

PensionBee Group PLC 2022 SASB Disclosure

Primary SICS Sector: Financials
 Primary SICS Industry: Asset Management & Custody Activities

Topic	Accounting Metric (table 1) / Activity Metric (table 2)	Category	Unit of Measure	Code	Answer
Table 1. Sustainability Disclosure Topics & Accounting Metrics					
Transparent Information & Fair Advice for Customers	(1) Number and (2) percentage of covered employees with a record of investment-related investigations, consumer-initiated complaints, private civil litigations, or other regulatory proceedings	Quantitative	Number, Percentage (%)	FN-AC-270a.1	0 / 0%. We have no investment-related investigations, consumer-initiated complaints, private civil litigations or other regulatory proceedings made against any employee.
	Total amount of monetary losses as a result of legal proceedings associated with marketing and communication of financial product-related information to new and returning customers	Quantitative	Reporting currency	FN-AC-270a.2	£0
	Description of approach to informing customers about products and services	Discussion and Analysis	n/a	FN-AC-270a.3	<p>PensionBee's mission is to make pensions simple, so that everyone can look forward to a happy retirement. PensionBee customer communications demystify technical jargon, to make pensions accessible, engaging and relevant for everyone.</p> <p>PensionBee's website and all its communications are written in plain English and a friendly, personable tone, subject to specific regulatory requirements. PensionBee has been awarded the Plain English Campaign's Crystal Mark and App Mark of approval, the only internationally recognised mark that approve the clarity and accessibility of a website and mobile app, respectively.</p> <p>PensionBee offers both tools and educational content to assist its customers with their wider financial well-being:</p> <ul style="list-style-type: none"> - Pension calculator, integrated within the product and publicly available, to assist customers in planning their retirement income; - Drawdown calculator, integrated within the product and publicly available, to assist customers in planning their withdrawals; - Retirement planner, integrated within the product and linked to live pension accounts, to assist customers in understanding their projected retirement income based on their balance, age, and contributions. Customers can use sliders to set retirement age, desired income, and contribution amounts to see how long their projected income will last once they retire; - Blog, with easy-to-read financial content on a range of topics that most interest our customers; - Podcast, a educational series featuring experts and special guests discussing personal finance concepts, pensions and retirement; - Pensions Explained Centre, with easy-to-understand explanations of technical pensions concepts; - Pension Academy video series, led by a YouTube vlogger to deliver important information about how pensions work in bitesize videos; - YouTube video series; Pensions 101 a video series designed to help us all make better sense of pensions; - UK Pension Landscape, a page designed to provide customers with information on how UK pension pots differ, depending on region, age and gender. <p>Each customer who joins PensionBee receives their own named BeeKeeper. BeeKeepers provide</p>
Employee Diversity & Inclusion	Percentage of gender and racial/ethnic group representation for (1) executive management, (2) non-executive management, (3) professionals, and (4) all other employees	Quantitative	Percentage	FN-AC-330a.1	<p>(1) <u>Executive Management</u></p> <p><i>Gender</i></p> <ul style="list-style-type: none"> - Female & minority genders: 57% - Male: 43% <p><i>Racial/ethnic group</i></p> <ul style="list-style-type: none"> - Asian or Asian British: 7% - Black, African, Caribbean or Black British: 14% - White: 79% <p>(2) <u>Non-executive management</u></p> <p><i>Gender</i></p> <ul style="list-style-type: none"> - Female & minority genders: 34% - Male: 63% - No response/rather not say: 3% <p><i>Racial/ethnic group</i></p> <ul style="list-style-type: none"> - Asian or Asian British: 14% - Black, African, Caribbean or Black British: 9% - Mixed or Multiple Ethnic Groups: 3% - White: 63% - Latin(a/o/x) & Other: 9% - No response or rather not say: 3% <p>(4) <u>All other employees</u></p> <p><i>Gender</i></p> <ul style="list-style-type: none"> - Female & minority genders: 55% - Male: 41% - No response/rather not say: 4% <p><i>Racial/ethnic group</i></p> <ul style="list-style-type: none"> - Asian or Asian British: 16% - Black, African, Caribbean or Black British: 12% - Mixed or Multiple Ethnic Groups: 8% - White: 54% - Latin(a/o/x) & Other: 7% - No response or rather not say: 3%
	Amount of assets under management, by asset class, that employ (1) integration of environmental, social, and governance (ESG) issues, (2) sustainability themed investing, and (3) screening	Quantitative	Reporting currency	FN-AC-410a.1	<p>PensionBee does not undertake investment management activities, preferring to partner with world-class institutions who are capable of delivering the best possible solutions for its customer base. PensionBee's existing funds are provided by BlackRock, State Street, Legal & General Investment Management and HSBC.</p> <p>Amount of assets under management that employ:</p> <ul style="list-style-type: none"> (1) integration of ESG issues: 93% of total AUA (2) sustainability-themed investing: 12% of total AUA (3) screening: 93% of total AUA <p>PensionBee seeks screens where both the asset class and the plan investment objectives allow it.</p>

