

Annual update submission form – organisations with more than 250 staff⁺

Please complete this form as fully as possible in a Word



document (**NB HM Treasury cannot accept handwritten or scanned entries, or PDFs**). We ask that you undertake reasonable checks to ensure the data in this document is correct before submitting it to us. If you wish to lock or password protect the document, please provide us with the correct password. If you have any queries regarding your submission, please contact us.

Compulsory responses are marked with an asterisk *. The non-compulsory responses provide a suggested framework for both data and narrative reporting, based on feedback from signatories.

The information provided in your response will be aggregated, anonymised and presented in the Annual Review of Charter signatories, to be compiled by our data partner New Financial and published in March 2024 (TBC). HM Treasury's privacy statement can be found as an attachment to the email you received with this form. To read New Financial's data privacy statement, please <u>click here</u>.

The annual review will highlight progress and share best practice in a constructive, positive way (<u>click here</u> to see the most recent annual review). No information will be attributed without the express permission of the relevant signatory. If we do seek this permission, we will contact you in good time ahead of publication.

We want to know about your successes, but also get a true picture of where you have faced challenges. Please be as frank and as open as you can be in your responses, including where a target may not have been met. Note there is no wordcount limit for your responses.

Completed submissions should be emailed to <u>womeninfinance@hmtreasury.gov.uk</u> **before close on September 30**th **2023**. If you are able to send your submission earlier, we encourage you to do so.

†If your company has 250 or less staff in the total workforce, please do not <i>fill out this form and contact wifc@newfinancial.org to request the relevant submission form for smaller organisations.

Section A) Signatory information		INSERT ANSWERS BELOW	
1*	Name of signatory company	Nucleus Group Services Limited	

2*	Please select the sector which best describes the entity to which the Charter applies: (Please copy and paste in the righthand column) Investment management Building society/credit union Financial adviser Fintech Global/investment banking Insurance Life and pensions Market infrastructure Payment systems Professional services UK banking Government/regulator Trade body/association Professional network Recruiter Other (please specify)	Fintech/Life and Pensions
3*	Is Charter signatory FCA/PRA-regulated or does it conduct regulated activities? Yes/No	Yes
4	Location of UK headquarters Town/ city	Salisbury
5	Type of entity to which Charter commitment applies <i>Plc/LLP/Ltd/Subsidiary/Regional division/Other</i> (please specify)	Ltd
6	Nationality of group/parent (If applicable)	England and Wales

Section B) Details of individuals who completed this submission		INSERT ANSWERS BELOW
1a*	Name of individual responsible for completing submission	Jason Gardiner
1b*	Job title	Talent Lead
1c*	Email address	Jason.gardiner@nucleusfinancial.com
1d*	Phone number	07763 528 023
2a*	Name of additional contact for queries related to submission	Alison Longbottom
2b*	Job title	Chief People Officer
2c*	Email address	Alison.longbottom@nucleusfinancial.com
2d*	Phone number	07765 883 347

Section C) Accountable executive		INSERT ANSWERS BELOW	
1a*	Name	Richard Rowney	
1b*	Job title	Chief Executive Officer	
1c*	Email address	Richard.rowney@nucleusfinancial.com	
2a*	Has the AE changed since your previous submission to HMT? Yes/No	No	
2b*	If yes, please explain why	N/A	
3*	Is AE male or female? <i>M/F</i>	М	
4*	Type of role of AE? Revenue-generating/ Support role/Both	Both	
5	Does the AE sit on the exco (or equivalent decision- making group) of the entity that has signed the Charter? Yes/No	Yes	
6	Does the AE sit on the board (if the company has a board) of the entity that has signed the Charter? Yes/No/We do not have a board	Yes	
7*	Please confirm this submission form has been seen and approved by the AE <i>Yes/No</i>	Yes	
8a*	Has the AE undertaken specific actions to support their role as AE? <i>Yes/No</i>	Yes	
8b	If yes to 8a, please provide up to three examples NB: Please see p 21 of the latest annual review <u>here</u> for how New Financial analyses this data and groups AE actions thematically, for example:	Gender balanced shortlisting process when recruiting for new roles in the executive team	
	 strategic focus (eg. responsibility in reporting, driving accountability, reviewing dashboards), dedicating resource (eg. securing budget for networks, improving data capture, creating new DI roles) 	Ongoing strategy to improve culture through our purpose, vision and values Plan and budget in place to facilitate	
	 talent focus (eg. talent reviews, succession planning). 	our Equity, Diversity and Inclusion strategy	

