



**Environment, Social  
and Governance Strategy**  
2024

# Our ESG vision



International education is evolving, and our environment is constantly changing. At INTO, our mission is to bridge world-class universities with exceptional global talent, aiming to transform students' academic success in an ethical manner while actively promoting environmental and social justice.

We are devoted to fostering meaningful partnerships between universities and international students, ensuring that education is accessible to all while upholding the highest ethical standards and advancing sustainability. Our commitment lies in creating a supportive and inclusive environment that fosters academic growth, cultural understanding, and social responsibility.

At INTO, conducting business responsibly, honestly, and with integrity is integral to our approach, now including our unwavering dedication to sustainability. We aspire to improve across environmental, social, and governance aspects, consistently striving for positive outcomes for INTO, our students, partners, and employees.

A key part of our culture is our belief in operating with transparency and we are committed to providing clear and open communication about our ESG practices, progress, and challenges. Transparency is essential in building trust with our stakeholders, including students, universities, and employees. We strive to share relevant information openly, ensuring that our stakeholders are well-informed about our ESG initiatives, achievements, and areas for improvement.

A handwritten signature in black ink that reads "John Sykes." The signature is fluid and cursive.

**John Sykes, CEO & Co-Founder**

# Our ESG strategy

As we continue to navigate the dynamic landscape of international education, INTO's commitment to sustainability and ethical practices remains unwavering. Building on the foundation set forth by our CEO, John Sykes, we are pleased to present an overview of our approach to Environmental, Social, and Governance (ESG) initiatives. Our strategy is designed to reflect our dedication to fostering academic success, promoting social justice, and advancing environmental stewardship.

- › INTO has developed a clear and comprehensive ESG strategy to deliver on its vision with a focus on both shorter-term actions (that align to normal business planning cycles) alongside long-term aspirations (to set a clear goal)
- › INTO is focused both on improving its own ESG activities but also supporting our customers in meeting their own goals (for example reducing travel needs for Universities and Students alike by provision of University Access Centres, Return & Connect and our exploratory activities to enable TransNational Education)
- › INTO is committed to allocating dedicated funds to support ESG activities supported by a passionate internal Employee Action Group who provide voluntary support to turn ideas into actions
- › INTO will start to voluntarily report annually on our ESG progress alongside existing reporting requirements

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# Our five ESG goals

Broadening the reach of higher education to drive positive social change is intrinsic to the work we do at INTO. Our ESG framework formalizes many of the ambitions that are core to our mission and strengthens our efforts with additional focus areas and clear commitments.

Our ESG framework was borne out of an in-depth consultative process. We have designed our pillars to address the issues that are most important to our stakeholders and that we believe are where we can have the most influence to impact. While our framework focuses on the commitments that we aim to achieve as an organization, it will also guide the work we do to support our partner universities in meeting their own ESG goals.



## 1. Climate resilience

Minimise our consumption of non-renewable energy and improve energy efficiency, maximise our opportunity to promote best practice in combating climate change and support climate-conscious travel of our staff.



## 2. Health and wellbeing

Optimise our internal environments and improve resources to support the health and wellbeing of our students, employees and guests.



### 3. Inclusivity and community

Foster an inclusive and thriving community by promoting social value, social mobility, diversity and inclusion, and providing equitable treatment and opportunities for employees.



### 4. Sustainable technology and innovation

Support technological innovation to improve our sustainability agenda with improvements to data collection, strengthening our operational delivery, our global partnerships and networks and driving positive change within our organisation.



### 5. Governance and compliance

To help meet our ESG ambitions in a manner that goes beyond legal compliance and maintains our core values of the business



# 1. Climate resilience

We are a truly global organization; we recruit students from 180 countries, run 35 regional offices and eight University Access Centres around the world as well as manage campuses in the UK, US and Australia. Given the scale of our work, it is imperative that we reduce the emissions we contribute and become more climate resilient, so that international education continues to benefit societies around the world.

Like many organizations, we have set ambitious long-term climate reduction commitments in line with the Paris Agreement and our stakeholder priorities. In addition, we have a three-year plan aligned with our budget cycle that sets out targets to move towards a lower carbon business model.

