

Global Environmental Management Policy



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Purpose

This policy sets out the commitment of ICON plc and its subsidiaries (together “ICON”) to setting a standard of best practice for environmental 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.

Scope

This policy applies to all ICON operations, ICON employees, contractors and consultants who work within ICON.

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, formally known as Carbon Disclosure Project, are a not-for-profit charity that runs the global disclosure system for investors, companies, cities, states and regions to manage their environmental impacts.

ICON discloses to the CDP Climate Change questionnaire annually. <https://www.cdp.net/en/>

CSRD: The Corporate Sustainability Reporting Directive (CSRD) entered into force on 5 January 2023. The CSRD EU directive requires large and listed companies to publish regular reports on the risks and opportunities arising from climate change and other sustainability topics affecting the company, and on how their activities impact people and the environment.

ICON will report under the CSRD on our 2025 data in 2026.

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.

ICON completed our first DMA in accordance with the CSRD during 2024.



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.

ESG: Environmental, Social and Governance.

ESG Committee: ICON’s ESG Committee provide operational information and oversight for ESG and climate-related activities across all of ICON. The ESG Committee is chaired by the CAO and initiates, reviews, and communicates updates and plans on ESG related activity and initiatives to the Board.

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 global common 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), Diversity, Inclusion and Belonging (DIB) 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 to 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
Sustainable Procurement Policy
Supplier Sustainability Engagement Plan
Annual ICON Cares ESG Report

Policy

At ICON we recognise our responsibility to protect the environment and address climate change.

ICON is committed to delivering excellence and care to the communities in which we operate. This includes conducting our business in an environmentally sustainable manner as set out in our Global Code of Ethical Conduct. We also require our suppliers to abide by our Global Supplier Code of Conduct which includes compliance with applicable environmental laws and regulations and our expectations regarding waste management and sustainable use of resources.

This Global Environmental Management Policy outlines our commitment to conducting our business in an environmentally sustainable manner by managing and improving our environmental performance across all business activities, with a target to achieve net-zero carbon emissions by 2050. Our approach encompasses all aspects of our operations, supply chain, and stakeholder engagement. ICON provides ongoing training and awareness programs to ensure that all employees understand their role in environmental management.

ICON is committed to upholding the objectives outlined in this policy and complying with local environmental laws and regulations.

As a clinical research organisation, ICON recognises our key environmental impacts are in the areas of:

- energy use
- waste
- travel and
- procurement

And whilst it has been deemed immaterial to ICON operations during our DMA, ICON recognises the importance of:

- biodiversity
- water use
- emissions to air/water

Objectives

- 1. Achieve net-zero carbon emissions by 2050:** Implement strategies to achieve net zero carbon emissions. Strategies for reducing carbon emissions are outlined in the Global Environmental Management Plan.
- 2. Reduce environmental footprint:** Optimise energy 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 that is available and purchase renewable energy certificates (RECs) where unavailable.
- 4. Promote sustainable business practices:** Integrate sustainability into all business processes and decision-making.
- 5. Data collection and reporting:** Collect and report ICON's Scope 1, 2 and 3 emissions. ICON is also committed to reporting and disclosing within all material reporting standards and frameworks, such as CDP, CSRD, GRI, SBTi, IFRS S2 and will continue to improve reporting requirements 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.



Governance and reporting

ICON's CAO leads our ESG Committee, which oversees ESG strategy and initiatives. The CAO reports quarterly to the NSG Committee on ESG matters and reports to the ICON plc Board on an annual basis, while also providing periodic updates to the executive leadership team. The Audit Committee has oversight of ICON's external reporting on environmental, social and governance ("ESG") matters included in ICON's financial statements.

The ESG Committee is a cross-functional management committee that provides ESG-related operational oversight, as well as initiates, reviews and communicates updates and plans to ensure ICON Cares program consistency, promote collaboration, enhance monitoring, reveal areas for development and facilitate reporting to the Board.

ICON is committed to publicly publishing our ESG data annually, which includes detailing our environmental performance against targets and significant achievements and we are developing the necessary processes with an aim to have all Scope 1, 2 and 3 emissions data independently verified.

ICON is fully committed to the continual improvement of the environmental management system through constant monitoring and review to reduce our environmental impacts.

Global environmental management plan

ICON is committed to the fight against climate change. This Global Environmental Management Policy and our accompanying Global Environmental Management Plan (EMP) reflect our dedication to sustainability and our determination to create a positive impact on the planet.

Our EMP outlines the targets and steps being taken by ICON to meet its objectives set in this policy.

Document history

| Number | Version | Effective date | List principal changes from previous version |
|------------|---------|----------------|---|
| FM-POL-GEM | 2.0 | 01-Nov-2024 | <ul style="list-style-type: none">– 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 | | New policy – 2016 |
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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](https://iconplc.com/contact)