Sectio	on D) Senior management definition	INSERT ANSWERS BELOW
1a*	What is the firm's definition of senior management? (<i>NB this definition must be the <u>same</u> as the senior</i> <i>management population to which your target refers in</i> <i>section F1 and the data provided in section E</i>)	Our board, executive team and certain functional leaders (including certified roles under the FCA's SMCR)
1b*	Which of the following most closely corresponds with this definition of senior management?	Board, Exco and Exco-1

	Board Exco (or equivalent decision-making group) Exco – 1 (i.e. direct reports to exco and exco, as per FTSE Women Leaders definition) Exco – 2 Exco – 3 Other (please clarify)	
2a*	Has this definition changed since your previous submission to HMT? Yes/No	No
2b*	 If yes, please specify the change and why the change has been made. PLEASE NOTE: The WIFC Annual Review lists all signatories that have changed their senior management definition (see p38 of the latest annual review here). Any firms seeking to change their senior management definition in their target deadline year will need to provide senior management data in section E as per their previous definition. 	N/A
3	Why did you choose this definition of senior management?	These roles are the most accountable senior roles in our company, can have the biggest impact and can make decisions.
4	Do you expect this definition to evolve, and if so, how?	No

Section	Section E) Senior management data		INSERT ANSWERS BELOW	
PLEASE • •	NOTE: The data provided in this section should correspond to the senior management population to which your target refers in section F1 and as defined in section D1. If your firm has undergone a change in senior management definition and/or structural change since your last submission, please provide the corresponding data to reflect the change both this year and the previous year for comparison purposes. Any firms seeking to change their senior management definition in their target deadline year will need to provide senior management data in section E as per the previous definition.	2022 (as per previous submission)	2023 (as per this annual update)	
1a*	 Number of staff in total workforce If senior management population is regional or global, the total workforce number should correspond to the same region from which senior management may be drawn 	613	757	

		[
	 If the response to 1a* for 2023 is 250 or less, please do not fill out this form and contact wifc@newfinancial.org to request the relevant submission form for smaller companies. 		
1b	Number of female staff in total workforce	301	376
1c	Female staff as percentage of total workforce Calculation: (1b answer ÷ 1a answer) x 100%	49.1%	48.79%
1d*	Number of staff in senior management population	54	68
1e*	Senior management as percentage of total workforce Calculation: (1d answer ÷ 1a answer) x 100%	8.81%	8.98%
1f*	Number of female senior managers	20	27
1g*	Female senior managers as percentage of total senior management Calculation: (1f answer ÷ 1d answer) x 100%	37.03%	39.71%
1h	Number of female senior managers from ethnic minority background	Unknown	0 (of 51% of female senior managers who completed our demographic survey)
1i	Female senior managers from ethnic minority background as percentage of total senior management (<i>please</i> <i>disaggregate by ethnic group where possible/appropriate</i>) <i>Calculation:</i> (1h answer ÷ 1d answer) x 100%	Unknown	0% (of 51% of female senior managers who completed our demographic survey)
2	Female representation on board as percentage (where applicable)	33.33%	30%
3	Female representation on executive committee as percentage (where applicable)	16.66%	33.33%
4*	Please provide the date to which the data in this submission relates DD/MM/YY	29/09/2022	01/09/2023
5*	Do you collect data on the representation of any other diversity strand in the female senior management population? Please provide detail where possible. (See p18 of the latest annual review <u>here</u> for how New Financial has previously presented this data)	Yes, we launch company-wide survey this yea 51% participati female senior r population.	demographic r and have had ion from our