Incorporation of Environmental, Social, and Governance Factors in Investment Management & Advisory	Description of approach to incorporation of environmental, social, and governance (ESG) factors in investment and/or wealth management processes and strategies	Discussion and Analysis	n/a	FN-AC-410a.2	<p>As a result of index-based investing, our customers are the owners of thousands of companies around the world. At PensionBee we believe in the engagement with consequences approach. This means we want to work with all companies to help them become better corporate citizens and create an investment system that rewards a positive impact on the planet and society.</p> <p>However, there will always be some companies that it is not possible to engage with. This is a result of their business activities, such as the manufacture of weapons expressly intended to harm civilians, or because they continually break international norms in line with the United Nations Global Compact (UNGC).</p> <p>We seek to apply baseline ESG exclusionary screens where both the asset class and the plan investment objectives allow it. This means firstly that screens can be applied to equities and fixed income but cannot yet as easily be applied to gilts, government bonds, cash or alternative investments such as commodities or REITs. Secondly, this means that another objective, such as values-based investing, or a target return, will take precedence over any screens. We have worked with our asset managers to introduce ESG screening for violators of the UNGC and controversial weapons companies.</p> <p>The equity and fixed income portions of four plans are fully screened for violators of the UNGC and manufacturers of controversial weapons. These are: the Tailored Plan, Tracker Plan, Fossil Fuel Free Plan and Pre-Annuity Plan and they represent over 93% of the asset base. In addition to the baseline screens, we are reducing our overall exposure to tobacco and thermal coal over time. Over 99% of the Tailored Plan, our largest plan by customers and assets, also passes BlackRock baseline screens for tobacco, thermal coal, civilian firearms and nuclear weapons. Our asset managers use FTSE and MSCI definitions for their exclusions.</p> <p>In 2022 we launched our Fossil Fuel Free Plan, which was created and introduced in direct response to customer demand. It screens out companies with proven or probable fossil fuel reserves and companies that provide services to the fossil fuel industry along with tobacco companies, controversial weapons companies and UNGC violators. The index tracks tilt toward Paris-aligned companies using a Transition Pathway Initiative methodology.</p> <p>In 2022 we worked on the development of our newest sustainable option, the PensionBee Impact Plan, our first impact investing product. Our Impact Plan launches in 2023 and will only invest in companies where there is materiality (a majority of that company's business is focused on solving a world problem), additionality (the company is key to solving this problem and without the company the problem would be worse), and measurability (the impact the company makes is measurable). We introduced this plan to cater for our customers who told us they want their pension to build a better world, whilst saving for retirement.</p>
	Description of proxy voting and investee engagement policies and procedures	Discussion and Analysis	n/a	FN-AC-410a.3	<p>Pensions have the collective power and potential to change the world for the better. Trillions of pounds are invested in companies that can improve or harm the planet and society through their business models. At PensionBee we believe that companies that focus on their contribution to society and the planet have a better long-term chance of being financially sustainable and bring stronger returns for our members.</p> <p>Whilst exclusions work for some types of companies, we believe in the engagement and active ownership approach. We believe our role at PensionBee is to be a responsible and vigilant asset owner, to help challenge bad corporate behaviour and seek to take our money away from companies that will not engage or propose timelines for appropriate change. As we invest via pooled funds, our approach to active ownership has always focused on regular engagement with the investment stewardship teams of our managers to articulate our views and expectations. We do this with the purpose of driving up levels of transparency and accountability around their direct engagement activities, applying scrutiny to their voting record and demonstrating our commitment to active ownership. We also seek to drive good corporate behaviour, so where their voting record is not consistent with the interests of our customers or with long-term returns, we seek a full and satisfactory rationale.</p> <p>PensionBee first requested voting rights from asset managers in 2019, but were informed that it was not possible owing to a range of technological, legal and administrative obstacles. However, in 2022 after many years of work in this area, BlackRock and State Street Global Advisors have now granted us proxy "voting choice" from the 2023 proxy voting season onwards. This will cover three PensionBee plans: Tailored, Tracker and 4Plus - which together represent 86% of the asset base. PensionBee will use ISS's Socially Responsible Investment (SRI) voting policy from 2023 onwards. We selected this voting policy as it best aligns with our customers interests and expectations, which we collect annually via a survey on their investment views.</p> <p>For our remaining plans, our managers will continue to use direct engagement before votes to advance material sustainability insights to enhance long-term risk-adjusted returns and then block vote across all the assets.</p>
