

# Environmental, Social and Governance Report

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# Above All, We Do What's Right

We are committed to connecting the world's data safely and effectively, advancing innovation, and empowering people to do good, to create a better and more sustainable future for us all.



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**Scott Howe**  
Chief Executive Officer

## For our clients, partners, colleagues, and shareholders:

All business is personal. At a time when corporations are held more accountable for reflecting changes in societal values, the need for defined standards has now become table stakes. Corporate governance models around the world are maturing rapidly to strengthen trust and set rigorous benchmarks for others to follow.

First and foremost, we believe accountability starts with a clear understanding of what drives decisions at our company. In order to provide more transparency into our own operations, I am pleased to introduce our first ever Environmental, Social and Governance (“ESG”) Report. This report outlines a set of standards that reflect our commitment to social consciousness and offers others the ability to track our performance against these stated values.

Even though we are fundamentally an enterprise software business, relationships are the heart of everything we do. To help the larger ecosystem achieve sustainability over the long-term, we believe it’s essential to not only act in the best interest of others, but to show how our processes and procedures equip us to successfully navigate an increasingly complex landscape with both practical and ethical considerations in mind.

Our long-standing commitment to neutrality and performance continues to be top priority, and is essential. We believe this will help to remove friction and enable greater collaboration so more connections can be made without compromises, and so control stays where it belongs — with our clients, our partners and the people we all serve. We look forward to the moment when everyone who shares these values can thrive in our data-driven world.

A handwritten signature in black ink, appearing to read 'Scott Howe', written in a cursive style.

# About LiveRamp

As the leading data connectivity platform, LiveRamp enables companies and their partners to better connect, control, and activate data to transform customer experiences and generate more valuable business outcomes. LiveRamp's fully interoperable and neutral infrastructure delivers end-to-end addressability for the world's top brands, agencies, and publishers.

At LiveRamp, we believe connected data has the power to change the world. Making meaningful connections can transform humanity, and as a company, we do not sit apart from society. We believe that investing in our employees and the communities where we do business is foundational to building an exceptional corporate culture and driving long-term business success. Our number one company value is Above All, We Do What's Right, and this mindset extends across all areas of our business. We are committed to connecting the world's data safely and effectively, advancing innovation, and empowering people to do good and to create a better and more sustainable future for us all.



LiveRamp aspires to make it safe and easy for companies to use data effectively.



\$443M  
REVENUE



1,200  
EMPLOYEES



10  
COUNTRIES



825  
DIRECT CUSTOMERS

# Our Guiding Values

At LiveRamp, we believe in our own exceptionalism. We don't aspire to be mediocre, good, or even great—we work to be the absolute best in everything we do.

We hire exceptional people, challenge them to do exceptional things, and achieve exceptional results for our clients. We do this through our six guiding principles:

1

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## Above all, we do what's right.

We see the world through the lens of our customers and do what's best for them. We embrace debate in the search for truth. We prioritize long-term value over personal ambitions.

2

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## We love our customers.

Our customers are our reason for being. We seek to understand the world first through their eyes, recognizing that their success means our success. What does winning mean to our customers? What keeps them up at night? How can we help? These are the essential questions we are maniacally focused on solving.

3

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## We say what we mean, and do what we say.

We shoot straight and combine candor with kindness, and we hold ourselves accountable for setting and achieving big, scary goals.

4

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## We empower people.

We believe that people perform best when given power and freedom, and respect the judgment of those closest to the work. We trust our people to do the right thing and avoid unnecessary rules and bureaucracy.

5

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## We respect people and respect time.

We believe that exceptional results are achieved by exceptional people, and we believe that exceptional people possess high character in addition to high intellect—no tolerance for selfishness. We also respect time (both ours and our customers') by automating and optimizing wherever possible.

6

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## We get stuff done.

We prioritize progress over perfection. We give grace for errors of action, provided we learn and get better. We always surface our challenges.

# About This ESG Report

## We are pleased to introduce our inaugural Environmental, Social, and Governance (“ESG”) Report.

We strive for clarity and transparency in all of our communications and look forward to sharing additional future updates with our stakeholders. Disclosures in this report are informed by the Sustainability Accounting Standards Board (SASB) for the software and IT services industry covering business ethics; risk management; employee diversity, equity, and inclusion (DE&I); and integration of sustainability factors into our business. We look forward to obtaining feedback from our stakeholders and building on the initiatives outlined in this report as we continue to develop our practices and disclosures in the future.

