



Human Rights Policy

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redwheel.com

Who we are

Redwheel is an independent investment manager, with 181 members of staff (as of August 2024) including 57 dedicated investment professionals working across 6 independent teams. We manage \$17.6bn for our clients, with global offices in London, Miami, Singapore, Australia and Denmark.

Our commitment

We are committed to respecting the International Bill of Human Rights and the core labour standards recognised in the International Labour Organisation's Fundamental Principles and Rights at Work. We acknowledge our responsibility to respect human rights and to provide an effective corporate framework to manage business-related human rights abuse issues within Redwheel, consistent with the United Nations Guiding Principles on Business and Human Rights.

As a [signatory](#) to the UN Global Compact, we support the 10 Principles of the UNGC on Human Rights, Labour, Environment and Anti-Corruption and are committed to making the UNGC and its principles part of the strategy, culture and day-to-day operations of our company and engaging in collaborative projects which advance the broader development goals of the UN, particularly the Sustainable Development Goals.

This policy addresses our commitment to respect and to the advancement of international human rights and provides an overview of Redwheel's assessment of the salient human rights issues within our direct operations and how we deliver on our commitments. We are aware that human rights and sustainability is a rapidly developing area and will continue to monitor and adapt our approach in response. This policy will apply to Redwheel's direct operations. We expect our staff, including but not limited to full-time and part-time employees and contractors, to adhere to this policy.

Our impact

Our Human Rights Working Group has conducted a human rights impact assessment to map the most salient issues based on the human rights at risk of the most severe negative impact through Redwheel's activities in its direct operations. As part of this assessment, we identified the inherent risks based on our sector and business activity to narrow down a list of potential human rights impacts.

We assessed the likelihood, severity, impact to people, and irremediability of these issues. Based on this assessment, we then gave each human rights issue a saliency score, from low-to-high, to determine how relevant the issue was to Redwheel's staff. The key issues most salient to Redwheel staff were:

- The potential for discrimination
- Maternity protection, paternity leave, and family leave
- Equality of remuneration

Following our assessment, together with the HR department, the Human Rights Working Group has conducted a review of our policies to ensure mitigative and preventative measures are in place. Redwheel policies that support the delivery of this policy are as follows:

- Staff handbook
- Maternity Policy
- Shared Parental Policy
- Compliance Manual
- Whistleblowing Policy and Procedures
- [DEI Policy](#)
- Modern Slavery Policy & [Statement](#)
- Remuneration policy

Our delivery

With reference to the findings of the Redwheel human rights impact assessment, we have provided an overview of the policies Redwheel has in place to address the key issues identified.

Discrimination, equity and inclusion policy

Our commitment to diversity, equity and inclusion ("DEI") applies to all areas of our business, from recruitment and onboarding to career advancement and learning and development. Providing an inclusive environment that our staff can depend upon is a fundamental objective of our organisation. We have enshrined the concept of treating all people with respect in our conduct rules which are applicable to all staff and provided in our Compliance Manual. To increase awareness of our conduct rules and our principles, our HR and Compliance departments organise training annually for all staff. In 2021, we founded a dedicated group within Redwheel called SEED, run by volunteers with a passion for social equality, the environment, and DEI, to help, advise, and steer initiatives across the organisation and in our local communities. We maintain a DEI Policy and guidance on the procedures in place for staff to report discrimination can be found in our staff handbook.

Support for all staff, including those with family responsibilities

We believe in providing support for all of our workers, including those with family responsibilities, through the different stages of life and events. Our enhanced maternity, shared parental leave and adoption policies offer up to 6 months full-pay. We are also supportive of flexible working and anyone can request a flexible working arrangement from their first day of employment at Redwheel. Our benefits package supports physical, mental, emotional, and financial health and all employees across our global offices are entitled to the same benefits to prevent any regional discrepancies from arising. All of this aims to create a safe environment for our staff to have peace of mind and hopefully feel supported in all aspects of life and not just in their working lives.

Remuneration

Employee compensation is benchmarked annually by our HR team and our Remuneration Committee provides independent oversight to reduce the risk of discrimination. The Remuneration Committee also oversees the implementation of Redwheel's remuneration policies and practices to ensure good governance of Redwheel compensation for staff. Redwheel's commitment to diversity, equity and inclusion applies to all areas of our business, including compensation, and employees are encouraged to raise any pay-related concerns with their line manager or a member of the HR team.

Modern slavery

Redwheel annually publishes a modern slavery statement in line with our responsibilities under the UK Modern Slavery Act 2015. Redwheel does not tolerate modern slavery either within Redwheel or our supply chain and expects all of our employees to carry out their responsibilities with integrity and respect for others. We expect each supplier we engage to be able to verify their commitment to preventing modern slavery and that suppliers agree to our Supplier Code of Conduct where they do not have a published forced labour statement as part of our supplier due diligence process. We have identified key individuals in the business, designated "Supplier Champions", who have been trained on how to identify forced labour risks when dealing with suppliers and how to use our in-house tool, the Greenwheel Forced Labour Risk Index, to help identify high-risk suppliers. Guidance on how to report known or suspected instances of modern slavery is available to all workers in our staff handbook and modern slavery policy.

Whistleblowing policy and grievance process

We take any form of malpractice seriously, including any conduct which adversely affects human rights. Redwheel has a whistleblowing policy available on the company-wide intranet as well as guidance on our formal grievance procedure provided in our staff handbook. Disclosures will be investigated thoroughly and independently; Redwheel expressly prohibits any employee, manager, Director or Partner from taking any retaliatory action against whistleblowers by virtue of having made a disclosure. Where behaviour is unacceptable or business practices fall short of the Company's expectations, Redwheel may take formal action in response, as per our disciplinary procedure.



Governance

This statement has been approved by the Redwheel Executive Committee. The individual Heads of Teams and members of the Executive Committee are responsible and accountable for any risk management within their respective teams. They are supported by Redwheel's relevant committees and functions which report on the operations and running of the business, including the Remuneration Committee and Sustainability Committee (responsible for the establishment of a robust sustainability governance and oversight framework), and the HR department (which works to implement actions to ensure the well-being of staff). Redwheel also has several lines of defence in place to manage conduct risk. Senior managers are expected to foster a culture of compliance with Redwheel's controls framework and provide avenues of escalation for their team members for any risk or compliance issues without recrimination. Redwheel's control functions, which identify, monitor, control and manage risk which could impact human rights issues, also provide support to the Human Rights Working Group. Maintenance of this policy is overseen by the Human Rights Working Group, led by the General Counsel and comprised of individuals from the Legal, Sustainability Strategy, Governance & Policy, Greenwheel and HR teams, which is responsible for updating and reporting annually to the Sustainability Committee on this policy.

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