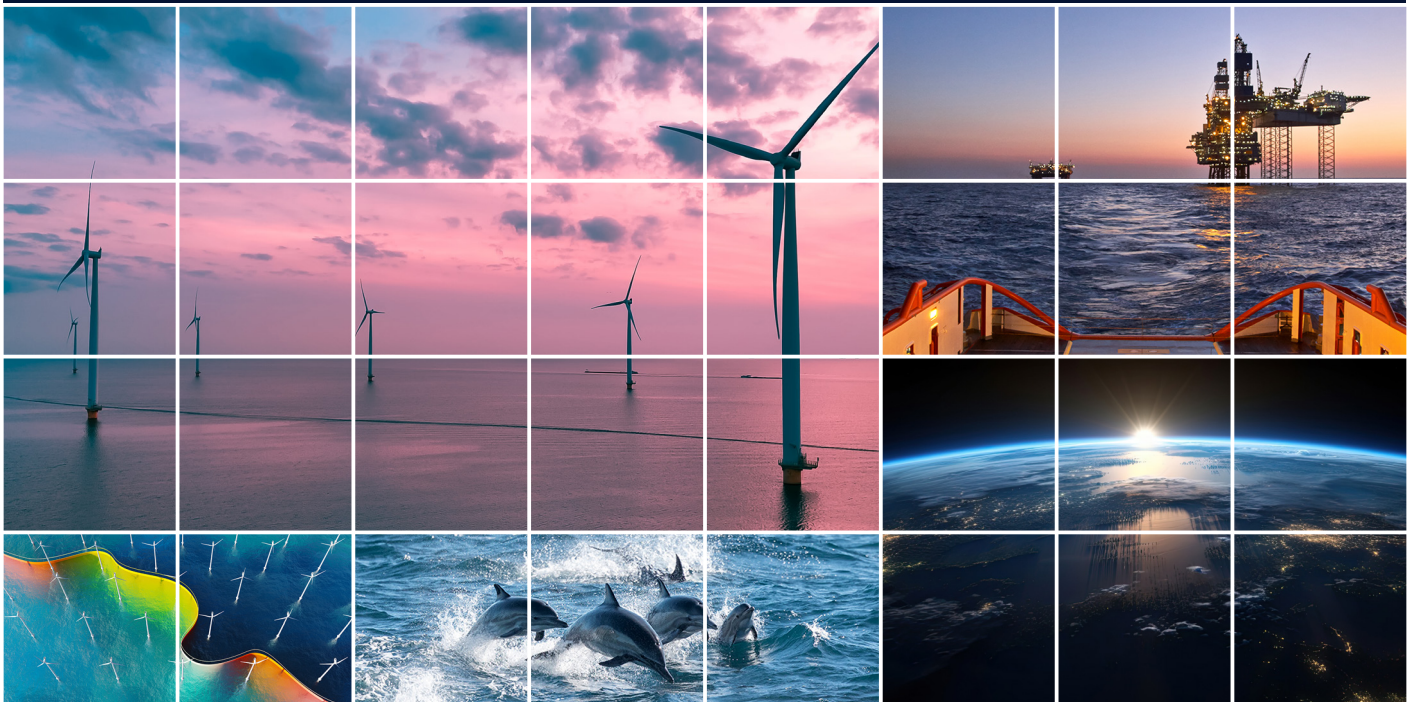




# SUSTAINABILITY REPORT 2024

[www.xodusgroup.com](http://www.xodusgroup.com)





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## 1. WE ARE XODUS

Xodus is a leading global energy consultancy, providing support across the energy spectrum, from advisory services to supply chain advice. Including all the engineering and environmental expertise needed in between. Our unique and diverse people strive to ensure global energy supply as we all work together to realise a net zero world.

Wholly owned by Subsea7, a global leader in the delivery of offshore projects and services for the energy industry, Xodus operates independently under our own leadership team and board, ensuring our advice remains objective and client focused. Our values of Trust, Responsibility, and Excellence guide every decision we make as we work towards our vision, ***“Together, we will deliver a responsible energy future”***.

In 2024 we launched Evolv Energies, a dedicated renewables engineering team, strengthening our capabilities in offshore markets. We also embedded organisational changes to enhance cross-sector and discipline collaboration within our regional teams. Reinforcing our ability to deliver integrated and innovative energy solutions to tackle our clients complex engineering, environmental and advisory challenges. We also introduced Global Xcellence Hubs, including one focused on sustainability, to concentrate specialist expertise in key regions, enabling consistent, high-quality support for global energy projects and accelerating the energy transition.

Sustainability is embedded at every level of our business. As a proud member of the United Nations (UN) Global Compact (UNGC) since 2019, and we align our Vision 27 strategy with the Sustainable Development Goals (SDGs) ensuring our technical teams deliver meaningful impact for client projects. In addition, we prioritise our own responsible governance and are proud to maintain net zero status. In 2024, we advanced our governance framework by enhancing human rights risk assessments and cybersecurity safeguards, while focusing on equity, diversity and inclusion across our global operations through the

launch of our Place to Work commitments.

In 2023, we identified priority UN SDGs and have been measuring how our services support these goals since then. As energy consultants, we have a unique opportunity to accelerate the transition through the expertise and advice we provide, and we present some projects of which we are most proud in this report. Our sustainability credentials reflect the dedication of our expert and passionate people to inspire change within the energy industry. As we look ahead, we will continue to invest in our people, our clients and our planet, ensuring Xodus remains a trusted partner in delivering a responsible energy future.



***Stuart Holley, Chief Executive Officer***



## 2. SUSTAINABILITY AT XODUS

I am pleased to present Xodus' first standalone sustainability report, covering the period 1 January to 31 December 2024 aligning with our financial year. The report reflects our commitment to driving climate action, fostering responsible governance and creating social value, anchored in global collaboration and strong stakeholder relationships.

### Our Sustainability Focus

While still early in our sustainability journey, we continued to evolve our sustainability efforts in 2024, by strengthening governance frameworks, expanding our renewables portfolio, and deepening our commitment to the UNGC and the SDGs. Listening to and acting on stakeholder expectations remains central to our approach, shaping the priorities and actions you'll find in this report. Xodus engages with its stakeholders, i.e. our investor Subsea7, employees, clients, communities, regulators, suppliers and industry bodies as a continued effort through regular surveys, consultations, feedback mechanisms and transparent communication channels.

In 2024, the identification of our material responsible governance topics was carried out by our sustainability experts through a structured and consultative process, that combined internal expertise of internationally recognised sustainability standards and frameworks<sup>1</sup>, with our operational activities. Employee feedback, regulatory requirements, stakeholder expectations, industry benchmarking and emerging sustainability trends all contributed to our process.

Our material topics reflect the issues that are most relevant to Xodus business, stakeholders and long-term contribution to a responsible energy future. Impacts occur within leased offices, client projects and through supply chain activities. Xodus contributes directly via its operations and is indirectly linked to impacts through business relationships.

1. Such as the Global Reporting Initiative (GRI) Standards, UNGC, International Organisation of Standards 14001 and 45001, the UN SDGs, the Greenhouse Gas (GHG) Protocol, Taskforce for Climate related Financial Disclosures, key human rights conventions.

This report covers all entities operating under Xodus Holdings Limited across global locations, with no exclusions or adjustments to reporting boundaries.

### Our material topics include:

#### Governance

- Leadership and governance
- Anti-corruption
- Digital security and privacy

#### Social

- Human rights
- Non-discrimination in respect of employment and occupation
- Gender equality and women's rights
- Wages and working hours
- Land rights and rights of Indigenous Peoples
- Safe and healthy working environment

#### Environment

- Energy
- Green House Gas (GHG) emissions
- Waste

We are committed to embedding these topics into strategic decisions and daily operations, managing them through regular reviews, audits, and performance assessments. The purpose of this management approach is to ensure transparent, responsible business practices that minimise risks, enhance positive environmental and social outcomes. The management approach is evaluated regularly through internal audits, performance reviews, and stakeholder feedback, enabling continuous improvement of our sustainability governance and practices.

### About This Report

Prepared in alignment with the GRI Standards (2023), key facts about our business, organisational profile and our sustainability initiatives for 2024 are presented in this report. Our actions taken to strengthen governance and manage social and environmental impacts are highlighted, in addition to examples of how our activities support the energy transition and align with our priority SDGs. Guided by transparency, accountability and meaningful impact, we continue our journey toward our vision of a responsible energy future and will share our progress through annual reporting.