We are at the beginning of our roadmap to achieving climate resilience. Reducing travel associated with our business while encouraging young people to move overseas for a more rewarding education is a significant challenge for our

## Measuring progress

Objective	Metric	Baseline (2024)	Next Target (2026)	Long-term (2040)
<b>Reducing our Building emission rates</b>	Weighted Average Building Emissions rate (KgCO2/m2 per year)	41 (UK Assets)	5% reduction Expand to include non-UK Assets	25% sustainable reduction to 2024 without offsetting
<b>Reducing scope 3 emissions</b>	Scope 3 Emissions	No data	Define a realistic goal	25% sustainable reduction to 2024 without offsetting
<b>Procuring 100% renewable electricity for all controlled assets</b>	% Renewable Electricity of all buildings INTO (Staff & students) occupy	No data	Develop a baseline across Global Assets	100% Renewable Electricity use
<b>Improving &amp; Reporting energy usage</b>	Average Energy certificate of all buildings INTO (staff & students) occupy	EPC in place for all UK Assets	EPC or equivalent for non-UK Assets	100% reporting
<b>Improving waste management of controlled assets</b>	% of UK & US Centre waste going to Landfill	No data	Develop a baseline across Global Assets	0% to landfill
<b>Improving &amp; Reporting internal business travel</b>	Carbon & Carbon Equivalent Emissions (Travel)	No data (< 10% of travel booked via CWT)	Develop a baseline on >80% company travel	25% sustainable reduction per person to 2024 without offsetting

organization. An immediate priority is to collect data on the emissions associated with global travel for our students and staff, which will help us understand opportunities to minimize carbon-intensive journeys. We are also exploring the most impactful ways to reduce emissions at our own centers and facilities.

# 38%

**OF GEN Z INTERNATIONAL STUDENTS CONSIDER CLIMATE CHANGE IN THEIR DECISION MAKING**

Source: INTO #GenZ: Impact of Pandemic on Outlook on Life and Study survey 2021

## Delivering Change - 2024 Activities

Objective	Policies in place	Actions delivered	Company Projects	Employee Action Group projects
<b>Reducing our Building emission rates</b>			Developing a global asset database with clear owners and reporting for each	
<b>Reducing scope 3 emissions</b>		University Access Centres Return & Connect	TNE exploration	
<b>Procuring 100% renewable electricity for all controlled assets</b>			Data Gathering	
<b>Improving &amp; Reporting energy usage</b>			Data Gathering	
<b>Improving waste management of controlled assets</b>			Data Gathering	
<b>Improving &amp; Reporting internal business travel</b>		Cycle to Work scheme (UK) Electric vehicle purchase scheme (UK)	Centralising travel booking and reporting	Awareness campaign



## 2. Health and wellbeing

We set out to change the lives of students. As part of our purpose, doing what is best for every student is inherent in the decisions we make. Although ultimate responsibility for students' welfare lies with their universities, we believe that we can provide a strong network and entry route for getting additional wellbeing help when needed.

Many of our students are under the age of 18 and living away from home for the first time. Parents need to trust that we provide the best foundation for education and appropriate level of care. It is important that we welcome students into an environment that supports their health and wellbeing.

We need to be proactive in identifying and addressing the factors that impact our students' health and wellbeing. At the same time, we must support our staff to deal with complex emotional and physical health issues.

### Measuring progress

Objective	Metric	Baseline (2024)	Next Target (2026)	Long-term (2040)
<b>Investing in projects to improve the health and well-being of employees</b>	Net Promoter Score: Employee health & wellbeing is a priority at INTO University Partnerships)	Net Promoter Score: Employee health & wellbeing is a priority at INTO University Partnerships	10% improvement	Top 10% Peakon performance for our Industry
<b>Improving mental health of employees</b>	Net Promoter Score: INTO University Partnerships really cares about my mental wellbeing	Being asked as a core annual question	10% improvement	Top 10% Peakon performance for our Industry
<b>Improving mental health of students "under our roof" (PW students)</b>	Net Promoter Score: INTO University Partnerships really cares about my mental wellbeing (student survey)	Being asked in Annual Student Survey annually	10% improvement	Top 10% performance for our Industry



To understand the emerging challenges people face, we run regular surveys and gather input from our dedicated student services teams on the issues they hear about from students. With this greater level of understanding, we are putting steps in place that make a tangible impact on people's wellbeing.

