



NEXIS
WORLDWIDE

CORPORATE SOCIAL RESPONSIBILITY POLICY

Organisation	Nexis Worldwide
Policy owner	Kate Bohn, Director
Version	1.0
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Applies to	All directors, contractors and representatives acting on behalf of Nexis Worldwide Limited

1. Introduction

Nexis Worldwide is a specialist financial services advisory and consulting firm. We work with boards, CIOs and executive teams navigating technology, risk and delivery in highly regulated environments. We believe that doing business responsibly is not separate from doing business well — it is the same thing.

This Corporate Social Responsibility (CSR) policy sets out our commitments across four pillars: ethical conduct, our people, the environment, and the communities and clients we serve. It applies to all directors, contractors and anyone representing Nexis Worldwide.

We publish this policy alongside our Anti-Bribery & Corruption Policy and our Modern Slavery & Human Trafficking Statement. Together, these documents reflect how we expect to conduct ourselves — not as a compliance exercise, but as a genuine expression of what we stand for.

We recognise that CSR means different things to different organisations. For a firm of our size and focus, it means being honest about what we can and cannot commit to, doing those things consistently, and raising our ambitions as we grow.

2. Our four CSR pillars at a glance

Pillar	Our commitment
Ethical conduct	Operating with integrity, transparency and zero tolerance for bribery, corruption, modern slavery and financial crime.
Our people	Creating an inclusive, equitable environment where every individual is treated with dignity and given the opportunity to grow.
Environment	Minimising our environmental impact through conscious operational choices, proportionate to the nature of our business.
Society & sector	Using our position in financial services to advocate for inclusion, responsible innovation and better outcomes for the people the industry serves.

3. Ethical conduct and business integrity

Financial services is a trust-based industry. The clients we work with — boards, regulators, founders, transformation leaders — rely on us to give honest, considered advice. Our ethical commitments are the foundation of everything else in this policy.

3.1 Zero tolerance for bribery and corruption

We will not offer, receive or facilitate any form of bribe or improper payment. This is set out in detail in our Anti-Bribery & Corruption Policy, which applies to all directors, contractors and third parties acting on our behalf.

We note that the financial services sector has seen significant regulatory attention on financial crime in recent years. The FCA's £29 million penalty against Starling Bank in 2024 for failings in financial crime controls — where internal measures did not keep pace with growth — is a reminder that compliance frameworks must be proportionate, functioning and actively maintained, not just documented.

Industry context

The FCA fined Starling Bank £29 million in 2024 for "shockingly lax" financial crime controls, having opened over 54,000 accounts for high-risk customers without adequate process. This illustrates how the pace of growth and the rigour of compliance must move together — a principle we apply to our own operations and hold our clients to when advising on transformation.

3.2 Transparency and professional standards

We will conduct all client engagements with honesty, objectivity and clarity. We will not knowingly misrepresent our capabilities, experience or the conclusions of our advisory work. Where we are uncertain, we will say so.

We will not take on engagements where a conflict of interest cannot be adequately managed, and we will disclose actual or potential conflicts promptly.

3.3 Data and confidentiality

Our advisory work frequently involves access to sensitive information — board papers, regulatory submissions, technology architectures, personnel matters. We treat all client information with the same rigour we would expect for our own. We comply with UK data protection law, including the UK GDPR, and maintain appropriate controls on information handling, storage and disposal.

4. Our people

Nexis Worldwide operates as a lean, high-expertise business. Our people — however they engage with us — are the entirety of what we offer clients. How we treat them matters.

4.1 Equality, diversity and inclusion

We are committed to equality of opportunity and to building an inclusive working environment in which every individual is treated with fairness and respect, regardless of age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race, religion or belief, sex or sexual orientation, as protected under the UK Equality Act 2010.

We take diversity seriously not as a reporting requirement, but because the evidence is clear. Monzo's 2024 Diversity and Inclusion Report highlighted that building diverse teams is directly linked to better customer outcomes — their median gender pay gap fell from 8.1% to 6.3% as representation in technical roles increased, demonstrating that inclusion and commercial performance are not in tension. Macquarie Asset Management, where our Director has held senior roles, sets an organisational tone through its Code of Conduct based on the principles of Opportunity, Accountability and Integrity — principles we share.

Industry benchmark — Monzo 2024 D&I Report

Women represent 66% of Monzo's Board and 49.2% of their overall team. Their median gender pay gap fell from 8.1% to 6.3% between 2023 and 2024, driven by increasing the proportion of women in technical roles. Monzo was named Company of the Year at the 2025 British Diversity Awards — evidence that sustained, structured investment in inclusion produces measurable results.

Our Director, Kate Bohn, personally delivered 50/50 gender parity in the talent pipeline for Lloyds Banking Group's Commercial Banking Markets division in 2017. This was not a communications exercise — it was a structural change, achieved through deliberate hiring, sponsorship and pipeline management. It is the standard we hold ourselves to.

4.2 Dignity and respect at work

We will not tolerate discrimination, harassment, bullying or victimisation of any kind. This applies to all working relationships — with employees, contractors, clients and partners. Anyone who has a concern about conduct is encouraged to raise it without fear of retaliation.

4.3 Fair engagement and payment

We are committed to engaging contractors and partners fairly, paying promptly and in accordance with agreed terms, and ensuring that anyone working with or for Nexis Worldwide does so on clear, lawful terms. We will not engage in practices that disadvantage individuals through ambiguous or exploitative arrangements.

