

# Environmental, Social and Governance (ESG) Policy

## Contents

1. About this policy	3
2. Our purpose and our values	3
3. Intended Audience	3
4. Purpose of this policy	4
5. Governance of ESG	4
6. Our ESG commitment	5
7. Our statement on climate change and the environment	5
8. Our statement on social responsibility	6
9. Our statement on governance	6
10. Our statement on responsible investment	7
11. ESG and our reputation	7
12. Our responsibility to our clients	7
13. Your role to play in ESG	8
14. ESG and our value chain	9
15. Interaction of ESG within Policies	9
16. Policy and history of revisions	10

# 1. About this policy

- 1.1 Environmental, Social, and Governance) and Corporate Social Responsibility (ESG) and Corporate Social Responsibility (CSR) are related but distinct concepts:
- ESG evaluates a company's performance and impact in environmental, social, and governance areas.
  - CSR focuses primarily on social and ethical responsibility, including philanthropy, community engagement, and ethical labour practices. While CSR considers legal and ethical implications, ESG looks at broader social issues such as climate change and income inequality.
- 1.2 At Evelyn Partners, ESG and CSR are brought together under one banner of ESG and this informs our ESG efforts moving forward. This includes, but is not limited to, reporting, business practices, policies, processes and procedures, investments, board activities, stakeholder engagement, colleague engagement and communications.

# 2. Our purpose and our values

Our purpose is 'to place the power of good advice into more hands.' It is at the heart of everything we do. We believe that good advice is powerful as it allows people and businesses to flourish in the present, knowing that tomorrow is being taken care of. People and businesses must have access to good advice, delivered with due skills, care and diligence, regardless of the size of the investment or business. We are committed to being a key voice within our profession for raising the standards and reach of advice. Our values reflect what is unique about our culture and our shared ways of working. They are:

- **Personal** – we treat you as an individual,
- **Partnership** – we go further together,
- **Performance** – we strive for more.

# 3. Intended Audience

- 3.1 This policy is applicable to Evelyn Partners Group Limited ('the "Company"') and all its subsidiary entities (together, 'Evelyn Partners' or the 'Group'). The ESG policy must be applied at the Group level and to all business units including:
- Financial Services - Investment Management (IM)
  - Financial Services - Financial Planning (FP)
  - Central Functions (CF)
  - Fund Solutions
  - Bestinvest
  - All legal entities that sit within Evelyn Partners Group Limited.
  - The policy is applicable to any entity included above, where Evelyn Partners has a controlling interest. This policy applies to all Permanent and Fixed Term employees. It also applies to contractors, consultants, agency workers or self-employed individuals.
- 3.2 This policy is to be made available on our website and may be shared with our clients, business partners, suppliers, investors and other parties in our value chain, to ensure that our stakeholders are aware of our ESG policy and, where relevant, adhere to our policies.

## 4. Purpose of this policy

- 4.1 The purpose of this policy is to provide guidance and information about ESG factors which are relevant to Evelyn Partners, to outline our corporate and social responsibilities aims and how we are striving to meet these, including how we minimise the environmental impact across our operations and the value chain.
- 4.2 This policy does not form part of any contract of employment or other contract to provide services, and it may be amended at any time.

## 5. Governance of ESG

- 5.1 The Company, together with a subset of its regulated subsidiaries (as set out in the Company's schedule of matters reserved), mirror each other's board members, share governance and meet concurrently (together the "Group Boards").
- 5.2 The Group Board have overall responsibility for the effective operation of this policy. They have delegated responsibility for overseeing its implementation to the Board ESG Committee, and the day-to-day management to the Group Executive Committee ('GEC'), who are collectively responsible for setting and monitoring the Group's approach to the ESG. This includes leading the Group's work on ESG, making recommendations to the Board, and measuring the success of those strategies.

The GEC meets regularly to discuss and coordinate the ESG activities being undertaken across all four ESG pillars, and to consider ESG themes.

