

Phreesia

# Sustainability Accounting Standards Board (SASB) Report

FISCAL YEAR 2026



SASB Code	Metric	Fiscal Year 2024 Disclosure	Fiscal Year 2025 Disclosure	Fiscal Year 2026 Disclosure
<b>Environmental Footprint of Hardware Infrastructure</b>				
TC-SI-130a.1	Total energy consumed	Phreesia's workforce has been fully remote since 2020, and Phreesia outsources all of its data center usage. As such, Phreesia does not currently report energy consumption information.	Phreesia's workforce has been fully remote since 2020, and Phreesia outsources all of its data center usage. As such, Phreesia does not currently report energy consumption information.	Phreesia's workforce has been fully remote since 2020, and Phreesia outsources all of its data center usage. As such, Phreesia does not currently report energy consumption information.
	Percentage grid electricity			
	Percentage renewable			
TC-SI-130a.2	Total water withdrawn	Phreesia's workforce has been fully remote since 2020, and Phreesia outsources all of its data center usage. As such, Phreesia does not currently report water withdrawal or consumption information.	Phreesia's workforce has been fully remote since 2020, and Phreesia outsources all of its data center usage. As such, Phreesia does not currently report water withdrawal or consumption information.	Phreesia's workforce has been fully remote since 2020, and Phreesia outsources all of its data center usage. As such, Phreesia does not currently report water withdrawal or consumption information.
	Total water consumed, percentage of each in regions with High or Extremely High Baseline Water Stress			
TC-SI-130a.3	Discussion of the integration of environmental considerations into strategic planning for data center needs	Phreesia has consolidated all corporate data centers to utilize energy-efficient vendors and to run workloads in a dense manner, reducing excess energy usage.	Phreesia has consolidated all corporate data centers to utilize energy-efficient vendors and to run workloads in a dense manner, reducing excess energy usage.	Phreesia has consolidated all corporate data centers to utilize energy-efficient vendors and to run workloads in a dense manner, reducing excess energy usage.

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<b>Data Privacy &amp; Freedom of Expression</b>				
TC-SI-220a.1	Description of policies and practices relating to behavioral advertising and user privacy	<p>Phreesia’s products and services necessarily involve the use and processing of personally identifiable information, including Protected Health Information (“PHI”), as that term is defined under the Health Insurance Portability and Accountability Act (“HIPAA”). On behalf of and at the direction of healthcare services organizations, the Phreesia platform registers patients for visits and collects demographic information and other health and personal information. Phreesia may use service providers and other third parties to deliver services, support the product and help Phreesia meet its mission and objectives. Phreesia retains information as necessary to perform its contractual, legal and business obligations. With patient consent, Phreesia also may deliver targeted content to patients on behalf of healthcare services organizations that may include materials related to treatments and therapies specific to patients’ health conditions. Phreesia is committed to ensuring that its data policies and procedures are consistent with applicable legal and regulatory requirements. For instance, Phreesia obtains the appropriate agreements, consents and authorizations, as legally necessary, in order to perform its services and activities. Phreesia also implements privacy and information security policies that govern the protection of sensitive data, consistent with applicable laws and industry frameworks. Phreesia is annually assessed by trusted audit organizations for Sarbanes-Oxley, HITRUST, PCI DSS &amp; SOC 2 compliance.</p>	<p>Some of Phreesia’s products and services necessarily involve the use and processing of personally identifiable information, including Protected Health Information (“PHI”), as that term is defined under the Health Insurance Portability and Accountability Act (“HIPAA”). On behalf of and at the direction of healthcare services organizations, the Phreesia patient intake platform registers patients for visits and collects demographic information and other health and personal information. Phreesia may use service providers and other third parties to deliver services, support the product and help Phreesia meet its mission and objectives. Phreesia retains information as necessary to perform its contractual, legal and business obligations. With patient consent, Phreesia also may deliver relevant health information that may include materials related to treatments and therapies specific to patients’ health conditions. Phreesia is committed to ensuring that its data policies and procedures are consistent with applicable legal and regulatory requirements. For instance, Phreesia obtains the appropriate agreements, consents and authorizations, as legally necessary, in order to perform its services and activities. Phreesia also implements privacy and information security policies that govern the protection of sensitive data, consistent with applicable laws and industry frameworks. Phreesia is annually assessed by trusted audit organizations for Sarbanes-Oxley, HITRUST, PCI DSS &amp; SOC 2 compliance.</p>	<p>Some of Phreesia’s products and services involve the use and processing of personally identifiable information, including Protected Health Information (“PHI”), as that term is defined under the Health Insurance Portability and Accountability Act (“HIPAA”). On behalf of and at the direction of healthcare services organizations, the Phreesia patient intake platform registers patients for visits and collects demographic information and other health and personal information. Phreesia may use service providers and other third parties to deliver services, support the product and help Phreesia meet its mission and objectives. Phreesia retains information as necessary to perform its contractual, legal and business obligations. With patient consent, Phreesia also may deliver relevant health information that may include materials related to treatments and therapies specific to patients’ health conditions. Phreesia is committed to ensuring that its data policies and procedures are consistent with applicable legal and regulatory requirements. For instance, Phreesia obtains the appropriate agreements, consents and authorizations, as legally necessary, in order to perform its services and activities. Phreesia also implements privacy and information security policies that govern the protection of sensitive data, consistent with applicable laws and industry frameworks. Phreesia is annually assessed by trusted audit organizations for Sarbanes-Oxley, HITRUST, PCI DSS &amp; SOC 2 compliance.</p>