**This report covers the 2021 fiscal year, spanning April 1, 2020 to March 31, 2021.** In some cases, we include data and information about programs and activities relevant to our key corporate sustainability areas of impact that occurred in the 2022 fiscal year, as noted.

Unless otherwise noted, the information in this report covers LiveRamp’s global operations.



# Our Customers





# Our Customers

At LiveRamp we believe that a culture of accountability is essential to succeed in a data-driven world; it is the path to driving business value long-term.

## Data Ethics and Security

Data governance is not just something we do—it is part of who we are and always has been.

As Acxiom in 1974, we appointed the industry's first-ever Chief Privacy Officer. Since then, we have continued to spearhead best practices and help set industry regulatory guidelines. LiveRamp executives are, in fact, frequent presenters at industry events on best-in-class privacy practices and consumer advocacy.

Our world-class data ethics program, led by our Chief Data Ethics Officer, strives to lead the business and our partners and customers with policies and guidelines that ensure we operate in compliance with jurisdictional laws, co-regulation developed with and by industry self-regulatory groups, and our own rigorous standards for ethical practices. We are committed to working diligently for the ethical use of data, which creates value for all stakeholders.

We believe that trust is the foundation of all relationships. To build the trust of those we serve, LiveRamp is committed to stewarding our data and our customers' data, putting consumer privacy

first, and protecting our data systems from external threats. Ensuring that we safeguard and protect the data we are entrusted with from misuse or unauthorized access, as well as protecting the privacy of those we deal with, is critical to our success.

We understand that protecting our customers' data is at the foundation of enabling our customers and partners to build exceptional experiences and relationships with their end customers. Led by our Chief Information Security Officer, we leverage our best-in-class security infrastructure and security program, which is designed to reduce risk in alignment with business goals by establishing and leading the execution of a comprehensive security strategy that includes:

- Developing, implementing, and enforcing the cybersecurity framework
- Informing and training employees on cybersecurity—LiveRamp provides extensive

Training and education to all employees, including executives, product development teams, sales staff, and client teams under our LiveRamp Global Privacy Education and Certification program, the completion of which is required of LiveRampers, worldwide, annually

- Monitoring and assessing security processes and systems
- Detecting and responding appropriately to security incidents
- Taking appropriate steps to prevent the occurrence or reoccurrence of any such incidents
- Integrating with Risk and Compliance stakeholders at the enterprise and division levels

## Training

All LiveRampers receive and are required to complete both data ethics and data security training as a new hire and annually each year of employment thereafter. Role-specific training is also given as needed to safely manage data and operations. We also comply with many frameworks that require training.

## Oversight

In addition to our CPO and CISO, LiveRamp has an Enterprise Risk Management program in place that assures executive and board oversight for data ethics, security, and internal audit.

## External Audits

In addition to internal audit, LiveRamp uses external audit firms and external certifications for several key areas including:

- Data ethics
- Security
  - SOC2 Type 2
  - ISO 27001 (EU)
  - HITRUST
  - 20+ client security assessments per year
  - Various risk assessments for LiveRamp
  - Third-party penetration testing

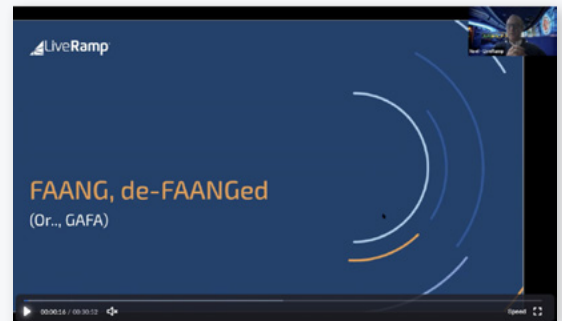
## Our Affiliations

LiveRamp delivers privacy-conscious solutions that honor the best practices of leading associations, including the Digital Advertising Alliance's (DAA's) ICON and AppChoices programs, the Interactive Advertising Bureau (IAB), the Data & Marketing Association (DMA), and the Advertising Research Foundation (ARF), NIST 800-53, ISO 27001, HIPAA.



Data Privacy is core to what we do, and do so well, so Data Privacy Day is celebrated at LiveRamp.

