

As we mature on our sustainability journey, we are guided by best practice and globally respected reporting frameworks like the Task Force on Climate-related Disclosures (TCFD) and Internet Media & Services Industry SASB Standards when monitoring and communicating our position, action and progress on key environmental, social and governance (ESG) indicators. We will continue to evolve our disclosure and align our ESG reporting to commonly accepted standards, which shareholders know and trust.

In this inaugural SASB reference table we disclose our response to the required accounting metrics included in the standards. Where we do not disclose metrics, we elaborate in our response as these are either not appropriate or applicable to our business or we are in the process of identifying appropriate metrics.

Disclosure topic	Disclosure number	Disclosure accounting metric	Response and/or location (page, URL)	
INTERNET MEDIA & SERVICES INDUSTRY				
	TC-IM-130a.1	(1) Total energy consumed, (2) percentage grid electricity, and (3) percentage renewable	As a digital services investor and operator, our core business activities have a limited carbon footprint. Our scope 2 emissions are primarily from the use of energy in our office infrastructure. We have the ambition to reduce energy usage and replace with renewable sources, where possible.	
			Refer to our scope 1, 2 and 3 emissions disclosed in the annual report: The environment: page 92	
Environmental footprint of hardware infrastructure	TC-IM-130a.2	(1) Total water withdrawn, (2) total water consumed and percentage of each in regions with high or extremely high baseline water stress	This indicator is not material to Prosus N.V. (Prosus) businesses as a whole, which are largely web-based services, though certain business segments operate in locations that are likely to be impacted by high baseline water stress, like India and South Africa. Implying an overall societal level impact and is unlikely to disrupt operations of Prosus-owned businesses.	
	TC-IM-130a.3	Discussion of the integration of environmental considerations into strategic planning for data-centre needs	At Prosus holding company level there is no customer interface and cloud services procured are limited to meeting the needs of employees. We extend our approach on responsible procurement to cloud services by partnering with mature vendors who have robust environmental management strategies in place.  Our investment strategy guides us to focus on sectors, such as fintech, edtech and classifieds that significantly reduce the need for physical infrastructure and transportation for delivery of financial services, education and resale of goods. Though the core business model of these sectors provides solutions for climate change mitigation and adaptation by reducing the need for physical infrastructure, they are anchored in the provision of digital services where procurement of cloud services and data centres are material considerations.	
			With the diversity of geographical location, business models and operational structures, each of these companies has its own procurement strategy for cloud services. None of the companies run their own data centres and are meeting their cloud services needs through established vendors like Amazon Web Services, Azure and Google, among others, who have their own environmental management programmes in place.	



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INTERNET MEDIA & SERVICES INDUSTRY				
Data privacy, advertising standards and freedom of expression	TC-IM-220a.1	Description of policies and practices relating to behavioural advertising and user privacy	Prosus and several of its subsidiary companies (eg OLX, eMAG and PayU) that operate in the EU have implemented appropriate cookie consent banners as a mechanism to comply with the ePrivacy Directive which regulates, inter alia, the access to and storage of files on end users' systems that are routinely used to enable analytics, website functionality and, where applicable, behavioural advertising. See www.prosus.com for an example of a cookie consent implementation, and an example of a cookie notice that we provide at group level to support the consent mechanism. Researchers should also consult subsidiary companies' websites to view the approach to online advertising compliance as these subsidiaries are the ones with direct consumer and or business-to-business (B2B) customer relationships where online behavioural advertising, including retargeting, could be implicated in business operations. Additionally, many of our subsidiary companies that engage in online advertising are members of the Interactive Advertising Bureau (IAB) and participate in industry best practice/compliance initiatives to pursue market alignment and consistent approach.	
	TC-IM-220a.2	Number of users whose information is used for secondary purposes	In our group policy on data-privacy governance, we maintain a provision that explicitly speaks to the expectation that subsidiaries will ensure respect for context of data collection, specifically 'Principle 3: We should recognise that data subjects' expectations about fair and ethical use of their personal data are informed by the context in which their data was first collected.' Where legally required (and where practicable if there is no legal requirement), we seek permission before using personal data for new purposes that are incompatible with the original context in which the data was collected, to avoid unwelcome surprise (refer to www. prosus. com/about/policies). As such, so-called 'secondary purposes' must be supported by a valial legal basis and, where appropriate, the consent of individuals. The subsidiary companies do not sell personal data to third parties and third-party transfers must similarly be supported by appropriate legal grounds. We do not have a practice of quantifying each and every instance of compliant third-party transfers or new purposes deployed among subsidiaries, as they are restricted to circumstances where they are legally supported.	



