

# Impax Inclusive Culture Policy

We believe that the transition to a more sustainable economy is closely linked to the transition to a more equitable society.

Impax's view of diversity is intentionally broad and includes (but is not limited to) gender, race, ethnicity, sexual orientation, disability, culture, religion, age, socioeconomic background, political stance - as well as the importance of intersectionality across these dimensions.

Impax's vision in this area is to continue to build an inclusive, equitable culture where everyone feels they belong, are valued as individuals, and can thrive - bringing all aspects of themselves to work.

## Governance, strategy & implementation

Impax's Inclusive Culture Group is responsible for implementing Impax's strategy around the areas of inclusion, culture, diversity and equity.<sup>1</sup> The Inclusive Culture Group is sponsored by the Chief Executive and a Non-Executive Director. The Group reports to and is accountable to the Senior Leadership Team and the Impax Asset Management Group plc Board.

The Inclusive Culture Group actively works toward the following objectives:

- 1. Inclusive Culture:** to build and promote an inclusive culture at Impax across all facets of diversity, as a way of improving our business success.
- 2. Talent:** to ensure all colleagues receive equitable opportunities throughout each stage of the employee lifecycle, including equitable pay.
- 3. Aspirational goals:** to support Impax's aim that the business reflects the markets in which we operate at all levels of the organisation. Our aspirational goals focus on gender and race/ethnicity (as a measurable proxy for our broader aims), based on merit and performance. We are focused particularly on promotion pathways to the senior employee (Director) level.
- 4. Investment:** to leverage our position as investors that focus on talent management, including our understanding of corporate culture as a potential source of alpha generation
- 5. Impact:** to support organisations that create opportunity for groups that are underrepresented within the investment industry.

The Inclusive Culture Group meets on a quarterly basis for alignment and feedback, and is further supported by the following employee-run sub-groups:

- Strategy
- Communications & Partnerships
- Inclusion

<sup>1</sup> **Diversity** can be defined as the presence of difference within a given context, such as an organisation.

**Equity** means people have fair access, opportunity, resources and power to thrive. The goal is to achieve greater fairness of treatment and outcomes.

**Inclusion** can be described as the actions taken to understand, embrace and leverage the unique strengths and facets of identity for all individuals so that they feel welcomed, valued and supported.

From UNPRI [PRI | Diversity Equity and Inclusion](#)



## Talent: our colleagues

### Recruitment

Our hiring practices and instructions to recruitment firms are to include, where practicable, female and/or racial/ethnic minority candidates for every open role, on the basis of merit and performance and relevant legal obligations.

### Career and talent development

We provide career and talent development programmes for all employees and aim to remove any barriers to progression based on gender, ethnicity or other aspect of diversity.

### Compensation

We remain committed to pay equity at all levels across the business and engage in compensation benchmarking exercises to achieve this. We are committed to the continued examination of in-level gender pay differences, including using robust external pay benchmarking data and report our gender pay gap on an annual basis.

### Raising concerns

Impax does not tolerate unfair treatment under any circumstance – this includes but is not limited to bullying, harassment and discrimination. If any employee has been subjected to, or witnessed this behaviour, we encourage them to raise this as soon as possible.

Employees can refer to Impax’s internal policies for further information regarding our approach to these matters.

## Suppliers and partnerships

Impax expects that all its suppliers should take active steps to promote diversity and inclusion in line with best practice and comply with relevant employment laws, regulations and standards.

Impax encourages an inclusive and diverse working environment with equitable opportunities for all workers. All supplier employees must be treated fairly and not discriminated against in any form during their employment.

Suppliers must not discriminate against any employee based on race, age, gender, sexual orientation, union membership, ethnicity, disability, religion, political stance, national origin, veteran or military service status, or marital or pregnancy status during any recruitment or employment practices.

## Industry initiatives

Impax has signed charters with, or is a member of the following organisations, among others:

- CFA DEI Code (USA and Canada)
- Diversity Project
- Invest Ahead (formerly the Thirty Percent Coalition)
- Race at Work
- Toigo Foundation
- UN Women’s Empowerment Principles
- Women in Finance
- Women in Governance
- 30% Club

### Policy Control

Policy owner:	Inclusive Culture Group Co-Chairs
Additional reviewers:	Human Resources, General Counsel
Effective dates:	18 June 2025
Next review date:	June 2026
Modified date:	18 June 2025
Supporting documentation:	N/A