

As part of our ESG materiality assessment, we conducted a company-wide human rights impact assessment (HRIA) of our global operations, products, and services. In doing so, we sought to proactively manage actual and potential human rights impacts in order to mitigate risks to both Thomson Reuters and to rightsholders.

We partnered with a specialized strategy consultancy with expertise in human rights and responsible innovation, to carry out the human rights impact assessment. We also engaged outside legal counsel to assist us with part of our human rights impact assessment work.

As part of this effort, Thomson Reuters committed to align with the United Nations Guiding Principles on Business and Human Rights (UNGPs), which augments our longstanding commitment to the UN Global Compact, the UN Declaration on Human Rights, and other international standards.

Once the company's universe of salient human rights risks and opportunities was determined (BT EF ¼ OFE CZ UIF * OUF SOBU J F OBM # JMM P G YNBO), our consultancy assessed the degree to which actual and potential impacts were being managed by the company's existing policies and processes. This included a review of relevant internal processes, as well as interviews with policy owners and program managers across our FOUFSQSJT F 5IF ¼ OEJOHT XFS F UIF O NBQQFE BHB JOTU the expectations of the UNGPs, which inform our human rights strategy and roadmap.

5IF ¼ OEJOHT PG PVS BTTFTTNFOU Thomson Reuters has a strong, ethics-based, risk management approach and a clear culture of responsibility, integrity, and focus on implementing effective risk mitigation measures. Further, Thomson Reuters has an extensive and robust management framework that includes:

- Code of Business Conduct & Ethics, which includes provisions on equal opportunities and ensuring a respectful workplace
- Supply Chain Ethical Code to manage supply chain risks
- Enterprise Risk Management Framework, to identify, assess, and manage risks across all domains
- Privacy Program guided by a privacy management framework and the Thomson Reuters Privacy Statement
- Information Security policies and a cyber compliance program
- Embedded Ethics and Governance in Thomson Reuters data and AI lifecycles through people, processes, and technologies
- Customer credentialing and compliance oversight for our public records business (CLEAR) and training for teams interfacing with the customers and data

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At the same time, the assessment also found potential risks to human rights across Thomson Reuters value chain. These risks were categorized by rightsholder groups and included (in no particular order):

| UDHR | Article | Description |
|-----------------------------|---------|--|
| Freedom from Discrimination | 2 | Through products and services that seek to reduce bias in algorithmic decision-making partnerships with organizations such as the Law Firm Anti-Racism Alliance (LFAA) and the National Organization of Black Law Enforcement (NOBLE). |
| Freedom from Slavery | 4 | tCd [(Thrope [(and)8 (e)-28 (eEuTd [(Thrpsm)0 -1OSC(cemen)2 2.1 (tion o-28a dign)22 TD d law)(t)a 1 Tf nf)-10 (y (o TD dmpaig28aim9 (ek t [rimi w p)3 (eri [(Mi)8 (ecruc ands(o TD d)]rshiei [(t)3..1 (tion oi* [(L)-2 md |
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#BTFE PO UIF ¾OEJOHT PG UIF vye stfive 50 u n e T r O Commercial and societal responsibilities: to Increase Knowledge, to Act with Courage and Integrity, and to Pursue Justice, Truth, and Transparency, all the while guided by our Trust Principles, including that of integrity, independence, and freedom from bias.

Moreover, the recommendations from this comprehensive ESG assessment will continue to help us identify, assess, and proactively respond to salient and material risks across our enterprise.