INSIG

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# Insig AI Plc
# Sustainability Report
# 2025

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# Introduction

This Report has been prepared internally and approved by the Board of Directors for publication in conjunction with the Annual Report and Accounts for the period 1 April 2024 to 31 March 2025.

In line with the Quoted Companies Alliance Corporate Governance Code, in conjunction with the Annual Report and our website, this report provides details on the company's governance around climate-related risks and opportunities, the process for identifying, assessing and managing climate-related risks and how these processes are integrated into the company's overall risk management framework.

# Approach to Sustainability

Insig AI believes that businesses have a duty to behave sustainably and responsibly in a way that minimises harm, and benefits society and our planet. One of Insig AI's main business areas is providing innovative software to optimise and support best practice on Environment, Social and Governance (ESG) research and analysis. When it comes to our own impacts and risks, we want to demonstrate leadership in this space for a company of our size and industry.

# Summary

## Our impacts

Insig AI's solutions include data engineering, the corporate document dataset, the Transparency and Disclosure Index, consultancy services, and the Generative Intelligence Engine, a new solution which incorporates Generative AI.

Our mission for these solutions as a whole is to drive best practice, transparency and evidence-based decision making in corporate sustainability reporting and investment by leveraging best available technology to transform and analyse messy data. In this way, we strive to contribute a positive impact through our products and services, R&D and innovation. At the same time, no business can exist without some environmental footprint, and this report sets out how we have assessed and seek to minimise our negative impacts.

## Our risks

ESG is a risk-orientated framework for stakeholders to assess non-financial factors that can impact a business' sustainability and resilience. We have taken a view on priority factors from the materiality approach of the IFRS Foundation, now responsible for SASB Standards, combined with our own position on social responsibility and expertise on how to mitigate these risks.

### Governance of climate-related risks and opportunities

Our Head of ESG Solutions oversees the process for identifying, assessing and managing climate-related risks as part of their role on the Management Team. This is done in coordination with other Heads of Department, mainly the Chief Technology Officer who is responsible for managing Insig AI's data storage and processing within Amazon Web Services (AWS), and 3rd party Generative AI model procurement.

The risk management framework chosen for this process and reporting is the IFRS Foundation Sustainability Accounting Standard (SASB) framework for Software and IT Services v 2023-12. This sustainability report is prepared in line with that framework and has been chosen for its materiality for Insig AI's sector. However, not all metrics are reported on each year as we evaluate them as not relevant (or not available) for a business of our current size and footprint. We will keep reviewing this year on year.

Materiality refers to financially relevant issues that are reasonably likely to impact the financial condition or operating performance of a company and, thereby, are most important to investors. A summary table of these standards is contained in Appendix A and accounting metrics are referenced in the report alongside the relevant disclosure.

## Overview of key issues

### Data security and privacy

Data security and data privacy are the highest material risks to the business. A critical incident can lead to the loss of confidential material and service disruptions; cause serious reputational risk in terms of damaging client confidence; and ultimately compromise our ability to retain our clients.

Details of our Information Security Management System which exists to mitigate these risks are reported below.

### Workforce

Our skilled workforce and the intellectual property (IP) we hold are fundamental to the success of Insig AI, and loss of these is identified as a risk. A healthy working environment, fair pay and diversity are built into our culture and these factors also enable us to attract and retain the best talent. We report on our HR policies and procedures below and publish a certain number of these on our website.

### Environmental risk and impact

As a small, hybrid-working company that uses predominantly renewables-based cloud computing for software development, we assess that our direct environmental impact and risk are relatively low.

Regarding indirect environmental impact and risk, our business model has recently shifted towards the usage of Generative AI in our solutions, relying on LLM models from 3rd party providers. This has created an inevitable increase in our annual emissions. We discuss this

further in the Open AI emissions section below and report an estimate of our main indirect carbon emissions below and in Appendix D.

### Corporate Governance

We believe strong corporate governance is fundamental to the long-term success of all businesses and we hold ourselves to high standards.