- 5.3 Four pillars have been identified with pillar leads appointed to ensure that objectives of each pillar are considered across the entire business. The ESG pillars are:
- Environment – how do we manage our business in a sustainable way to minimise our impact on the environment.
  - Responsible Investment – how do we incorporate consideration of ESG factors in the way we invest our clients' assets, alongside purely financial considerations.
  - People – how do we improve our social commitment and approach culture, equality, inclusion and diversity, wellbeing, people development and remuneration.
  - Charities and Communities – what is the corporate and colleague charitable objectives and how is this met.
- 5.4 The pillar leads are all members of the GEC. The Chief Executive Officer (CEO), as Chair of the GEC, has ultimate executive responsibility for corporate social responsibility and ESG.
- 5.5 The GEC and pillar leads are supported by committees, forums and networks, who work to ensure that the strategy of each pillar is communicated, supported and actioned by ESG specialists, management and colleagues across the business.
- 5.6 This policy is reviewed by the GEC and approved by the Board ESG Committee on an annual basis, or more frequently, if required to comply with changing legislation and guidance or to reflect a change in strategy.

## 6. Our ESG commitment

- 6.1 The ESG strategy informs the ESG policy, which sets out our approach to each element of ESG and how it is considered both operationally and within the value chain: our suppliers, employees, clients, investees and shareholders. This commitment impacts:
- how we operate,
  - how we incorporate ESG factors in the way we invest our clients' assets, alongside purely financial considerations, combined with the practice of active ownership, also known as stewardship.
  - how the people strategy supports the ESG strategy,
  - how we support charities and our local communities,
  - how we engage, train and communicate with our colleagues regarding ESG, and
  - how we collaborate with our stakeholders and report progress.

## 7. Our statement on climate change and the environment

- 7.1 We are committed to reducing our corporate carbon emissions, as we believe that climate change is a key global risk as well as a key risk for Evelyn Partners. Our environment strategy is aligned to our overall goal of reducing the environmental impact of our corporate operations and throughout the value chain.
- 7.2 We comply with current environmental legislation. We are supporters of CDP and complete the annual climate change questionnaire to ensure transparency as we develop our Carbon Strategy and work towards a Transition Plan, identifying the data improvements required as we work towards our overall goal of corporate Net Zero.
- 7.3 The Environment Management Framework (EMF) gives guidance on how we consider climate risk and opportunities and incorporate the requirements of the TCFD.
- 7.4 The Environment Policy gives specific guidance on how we are reducing our environmental and climate impact within our corporate operations and how we extend this across the value chain.
- 7.5 The Responsible Investment Policy outlines how ESG factors into investment analysis alongside traditional financial factors, and the practice of active ownership/stewardship.

## 8. Our statement on social responsibility

- 8.1 Our focus is to deepen relationships with our key stakeholders by investing in our colleagues and partnering with our clients, communities, investors, and suppliers.
- 8.2 We engage with our colleagues to provide an inclusive, equitable and diverse work environment that supports their professional development and promotes a good work-life balance that prioritises overall wellbeing, including both physical and mental health.
- 8.3 We support initiatives that benefit human welfare and education. This includes provision of training and development which advances workforce talent pipelines available to our clients and supports economic development in the communities in which we operate.
- 8.4 We engage with suppliers around health and safety, inclusivity and diversity, and wellness.
- 8.5 We preserve and promote the protection of human rights and welfare within our own business activities and within our supply chain, in accordance with our Conduct Risk Framework and Policy, and the Modern Slavery and Human Trafficking Statement.
- 8.6 As Responsible Investors, we participate in investor led initiatives to increase the effectiveness of corporate efforts against modern slavery in UK companies and in their value chains.
- 8.7 We are working to improve inclusivity and diversity within our communities and within our industry sectors. We partner with charities whose aims and values align with ours.
- 8.8 We support our colleagues' individual or team charitable endeavours, offering paid volunteering days to all colleagues allowing them to focus on causes that are meaningful to them. Additionally, we support charitable contributions and top-up colleague donations through Give-As-You-Earn.
- 8.9 We have set out specific guidance on how we meet our social responsibilities in our policies which can be found in the People policies and Charities and Community policies in our Policy Hub on SharePoint.

