



Environmental, Social and Governance Report 2025

Coming together to make a
difference in the world we
share.

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Commitment to taking care of customers, team members and the local and global communities we collectively serve

Environmental, Social, and Governance (ESG) is far more than a standalone initiative at Sterling Lexicon; it is woven into our culture, strategy, and every business decision we make.

Our ESG framework reflects a universal commitment to responsible practices aligned with recognized global standards. It addresses our role in ensuring ethical business operations, fostering people-focused initiatives, championing environmental sustainability, and empowering communities through meaningful contributions.

At Sterling Lexicon, we recognize that our responsibility extends beyond delivering exceptional relocation services. By adopting an ESG-driven approach, we ensure that every relocation service contributes to our overarching goal of creating happy, productive people.



Our Environmental, Social and Governance program

The value of caring is at the heart of everything we do at Sterling Lexicon – we care for the people we work with, the planet we inhabit and the community members we live alongside.

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Commitment to taking care of customers, team members and the local and global communities we collectively serve

Sterling Lexicon is dedicated to achieving positive, sustainable impacts for our clients, employees, suppliers, and the communities we serve.

We will achieve this by:

- ▶ Driving positive changes in the global mobility industry
- ▶ Developing more sustainable practices
- ▶ Supporting our communities and the people who live in them
- ▶ Encouraging innovation and diverse thinking



Responsible business

Setting high ethical standards to protect our brand, our people and our clients.



Our people

Building a diverse, ethical and healthy culture that encourages a positive employment experience.



Our planet

Committed to sustainable business practices to minimize the environmental impact in all our business activities.



Our communities

Recognizing that our talent can also be used to make invaluable contributions within the community.



Responsible Business

Aligning our business practices with standards set by the world's most respected organizations—driven by a steadfast commitment to doing the right thing

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Commitment to the United Nations Global Compact Agreement (EMEA & APAC entities)

The UN Global Compact Agreement is a call to companies to align their strategies and operations with ten universal principles related to human rights, labour, environment and anti-corruption.

Our Environment, Social and Governance Report provides an overview of the initiatives Sterling Lexicon has implemented to ensure the four principles of the United Nations Global Compact Agreement are covered through our policies and management systems.

Upholding these principles guides Sterling Lexicon's business framework for the development, implementation, and disclosure of human rights, labour, environment and anti-corruption policies and practices.

Please find following our Policy Alignment Index.

WE SUPPORT



Sterling Lexicon EMEA & APAC is pleased to affirm our continuing support for the Ten Principles of the United Nations Global Compact (UNGC). Sterling Lexicon has upheld the principles of, and been a formal signatory of, the United Nations Global Compact since 2013.

Policy Alignment Index

UN Global Compact Agreement Principle	Sterling Lexicon Policy	Report Reference
Human Rights Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights; Principle 2: Make sure that they are not complicit in human rights abuses	Code of Conduct and Business Ethics Supplier Code of Conduct Anti-Bribery and Corruption Policy	Pages 11 and 13
Labour Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining; Principle 4: the elimination of all forms of forced and compulsory labour; Principle 5: the effective abolition of child labour; Principle 6: the elimination of discrimination in respect of employment and occupation	Code of Conduct and Business Ethics Human Trafficking Policy Supplier Code of Conduct Diversity Policy Harassment Policy Employee Handbook Employee Terms and Conditions	Pages 11, 13, 15, 16 and 18
Environment Principle 7: Businesses should support a precautionary approach to environmental challenges; Principle 8: undertake initiatives to promote greater environmental responsibility; Principle 9: encourage the development and diffusion of environmentally friendly technologies	Code of Conduct and Business Ethics Human Trafficking Policy Supplier Code of Conduct Environmental Policy	Page 11, 13 and 22-24
Anti-Bribery and Corruption Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery	Code of Conduct and Business Ethics Supplier Code of Conduct Anti-Bribery and Corruption Policy	Page 11 and 13

UN Global Compact Agreement's Sustainable Suppliers Training Program (EMEA & APAC entities)

Sterling Lexicon EMEA & APAC has completed the UN Global Compact Agreement's Sustainable Suppliers Training Program, an international training project focused on engaging and educating suppliers on specific areas of the Ten Principles of the UN Global Compact, the Sustainable Development Goals (SDGs), and corporate sustainability.