Insig AI follows the 2023 QCA Corporate Governance Code and our website communicates how we comply with its Principles here. Other relevant policies such as on anti-bribery and whistleblowing are detailed below and on our website here.

***The following section of the report provides detail on the key risks and impacts we have identified and how these are being managed and mitigated.***

## Data Security

### Information Security Management System

Insig AI has an approach to ISMS (Information Security Management System) which supports the governance and oversight of critical incident risk management as well as systemic risk management for both data privacy and cyber security.

### Data security

The Information Security Officer reports any data security breach to the CEO. During the reporting period, there were no data breaches (TC-SI-230a.1).

As part of Insig AI's approach to identifying and addressing data security risks, all policies and procedures are documented and available online for all staff, including:

- Breach and Incident Reporting Policy
- Data Breaches – What do I need to know?
- General Data Protection Policy

### Systematic risks from technology disruptions

Insig AI did not experience a performance incident or downtime issue that had a material impact on the business that required regulatory reporting to authorities or incurred financial penalties (TC-SI-550a.1).

The nature of Insig AI's business reduces the importance and prioritisation of proactive business continuity measures. Our business continuity program is based on cloud-based technology and the regeneration of environments using automated DevOps processes (TC-SI-550a.2).

### ISO27001 process

We continue to use the ISO27001 management system to embed information security in the organisation. Our ISO implementation was independently audited in October 2021. A decision has been made that as certification is not a business-critical priority, we are not performing monthly checks (TC-SI-230a.2).

### Cyber security

All staff are made aware of secure behaviour around password policies, two factor authentication, data sharing and other high-risk activities via internal training.

We use DevOps best practices to secure all infrastructure, and to limit access to it on an as-needed basis. Our on-boarding and off-boarding processes are strictly enforced and automated as far as possible.

### Data privacy

Upholding the highest standards of client and staff data privacy is core to our business, recognising that this is our duty and would present a risk to our operations and reputation if not upheld.

Insig AI does not store Personally Identifiable Information (PII) or use any of its users' data for secondary purposes (SASB TC-SI-220.a.2) and has not had any incidents or legal proceedings associated with data privacy in the reporting period, or previously (SASB TC-SI-220a.3).

Insig AI has had no law enforcement requests for user information (SASB TC-SI-220a.4) and none of our products or services are used in countries subject to government censoring (SASB TC-SI-220a.5).

Regarding staff data privacy, policies are made available to staff including:

- Retention and Destruction Policy
- Privacy Notice for Staff

## Workforce

As innovators in software development, Insig AI depends on the skilled technical and intellectual property of its staff, and their wellbeing and retention are a priority.

Insig AI makes over 20 workforce policies available internally for staff on the company Notion instance including:

- Absence Due to Illness and Injury Policy
- Adoption Policy
- Bullying and Harassment Policy
- Compassionate Leave Policy
- Disciplinary Policy
- Equal Opportunity Policy

- Flexible Working Policy
- Grievance Policy
- Health and Safety Policy
- Maternity Policy
- Parental Leave Policy
- Paternity Leave Policy
- Social Media Policy
- Social Media Use – Guidelines
- Time Off for Adoption Appointments Policy
- Time Off for Antenatal Appointments Policy
- Time Off for Dependants Policy

We also make public a selection on our website as detailed below.

## Workforce wellbeing

Insig AI offers private healthcare to its staff.

Staff continue to predominantly work remotely but are increasingly encouraged to access WeWork spaces where appropriate. Insig AI plans to continue hybrid working in line with its Flexible Working Policy for the foreseeable future and believes it brings work-life balance benefits.

## Health and safety

The Health and Safety of staff and anyone visiting our premises or affected by our work is the responsibility of the CEO.

Insig AI's Health and Safety Policy can be found in the *Shareholder Documents* section of our website.

## Diversity, inclusion and equality

Insig AI believes in supporting the pipeline of talent and opportunity, regardless of race, gender or background. We wholeheartedly support the principles of equal opportunity in employment and are opposed to all forms of unfair or unlawful discrimination.