Section	r F) Headline senior management target(s)	INSERT ANSWER	S BELOW
	 The target should be as per your previous submission. If your organisation has changed the target and/or deadline year, please enter this in the "New target" column (NB this target must be based on the <u>same</u> senior management population defined in section D and the senior management data provided in section E) PLEASE NOTE: The WIFC Annual Review lists all signatories that have changed their target, including listing the previous and new targets (see p35-37 of the latest annual review <u>here</u>). Any signatories seeking to change their target or deadline in the deadline year of their original target will be held accountable in the Annual Review against their original target and deadline. 	Target (as per previous submission)	New target (If applicable)
1a*	What is the target(s) for female representation in senior management?	40%	40%
1b*	 What is the deadline? PLEASE NOTE: We will treat the deadline as the end of the given year unless a specific date is provided. If no deadline is specified, your organisation will be held accountable against the target every year in the Annual Review. 	31/12/2022	31/12/2023
1c*	What is the region to which the target applies (if applicable)?	Whole organisation	Whole organisation
2*	Why did you choose this target? Please explain approach to target setting.	We've made good progress towards our target of 40% female representation within our senior manager population and believe we can fully achieve our target by the end of the year.	Despite a high level of business transformation and new, additional headcount joining the business, we've seen strong trend progress towards our 40% target and believe we can achieve it for the first time in 2023.

If you have multiple headline targets, please answer 3 and/or 4 for each target as relevant.

3a*	 Have you have met your target(s) with 2023 deadlines during this reporting period? Yes/No PLEASE NOTE: The WIFC Annual Review lists all signatories that have hit their target (see p7-8 of the latest annual review <u>here</u>). 	No
3b*	 If no to 3a, please explain why and set out any plans to achieve the target. PLEASE NOTE: The WIFC Annual Review lists all signatories that have missed their target and why (see p9, p33-34 of the latest annual review here). 	Appendix 1
If your	deadline is in the future (2024 and onwards), please answer a	question 4.
4a*	Have you met your target early? Yes/No	No
4b*	Are you on track to meet your target (based on your own rationale for interim progress)? Yes/No	Yes
4c*	Please explain how you measure interim progress against a future deadline.	We conduct a monthly data analysis to gauge the effectiveness of our implemented initiatives and review our progress against set targets.
4d*	If the answer to 4b* is no, please explain why	N/A

Section G) A	ctions undertaken to achieve targets	INSERT ANSWERS BELOW
und PLE. See Fina ther	 ase list and briefly explain the top three actions bertaken (or planned) to achieve target(s). ASE NOTE: p13-17 of the latest annual review <u>here</u> for how New ancial analyses this data and groups actions matically, for example: Retention and promotion (eg. female leadership programmes, succession planning initiatives, mentoring and sponsorship), Embedding D&I into BAU (eg. diversity data dashboards, criteria in scorecards, accountability of leadership) Behaviour and culture (eg. learning and development programmes, use of networks, updating policies) Recruitment (eg. diverse shortlists/interview panels, working with headhunters/recruiters, focus on job ads, market mapping) 	Appendix 2