SUSTAINABLE
SUPPLIERS
TRAINING PROGRAMME



SUSTAINABLE
SUPPLIERS
TRAINING PROGRAMME



This certificate is awarded to
Sterling Lexicon (Sterling Relocation)
for participating in the

SUSTAINABLE SUPPLIERS TRAINING PROGRAMME

July 2025



Global Compact
Network UK



Pacto Mundial
Red Española



Commitment to the Sustainable Development Goals (SDGs)

The Global Goals are a set of 17 integrated and interrelated goals to end poverty, protect the planet, and ensure that humanity enjoys peace and prosperity by 2030. Sterling Lexicon welcomes the SDGs and will play our part in helping governments and societies to achieve them.

Sterling Lexicon has considered all of the SDGs during the development of our ESG strategy and understand that the actions we take as part of our activities help contribute to their achievement.

Sterling Lexicon is prioritizing those SDGs where we can have the biggest impact through our business activities, while ensuring our priority SDGs cover all four UNGC principle areas.

Sterling Lexicon's priority SDGs are:



Please find within the contents of this Environment, Social and Governance Report how Sterling Lexicon is contributing to the achievement of the SDGs.

EcoVadis sustainability assessment (EMEA & APAC entities)

EcoVadis is an independent organization that provides holistic sustainability ratings covering **Environmental, Labour & Human Rights, Ethics and Sustainable Procurement impacts.**

EcoVadis continually assess our Environment, Social and Governance program and the progress of our business practices, through evidence-based assessments, tailored to industry sector, country and organization size.

EcoVadis provides us with transparent scorecards based on our policies, actions and results.

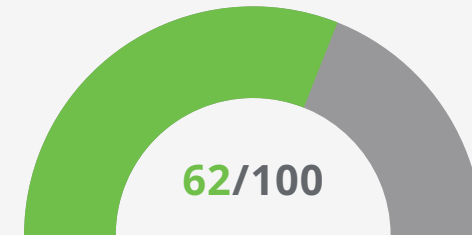
Sterling Lexicon utilizes these scorecards to benchmark our Environment, Social and Governance program to guide continuous improvement.

Sterling Lexicon has been awarded a Bronze rating, placing us in the top 35% of the 75,000 companies rated by EcoVadis, and is testament to every employee's commitment to making us a responsible business.

Assessment scores



Overall score



Environment



Labor and Human Rights



Ethics



Sustainable Procurement



Code of Conduct and Business Ethics

Sterling Lexicon's Code of Conduct and Business Ethics demonstrates our commitment to our values and corporate responsibility.

All Sterling Lexicon employees understand that when we live by our Code, we communicate more effectively, respect one another, comply with applicable laws and regulations and compete with integrity.

All employees are required to attest to our Code of Conduct and Business Ethics on an annual basis. Failure to attest, and failure to adhere to it's requirements may result in disciplinary action.

Sterling Lexicon utilizes Navex Global for our 24/7, confidential compliance telephone and web-based Ethics and Compliance Hotline. A reporting tool for employees, suppliers and clients to report a good faith concern regarding fraud, abuse, waste or other misconduct.

- ▶ Sterling Lexicon is committed to complying with all anti-bribery and corruption laws, regulations, and restrictions mandated by the Foreign Corrupt Practices Act, the UK Bribery Act, the Criminal Finance Act and other laws that govern corrupt practices, including bribery.
- ▶ Sterling Lexicon provides reasonable working conditions and fair wages and will not use child or forced labour. We don't tolerate or condone human trafficking or slavery and we expect the same from our suppliers.
- ▶ Sterling Lexicon is committed to fair competition and comply with all applicable antitrust and competition laws, regulations and policies, from all stakeholders.
- ▶ Sterling Lexicon is committed to competing fairly and with integrity. We never engage in activities with customers, suppliers or competitors that unfairly limit or prevent competition or give the appearance of doing so.
- ▶ Sterling Lexicon is committed to conducting business with reputable customers and suppliers and preventing the use of our assets and resources for illegal purposes, such as money laundering.

Commitment to data security and privacy

Sterling Lexicon ensures strict adherence to applicable global data protection laws, while keeping client and employee data secure, validated through globally recognized independent assessments.



