



Agecroft Partners, LLC. Diversity and Inclusion Policy and Procedures – “Invest in Others”

SUMMARY

Diversity and Inclusion are core values of Agecroft Partners. We are committed to establishing equity in the work place and community no matter race, gender, religion, or sexual orientation. We firmly believe in the celebration of unique perspectives and are committed to fostering diversity and inclusion for historically underrepresented groups in the investment industry.

Agecroft Partners believes that it is our responsibility and duty to cultivate an environment in which all people feel empowered, enabled and supported. We believe that this influence will enhance business activities, relationships and contribute to communal success. Continued efforts to increase intellectual and cultural capital will lead to more informed and inclusive decisions.

Our goal is to be at the forefront of diversity and inclusion leadership, to provide equity to not only our employees, but to the greater industry of which we are a part of. This includes fund managers, investors, service providers, and all other industry professionals.

At the core of Agecroft Partners is the *investment in others*.

PROCESS

Our process follows three critical imperatives under the I.C.E. acronym: Identify Create and Execute.

1. *Identify* the lack of opportunity and representation of certain groups of individuals found within our firm or through the industry as a whole. In order to provide for these communities, the first step is to understand the problem at hand and the benefits of working to solve them. Within the ‘identify’ step, it is important to capture data relative to employee demographic, internal practices and potential areas of concern.
2. *Create* a proactive plan with clearly defined objectives to develop the areas of need. The goal of this plan is to address current practices that do not meet the diversity and inclusion standards set by the firm and to promote greater diversity across the alternative investment industry. This can include amending processes or eliminating them all together. In the ‘create’ step, senior-level management should utilize the data gathered in order to formulate an appropriate plan of action.
3. *Execute* the plan by empowering all individuals within the firm. The success of our diversity and inclusion initiative will directly correlate to firm engagement. Therefore, change will best be seen from top-down. Senior-level management must send a clear and concise message as to the new direction of the firm. Within the ‘execute’ step, it is critical to embrace constructive criticism and create an environment where positive change is supported, encouraged and celebrated. Once the initial procedural change has been made, the most important step is to maintain diligence in sticking to it.

KEY OBJECTIVES

Objective	Specific	Application
Healthy work environment	Create an equitable and supportive environment	Value individuality Maintain policies that work against harassment & discrimination Provide for individual needs of each employee
Workforce diversity	Establish equal employment opportunity and pay	Utilize broad recruiting process Develop and retain diverse leaders Implement uniform hiring and promotional process
Workplace inclusion	Empower employee engagement on all levels	Develop firm-wide collaboration Use Inclusive language Enhance employee engagement
Industry Involvement	Champion diversity and inclusion outside of work	Engage with the local community Support organizations that provide for the underrepresented Educate and empower the next generation
Sustainability and Accountability	Maintain and enhance current practices	conduct a review of current practices at least annually Provide firm wide training programs Set up a system of checks and balances

CONTINUED REVIEW

Agecroft Partners fully recognizes and acknowledges that Diversity and Inclusion policies encompass a long-term time horizon. Our leadership team is committed to the active development of our own internal processes, professional engagements, and industry advocacy and involvement. Our firm-wide policies are reviewed and amended promptly upon change and no less frequently than annually in order to maintain the highest standards of Diversity and Inclusion.

Agecroft Partners is a licensed broker-dealer, registered with the Securities and Exchange Commission (SEC) and is a member of The Financial Industry Regulatory Authority (FINRA), a MSRB registered Municipal Advisor, a member SIPC and a member of The National Futures Association (NFA).