In 2020, a day was not enough for us, so we expanded the celebration to be Data Privacy Week! During the week, we hosted a series of fun and educational opportunities that ranged from webinars such as "Privacy in the Wild" and "FAANG, de-FAANGed" to a trivia night that was wildly popular.



# Our People



// We hire exceptional people and challenge them to accomplish exceptional things. //

LiveRamp employs more than 1,200 people worldwide, representing four generations and gifting our team and customers with dozens of relevant industry, technical, and linguistic backgrounds.

We believe that brilliance exists everywhere and accept applications for many roles from candidates from less-traditional backgrounds and locations—including those without formal higher education credentials. Rather than focus on “pedigree,” we are more interested in how people approach problems, how they team with others to reach goals, and how quickly they learn when presented with new information.

LiveRamp’s culture of empowerment is best reflected through the experiences of our people. In a May 2021 survey of our global workforce, for example, **an average of 9 of 10 LiveRampers shared:**

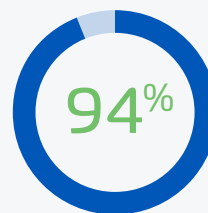
- I feel empowered to make decisions regarding my work.
- My manager encourages an environment where individual differences are valued.
- I am satisfied with my ability to choose when and where I work.

Put simply: we believe that people operate at their best when given clear goals—often with their input—and the tools, training, and teammates needed to chart a winning path to those goals.



1,200+  
PEOPLE EMPLOYED

Our people solve important problems and work collaboratively with our customers to power their success. All the while, **we are honored that**



of LiveRampers say it is a great place to work, compared to 59% of employees at a typical U.S.-based company.



## Attracting and Retaining Talent

We hire exceptional people and challenge them to accomplish exceptional things. We attract and retain employees with competitive compensation and benefit programs, learning and development opportunities that support career growth and advancement opportunities, and employee engagement initiatives that foster a strong, inclusive company culture.

Through our dedicated organizational development program, we assess our human capital opportunities and needs and focus on building the individual capabilities of our employees to facilitate achieving the overall goals of our organization. We aggregate and analyze critical human capital metrics, including employee retention, to monitor the success of our strategy and make adjustments accordingly to prevent attrition.

With a focus on diversity, inclusion, and belonging (which will be discussed more later in this report), we make sure to have inclusive hiring practices that support a diverse workforce. We require our U.S.-based recruiters, hiring managers, and interviewers to be trained on unconscious bias and inclusive interviewing, our recruiters to source from varied methods, and all positions to be posted in a variety of diversity-focused job boards. We also have recruiting partnerships with a variety of higher education institutions.

## Total rewards

Our compensation programs are designed to be market-competitive and internally equitable to attract, retain, motivate, and reward a high-performance workforce.

With our guiding principles of **we empower people** and **we respect people and respect time** in mind, we offer the following:

### Comprehensive Benefits

We know to get the best of our employees (LiveRampers), we need to take care of them, so 100% of our full-time employees and their eligible dependents receive a comprehensive benefits package that includes:

- Medical, dental, and vision health care plans
- Mental health support
- Fitness reimbursements (which, in 2020, LiveRampers were able to use for home fitness equipment)
- FSA medical and dependent care
- Group life insurance/AD&D/Company paid term life and AD&D insurance
- Voluntary term life and AD&D insurance
- Company provided short- and long-term disability plans
- Fully Paid Parental Leave

- Retirement savings plans – available to all LiveRampers, including part-time and interns
- Stock purchase – available to all LiveRampers, including part-time and interns
- Education reimbursement (U.S.)
- Back-up child and elder care (U.S.)

### Adjustable Work Schedule

LiveRampers come to work every day ready to make an impact. They have flexibility to work when they need, where they need, because we can trust they'll get stuff done.

### Flexible Paid Time Off

We believe work is just one part of life and studies show that regular time off promotes a healthier lifestyle and increases productivity, therefore, LiveRampers are not limited to a fixed number of vacation and personal paid days off. We encourage LiveRampers to take time off when they need to re-energize. Personal leaves of absence, parental leave, and military leaves are also extended to all LiveRampers.

### Remote Work Perks

Our all-inclusive RAMP Remote program offers a generous home-office stipend and ergonomic program to help LiveRampers do their best work from home.

