



DESCRIPTION:

WCM Investment Management is an asset management firm headquartered in Laguna Beach, California. Since 2018, WCM is has been a partial subsidiary of Natixis, a French investment bank. Natixis, in turn, was acquired in 2021 by French banking conglomerate Groupe BPCE. WCM does not provide viewpoint protections for its employees but has not publicly terminated business relationships based on views or beliefs. The CEO of Natixis has signed the CEO Action for Diversity & Inclusion pledge, though the corporation has not used its reputation or corporate funds for ideological purposes. The firm does adhere to the UN Principles for Responsible Investing and implement a "Green Weighting Factor," though neither of these policies explicitly deny services to specific industries or businesses. For these reasons, WCM Investment Management receives a Medium Risk rating.

Corporate Weaponization

Has denied service to customers, suppliers, or vendors due to their political views or religious beliefs OR corporately boycotts, divests, or sanctions regions, people groups, or industries. **Medium Risk**

WCM Asset Management is a signatory of the Principles for Responsible Investment, incorporating ESG issues into investment analysis, decision-making, and other business practices (1)(2). WCM has specific funds that do not invest in portfolios with significant stakes in high-risk industries such as firearms or gambling, though this is specific to those particular funds and not reflective of a larger company policy (3). However, neither WCM Asset Management nor its parent company Natixis have publicly fired customers, suppliers, or vendors based on political views or religious beliefs (4).

Charitable giving (including employee matching programs) policies or practices discriminate against charitable organizations based on views or religious beliefs. **Medium Risk**

WCM does not have an independent charitable giving program. Natixis will match donations "to organizations that promote the common good and benefit the general welfare of the community. By definition, this excludes organizations that promote single sectarian, denominational, or religious activities" (1).

Employment policies fail to protect against discrimination based on political affiliation/views and/or religion. **High Risk**

WCM does not publish a nondiscrimination policy (1). Natixis' CEO signed the CEO Action for Diversity & Inclusion pledge, which includes a commitment to promote DEI through bias education training in the workplace (2). However, Natixis does not provide viewpoint protections for its employees (3).

Corporate Governance and Public Policy

Uses corporate reputation to support ideological causes and/or organizations hostile to freedom of expression. Medium Risk

Natixis has released a “social and environmental responsibility” statement, committing the United Nations’ Sustainable Development Goals (SDGs). This includes a “Green Weighting Factor” whereby the investment firm publishes and manages its allocation into “green” investments (1)(2). This metric does not explicitly require denying services to “brown” investments. Natixis has released statements in solidarity with the LGBTQ community (3).

Uses corporate funds to advance ideological causes, organizations, or policies hostile to freedom of expression. Lower Risk

WCM and Natixis have (1)(2).

Uses corporate political contributions for ideological, non-business purposes. Lower Risk

WCM does not operate a PAC at this time (1)(2). The Natixis US Holdings PAC donates in a bipartisan manner in accordance with business interests (3)(4).

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