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TC-SI-220a.2	Number of users whose information is used for secondary purposes	When allowed, Phreesia uses aggregated and/or de-identified data to monitor product performance and usage, enhance and supplement product features, and for other lawful business purposes. Phreesia also may use de-identified data to collaborate with public health organizations or similar entities to support public health or research initiatives, when appropriate.	When allowed, Phreesia uses aggregated and/or de-identified data to monitor product performance and usage, enhance and supplement product features, and for other lawful business purposes. Phreesia also may use de-identified data to collaborate with public health organizations or similar entities to support public health or research initiatives, when appropriate.	When allowed, Phreesia uses data, including aggregated and/or de-identified data, to monitor product performance and usage, enhance and supplement product features, and for other lawful business purposes. Phreesia also may use de-identified data to collaborate with public health organizations or similar entities to support public health or research initiatives, when appropriate.
TC-SI-220a.3	Total amount of monetary losses as a result of legal proceedings associated with privacy	None	None	None
TC-SI-220a.4	(1) Number of law enforcement requests for user information; (2) number of users whose information was requested; (3) percentage of requests resulting in disclosure	None	None	None
TC-SI-220a.5	List of countries where core products or services are subject to government-required monitoring, blocking, content filtering, or censoring.	Phreesia delivers its core products and services to clients, which are mostly located in the U.S. Any core products or services offered outside of the U.S. are not offered in countries where those products and services would be subject to government monitoring, blocking, content filtering or censoring.	Phreesia delivers its core products and services to clients, which are mostly located in the U.S. Any core products or services offered outside of the U.S. are not offered in countries where those products and services would be subject to government monitoring, blocking, content filtering or censoring.	Phreesia delivers its core products and services to clients, which are mostly located in the U.S. Any core products or services offered outside of the U.S. are not offered in countries where those products and services would be subject to government monitoring, blocking, content filtering or censoring.

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<b>Data Security</b>				
TC-SI-230a.1	Number of data breaches	In its fiscal year ended January 31, 2024, Phreesia had no data breaches as defined under HIPAA.	Any material data breach incidents would be disclosed in Phreesia's SEC filings.	Any material data breach incidents would be disclosed in Phreesia's SEC filings.
	Percentage of data breaches involving personally identifiable information	N/A		
	Number of users affected by data breaches	N/A		
TC-SI-230a.2	Description of approach to identifying and addressing data security risks, including use of third-party cybersecurity standards	<p>Phreesia identifies and addresses risks using a layered approach from both a technical and governance perspective. Phreesia follows HIPAA security and privacy requirements along with National Institute of Standards and Technology (NIST) and ISO/IEC 27001 best practices. In addition, Phreesia undergoes rigorous third-party testing including:</p> <ul style="list-style-type: none"> <li>SSAE 18 SOC 2 Type 2 attestation</li> <li>HITRUST Certification</li> <li>PCI DSS Level 1 Service Provider Compliance</li> <li>Sarbanes-Oxley (SOX) Compliance</li> <li>Network Penetration testing</li> <li>PCI Approved Scanning Vendor (ASV) testing</li> </ul> <p>Phreesia requires and conducts regular additional internal and external testing of its security controls, above and beyond those mandated by compliance frameworks. Any risks are attended to by Phreesia's Privacy, Compliance and Security teams, as appropriate.</p>	<p>Phreesia identifies and addresses risks using a layered approach from both a technical and governance perspective. Phreesia follows HIPAA security and privacy requirements along with National Institute of Standards and Technology (NIST) and ISO/IEC 27001 best practices. In addition, Phreesia annually undergoes rigorous third-party testing including:</p> <ul style="list-style-type: none"> <li>SSAE 18 SOC 2 Type 2 attestation</li> <li>HITRUST Certification</li> <li>PCI DSS Level 1 Service Provider Compliance</li> <li>Sarbanes-Oxley (SOX) Compliance</li> <li>Network Penetration testing</li> <li>PCI Approved Scanning Vendor (ASV) testing</li> </ul> <p>Phreesia requires and conducts regular additional internal and external testing of its security controls, above and beyond those mandated by compliance frameworks, including an annual HIPAA Security Risk Assessment. Any risks identified are attended to by Phreesia's Privacy, Compliance and Security teams, as appropriate.</p>	<p>Phreesia identifies and addresses risks using a layered approach from both a technical and governance perspective. Phreesia follows HIPAA security and privacy requirements along with National Institute of Standards and Technology (NIST) and ISO/IEC 27001 best practices. In addition, Phreesia annually undergoes rigorous third-party testing including:</p> <ul style="list-style-type: none"> <li>SSAE 18 SOC 2 Type 2 attestation</li> <li>HITRUST Certification</li> <li>PCI DSS Level 1 Service Provider Compliance</li> <li>Sarbanes-Oxley (SOX) Compliance</li> <li>Network Penetration testing</li> <li>PCI Approved Scanning Vendor (ASV) testing</li> </ul> <p>Phreesia requires and conducts regular additional internal and external testing of its security controls, above and beyond those mandated by compliance frameworks, including an annual HIPAA Security Risk Assessment. Any risks identified are attended to by Phreesia's Privacy, Compliance and Security teams, as appropriate.</p>

