



Inclusion and Diversity Policy

At Granahan Investment Management, we are dedicated to operating as a diverse and inclusive company. We believe that by embracing diversity and creating opportunities for all members of our team to excel, we are able to better connect with our customers, understand the market, and produce world-class business results.

We treat all employees and prospective candidates with dignity, respect, and as equals regardless of age, religion, race, ethnicity, sexual orientation, or gender identification. We celebrate our differences and strive to ensure that everyone at GIM can bring their whole selves to work.

When hiring for internal or outsourced positions, we leverage a variety of platforms and cast a wide net to build a diverse pool of applicants. It is always our goal to hire the best candidate for any position. We commit to removing names, pronouns, and any other identifying factors when researching potential hires to ensure we are hiring the best person possible for the job. When hiring or promoting, we work to ensure that our focus is on an individual's aptitude and experience. Internal promotions are based solely on an employee's performance, using information gleaned from reviews and attainment of annual goals set by the company and the employee.

We make our commitment to inclusion clear to our employees during the onboarding process and throughout their careers with us. Violations of our diversity and inclusion principles by any members of our team will be rectified according to our employee policies and disciplinary actions. Where it is determined that violations of our diversity and inclusion principles have occurred, we will act promptly to impose such corrective action as is necessary, including disciplinary action where appropriate. Please note that while this policy sets forth our goals of promoting a workplace of inclusion, the policy is not designed or intended to limit our authority to discipline or take remedial action for workplace conduct which we deem unacceptable.

Practicing Inclusion and Diversity

At GIM, we have outstanding women leadership represented at multiple levels and in multiple departments, starting with our own CEO. Three members of our investment team (1 portfolio manager and 2 senior traders), as well as our attorney, are women. Three out of 8 of our Managing Directors, as well as 2 out of 4 members of our Ireland-based UCITs Fund Board, are women.

GIM is also a proud founding member of the Wall Street Diversity Accelerator Program, which provides summer internships and mentoring to underrepresented minority students. Through this program we provide exposure to the asset management business and create opportunities for underrepresented populations to make inroads into the industry. Over time, we aim to increase pipelines of diverse candidates in hiring pools.