**Rebecca Hewlett, Global Sustainability Director**



### 3. THIS IS WHAT WE DO: BUSINESS OVERVIEW

Xodus was established in 2005 to integrate subsea & pipelines, flow assurance, topsides and technology to deliver a holistic integrated approach to solutions.

In 2006 we created our first ever digital twin for the United Kingdom (UK) North Sea FLAGS pipeline to deliver more efficient operations. We integrated our Environment team in 2007 which brought with it renewables capability. 2007 also saw us enter the Australian market in Perth, allowing us to grow our Liquefied Natural Gas capability.

Over the years we continued to expand our locations and added integrated subsurface and vibration services. In 2014 we supported the consent of the first ever floating wind project (Hywind in Scotland) and in 2015 started supporting the Gorgon Carbon Capture and Storage project in Australia, the fourth largest in

the world. We continued to develop our renewables offering and in 2019 we supported our first Hydrogen project. The year of this disclosure, in 2024 we launched Evolv Energies, a specialist team providing engineering services for renewable energy projects.

Today we operate across three regions, Europe Middle East & Africa (EMEA), Asia Pacific (APAC) and the Americas, providing energy services to key sectors of oil and gas, offshore wind, carbon capture, utilisation and storage, cables and interconnectors, hydrogen and marine energy. Our global experts continue to strive for excellence, so that we can achieve our vision: ***Together, we will deliver a responsible energy future.***

In 2023 we launched our strategy: Vision 27, our five-year roadmap designed to transform ambition into action and position Xodus as a global leader in delivering meaningful impact. 2024 saw us continue to deliver against the four focus areas that define the company we want to be by 2027:



#### 1. Global leaders creating meaningful impact

We will lead technically and commercially across key energy sectors, expanding capabilities in hydrogen, emissions, climate, and power systems, while influencing global markets and creating innovative solutions.



#### 2. The place to work

We will build an inclusive, flexible, and inspiring workplace where career development, diversity, and wellbeing are prioritised, making Xodus the employer of choice.



#### 3. Highly profitable business

We will strengthen commercial resilience by optimising consulting, architecting, and productisation models, ensuring we are rewarded for the value we deliver.



#### 4. Resilient business

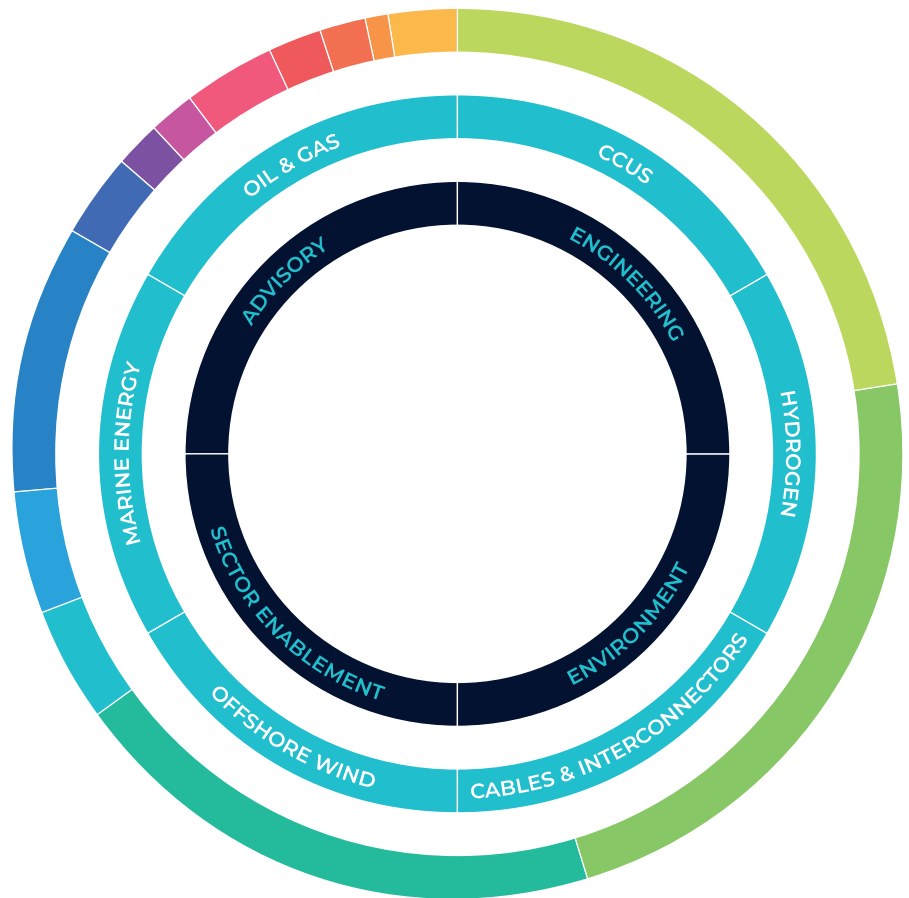
We will reinforce leadership, performance, and systems to ensure adaptability, efficiency and long-term sustainability in a rapidly changing energy landscape.



Combining our skills  
to deliver a truly  
integrated offering.

SPECIALISTS BY DISCIPLINE:

- Process & Facilities
- Subsea & Pipelines
- Environment
- Production Assurance
- Technical Safety & Risk
- Vibration
- Integrity Management
- Emissions
- Decommissioning
- Digital & Data
- Subsurface
- Energy Developments
- Energy Yield Analysis
- Sector Enablement



**350+** technical  
personnel with  
**17** years average  
experience



Over **7,000,000**  
work-hours  
dedicated to  
completing more  
than **15,000**  
projects



Servicing all  
stages of a  
project's lifecycle  
over the full  
spectrum of the  
energy industry



Largest project  
totalling **50,000**  
work-hours;  
smallest project  
**1** work-hour



Over **500**  
clients and **70+**  
MSAs globally  
with majors,  
independents  
and NOCs





## 4. GOVERNANCE

### Leadership & Governance

Xodus is governed by a leadership team led by the Chief Executive Officer (CEO), under the oversight of a board of directors. As part of the Subsea7 Group, Xodus aligns its governance framework, policies, and corporate commitments with those of its parent company and reports to relevant Subsea7 corporate functions.

The Board comprised of a mix of executive members with expertise in engineering, finance and sustainability. To ensure independent oversight, the Chair is separate from executive management. Board members are appointed based on professional credentials, sector experience, and alignment with Subsea7's governance standards.

Day-to-day management of Xodus' significant impacts, including sustainability, risk, ethics and compliance, is delegated to the CEO and the Leadership Team members<sup>2</sup> in the UK and APAC. Our leaders are accountable for strategic direction and operational performance as well as implementation of sustainability policies and processes. Department heads and managers apply group-level guidance and monitor performance within their areas.

The management of the business and the execution of our strategy are subject to a number of risks which are managed through processes which seek to limit the adverse effects of these factors on the business. Our material topics align with our strategic and business risks and are described throughout this report.

### Ethics & Compliance

Ethics, integrity, and compliance are embedded across Xodus operations through our Anti-Bribery and Corruption Policy, Codes of Conduct for ourselves and our supply chain and other governance policies. All directors and employees must adhere to these policies, communicated via mandatory training and accessible on internal online platforms.

The Board oversees ethical standards, while operational responsibility rests with the CEO and Leadership Team. Mechanisms such as whistleblowing channels, compliance monitoring and regular policy reviews ensure accountability and allow stakeholders to raise concerns confidentially. We periodically update our governance framework to reflect regulatory changes, stakeholder expectations and industry best practice.

We operate in full compliance with all applicable laws and regulations in the global regions where we operate. Our internal policies and procedures, aligned with regulatory requirements, ensure obligations are consistently met across our operations. In 2024, no fines or non-compliance events were reported.

### Management Systems

Our global integrated management system, Xodus Integrated Quality (XIQ), is inclusive of health and safety management and is voluntary, not in place due to legal requirements. The activities covered by XIQ are primarily office environment related risk management, with additional coverage for higher-risk activities such as business travel and offshore/site work.

Our governance is strengthened by certification to the International Organisation of Standards (ISO) management system requirements of:

- ISO 9001 – Quality Management
- ISO 45001 – Health & Safety Management
- ISO 14001 – Environmental Management

2. All of which were hired from the local community.



The system covers our whole workforce of 589 individuals<sup>3</sup> in 2024 (with no exclusions) and is internally audited. Our UK locations (443 individuals in 2024) were also audited externally for compliance with our ISO certified systems. Operations in other jurisdictions, as well as being compliant with local laws, are required to use our online systems which are themselves certified to the ISO management system standards. The systems support structured oversight, risk management, and continuous improvement across our operations.