We will treat all job applicants, employees, customers/clients, contractors and suppliers in the same way, regardless of any protected characteristic (age, disability, gender reassignment, marital or civil partnership status, pregnancy or maternity, race (including nationality, ethnic or national origin), religion or philosophical belief, sex or sexual orientation).

We believe that everyone has the right to be treated fairly and with dignity and respect at work, and to work without fear of discrimination, bullying or harassment. We employ a staff of multiple nationalities and pride ourselves on that diversity, recognising that individuals from a wide range of backgrounds can contribute a wealth of experience to achieving our objectives.

The percentage of women at different levels of the business is as follows, full time employees only, as at 31 March 2025 (TC-SI.330a.3):

| | **31 March 2025** | **31 March 2024** |
|---|---|---|
| Board | 0% | 0% |
| Management (Head of Dept) | 33% | 50% |
| Skilled Technical | 50% | 67% |

In explanation of these year-on-year changes since 2024, a male Board member moved into Management and a female Head of Department left the company, decreasing % of women to 33%. A number of Skilled Technical roles have been added, which has decreased female representation to 50%.

We don't currently report on racial/ethnic group representation, employee engagement and foreign nationals including those located offshore, or contractors whether part or full-time.

Insig AI's Equal Opportunity Policy can be found in the *Shareholder Documents* section of our website.

### Bullying and harassment

We believe that all our employees, contractors and workers have the right to work in an environment free from bullying behaviour and any form of harassment, whether this is on the grounds of a protected characteristic (age, disability, gender reassignment, marital or civil partnership status, pregnancy or maternity, race (including nationality, ethnic or national origin), religion or philosophical belief, sex, sexual orientation) or indeed any other characteristic such as appearance, regional dialect or political stance.

Such behaviour will not be tolerated, and we seek to ensure that our working environment is sympathetic to everyone with whom we deal with in our working activities and that they are treated with dignity and respect.

Insig AI's Bullying and Harassment Policy can be found in the *Shareholder Documents* section of our website here.

## Environmental Risk and Impact

Insig AI is a hybrid-working company which leases a minimal office space (see below for our WeWork environmental footprint). As a result, we assess that our direct environmental risks and impacts around climate change, water, environment, waste generation and biodiversity are not currently material.

We report in line with the SASB framework below regarding our indirect Greenhouse Gas (GhG) emissions and will seek to report on water-related information in the future where available from WeWork, Open AI and AWS or other key providers.

## Climate change – indirect GhG emissions

In the 2024-2025 financial year, our total GhG emissions (direct and indirect) was 12.62 TCO2e, which is a decrease from 43.668 TCO2e the previous year. This is based on our calculations of estimated emissions related to staff travel, data centre usage, Generative AI usage and leased office space, as detailed below.

## Travel

Several members of staff live abroad and work remotely with minimal requirement for travel. Internal and external meetings are conducted virtually wherever possible and international travel is kept to a minimum.

Certain management staff take international flights regularly as required for in-person meetings. Their combined annual carbon footprint is estimated to be a total of 12.009 tCO2e for the reporting period. This is a decrease on the previous reporting year estimate of 43.7 tCO2e, mainly due to a circumstantial shift from a long-haul to short-haul flight requirements. As in previous years, this calculation has been done using www.myclimate.org. Greenhouse gas emissions are commonly measured in metric tonnes (MT) of Carbon Dioxide equivalent - MTCO2e or tCO2e.

## Data centres

There is an energy demand associated with cloud computing data storage centres from 3rd party providers. Insig AI's main provider is Amazon Web Services (AWS).

AWS's emissions measurement tool estimates that Insig AI's total emissions for the period March 2024 – April 2025 was 0.002 MTCO2e (TC-SI-130a.1). This a small increase on the previous year from 0 MTCO2e. See Appendix B for AWS carbon emissions report for Insig AI.

## Generative AI

During this reporting year, Insig AI began employing Generative AI Large Language Models (LLMs) as part of our business model shift, predominantly through the ChatGPT API provided by OpenAI.

At present, OpenAI does not disclose comprehensive data on the carbon emissions or water consumption associated with its models. This reflects a wider lack of transparency across the rapidly developing Generative AI sector, where the environmental impacts of energy and water use remain insufficiently measured or reported.