Business Ethics	Total amount of monetary losses as a result of legal proceedings associated with fraud, insider trading, anti-trust, anti-competitive behavior, market manipulation, malpractice, or other related financial industry laws or regulations	Quantitative	Reporting currency	FN-AC-510a.1	£0
	Description of whistleblower policies and procedures	Discussion and Analysis	n/a	FN-AC-510a.2	<p>PensionBee is committed to creating an environment that promotes open communication and gives every employee the ability to raise any problem they, or another employee, may have relating to work and the working environment.</p> <p>Our Whistleblowing Policy has the aim of ensuring PensionBee has a fit-for-purpose whistleblowing procedure that encourages employees to come forward with disclosures without fear of reprisal and that ensures a whistleblowing case is effectively dealt with. Employees are informed of the whistleblowing policy as part of onboarding and once annually during our compulsory Compliance test.</p> <p>All employees are encouraged to make qualifying disclosure to our nominated whistleblowing champion, who is also our Independent Non-Executive Director. Reports can be made anonymously or one can use their own name, either by email or in the post.</p>
Table 2. Activity Metric					
	(1) Total registered and (2) total unregistered assets under management (AUM)	Quantitative	Reporting currency	FN-AC-000.A	<p>PensionBee does not manage any money subject to the regulations of the Investment Company Act 1940 (1940 Act). PensionBee provides pension products managed by BlackRock, State Street Global Advisors, Legal & General Investment Management and HSBC.</p> <p>As of Q4 2022 PensionBee assets under administration were £3bn.</p>
	Total assets under custody and supervision	Quantitative	Reporting currency	FN-AC-000.B	£0. We do not perform regulated custody or supervision activities.
Secondary SICS Sector: Technology & Communications Secondary SICS Industry: Software & IT Services					
Topic	Accounting Metric (table 1) / Activity Metric (table 2)	Category	Unit of Measure	Code	Answer
Table 1. Sustainability Disclosure Topics & Accounting Metrics					
Environmental Footprint of Hardware Infrastructure	(1) Total energy consumed, (2) percentage grid electricity, (3) percentage renewable	Quantitative	Gigajoules (GJ), Percentage (%)	TC-SI-130a.1	<p>Energy consumption in FY 2022</p> <p>1) Total energy consumed: 62,407 (kWh) 2) Percentage grid electricity: 0% 3) Percentage renewable: 100%</p>
	(1) Total water withdrawn, (2) total water consumed, percentage of each in regions with High or Extremely High Baseline Water Stress	Quantitative	Thousand cubic meters (m3), Percentage (%)	TC-SI-130a.2	N/A
	Discussion of the integration of environmental considerations into strategic planning for data center needs	Discussion and Analysis	n/a	TC-SI-130a.3	<p>In order to minimise our environmental impact we only use cloud-hosted web services which remove the need for servers. Our website is powered by 100% renewable energy with Cloudflare Pages, now in partnership with The Green Web Foundation, for which we have received a green certification.</p> <p>Companies that commit to powering their operations with 100% renewable energy with Cloudflare are required to match their total energy used with electricity produced from renewable sources, and in fact our office premises use 100% renewable REGO sustainable green electricity.</p>

Data Privacy & Freedom of Expression	Description of policies and practices relating to behavioral advertising and user privacy	Discussion and Analysis	n/a	TC-SI-220a.1	<p>PensionBee is the data controller for the personal information we collect unless otherwise specified. We take the security of our customers' personal information very seriously.</p> <p>We take administrative, legal, technical and physical precautions to ensure the security of personal information. We will ensure that our customers' personal data is processed lawfully, fairly, and transparently, without adversely affecting their rights, and in line with the Data Protection Act 2018 and the UK General Data Protection Regulation. All cookies used by and on our website are used in accordance with current UK law.</p> <p>All communications between our customers' browsers and our website are secured using 128-bit TLS encryption, to ensure that only people authorised to view their personal information can do so. Information is stored in secure databases and data centres accredited to multiple internationally recognised standards. Our security controls are tested on an annual basis by independent experts and PensionBee maintains certification to the ISO/IEC 27001:2013 standard for information security management systems. PensionBee systems undergo an annual vulnerability assessment as part of certifying to the Cyber Essentials Plus scheme.</p> <p>Customers are additionally protected from identity fraud and account compromise using a variety of techniques including digital customer identity verification, which incorporates a cutting-edge facial similarity check, bank account verification and multi-factor authentication.</p>
	Number of users whose information is used for secondary purposes	Quantitative	Number	TC-SI-220a.2	0
	Total amount of monetary losses as a result of legal proceedings associated with user privacy	Quantitative	Reporting currency	TC-SI-220a.3	£0
	(1) Number of law enforcement requests for user information, (2) number of users whose information was requested, (3) percentage resulting in disclosure	Quantitative	Number, Percentage (%)	TC-SI-220a.4	(1) 4 (2) 4 (3) 0%
	List of countries where core products or services are subject to government-required monitoring, blocking, content filtering, or censoring	Discussion and Analysis	n/a	TC-SI-220a.5	PensionBee is a UK-only pension provider.
