



Women in Finance Charter

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 2025 (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 click here.

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>wifsubmissions@hmtreasury.gov.uk</u> **before close on September 30 2024**. 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** fill out this form and contact New Financial <u>wifc@newfinancial.org</u> to request the relevant submission form for SME organisations.

Sect	ion 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 Plc/LLP/Ltd/Subsidiary/Regional division/Other (please specify)	Ltd
6	Nationality of group/parent (If applicable)	England and Wales

Section	on B) Contact information	INSERT ANSWERS BELOW
1a*	Name of individual responsible for completing submission	Jo Eccleston
1b*	Job title	Reward & Benefits Partner
1c*	Email address	jo.eccleston@nucleusfinancial.com
1d*	Phone number	07929 087 718
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

3	Name, job title and email address of any additional contacts at your organisation who should receive Charter information	
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? M/F	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 Yes/No	Yes
8a*	Has the AE undertaken specific actions to support their role as AE? Yes/No	Yes
8b	If yes to 8a, please provide up to three examples NB: Please see p 21 of the latest Annual Review here for how New Financial analyses this data and groups AE actions thematically, for example: • strategic focus (eg. responsibility in	Gender balanced shortlisting process when recruiting for new roles in the executive team. Plan and budget in place to facilitate our
	reporting, driving accountability, reviewing dashboards), • dedicating resource (eg. securing budget for networks, improving data capture, creating	Equity, Diversity and Inclusion strategy, with a dedicated Women at Nucleus Network.
	new DI roles) talent focus (eg. talent reviews, succession planning).	Partnership with the Verve Foundation to sponsor the financial planning training of a women only cohort to encourage more women to have a career in financial planning.
		Leveraging our technical teams to publish insights on the gender pension

	gap, and host adviser sessions on how to
	address the gap.

Section	on D) Senior management definition	INSERT ANSWERS BELOW
1a*	What is the firm's definition of senior management? (NB this definition must be the <u>same</u> as the senior management population to which your target refers in section F1 and the data provided in section E)	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 (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)	Board, Exco and Exco-1
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 p37 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, have decision making responsibilities and can have the biggest impact.
4	Do you expect this definition to evolve, and if so, how?	No

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 	2023 (as per previous submission)	2024 (as per this annual update)

•	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.		
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 If the response to 1a* for 2024 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.	757	1024
1b	Number of female staff in total workforce	376	525
1c	Female staff as percentage of total workforce Calculation: (1b answer ÷ 1a answer) x 100%	48.79%	51.27%
1d*	Number of staff in senior management population	68	73
1e*	Senior management as percentage of total workforce Calculation: (1d answer ÷ 1a answer) x 100%	8.98%	7.12%
1f*	Number of female senior managers	27	31
1g*	Female senior managers as percentage of total senior management Calculation: (1f answer ÷ 1d answer) x 100%	39.71%	42.46%
1h	Number of female senior managers from ethnic minority background	0 (of 51% of female senior managers who completed our demographic survey)	0 (of 40% of female senior managers who completed our demographic survey)
1i	Female senior managers from ethnic minority background as percentage of total senior management (please disaggregate by ethnic group where possible/appropriate) Calculation: (1h answer ÷ 1d answer) x 100%	0 (of 51% of female senior managers who completed our demographic survey)	0 (of 40% of female senior managers who completed our demographic survey)
2	Female representation on board as percentage (where applicable)	30%	30%
3	Female representation on executive committee as percentage (where applicable)	33.33%	25%

4*	Please provide the date to which the data in this submission relates DD/MM/YY	01/09/2023	31/07/2024
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 p19 of the latest Annual Review here for how New Financial has previously presented this data)	Data we collect i orientation, ethr	emographic survey. ncludes sexual