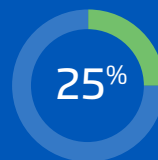
## Training, Development, and Engagement

LiveRamp offers both function-specific and function-agnostic development programs for our global workforce. Function-agnostic examples include our onRamp New Hire Experience and skills-based training programs, such as Feedback as Fuel. In addition, we have function-specific programs in place for our sales and engineering organizations and offer

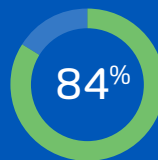
on-demand leadership and skills-based content via our global LiveRamp Learning Hub.

We at LiveRamp know that our culture comes from the top down, so we also have Leading at LiveRamp, which is LiveRamp's signature leadership development program, offered globally to all people managers within their first year as a manager at the company. In addition, we have an experiential development program for individual contributors designed to build cross-functional understanding of the business and exposure to senior leaders. In any given year—and in addition to our broader training portfolio—roughly 25% of LiveRampers participate in at least one of these leadership development programs.

We also know that to keep our people happy, they need to feel supported and heard. So 100% of LiveRampers have regular development reviews so they can continue to grow in their roles. LiveRamp also offers a biannual People Survey to all employees globally, and we are happy to report that our response rates are high (85-90%). Responses are anonymous, and we take the feedback very seriously so we can address any concerns that are raised.



25% of LiveRampers participate in at least one of these leadership development programs.



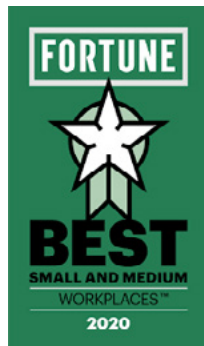
84% of LiveRampers also have regular check-ins with their managers so they can voice concerns and get feedback on a regular basis, according to our most recent survey data (May 2021).



## Recognition

Since 2016, LiveRamp has either qualified or certified as a Best Place to Work. In addition, LiveRamp was listed among the 100 Best Companies to Work for by *Fortune* every year since 2018, and was among the Top 10 Best Places to Work by Glassdoor in 2017.

In 2020, LiveRamp was also recognized on Great Place to Work's Best Workplaces for Parents, and in 2021, LiveRamp was recognized on *Fortune's* Best Workplaces in Technology and Best Workplaces in the Bay Area lists.



# Diversity, Inclusion, & Belonging





// At LiveRamp, every employee is a guardian of DIB. //

At LiveRamp, we believe there are three core pillars of diversity, inclusion, and belonging (or DIB): Workforce, Products & Customers, and Community. These pillars reflect the intricate relationship of diversity, inclusion, and belonging—both internally and externally. To be effective, we believe all three must work together harmoniously for an environment that is equal parts diverse, encouraging, and accepting. Creating a welcoming and inclusive workplace where colleagues feel a sense of belonging leads to better outcomes for our employees and business.

## Workforce

Diversity, inclusion, and belonging (“DIB”) efforts are a cornerstone of LiveRamp’s innovative culture. We believe that individuals do their best when they not only bring their full selves to work, but feel as though they truly belong. By ensuring we maintain an emphasis on creating a work environment where all are welcome and can thrive, we’ll catalyze our progress toward being an exceptional company and building an equitable future for all.

During 2020, we hired our first-ever Head of Diversity Strategy & Programs; we published LiveRamp’s Diversity, Inclusion, & Belonging (DIB) Charter, which set our commitment to and the core pillars of DIB; and we talked about our current programs and practices as well as showed the breath of leaders making DIB part of their focus. The DIB practices are embedded into the operating model of the company itself.



### WORKFORCE

Ensure that we are a place where all can thrive—with focus on those from underrepresented backgrounds