## 9. Our statement on governance

- 9.1 We promote strong oversight, transparency, and risk management at all levels within our organisation, ensuring the resilience and long-term preservation of value for our business.
- 9.2 We maintain strong corporate governance practices through effective Board stewardship, management accountability, and pro-active risk management.
- 9.3 We have a strong Conduct Risk Framework & Policy, ongoing ethics training, and an executive leadership that promotes a culture of integrity.
- 9.4 We identify and mitigate risk in line with the Risk Management Framework and risk management procedures.
- 9.5 We cultivate strong stakeholder relationships through transparency, open communications and collaboration, and respond to stakeholder queries honestly and with integrity. This extends to our relationships with our colleagues, clients, and all other stakeholders.
- 9.6 We have established clear and effective ESG governance as detailed in Section 5 above. The ESG strategy is reviewed annually and approved by the Board ESG Committee and the GEC. ESG measures are included in KPIs for our GEC members. A GEC member leads each pillar.

## 10. Our statement on responsible investment

- 10.1 Responsible Investment is about incorporating consideration of ESG factors in the way we invest our clients' assets, alongside purely financial considerations, combined with the practice of active ownership, also known as stewardship.
- 10.2 The Responsible Investment Policy outlines how ESG factors are integrated into investment analysis alongside traditional financial factors, and the practice of active ownership/stewardship and can be found on our website and on SharePoint in the Policy Hub.

## 11. ESG and our reputation

- 11.1 ESG is fundamental to our reputation as a business. Reputation is built through frequent and repeated interactions with stakeholders. When those interactions are positive, our business, and our reputation, can thrive. In an uncertain economic climate, positive reputation is one of the key drivers to long term success.
- 11.2 We want all our stakeholders, from clients, to investors, to our people and value chain, to be proud to be associated with our business. Part of that pride is understanding and communicating how our business makes a positive contribution to the world.

## 12. Our responsibility to our clients

- 12.1 We focus on putting our clients' interests first and are committed to fostering a culture anchored around the values of providing a highly personal service, building partnerships and striving to deliver excellent performance in everything we do.
- 12.2 We strive to ensure that our clients see us as corporate partners in their own enterprise.
- 12.3 Clients are increasingly asking how we are improving the world around us, protecting our shared natural heritage, investing in our communities and ultimately, how we are being good corporate citizens. It is therefore imperative that we can honestly and transparently demonstrate how we consider and implement ESG within our business.
- 12.4 It is also important that we are listening to how our clients ESG requirements are changing, to ensure that we offer innovative products and services to our clients, collaborating with them as business partners and valued advisors to support their ESG strategy and solutions requirements.
- 12.5 We consider our Consumer Duty to clients and take positive action to ensure good outcomes for consumers. In particular, our duty to act in good faith, avoiding causing foreseeable harm and supporting clients to pursue their financial objectives.

## 13. Your role to play in ESG

13.1 As a member of our business and valued colleagues, you have a vital responsibility to ensure our organisation thrives and is meeting our ESG objectives. This means understanding your role and where it interacts with ESG. You can start by familiarising yourself with the concept of ESG as outlined below and within this policy.

13.2 Environmental - We all have a role to play in reducing carbon emissions and protecting our natural environment. We are working towards organisation-level targets. Detailed guidance is available in the 'Environmental Management Framework' and the 'Environment Policy' which can be found in the Corporate Responsibility Hub on SharePoint.

13.3 Social - Building an inclusive and diverse culture where we all feel valued is everyone's responsibility. Our Inclusion and Diversity Strategy seeks to embed a culture that values diversity, giving colleagues a voice, and the safety to speak and be themselves. We aim to educate, recruit and retain a diverse workforce that reflects wider society and our broad client base.

Understanding your role in bringing people together is equally critical to our success as a business. From hiring the best talent to encouraging all colleagues to thrive, you can help by:

- Challenging and reporting discriminatory or offensive behaviour
- Understanding inclusive, equitable and diversity policies
- Being an active ally for underrepresented groups
- Leading by example

For further guidance, please see the Equality, Diversity and Inclusion policy and the Talent Acquisition policy.

Our People policies which include social responsibility policies can be found on the Policy hub under 'People policies' on SharePoint.

13.4 Charities and communities - We have a wealth of talent and experience within our business and are keen to share this with our communities. We encourage colleagues to get involved in community projects and activities.

The Group's corporate charitable objective is to improve diversity in its business sectors. This aligns with the Group's inclusion and diversity strategy.