1b*	 How is your organisation monitoring progress measuring the impact enforcing implementation of these actions? This can be quantitative, eg. setting targets, a comply or explain approach; or qualitative, eg. employee engagement survey results 	 Monthly review of female representation data Bi-annual people engagement survey results Annual gender pay gap reporting
1c*	Have you reviewed the actions mentioned in 1a/b to ensure they are inclusive to women across all diversity strands? Please provide details where possible.	Yes – our ED&I strategy aims to support several diversity strands, as well as gender, and we take female intersectionality across other diversity areas into consideration.
1d*	 What actions has your organisation taken to monitor potential impacts of remote/hybrid working on women at your organisation (where relevant)? Please provide details where possible. (See p19-20 of the latest annual review <u>here</u> for how New Financial has previously presented related data on hybrid working) 	We've supported our leaders with guidance and training on how to support their people working in a distributed and hybrid way. We've also released an internal '#WeAreNucleus' guide which contains a narrative around wellbeing, inclusion when working remotely and how to effectively collaborate when working remotely. Our people leaders hold regular 1-to-1s with their people where we encourage conversation around flexibility and co-creation of working arrangements, as well as wellbeing and flexible working.
1e	Are there any new areas of action for your organisation this year? If so, what are they and what inspired them?	Yes – three key activities that have taken place this year are the establishment of our Women @ Nucleus inclusion network, inspired by the reforming of our ED&I strategy as one of our core networks, a piloted coaching initiative available for women to encourage career development and our first strategic partnership between The Verve Group and our Nucleus Foundation (more on both in Appendices below).

Section H) Senior executive pay linked to gender diversity targets		INSERT ANSWERS BELOW
1a*	Do you have a link between targets for female representation and pay?	No

	Yes/ No	
1b*	If no, are you planning to introduce a link to pay in the coming year?	No
1c*	If no to 1a and 1b, please explain why	Due to the significant structural changes to our organisation, as well as our executive team and board, and the focus on harmonising our operating model and reward offering, the decision has been made to not link targets for female representation and pay for now. Targets still remain in place linked to this Charter, our gender pay gap and sustainability target, which we will hold ourselves accountable to. We are committed to revisiting the targets linked to pay approach in the future.
2*	 How is pay for the senior executive team linked to the Charter target(s)? Please provide details of mechanism for link to pay: eg. part of quantitative or qualitative measures or both; if diversity targets are part of a balanced scorecard, indicate how many other criteria are on the scorecard the percentage of pay to which the diversity target criteria applies whether pay is linked to individual diversity criteria or group level criteria, or both 	N/A
3*	Date from which link to pay took/ will take effect MM/YY	N/A
4a*	Has the mechanism for the link to pay changed since your previous submission to HMT? Yes/No	N/A
4b*	If yes, please explain	N/A
5a*	Has the link to pay been effective? Yes/ no/ too early to tell	N/A
5b*	If no, please explain why	N/A
5c	Where possible, please explain what "effective" means to your organisation.	We want Nucleus to be a place where our people can do their best work and we recognise that in order to do this our people need to be

	eg. a signal that diversity is part of executive's day jobs/ a business issue, has led to the desired outcome of achieving targets, incentivised appropriate actions	their authentic selves. Our activity in this area has been driven by our de- sire to win in the marketplace. This is not a box-ticking thing, it's a com- mercial imperative. It isn't about be- ing PC, it's about being future rele- vant and durable. Our ED&I strategy is anchored in our commercial strategy and sponsored by our Chief Financial Officer, Mike Regan, with much of the work being driven by our people and executive
6*	To whom does the link to pay apply? eg. Board Exco (or equivalent decision-making group) Exco – 1 (i.e. direct reports to exco and exco, as per FTSE Women Leaders definition) Exco – 2 Exco – 3 Other (please clarify, eg people managers, all colleagues)	team working together.

Secti	ection I) Webpage dedicated to WIF Charter INSERT ANSWERS BELOW	
1*	Company URL where annual update is/will be published PLEASE NOTE: All Charter signatories are required to publish an update on their progress towards their target on their company website by Dec 31 st 2023 .	https://nucleusfinancial.com
2a*	 Please provide the text for the annual update you intend to publish on your website below. HMT's minimum requirements for the update are: the target and deadline (as per the answers to Section F 1a/1b of this submission form) level of female representation in senior management (as per the answers to Section E 1g of this form), including the date of the data (eg. "as of September 2023") whether or not the signatory is on track to meet its target (as per the answers to Section F 4b of this form) historical datapoint(s) for female representation for comparison (eg at time of joining the Charter) 	Appendix 3