- ▶ **Data Privacy Framework**
Sterling Lexicon complies with the EU-U.S. Data Privacy Framework (“EU-U.S. DPF”), the UK Extension to the EU-U.S. DPF, and the Swiss-U.S. Data Privacy Framework (“Swiss-U.S. DPF”) as set forth by the U.S. Department of Commerce. [Click here to view our certification.](#)
- ▶ **SOC 2 Type 2 (Americas)**
Independent auditing giving you faith in our internal controls.
- ▶ **CyberVadis (EMEA & APAC)**
Independent assessment and certification ensuring the integrity and confidentiality of our data.
- ▶ **ISO 27001 (EMEA & APAC)**
International standard of excellence, validating our commitment to risk mitigation and information security.



Carefully chosen, thoroughly vetted supply chain network

Sterling Lexicon's in-house Global Network Integration team is dedicated to supply chain selection and management.

Sterling Lexicon requires all members of our supply chain to comply with all applicable laws and regulations, hold the relevant accreditations where possible and agree to implement innovative management systems that align to ethical business processes.

Sterling Lexicon sources established experts in their respective fields from local contacts and organizations such as ERC, EuRA, FIDI FAIM and industry experts.

All members of our supply chain are vetted by our Global Network Integration team based on business processes that include:

- **Sterling Lexicon utilize Jaggaer, a third party procurement platform, which allows us to vet supplier's compliance processes, including anti-bribery and corruption, human trafficking, and modern slavery.**
- **Sterling Lexicon utilize Descartes Visual Compliance, a third party program built around the requirements of the FCPA, UK Bribery Act, OFAC and related laws and regulations.**
- **It is a mandatory requirement that all suppliers adhere to our Supplier Code of Conduct, confirming they will follow our ethical business requirements.**
- **It is a mandatory requirement that all suppliers sign our Data Protection Agreement, adhere to Sterling Lexicon's data protection and GDPR requirements.**



Diverse supply chain network

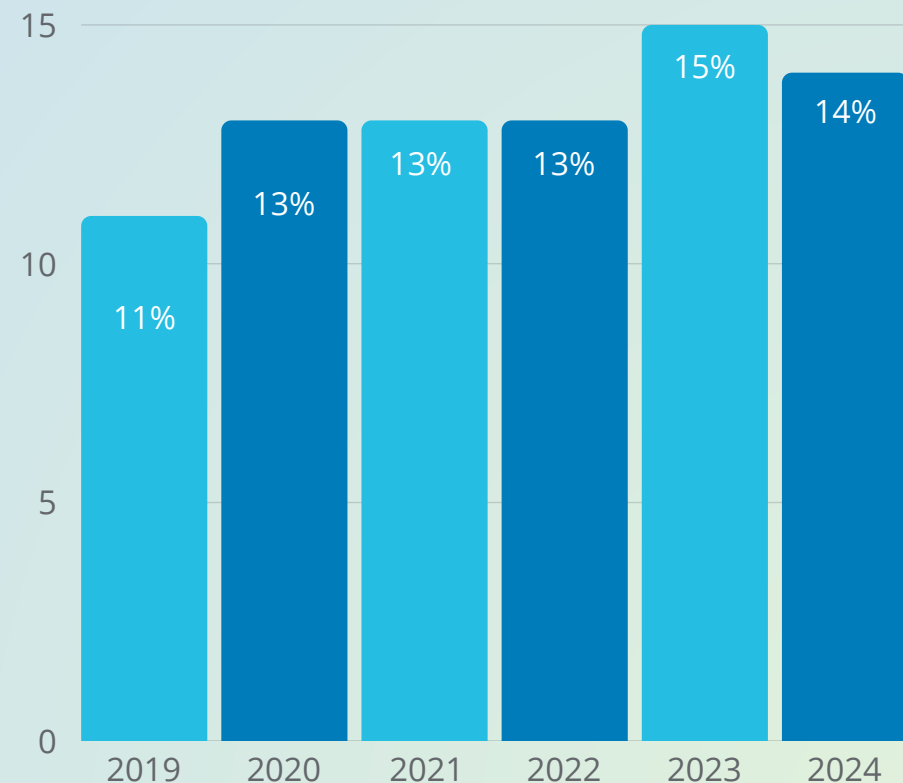
Sterling Lexicon is a member of the National Minority Supplier Development Council, we are committed to supplier diversity and the inclusion of MBEs in the procurement process.