Our strategy for Charities and Communities comprises of four strands:

- Corporate charitable giving,
- Colleague charitable giving,
- Volunteering with our corporate partner,
- Volunteering with community charities as selected by our colleagues.

Our Charities and Communities policies can be found on the central policy hub within the Corporate Responsibility policies.

13.5 Governance - Good governance goes beyond having the right policies and procedures in place. It is about embedding compliance in your day-to-day work. From completing training on time, to actively understanding how regulations affect your work, good governance starts from the individual acting fairly and with integrity. Take governance to heart by:

- Being a compliance champion in your team
- Referring to policies and procedures instead of shortcuts
- Being aware of red flags for compliance failures and risks in your area of work.
- Being unafraid to call out poor behaviour or report failures.



- 13.6 There are aspects of ESG in all our roles where we can make improvements. If you have identified ESG improvements, or any risks or opportunities that you wish to highlight in our operational activities, investment activities, in the value chain and in our client interactions, please reach out by contacting our ESG Director, in the first instance.

## 14. ESG and our value chain

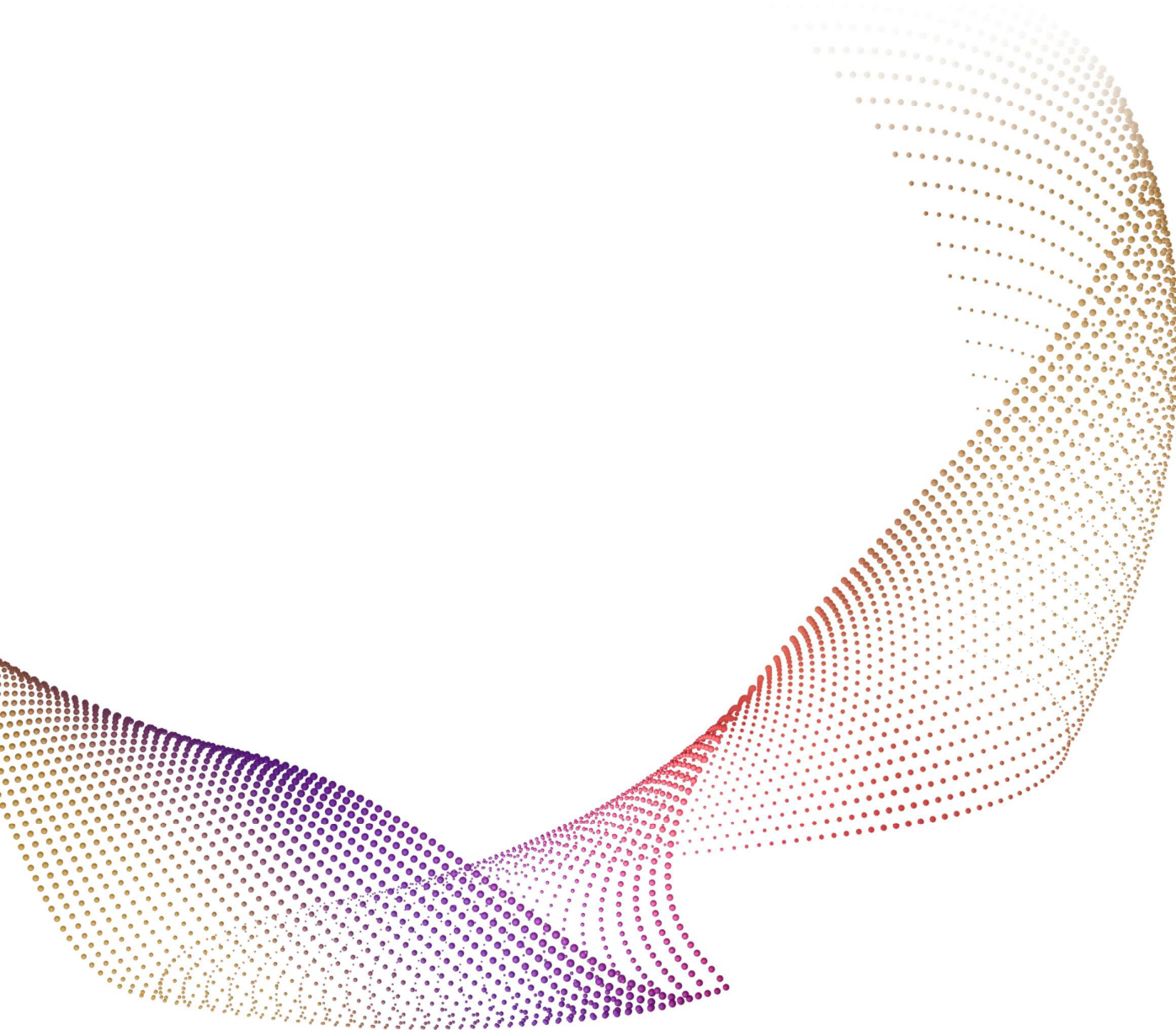
- 14.1 Our business does not operate in isolation. Value is created through collaboration and partnerships. Beyond traditional risks in supply chains, an ESG lens examines the holistic nature of the third parties, from how they source raw materials to how they treat workers and comply with accepted standards.
- 14.2 A workforce health and safety incident, labour dispute or allegation of corruption, can have serious impacts on stakeholders up and down the value chain. Evaluation of ESG is part of our on-boarding due diligence prior to entering into a trading relationship and is also reviewed periodically in line with the Procurement policy and our supply chain management procedures.
- 14.3 The Group's procurement policy contains the Supplier Code of Conduct. It is our aim that our suppliers incorporate ESG within their processes and policies, but we recognise that organisations, dependant on their corporate structure, size, location and industry sector, will be at various stages of embedding ESG within their businesses. The Supplier Code of Conduct sets out our expectations for development of their ESG Strategy, the requirement for compliance with the Modern Slavery Act (2015), awareness of human rights issues, compliance with the Equality Act (2010), elimination of all forms of discrimination, controls to protect against fraud and corruption, and a requirement to have a whistleblowing policy in place with a clear escalation process. We also require safeguards and security of systems and data protection.
- 14.4 Compliance with our ESG requirements form part of our Standard Terms and Conditions for all new suppliers onboarded since the introduction of the Procurement Policy in Autumn 2022. This is being rolled-out to all suppliers as contracts are renewed.
- 14.5 We undertake risk assessments of the value chain in line with the Risk Management Framework. We seek to mitigate risk exposure and build the resilience of our business and are working with our supply chain to understand and minimise all risk, including ESG risk in the value chain.