Insig AI recognises the potential environmental footprint of LLMs and is committed to managing our usage responsibly, while being transparent in our reporting. However, given the current absence of reliable data, we are unable to provide a robust calculation of the carbon emissions attributable to our use of OpenAI's models.

The best publicly available estimates currently calculate energy consumption on a per-query basis (with a query comprising a variable number of tokens). However, applying this method to our activity is problematic as it does not account for the wide variation in tokens per query, nor does it provide a meaningful measure across our overall annual usage. As a result, any attempt to assess total CO2e emissions for our Generative AI usage would not be reliable.

To support future transparency, we are disclosing our total token usage for the reporting period in Appendix D. This will enable retrospective analysis should more robust metrics (e.g., emissions per token) be published by OpenAI or other reliable sources in the future.

## Offices

Two Insig AI team members attend WeWork offices 2-3 days a week and others on an ad-hoc basis, predominantly using the 123 Buckingham Palace Road shared workspace.

We have made an estimate of the associated carbon emissions based on WeWork's sustainability calculations for this property and our usage of it.

For the period 6 April 2024 and 4 April 2025, Insig AI had two 'member desks' for 123 Buckingham Palace Rd, for usage up to 3 days a week.

WeWork provides and Energy & Sustainability Report for Insig AI (see Appendix C). The report states that the building runs on renewable energy and has policies for zero waste to landfill, plastic free, food waste recycling and green cleaning.

According to WeWork's office sustainability calculations based on our usage of the WeWork's 123 Buckingham Palace Road office, the estimated annual carbon footprint is 0.6063 TCO2e.

**Summary of WeWork Energy & Sustainability Report: 6 April 2024 – 5 April 2025**

| Impact Category | Quantity | Unit of Measure |
|---|---|---|
| Greenhouse gas emissions | 0.6063 | TCO2e |
| Water Usage | 7.3 | $m^3$ |

## Water – indirect water consumption

We do not currently have water consumption and water stress data for the AWS servers or Open AI and will seek to include this in future disclosure in line with the SASB accounting metrics. AWS make their own water policy available here.

As per the above table based on WeWork's sustainability calculations for Insig AI's usage of the premises, the total estimated water consumption in relation to the WeWork office space is 7.3$m^3$.

## Corporate Governance

The corporate governance framework within which the company operates is based upon practices which the Board believes are appropriate and proportionate to the size and complexity of the Company and its business. The Board has chosen to adhere to the Quoted Companies Alliance Corporate Governance Code for small and mid-size quoted companies ("QCA Code").

The 2023 QCA Code identifies 10 principles that they consider to be appropriate and asks companies to provide an explanation on how they meet those principles. The Board has considered these principles and how the company meets them given the size of the company. The results of our review are set out online here.

These disclosures are set out on the basis of the current company and the Board highlights where it has departed from the QCA Code presently. The Board will continue to develop its governance processes in the coming year where appropriate.

The following documents are shared internally with staff, some of which can also be found in the *Shareholder Documents* section of our website here.

- Whistleblowing Policy
- Business Ethics and Integrity Policy
- Anti-Bribery and Corruption Policy
- Criminal Finances Act Policy
- Market Abuse (Insider Trading) Policy

