



Independent
Financial Group

Diversity and Inclusion Policy

Equality and non-discrimination in EU legislation and beyond

This Diversity and Inclusion Policy sets out GWM Group's commitment to encouraging equality, diversity and inclusion among our workforce, and eliminating unlawful discrimination.

In this Policy when we refer to the "GWM Group" or "GWM" or "we"/"us"/"our" we mean GWM Group Holdings SA and our group entities, including GWM Capital Advisors LLP in London (regulated by the FCA) and GWM Asset Management Limited in Malta (regulated by the MFSA).

GWM's aim is for our workforce to be truly representative of all sections of society and for each employee to feel respected and able to give their best.

The Policy's purpose is to:

- provide equality, fairness, and respect for all in our employment, whether temporary, part-time or full-time;
- not unlawfully discriminate on the grounds of the protected characteristics of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race (including colour, nationality, and ethnic or national origin), religion or belief, sex and sexual orientation;
- oppose and avoid all forms of unlawful discrimination. This includes in pay and benefits, terms, and conditions of employment, dealing with grievances and discipline, dismissal, redundancy, leave for parents, requests for flexible working, and selection for employment, promotion, training or other developmental opportunities.

GWM commits to:

- Encourage equality, diversity, and inclusion in the workplace as they are good practice and make business sense;
- Create a working environment free of bullying, harassment, victimisation, and unlawful discrimination, promoting dignity and respect for all, and where individual differences and the contributions of all staff are recognised and valued;

- This commitment includes training all employees about their rights and responsibilities under the equality, diversity, and inclusion policy. Responsibilities include staff conducting themselves to help the organisation provide equal opportunities in employment, and prevent bullying, harassment, victimisation, and unlawful discrimination;
- All employees should understand they, as well as their employer, can be held liable for acts of bullying, harassment, victimisation, and unlawful discrimination, in the course of their employment, against fellow employees, clients and the public;
- Make opportunities for training, development and progress available to all staff, who will be helped and encouraged to develop their full potential, so their talents and resources can be fully utilised to maximise the efficiency of the organisation;
- Decisions concerning staff being based on merit (apart from in any necessary and limited exemptions and exceptions allowed under the EU Directive);
- Review employment practices and procedures when necessary to ensure fairness, and also update them and the policy to take account of changes in the law;
- Monitor the make-up of the workforce regarding information such as age, sex, ethnic background, sexual orientation, religion or belief, and disability in encouraging equality, diversity and inclusion, and in meeting the aims and commitments set out in the equality, diversity and inclusion policy.

Monitoring will also include assessing how the equality, diversity and inclusion policy, and any supporting action plan, are working in practice, reviewing them annually, and considering and taking action to address any issues.

The equality, diversity and inclusion policy is fully supported by senior management of GWM in each jurisdiction in which the GWM Group carries on business.

We are committed to equal opportunities and to increase our gender and racial balance as we head into 2021 and beyond.