## 15. Interaction of ESG within Policies

- 15.1 ESG is to be considered across ALL GROUP POLICIES.
- 15.2 Policies sit within the appropriate area of the business but, following the introduction of the Policy Governance Framework, all policies must identify where they contribute to the Group's ESG strategy (see Evelyn Partners Governance Framework).
- 15.3 This policy requires approval in accordance with the Policy Governance Framework by the Board ESG Committee.

## 16. Policy and history of revisions

Version	Date Approved	History & revisions	Revisions by:	ESG approver
1	7/07/2022	New ESG Policy introduced in line with ESG Strategy	Doulla Panayi	Group Executive Committee
2	14/12/2023	Annual Review and Change in Group Governance following replacement of Corporate Responsibility Committee with GEC and formation of Board ESG Committee.	Doulla Panayi, reviewed by the Environment Steering Committee	Group Executive Committee
3	05/03/2025	Annual review with updates in governance, progress on strategy and regulatory updates	Doulla Panayi, reviewed by the Environment Steering Committee	Group Executive Committee
Policy owned by:		Group Executive Committee		
Policy approved by:		Group Board ESG Committee		



#### Disclaimer

Issued by the Evelyn Partners group of companies (the "Group") which comprises Evelyn Partners Limited and any subsidiary of Evelyn Partners Limited from time to time. Further details about the Group are available at [www.evelyn.com](http://www.evelyn.com).

Registered in England at 45 Gresham Street, London EC2V 7BG. No. 08741768

T: 020 7131 4000

E: [info@evelyn.com](mailto:info@evelyn.com)

[www.evelyn.com](http://www.evelyn.com)

**Evelyn Partners Limited.**

45 Gresham Street, London EC2V 7BG.

© Evelyn Partners Limited 2022

**evelyn**  
PARTNERS