TOPIC	2024 PERFORMANCE
<b>Anti-Corruption<sup>4</sup> &amp; Anti-Competitive Behaviours</b>	<ul style="list-style-type: none"> <li>• No corruption incidents or legal actions for anti-competitive behaviour occurred in 2024.</li> <li>• We strengthened our anti-corruption measures by aligning closely with Subsea7's compliance protocols and preparing to match their ISO 37001 certified system requirements.</li> <li>• 100% of our 438 required employees (including all five in the UK and one in Australia members of our Leadership Team) completed our mandatory compliance training.</li> <li>• All new suppliers received our Code of Conduct with anti-corruption and anti-competitive provisions, and our clients we contract with using our standard, unamended Terms and Conditions, must comply with our anti-corruption clauses.</li> </ul>
<b>Digital &amp; Data Security</b>	<ul style="list-style-type: none"> <li>• We did not have any reported breaches of customer privacy or data loss in 2024. A continuous improvement programme is underway to embed our Data Protection Policy further, focusing on data loss prevention and classification to bolster our digital and data security.</li> </ul>
<b>Management System</b>	<ul style="list-style-type: none"> <li>• In 2024, we enhanced our Lessons Learned System and action tracking processes to improve incident review and organisational learning.</li> <li>• Key policies were updated for inclusivity and flexibility, and our APAC handbook was updated to align with current Australian employment law.</li> </ul>

3. Employees (full, part time, and fixed term), associates and zero-hours workers.

4. All of our operations undergo risk assessments prior to undertaking the client scopes of work and all of our new clients and suppliers are assessed for risks related to corruption as a matter of routine in our processes.

5. Anti-bribery Management System.





## 5. PARTNERSHIPS

Xodus continues to prioritise transparency and responsible business practices, providing regular updates on sustainable supply chain practices, client satisfaction and industry development.

### Our Suppliers

We manage our supply chain in alignment with our own principles (e.g. ethical conduct, QHSE) which are outlined in our Supplier Code of Conduct. In 2024, we initiated efforts to enhance our supplier engagement and sustainability practices to integrate our material sustainability topics into our value chain. Our efforts will be reported in our 2025 sustainability report. Supplier performance is monitored through regular reviews, with corrective actions implemented as needed. Additionally, 93% of procurement spend<sup>6</sup> in our countries of operation was directed to local suppliers, supporting local economies and fostering long-term partnerships. To further improve efficiency, we introduced digital tools for supplier onboarding and invoice processing, enhancing both effectiveness and operational speed.

### Our Clients

The satisfaction of our clients is paramount to the longevity of our business and therefore our ability to deliver our Vision and business targets. Client satisfaction information is gained from a number of different sources e.g. formal feedback requests both during and at the closure of our projects, repeat work, work extensions, through regular engagement during the projects and performance reviews with the clients.

### Industry Development

It is very important to us at Xodus to be a leading voice within industry, to share our knowledge and collaborate across the industry to move towards a net zero world, we do that through industry events and engagements. In 2024, we participated in 45 global industry events across EMEA, APAC and the US. Our contributions included 12 presentations, nine panel discussions, five exhibitions, and sponsorship of four initiatives. Through these engagements, we share

expertise, exchange best practices, and collaborate with stakeholders to support responsible industry development. These activities complement our core SDG priorities and ensure that our partnerships align with sustainability objectives.

### Global Summary Table

		Global	EMEA	APAC	US
	Attended	45	15	6	12
	Exhibited	5	3	1	1
	Presented	12	7	3	2
	Panel Session	9	4	2	1
	Sponsored	4	3	0	1

6. Approximately a third of our spend in 2024 was on software to allow us to carry out the technical scopes of work for our clients. Our non-employee technical expert workers constituted nearly 20% with the remainder the purchase of general office and business supplies.



## 6. SOCIAL

To achieve our Vision 27 objectives, *Global Leaders Creating Meaningful Impact and a Resilient Business*, it is critical that we have consultants who can drive change for our clients and communities. Safety remains fundamental, and we also aim to create an environment where our people thrive. In 2024, we launched our *Place to Work* commitments to help us to deliver our suite of people focused Policies<sup>7</sup>, The Place to Work was designed to create an inclusive, flexible and inspiring workplace where career development, diversity and wellbeing are prioritised. Our focus topics will remain central to our culture and strategy.



### **We open the door...**

**Why?** Xodus is a place where innovative thinking is key, and this is only possible with a diverse talent pool. To ensure we have a rich and diverse workforce we will address any biases.



### **We break down barriers of accessibility...**

**Why?** For every person at Xodus to thrive we will create an even playing field. We will break down the barriers that exist for people so that they can truly be their best selves at work.



### **We solve clients' problems with diverse teams...**

**Why?** Excellence is at the very core of what Xodus does and the only way to deliver excellence is through diverse teams. Great minds don't all think alike.



### **We prioritise the psychological safety and wellbeing of each other...**

**Why?** To be our best we have to feel our best so we will create open and safe environments where all our people can contribute.



### **We recognise the right to a life outside of work...**

**Why?** We know that being a great problem solver is more than being behind a desk 9-5. We will enable a work life balance that creates the space to do all the things that make a person themselves.

### **Remuneration & Employee Benefits**

Xodus is an accredited living wage<sup>8</sup> employer in the UK. Our remuneration process is governed by an internal policy which is designed to drive fair and competitive pay, benefits, and incentives for all employees. Pay is set based on role, experience, market benchmarks, and performance, and is reviewed annually for transparency and alignment with organisational goals.

Xodus extends most of the benefits to both its full and part time employees across the globe with jurisdictional specifics, such as life assurance, health care, group income protection, parental leave (available from day one to all our employees), pension/superannuation or equivalent, employee assistance programme, cash plan, cycle to work and flexible working.

7. Our Anti-Harassment and Bullying, Equal Opportunities, Flexible Working, Stress, Substance Misuse Policies are part of our suite of commitments.

8. <https://www.livingwage.org.uk/>



## Employee Voice

Through our culture we encourage our people to feel safe and speak up<sup>9</sup>. We strengthened employee voice through dedicated funding and executive sponsorship for our networks, including Neurodiversity, Early Careers, Women, Pride, HSE committee, Sustainability Champions, and Wellbeing initiatives. To ensure feedback drives meaningful action, we conducted two engagement surveys during the year, achieving strong participation rates of 75% and 72%.

## Training & Education

Employees benefit from a wide range of development opportunities, including career workshops and a target of 3 training days per year. Plans are underway to enhance our competency framework, while programmes such as chartership support, mentoring and transition assistance continue to help employees progress professionally. In addition, 98% of employees received regular performance reviews, reinforcing our focus on growth and continuous improvement.

TOPIC	2024 PERFORMANCE
<b>Safe &amp; Healthy Working Environment</b>	<ul style="list-style-type: none"> <li>Occupational health and safety initiatives included psychosocial safety training in Australia and a company-wide survey, with further compliance modules planned.</li> </ul>
<b>Wages</b>	<ul style="list-style-type: none"> <li>Phase 1 of a pay transparency initiative was launched, supporting fairness and gender equity, with further development planned.</li> <li>In 2024, new hires and turnover were tracked by gender, region and age group.</li> </ul>
<b>Working Hours<sup>10</sup></b>	<ul style="list-style-type: none"> <li>The 9-day fortnight initiative was established for launching in 2025 with the aim to improve work-life balance and wellbeing.</li> </ul>
<b>Non-discrimination in Respect of Employment &amp; Occupation</b>	<ul style="list-style-type: none"> <li>Inclusive recruitment practices were embedded, with ongoing expansion and refinement.</li> <li>Our 2024 UK Gender Pay Gap report is available on our internet site. Reporting is being accelerated in Australia for proactive analysis and action.</li> <li>No incidents of discrimination or violations of the right of indigenous peoples were reported in 2024.</li> </ul>
<b>Gender Equality &amp; Women's Rights</b>	<ul style="list-style-type: none"> <li>Our Empowering Women Development Programme, Elev8, was expanded globally in 2024 to support women's leadership and career progression.</li> <li>Diversity metrics show strong female representation in governance (67%), with 40% among employees.</li> </ul>

## Safe & Healthy Working Environment

Our ISO45001 certified management system facilitates our delivery of our Statement of QHSE Principles and is a core aspect of our operations and a demonstration of delivery of all the GRI requirements. We systematically identify hazards and assess risks associated with both routine and non-routine activities, applying the hierarchy of controls to manage these risks effectively. Office site risk assessments and activity e.g. travel-specific risk assessments are established, implemented, and maintained by competent employees, with competency assured through our HSE training matrix. Employees are consulted on health and safety matters through our safety committees (including learnings from incidents), and encouraged to report hazards,

observations, and incidents through our online system for investigation by our dedicated HSE personnel. "Stop the job" procedures empower employees to remove themselves from unsafe situations.

