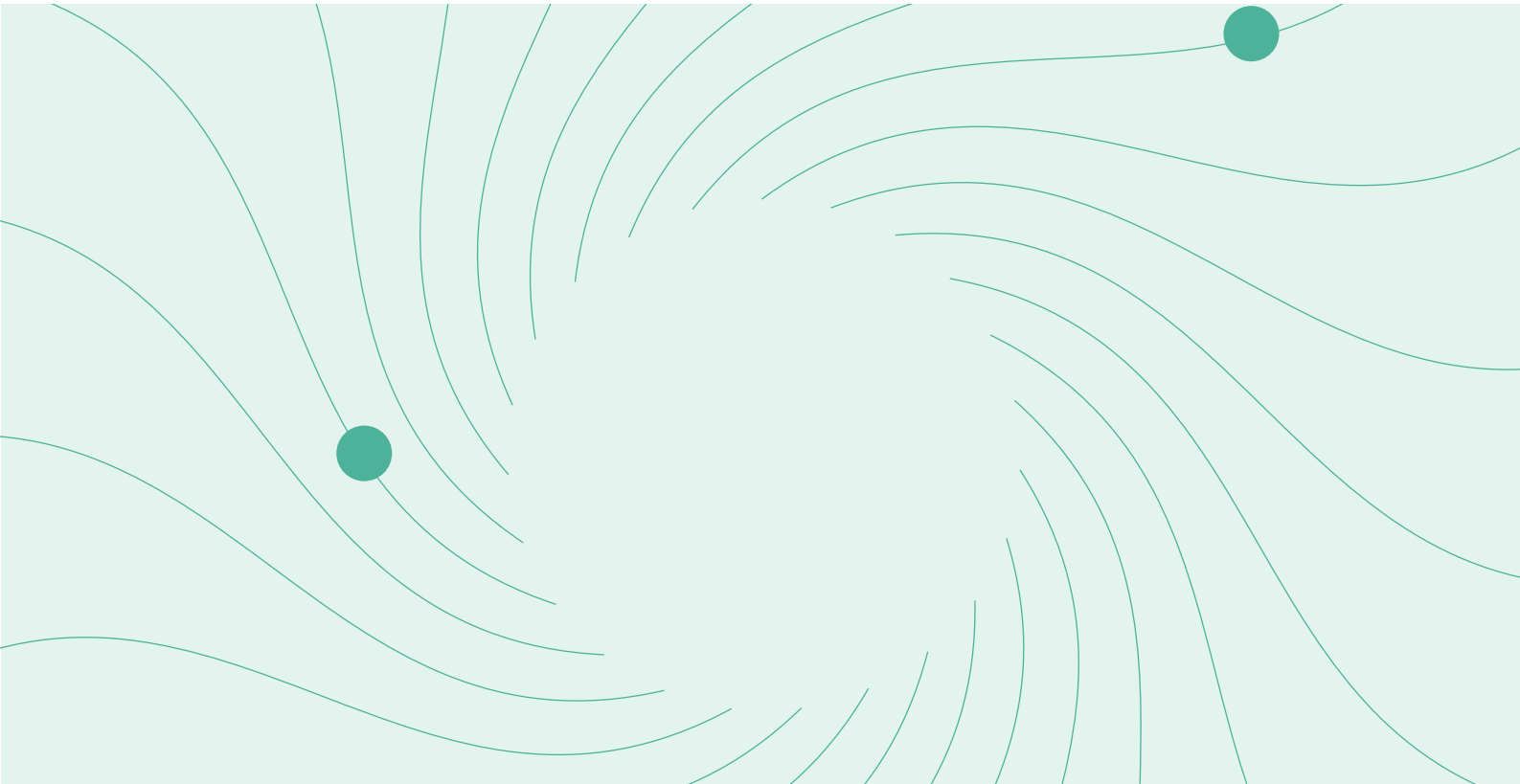




Thomson Reuters Human Rights Policy



Policy Owner:	Vice President, Government Affairs and ESG	Date Issued:	March 2023
Approved by:	Chief People Officer, Chief Legal Officer/Corporate Secretary	Last Updated:	February 2025
Policy Contact:	Social Impact Institute	Review Cycle:	Annual