### PRODUCTS & CUSTOMERS

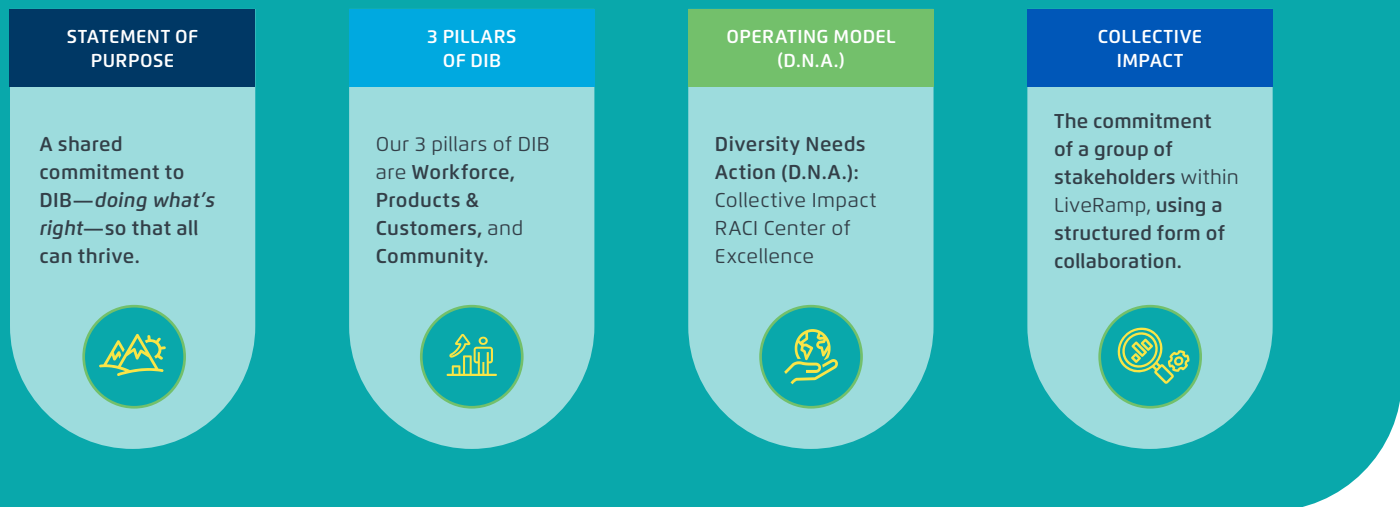
Design our products and related assets—events, collateral—for accessibility and inclusivity



### COMMUNITY

Enable people to use their time, talent, and treasure to benefit the external places we live and work

LiveRamp aims to achieve and support a more diverse workforce through this DIB journey.



Our board of directors is also working with the leadership team through the development and evaluation of concrete, strategic action plans to prioritize and drive accountability around diversity and inclusion. We also plan to publicly share what is working (and what is not) by publishing a LiveRamp Annual DIB Report.

Our CEO also joined 1,000 CEOs of the world's leading companies and organizations to sign the **CEO Action for Diversity & Inclusion™** pledge, the largest CEO-driven business commitment to advance diversity and inclusion in the workplace. The pledge outlines a specific set of actions signatory CEOs will take to cultivate a trusting environment where all ideas are welcome and where employees feel comfortable and empowered to have discussions about diversity and inclusion. At LiveRamp, we feel we are already embracing the four core actions that members of the pledge must commit to uphold, which are:

- Continue to cultivate a workplace that supports open dialogue on complex—and sometimes difficult—conversations about diversity and inclusion
- Implement and expand unconscious bias education

- Share best—and unsuccessful—practices internally and externally
- Create and share strategic inclusion and diversity plans with our board of directors

We seek out brilliant people from all backgrounds. Our recruiting efforts seek candidates who add to our culture in useful ways rather than simply hiring for “cultural fit.” We have a growing ecosystem of employee resource groups (ERGs)—voluntary, employee-led groups that foster a workplace where employees of all identities can experience belonging. We provide training and education that helps promote our DIB expectations. Overall, our vision is that every talent program and benefit for LiveRamp employees recognizes and reinforces the value of inclusion, divergent thinking, and creative perspectives, aspiring to create equitable systems for all LiveRampers to thrive. We also make sure that our efforts are working via LiveRamp's biannual People Survey and regular DIB focus groups.

- **Employee resource groups:** We have a growing ecosystem of employee resource groups (ERGs)—voluntary, employee-led groups that foster a workplace where employees of all identities have the potential to experience belonging.

ERGs receive dedicated funding and offer personal and professional development opportunities, executive sponsorship, and a global lens.

