

Governance

ESG metrics

1. Corporate governance

GRI 102-22 GRI 102-23

1.1. Board characteristics: Board composition, Board effectiveness, Board skills & diversity

Name	Current position	Gender	Executive / Independent
John Schwarz	Chair of the Board	♂	Independent Non-executive
Ondrej Vlcek	Chief Executive Officer	♂	Executive
Philip Marshall	Chief Financial Officer	♂	Executive
Warren Finegold	Senior Independent Non-Executive Director	♂	Independent Non-executive
Pavel Baudis	Non-Executive Director	♂	Founder Non-executive
Maggie Chan Jones	Independent Non-Executive Director	♀	Independent Non-executive
Eduard Kucera	Non-Executive Director	♂	Founder Non-executive
Tamara Minick-Scokalo	Independent Non-Executive Director	♀	Independent Non-executive
Belinda Richards	Independent Non-Executive Director	♀	Independent Non-executive

55%
INDEPENDENT
DIRECTORS

33%
WOMEN

Name	Tenure	Board meeting attendance (2020)	External Board appointments	Expertise	Committees
John Schwarz	9	12 of 12	3	IT, R, F	NC, RC
Ondrej Vlcek	2	12 of 12	0	IT	
Philip Marshall	2	12 of 12	0	R, F	
Warren Finegold	8	12 of 12	1	R, F	NC, AC
Pavel Baudis	14	12 of 12	0	IT, F	
Maggie Chan Jones	1	12 of 12	2	IT, R	NC, AC
Eduard Kucera	14	12 of 12	0	F	
Tamara Minick-Scokalo	2	12 of 12	0	R	RC, AC
Belinda Richards	2	12 of 12	3	IT, R, F	AC, RC

AC Audit and Risk Committee

NC Nomination Committee

RC Remuneration Committee

Committee Chair

IT Information technology expert (i.e. industry expert)

F Financial expert

R Risk expert

Table data as of June 2021

Tenure is calculated as the number of full years served as Director in Avast, up to 2020

1.2. Board nominations GRI 102-24

Criteria	Data & Information
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Nomination and selection processes for the highest governance body and its committees	Annual Report 2020 , p. 106
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Criteria used for nominating and selecting highest governance body members	Annual Report 2020 , p. 106
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1.3. Collective knowledge of the Board GRI 102-27

Criteria	Data & Information
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Measures taken to develop and enhance the highest governance body's collective knowledge of environmental and social topics	The Board's knowledge of environmental and social topics relevant to the business is informed by internal and external stakeholder engagement, with priority given to strategically significant ESG issues
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1.4. Board effectiveness GRI 102-24 GRI 102-28

Criteria	Data & Information
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Board Performance Review	Annual Report 2020 , p. 94-95
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Board Election Process	Annual Report 2020 , p. 131
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Board Meeting Attendance	See table Board characteristics , under 1.1
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Board Mandates	See table Board characteristics , under 1.1
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1.5. Ownership and control

Criteria	Data & Information	
	Name	% of total voting rights
Significant shareholders	Paba Software s.r.o. (Pavel Baudis)	25.0%
	Pranticole Investments Limited (Eduard Kucera)	9.7%
	Schroder Investment Management	5.0%

As of 31 May 2021, the above persons are known to the company to hold interests in shares carrying 3% or more in voting rights

1.6. Shareholder rights

Criteria	Data & Information
Voting rights for common shares	Annual Report 2020 , p. 131
Restrictions on voting rights	Annual Report 2020 , p. 131
Size of shareholding necessary to introduce a new resolution	5 percent – Articles of Association of Avast plc , p. 17
Facilitation of shareholder participation	<p>Avast facilitates shareholder engagement with the Company executive and board, in particular for the long-term</p> <p>The company encourages participation in shareholder meetings and votes – Notice of AGM</p> <p>The AGM is designed in accordance with the best practice guidance issued by the Financial Reporting Council in relation to the holding of shareholder meetings and participation during the Covid-19 pandemic</p>

1.7. Intellectual property protection and competitive behaviour

SASB
TC-SI-520a.1

Criteria

Data & Information

Total amount of monetary losses as a result of legal proceedings associated with anti-competitive behavior regulations

No cases of anti-competitive behavior were identified in 2020

1.8. Governance

1.8.1. Governance structure

GRI
102-18

GRI
102-19

GRI
102-20

Criteria

Data & Information

Governance structure of the organization, including committees of the highest governance body

[Annual Report 2020](#), p. 92-93

Committees responsible for decision-making on environmental and social topics

Audit and Risk Committee – [Annual Report 2020](#), p. 98, 131

Information whether post holders report directly to the highest governance body

Avast has committed to establishing a structured ESG reporting system – [Annual Report 2020](#), p. 76