Through our selection and due diligence processes, we encourage potential suppliers to describe their services as well as their MWOB designations. This enables us to consider expansions within our network or for targeted searches for any client-based initiatives. We also encourage and provide documents for small suppliers to complete the self-registration process with the Small Business Administration (U.S. only). This allows suppliers who meet the criteria to be categorized as such without the common expense associated with designation. Sterling Lexicon can provide diverse supplier subcontracting spend reports on a quarterly basis.



Average diversity spend by % is between 13% and 15% since 2020





Our People

Our team is motivated by knowing that our work has purpose, and seeing the meaningful difference we can help make in people's lives.

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Diversity, Equity & Inclusion

Sterling Lexicon understands that diverse and inclusive teams are best positioned to mobilize opportunity and contribute to innovative, industry-leading ideas.

We recognize the value of recruiting, hiring and promoting job applicants and employees with different backgrounds, experiences, perspectives and beliefs.



Affirmative Action and Equal Opportunity Employer

We treat every candidate with fairness and equity, regardless of ethnicity, gender, age, religion, disability, national origin, marital status, sexual orientation, veteran status, or other protected characteristics.

Compensation

Our compensation practices are guided by transparency and equity. We evaluate salaries and performance based on job responsibilities, required skills, and competencies, aligning them with industry standards. Regular reviews ensure compliance with applicable laws and fairness for all employees.

Professional development

At Sterling Lexicon, employee growth is a priority. We support career advancement through diverse learning opportunities, ensuring employees can enhance their skills and broaden both personal and professional horizons. From training programs to unique leadership pathways, we help you build your future.

Diversity, Equity & Inclusion (DE&I) in the workplace

We actively foster a workplace built on DE&I and respect. Employees have access to training courses promoting understanding and collaboration while focusing on eliminating discrimination and harassment. Together, we strive to build an environment where everyone feels valued and empowered.



Training and development

All Sterling Lexicon employees are given the necessary support to:

- ▶ Develop the knowledge, skills and attitude they require to carry out their jobs effectively
- ▶ To prepare them for changes that affect their roles and tasks
- ▶ To equip them to meet the challenges and demanding objectives which are articulated in our business plan
- ▶ Release creativity and enable them to realise their potential

Mandatory compliance training

It is a mandatory requirement that all Sterling Lexicon employees take induction and annual refresher training, or as and when legislative or business changes require. Training includes Anti-bribery and Corruption, Code of Conduct and Business Ethics, Cyber Security, Diversity, Equity and Inclusion, and Human Trafficking. All training sessions are available to employees through our HRI system, Workday, and are managed and updated by NAVEX, an industry leader in risk, ethics and compliance software and services.

Development opportunities

Sterling Lexicon employees benefit from our company development program, Suddath Way of Leading. Employees have access to a range of topics to support their development journey, including Time Management, Customer Service, and Open Communication.

To develop industry knowledge all employees are provided with both formal and informal training on industry-specific topics, such as attendance at industry events and attainment of industry-specific designations such as GMS and CRP.



Wellbeing

Sterling Lexicon knows we are responsible for ensuring, so far as reasonably practicable, the health, safety, and welfare of all our employees. We also have a duty to take reasonable care of anyone who could be affected by our work.

Wellbeing initiatives implemented by Sterling Lexicon for our employees include:

- Mandatory induction and refresher training for all employees covering Health & Safety, Workplace Violence and Bullying, and Discrimination and Harassment.
- Employee Assistance Program giving employees access to confidential advice on matters including legal rights, financial concerns, personal relationships, family care, etc.
- Wellbeing Hub within our company intranet, hosting information and resources focused on physical, emotional and financial wellbeing.
- Employee Champions focused on Wellbeing are in place to support and communicate business initiatives as advocates of this focus area.

Solutions offered to support our clients and their assignees include:

- Applying the right approach to our service delivery; retaining the human touch to ensure alignment with individual assignee requirements enhanced by user-friendly technology.
- Tailored services to meet individual needs, including advice on the best use of allowances.
- Adapting services to meet local requirements.
- Online Destination Information and Post Assignment Support to aid settling-in.



