

Sustainable Procurement Policy



Introduction

At ICON, our mission is to improve patients' lives by accelerating the development of our customers' drugs and devices through innovative solutions. We recognise that conducting business responsibly and sustainably is fundamental to protecting the health and wellbeing of our people, patients, communities and the environment.

Our commitment to sustainability is embodied within the ICON Cares programme, our Environmental, Social and Governance (ESG) framework, which brings together our initiatives and commitments to create long-term value through responsible business practices.

This Sustainable Procurement Policy establishes the principles, expectations, and requirements that guide how ICON engages with suppliers and how suppliers are expected to support our sustainability objectives.



Mission

ICON is committed to sustainable procurement through the development and maintenance of a responsible, ethical, resilient, and sustainable supply chain, underpinned by clear expectations, collaboration, and continuous improvement.

Goal

To source goods and services from suppliers that demonstrate environmental and social responsibility, uphold the highest standards of ethics and governance, and promote fair and inclusive practices throughout their operations and supply chains.

Purpose & scope

This policy outlines ICON's approach to sustainable procurement and applies to all suppliers providing goods and services to ICON globally. It establishes the standards we expect suppliers to meet, and the actions ICON will take to support the development of a more sustainable supply chain including:

- Establishing objectives, targets and programs that support sustainable procurement
- Integrating environmental, social, ethical and governance considerations into supplier selection, assessment and management processes
- Collaborating with suppliers to improve sustainability performance across the supply chain
- Providing suppliers with guidance, resources and support regarding sustainability topics
- Monitoring and managing sustainability-related risks within the supply chain
- Promoting transparency, accountability and continuous improvement
- Communicating progress and achievements in building a more sustainable and responsible supply chain

Sustainable procurement objectives

Aligned with the objectives of the ICON Cares programme, we expect suppliers to support responsible business practices and sustainable development principles. Suppliers are expected to make reasonable efforts to support the following areas:

Ethics, governance and responsible business conduct

Suppliers are expected to conduct business ethically, honestly and with integrity.

Suppliers must:

- Comply with this Sustainable Procurement Policy or demonstrate equivalent standards
- Comply with all applicable laws and regulations in the countries in which they operate.
- Comply with or demonstrate equivalent standards to ICON's Global Supplier Code of Conduct.
- Complete supplier onboarding, due diligence activities, sustainability assessments and requests for information accurately and transparently.
- Maintain appropriate policies and controls relating to ethics, anti-bribery and corruption, conflicts of interest, whistleblowing, data privacy and regulatory compliance.
- Maintain (or establish) responsible sourcing practices within their own supply chains.
- Participate in sustainability assessments, programs and reviews requested by ICON.
- Support contractual sustainability commitments where applicable.
- Demonstrate a commitment to continuous improvement in sustainability performance.
- Maintain appropriate channels, or cooperate with ICON's channels, for workers and other relevant stakeholders to raise concerns relating to ethics, human rights, labour practices, environmental impacts, privacy, safety or other sustainability matters

Environmental responsibility and climate action

Suppliers are expected to actively manage and reduce the environmental impacts of their operations.

Suppliers should:

- Comply with applicable environmental legislation and regulatory requirements.
- Identify, monitor and manage environmental impacts associated with their business activities.
- Implement measures to reduce waste generation and promote responsible waste management.
- Promote efficient use of energy, water, and natural resources.
- Support the transition towards renewable energy sources where feasible.
- Develop initiatives to reduce greenhouse gas (GHG) emissions across their operations and value chains.
- Measure and disclose GHG emissions data when requested by ICON, including Scope 1, Scope 2, and where appropriate, Scope 3 emissions.
- Establish science-based emissions reduction targets aligned with recognised frameworks such as the Science Based Targets initiative (SBTi) or equivalent methodologies where requested by ICON.
- Support collaborative efforts to reduce emissions across the supply chain and contribute to ICON's Scope 3 emissions reduction objectives.
- Manage waste responsibly and in accordance with applicable environmental laws.

Sustainability assessment, engagement and reporting

To support transparency and continuous improvement, ICON may request suppliers to participate in sustainability performance programmes.

Depending on supplier risk, spend, impact or strategic importance, suppliers may be requested to:

- Complete or improve a sustainability assessment through EcoVadis.
- Share sustainability performance data and assessment results.
- Disclose greenhouse gas emissions through nominated platforms, publicly available programs or other recognised reporting mechanisms.
- Establish and/or report progress against emissions reduction targets.
- Participate in sustainability engagement plans and improvement initiatives with ICON.
- Demonstrate progress against agreed sustainability actions and performance objectives.
- Provide evidence of corrective actions where sustainability risks or performance gaps are identified.

Fair & inclusive working practices

Suppliers must provide a safe, respectful, and inclusive working environment and uphold internationally recognised human rights principles.

Suppliers are expected to:

- Comply with the obligations outlined in ICON's Global Supplier Code of Conduct.
- Comply with applicable labour and employment laws.
- Support internationally recognised human rights and labour standards, including the UN Guiding Principles on Business and Human Rights, the ILO Declaration on Fundamental Principles and Rights at Work and the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct.
- Maintain safe and healthy workplaces.
- Implement policies and processes supporting employee wellbeing, fair treatment and equal opportunity.
- Promote fair and inclusive employment practices.
- Support equal opportunity and non-discrimination throughout recruitment, development, advancement, and retention activities.
- Extend expectations relating to inclusion across their supply chains.