Section	F) Headline senior management target(s)	INSERT ANSWERS B	ELOW
	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 same senior	Target (as per previous submission)	New target (If applicable)
	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 p34-36 of the latest Annual Review here). 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. 		
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.	31/12/2023	31/12/2024
1c*	What is the region to which the target applies (if applicable)?	Nucleus	Nucleus
2*	Why did you choose this target? Please explain approach to target setting.	We've seen strong progress this year and are proud to achieve our target for the very first time since joining the charter.	We're very proud of the work we've done to achieve our target and hope to

			maintain this going forward. However, our business is going through a high level of transformation and is likely to continue to see additional headcount joining the business via acquisitions which may affect our figures for the coming year. We will continue to take action to achieve our targets and maintain a gender split at Senior level in
16			line with gender bias in the industry.
	leadline has passed or is in 2024, please answer question ave multiple headline targets, please answer 3 and/or 4 f		vant.
3a*	Have you have met your target(s) with 2024 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 here).	Yes	
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, p31-33 of the latest Annual Review here).	N/A	
If your o	leadline is in the future (2025 and onwards), please answ	er question 4.	
4a*	Have you met your target early? Yes/No	Yes	
4b*	Are you on track to meet your target (based on your own rationale for interim progress)?	N/A	

	Yes/No	
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

Sectio	n G) Actions undertaken to achieve targets	INSERT ANSWERS BELOW	
1a*	Please list and briefly explain the top three actions undertaken (or planned) to achieve target(s). PLEASE NOTE: See p13-19 of the latest Annual Review here for how New Financial analyses this data and groups actions thematically, 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)	See Appendix 1	
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 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 p20 of the latest Annual Review here 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. We are currently working on introducing hybrid charters across the business so that teams can develop ways of working that mutually benefit and represent everyone on the team. 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. Where issues are identified that are impacting remote/hybrid working women at Nucleus, we empower people leaders to make changes to ensure that everyone can perform at their best.
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 - our first strategic partnership between The Verve Group and our Nucleus Foundation (more on both in Appendices below). Yes - Focus on understanding the gender pension gap and providing some information on how people can make up the difference.

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? Yes/ No	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. 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	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 their authentic selves. Our activity in this area has been driven by our desire to win in the marketplace. This is not a box-ticking activity, it's

		a commercial imperative. It isn't about the optics; it's about being future relevant and durable. Our ED&I strategy is anchored in our commercial strategy with much of the work being driven by our people and executive team working together.
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)	N/A

Section I) Webpage dedicated to WIF Charter		INSERT ANSWERS BELOW
1*	Company URL where annual update is/will be published	https://nucleusfinancial.com
	PLEASE NOTE: All Charter signatories are required to publish an update on their progress towards their target on their company website by Dec 31 2024. Approval from HMT is not needed before publishing.	
2a*	Please provide the text for the annual update you intend to publish on your website below.	See Appendix 2
	 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 2024") 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) 	
	PLEASE NOTE:	
	 This must go live on your website by December 31 2024. Signatories do not have to seek approval from HM Treasury before publishing. 	

- Once you have published your update, please email wifsubmissions@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, or if the update does not meet the minimum requirements outlined above, HM Treasury or New Financial will follow up in January to ask why this has not been published.

(See p-24 of the latest Annual Review <u>here</u> 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 list and briefly explain the top three actions undertaken (or planned) to achieve target(s).

Women @ Nucleus network

As part of the review of our Equity, Diversity and Inclusion strategy undertaken in 2023, we launched four new inclusion networks. The aim of the inclusion networks is a grassroots 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 was 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 is a key group in developing actions that support increasing our female representation at senior leadership level.

Women @ Nucleus create a regular cadence of targeted learning and networking initiatives throughout the year, the focus this year has been on building confidence in addressing imposter syndrome and looking at how we can build personal brand to improve career prospects.

We Are Change programme sponsorship

Despite positive steps forward in recent years, the financial advice industry continues to see a stark difference in the number of women entering the profession. According to the most recent data from the FCA only 16% of regulated financial advisers in the UK are women.