1.9. Compensation

1.9.1. Non-executive Director pay

Criteria

Data & Information

Director equity policy

[Annual Report 2020](#), p. 116

Clawbacks & Malus

[Annual Report 2020](#), p. 116

1.9.2. Remuneration of the Executive Management team

Criteria	Data & Information
Pay Performance alignment	Directors' remuneration report and Remuneration Policy - Annual Report 2020 , p.107-128
Public disclosure of CEO to employee pay ratio	Annual Report 2020 , p. 126
Public disclosure of compensation schemes for members of the executive management team	Remuneration schemes are disclosed for the CEO and CFO - Annual Report 2020 , p.107-128

1.9.3. Remuneration policies

GRI
102-35

Criteria	Data & Information
Remuneration policy	Summary of remuneration policy - Annual Report 2020 , p. 111 Full remuneration policy – Annual Report 2018 , p. 74-83

1.10. Stakeholders

GRI
102-21

GRI
102-40

GRI
102-44

Criteria	Data & Information
List of stakeholders	Annual Report 2020 , p. 27. Stakeholders include, but are not limited to: Communities Customers Employees Shareholders Suppliers
Stakeholders' topics through stakeholder engagement	Annual Report 2020 , p. 82-84

Processes for consultation between stakeholders and the highest governance body on environmental and social topic

[Annual Report 2020](#), p. 82-84

2. Tax transparency GRI 207-1

Criteria	Data & Information
A publicly available and group-wide tax policy	Group Tax Strategy

3. Business ethics

Criteria	Data & Information
Anti-corruption Policy for Employees	Avast Code of Conduct , p. 3
Anti-corruption Policy for Suppliers	Avast Supplier Guidelines
Anti-corruption Policies and Procedures communication	<p>Anti-corruption policies and relevant procedures (Avast Anti-Corruption Policy and the Code of Conduct) are communicated to employees via the Company intranet and other internal systems</p> <p>Anti-corruption policies and procedures are communicated to suppliers and other external stakeholders including via the corporate web (Avast Supplier Guidelines, Avast Code of Conduct, p. 4)</p>
Employee Training on Ethical Standards	Modern Slavery training is provided to employees via presentations and workshops,

Codes of Conduct

benefiting departments, including Legal, Procurement (Finance), IT Procurement, Facilities and Sales Operations. ([Modern Slavery Policy](#))

The [Avast Code of Conduct](#) encompasses a number of areas including Corruption and Bribery, Discrimination, Confidentiality of Information, Conflicts of Interest, Anti-competitive practices, Money-laundering, Environment, Health and Safety, Whistleblowing

Code of conduct breaches

There were no code of conduct breaches in 2020

Values, principles, standards, and norms of behavior

GRI
102-16

[Annual Report 2020](#), p. 79

Avast standards align with the UK Corporate Governance Code

Mechanism for advice and concerns about ethics

GRI
102-17

[Avast Code of Conduct](#), p. 7

Avast maintains an Ethics & Reporting Line, accessible at avast.ethicspoint.com, to report violations of

the Code of Conduct, on a confidential basis online or over the phone

4. Privacy and data security

4.1. Privacy policy

SASB
TC-SI-220a.1

Criteria

Data & Information

Description of policies and practices relating to behavioral advertising and user privacy
Privacy policy applies to the entire operations, including suppliers

Covered under [Privacy Policy](#), including specialist sections for [Products Policy](#), [VPN Policy](#), and [Cookies Policy](#)

Defined point of contact in place for escalation of privacy issues

Covered by sections Contact Us and Data Protection Officer in [Privacy Policy](#)

Audit of privacy policy compliance

TrustArc certification - [TRUSTe's Enterprise Privacy & Data Governance Practices Certification program](#)

Employee training on data security and/or privacy-related risks & procedures

Mandatory training is given to all employees by the means of an online training platform Certified Secure to enhance cybersecurity skills and awareness
 Avast also provides additional enhanced voluntary training and testing for technical experts and system administrators

4.2. Practices

Criteria

Data & Information

Rights provided to individuals regarding the control of their data

Information on data subject rights as well as contact details for Avast customer service and the Data Protection Office are set out in the [Privacy Policy](#)
 The [Avast privacy portal](#) provides Avast customers an explanation of privacy options, as well as the automatic export of account data

Company's executive body responsible for: Privacy and Data security

General Counsel and Company Secretary, Chief Privacy Officer, Data Protection Officer and Chief Information Security Officer

Practices and consent requirements around handling of personal data by third parties

Full description in Avast [Privacy Policy](#), section "How We Disclose Your Personal Data"

Extent of data protection and/or privacy programs covering suppliers and business partners

Avast has a third-party assessment program which is undertaken with respect to each of our suppliers and business partners to which we transfer personal data, or which process personal data on our behalf. As part of this

program, we assess whether the practices of our suppliers and business partners are in line with applicable regulation

Requests for user information: Number of law enforcement requests for user information

Available in [Public Transparency Report](#)

Requests for user information: Percentage resulting in disclosure

Available in [Public Transparency Report](#)