4.4 Wellbeing

We recognise that the nature of advisory and transformation work — often high-stakes, deadline-driven and conducted under regulatory pressure — can be demanding. We are mindful of the wellbeing of those who work with us and seek to create working arrangements that are sustainable, not just deliverable.

5. Environment

As a professional services advisory firm with a small operational footprint, our direct environmental impact is limited. We are not a manufacturer, we do not operate physical premises at scale, and our supply chain is short. We do not claim equivalence with the net zero commitments of large financial institutions, and we think it is important to be honest about that.

What we do commit to is acting with environmental consciousness in the choices we make, and using our influence — as advisors to financial services firms — to encourage responsible practice.

Industry benchmark — Macquarie Group FY2024

Macquarie Asset Management committed to net zero Scope 1 and 2 financed greenhouse gas emissions by 2040 and contributed A\$67m to community and social impact programmes in FY2024 through its Group Foundation. Their approach — reducing operational emissions, supporting client decarbonisation, and setting measurable targets — represents the direction of travel for large-scale FS firms. We draw on this as a reference point when advising clients on ESG governance and transformation.

5.1 Our operational commitments

- We operate digitally by default, minimising paper use and preferring electronic communication, documentation and reporting
- We choose energy-efficient approaches to travel — preferring video conferencing over in-person meetings wherever the quality of the engagement permits
- Where physical travel is required, we favour rail over air for domestic and short-haul journeys
- We will not procure goods or services from suppliers where there is a known, unaddressed environmental harm associated with their operations
- We will review and update our environmental commitments annually as our business grows

5.2 Climate and ESG in our advisory work

Sustainability reporting and disclosures are becoming mandatory across the financial services sector. The EU Corporate Sustainability Reporting Directive (CSRD) entered its first reporting period in January 2025, and the FCA has signalled that ESG ratings providers will come under a new regulatory regime from June 2028. These are not distant developments — they are shaping the governance and technology decisions our clients are making now.

Where clients engage us on governance, technology or transformation programmes, we will incorporate ESG considerations as a matter of course, not as an add-on. Responsible transformation includes asking how the changes being made will affect people, the environment and long-term sustainability — not only whether they will meet the technical or commercial brief.

6. Society and the financial services sector

Financial services is not a neutral industry. The decisions made inside banks, asset managers and fintechs — about who gets access to credit, how risk is priced, whose data is used and how transformation is delivered — have real consequences for real people. We take that seriously.

6.1 Financial inclusion

We support the principle that financial services should be accessible, fair and designed with the end user in mind. The FCA's Consumer Duty, which came into force in 2023, places a positive obligation on regulated firms to deliver good outcomes for retail customers. This is the regulatory floor — the direction of travel should be higher.

Monzo's social programme offers a practical example of what financial inclusion looks like in practice: their gambling block feature — the first of its kind when launched in 2018 — has since been adopted by approximately 90% of UK banks and used by over 700,000 Monzo customers. Innovation in the service of vulnerable customers is exactly the kind of work we seek to support and encourage in our advisory practice.

Industry example — Monzo gambling block

Launched in 2018 as the first banking tool of its kind, Monzo's gambling block allows customers to self-exclude from gambling transactions. Over 700,000 customers have used it, and it has since been adopted by approximately 90% of UK banks. It is now referenced in the government's gambling reform programme. This is human-centred design applied to financial services — the kind of outcome-focused innovation we advocate for in our advisory work.

6.2 Responsible innovation

We work with fintechs, banks and accelerators at the intersection of TradFi and DeFi. This is an environment where the pace of change can outstrip the maturity of governance. The risks are real — not only the regulatory risk of moving too fast, but the social risk of deploying technology that excludes or disadvantages people who are already underserved.

Our advisory work is grounded in the conviction that bold ideas can be made safe to pursue. That means building governance into transformation from the beginning, not retrofitting compliance at the end. It means asking who bears the risk when things go wrong. And it means being honest with clients when a proposed approach — however technically elegant — creates more risk than it resolves.

6.3 Diversity in financial services leadership

The financial services sector continues to face well-documented challenges on gender and ethnic diversity, particularly at senior and board level. We will not simply observe this from the sidelines. Our advisory work actively includes assessment of whether transformation programmes are designed in ways that widen or narrow opportunity — in hiring, in promotion, in access to development.

We also recognise the value of visible role models. Through speaking engagements, advisory board memberships and public commentary, we use our platform to advocate for an industry that better reflects the communities it serves.

7. Related policies

This policy forms part of a suite of documents that set out how Nexis Worldwide conducts itself:

- Anti-Bribery & Corruption Policy — our zero-tolerance approach to bribery in all its forms, including gifts and hospitality guidance, third-party responsibilities and reporting obligations
- Modern Slavery & Human Trafficking Statement — our annual statement under the Modern Slavery Act 2015 setting out due diligence, risk assessment and reporting

All three documents are available on our website at katebohn.com and are reviewed annually.

8. Responsibilities and review

Kate Bohn (Director) is responsible for the maintenance, implementation and annual review of this policy. As Nexis Worldwide grows, additional responsibilities may be allocated and this policy will be updated to reflect those changes.

Any person working with or on behalf of Nexis Worldwide who becomes aware of an actual or potential breach of this policy is encouraged to raise the matter promptly. Concerns will be treated seriously, investigated appropriately and handled with discretion. We will not tolerate retaliation against anyone who raises a concern in good faith.

This policy will be reviewed annually. The next scheduled review date is May 2027. We are committed to raising our ambitions — in each successive version of this document we will report on what has changed, what we have learned, and where we intend to go further.