# 92%

## STUDENT SATISFACTION WITH PERSONAL WELFARE AND WELLBEING SUPPORT

Source: INTO UK Annual Student Experience Survey 2024

### Delivering Change - 2024 Activities

Objective	Policies in place	Actions delivered	Company Projects	Employee Action Group projects
<b>Investing in projects to improve the health and well-being of employees</b>	IUP Policy Handbook	Benenden Health Roll-out  Ethical pension options offered to staff (UK)  Employee Assistance Programme (global), including access to structured counselling		
<b>Improving mental health of employees</b>	IUP Policy Handbook	Speak up policy  Mental Health Awareness week Annually  Mental Health First Aiders  Annual & Monthly Shine Awards Annually  Mental Health and Wellbeing workshops, incl. understanding and managing stress, anxiety, depression		
<b>Improving mental health of students "under our roof" (PW students)</b>	Suicide prevention policy Extenuating circumstances policy Wellbeing and fitness to study policy Mental Health Strategy Student engagement policy	Mental health strategy for UK Centres  Ensligh 24/7 Student care line	Curriculum review in progress to include integration of welfare/mental health  Support service blueprinting  Student Welfare Management system	



### 3. Inclusion and community

We operate in 30 countries and represent students and staff from all over the world. Respecting local cultures and celebrating diversity is fundamental to our business, but we want to constantly improve the inclusivity of our workplace and centers. As a driver of successful international education, we also see an opportunity to use our position to promote social mobility around the world.

Bringing cultures together is part of our mission to enrich education for both local and overseas students. Through our centers, we are working to create diverse and inclusive places for people from around the world to connect. As an employer, it is our ambition to create the same community in the workplace.

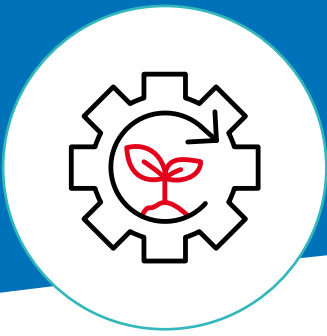
#### Measuring progress

Objective	Metric	Baseline (2024)	Next Target (2026)	Long-term (2040)
<b>Contributing to our local community through social value initiatives</b>	Money raised and delivered to local Charities across all of INTO	Creating a central oversight and monitoring ability	Creating a central oversight and monitoring ability	>1% of Revenues contributed annually
<b>Establishing social mobility for students without the means or networks</b>	TBD measure of number of students affected	TBD	TBD	TBD
<b>Promoting &amp; Embracing a diverse and inclusive environment at INTO</b>	Peakon question: I'm satisfied with INTO's efforts to support diversity and inclusion	21 (Peakon Aug23)	10% better	Top 10% Peakon performance for our Industry
<b>Improving the work place culture</b>	Peakon question: Working here, I feel that I can live a physically healthy lifestyle	Asking in Apr 24 Peakon to get baseline	10% better	Top 10% Peakon performance for our Industry

Our employees' priorities drive our inclusion efforts. To create the supportive environment that our people value, we have incorporated mentoring and coaching into our career and progression programs. Through employee action groups, we also empower our people to share their individual experiences and drive the social values that are important to them. Off the back of these forums, we have established a charity, INTO Giving, which raises funds for grassroots charities that improve opportunities for socially deprived communities.

## Delivering Change - 2024 Activities

Objective	Policies in place	Actions delivered	Company Projects	Employee Action Group projects
<b>Contributing to our local community through social value initiatives</b>			INTO Giving set for re-focus and leadership from company employees	Promotion of volunteering days (2 available to all employees)
<b>Establishing social mobility for students without the means or networks</b>				Establishing where can we help in our ecosystem of international students and how
<b>Promoting &amp; Embracing a diverse and inclusive environment at INTO</b>	Religious beliefs policy Menstruation and menopause policy Adoption leave policy, partner leave policy	Diversity, Equity, Inclusion and Belonging Working Group Employee Action Groups Full calendar of diversity awareness and cultural celebrations Pronouns in signatures Anti-racism Awareness elearning (2022) Upskilling learning pathways on Allyship, Diversity, Equity, Inclusions and Belonging, Neurodiversity and Inclusion for Disability		
<b>Improving the work place culture</b>	IUP Policy Handbook	INTO Mentoring Programme People Manager Development Programme (built on themes of building relationships, emotional intelligence, compassionate candor) Workshops on career development, building relationships and internal networking 1:1 and Group Coaching		



## 4. Sustainable technology and innovation

Our organization was established to offer an innovative way of helping students around the world access a more enriching higher education. Innovation remains a core principle of our business and a driver of our ESG ambitions today.

By embracing technology, we believe we can deepen the positive impact we create for our students, staff and communities around the world. Many novel technologies have the potential to radically transform the way education is delivered, but not always for the better. Therefore, it is critical to our business that we adopt and design technology that will help us in achieving our goals.