 This must go live on your website by December 31st 2023. Once you have published your update, please email womeninfinance@hmtreasury.gov.uk to confirm and provide the website link if different to your answer to 1 above. If your organisation does not publish an annual update on its website by the deadline, HMT will follow up in January to ask why this has not been published. (See p-24 of the latest annual review here for how New Financial has previously presented this data) 	
Best practice would be for firms to publish their annual update on their website in the format "When we signed up to the Charter in XXX DATE, we had XX% female representation and our target was XX% by XXXX DATE. As of XXXX DATE we have XX% female representation in senior management. We believe we are/are not on track to meet our Charter target of XX% by our deadline of XXXX." HMT also encourages signatories to include a brief narrative statement explaining progress over the past year and expectations for the coming year.	

Appendix 1

Please explain why (the target has not been achieved) and set out any plans to achieve the target.

This year we've been making steady progress towards our target of 40% female representation within our senior leadership group. With an overall headcount increase this year of 144 people (including 14 new senior leaders) we've had the opportunity to improve representation of women at senior leader level. We're happy to report that we have increased this representation to 39.71%. However, we still have work to do and with a continued focus on inclusion and diversity initiatives at all levels across the group, we are confident we can hit our target by the end of the year.

[Plans outlined below]

Appendix 2

Please list and briefly explain the top three actions undertaken (or planned) to achieve target(s).

Women @ Nucleus network

As part of the reform of our Equity, Diversity and Inclusion strategy underway this year, we're currently developing inclusion networks. The aim of our inclusion networks is a grass-roots approach to inclusion where our internal communities drive and promote change through initiatives and projects – designed and proposed by the groups themselves, with support from an overarching ED&I steering committee. Our first inclusion network to launch has been Women @ Nucleus, established in May 2023. The focus of the group is to advocate for and champion the learning, development and progression of women at all levels across Nucleus. This network will be a key group in developing actions that support increasing our female representation at senior leader level.

Targeted learning initiatives

We're currently piloting our first female-only development initiative, specifically focused on coaching. The course has been run across a number of weeks with an initial group of women from across the business engaging in the course, which covers topics like dealing with imposter syndrome, navigating office politics and developing your personal brand. We'll gather feedback and insight from the pilot group once the course finishes and are excited to move forward with next steps on broadening this type of learning to the wider business.

Leadership development

This year we're launching our first internal leadership programme. For our pilot year, we will have a defined eligibility criteria with limited spaces on the programme, however, are committed to a gender-balanced approach when designing cohorts for the programme. This includes gender-balanced cohorts who will embark on the programme together, but also the overall numbers for year 1 will be an even split of men and women. This will ensure there is a considered approach to ensuring women at Nucleus have access to the right learning and development to help them be successful in their roles, as well as experience learning that will help them develop into the future.

Appendix 3

Please provide the text for the annual update you intend to publish on your website below.

At Nucleus, our purpose is to help make retirement more rewarding for our customers, with a vision to become Best Loved Platform for our Advisers.

Part of this is ensuring we have the best people and teams working with us to generate really great outcomes for our customers and their Advisers. We also owe it to ourselves and the industry to ensure we are playing our part in creating a fair, balanced and transparent financial services industry.

More diversity means broader experience, a diverse set of perspectives and a better collective ability to problem-solve. It correlates to being more representative of our customer groups, which supports areas like product development. Nucleus is committed to being activists for inclusion within our culture so that we can extinguish exclusion. We want to make a difference to humans – not just the humans of Nucleus or our industry, but the humans in the communities we live and work in. It's not a tick box exercise; inclusion and diversity is embedded in our culture and everything we do.

This year we've been making steady progress towards our target of 40% female representation within our senior leadership group. With an overall headcount increase this year of 144 people (including 14 new senior leaders) we've had the opportunity to improve representation of women at senior leader level.

We're happy to report that we've increased female representation at senior leader level to 39.71% - the closest we've ever been to our target of 40%.

