Global Environmental Management Policy



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ICONplc.com

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Purpose

This policy sets out the commitment of ICON plc and its subsidiaries (together "ICON") to environmental and energy management. It establishes a standard of best practice for environmental and energy management, ensuring that our business operations contribute to a sustainable future by minimising our environmental impact, continually improving environmental performance and fostering a culture of sustainability, contributing towards good stewardship of our planet for all employees, our communities, and stakeholders of ICON.

This policy supports the management of ICON's material environmental impacts, risks and opportunities (IROs) identified through its double materiality assessment (DMA), including those relating to climate change and resource use and the circular economy.



Scope

This policy applies to all ICON operations across all geographies in which ICON operates and, for climate change mitigation and adaptation, to relevant parts of ICON's upstream and downstream value chain, including suppliers, business travel and investigator sites where relevant. The commitments in the energy management section apply only to the locations and activities with the defined EnMS scope.

Definitions

Audit Committee: The Audit Committee is a subcommittee of the ICON plc Board.

CAO: Chief Administrative Officer, General Counsel and Chair of ICON's ESG Committee

CDP: CDP is a global environmental disclosure system through which organisations disclose environmental information.

ICON responds annually to CDP's Climate Change questionnaire. https://www.cdp.net/en/

CSRD: The Corporate Sustainability Reporting Directive (CSRD) (EU) 2022/2464 establishes sustainability reporting requirements for undertakings within its scope**.**

DMA: Double Materiality Assessment (DMA) under the CSRD requires companies to complete an assessment which identifies impacts, risks and opportunities (IROs) that determine what information a company is required to report on for CSRD purposes.

EMP: Global Environmental Management Plan (EMP). This plan sets out the environmental actions and targets ICON will carry out over the next few years to ensure compliance with our Global Environmental Management Policy and to engage our employees in supporting our actions for continual environmental sustainability improvement.

Energy Management System (EnMS): A set of interrelated elements used to establish an energy policy, energy objectives, processes and actions to achieve those objectives and improve energy performance.

Energy performance: Measurable results related to energy efficiency, energy use and energy consumption.

ESG: Environmental, Social and Governance.

ESG Committee: ICON's cross-functional management committee that provides operational oversight of ESG and climate-related activities.

GHG Protocol: Greenhouse Gas (GHG) Protocol provides standards and tools that help companies, countries and cities track progress toward climate goals. ICON uses the GHG Protocol Corporate Standard to measure and report its carbon emissions. https://ghgprotocol.org/

GRI: Global Reporting Initiative (GRI) is the independent, international organisation that helps businesses and other organisations take responsibility for their impacts by providing a common global language to communicate those impacts. The GRI Standards are the world's most widely used voluntary standards for sustainability reporting.

IFRS S2: IFRS S2 is a standard issued by the International Sustainability Standards Board (ISSB) that requires entities to disclose climate-related information.

ICON Cares: ICON Cares brings together all of ICON's Environmental, Social and Governance (ESG), Inclusion and Belonging (I&B) and Corporate Social Responsibility (CSR) initiatives under one program. It is a pledge to achieve more together.

NSG: The Nominating, Sustainability and Governance (NSG) Committee is a subcommittee of the ICON plc Board and it has oversight responsibilities in respect of ICON's ESG-related strategies, activities, risks and opportunities.

SBTi: The Science Based Targets initiative (SBTi) is a collaboration between the CDP, the United Nations Global Compact, World Resources Institute (WRI) and the World-Wide Fund for Nature (WWF), to help companies set emission reduction targets in line with climate science. https://sciencebasedtargets.org/

UNGC: United Nations Global Compact (UNGC) is the world's largest corporate sustainability initiative. The UNGC is a voluntary initiative based on CEO commitments to implement universal sustainability principles and to take steps to support UN goals. https://unglobalcompact.org/

References

ICON Cares: www.iconplc.com/esg

Support documents

Global Code of Ethical Conduct

Global Supplier Code of Conduct

Global Environmental Management Plan

Global Energy Management Playbook and associated EnMS procedures, records and controls

Sustainable Procurement Policy

GHG Emissions Accounting Policy & Methodology

Supplier Sustainability Engagement Plan

Annual ICON Cares ESG Report

Policy

At ICON, we recognise our responsibility to protect the environment, address climate change and use energy responsibly.

ICON is committed to delivering excellence and care to the communities in which we operate. This includes conducting business in an environmentally sustainable manner as set out in our Global Code of Ethical Conduct, complying with applicable environmental laws and regulations, and considering environmental and energy performance in relevant operational and business decisions.

In implementing this policy, ICON commits to respect the GHG Protocol, the Science Based Targets initiative criteria, the UN Global Compact principles and the goals of the Paris Agreement.

ICON will identify and manage climate-related hazards and the resulting physical and transition risks to its operations and value chain, and will integrate climate adaptation into site selection, facility design and upgrades, business continuity planning and supplier risk management.

This policy addresses the material climate-related impacts, risks and opportunities identified through ICON's double materiality assessment, namely implementing environmental management plan, enhancing strategic planning, adapting to climate change, impact of environmental footprint, engaging new and existing customers and increasing use of renewable energy.

Our approach encompasses our operations, supply chain and stakeholder engagement. We require suppliers to meet the environmental expectations set out in ICON's Global Supplier Code of Conduct, including compliance with applicable environmental laws, waste management and the responsible use of resources.