As part of our partnership with the Verve Foundation we've sponsored a second cohort of women to train to become financial advisers through the 'We Are Change' programme. We opened this up to women within Nucleus and have three women as part of the programme.

This initiative provides access and support to women to train as a financial adviser, ultimately increasing the number of women who are financial advisers, which in turn may help more women feel more comfortable seeking financial advice.

Leadership development

In 2023 we launched our first internal leadership programme, Grow Lead Succeed. In our pilot year we focused on the foundational elements of leadership at Nucleus, launching a playbook and associated toolkits which laid the groundwork for our leadership traits and behaviours, skills and knowledge, and approaches to leading people. Later this year we will launch leadership skills development sessions with topics including managing wellbeing through change, building diverse teams and supporting career progression. Throughout these, we will have a focus on how these specific topics impact women in the workplace and give leaders the skills to support and empower women at Nucleus.

Appendix 2

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 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 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're delighted to have achieved our target of 40% female representation within our senior leadership group. With an overall headcount increase this year of 267 people (including 5 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 42.46% an increase on last year's 39.71% - exceeding our target of 40% for the first time.

However, we still have work to do especially with additional headcount joining our business through acquisitions so we will continue to have an equitable focus on inclusion and diversity initiatives at all levels across the group to ensure this target is maintained for the year ahead and beyond.

2023 saw us reforming our Equity, Diversity and Inclusion strategy (sponsored by our CCO, 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 focus our attention on four key areas:

- Recruitment
- Policies and benchmarking

- Employee engagement
- Leadership and growth

This enables 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 to empower our people to drive our strategy forward and be the voice of change within the organisation. These are made up of:

- Women @ Nucleus network
- LGBTQ+ network
- Ethnic and cultural diversity 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. To support our ED&I strategies we use data, such as our annual engagement survey, gender pay gap reporting analysis, and monitoring of demographic data as well as qualitative information from our listening strategy such onboarding and offboarding interviews. 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, particularly those driven by our inclusion networks.

The aim for our inclusion networks is a grassroots 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.

The LGBTQ+ network hosted a powerful and moving panel discussion on the importance of LGBTQ+ inclusion in the workplace and is currently rolling out a campaign around use of pronouns. The Ethnic and Cultural Diversity network has celebrated the global diversity of our group with highlights throughout South Asian Heritage Month and have proposed and had agreed for those from different religious backgrounds to swap out UK bank holidays to ensure they can take leave during their own religious celebrations without dipping into their annual leave allowance. The Disability and Health network is working on a review of internal policies and creating guidance for People Leaders to ensure everyone is empowered to create opportunities and provide vital support for those with a disability or long-term health condition. Of particular significance to the Women in Finance Charter is the Women @ Nucleus network which has hosted multiple panel discussions, networking events and skills development sessions around the topics of imposter syndrome and building a personal brand to support progression goals. Beyond this, as part of our partnership with the Verve Foundation we've sponsored a second cohort of women to train to become financial advisers through the We Are Change programme. We opened this up to women within our own organisation and have three women participating in the training to become a financial adviser. This initiative is important to Nucleus for two reasons, empowering women of Nucleus to develop their skills and progress their careers is imperative to our ED&I goals and supporting more women into careers as financial advisers will empower more women to seek financial advice and become more financially independent and secure. Find out more about the partnership here.

We are committed to continuously improving our approach to equity, diversity and inclusion at Nucleus, keeping abreast of any concerns across the business and ensuring that our people feel a sense of belonging here. Some highlights from our most recent people engagement survey told us that:

- 94% of our people feel they have meaningful ways to stay connected when working remotely or flexibly.
- 91% of people agree that if they need help, they're comfortable asking for it.
- 88% of our people feel the right wellbeing support is available, should they need it.
- 85% of people feel they can be their authentic self at work.
- 82% 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.

Note: The figures do not include the recently acquired business of Third Financial due to them not being integrated into our Nucleus group at present.