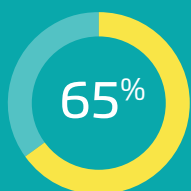
- Currently, we have seven ERGs: EQUAL, LatinX@LiveRamp, Veterans@LiveRamp, Women@LiveRamp, RAMPability, Black@LiveRamp, AAPI@LiveRamp, and MOSAIC
- 65% of all LiveRampers globally participate in one or more ERGs
- Each ERG has an executive sponsor who works in service of the group's goals and mentors each ERG's leadership team
- Some programs of note that were spearheaded by our ERGs include:
  - Black@LiveRamp's Back-to-School Drive donated over \$10,000 worth of books, headphones for remote learning, and supplies to schools in Oakland, Philadelphia, and New York City
  - Veterans@LiveRamp's production of inclusive media highlighted diversity in the military in a tribute to Veterans Day
  - Webinars were hosted to destigmatize mental health in the workplace

- All ERGs collaborated to orchestrate a successful "12 Days of Giving" holiday campaign, raising over \$26,000 for organizations including Feeding America, the Hidden Genius Project, the Trevor Project, the Young Center for Immigrants Children's Rights, Fountain House, Toys for Tots, the Women's Building, World Central Kitchen, UNICEF (the United Nations Children's Fund), California Community Foundation Wildfire Relief Fund, Pure Heart Foundation, and St. Jude Children's Research Hospital

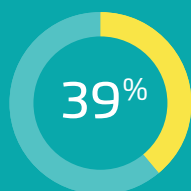
- **Training and education:** U.S. LiveRampers are required to complete unconscious bias and diversity awareness training annually. As a firm, we have active participation of senior leaders and provide financial sponsorship for events like SF Pride, and we encourage attendance and involvement in events that support diversity, such as the Anita Borg Institute and Watermark. We also provide development opportunities for underrepresented LiveRampers.

## Our FY21 efforts are starting to produce results.

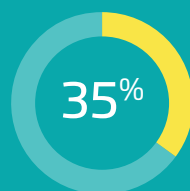
Even amid progress, we remain humble and focused on further moving the needle.



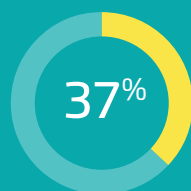
Of LiveRampers are engaged in ERG's informing and advancing our efforts.



Of LiveRampers' global workforce identify as female.



Of our U.S. team identify with underrepresented racial backgrounds.



Of global people leaders identify as female.



Of U.S.-based people leaders identify with underrepresented racial backgrounds.



Approximate increase, each in Black and Latinx representation over the last year (U.S. workforce).



## Pay Equity

We at LiveRamp are proud to share that we take pay equity very seriously. LiveRamp is committed to the principle of equal pay for equal work and seeks to ensure that our employees are paid equitably. Pay equity is reviewed when an employee is hired or promoted and is part of our annual pay review process. It is determined according to business unit, role, geography, years of industry-related experience, performance, and tenure. Where a discrepancy might be identified, we address it *every time*. LiveRamp uses a third party to conduct an annual review of our pay levels across similar job families, levels, and locations. We continue to enhance our internal processes and metrics to proactively address pay discrepancies and educate our managers on how to ensure pay decisions are free from bias. We also implemented internal governance controls to review pay decisions quarterly to ensure consistent and equitable treatment across all functions and locations.

## Product and Customers

We have read and we affirm studies revealing that inclusive workplaces produce better business outcomes. DIB is woven into LiveRamp's product offering, including our identity-based solutions, by rethinking exclusionary terminology associated

with products, making products accessible to all, and enforcing policies to prohibit clients from using services to discriminate once the product is presented outside of the organization. We also strive to contribute to our industry-wide impact by elevating the voices and presence of underrepresented leaders at LiveRamp-sponsored events, and through sharing our successes and not-so-successful efforts in our Annual DIB Report. We also strive to accelerate the impact of social sector organizations through our **Data for Good** and **Partners for Good** programs.

- **Data for Good:** In addition to powering better customer experiences, we believe that data, when harnessed for good, can be used to solve some of society's biggest challenges and shape our world for the better. As part of the Data for Good program we launched in 2019, we partner, on a pro-bono basis, with companies who leverage Data for social good. We've partnered with the Truth Initiative to help fight the opioid epidemic as well as with a variety of telehealth platforms to help better serve individuals during the COVID-19 crisis. OneUnited Bank, the largest Black-owned bank in the U.S., is the latest partner to join our Data for Good initiative, with plans to leverage LiveRamp technology to better address the financial literacy gap within the Black community.

