



# E S G

## ENVIRONMENTAL, SOCIAL, AND GOVERNANCE POLICY

EmpiRx Health believes that Environmental, Social, and Governance (ESG) principles are crucial to developing a healthcare services company that is not only resilient but also looks, talks, and thinks like its clients and patients, i.e. our workforce diversity resembles the clients and patients we serve. We are committed to integrating ESG into every aspect of our operating discipline. This ESG policy outlines our organizational approach to integrating ESG into our business operations.



## ESG AT EMPIRX HEALTH

EmpiRx Health is committed to integrating ESG factors throughout its business operations as we focus on matters that are meaningful to our employees and customers. As a healthcare services company, the Environmental aspect of ESG is relatively muted in comparison to the Social and Governance factors. From a Social and Governance standpoint, we seek to ensure that solid ESG thinking is baked into every aspect of our makeup and how we operate internally and externally.

### Social and Workplace Priorities

- Recruiting, compensating, developing, and retaining women in the workforce in a differentiated and highly-deliberate manner, with a focus on creating a highly equitable workforce with 100% pay parity (measured annually).
- Recruiting diverse talent into the organization across people of color, LGBTQ+, and age, to ensure the company is not only a melting pot of diverse upbringings and perspectives, but is also reflective of our client and patient base.
- Promoting not just workforce diversity but also experiential diversity in the workplace by being vocal and sharing our unique experiences around mental health and racial/cultural sensitivities. The goal is to create an inclusive workplace where experiential diversity is normalized and comfortable.
- Continuing to drive a market-differentiated population health management solution that is condition-neutral and sensitive to population risk factors that includes social determinants of health and health equity.
- Building on our complex care management chassis to deliver greater sophistication within our member care advocacy model while allowing our patients with greater healthcare and service needs (opioid abuse disorder, depression, polypharmacy, etc.) to get the personalized care that they deserve.
- Partnering with locally-based colleges and universities with a sizeable POC population, to foster greater collaboration, build a recruitment pipeline, and become active DE&I champions in our communities.
- Promoting supplier diversity within our vendor pipeline, with a focus on providing opportunities to minority and women-owned businesses (MWBs), and organizations with a positive social impact.

- Investing money and time into furthering the use of technology to improve health equity in our country.

### Good Governance

We believe that good corporate governance is essential for financially sound and resilient companies. For EmpiRx Health, this includes:

- Ensuring the presence of well-established and documented controls to ensure the highest level of integrity in terms of how we manage our financials.
- Hiring a highly-reputed audit and tax firm to ensure the highest-degree of rigor and discipline to both these key aspects of financial governance.
- Instituting an experienced, active, and engaged board of directors to properly oversee and direct management, and encourage protocols to enhance transparency and good governance.
- Deploying a dedicated team under the guidance of a senior leader to monitor and manage compliance and regulatory requirements. The expectation here is much broader than HIPAA and includes all state and federal regulatory requirements.
- Purchasing a rigorous cyber security insurance policy to ensure that nothing is lacking in terms of the company's response in the event of a cyber incident.

### Environmental

While opportunities for environmental gains are limited in our business, there are clear opportunities that we choose to embrace.

- The continued and managed growth of our remote workforce allows for a reduction in commute driven air pollution.
- We will continue to maintain a work-from-home policy for Fridays with the goal of reducing commute-related environmental factors.
- Piggybacking off our hybrid-remote workforce strategy to double-down on efforts to reduce paper waste, through leveraging collaboration tools and increased electronic screen sharing. Sustainability efforts also include our office printing policies (e.g., duplex printing) and an emphasis on going green wherever possible (e.g., e-faxing, e-billing, e-signing).
- Air travel has been limited due to health concerns, but will continue to be managed very tightly to ensure we are doing our bit for the environment in addition to the health of our employees.



## ESG MONITORING

EmpiRx Health will leverage a multi-pronged monitoring protocol to ensure that we are adhering to the core expectations and values of the ESG policy. The monitoring tools include:

- Monthly calculation and analysis of our workforce diversity measures with a clear gameplan to address any areas where we may be falling short. Internally, the workforce makeup will also be shared with the senior leadership team via the monthly balanced scorecard, as well as with all employees on a quarterly basis.
- Our DE&I metrics will be shared on our website and in capabilities presentations to potential clients and partners, as a marker of our differentiated makeup and native focus on ESG.
- Formal allocation of ESG investment dollars in our budget process towards community-based programs and research into tech-driven equity improvements.
- Participation in an annual third-party ESG assessment to ensure we understand how we're faring against industry benchmarks and our areas for improvement.
- Delivery of a quarterly compliance dashboard to the senior leadership team that clearly articulates where we stand from a compliance readiness standpoint, including gaps, and gap closure plans as needed.

## ROLES AND RESPONSIBILITIES

EmpiRx Health's CEO and President have ultimate responsibility for overseeing the ESG policy. Most ESG initiatives are led under the purview of the Chief People Officer, with the Chief Marketing and Experience Officer leading the charge on the tech-based equity initiative. The SVP of Strategic Operations is responsible for the overall compliance posture and regulatory readiness of the organization. The compliance team also monitors changes or updates to industry trends, policy, and regulations, and provides specialized expertise to the internal teams. They also provide external guidance as required. The Chief Financial Officer owns the relationship with the audit and tax firm and is responsible for all aspects of a well-controlled financial operation.

## ONGOING REVIEW

This ESG policy is reviewed annually to reflect changes to the business. It was last updated in November 2022 and is subject to change as the company considers necessary or advisable.