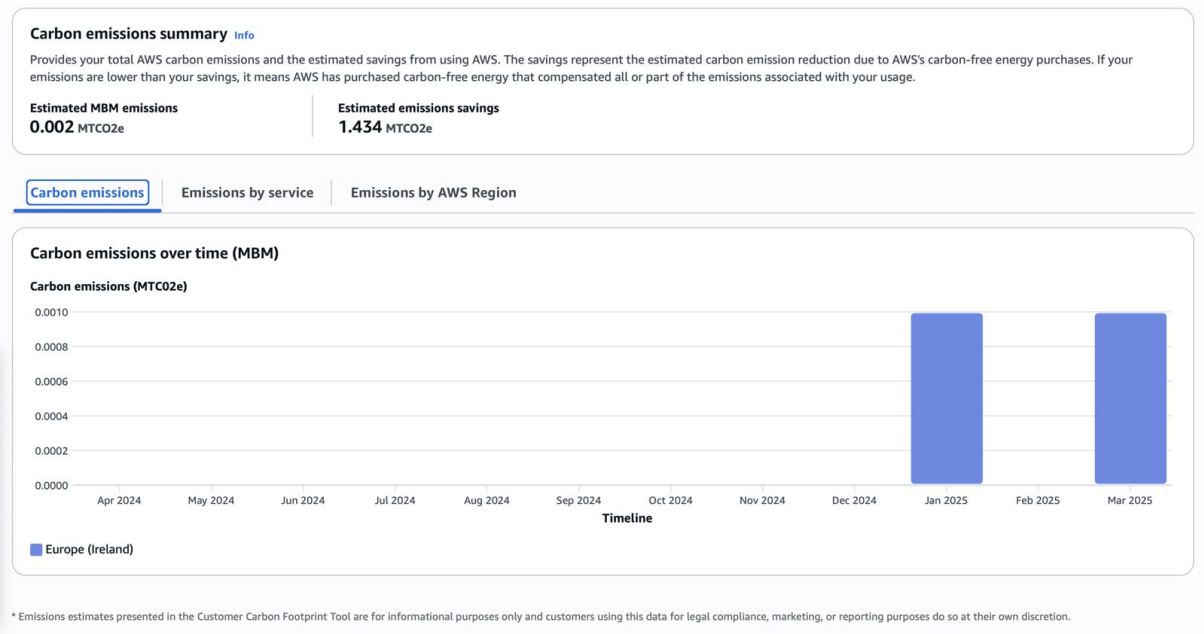
# Appendix A: IFRS (SASB) Software and IT Services Standard (version 2023-12): Sustainability Disclosure Topics and Accounting Metrics

| TOPIC | METRIC | CATEGORY | UNIT OF MEASURE | CODE |
|---|---|---|---|---|
| Environmental Footprint of Hardware Infrastructure | (1) Total energy consumed, (2) percentage grid electricity and (3) percentage renewable | Quantitative | Gigajoules (GJ), Percentage (%) | TC-SI-130a.1 |
| | (1) Total water withdrawn, (2) total water consumed; percentage of each in regions with High or Extremely High Baseline Water Stress | Quantitative | Thousand cubic metres ($m^3$), Percentage (%) | TC-SI-130a.2 |
| | Discussion of the integration of environmental considerations into strategic planning for data centre needs | Discussion and Analysis | n/a | TC-SI-130a.3 |
| Data Privacy & Freedom of Expression | Description of policies and practices relating to targeted advertising and user privacy | Discussion and Analysis | n/a | TC-SI-220a.1 |
| | Number of users whose information is used for secondary purposes | Quantitative | Number | TC-SI-220a.2 |
| | Total amount of monetary losses as a result of legal proceedings associated with user privacy [1] | Quantitative | Presentation currency | TC-SI-220a.3 |
| | (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 |
| | List of countries where core products or services are subject to government-required monitoring, blocking, content filtering, or censoring [2] | Discussion and Analysis | n/a | TC-SI-220a.5 |
| Data Security | (1) Number of data breaches, (2) percentage that are personal data breaches, (3) number of users affected [3] | Quantitative | Number, Percentage (%) | TC-SI-230a.1 |
| | 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 |

| TOPIC | METRIC | CATEGORY | UNIT OF MEASURE | CODE |
|---|---|---|---|---|
| Recruiting & Managing a Global, Diverse & Skilled Workforce | Percentage of employees that require a work visa [4] | Quantitative | Percentage (%) | TC-SI-330a.1 |
| | Employee engagement as a percentage [5] | Quantitative | Percentage (%) | TC-SI-330a.2 |
| | Percentage of (1) gender and (2) diversity group representation for (a) executive management, (b) non-executive management, (c) technical employees, and (d) all other employees [6] | Quantitative | Percentage (%) | TC-SI-330a.3 |
| Intellectual Property Protection & Competitive Behaviour | Total amount of monetary losses as a result of legal proceedings associated with anti-competitive behaviour regulations [7] | Quantitative | Presentation currency | TC-SI-520a.1 |
| Managing Systemic Risks from Technology Disruptions | Number of (1) performance issues and (2) service disruptions; (3) total customer downtime [8] | Quantitative | Number, Days | TC-SI-550a.1 |
| | Description of business continuity risks related to disruptions of operations | Discussion and Analysis | n/a | TC-SI-550a.2 |