To that end, we are actively innovating technology that will enhance the education experience we deliver, create more joined-up and inclusive processes, and help us reduce our environmental impact.

### Measuring progress

Objective	Metric	Baseline (2024)	Next Target (2026)	Long-term (2040)
<b>Collaborating with Stakeholders on ESG standard implementation</b>	% of INTO JV Partner universities signed up to our ESG standard or higher	0%	20%	100%
<b>Expanding Sustainability and Environmental-Focused education products</b>	% of courses offered which are focused on Sustainability and Envi	TBD establishing the baseline	5% more courses	TBD
<b>Improving digital participation for INTO employees and students</b>	Net Promoter Score: INTO University Partnerships provides relevant and effective digital solutions for me to operate effectively	Asking in Jul 24 Peakon to get baseline	10% better	Top 10% Peakon performance for our Industry
<b>Seeking innovative ways of working digitally</b>	Net Promoter Score: INTO University Partnerships actively seeks out new and innovative ways to help me work more effectively	Asking in Feb 25 Peakon to get baseline	10% better	Top 10% Peakon performance for our Industry

Constant learning underpins our approach to sustainable technology and innovation. By enhancing the way we collect data, we will better understand threats, the staff and student experience, and our performance against KPIs, so that we can uncover more opportunities to improve.

## Delivering Change - 2024 Activities

Objective	Policies in place	Actions delivered	Company Projects	Employee Action Group projects
<b>Collaborating with Stakeholders on ESG standard implementation</b>		ESG as a key part of all University Tender submissions		
<b>Expanding Sustainability and Environmental-Focused education products</b>		Established UK Edco & US Edco course offerings		Mapping out current course offerings to identify gaps to address
<b>Improving digital participation for INTO employees and students</b>		LinkedIn learning available to all staff Microsoft 365 Learning Pathways available to all staff		
<b>Seeking innovative ways of working digitally</b>		Viva & OKR roll-out alongside Quarterly planning		



## 5. Governance and compliance (1 of 2)

ESG matters can influence where people choose to study and work, and the organizations that universities will partner with. Effective governance ensures that we are accountable to addressing our stakeholders’ priorities and maintaining the core values of our business.

As an OfS regulated organization, we are held to the same ESG standards as UK universities. As such, we have a Board of directors and non-executive directors who take overall responsibility for ESG matters and achieving our commitments. We also produce an annual sustainability report. Yet it is our goal to push our ESG ambitions beyond legal compliance and to meet ISO 14001.

### Measuring progress

Objective	Metric	Baseline (2024)	Next Target (2026)	Long-term (2040)
<b>Monitoring and managing cybersecurity across INTO's activities</b>	# of confirmed Breaches of our systems across INTO	0 (Since Jan 20)	Maintain at 0	Maintain at 0
<b>Monitoring and managing data protection across INTO's activities</b>	# of Data Compliance breaches at INTO / Quarter	4 (Q2 23)	0	0
<b>Sustaining Human Rights Policy across INTO's activities</b>	Up to date Human Rights policy implemented across INTO	In place	Maintain	Maintain
<b>Pushing suppliers to adhere to INTO Human Rights Policy</b>	% of JV partners & agents signed up to Human Rights policies	None	20% of JV & 10% of Agents	100% of JV & 80% of Agents

By producing a quarterly ESG report, we provide greater visibility of our progress against our targets and give our stakeholders more opportunities to feed back. Through data collection and reporting, we can track our progress in more detail and find opportunities to accelerate our ambitions.

Our policies also increase transparency and support our collaboration with universities. Through developing and agreeing policies, we hold ourselves and our partner universities accountable to delivering on our shared values.

## Delivering Change - 2024 Activities

Objective	Policies in place	Actions delivered	Company Projects	Employee Action Group projects
<b>Monitoring and managing cybersecurity across INTO's activities</b>	Annual anti-phishing training for all staff Regular quarterly Phishing email checks with Staff			
<b>Monitoring and managing data protection across INTO's activities</b>	UK GDPR - Best endeavours compliance China Data laws - Filings made to Government US State specific laws - Best endeavours compliance	Vietnam privacy laws compliance Implementing and living the plans made to Chinese Government Australia privacy law enhancement compliance		
<b>Sustaining Human Rights Policy across INTO's activities</b>	Sexual harassment and misconduct policy Child protection (previously referred to as "Safeguarding and Prevent") policy Freedom of speech and accompanying principles policy Modern Slavery policy INTO employee mandatory training on Anti-bribery, Anti-money laundering, anti-tax evasion and Modern Slavery	JV centre employee mandatory training on Anti-bribery, Anti-money laundering, anti-tax evasion and Modern Slavery		
<b>Pushing suppliers to adhere to INTO Human Rights Policy</b>	n/a	JV Centre sign-up at board to adhere to INTO policies	Agent code of conduct (similar to Kaplan and Study Group) to make reference to Human Rights  Signed up to BUILA agent code of conduct	

