



# INTEGER WEALTH GLOBAL

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## Policy Document

### ESG Client (Environmental, Social and Governance)

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## 1. Purpose

The purpose of this ESG Client Policy is to ensure that IWG integrates environmental, social, and governance considerations into its client relationships and investment activities. The policy reflects IWG's commitment to:

- Supporting the transition to a sustainable and inclusive economy.
- Aligning with the EU Sustainable Finance Disclosure Regulation (SFDR) and EU Taxonomy Regulation.
- Meeting stakeholder expectations for responsible and ethical business conduct.
- Protecting IWG's reputation and long-term value creation.

## 2. ESG Principles

IWG's ESG framework is built on three pillars:

### Environmental

- Preference for clients who actively reduce carbon emissions, energy usage, and environmental impact.
- Avoidance of clients engaged in activities that significantly harm the environment (e.g., illegal logging, unregulated extractives, unchecked fossil fuel expansion).
- Support for investments in renewable energy, green technology, and circular economy initiatives.

### Social

- Commitment to human rights, fair labour standards, diversity, and inclusion.
- Zero tolerance for clients linked to child labour, forced labour, human trafficking, or discrimination.
- Engagement with clients who support community development and social equity.

### Governance

- Clients must demonstrate sound corporate governance structures, transparent ownership, and ethical business practices.
- Zero tolerance for corruption, tax evasion, money laundering, or opaque structures.
- Preference for clients with clear ESG reporting, board diversity, and responsible executive practices.



### 3. ESG Client Due Diligence

Before onboarding, clients undergo ESG screening and assessment as part of the KYC/KYB process:

- Screening: Clients are screened against ESG risk databases, sanctions lists, and adverse media.
- Questionnaire: Clients may be required to complete an ESG questionnaire outlining their policies and practices.
- Risk Rating: Clients are assigned an ESG risk category (Low, Medium, High).
- Exclusions: Clients in prohibited sectors (e.g., controversial weapons, illegal mining, tobacco, wildlife trafficking) will not be onboarded.

### 4. Ongoing Monitoring & Engagement

- Annual ESG Review: Clients are reassessed annually for compliance with IWG's ESG standards.
- Continuous Monitoring: Adverse media, regulatory breaches, or ESG controversies are monitored in real time.
- Engagement: Where gaps exist, IWG will engage with clients to encourage improvements in ESG performance.
- Exit Strategy: Persistent non-compliance or severe ESG breaches may result in termination of the client relationship.

### 5. Reporting & Transparency

- IWG will report ESG considerations in line with SFDR and relevant EU guidelines.
- ESG factors will be disclosed in fund documentation, client reporting, and stakeholder communications.
- IWG commits to transparency in how ESG principles influence investment decisions and client relationships.

### 6. Roles & Responsibilities

- Board of Directors: Approves ESG policy and monitors compliance.
- ESG Committee: Oversees ESG integration into client due diligence and investment processes.
- Compliance & Risk Teams: Ensure ESG standards are applied during onboarding and ongoing monitoring.
- Client Relationship Managers: Communicate ESG expectations to clients and collect required disclosures.

### 7. Training & Awareness

- Staff will receive annual ESG training, including updates on EU regulations, global best practices, and sector-specific ESG risks.
- ESG awareness will be embedded into client onboarding, investment decision-making, and monitoring procedures.



## 8. Policy Review

- This policy will be reviewed annually to reflect updates in EU sustainable finance regulations, evolving ESG risks, and market practices.

### Annexes (Internal Use Only)

- ESG Client Onboarding Questionnaire
- ESG Risk Assessment Matrix
- Exclusion List of Prohibited Sectors