Routine training is provided as required, such as First Aid, Fire Warden, Display Screen Equipment Assessor, Manual Handling, IOSH Working Safely, IOSH Managing Safely, NEBOSH and offshore safety training where required. Worker health is supported through various jurisdictional specific means e.g. private medical care, Employee Assistance Programme, as well as preventative initiatives including flu vaccinations, and wellbeing programs addressing mental health, ergonomics, and broader health risks.

9. Grievance and Speak-up Policies.

10. Xodus adheres to all local statutory requirements regarding notice periods for significant operational changes that may substantially impact employees.



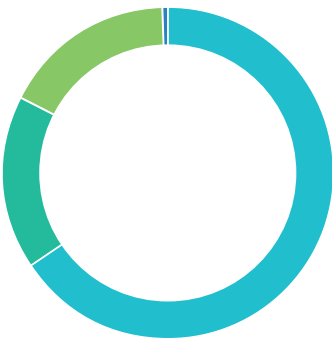
## 7. ENVIRONMENT

Addressing GHG emissions and climate change is central to our vision, values, and responsible business strategy. As an office-based consultancy, our greatest environmental influence comes through advising clients on decarbonisation, climate resilience, and the energy transition.

We are proud to have maintained net zero status for our own GHG emissions for the fourth consecutive year. In 2024, we significantly enhanced the quality of

our emissions data, giving us greater confidence in our inventory and establishing 2024 as the baseline year for future reductions.

Our focus now is on identifying management options by highlighting emissions hotspots and exploring reduction opportunities with focus on our Travel Policy. We are also extending our Scope 3 inventory into our value chain, reviewing internal practices and supply chain management to further reduce our footprint, while continuing to support clients in their transition to a responsible energy future.



TOTAL GHG EMISSIONS BY SOURCE

- Business Travel (66%)
- Employee Commuting (17%)
- Electricity (17%)
- Waste Generated in Operations (0%)

GHG EMISSIONS 2024 PERFORMANCE SCOPE	
Scope 1	<ul style="list-style-type: none"><li>• We maintained zero Scope 1 greenhouse gas emissions, for the fourth year.</li></ul>
Scope 2	<ul style="list-style-type: none"><li>• Improved our data by sourcing greater detail of electricity usage and the market-based certificates to evidence the renewable source of the electricity.</li></ul>
Scope 3	<ul style="list-style-type: none"><li>• We extended our inventory to include waste business travel and employee commuting.</li><li>• Began investigations into our final applicable Scope 3 categories of purchased goods and services, capital goods and upstream transportation and distribution.</li></ul>
Total	<ul style="list-style-type: none"><li>• Our unabated Scope 2 emissions which are not addressed through market-based instruments and Scope 3 categories included in our emissions inventory to date (all our business travel, commuting and waste) were mitigated by the purchase of carbon credits from the UN Carbon Offsets Platform<sup>11</sup>.</li></ul>

### Waste

Our paper, plastics, food waste and limited electronic equipment waste arises from office activities. We prioritise preventing waste at source, reducing it where avoidance isn't possible, and regulatory compliant disposal using accredited carriers. Paper waste is minimised through paperless practices, double-sided printing, limited printers and accessible recycling bins. Staff receive refillable bottles to reduce plastic waste, with recycling points provided

throughout our offices. Food waste is collected in dedicated bins, and electronic equipment is maintained to extend its life and replaced in line with regulations, with recycling where possible.

Building management in our serviced offices supplies data on waste segregation, supporting transparent reporting. Overall, our approach aligns with the waste hierarchy and circular economy principles by reducing landfill disposal and maximising resource recovery.

<sup>11</sup>. <https://unfccc.int/climate-action/united-nations-carbon-offset-platform>



## 8. CREATING MEANINGFUL IMPACT

In determining our sustainability strategy, we followed the UNGC process<sup>12</sup> in 2023. The approach enabled us to assess where our business activities and expertise could generate the greatest positive impact, with targeted and effective actions. Our leadership team received a detailed overview of the process and criteria used during prioritisation for endorsement.

As a result, we have chosen to focus on seven of the 17 SDGs, concentrating on those areas where we believe our work can drive the most meaningful change. Our priority SDGs and their associated targets are integrated into our operational strategy and client engagements, underpinning our commitment to responsible business practices and sustainable progress.

The key to creating meaningful impact on our priority SDGs lies in the work we deliver for our clients, particularly within the energy transition. Our website, [www.xodusgroup.com](http://www.xodusgroup.com), offers further details on the breadth of our projects and initiatives across the energy sector, showcasing how our expertise supports sustainable development and industry transformation.

### SUSTAINABLE DEVELOPMENT GOALS



### CASE STUDIES



#### SDG 5.5 Women of Offshore Wind (WOW), Australia

WOW Australia is a collaborative network promoting diversity and inclusion in the offshore wind sector through mentoring, events, and knowledge-sharing. Xodus actively supports WOW by sponsoring initiatives, hosting industry engagement sessions, and providing expertise to empower women in technical and leadership roles. This partnership helps breakdown barriers in a traditionally male-dominated industry and helps drive progress towards a more

sustainable and equitable energy future. WOW contributes directly to SDG 5.5 by nurturing gender diversity within the offshore wind industry in Australia and ensuring women's full participation in shaping the energy transition.

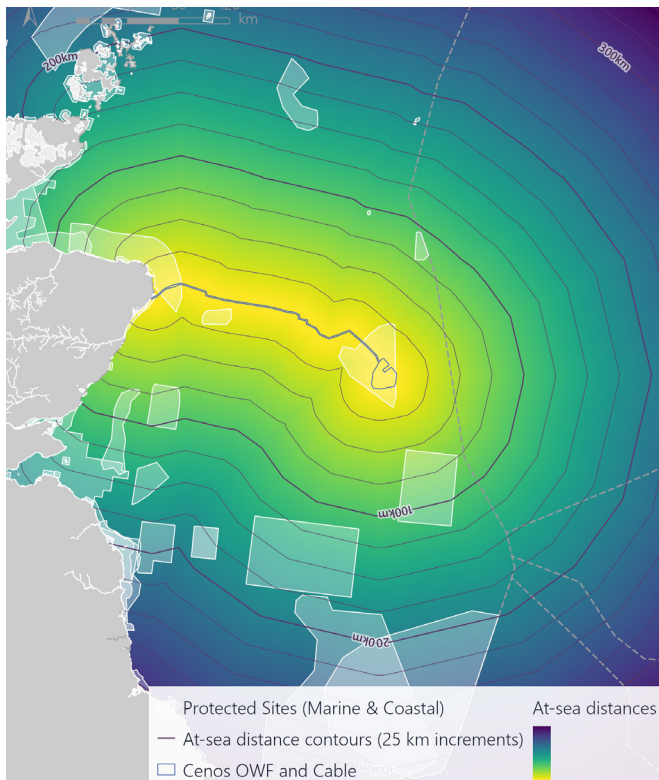
#### EMPOWERING THE ENERGY INDUSTRY

**SDG 5.5 Empowering the Energy Industry (ETEI), UK**  
ETEI is a Xodus-led initiative creating a network of senior

women in the energy sector to foster dialogue, mentorship, and leadership opportunities. Starting in Aberdeen and expanding internationally, ETEI connects over 150 influential women, enabling knowledge-sharing and visibility for female leaders. By promoting inclusive decision-making and supporting women's progression into leadership roles, ETEI directly contributes to SDG 5.5 and drives cultural change across the industry. In 2024 ETEI events were held across Scotland.

<sup>12</sup> Integrating the SDGs into Corporate Report: A Practical Guide for full methodology





### SDG 7.2 Cenos Floating Offshore Windfarm, Environmental Impact Assessment (EIA), UK

Xodus led the EIA for the Cenos Floating Offshore Windfarm, delivering all regulatory documentation and stakeholder engagement for this major UK project. The project enables 1.4 GW of new renewable capacity, supporting the UK's 2030 target of 50 GW offshore wind, including 5 GW floating wind. It also facilitates the electrification of multiple oil and gas platforms, cutting sector emissions by 50% by 2030. This work directly advances SDG 7.2 by strengthening the Scottish and UK floating wind supply chain, driving innovation and resilience in clean energy.

