

Middleton Advisors Environmental, Social and Governance (ESG) Statement

1. Introduction

Middleton Advisors Corporate Limited ('Middleton') is a responsible corporate citizen, and – even as an SME – we recognise that we play a role in supporting the development of a sustainable and prosperous society.

We strive to achieve strong environmental, social and governance performance and regard this as a responsibility, not an obligation. This commitment helps inform every aspect of our business, including how we conduct our day-to-day operations and collaborate with stakeholders.

2. Environmental

We recognise climate change as one of the most significant risks to our world, and so at Middleton we are committed to driving down our energy and carbon impacts.

During the last two years, we have implemented the following initiatives across our offices:

- We have embraced remote-working arrangements and technology, thereby reducing the environmental footprint of our office spaces and lessening the amount of commuting and travel asked of our employees.

- We are conscious that the nature of our business still requires employees to travel extensively around London and the South of England. We have therefore introduced a policy whereby all new/replacement company cars must be electric/hybrid and we provide our London-based employees with low-emission, fuel efficient motorbikes.
- We have joined the Octopus EV 'salary sacrifice scheme' which offers a financial incentive to all employees to switch their vehicle from petrol/diesel to electric.
- We have a 'digital first' approach to correspondence, client reports and promotional materials. When we do have to print hard copies, we use FSC-certified papers and avoid petroleum-based inks.

3. Social

Corporate social responsibility is at the core of our corporate values. Our primary focus is fostering an environment that promotes individual growth and prosperity by making our business an exciting, rewarding, and safe workplace. We also have a long history of supporting the communities in which we operate.

Continued on page 2...

MIDDLETON

A D V I C E

Our social commitments include:

- **Compensation and benefits.** We create inspiring workplaces where people feel valued. We offer competitive compensation and benefits to all full-time employees, including but not limited to private health cover, life assurance cover, income protection cover, gym membership contribution and paid holiday days/sick leave.
- **Culture, engagement and growth.** We create a fun, spirited work environment that rewards collaboration at all levels. We encourage leaders to demonstrate an 'open door policy' and to ensure a 'no blame culture' across the organisation. Our code of conduct, The Middleton Way, addresses these responsibilities and is emphasised in our employee training. We aim to foster personal and professional growth for employees at all levels of the organisation through annual performance reviews, role-specific training, and professional development opportunities.
- **Diversity and inclusion.** We embrace and value diversity in all forms, whether gender, age, ethnicity, sexual orientation, or cultural background. We aim to develop a diverse workforce and maintain a positive workplace environment grounded in fairness and equality and free from discrimination and harassment.
- **Health and safety.** We create and maintain a safe and healthy working environment to ensure safety in our work practices and the occupational health, safety and well-being of employees. As part of this commitment, we offer all full-time employees paid well-being days in addition to bank holidays and their regular paid holiday days.
- **Supporting our communities.** We are committed to supporting the communities where we live and work. This includes financial support via sponsorship of local schools and community events, via direct donations to local charities and by extending work-experience opportunities whenever possible.

4. Governance

Good governance practices are essential to creating and preserving value for our shareholders and other stakeholders. These include a sound approach to corporate governance that aims to comply with all applicable laws, rules, regulations, and policies whilst adhering to our own set of corporate values and business principles.

Our Advisory Board is committed to embedding ESG across our management structure, business policies and procedures with robust measurement and reporting structures in place.

Continued on page 3...

MIDDLETON

A D V I C E

Our governance commitments include:

- **Business risk, compliance, and ethics.** We continue to cultivate a culture of integrity that holds Middleton and our employees accountable to the highest moral and ethical standards. Our code of conduct, The Middleton Way, and compliance policies set the moral and ethical standards that must prevail in all aspects of our business operations. These documents are subject to regular review and are available to all employees within our 'Employee Handbook' – a document that all employees must attest they have read, understood and agree to.
- **Anti-money laundering.** We aim to achieve the highest standard of compliance with anti-money laundering regulations. We retain a dedicated third party – FCS Compliance – to review our internal business processes, advise on best practises, and oversee rigorous training and refresher courses for all full-time employees.
- **Ethics and Human Rights.** We are committed to ensuring a fair workplace for our employees and partners with whom we do business. Our values and business principles encourage honest and direct communication to resolve issues and concerns expeditiously. Middleton holds human rights to be an essential

component of our business. We have a zero-tolerance approach to, and reject all forms of forced or child labour, contemporary slavery and human trafficking.

5. Scope of this Statement

This is Middleton's first ESG Statement. It was approved by the Middleton Advisory Board and published in January 2024.