Risk-based approach

ICON applies sustainable procurement requirements using a risk and impact-based approach.

The level of due diligence, monitoring, engagement and contractual requirements applied to a supplier is proportionate to supplier risk, potential impact, ICON's relationship with the supplier, and the supplier's role in supporting ICON's operations, client commitments and sustainability objectives.

While **all** suppliers are expected to comply with the principles outlined in this policy and the Global Supplier Code of Conduct, additional requirements may apply depending on factors including:

- Supplier risk profile
- Nature of products or services provided
- Spend category
- Environmental or social impact
- Regulatory requirements
- Strategic importance to ICON's operations

Continuous improvement

ICON considers sustainability performance during supplier selection, onboarding, renewal, contracting and evaluation, proportionate to risk and impact. Where suppliers do not meet required standards, this may influence ICON's procurement decisions and supplier relationship management activities.

ICON recognises that suppliers may be at different stages of their sustainability journey. We are committed to working collaboratively with suppliers to encourage meaningful progress and support continuous improvement.

Where sustainability risks, impacts or performance gaps are identified, suppliers are expected to cooperate with ICON in assessing the issue, implementing appropriate corrective or preventive actions and providing evidence of progress within agreed timeframes. ICON will consider supplier engagement, commitment, transparency and progress when assessing sustainability performance.

Where material concerns are identified and a supplier is unwilling or unable to demonstrate appropriate remediation or improvement, ICON may suspend, limit, or terminate the business relationship in accordance with contractual rights and applicable laws.

Policy governance

This Sustainable Procurement Policy is owned by the Global Procurement function. The Procurement Vice President has overall accountability for its implementation, with oversight provided through ICON's relevant management and governance arrangements.

Global Procurement co-ordinates implementation of this policy and integrates relevant sustainability considerations into supplier selection, onboarding, due diligence, contracting, renewal and performance management. Business owners and supplier relationship managers are responsible for applying the policy within their areas of responsibility and escalating material concerns through ICON's established governance processes. Suppliers are responsible for meeting the requirements applicable to them and cooperating with reasonable due diligence, monitoring and corrective-action requests.

ICON monitors implementation of this policy through risk-based supplier due diligence, sustainability assessments, supplier performance information, contractual controls, supplier engagement and corrective-action processes. Material sustainability risks, significant non-conformances and relevant performance trends are reported to the appropriate management or governance forum in accordance with ICON's internal reporting and escalation arrangements. Outcomes may inform updates to procurement processes, supplier requirements, training, engagement activities and this policy.

This policy is reviewed periodically or following material changes to applicable legal or regulatory requirements, ICON's sustainability priorities, business activities, supplier risk profile or relevant stakeholder expectations. Material amendments are approved by the Procurement Vice President or authorised delegate.

This policy is made available to suppliers and other relevant stakeholders through ICON's corporate website and appropriate procurement, onboarding, contracting and supplier-management channels. Suppliers may be required to acknowledge this policy, confirm compliance, demonstrate equivalent standards, or agree to contractual sustainability commitments proportionate to their risk profile, spend, strategic importance and potential sustainability impact. Relevant ICON personnel receive access to the policy, together with appropriate guidance to support its implementation.

For questions regarding this policy or ICON's Sustainable Procurement Programme, please contact:

sustainableprocurement@iconplc.com

Supporting information

This policy supports ICON's management of material sustainability impacts, risks and opportunities associated with its supply chain, including those relating to climate change, workers, affected communities, consumers and end-users, and business conduct. It forms part of ICON's sustainability due diligence approach and contributes to the identification, prevention, mitigation and management of actual and potential adverse impacts connected to procurement activities and supplier relationships. ICON provides appropriate sustainable procurement and responsible sourcing training and guidance to relevant Procurement personnel and other employees involved in supplier selection and management. Training is refreshed periodically, taking account of role, supplier risk and changes in applicable sustainability requirements.

Where relevant to the nature of the goods or services provided, supplier location, operating context or supply-chain activity, ICON considers actual and potential impacts on affected communities, patients, clinical-trial participants and other consumers or end-users. Suppliers are expected to support safeguards that protect health, safety, privacy, dignity, access, inclusion and respect for human rights in relation to the products, services and activities they provide to ICON.

In developing and reviewing this policy, ICON considers relevant information from stakeholders who may be affected by its procurement activities and supplier relationships. This may include information obtained through supplier engagement, workforce and grievance channels, patient and clinical-trial participant safeguards, sustainability assessments and engagement with relevant internal subject-matter experts.

Document history

Effective date	Version	Brief summary of changes
August 2026	V2.0	Reformatting of policy Expanded policy to align with ICON's sustainable procurement programme and CSRD/ESRS policy disclosure expectations, including linkage to material ESRS topics E1, S1, S3, S4 and G1. Enhanced supplier due diligence, risk-based implementation, affected stakeholder and end-user considerations, grievance and remediation expectations, supplier acknowledgement, corrective-action expectations, governance, review and accountability provisions; and clarified sustainability assessment, engagement and reporting requirements.



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