### SDG 7.2 Offshore Wind Farm client, Geophysical & Geotechnical Expertise, Taiwan

Xodus teams in London and Houston worked together to provide specialist geophysical and geotechnical expertise for a major new windfarm in Taiwan with a planned capacity of 1,022 MW. The work enabled safe and environmentally responsible cable route design and installation. Once operational, the project will deliver clean electricity to over one million homes annually, reducing reliance on fossil fuels and supporting net-zero ambitions. Beyond energy

generation, it is driving supply chain development through investment in manufacturing, workforce training, and technology transfer, positioning the region as a hub for offshore wind innovation. As one of the largest projects of its kind, it demonstrates the scalability of renewables in emerging markets and exemplifies international collaboration and sustainable infrastructure delivery, contributing significantly to SDG 7.2.

### SDG 7.2 Stonepeak Offshore Wind Project, Technical & Environmental Advisory, USA

Xodus provided technical and environmental due diligence to Stonepeak for its acquisition of a 50% stake in Dominion Energy's Coastal Virginia Offshore Wind Project (CVOW), a 2.6GW fixed-bottom offshore wind farm located 27 miles off Virginia Beach. The project includes 176 Siemens Gamesa turbines, each boosted to 14.7MW capacity, supported by monopile foundations suited to the site's bathymetry. Through detailed assessments of permitting, construction contracts, energy yield, grid connection and CAPEX/OPEX profiles, Xodus helped accelerate project readiness. This directly supports SDG 7.2 by enabling large-scale offshore wind deployment and advancing clean energy infrastructure.



### SDG 7.3 Oil & Gas Operator, Energy Efficiency Studies, UK

Xodus supported a North Sea operator in meeting UK Pollution Prevention and Control (PPC) permit requirements by delivering energy efficiency studies

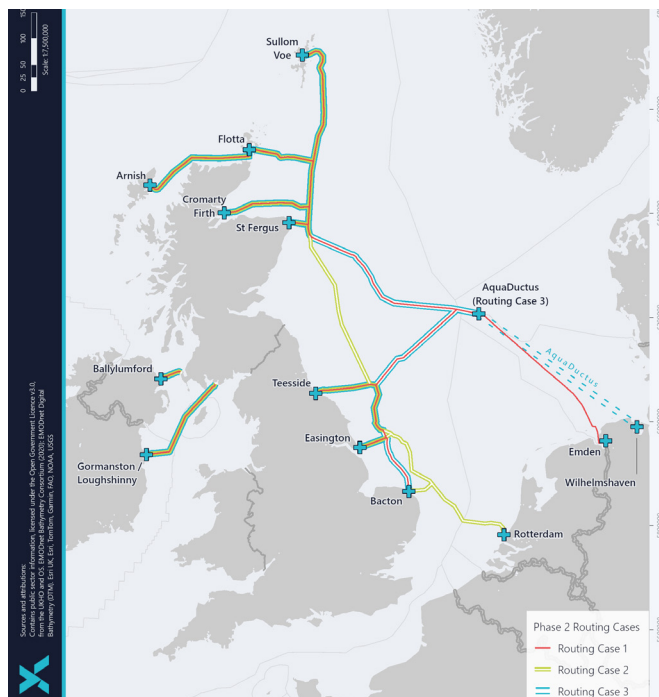
across four North Sea assets. The studies identified and ranked emissions and energy reduction opportunities, implemented digital monitoring for real-time optimisation and ensured compliance with PPC and ESOS regulations. Proposed retrofits and operational changes would achieve up to 20+% energy consumption reduction, lowering carbon intensity and supporting net-zero goals. These initiatives align with international frameworks and directly contribute to SDG 7.3, accelerating global energy efficiency improvements in high-emission sectors.



### SDG 7.3 Oil & Gas Operator, Energy Efficiency Programme, Middle East

Xodus delivered a comprehensive energy efficiency program across upstream assets in Qatar, directly supporting SDG 7.3: doubling the global rate of improvement in energy efficiency by 2030. We conducted detailed audits of power generation systems, mechanical drives, and flare systems, applying digital tools to identify and rank energy-saving opportunities. To ensure lasting impact, helping the client meet regulatory requirements and advance net-zero commitments.

export, this initiative directly supports SDG 9.1, which promotes the development of sustainable and resilient infrastructure to foster economic development and human well-being, with a focus on affordable and equitable access for all.



### SDG 9.1 Net Zero Technology Centre Hydrogen Backbone Link, Analysis of Hydrogen Transport Infrastructure, UK

Xodus supported the Net Zero Technology Centre (NZTC) in analysing hydrogen transport infrastructure to enable cost-effective export of Scottish-produced hydrogen to the UK and mainland Europe. The study identified 36 development options, including pipeline routes and export destinations, with a direct route to Germany via Orkney emerging as the most economical (£2.8 billion CAPEX). The project is expected to generate over 700 Scottish jobs and contribute significantly to the green economy. By advancing strategic infrastructure for hydrogen

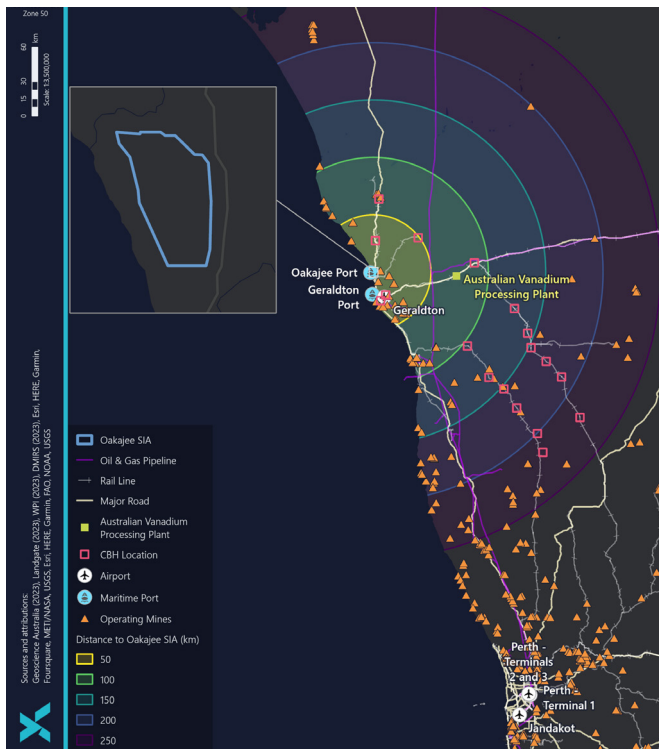
### SDG 9.1 INPEX Bonapart Carbon Capture & Storage (CCS), Assess & Concept Select Support, Australia

Xodus supported INPEX through the Bonaparte Carbon Capture and Storage (CCS) Assess and Concept Select phases, maturing the design basis and flow assurance strategies, and supporting understanding of the regulatory pathways for a large-scale CO<sub>2</sub> storage hub near Darwin. This work established the foundation for resilient, low-carbon infrastructure critical to industrial decarbonisation and directly supports SDG 9.1. By enabling reliable CCS infrastructure, the project strengthens sustainable industrial systems and supports long-term climate resilience in the region.

### SDG 9.4 WINTOG Electrifying UKCS Assets Project, Technical Advisory, UK

The WINTOG Electrifying UKCS Assets project is a pioneering effort to decarbonise offshore oil and gas operations by replacing traditional gas turbine power generation with renewable electricity from floating wind. Our team provided technical expertise to assess integration feasibility, optimise electrical systems, and model emissions reductions, enabling up to 80% lower operational CO<sub>2</sub> emissions compared to conventional systems. By embedding clean power solutions into mature infrastructure, we supported the UK's North Sea Transition Deal and advanced SDG 9.4, enhancing industrial efficiency and resilience. This work positions the UK Continental Shelf as a leader in offshore energy innovation.





#### SDG 9.4 Warradarge Green Energy Project, Concept Development & Integration Planning, Australia

Xodus initiated the MercurHy Hydrogen Project (now Warradarge Green Hydrogen Project) through concept development and integration planning. This renewable hydrogen initiative will leverage renewable energy from the existing Warradarge wind farm site in the Mid-West of Western Australia. Our early works enabled project initiation, technical feasibility, infrastructure design, and commercial structuring for green hydrogen production, now supported by our development partners. The first phase of the project is targeting green hydrogen for use in the mobility sector in dual fuel trucks, with plans to supply partners for a green iron plant during later phases of the project. This project strengthens resilient, low-carbon infrastructure essential for industrial decarbonisation and directly supports SDG 9.1 by fostering sustainable energy systems and regional economic growth.