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<b>Recruiting &amp; Managing a Global, Diverse &amp; Skilled Workforce</b>				
TC-SI-330a.1	Percentage of employees in the U.S.	66%	40%	42.3%
	Percentage of employees outside of the U.S.	34%	60%	57.7%
TC-SI-330a.3	Percentage of people managers with one or more underrepresented racial/ethnic backgrounds	24%	17.8%*	23.3%*
	Percentage of technical staff with one or more underrepresented racial/ethnic backgrounds	51.5%	38.8%*	52.7%*
	Percentage of all other employees with one or more underrepresented racial/ethnic backgrounds	34%	29.6%*	26.9%*
	Percentage of people managers who identify as female	48.5%	48.6%	51.8%
	Percentage of technical staff who identify as female	23.1%	26.2%	26.1%
	Percentage of all other employees who identify as female	57.9%	57.2%	60.7%
<b>Intellectual Property Protection &amp; Competitive Behavior</b>				
TC-SI-520a.1	Total monetary losses as a result of legal proceedings associated with anti-competitive behavior regulations	None	None	None

\*Phreesia does not collect information on the racial and/or ethnic background of employees based in India. As such, the reported percentage only includes Phreesia employees based in North America.

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<b>Managing Systemic Risks from Technology Disruptions</b>				
TC-SI-550a.1	(1) Number of performance issues; (2) number of service disruptions; (3) total customer downtime	From time to time, Phreesia experiences minor performance issues and service disruptions that affect the use of its products. These issues are rare, and the performance issues and service disruptions that Phreesia experienced in the fiscal year ended January 31, 2024, did not have a material impact on its business.	From time to time, Phreesia experiences minor performance issues and service disruptions that affect the use of its products. During the fiscal year ended January 31, 2025, we experienced a disruption to one of our services, which has now been restored. See “Management’s Discussion and Analysis of Financial Condition and Results of Operations” in Phreesia’s Quarterly Report on Form 10-Q for the three months ended October 31, 2024, for more information. The performance issues and service disruptions that Phreesia experienced in the fiscal year ended January 31, 2025, did not have a material impact on its business.	From time to time, Phreesia experiences minor performance issues and service disruptions that affect the use of its products. These issues are rare, and the performance issues and service disruptions that Phreesia experienced in the fiscal year ended January 31, 2026, did not have a material impact on its business.
TC-SI-550a.2	Description of business continuity risks related to disruptions of operations	See Item 1A. Risk Factors of Phreesia’s Annual Report on Form 10-K for the fiscal year ended January 31, 2024, for information regarding the risk of service disruptions to Phreesia’s operations.	See Item 1A. Risk Factors of Phreesia’s Annual Report on Form 10-K for the fiscal year ended January 31, 2025, for information regarding the risk of service disruptions to Phreesia’s operations.	See Item 1A. Risk Factors of Phreesia’s Annual Report on Form 10-K for the fiscal year ended January 31, 2026, for information regarding the risk of service disruptions to Phreesia’s operations.

Phreesia completed the acquisition of AccessOne Parent Holdings, Inc. and its subsidiaries (collectively, “AccessOne”) on November 12, 2025. Because AccessOne was not part of Phreesia for the majority of fiscal year 2026, and integration with Phreesia’s policies and practices remains ongoing, the disclosures in this report do not reflect AccessOne’s business operations, policies or metrics.

This report may include forward-looking statements relating to future events or Phreesia’s future performance. Actual results may differ materially from those described in the forward-looking statements and may be affected by a variety of risks and factors that are beyond Phreesia’s control. The forward-looking statements contained in this report are also subject to other risks and uncertainties, including those more fully described in Phreesia’s filings with the Securities and Exchange Commission (“SEC”), including in Phreesia’s most recently filed Annual Report on Form 10-K, Quarterly Reports on Form 10-Q and Phreesia’s other SEC filings. The forward-looking statements in this report speak only as of the date on which the statements are made. Phreesia undertakes no obligation to update, and expressly disclaims the obligation to update, any forward-looking statements made in this report to reflect events or circumstances after the date of this report or to reflect new information or the occurrence of unanticipated events, except as required by law.