Employee engagement and recognition

Sterling Lexicon believes the best way to motivate our employees to deliver the highest standards of service is by giving them an exemplary employee experience. Sterling Lexicon keeps our employees motivated and happy by:

- ▶ Fostering a culture that is diverse, inclusive and friendly
- ▶ Providing competitive benefits that take care of our employees and their family
- ▶ Investing in and training our employees so they are the best at what they do
- ▶ Encouraging our teams to work for constant innovation and improvement

Employee engagement survey

Sterling Lexicon conducts periodic employee engagement surveys as a way of enabling the organization to identify positive and negative aspects of work experienced by employees and factors that may have an influence on engagement levels.

Our employee engagement surveys managed through McLean & Company provide an insight into a wide range of business issues and generates discussions about how we can create a better place to work for our employees. The surveys produce useful and actionable results, and the questions are tailored to our organization.

Employee recognition scheme

Sterling Lexicon utilizes an employee experience and recognition platform which allows leaders and peers to recognize and reward achievements.

- ▶ Annual Value awards recognizing those employees who demonstrate a commitment to our core values.
- ▶ Employee Champions focused on both Employee Engagement and Employee Recognition are in place to support and communicate business initiatives as advocates of this focus area.
- ▶ Employee recognition in internal newsletter showcasing service feedback.
- ▶ Company-wide employment anniversaries celebrated.
- ▶ Employee Appreciation Week celebrated globally.



Our Planet

Committed to implementing sustainable practices and using systems designed to minimize the impact of our operations on the environment.

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Accredited environmental management system (EMEA & APAC entities)

Sterling Lexicon aims to foster among our staff, suppliers, customers, shareholders and communities local its operations an understanding of environmental issues in the context of its business. Our collective task is to ensure that we continually improve the environmental impact of all our activities.

Sterling Lexicon is committed to setting environmental targets and continually measuring our performance and achieving continuous improvement in minimising the impact that our activities have upon the local and global environment.

Sterling Lexicon will ensure that every aspect of our activities is conducted in accordance with sound environmental practices, we will achieve this by:

- **Minimizing the consumption of natural resources and energy, whilst consuming material goods in moderation.**
- **Reducing the creation of waste by the adoption of improved operating practices and by recycling of materials whenever practical.**
- **Ensuring all waste and effluent is disposed of in a safe and responsible manner.**
- **Investing in the development of new products and processes that have an improved performance regarding their impact on the environment.**
- **Complying with environmental legislation.**

The ISO 14001 Environmental Management System (EMS) accreditation confirms Sterling Lexicon is managing the aspects of our business which have a significant impact on the environment.



Sterling Lexicon EMEA & APAC's ISO14001 Environmental Management System is one of the key tools we use to help guide, manage and ensure our continual improvement.

Sterling Lexicon has maintained our ISO 14001 accreditation since 2010.

Environmental initiatives

Sterling Lexicon is committed to reducing our environmental impact by:

- ▶ Implementing sustainable business practices
- ▶ Finding environmentally-friendly solutions to service delivery
- ▶ Instilling a culture of environmental awareness across our workforce and supply chain network

Implementing sustainable business practices

- Paperless processes, including e-billing, DocuSign and Microsoft OneNote.
- Utilizing communication platforms to reduce business travel and limit business travel to critical only.
- Waste recycling schemes implemented across our offices
- IT equipment is reused and refurbished where possible, reducing waste. Should an item be beyond refurbishment it is disposed of in accordance with the EU Directive on Waste Electronic and Electrical Equipment regulations.
- Only utilize rechargeable batteries for hardware. Where this is not possible batteries are recycled at recycling points in all of our offices.
- Environmentally conscious approach to Marketing materials and events, including reusable giveaways, downloadable documentation and electronic business cards.

A culture of environmental awareness across our workforce

- Hybrid Working Policy reducing employee travel GHG emissions by 40%.
- Employee Champions focused on Environment and Community to support business initiatives as advocates of this focus area.
- Mandatory training in environmentally friendly practices.
- All employees must take mandatory induction and refresher training covering our Code of Conduct and Business Ethics, which includes our Environmental Policy.
- Provision of a confidential Compliance Helpline allowing members of our supply chain and employees to report a good faith concern regarding environmental activities.