#### SDG 11.4 Offshore Energy Company, Knowledge Management Initiative, Australia

Xodus' Knowledge Management initiative advances the sustainable use and protection of marine environments, contributing directly to SDG 11.4: Sustainable Cities and Oceans. Through systematic

reviews of scientific and socio-economic literature, we maintain up to date and scientifically relevant baseline database on Western Australia's marine ecosystems and Matters of National Environmental Significance, including protected species, biologically important areas, marine reserves, cultural heritage, and First Nations heritage. This enables evidence-based decision-making for an offshore energy client. This ensures development is guided by scientifically validated environmental data, providing a robust foundation for impact assessments and management strategies that minimise ecological and socio-economic risks while safeguarding marine biodiversity.



**OBP**  
OFFSHORE  
BIRD PORTAL

**SDG 11.4 Offshore Bird  
Portal (OBP), Concept &  
Development, UK**

The Offshore Bird Portal (OBP) is a collaborative platform that centralises seabird data from UKCS offshore assets to inform decommissioning decisions and minimise ecological disturbance. Originated and developed by Xodus, the initiative safeguards nesting sites while ensuring compliance with environmental regulations. By promoting industry transparency, providing long-term datasets for research, and advancing best practice in biodiversity stewardship during asset removal, OBP strengthens efforts to protect natural heritage in line with SDG 11.4.





### **SDG 12.6 Non-operator Private Entity, ESG Mapping, UK**

Xodus partnered with a non-operator private entity to design and implement a robust Environmental, Social, and Governance (ESG) framework, enabling the company to integrate sustainability into their operations and reporting cycle in line with SDG 12.6. The project delivered a materiality assessment to identify priority ESG issues, established measurable targets for emissions reduction, governance, and social performance, and mapped Scope 1, 2, and 3 emissions to inform decarbonization strategies. A digital HSE data-sharing platform was introduced to enhance transparency and stakeholder engagement, alongside a strategic investment roadmap for sustainable initiatives. These actions strengthened compliance with global frameworks such as Task Force on Climate-related Financial Disclosures (TCFD) and the UN SDGs, improved readiness for investor reporting, and positioned the organisation as building towards assured, disclosable sustainability reporting.

### **SDG 12.6 Renewable Energy Developer, Materiality Reporting Support, UK**

Xodus supported a leading renewable energy developer with enhanced ESG transparency through a materiality assessment and structured reporting framework. The project identified 15 priority ESG topics via stakeholder engagement and aligned disclosures with GRI and TCFD standards. Key deliverables included a materiality matrix and a clear reporting process, improving readiness for investor and regulatory requirements. By embedding sustainability into decision-making and establishing consistent reporting cycles, the company demonstrates accountability and continuous improvement, directly contributing to SDG 12.6.

### **SDG 13.3 Oil & Gas Operator, Digital Emissions Reduction Action Plan D-ERAP, UK**

Xodus deployed its digital Emissions Reduction Action Plan D-ERAP module within the XAMIN Emissions platform to help a major operator assess and reduce greenhouse gas emissions across offshore assets.

Combining engineering expertise with digital tools, the project delivered real-time emissions visibility, prioritised high-impact reduction actions and aligned strategies with net-zero targets. Interactive dashboards and structured training improved climate literacy and embedded emissions management into daily workflows. By integrating data into long-term planning and investment decisions, D-ERAP supports continuous improvement and regulatory compliance advancing SDG 13.3 by building organisational capacity for climate action.

### **SDG 14.2 Crown Estate Scotland, Collaboration for Environmental Mitigation and Nature Inclusive Design, UK**

Partnering with Crown Estate Scotland, Xodus helped develop Collaboration for Environmental Mitigation and Nature Inclusive Design (CEMNID) to embed nature-inclusive design and mitigation strategies into offshore wind projects. This approach aims to enhance marine biodiversity, reduces ecological impacts and promotes resilience in offshore and coastal ecosystems. By integrating environmental considerations early in planning, CEMNID supports sustainable offshore development and directly advances SDG 14.2 and sets a benchmark for sustainable offshore practices.

### **SDG 14.2 Evolv Energies, Electromagnetic Field (EMF) Emissions Study, UK**

Xodus conducted a study on EMF emissions from 66 kV dynamic subsea cables in floating offshore wind projects. The review analysed cable designs and configurations, assessed EMF theory for AC/DC systems, and identified knowledge gaps in modelling and environmental impacts on marine species. Practical recommendations were developed to improve measurement, modelling, and industry collaboration, supporting regulatory compliance and informed decision-making. By addressing EMF effects on marine life and proposing mitigation strategies, the study advances SDG 14.2 by safeguarding ocean biodiversity and ensuring offshore wind growth aligns with sustainable marine ecosystem management.



## APPENDIX A: SUSTAINABILITY DATA & PERFORMANCE METRICS

We have summarised all relevant metrics in relation to the GRI standards below, to support transparent, comparable reporting across our key sustainability topics.

### Disclosure 2-7: Employee Headcount

NUMBER	EMEA	APAC	US	GLOBAL XCELLENCE HUBS & BUSINESS FUNCTIONS	EVOLV
Employees <sup>1</sup>	254	76	21	107	16
Permanent	242	60	16	103	16
Temporary	7	0	1	2	0
Full-time	213	54	16	77	16
Part-time	29	6	0	26	0

NUMBER	MALE	FEMALE
Employees	277	197
Permanent	254	183
Temporary	2	8
Full-time	246	130
Part-time	8	53

### 2-8: Workers Who Are Not Employees

Our non-employee workers include 114 Associates and 27 zero hours workers, who carry out technical and for the most part very niche areas or work. The fluctuations in this part of our workforce are due to the requirements of our client scopes of work.

### 201: Economic Performance

The revenue not including investment areas was £65,441,566.

### 202-1: Ratios of standard Entry Level Wage by Gender Compared to Local Minimum Wage

Our ratios of standard entry level wage compared to local minimum wage are for male and female respectively.

LOCATIONS	WAGE RATIO MALE	WAGE RATIO FEMALE
US, Texas	3.4	3.4
US, Massachusetts	1.7	1.7
UK	1.5	1.5
Australia	1.5	1.4

1. Full-time, Part-time Fixed-term (including students) employees.

2. UAE and Qatar No entry level employees.



### 302-1: Energy Consumption Within the Organisation

1277 GJ

### 302-2: Energy Consumption<sup>3</sup> Outside of the Organisation

15,542 GJ

### 302-3: Energy<sup>4</sup> Intensity Ratio Reflecting Energy Consumption Inside & Purchased Energy Outside of Organisation

Based on using revenue as the denominator, the energy intensity ratio is 257.01 GJ/million £<sup>5</sup>

Alternatively, using FTE as the denominator, the energy intensity ratio is 38.16 GJ/FTE

### 305-2: Energy Indirect (Scope 2<sup>6</sup>) Gross GHG Emissions (Operational Control)

GROSS GHG EMISSIONS	SCOPE 2 EMISSIONS <sup>7</sup>
Location-based emission factors	249.4 t CO <sub>2</sub> -e
Market-based emissions factors	230.7 t CO <sub>2</sub> -e

### 305-3: Other Indirect (Scope 3<sup>8</sup>) GHG Emissions<sup>9</sup>

1,245 t CO<sub>2</sub>-e from all forms of business travel, employee commuting and waste.

Revenue based-GHG emissions intensity ratio for the organisation. 3.53 t CO<sub>2</sub>-e/million £

Organisation-specific metric (the denominator) chosen to calculate the ratio. Revenue in UK pounds

FTE based-GHG emissions intensity ratio for the organisation. 0.52 t CO<sub>2</sub>-e/FTE

Organisation-specific metric (the denominator) chosen to calculate the ratio. FTE

Types of GHG emissions included in the intensity ratio; whether direct (Scope 1), energy indirect (Scope 2), and/or other indirect (Scope 3). Scope 2

Gases included in the calculation; whether CO<sub>2</sub>, CH<sub>4</sub>, N<sub>2</sub>O, HFCs, PFCs, SF<sub>6</sub>, NF<sub>3</sub>, or all. Emissions factors that are used are provided in CO<sub>2</sub>-e from a variety of sources which will have variable coverage of the stated gasses.

3. GHG Protocol (2013) The Greenhouse Gas Protocol; A Corporate Accounting and Reporting Standard. World Resources Institute (WRI) & World Business Council for Sustainable Development Revised Edition. Where primary data is not available due to offices being a serviced facility inclusive of electricity supply, Xodus forecasts electricity usage based on office size, number of FTE and seasonality of demand. Primary sources, including electricity suppliers, grid operators and airline agents have been preferentially used, but when not available conversion factors have been used with the following hierarchy of selection of Supplier specific factor, Local government factors, other factors.