// Our vision is to use technology to teach and inspire the Black community to build net worth. Our partnership with LiveRamp brings us closer to truly understanding the financial needs of Black Americans and providing our community with the critical tools necessary to build net worth.” Kevin Cohee, Chairman and CEO of OneUnited Bank

- **Partners for Good:** Connections have the power to change the world. We strive to make meaningful connections with partners and customers to unleash a wave of innovation and amplify awareness for a variety of causes. Our voice and position at the intersection of brands, technology, data, TV, and publisher partners allows for greater visibility of their philanthropic efforts.



>15

PARTNERS  
ENGAGED



>5

DIVERSE PHILANTHROPIC  
CATEGORIES (SOCIAL JUSTICE,  
HEALTH, ECONOMIC, ETC.)



>5

INTERNATIONAL  
ORGANIZATIONS  
PARTICIPATING

## Community

LiveRamp is focused on data-centric initiatives with the power to positively impact underserved communities, as we believe DIB extends beyond the workplace. With that in mind, we have several programs to support the interests of LiveRampers and activate their passion, talent, and time to make impactful change in our communities, including LiveRamp Cares, LiveRamp.org, and our Annual Day of Service.

- **LiveRamp Cares:** The LiveRamp Cares program was founded in 2016 with the mandate of giving back to the communities where we live and do business. Through this program, LiveRamp will match employee donations to charitable organizations that meet established eligibility criteria.
- **LiveRamp.org:** LiveRamp.org mobilizes our people, products, and ecosystem to take action for the good of humanity. By leveraging the time, talent, and treasure across our company and ecosystem, we can build better connections for a better future. By donating our technology, investing in our employees and the causes that matter most to them, raising the profiles of our clients and partners, and supporting data-centric initiatives with the power to positively impact underserved communities, we believe we can collectively create a better world for everyone.
- **Annual Day of Service:** Although LiveRampers are encouraged to take time off to volunteer to help the causes that they support, we also have an Annual Day of Service, in which LiveRampers across the world have the opportunity to participate in spending the day in service to their communities.

At LiveRamp, our commitment to advance equity and inclusion in the communities around us goes much further. We put our money where our mouth is, and in February 2021, we announced we had banked **\$15 million in cash reserves to financial institutions supporting historically underserved communities**. The lack of access to financial resources and services negatively impacts a continuously widening wealth gap in the U.S., which disproportionately affects minority and Black communities. LiveRamp is in a fortunate position to be able to prioritize a more diverse approach to its banking relationships as part of its larger efforts around diversity, inclusion, and belonging. Striving for positive change at scale, LiveRamp is proud to partner with OneUnited Bank and Southern Bancorp and leverage the power of data to deliver better economic and social outcomes for all. And this is not just a one-time investment, as we updated our Corporate Cash Investment Policy to include a provision for investments in minority-controlled institutions going forward.

LiveRamp’s commitment to community goes even one step further. We also want to inspire the next generation of technology leaders by striving to collaborate with organizations that are focused on tackling diversity gaps in technology by providing exposure and resources to enhance students’ technical skills and by promoting internships and full-time placements.



250

Individual volunteers throughout FY '21



100%

Success rate in matching teams to volunteer endeavors through on-demand programs



Company-wide

day of service to bring us all together



# Environmental Sustainability



## Vision and Commitment

As a global company, we are driven by a shared commitment to do our part to make the world a better place. In service to this commitment to compliance, conservation, communication, and continuous improvement, we strive to ensure that our sustainability efforts are integrated into key decision-making processes and business operations. In accordance with our commitments to environmental protection and stewardship, LiveRamp strives to:

- Implement environmentally sound policies designed to reduce our impact on the environment and our communities
- Promote the efficient use of natural resources, including energy and water, and minimize our emissions, including greenhouse gas emissions and waste
- Manage operations to meet or exceed applicable environmental regulations
- Engage with our customers, suppliers, communities, and other relevant stakeholders on our environmental impacts and opportunities
- Continually seek ways to further improve our environmental performance while supporting production quality and efficiency

As part of our commitment to the environment, LiveRamp seeks to monitor and report environmental data relevant to our operations, such as energy use, emissions, and other relevant data. LiveRamp is committed to transparency regarding our environmental sustainability through public disclosures on our website.