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INTERNET MEDIA & SERVICES INDUSTRY				
Data privacy, advertising standards and freedom of expression	TC-IM-220a.3	Total amount of monetary losses as a result of legal proceedings associated with user privacy	As part of our group's quarterly reporting, our subsidiaries notify us of pending claims, litigation and penalties that may be imposed by local authorities in jurisdictions where they operate, and should such penalties manifest, our process would allow us to report on them. Based on recent quarterly reporting, we have observed no such losses as a result of legal proceedings associated with user privacy.	
	TC-IM-220a.4	(1) Number of law enforcement requests for user information, (2) number of users whose information was requested, and (3) percentage resulting in disclosure	While we do not currently report on such requests, we do have a process in place as part of quarterly privacy group reporting to begin to aggregate the nature, number and dispositions of requests from law enforcement authorities to access personal data held by group companies. This reporting will first be aggregated for internal analysis by March 2022.	
	TC-IM-220a.5	List of countries where core products or services are subject to government-required monitoring, blocking, content filtering, or censoring	We do not currently include this topic as part of our internal group reporting by subsidiaries, but it is noted that the business models in our portfolio (Classifieds, Food Delivery, Payments and Fintech, and Ecommerce) are not typically subject to 'content-oriented' requests that would be relevant to video content or social media company interventions by governments.	
	TC-IM-220a.6	Number of government requests to remove content, percentage compliance with requests	As part of our group's quarterly reporting our subsidiaries notify us of data breaches and material incidents involving data, including the scale of impact where applicable. We are investigating appropriate quantitative disclosures on this topic.	



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INTERNET MEDIA & SERVICES INDUSTRY				
Data security	TC-IM-230a.1	(1) Number of data breaches, (2) percentage involving personally identifiable information (PII), and (3) number of users affected	As part of our group's quarterly reporting, our subsidiaries notify us of data breaches and material incidents involving data, including the scale of impact where applicable. We are investigating appropriate quantitative disclosures on this topic.	
	TC-IM-230a.2	Description of approach to identifying and addressing data-security risks, including use of third-party cybersecurity standards	Our approach to addressing data-security risks is outlined in our cybersecurity policy, which is available here: www.prosus.com/ about/policies In this policy, we emphasise our expectations that subsidiary companies are governed, secure, vigilant and resilient, with more detailed expectations outlined for each of these domains. Our risk teams conduct routine audits, pen testing and coordinate with bug bounty programs to support subsidiary companies' capacity to manage cyber- and security-related risks. Employee training on security is embedded in group training platforms. We use the NIST framework as a common globally recognised benchmark and have identified ISO 27001 as a potentially relevant third-party certification standard.  Also see our annual report: Cybersecurity and technology resilience: page 81	
Employee recruitment, inclusion and performance	TC-IM-330a.1	Percentage of employees that are foreign nationals	As Prosus group operations are located in many different countries worldwide, we employ people from all origins and we think about diversity and inclusion broadly. Wherever we operate we employ local people.  Prosus reports on the number of permanent employees globally, as well as the headcount by region and segment.  For more detail refer to:  Annual report: Our people: Permanent employees, as well as Headcount by region and segment: page 85  Annual report: Where we operate: We focus on high-growth segments: page 17	
	TC-IM-330a.2	Employee engagement as a percentage	We assess our progress in building an inclusive workplace by asking all our employees for their feedback as part of our annual engagement survey. Monitoring the results enables us to understand if we are making the positive impact we want, and the results this year show great progress. For more detail refer to: our annual report: Our people: Involving our employees: page 89  We are investigating appropriate quantitative disclosures on this topic.	



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INTERNET MEDIA & SERVICES INDUSTRY				
Employee recruitment, inclusion and performance	TC-IM-330a.3	Percentage of gender and racial/ethnic group representation for (1) management, (2) technical staff, and (3) all other employees	As Prosus group operations are located in many different countries worldwide, we employ people from all origins and we think about diversity and inclusion broadly and respect the dignity and human rights of individuals and communities wherever we operate. We are committed to building an inclusive workplace where everyone feels welcome and can thrive, regardless of their gender, gender identity, gender expression, transgender status, sexual orientation, class or race. Prosus reports on the gender of permanent employees globally (male versus female), as well as the headcount by region and segment.  The group recognises and embraces the benefits of having a diverse board and sees diversity at board level as an essential element in maintaining a competitive advantage. Prosus reports on gender, race and ethnicity diversity on its board and senior management team.  We will continue to investigate further appropriate quantitative disclosures on this topic.  For more detail refer to:  Annual report: Our people: Permanent employees (male versus female), as well as Headcount by region and segment: page 85  Annual report: Our people: Focusing on gender diversity: page 88  Website: Management team: www.prosus.com/about  Governance report: Governance for a sustainable business: Composition: page 107; and Report of the nomination committee: Board diversity policy: page 130	
Intellectual property, protection and competitive behaviour	TC-IMC-520a.1	Total amount of monetary losses as a result of legal proceedings associated with anti-competitive-behaviour regulations	In 2021, Prosus did not incur any monetary losses as a result of legal proceedings associated with anti-competitive behaviour, including intellectual property infringement. This does not cover our portfolio of investee companies (controlled and non-controlled).	



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OTHER RELEVANT SASB DISCLOSURES				
Greenhouse gas emissions	FB-AG 110a,1	Gross global scope 1 emissions	Refer to our scope 1, 2 and 3 emissions disclosed in the annual report: The environment: page 92	
Labour practices	SV-HL-310a.4	Description of policies and programmes to prevent worker harassment	We are committed to creating work environments that are free from harassment of any kind.	
			For more detail refer to:	
			Annual report: Our people: Involving our employees: page 89     Anti-harassment policy is available on www.prosus.com/about/policies	