4. Purchased electricity, noting Xodus does not directly consume fuel, or purchase heating, cooling and steam.

5. Revenue in UK pounds.

6. Emissions factors that are used are provided in CO<sub>2</sub>-e from a variety of sources which will have variable coverage of the stated gasses. Emissions factors and GWP

are determined based on information from electricity suppliers, local government or grid operators, where available. If not available, alternative third party databases of emissions factors were sourced and used. GHG Protocol, with bespoke emissions calculator developed by Xodus. Where information is not available to enable the calculation of emissions, assumptions were made to fill data gaps. This includes benchmarks to provide an appropriate analogy for the missing data.

7. GHG Protocol (2015) Scope 2 Guidance. World Resources Institute (WRI) & World Business Council for Sustainable Development Revised Edition.

8. Emissions factors that are used are provided in CO<sub>2</sub>-e from a variety of sources which will have variable coverage of the stated gasses. Emissions factors and GWP are determined based on information from Jurisdictional Government data and travel providers. Carbon Footprint GHG Protocol, with bespoke emissions calculator developed by Xodus.

9. Xodus does not have any biogenic CO<sub>2</sub> emissions.



### 306-3: Waste Generated

### 306-4: Waste Diverted from Disposal

### 306-5: Waste Directed to Disposal

WASTE	AMOUNT IN TONNES	GENERAL WASTE	MIXED RECYCLING	FOOD WASTE	PAPER & CARDBOARD
Total Waste Generated	7.2	4.33	1.92	0.67	0.28
Total Waste <sup>10</sup> Diverted from Disposal	2.87	N/A	1.92	0.67	0.28
Total Waste Directed to Disposal (100% non-hazardous)	4.33 <sup>11</sup>	N/A	N/A	N/A	N/A

### 401-1: New Employee<sup>12</sup> Hires & Employee Turnover

	FEMALE	MALE	EMEA	APAC	US	GLOBAL XCELLENCE HUBS & BUSINESS FUNCTIONS	EVOLV	AGE GROUP UNDER 30 YEARS OLD	AGE GROUP 30-50 YEARS OLD	AGE GROUP OVER 50 YEARS OLD
Total number new employee hires	42	30	36	6	5	22	3	39	26	7
Rate of new employee hires	22%	12%	14%	10%	29%	21%	19%	38%	9%	11%
Total number of employee turnover <sup>13</sup>	15	42	33	10	3	9	2	11	36	10
Rate of employee	8%	16%	13%	17%	18%	9%	13%	11%	13%	16%

### 401-3: Parental Leave

- Of the 8 females that took parental leave in 2024, 1 returned to work, 1 resigned and the remaining 6 continued their leave into 2025.
- All the 11 males that took parental leave returned to work in 2024.
- Of the 19 people who took parental leave in 2024, only 1 person left the company during the paternity leave.

<sup>10</sup>. There is no generation of hazardous waste in our office-based operations.

<sup>11</sup>. All waste directed offsite, no onsite waste disposal option in our office-based operations.

<sup>12</sup>. Employees include full, part time and fixed term.

<sup>13</sup>. Leavers are those employees who resigned voluntarily, including retirement, excluding 8 individuals whose fixed term contract ended.



#### 403-9: Work-Related Injuries

#### 403-10: Work-Related Ill Health

	EMPLOYEES	NON-EMPLOYEES
Hours worked	789786	131699
Number of fatalities or high consequence work related injuries or ill health <sup>14</sup> in the Xodus workforce <sup>15</sup> in 2004	0	0
Recordable work-related injuries number (rate <sup>16</sup> )	2 <sup>16</sup> (0.506)	0
Actions identified and carried out from the incident investigation process	Finger repetitive strain injury – increased awareness for the individual and new equipment Ankle injury – increased awareness and enhanced risk assessment	N/A
The number of cases of recordable work-related ill health in the Xodus workforce	1 muscular skeletal due to manual handling	0

Actions identified and carried out from the incident investigation process: manual handling – the risk was eliminated by changing the transport method.

#### 404-1: Average Hours of Training<sup>18</sup> Per Year Per Employee

We worked towards the target of 3 days per employee per year in 2024 and have initiated tracking for this data in 2025.

#### 404-2: Programs For Upgrading Employee Skills & Transition Assistance Programs

Type and scope of programs implemented, IMechE Chartership programme, ICheme Chartership Programme, and assistance provided to upgrade employee skills.	Project Management Mentoring Programme, Internal Coaching programme, Elev8 programme, annual training budget for technical, behavioural, management and leadership skills, Leadership team coaching programme, Me as a Coach (MAAC) programme, Future Industry Leaders Programme (FILP), ECITB Active Cup.
Transition assistance programs provided to facilitate continued employability and the management of career endings resulting from retirement or termination of employment.	STEM Returners Programme – all of the above support the enhancement of skills capability and diverse advancement paths throughout the company.

<sup>14</sup>. As Xodus is mostly an office-based consultancy our workplace hazards are low risk. Main hazards include desk equipment usage, limited chemical and manual handling.

<sup>15</sup>. Employees and non-employees with no exclusions.

<sup>16</sup>. Calculated using 200,000 hours worked.

<sup>17</sup>. Too few incidents to be able to categorise.

<sup>18</sup>. Internal, external, mandatory and on the job training.



#### 403-3: Percentage of Employees Receiving Regular Performance & Career Development Reviews

Percentage of total employees by gender and by employee category who received a regular performance and career development review during the reporting period:

- 98 % of employees (50:50 gender split)
- 8 individuals (50:50 male and females) did not receive reviews due to a dispensation or reorganisation

#### 405-1: Diversity of Governance Bodies & Employees

Percentage of individuals within the Executive Team<sup>19</sup> in each of the following diversity categories:

- 67% were female
- 33% were male
- 50% of the team were between 30-50
- 50% were over 50 years of age

Percentage of employees in each of the following diversity categories:

- 40% were female
- 60% were male
- 21% under 30 years old
- 62% 30-50 years old
- 17% over 50 years old

#### 405-2: Ratio of Basic Salary & Remuneration of Women to Men<sup>20</sup>

	UK	AUSTRALIA	JAPAN	US	UAE & QATAR
Under 30 years old	1 : 1.1	1 : 1.1	1 : 1.0	1 : 0.8	N/A
30-50 years old	1 : 1.3	1 : 1.3	1 : 0.4	N/A	N/A
Over 50 years old	1 : 1.4	1 : 0.7	1 : 1.0	N/A	N/A

N/A as all employees were male.

<sup>19</sup> In our UNGC Communication on Progress, we have defined the roles of women in levels 1 and 2 below the administrative and supervisory bodies as Vice Presidents of our three regions, Global Directors of our functional Xcellence Hubs and our Divisional Managers. The data is presented for the permanent employees in the workforce and constitutes 11 women out of a total of 49 individuals in managerial roles.

<sup>20</sup> Full, part-time and fixed term (not students) employees.





## APPENDIX B: GRI INDEX

Xodus 2024 sustainability data has been reported in alignment with the Global Reporting Initiative (GRI) Standards. The reporting focuses on material sustainability priorities relevant to our business and stakeholders. There is no industry-specific GRI standard applicable to our operations; therefore, we have reported against the general GRI topic-related standards that address economic, environmental, and social impacts.