Currently, our sustainability efforts span several areas. When acquiring and building out real estate, we prioritize green buildings that are centrally located and commuter-friendly and incorporate sustainable elements throughout all aspects of the design and construction process. Other initiatives at LiveRamp include recycling and composting programs in all of our global offices, energy and resource conservation programs, and public transportation support programs. Additionally, we recently transitioned the vast majority of our data hosting to the cloud, significantly reducing our physical data center footprint.

Finally, with our recent acquisition of DataFleets, our technology is pioneering federated learning and distributed data collaboration use cases for our industry. These advanced privacy-preserving techniques allow for distributed data sets to be connected and analyzed without requiring underlying data to move or be consolidated, thus reducing data storage requirements and energy consumption and making a positive impact on carbon emissions.



# How We Operate



## Board and Management ESG Oversight

LiveRamp has a steadfast commitment to maintaining the highest standards of business and professional conduct and compliance. A consistent effort to uphold strong values and make the right choices in how we conduct business is critical to earning the trust of our customers and other stakeholders.

LiveRamp is governed by a ten-member board of directors led by a non-executive chair and a majority of independent directors. The board believes that its structure and composition of highly experienced and engaged independent directors provides effective oversight of the company's management.

The board has an active role in the company's overall strategies. The board conducts an annual review of the company's corporate governance practices and regularly reviews the data privacy and security and human capital strategies. Furthermore, the board is responsible for overall risk oversight of the company. The Audit/Finance Committee reviews quarterly the company's policies with respect to data ethics, IT security, and cybersecurity. The Governance/Nominating Committee, at least semi-annually, reviews and reports to the full board with regard to ESG matters of corporate responsibility and sustainability, including potential long- and short-term trends and impacts to the company's business.

The company's management team, subject to oversight by the board, structures, monitors, and adjusts our policies on data privacy, data security, and human capital. Each year, senior management reviews our long-range business plans. These plans consider long-term sustainability implications



and the ability to meet customer needs related to sustainability issues.

At an operating level, the following senior managers have ultimate responsibility for critical areas of our sustainability initiatives:

- Governance and Ethics: Chief Ethics and Legal Officer
- Data Security: Chief Information Security Officer
- Data Privacy: General Counsel and Global Chief Data Ethics Officer
- Human Capital: Chief People and Culture Officer
- Community: Chief Communications Officer

All of these positions report directly to the CEO.

## Ethics and Compliance

LiveRamp's commitment to doing the right things for the right reasons remains constant. It is the cornerstone of our company's success, as LiveRamp is an organization with strong values of responsibility and integrity. Our [Business Codes of Ethics](#), which are posted on the LiveRamp website and can be found in the Employee Handbook—



which each LiveRamp receives when joining—contains guidelines for conducting business with the highest standards of ethics. LiveRampers are expected to become familiar with these policies, sign off on them annually, and use them as a road map when they are unsure which decision or action is appropriate. These policies, combined with LiveRamp’s core values and guidance from LiveRamp leaders and Human Resources employees, help LiveRampers find the right course.

Our Chief Ethics and Legal Officer has managerial responsibility for our anti-corruption and business ethics programs. We maintain established programs to assess and address risk areas for corruption, such as conflicts of interest and bribery. We also set out our principles for the protection of human rights, including anti-discrimination and anti-harassment, diversity, and health and safety.

### Whistleblower Program

LiveRamp is committed to an environment where open, honest communications are the expectation, not the exception. Open communication is a hallmark of the LiveRamp culture, so anyone who suspects unethical or inappropriate behavior is encouraged to use internal reporting channels

or our independent Ethics Hotline without fear of retaliation. As detailed in our Code, confidential reports can be made directly to our HR department or legal department, or through our anonymous, third-party–operated reporting service, which is available 24 hours a day, seven days a week, 365 days a year. Reports are automatically directed to the CLO and chair of the Audit Committee of the board. Employees, contractors, suppliers, and community members can submit a report online or call toll-free from anywhere in the world.

Suspected violations of our Code of Business Conduct and Ethics or company policies are brought to the attention of our Chief Ethics and Legal Officer (or the Chief Financial Officer if the complaint is related to financial, accounting, or auditing matters). All allegations are investigated and tracked until resolved, and appropriate action is taken based on the findings. Material issues involving a violation of regulation, law, or the Code are reported to the board’s Audit Committee. The Chief Ethics and Legal Officer provides annual compliance updates to the Board of Directors and interim reports to the Audit Committee throughout the year.

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