

# Non-financial information statement

This Annual Report contains the information required to comply with the Companies, Partnerships and Groups (and Non-Financial Reporting) Regulations 2016, as contained in sections 414CA and 414CB of the Companies Act 2006. The table below provides key references to information that, taken together, comprises the Non-Financial Information Statement for 2021.\*

Reporting requirement	Group policies that guide our approach	Information and risk management, with page references
<b>Environmental matters</b>	<ul style="list-style-type: none"> <li>Environmental Policy Statement</li> <li>Environmental Sustainability statement</li> <li>Health &amp; Safety Policy statement</li> <li>Quality Policy statement.</li> </ul>	<ul style="list-style-type: none"> <li>Risk management &amp; principal risks, pages 44 to 55</li> <li>Sustainable and responsible business, pages 28 to 37</li> <li>Section 172 statement, page 69</li> <li>Company Purpose, page 71</li> <li>Our business model, pages 8 to 9</li> </ul>
<b>Employees</b>	<ul style="list-style-type: none"> <li>Absence Policy</li> <li>Alcohol &amp; Substance Abuse Policy</li> <li>Annual Leave Policy</li> <li>Bullying &amp; Harassment Policy</li> <li>Capability Policy</li> <li>Code of Conduct</li> <li>Covid-19 Policy statement</li> <li>Disciplinary Policy</li> <li>Equal Opportunities Policy</li> <li>Family Leave Policy</li> <li>Flexible Working Policy</li> <li>Gender pay gap report</li> <li>Gifts &amp; Entertainment Policy</li> <li>Grievance Policy</li> <li>Health &amp; Safety Policy</li> <li>Performance Planning Policy</li> <li>Referral &amp; Reward Policy</li> <li>Retirement Policy</li> <li>Whistleblowing Policy</li> <li>Working time regulations.</li> </ul>	<ul style="list-style-type: none"> <li>Risk management &amp; principal risks, pages 44 to 55</li> <li>Sustainable and Responsible business, pages 28 to 37</li> <li>Section 172 statement, page 69</li> <li>Company Purpose, page 71</li> <li>Our business model, pages 8 to 9</li> </ul>
<b>IT, cyber security &amp; data protection</b>	<ul style="list-style-type: none"> <li>Confidential Information Policy</li> <li>Data Protection Policy</li> <li>Email and Internet Policy</li> <li>Mobile Phone Policy.</li> </ul>	<ul style="list-style-type: none"> <li>Risk management &amp; principal risks, pages 44 to 55</li> </ul>
<b>Social matters</b>	<ul style="list-style-type: none"> <li>Human Rights Policy</li> <li>Charitable Donations Policy</li> <li>Employee Volunteering Policy.</li> </ul>	<ul style="list-style-type: none"> <li>Sustainable and responsible business, pages 28 to 37</li> </ul>
<b>Respect for human rights</b>	<ul style="list-style-type: none"> <li>Human Rights Policy</li> <li>Sanctions Policy</li> <li>Modern Slavery Policy</li> <li>Modern Slavery Act Compliance Statement.</li> </ul>	<ul style="list-style-type: none"> <li>Risk management &amp; principal risks, pages 44 to 55</li> <li>Sustainable and responsible business, pages 28 to 37</li> <li>Section 172 statement, page 69</li> <li>Company Purpose, page 71</li> </ul>
<b>Anti-corruption and anti-bribery matters</b>	<ul style="list-style-type: none"> <li>Anti-Bribery &amp; Corruption Policy</li> <li>Anti-money Laundering Policy</li> <li>Conflict Materials Policy</li> <li>Corporate Criminal Offence Policy</li> <li>Employee Share Dealing code</li> <li>Gifts &amp; Entertainment Policy</li> <li>Whistleblowing Policy.</li> </ul>	<ul style="list-style-type: none"> <li>Risk management &amp; principal risks, pages 44 to 55</li> <li>Sustainable and responsible business, pages 28 to 37</li> <li>Our business model, pages 8 to 9</li> <li>Section 172 statement, page 69</li> <li>Company Purpose, page 71</li> </ul>
<b>Description of the business model</b>		<ul style="list-style-type: none"> <li>Our business model, pages 8 to 9</li> </ul>
<b>Description of the principal risks in relation to the above matters, including business relationships, products and services likely to affect those areas of risk, and how the company manages the risks</b>		<ul style="list-style-type: none"> <li>Risk management &amp; principal risks, pages 44 to 55</li> <li>Sustainable and responsible business, pages 28 to 37</li> <li>Climate change, pages 29</li> </ul>
<b>Non-financial key performance indicators</b>		<ul style="list-style-type: none"> <li>Sustainable and responsible business, pages 28 to 37</li> <li>Greenhouse gas report, page 41</li> <li>Key Performance Indicators, pages 42 to 43</li> </ul>

\* The policies listed above are available to employees via our intranet, alongside corporate policies being available on our website (<https://www.xaar.com/en/about/corporate-policies/>). Compliance with our policies is monitored through the implementation of annual compliance statements, through our internal audit function, and locally by our General Managers.