| ACTIVITY METRIC | CATEGORY | UNIT OF MEASURE | CODE |
|---|---|---|---|
| (1) Number of licences or subscriptions, (2) percentage cloud-based | Quantitative | Number, Percentage (%) | TC-SI-000.A |
| (1) Data processing capacity, (2) percentage outsourced[9] | Quantitative | See note | TC-SI-000.B |
| (1) Amount of data storage, (2) percentage outsourced[10] | Quantitative | Petabytes, Percentage (%) | TC-SI-000.C |

# Appendix B: Insig AI WeWork AWS Carbon Report, April 2024-March 2025



# Appendix C: Insig AI WeWork Energy & Sustainability Report, April 2024 - April 2025

# Energy & Sustainability Report

Important information about your membership

## Member information

**Member name:** Insig

**Member desks:** 2

**Member Building:** 123 Buckingham Palace Rd

**Report start:** 06/04/2024

**Report end:** 05/04/2025

| | |
|---|---|
| 0.6063 TCO2e<br>Greenhouse Gas (GHG) emissions | 0.00 kWh<br>District heating consumption |
| 1049 kWh<br>Electricity consumption | 30 / 28 kg<br>General Waste / Mixed Recycling |
| 449.89 kWh<br>Natural gas consumption | 7.3 $m^3$<br>Water usage |

## About your building

| Renewable Electricity | Building Certification | Zero Waste to Landfill | Plastic Free Building | Food Waste Recycling | Green Cleaning |
|---|---|---|---|---|---|
| ✓ | N/A | ✓ | ✓ | ✓ | ✓ |

## Data table

| Impact Category | Quantity | Unit of Measure |
|---|---|---|
| Greenhouse Gas (GHG) emissions | 0.6063 | TCO2e |
| Electricity consumption | 1049 | kWh |
| Natural gas consumption | 449.89 | kWh |
| District heating consumption | 0.00 | kWh |
| General Waste / Mixed Recycling | 30 / 28 | kg |
| Water usage | 7.3 | $m^3$ |

| Calculation Description |
|---|
| Emissions are made up of Scope 1 and 2 as per the GHG Reporting Protocol |
| Total kWh consumed for the building / total building desk number x Member desk total |
| Total kWh consumed for the building / total building desk number x Member desk total |
| Total kWh consumed for the building / total building desk number x Member desk total |
| Total building waste & recycling created by the building / total building desk number x Member desk total |
| Total water used for the building / total building desk number x Member desk total |

*Where no value is shown for Natural Gas or District Heating, the building's heat source is from Electricity only.

# Appendix D: Insig AI Open AI API usage, 1 April 2024 – 31 March 2025

**Summary of Open AI API usage – 1 April 2024 - 31 March 2025**

| Month | Model Requests | Input Tokens | Output Tokens |
|---|---|---|---|
| April-24 | | | |
| May-24 | | | |
| June-24 | | | |
| July-24 | | | |
| August-24 | 248 | 5,433,125 | 120,419 |
| September-24 | 130 | 3,112,754 | 96,131 |
| October-24 | 214 | 9,027,610 | 191,063 |
| November-24 | 407 | 15,353,677 | 130,048 |
| December-24 | 2,078 | 37,956,867 | 309,463 |
| January-25 | 67,031 | 808,688,220 | 14,960,060 |
| February-25 | 18,791 | 338,209,714 | 5,906,511 |
| March-25 | 3,515 | 74,914,872 | 1,402,864 |
| **Total** | **92,414** | **1,292,696,839** | **23,116,559** |