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CEO STATEMENT

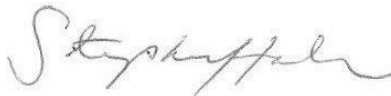
At Thomson Reuters, we believe that upholding human rights, and treating people with dignity and respect is fundamental to our [Purpose](#) of informing the way forward. We do this by delivering trusted content and technology that professionals and institutions need to make vital decisions every day. How we conduct ourselves is as important as the work we do.

Our Trust Principles and our Code of Business Conduct and Ethics reflect our ethical values as an organization and our approach to doing business. Our Human Rights Policy is an extension of those commitments and exemplifies our understanding of the fundamental human rights of all, our commitment to respecting those rights and our approach to managing human rights issues. We actively foster a respectful, safe, and inclusive work environment and hold ourselves and those we do business with accountable and to the highest standards.

Thomson Reuters position on human rights is informed by our endorsement of the United Nations Guiding Principles on Business and Human Rights (UNGPs), the United Nations Global Compact (UNGC) and our commitment to respect international human rights principles and standards. Every employee is expected to understand and comply with this Policy.

We strive to make positive contributions in the world. Our Human Rights Policy is one more way we seek to inform our colleagues, our customers, our shareholders and those in the communities where we operate and do business, of our commitment and approach to human rights.

Steve Hasker



President and Chief Executive Officer
Thomson Reuters

1 CONTEXT

1.1 Purpose

As a leading provider of content and technology that powers professionals and institutions, Thomson Reuters is a global, diverse company that is led by our values and guided by our Trust Principles, including our duty to operate with integrity, independence, and freedom from bias. Trust is at the heart of everything we do, and we work diligently to protect it. We understand how our actions impact others and we strive to do the right thing for the right reasons to generate the right outcome and make a positive difference for our colleagues, our customers, our shareholders, and the communities where we operate and do business. Foundational to this commitment is respect for human rights in every aspect of our business. The purpose of this document is to build on these foundations and articulate Thomson Reuters commitment to internationally recognized human rights and fulfil our responsibility according to the [United Nations Guiding Principles on Business and Human Rights \(UNGPs\)](#).

1.2 Scope

Thomson Reuters is committed to respecting internationally recognized human rights of our employees, data subjects, end-users (customers), workers in our supply chain, and those in the communities in which we operate. We work to avoid infringing on human rights and address adverse impacts that we may cause/contribute to and mitigate adverse impacts that are directly linked to our operations, products, or services by business relationships with third parties.

As one of the only companies in the world that helps our customers pursue justice, truth, and transparency, we work together to help uphold the rule of law, turn the wheels of commerce, catch bad actors, report the facts, and provide trusted, unbiased information to people all over the world. Through our people, products, and partnerships, we continue to make strides in tackling some of the most vexing human rights challenges.

Further information on our relevant partnerships is provided in our [Social Impact and ESG Report](#).

Thomson Reuters position on human rights is informed by our endorsement of the UNGPs, as well as our commitment to the [International Bill of Human Rights](#) (comprising the Universal Declaration of Human Rights, the International Covenant on Civil and Political Rights and the International Covenant on Economic, Social and Cultural Rights) as well as the rights contained within the core [International Labour Organization](#) conventions, and the [UN Global Compact](#).

The Policy applies to all Thomson Reuters employees (including full-time, part-time, and term employees), contractors, consultants, and applicable third parties. Contractors and consultants shall abide by Thomson Reuters Policy documents unless otherwise agreed to and documented between Thomson Reuters and its third-party supplier. We expect our business partners and suppliers to uphold the standards articulated in this Policy, supported by the [Supply Chain Ethical Code](#). We abide by all applicable laws and regulations. This Policy will be reviewed and published annually on the Thomson Reuters Social Impact Institute's homepage.

