WALTER SCOTT

> BNY MELLON | INVESTMENT MANAGEMENT

DIVERSITY, EQUITY & INCLUSION (DE&I) POLICY

1 INTRODUCTION

Walter Scott is committed to a culture built on openness, respect, and opportunity for all. To deliver on this commitment, we know how important it is to have policies and procedures in place that support and champion diversity, equity and inclusion. We also know that policies and procedures can only do so much; we all have a part to play in making Walter Scott a positive, welcoming, and engaging place to work.

2 WHAT DE&I MEANS AT WALTER SCOTT

We are committed to fostering a culture that values diversity at every level. We strive to create and maintain our positive environment where everyone feels welcomed, valued and respected, and everyone who works at Walter Scott has the equal chance to fulfil their potential.

We define diversity, equity and inclusion as follows:

Diversity - the range of human differences that inform our individual perspectives.

Often these differences are obvious (for example race and gender) and are known as demographic diversity. Other forms of diversity are not obvious (for example sexual orientation, belief, neurological differences and cognitive styles).

Equity - ensuring that processes and programmes are fair and impartial.

People policies and practices ensure that everyone has the same chance to achieve the same outcome.

Inclusion - establishing and maintaining a workplace culture where all employees feel they belong, they are valued and respected and they are given the equal opportunity to contribute and progress.

Leadership is the keystone to inclusiveness. Leadership development assists and encourages leaders to embrace diversity in all its forms and build positive working environments. As with equity, inclusion is supported by people policies and practices.

3 OUR COMMITMENTS

Walter Scott is committed to:

- Promoting a culture and environment that encourages employees to feel they belong and are given the
 equal opportunity to contribute and progress
- Providing mandatory annual and ongoing training to reaffirm personal accountability
- Implementing and reviewing policies and practices to promote fairness and impartiality so all have the same chance to succeed
- Seeking a diverse group of applicants through recruitment activities
- Community outreach by partnering with organisations seeking to reduce inequality and promote opportunity
- Assessing progress and reporting outcomes to the Executive Management Committee on a bi-annual basis.

Providing equal treatment and opportunity to all creates our healthy culture, helps provide good outcomes for our clients and benefits society.

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4 TAKING RESPONSIBILITY

Overall responsibility for diversity and inclusion at Walter Scott sits with our Executive Management Committee, which subjects all aspects of diversity and inclusion to a half-yearly review. The Committee is tasked with:

- The ongoing review and continuous improvement of our approach to diversity, equity and inclusion
- Promoting an open, respectful, and equal working culture for all our people.

Our Diversity, Equity and Inclusion Working Group reports to the Executive Management Committee biannually and makes recommendations to improve all areas of diversity, equity and inclusion.

Managers are responsible for ensuring a respectful work environment and taking prompt action to prevent discrimination or harassment from occurring.

Ultimately, everyone at Walter Scott has a role to play in ensuring that individuals feel respected and included. The importance of personal accountability is reaffirmed through annual diversity and inclusion training.

5 SPEAKING UP

There is zero tolerance of discriminatory behaviour at Walter Scott. Our Whistleblowing Policy provides a framework for our employees to raise concerns regarding malpractice, including discrimination, bullying or harassment. This policy contains the assurance that any complaint will be heard and promptly investigated. In addition, any person making a complaint will be protected if concerns are raised in good faith.

6 OWNERSHIP

This policy is owned by the Executive Management Committee