Environmental considerations may also be incorporated into relevant procurement and supplier-engagement processes, including climate, energy, waste and resource-use considerations where appropriate to the nature and significance of the environmental impact.

ICON provides information, training and awareness appropriate to roles so that employees and relevant stakeholders understand how they can support our environmental objectives and, where applicable, the effective operation of the EnMS.

As a clinical research organisation, ICON recognises that our key environmental impacts are associated with:

– energy use

– waste

– business travel

– procurement and the supply chain

ICON also recognises the importance of managing water, biodiversity and emissions into the air and water where relevant to our activities and impacts.

Objectives

1. **Address climate change and achieve net-zero carbon emissions by 2050:** Implement strategies and actions supporting ICON's climate change mitigation and, where relevant, adaptation, including ICON's climate commitments and science-based GHG reduction targets. Our approach includes reducing GHG emissions, improving energy efficiency and energy performance, increasing the use of renewable electricity and addressing relevant climate-related impacts across our operations and value chain as described in the Global Environmental Management Plan.
2. **Reduce environmental footprint:** Optimise energy efficiency and use, minimise waste generation, and use resources efficiently across all ICON operations.
3. **Increase use of renewable energy:** Switch to renewable energy tariffs in locations where available and purchase renewable energy certificates (RECs) where unavailable.
4. **Promote sustainable business practices:** Integrate sustainability into relevant business processes and decision-making.
5. **Data collection and reporting:** Collect and report ICON's Scope 1, 2 and 3 emissions. ICON is committed to reporting and disclosing in accordance with applicable reporting requirements and relevant voluntary frameworks, such as CDP, CSRD, GRI, SBTi, IFRS S2, and will continue to improve reporting to comply with any regulatory changes on mandatory reporting.
6. **Engage stakeholders:** Collaborate with employees, customers, suppliers, investors and communities to drive environmental awareness and action.

Energy Management

ICON maintains an Energy Management System (EnMS) for locations and activities included within its formally defined scope and boundaries. The EnMS supports the systematic management of energy performance, including energy efficiency, energy use and energy consumption. Energy management principles and good practices may also be promoted more broadly across ICON's global operations where practicable.

Within that scope, ICON commits to:

– Continually improving energy performance, including energy efficiency, energy use and energy consumption, and the EnMS;

– Establishing and reviewing energy objectives and targets that are appropriate to our activities and provide a framework for action;

– Ensuring that information and resources necessary to achieve energy objectives and targets are available;

– Meeting applicable legal requirements and other requirements relating to energy efficiency, energy use and energy consumption;

– Using appropriate energy data, energy performance indicators and energy baselines to monitor performance and identify improvement opportunities;

– Supporting the procurement of energy-efficient products and services that can affect energy performance;

– Considering opportunities to improve energy performance in the design and modification of facilities, equipment, systems and energy-using processes;

– Providing appropriate awareness, information and competence support to people whose work can affect energy performance

Details of the applicable scope, boundaries and supporting requirements are maintained within controlled EnMS documentation.

Governance and reporting

ICON's CAO has executive responsibility for this policy, supported by the ESG Committee in overseeing its implementation and monitoring. The NSG Committee of the ICON plc Board receives quarterly updates on ESG matters from the CAO. The CAO also provides periodic updates to the executive leadership team. The Audit Committee oversees ESG-related reporting in ICON's annual report, including the sustainability statement, with the CFO reporting to the Audit Committee on these matters.

The ESG Committee is a cross-functional management committee that provides ESG-related operational oversight. The committee initiates, reviews and communicates updates and plans to ensure consistency, promote collaboration and enhance monitoring. The committee also identifies potential areas for development and facilitates reporting on progress to the Board.

ICON is committed to publishing ESG data annually, including details of our environmental performance against targets and significant achievements.

Environmental management and continual improvement

This policy is supported by the Global Environmental Management Plan, which sets out environmental targets and actions, and by the Global Energy Management Playbook and associated EnMS documentation. ICON is committed to monitoring and reviewing its environmental management arrangements and to continually improving environmental and energy performance.

Policy review and availability

This policy will be reviewed at least every two years and when significant changes occur to ICON's environmental or energy context, strategy, governance, EnMS scope, applicable legal requirements, or the material environmental impacts, risks and opportunities identified through ICON's DMA. Relevant stakeholder interests and feedback will be considered, where appropriate, in the ongoing development and review of ICON's environmental management approach. The policy will be communicated within ICON and made available to interested parties through ICON's public website.



Document history

Number	Version	Effective date	List principal changes from previous version
FM-POL-GEM	3.0	01-Nov-2026	Integrated energy-management and EnMS commitments; added EnMS supporting documentation. Minor general amendments. Updates to policy for improved CSRD alignment.
FM-POL-GEM	2.0	01-Nov-2024	– Layout change – Expanded Purpose – Scope, now encapsulates companywide application, with removal of divisional groupings – Added Definitions table – Expanded supporting documents – Simplified objectives listing – Added Governance and Reporting section – Diagram removed
FM-POL-GEM	1.0	2016	New policy



ICON plc Corporate Headquarters
South County Business Park
Leopardstown, Dublin 18
Ireland
T: (IRL) +353 1 291 2000
T: (US) +1 215 616 3000
F: +353 1 247 6260

ICONplc.com/contact

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