Data Security	(1) Number of data breaches, (2) percentage involving personally identifiable information (PII), (3) number of users affected	Quantitative	Number, Percentage (%)	TC-SI-230a.1	0 / 0%. No breaches have occurred.
	Description of approach to identifying and addressing data security risks, including use of third-party cybersecurity standards	Discussion and Analysis	n/a	TC-SI-230a.2	<p>We engage an external specialist company to perform a Security Penetration Test to gain visibility of vulnerabilities on our IT estate. Vulnerabilities are then prioritised according to the risk and threat level and then remediated.</p> <p>We also perform regular scans on our endpoints, which gives visibility of vulnerabilities on our Endpoint estate. This is a requirement to ensure compliance with our Cyber Essentials Plus accreditation.</p> <p>We conduct regular phishing tests with our employees and host regular cyber awareness training sessions to promote a culture of security awareness.</p>
Recruiting & Managing a Global, Diverse & Skilled Workforce	Percentage of employees that are (1) foreign nationals and (2) located offshore	Quantitative	Percentage (%)	TC-SI-330a.1	(1) 27% (2) 2%
	Employee engagement as a percentage	Quantitative	Percentage (%)	TC-SI-330a.2	In our 2022 Diversity, Inclusion, Equality & Support Survey, 91% of employees said they feel aligned with PensionBee's mission, vision and values whilst 79% said they feel a sense of belonging at PensionBee.
	Percentage of gender and racial/ethnic group representation for (1) management, (2) technical staff, and (3) all other employees	Quantitative	Percentage (%)	TC-SI-330a.3	(1) <u>Management</u> <i>Gender</i> - Female & minority genders: 45% - Male: 53% - No response or rather not say: 3% <i>Racial/ethnic group</i> - Asian or Asian British: 10.5% - Black, African, Caribbean or Black British: 11.5% - Mixed or Multiple Ethnic Groups: 3% - White: 71% - Latin(a/o/x) & Other: 9% - No response or rather not say: 3%
					(2) <u>Technical staff</u> <i>Gender</i> - Female & minority genders: 19% - Male: 74% - No response/rather not say: 6% <i>Racial/ethnic group</i> - Asian or Asian British: 23% - Black, African, Caribbean or Black British: 6% - Mixed or Multiple Ethnic Groups: 0% - White: 55% - Latin(a/o/x) & Other: 13% - No response or rather not say: 3%
					(3) <u>All other employees</u> <i>Gender</i> - Female & minority genders: 52% - Male: 44% - No response/rather not say: 4% <i>Racial/ethnic group</i> - Asian or Asian British: 13% - Black, African, Caribbean or Black British: 14% - Mixed or Multiple Ethnic Groups: 7% - White: 57% - Latin(a/o/x) & Other: 6% - No response or rather not say: 3%
Intellectual Property Protection & Competitive Behavior	Total amount of monetary losses as a result of legal proceedings associated with anti-competitive behavior regulations	Quantitative	Reporting currency	TC-SI-520a.1	£0
Managing Systemic Risks from Technology Disruptions	Number of (1) performance issues and (2) service disruptions; (3) total customer downtime	Quantitative	Number, Days	TC-SI-550a.1	In the calendar year 2022, we had 9 unplanned outages, which resulted in a total downtime of 127 minutes. Our overall SLA of IT Availability was not breached for the year. No significant Business Continuity Risks crystallised in 2022.
	Description of business continuity risks related to disruptions of operations	Discussion and Analysis	n/a	TC-SI-550a.2	<p>We have a Business Continuity Plan and Cyber Response Plan, which were tested twice in 2022. A Communications workflow has been developed off the back of the test to further improve our processes. We also take backups of our key systems and have tested the restoration in 2022 for assurance purposes.</p> <p>We have visibility and identification of all Assets, which have also been prioritised in respect of criticality.</p> <p>Our insurance cover is £5M for business interruption.</p>
Table 2. Activity Metric					
	(1) Number of licenses or subscriptions, (2) percentage cloud-based	Quantitative	Number, Percentage (%)	TC-SI-000.A	~1000 licenses subscriptions across all services, 100% are Cloud-based.
	(1) Data processing capacity, (2) percentage outsourced	Quantitative	See note	TC-SI-000.B	This is 100% outsourced to multiple Cloud Providers.
	(1) Amount of data storage, (2) percentage outsourced	Quantitative	Petabytes, Percentage (%)	TC-SI-000.C	0.002 Petabytes of storage consumption, all storage is provider by Cloud Providers.