However, we still have work to do and with a continued, equitable focus on inclusion and diversity initiatives at all levels across the group, we are confident we can hit our target by the end of the year.

This year we're reforming our Equity, Diversity and Inclusion strategy (sponsored by our CFO, Mike Regan) with an aim to be more intentional about how we make Nucleus a more diverse and inclusive place to work. From a diversity perspective, we'll be focussing our attention on four key areas:

- Recruitment
- Policies and benchmarking
- Employee engagement
- Leadership and growth

This will enable us to create a more diverse organisation through targeting our processes that have high potential to improve diversity, as well as create more diversity internally at different levels, for example, women in senior leadership roles.

The inclusion strand of our strategy focuses on the establishment of four inclusion networks, which are:

- Women @ Nucleus network
- LGBTQ+ network
- Cultural diversity and ethnicity network
- Disability and health network

The aim of our inclusion networks is to create space for community, innovation and equitable actions that will instigate positive, targeted change throughout the business. Much of this work will be driven by our people and executive team working together towards our shared goals. Our approach is co-created with our people and what they want to focus on.

Here are some of the ways we've captured data, listened to our people and generated solution-focused ideas to support the creation of our ED&I strategies this year:

- Our bi-annual people engagement survey
- Gender pay gap report analysis
- Ongoing monitoring of demographic data
- Established networking groups (menopause awareness, Women @ Nucleus)

The most inspiring aspect of our inclusion efforts are that it is almost entirely driven by our people - by their wish to be activists and not by-standers. We believe high performance happens when we are authentic, adult and inclusive so we encourage the people of Nucleus to focus on whatever the things are that matter to them. Whilst ED&I has executive level sponsorship our most powerful activity has come from our people. For example:

Women @ Nucleus network

As part of the reform of our Equity, Diversity and Inclusion strategy taking place this year, we're currently developing inclusion networks. The aim for our inclusion networks is a grass-roots approach to inclusion where our internal communities drive and promote change through initiatives and projects – designed and proposed by the groups themselves, with support from an overarching ED&I steering committee. Our first inclusion network to launch has been Women @ Nucleus, established in May 2023. The focus for the group is to build a community focused on the learning, development and progression of women at all levels of the business across Nucleus. This network will be a key group in developing actions that support increasing our female representation at senior leader level.

Nucleus Foundation

This year, the Nucleus Foundation celebrated its official charity status approval. The foundation was set up and funded by Nucleus to equitably support members of the communities we live and work in. We were proud to announce our first official partnership this year with The Verve Group. The foundation will support their mission to empower and enable financial planners through an initiative that will recruit and train ten women as professional qualification-level financial planners.

Targeted development initiatives

We're currently piloting our first female-only development initiative, specifically focused on coaching. The course is running across a number of weeks with an initial group of women from across Nucleus engaging in an externally facilitated coaching programme, which covers topics like dealing with imposter syndrome, navigating office politics and developing your personal brand. We'll gather feedback and insight from the pilot group once the course finishes and are excited to move forward with next steps on broadening this type of learning to the wider business.

As a business moving through swift periods of growth and change our immediate focus has been set to building strong foundations for our people and aligning our business to a unified vision and purpose. Our inclusion and diversity agenda is woven through our commercial strategy - the only way we will win in the marketplace is to ensure we continue to build diverse teams and have an equitable approach to talent acquisition, as well as providing excellent quality of opportunity internally for our people to thrive, grow and develop at Nucleus.

Some highlights from our most recent people engagement survey told us that:

- 93% of our people feel they have meaningful ways to stay connected when working remotely or flexibly
- 87% of our people feel they can be their authentic self at work
- 84% of our people feel Nucleus values inclusion and diversity

We don't take inclusion and diversity lightly – it's not just the right thing to do, it's a commercial imperative for Nucleus to be relevant, future-focused and a place where people are proud to work. We are proud to be a signatory to the Women in Finance Charter and are committed to supporting the growth, progression and development of women at Nucleus and in our industry.