1.3 Reference Documents

1.3.1 Definitions

Thomson Reuters is committed to respecting the human rights under the following international human rights instruments:

- a) [UN Guiding Principles on Human Rights and Business \(UNGPs\)](#)
- b) [International Bill of Rights](#)
- c) [International Labour Organization](#)

1.3.2 Related Thomson Reuters Guidelines

- a) [Thomson Reuters Purpose](#)
- b) [Thomson Reuters Trust Principles](#)
- c) [Thomson Reuters Social Impact & ESG Report](#)
- d) [2022 ESG Materiality Assessment Summary](#)
- e) [Modern Slavery Act Statement](#)
- f) [2024 Proxy Circular](#)
- g) [Code of Business Conduct and Ethics](#)
- h) [Supply Chain Ethical Code](#)
- i) [Thomson Reuters Data and AI Ethical Principles](#)

1.3.3 Partnerships

We are also members, signatories, or supporters of the following frameworks and multi-stakeholder initiatives:






- a) [UN Global Compact](#)
- b) [US Department of Homeland Security Blue Campaign](#)

2 POLICY PRINCIPLES

2.1 Policy Principles

Our business impacts people across the value chain and we are committed to assessing the impacts of our business activities and prioritizing actions to address adverse human rights impacts, guided by the framework set forth in the UNGPs.

As informed by our 2022 human rights saliency assessment we focus efforts to address impacts in our engagements with our primary rightsholder groups: our business partners and suppliers, our people, our data subjects and customers, and our communities (see below). This understanding informs our human rights strategy and roadmap.

Salient Issues	Description
 Supply Chain Workers	<ul style="list-style-type: none"> Work to ensure all workers in Thomson Reuters supply chain are treated with respect and dignity, and that our suppliers comply fully with all employment laws, abide by our Supply Chain Ethical Code, and share our commitment to respecting human rights.
 Employees	<ul style="list-style-type: none"> Work to make progress on providing equal career opportunities and pay through attainment of our diversity goals and global pay reviews; Work to further ensure the safety of all employees with special emphasis on Reuters journalists, who are also active human rights defenders.
 Data Subjects	<ul style="list-style-type: none"> Work to ensure that Thomson Reuters tools and products are free from discrimination and bias, and that consumers can access and correct data to ensure no harm to individuals.
 Customers/End Users	<ul style="list-style-type: none"> Work to further enhance/improve our cybersecurity requirements/systems to safeguard sensitive consumer data from data breaches/harm by nefarious actors; strive to ensure that people with disabilities can access and benefit from our products and services.
 Community/Society	<ul style="list-style-type: none"> Work to improve accessibility measures for consumers to policies and procedures; seek to leverage our work in virtual courts to improve access to justice; work to reduce carbon emissions to achieve net zero by 2050.

2.1.2 Governance and Integration

At Thomson Reuters, our company-wide approach to managing human rights is part of the Human Resources, General Counsel's, and Operations and Technology units. Integration of this Policy and our human rights strategy across Thomson Reuters is supported by cross-functional Human Rights Steering Committee. Executive sponsorship and accountability for human rights lies with the Chief People Officer and Chief Legal Officer/Corporate Secretary.

ESG matters, including human rights issues, are overseen by the Board of Directors and its Committees. The Corporate Governance Committee provides overall ESG oversight and coordination amongst the Board of Directors' four standing Committees. The roles and responsibilities of committees are communicated annually in our [Proxy Circular](#).

We regularly review and update our human rights management process and make efforts to effectively integrate rights-respecting decision making across the company through awareness-raising activities, guidance, and tools for employees. We have policies and procedures that reinforce the company's commitment to human rights, such as the [Code of Business Conduct and Ethics](#), [Supply Chain Ethical Code](#) available in 20 languages, supplier onboarding and due diligence

processes, and the [Modern Slavery Transparency Statement](#). We actively review best practices for identifying and mitigating human rights risks.

AI Governance

No new technology development in history has moved as quickly or as decisively to the forefront of the global business agenda than generative artificial intelligence (GenAI). Accordingly, we've seen countless new corporate GenAI initiatives launched, and many new questions raised about how this technology will change the way we work.