## 5. Governance and compliance (2 of 2)



### Measuring progress

Objective	Metric	Baseline (2024)	Next Target (2026)	Long-term (2040)
<b>Increasing green lease clauses in all new tenders and subsequent leases</b>	% of tenders and leases with Green Clauses	None	5%	80%
<b>Delivering ESG quarterly reporting</b>	ESG Quarterly report	None	Quarterly	Monthly
<b>Sustainable and Ethical Procurement</b>	Level of Flexible Framework	None	Policy defined and used in new contracts	In place for ALL contracts
<b>Writing an annual sustainability report aligned with Global Reporting Initiative (GRI)</b>	Annual Sustainability Report	None	Annual	Quarterly
<b>Implementing ISO 140001 environmental management system</b>	Maintaining ISO140001 compliance	Not in place	In Place	In Place
<b>Developing an EPC Strategy with asset register for UK portfolio to meet UK regulations</b>	Asset Register for UK Portfolio	Not in place	In Place	In Place



## Delivering Change - 2024 Activities

Objective	Policies in place	Actions delivered	Company Projects	Employee Action Group projects
<b>Increasing green lease clauses in all new tenders and subsequent leases</b>	n/a			
<b>Delivering ESG quarterly reporting</b>	n/a		Environmental Information Regulations 2004 (as requirement of oFS FOIA requirements)	
<b>Sustainable and Ethical Procurement</b>	n/a		Establishing an understanding of the scope of requirements	
<b>Writing an annual sustainability report aligned with Global Reporting Initiative (GRI)</b>	n/a			
<b>Implementing ISO 140001 environmental management system</b>	n/a		Establishing an understanding of the scope of requirements	
<b>Developing an EPC Strategy with asset register for UK portfolio to meet UK regulations</b>	n/a			

# Our ESG ambitions for 2024 and beyond

We are at the beginning of our ESG strategy. In 2023, we have focused on setting the foundations for our continued improvement. Our work has involved collecting data, establishing baselines and targets, putting policies in place, improving technology, and upskilling our employees.

Through 2024, we have set a plan to strengthen this groundwork and begin working towards our targets. These priorities are tied to a three-year plan in line with our budget cycle and based on funding availability, giving us confidence that we can achieve them.

## ESG priority action plan for CY2024

	1. Climate resilience	2. Health and wellbeing	3. Inclusivity and community	4. Sustainable Technology and innovation	5. Governance and compliance
<b>Company led</b> (funding committed)		Curriculum review incl welfare/mental health services  Blueprinting Welfare  Student Management system	INTO Giving re-focus		Agent code of Conduct agreement with BUILA  Global Asset register & EPC certifications
Join the Climate Action Barometer for International Education (to aid in tracking/benchmarking our performance to the market)					
<b>Company led</b> (funding dependent)	Single global travel booking & reporting  Physical asset improvement investments				Sustainable & Ethical procurement  Path to ISO140001
<b>Employee Action Group Led</b> (Volunteer dependent)	Making our travel more sustainable guidelines		Volunteering day promotion  Establishing where can we help in our ecosystem of international students and how?	Mapping out Sustainability and Environmental-Focused education product offering	



## For more information visit [intoglobal.com](https://intoglobal.com) or contact us:

### North America

INTO University Partnerships  
8910 University Center Lane  
Suite 400  
San Diego, CA 92122  
T: +1 858 356 4400

### Europe, Middle East and Africa

INTO University Partnerships  
One Gloucester Place  
Brighton, East Sussex  
BN1 4AA, United Kingdom  
T: +44 (0)1273 665200

### Asia

INTO University Partnerships  
Unit 1007, 10/F  
Wing On Kowloon Centre  
345 Nathan Road  
Jordan, Hong Kong  
T: +852 2105 6800

### Australia

INTO Australia  
Level 29, Central Park Tower  
152-158 St Georges Terrace  
Perth WA 6000

 @INTOglobal

 [www.linkedin.com/company/into-university-partnerships](https://www.linkedin.com/company/into-university-partnerships)

