BCWM

Our Environmental, Social and Governance Statement

BCWM has incorporated the consideration of sustainability, environmental, social and governance ("ESG") risks into the development of its investment advisory process. Additionally, BCWM reviews how such risks may impact client portfolios. The Firm's ethos of wealth preservation and clients' desires to generate sustainable long-term returns empowers portfolio managers to ensure the investment process includes the consideration and management of Principle Adverse Impacts (PAIs), where possible, on sustainability factors which may have an impact on client portfolios.

Responsible Investment

A fundamental aspect of the BCWM client review and decision-making process includes the consideration, discussion and provision of advice concerning ESG investments and sustainability factors. BCWM's deliberations focus on overall suitability factors, to satisfy our clients' principles, needs and objectives.

When providing advice, BCWM considers and explains the PAIs of specific investment types, including the impact on health, safety, society and the environment. It is BCWM's view that, over time, this ESG strategy can generate long-term competitive financial returns, although we ensure that suitable options and alternatives are provided to customers.

During initial contact with clients, BCWM discusses, identifies, and agrees investment objectives. Through this contact and subsequent suitability assessment updates during the lifetime of the client relationship, BCWM will discuss ESG preferences and the PAIs of alternatives. BCWM will advise the client concerning portfolio options, which include exposure to SFDR Article 9 (known as SFDR dark green) and Article 8 (known as SFDR light green) investments. BCWM will also discuss the Principal Adverse Impacts (PAI) of non ESG related investments. BCWM warns the client concerning PAIs, which have negative effects, whether material or likely to be material, on sustainability factors that are caused, aggravated by, or directly linked to specific investment types.

In accordance with specific client preferences, suitability reports and updates, which BCWM will furnish throughout the lifetime of the client relationship, will contain information regarding ESG investments.

BCWM ensures that investment advisors employ a responsible attitude towards client advice and act in accordance with the rules set down in the BCWM Code of Conduct. This code focuses on staff behavior, client interaction, quality of service, conflicts of interest, gifts and entertainment.

BCWM's Remuneration and Inducements policies guard against conflicts of interest, such as the receipt of any commission linked to the sale, or provision of investment recommendation, for a specific product. It is BCWM's policy to maintain remuneration arrangements that, among other things, do not encourage risktaking, including exposure to sustainability risk, that is inconsistent with the client's risk profile.

This policy is kept under content review and any marketing material updated to reflect relevant changes.

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