The biggest AI investment we are making is ensuring our technology is built responsibly. This is not just an industry issue, but a societal imperative. Thomson Reuters has been leading the way on developing standards for responsible AI that will both guide future technology development and safeguard end-users. Our detailed [Data and AI Ethical Principles](#) outline the specific priorities governing our development of AI-enabled technologies and our Ethics Advisory Committee is working hard to ensure that we identify and mitigate the ethical risks of AI products before we develop them in-house or purchase them from third-party vendors.

Our use of Large Language Modules (LLMs) is governed by Thomson Reuters' principles, frameworks, policies, and standards. We maintain governance policies and standards designed to minimize use of sensitive data in AI models, with escalated reviews by a Model Ethics Committee within Thomson Reuters that evaluates the use of sensitive data within an LLM. Thomson Reuters has also built an internal LLM and AI solution for internal utilization and is actively driving employees to use the internal application for product development.

2.1.3 Due Diligence

We conduct ongoing human rights due diligence in line with the UNGPs to identify and address actual and potential human rights impacts. This process is overseen by the Human Rights Steering Committee and assigned to relevant Business Units and other Enabling Functions. We are also committed to conducting a corporate-wide saliency assessment every three years.

2.1.4 Performance and Reporting

Our approach to human rights is one of integration, continuous learning, and improvement. We track the progress and effectiveness of our human rights strategy integration and continuously evaluate performance through the Human Rights Steering Committee. We share information about our human rights efforts in our Social Impact and ESG Report and in this Human Rights Policy. Our human rights efforts are also reflected in other policies and reporting, including in our Code of Business Conduct and Ethics, Supply Chain Ethical Code and Modern Slavery Act Statement

2.1.5 Stakeholder Engagement

Thomson Reuters is committed to ongoing engagement with stakeholders and potentially affected rightsholders and/or their legitimate representatives. This includes internal stakeholders (such as employees, journalists, and contractors) and external stakeholders (such as shareholders, customers, academics, and other civil society groups). We work in partnership with government and non-government agencies to raise awareness of human rights topics such as human trafficking and women in leadership. We also collaborate in dialogue and industry forums to advance human rights within our sphere of influence.

2.1.6 Grievances and Access to Remedy

Thomson Reuters values open communication, transparency, and accountability. We provide access to grievance mechanisms and encourage reporting of unethical or illegal conduct and potential violations of our Code of Business Conduct and Ethics. Questions and concerns can be submitted by anyone, including our employees, suppliers, suppliers' employees, and members of the public. Options for reporting grievances include company managers, Human Resources, company lawyers, the Enterprise Compliance team or the [Code of Business Conduct and Ethics Hotline](#). The Hotline allows anonymous submission and confidentiality will be maintained (to the fullest possible extent). Further information is available in the Code of Business Conduct and Ethics. Retaliation is strictly prohibited. In situations where Thomson Reuters is found to have caused or contributed to adverse human rights impacts, we will provide appropriate remedial action.

3 ROLES & RESPONSIBILITIES

<Addition to those outlined in the TR Global Policy>

Key Roles and Responsibilities	
Role	Responsibilities
<u>Policy Owner</u> Vice President for Government Affairs and ESG	Responsible for ensuring Policy documents are aligned with the principles outlined in this policy and the processes defined in the Policy Management Standard and Procedures. Responsible for developing a communication and implementation plan for the Policy document. Ensures that the policy document is reviewed at the stated frequency and that the right monitoring and compliance is in place.
<u>Approval Authority</u> Chief People Officer Chief Legal Officer/Corporate Secretary	Responsible for the review and approval of a Policy Document.
Risk & Compliance (R&C) function	While the Chief People Officer and Chief Legal Officer/Corporate Secretary have executive oversight and the Social Impact Institute owns this Policy, the Risk & Compliance function owns the Policy Governance Framework and is responsible for the governance of enterprise policies. The R&C function is consulted and informed by policy owners for the development, approval, publication, and retirement of policy documents. The R&C function is also responsible for the Policy Exception process.