchasing or using voluntary carbon offsets, as defined in Section 44475 of Part 10, Division 26 of the California Health and Safety Code. The Company does purchase and use renewable energy credits (RECs) to substitute for renewable energy sources in its electricity use. In 2024, the Company purchased 25,977 megawatt hours (MWh) of RECs sourced from wind power, which minimises the Company's Scope 2 greenhouse gas (GHG) emissions.

Further information on the Company's use of RECs can be found in the ICON Cares 2024 Report, pg. 49-50, 79.

## Net zero, carbon neutral, and other emissions claims

### Section 44475.2 Disclosure

In 2024, the Science Based Targets initiative (SBTi) validated the Company's near- and long-term science-based emissions reduction targets and verified our net-zero science-based target by 2050, as mentioned on pg. 44 of the 2024 ICON Cares Report. Please find below additional information on the Company's GHG emissions:

Statement	Explanation
<b>84.67% of our electricity comes from renewable sources</b>	<p>The Company has goals to switch to 100% renewable energy sources by 2025 and to reduce electricity consumption by 20% by 2030.</p> <p>The Company tracks and reports progress on goals annually. In 2024, 84.67% of our electricity came from renewable sources, with 86.45% (25,977 MWh) of renewables made up of Energy Attribute Certificates (EACs) including Guarantees of Origin and Renewable Energy Certificates (RECs) and 13.55% sourced through direct tariffs.</p>
[ICON Cares 2024 Report Pg.49]	<p>To better understand energy use, the Company partnered with Energy and Technical Services (ETS) in 2022. ETS helped identify 19 sites consuming over two-thirds of our 2021 energy. We installed real-time monitoring metres and are developing an energy management playbook for 2025.</p>
<b>18.8% reduction in kilowatt hours (kWh) compared to 2018</b>	<p>Where we cannot switch to sourcing renewable energy directly from the grid, we use Energy Attribute Certificates (EACs) like Guarantees of Origin and RECs. In 2022, we joined Schneider Electric's ENERGIZE program to reach 100% renewable electricity by 2025, alongside 24 other pharma companies.</p>
[ICON Cares 2024 Report Pg.45]	<p>In 2024, we also joined the Sustainable Markets Initiative and China Green Power Initiative, procuring 791 MWh of EACs.</p> <p>Through ENERGIZE, we purchased 25,186 MWh of wind-sourced EACs across North America, Asia Pacific, Latin America, and Europe.</p> <p>EY provides verification over the Company's total MWh as part of the external assurance process referred to below.</p>

Statement	Explanation
<b>70.06% reduction in our Scope 1 &amp; 2 GHG emissions compared to 2019 in pursuit of our near-term target of 61.2% absolute reduction by FY2028 from a FY2019 base year</b>  [ICON Cares 2024 Report Pg.15,45,48,79,81] [EY Assurance Statement]	<p>The Company has set a goal to achieve a 61.2% absolute reduction in Scope 1 and 2 market-based GHG emissions by FY2028 from a FY2019 base year.</p> <p>In 2024, we reduced our combined Scope 1 and 2 market-based GHG emissions by 70.06% compared to our 2019 base year. This achievement surpasses our SBTi validated near-term target of a 61.2% absolute reduction by FY2028. This progress also contributes to our broader SBTi validated goal of achieving net-zero GHG emissions across the value chain by 2050. The primary drivers of this reduction include the space optimisation work our real estate team did during 2024 and upgrading some locations to LED lighting and more efficient HVAC systems.</p> <p>Additionally, in 2024, the Company achieved a 12.47% reduction in our combined Scope 1 and 2 location-based GHG emissions compared to our 2019 base year.</p> <p>The Company measures its Scopes 1 and 2 GHG emissions on an annual basis according to the GHG Protocol. More information on methodology can be found in the 2024 ICON Cares Report, pg. 48 and 79.</p> <p><b>External Assurance:</b></p> <p>The Company asked Ernst &amp; Young (EY) to provide an independent, external assurance on our global operations' Scope 1 and 2 GHG emissions. EY performed the assurance in accordance with their methodology based on ISAE3000 and ISAE3410. The scope of the assurance included approximately 113 sites during the reporting period. Additional information can be found in the Assurance Statement.</p> <p>We intend to expand assurance in future years as the Corporate Sustainability Reporting Directive (CSRD) and its requirements come into force.</p>
<b>7.56% reduction in Scope 3 emissions compared to 2022</b>  [ICON Cares 2024 Report pg. 45, 51]	<p>As part of SBTi verification, in 2024, the Company leveraged our new carbon emissions reporting platform, Watershed, to expand Scope 3 emissions data tracking and calculate our Scope 3 inventory.</p> <p>Prior to 2024, the Company only measured Scope 3 emissions for Category 6, Business travel. Beginning in 2024, we have expanded our Scope 3 data to also include: Purchased goods and services, Capital goods, Fuel and energy related activities, Upstream transportation &amp; distribution, Waste generated in operations, Employee commuting and Upstream leased assets.</p> <p>We adopt strategies to reduce Scope 3 business travel emissions and our procurement team has implemented the Sustainable Procurement program to collaborate with suppliers and identify low-carbon products and services to address the remaining Scope 3 emissions categories. We have also been working with our customers on joint initiatives to reduce emissions on clinical trials.</p> <p>The Company measures its Scope 3 emissions on an annual basis according to the GHG Protocol.</p> <p><b>External Assurance:</b></p> <p>Scope 3 emissions are not yet externally verified.</p>



More information on the Company's GHG emissions disclosures is available in the **ICON Cares 2024 Report, pg. 79**, and ICON's 2024 CDP Response.

## CAUTIONARY STATEMENT ON FORWARD-LOOKING STATEMENTS

This document contains forward-looking statements. These statements are based on management's current expectations and the information currently available, including current economic and industry conditions. These statements are not guarantees of future performance or actual results, and actual results, developments and business decisions may differ from those stated. The forward-looking statements are subject to future events, risks, uncertainties and other factors that could cause actual results to differ materially from those projected in the statements, including, but not limited to, changes in regulations and law, severe weather events or the effects of climate change, the integration of new business mergers and acquisitions, the impact of pandemics on our business, as well as other economic and global market conditions and other risks and uncertainties detailed from time to time in SEC reports filed, which are difficult to predict and some of which are beyond our control. For these reasons, you should not place undue reliance on these forward-looking statements when investing in or doing business with ICON. Forward-looking statements may be identified by the use of future tense or other forward-looking words such as "believe", "targets", "goals", "intend", "expect", "anticipate", "should", "may", "strategy" or other variations or comparable terminology. Forward-looking statements are only as of the date they are made, and we do not undertake any obligation to publicly update any forward-looking statement, either as a result of new information, future events or otherwise. More information about the risks and uncertainties relating to these forward-looking statements may be found in SEC reports filed by ICON, including their respective annual reports and other SEC filings, which are available on the SEC's website at [www.sec.gov](http://www.sec.gov)

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