

# Diversity, Equity, & Inclusion Policy ("DEI")

## **1. POLICY INTRODUCTION:**

At CFI Partners, LLC and its wholly owned subsidiary, CFIP Capital Solutions, LLC (collectively, "CFIP" or the "Firm"), we recognize that creating a diverse, equitable, and inclusive organization is a strategic business imperative. As a minority-owned investment management firm, we aspire to ensure that all groups can obtain equal opportunities within financial services. Our objective is not to confer preferential treatment to any group but rather to broadly expand opportunities, ensuring all individuals can fully realize their potential. We firmly believe that diversity of thought, background, and experience strengthens our capability to evaluate risk accurately, identify unique opportunities, and consistently deliver strong returns.

## **2. SCOPE & LIMITATIONS:**

Our DEI Policy and initiatives are designed to ensure compliance with Title VII of the Civil Rights Act and Illinois state employment laws, reflect CFIP's unwavering commitment to equal employment opportunity, and utilize inclusive recruitment, outreach, and employee development strategies. While CFIP believes its DEI initiatives are likely to contribute positively to the Firm's culture and potentially enhance performance or preserve value, we cannot guarantee specific improvements in individual investments or overall firm value.

This policy is applicable across CFIP and is aligned with our Employee Policy and Procedures Handbook and all applicable laws.

## **3. OUR COMMITMENT TO DIVERSITY:**

At CFIP, we firmly believe talent is ubiquitous, but opportunities are not. Therefore, our recruitment strategy encompasses outreach to a wide variety of educational institutions, professional networks, and community organizations.

Our approach focuses on nurturing talent organically. We prioritize hiring at entry-level positions and advancing employees from within, a strategy that not only fosters a consistent culture but also ensures alignment with our core values. We find this practice both efficient and impactful over the long term.

Collaborations such as with The Academy Group (TAG) allow us to identify and engage resilient young professionals, whom we assess based on their qualifications, achievements, and potential. Our internship program, open to all qualified candidates, remains a key pathway for identifying and nurturing emerging talent. In a recent multi-year analysis, more than 90% of our entry-level hires began as interns<sup>1</sup>. This resulted from expansive outreach and rigorous, merit-focused evaluations.

For senior roles, we commit to recruiting from and evaluating a broad candidate pool; however, our final decisions are strictly merit-based and driven by job-specific criteria. This approach ensures diverse perspectives are considered without resorting to quotas or preferences. Our hiring processes seek to rely on clear, objective criteria to minimize the potential for bias and ensure fair assessments of a candidate's strengths, efforts, and achievements. Candidates undergo consistent, competency-based questioning. Interview panels comprising multiple team members offer balanced perspectives, and we thoroughly document all candidate evaluations, seeking to underscore that no hiring decision is intended to factor in protected personal attributes.

#### **4. OUR COMMITMENT TO EQUITY:**

Equity at CFIP means seeking to ensure that every individual employee has a fair and transparent path to career advancement. Employees receive detailed guidance regarding advancement criteria and performance expectations through consistent, transparent communications. Our annual performance review process acknowledges our employees' current performance and potential, allowing us to recognize and reward talent effectively.

Additionally, we offer financial support for ongoing education, leadership training, and mentorship opportunities, making professional development resources accessible to all employees.

#### **5. OUR COMMITMENT TO INCLUSION:**

We understand that true diversity flourishes only in an inclusive culture where everyone feels genuinely welcomed and respected. CFIP emphasizes belonging and collaboration through comprehensive onboarding and ongoing educational workshops on inclusive teamwork and bias awareness. Our Employee Policy and Procedures Handbook includes robust anti-discrimination, anti-harassment, and anti-retaliation policies, and employees have access to confidential channels to raise concerns promptly. Policies such as flexible

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<sup>1</sup> Surveyed period: 2019-2023

working hours, remote work options, and inclusive parental leave accommodate various personal circumstances, further enhancing workplace inclusivity.

All employees must attest to having read the Employee Policy and Procedures Handbook upon joining the Firm and on an annual basis. Annual training is provided to ensure staff are updated with CFIP's policies and any updates or changes that may occur. Training is firmwide and in-person.

## **6. LEGAL COMPLIANCE & SAFE HARBORS**

CFIP is steadfast in complying with federal and Illinois employment laws, including Title VII and EEOC guidelines. While we embrace diversity and inclusion, we categorically avoid quotas, set-asides, or preferential treatment based on protected characteristics. Instead, we expand talent pipelines through broad, inclusive outreach, utilize structured, objective assessments to measure merit, regularly monitor hiring and advancement processes to identify and remove unintended barriers, and offer universally accessible professional development opportunities. This strategic approach harmonizes our commitment to diversity and equity with strict adherence to legal standards.

## **7. POLICY REVIEW:**

We review and update our DEI Policy annually or as required. The Chief Operating Officer, alongside our Responsible Investment Committee, holds primary responsibility for overseeing policy implementation and updates, ensuring continuous alignment with our organizational values and legal obligations.

Since 2024, this policy has been updated primarily to reflect its application to CFIP's wholly-owned subsidiary, CFIP Capital Solutions, LLC.