Environmentally-friendly solutions to service delivery

Global mobility teams are being challenged to reduce the environmental impact of their programs. Sterling Lexicon is working with our clients to identify sustainable solutions while maintaining quality, cost effectiveness and assignee experience. Solutions we have implemented for existing clients include:

- **Virtual Services, including Pre-move Surveys, Area Orientation and Home Search services, reducing travel emissions.**
- **School Search assistance is often delivered alongside the home finding/home search service, reducing travel emissions.**
- **Where possible, Sterling Lexicon sources temporary accommodation providers with eco-friendly property solutions, such as, energy efficiencies, recycling systems and circular economies.**
- **Finding alternative solutions to shipping household goods, for example, reviews of volume allowance, removal of air freight, and usage of excess baggage, storage and furniture rental.**
- **Discard & Donate program resulting in reduced packing materials and less fuel used for transportation of the shipment. Our partner, Home Sweet Home, provides customized metrics that translate the savings above into trees saved and CO2e impact.**
- **Sustainable utilization of household goods materials including reuse of wooden crates, and card-based packing materials. Any materials not suitable for reuse are recycled.**
- **Sustainable policy and process options are a key consideration throughout the consulting and development process.**
- **Reducing waste through electronic invoicing and expense submitting (no requirement for printed receipts and invoices).**



Worldwide ERC's Global Mobility Sustainability Coalition

Peter Sewell, Sterling Lexicon's Managing Director EMEA & APAC is a member of the Worldwide ERC's Global Mobility Sustainability Coalition.

Peter joined representatives from Worldwide ERC®, FIDI Global Alliance, International Association of Movers, Canadian Employee Relocation Council, European Relocation Association and Corporate Housing Providers Association came together for the first time in November 2022 in an all day lab to align on a roadmap to support the broader mobility industry in developing sustainable solution.



Our communities

Caring for the communities we operate in today while building a better tomorrow – for our teams, our customers and our local and global neighbors.

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Volunteering Policy

Sterling Lexicon's Volunteering Policy gives every employee one day of paid time off to undertake volunteering work at a community or charity initiative of their choice.

We encourage all our employees around the world to take part in volunteering – whether it's lending a hand in local communities, supporting our charity partners or taking part in fundraising activities.



Sterling Lexicon Singapore team came together at Willing Hearts, a volunteer-run soup kitchen that prepares and distributes approximately 10,000 meals daily to those in need in Singapore.



Sterling Lexicon UK office has an established community partnership with Hillingdon Foodbank/The Trussell Trust. Hillingdon Foodbank provides short-term and emergency food to families going through difficult times.



Charitable initiatives

Sterling Lexicon utilized our stand at the Expat Academy Ltd conference to promote and support the great work of the Make-A-Wish Foundation. We challenged our guests to spin the Wheel of Giving and help us provide much needed fundraising. This resulted in a donation of £1,000 to the charity.



Sterling Lexicon's teams across the world participated in Move For Hunger's Move2 Fight Hunger Challenge 2025. Move For Hunger is a hunger relief non-profit organization that mobilizes transportation networks to deliver surplus food to communities in need.

The step challenge saw our team cover 2,784.34 miles, raising \$2,610.86 and providing 10,443 meals to communities in need.





Our Goals

Driving positive change
through responsible
practices

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A key step in meeting our environmental, social and governance responsibilities is to commit to continuous improvement across all of our focus areas, and align our ESG objectives with our business objectives.

- ▶ Commence the measurement of our Scope 1 and 2 emissions and set a clear Path to Net Zero.
- ▶ Tracking progress of our ESG goals and commitments through Key Performance Indicators (KPIs).
- ▶ Sterling Lexicon U.S. based offices to submit their first EcoVadis assessment and join the UN Global Compact Agreement, alongside our EMEA & APAC entities.
- ▶ Continue our commitment to all 17 of the United Nations Sustainable Development Goals (SDGs), focusing on those of highest priority
- ▶ Lead change in global mobility by introducing innovative, sustainable practices at every opportunity.
- ▶ Implement solutions that reduce environmental impact while fostering growth.
- ▶ Maintain our ISO 14001 accreditation in EMEA & APAC.





Your People. Our Passion

www.sterlinglexicon.com