GRI STANDARD	INFORMATION LOCATION	OMISSIONS/REMARKS
<b>2 GENERAL DISCLOSURE</b>		
2-1 Organisational Details	Business Overview	
2-2 Entities included in the organization's sustainability reporting	Business Overview	
2-3 Reporting period, frequency and contact point	Sustainability at Xodus	
2-4 Restatements of information	–	As this is our first report there are no restatements
2-5 External assurance	–	The sustainability report has not been subjected to external assurance
2-6 Activities, value chain and other business relationships	Various sections of the report	
2-7 Employees	Appendix A Sustainability Data	
2-8 Workers who are not employees	Appendix A Sustainability Data	
2-9 Governance structure and composition	Governance	
2-10 Nomination and selection of the highest governance body	Governance	
2-11 Chair of the highest governance body	Governance	
2-12 Role of the highest governance body in overseeing	Governance	
2-13 Delegation of responsibility for managing impacts	Governance	
2-14 Role of the highest governance body in sustainability reporting	Governance	
2-15 Conflicts of interest	Governance	
2-16 Communication of critical concerns	Governance	
2-17 Collective knowledge of the highest governance body	Governance	
2-18 Evaluation of the performance of the highest governance body	–	Not disclosed due to confidentiality
2-19 Remuneration policies	Social	
2-20 Process to determine remuneration	Social	
2-21 Annual total compensation ratio	–	Not disclosed as information is not available
2-22 Statement on sustainable development strategy	Sustainability at Xodus	
2-23 Policy commitments	Governance	
2-24 Embedding policy commitments	Governance	
2-25 Processes to remediate negative impacts	Governance	



GRI STANDARD	INFORMATION LOCATION	OMISSIONS/REMARKS
2-26 Mechanisms for seeking advice and raising concerns	Governance	
2-27 Compliance with laws and regulations	Governance	
2-28 Membership associations	Partnerships	
2-29 Approach to stakeholder engagement	Partnerships	
2-30 Collective bargaining agreements	–	Collective bargaining is not a material issue for our business
<b>3 MATERIALITY</b>		
3-1 Process to determine material topics	Sustainability at Xodus	
3-2 List of material topics	Sustainability at Xodus	
3-3 Management of material topics	Sustainability at Xodus, Various Sections of the Report	
<b>201 ECONOMIC PERFORMANCE</b>		
201-1 Direct economic value generated and distributed	Business Overview, Appendix A Sustainability Data	
201-2 Financial implications and other risks and opportunities due to climate change	Various Sections of the Report	
201-3 Defined benefit plan obligations and other retirement plans	–	Not material; only standard pension contributions from employer
201-4 Financial assistance received from government	–	Not material
<b>202 MARKET PRESENCE</b>		
202-1 Ratios of standard entry level wage by gender compared to local minimum wage	Appendix A Sustainability Data	
202-2 Proportion of senior management hired from the local community	Governance	
<b>204 PROCUREMENT PRACTICES</b>		
204-1 Proportion of spending on local suppliers	Partnerships	
<b>205 ANTI-CORRUPTION</b>		
205-1 Operations assessed for risks related to corruption	Governance	
205-2 Communication and training about anti-corruption policies and procedures	Governance	Employees who are absent from the business e.g. on long term leave or secondment, who are required to complete the training on their return.
205-3 Confirmed incidents of corruption and actions taken	Governance	
<b>206 ANTI-COMPETITIVE BEHAVIOUR</b>		
206-1 Legal actions for anti-competitive behaviour, anti-trust, and monopoly practices	Governance	



GRI STANDARD	INFORMATION LOCATION	OMISSIONS/REMARKS
<b>302 ENERGY</b>	Environment	
<b>302-1 Energy consumption within the organization</b>	Appendix A Sustainability Data	
<b>302-2 Energy consumption outside of the organization</b>	Appendix A Sustainability Data	
<b>302-3 Energy intensity</b>	Appendix A Sustainability Data	
<b>302-4 Reduction of energy consumption</b>	–	For this first sustainability report we have assumed 2024 as our base year. Reductions will be reported in future years.
<b>302-5 Reductions in energy requirements of products and services</b>	–	
<b>305 EMISSIONS</b>		
<b>305-1 Direct (Scope 1) GHG emissions</b>	–	We have no direct Scope 1 greenhouse gas emissions.
<b>305-2 Energy indirect (Scope 2) GHG emissions</b>	Environment, Appendix A Sustainability Data	
<b>305-3 Other indirect (Scope 3) GHG emissions</b>	Environment, Appendix A Sustainability Data	
<b>305-4 GHG emissions intensity</b>	Environment, Appendix A Sustainability Data	
<b>305-5 Reduction of GHG emissions</b>	–	As 2024 is our baseline year, Scope 2 alone was selected as the boundary of assessment is now stable with a high quality of confidence. We plan to increase the Scope 3 categories for disclosure and emissions reductions as the quality of the inventory data improves with time.
<b>305-6 Emissions of ozone-depleting substances (ODS)</b>	–	Our offices are leased commercial spaces, and all building systems—including HVAC, refrigeration, and fire suppression—are maintained by central facilities management. We do not operate or service these systems directly. Consequently, emissions of (ODS) from our operations are considered negligible.
<b>305-7 Nitrogen oxides (NOx), sulfur oxides (SOx), and other significant air emissions</b>	–	As our offices are leased and maintained by central facilities management, we do not directly operate any combustion equipment or industrial processes. Any emissions of NOx, SOx, or other air pollutants associated with building operations are therefore considered negligible.
<b>306 WASTE (2020)</b>		
<b>306-1 Waste generation and significant waste-related impacts</b>	Environment, Appendix A Sustainability Data	
<b>306-2 Management of significant waste-related impacts</b>	Environment, Appendix A Sustainability Data	
<b>306-3 Waste generated</b>	Appendix A Sustainability Data	
<b>306-4 Waste diverted from disposal</b>	Appendix A Sustainability Data	
<b>306-5 Waste directed to disposal</b>	Appendix A Sustainability Data	



GRI STANDARD	INFORMATION LOCATION	OMISSIONS/REMARKS
<b>401 EMPLOYMENT</b>		
401-1 New employee hires and employee turnover temporary or part-time employees	Appendix A Sustainability Data	Data was not collected on any indicators of diversity other than on gender and age.
401-2 Benefits provided to full-time employees that are not provided to are not provided to temporary or part-time employees	Social	Fixed term employees (temporary) are also covered for income protection. Fixed term student employees have access to flexible working, employee assistance programme and pension scheme.
401-3 Parental leave	Social, Appendix A Sustainability Data	The total number of employees that returned to work after parental leave ended that were still employed 12 months after their return-to-work data is incomplete due to timing, and will be reported in the next disclosure.
<b>402 LABOUR/MANAGEMENT RELATIONS</b>		
402-1 Minimum notice periods regarding operational changes	Social	
<b>403 OCCUPATIONAL HEALTH &amp; SAFETY</b>		
403-1 Occupational health and safety management system	Social	
403-2 Hazard identification, risk assessment, and incident investigation	Social	
403-3 Occupational health services	Social	
403-4 Worker participation, consultation, and communication on occupational health and safety	Social	
403-5 Worker training on occupational health and safety	Social	
403-6 Promotion of worker health	Social	
403-7 Prevention and mitigation of occupational health and safety impacts directly linked by business relationships	Social	
403-8 Workers covered by an occupational health and safety management system	Governance	
403-9 Work-related injuries	Appendix A Sustainability Data	
403-10 Work-related ill health	Appendix A Sustainability Data	
<b>404 TRAINING &amp; EDUCATION</b>		
404-1 Average hours of training per year per employee	Social	
404-2 Programs for upgrading employee skills and transition assistance programs	Social	
404-3 Percentage of employees receiving regular performance and career development reviews	Appendix A Sustainability Data	



GRI STANDARD	INFORMATION LOCATION	OMISSIONS/REMARKS
<b>404 TRAINING AND EDUCATION</b>		
404-1 Average hours of training per year per employee	Social	
404-2 Programs for upgrading employee skills and transition assistance programs	Social	
404-3 Percentage of employees receiving regular performance and career development reviews	Appendix A Sustainability Data	
<b>405 DIVERSITY AND EQUAL OPPORTUNITY</b>		
405-1 Diversity of governance bodies and employees	Appendix A Sustainability Data	Data was not collected in relation to other indicators of diversity (such as minority or vulnerable groups).
405-2 Ratio of basic salary and remuneration of women to men	Appendix A Sustainability Data	
<b>406 NON-DISCRIMINATION</b>		
406-1 Incidents of discrimination and corrective actions taken	Social	
<b>411 RIGHTS OF INDIGENOUS PEOPLES</b>		
411-1 Incidents of violations involving rights of indigenous peoples	Social	
<b>418 CUSTOMER PRIVACY</b>		
418-1 Substantiated complaints concerning breaches of customer privacy and losses of customer data	Governance	



Xodus (Xodus Group Limited) is an intermediate holding company within the Xodus Group, comprising Xodus Group Holdings Limited and its subsidiaries. Xodus controls the operating results of the entire group of Xodus operating companies including entities in Australia, UAE, and the US.

Xodus' ultimate parent company is Subsea 7 S.A. a Company registered in Luxembourg whose common shares trade on the Oslo Børs and as American Depositary Receipts (ADRs) over-the-counter in the USA. The address of its registered office is 412F, route d'Esch, L-1471 Luxembourg.

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For any questions regarding this report or its content, please contact:

**Rebecca Hewlett**

Global Sustainability Director

[rebecca.hewlett@xodusgroup.com](mailto:rebecca.hewlett@xodusgroup.com)

[www.xodusgroup.com](http://www.xodusgroup.com)