



Alignment to SASB

We have aligned the Lowell Group Sustainability Scorecard with the Sustainability Accounting Standards Board (SASB) Professional and Commercial Services sector guide.

[View our full KPI scorecard](#) → **p34**

SASB Topic	SASB Code	Metric	Lowell Disclosure	Lowell Measure	Footnotes
Data Security	SV-PS-230a.1	Description of approach to identifying and addressing data security risks	Responsible Business	→ Group Risk Framework supported by local policies relative to data security, protection and privacy	Our Group Risk Framework and Information Security Policy outline our approach to identifying and addressing data security risks and vulnerabilities.
				→ % of colleagues completed training relating to data security, protection and privacy during 2021	Lowell provides a range of training programmes across our regions on the identification and management of data security risks.
	SV-PS-230a.2	Description of policies and practices relating to collection, usage, and retention of customer information	Responsible Business	→ Detailed policies and colleague training ensures we collect, treat and store customer data according with relevant regulatory requirements, legislation and standards.	Our approach to collecting using and storing customer data is covered across a range of policies that align to the relevant regulatory requirements, legislation and standards within the regions where we operate, such as data protection law, to set out our overarching approach. These include: Data Governance, Information Risk, Information Security, Information Classification and Handling Guidelines.
	SV-PS-230a.3	(1) Number of data breaches, (2) percentage involving customers' confidential business information (CBI) or personally identifiable information (PII), (3) number of customers affected	Responsible Business	→ Number of substantiated complaints received concerning breaches of customer privacy and losses of customer data	We are open and transparent with our regulators and co-operate with them whenever we are contacted about complaints raised with them by customers in relation to privacy or data protection matters. In 2021, this engagement resulted in 16 complaints being upheld in the customer's favour (by the UK Information Commissioner's Office, and the Austrian Datenschutzbehörde). Just under half of the complaints, 7, related to issues with responses to Subject Access Requests, other matters included customer communications being sent to incorrect contact details and incorrect information being reported on customer credit files. Additional information relating to SASB: <ul style="list-style-type: none"> Each complaint related to personally identifiable information impacting one individual customer. 2 of the 16 complaints related to personal data breaches (neither of these were reportable to the regulator)
Workforce Diversity & Engagement	SV-PS-330a.1	Percentage of gender and racial/ethnic group representation for (1) executive management and (2) all other employees	Better for Society	→ Gender diversity	We do not currently collect data on ethnic diversity in our workforce. This is due to regulatory restrictions in some of our markets. In 2022/23, we will be improving our data on ethnic diversity in the UK.
	SV-PS-330a.2	(1) Voluntary and (2) involuntary turnover rate for employees	Better for Society	→ Employee turnover	We monitor and report both voluntary and involuntary turnover for our employees.
	SV-PS-330a.3	Employee engagement as a percentage	Better Ethics and Understanding	→ Group colleague engagement score (overall)	We run an online Group colleague engagement survey twice a year via a third-party provider. Our overall Group colleague engagement score is based on the average score from the question 'How happy are you working at Lowell?' and 'I would recommend Lowell as a great place to work'. Our survey uses an average score metric. 64% of colleagues respond favourably on the topic of engagement.
Better for Society			→ Group colleague engagement 'happy' scores	Our Group colleague engagement survey asks 'How happy are you working at Lowell?'.	
Better for Society			→ Group colleague engagement 'opportunities to learn' scores	Our Group colleague engagement survey asks colleagues to comment on whether 'I have good opportunities to learn and grow'.	
Professional Integrity	SV-PS-510a.1	Description of approach to ensuring professional integrity	Better Ethics and Understanding	→ Clear Values and ways of working	Our approach to ensuring professional integrity includes the implementation of our externally published Code of Conduct and People Policy. Accountability sits with our Regional Executive Committees. Colleague performance is measured through our 'Let's Talk' Performance Evaluation process.
			Responsible Business	→ % of colleagues completed training relating to anti-bribery and corruption	Anti-bribery and corruption training is an important aspect of how we ensure professional integrity.
SASB Activity Metric	SV-PS-000.A	Number of employees by: (1) full-time and part-time, (2) temporary, and (3) contract	Better for Society	→ Number of employees	Number of colleagues employed by Lowell as at 31 December 2021.