



THE EB PARTNERSHIP



EB Wealth

The EB Partnership London Limited Governance Plan

March 2023

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Section 1

Introduction

Our Governance Plan sets out the requirements and guidance laid down by the Financial Conduct Authority.

This document sets out the steps the firm will take to ensure that it is compliant with the FCA rules. The plan will be reviewed at least annually and revised during the year if the compliance monitoring undertaken during the year shows that any weaknesses have occurred.

Risk Mitigation

Principle 3 – Management and Control of the FCA Rulebook states:

“A Firm must take reasonable care to organise and control its affairs responsibly and effectively, with adequate risk management systems.”

The company will work in partnership with both the FCA and its own staff to ensure the best implementation of the rules for the benefit of its clients.

This document details the arrangements put in place by The EB Partnership London Limited ('EBP') to ensure its compliance with the above principle, records the identified risks faced by the firm and outlines the procedures that have been adopted to reduce those risks to an acceptable level.

Section 2

Background / Firm Information

The firm was established initially as an LLP by Charlie McCall, Neil Morrow and Kai Tang in May 2012 and incorporated as a limited company in April 2014, owned equally by Charlie McCall, Neil Morrow and Kai Tang. In May 2017, EB Holdings Limited was established to facilitate the buy-out of Neil Morrow. EB Holdings Limited is owned 50% by Charlie McCall and 50% by Kai Tang.

EBP is a wholly owned subsidiary of EB Partnership Holding Limited ('EBH'). EBH is not a trading company.

In January 2021, The EB Partnership London Limited became an Appointed Representative of Bond Wealth Ltd, which is authorised by the FCA (number 778835). EBP is also registered with the FCA, number 585548.

In February 2016, EB Wealth ('EBW') was established as a trading style of EBP. EBP's primary business is employee benefits, predominantly pensions and protection products, for corporate clients. EBW's primary business is undertaking regulated investment business, predominantly pensions and ISAs, for individual clients.

The firm's office and registered address is:

Apsley House
176 Upper Richmond Road
LONDON
SW15 2SH

Locum Arrangements

The firm has a sufficient number of advisers for all areas of authorisation and no locum is required.

Key Personnel and Internal Controls

Directors / Advisers

Name	Individual Reference Number (IRN)	Permissions
Charlie McCall	CFM01044	Investment and Protection Adviser
Kai Tang	KYT01003	Investment and Protection Adviser

The firm's Compliance (SMF16) and Money Laundering (SMF17) Director is Richard Bendell, Bond Wealth Ltd.

Administration Staff

- Harveen Sikka – Client Manager
- Amber Moon – Senior Client Manager
- Tina Bouziani – Client Manager
- Nicky Khan – Compliance
- Alisha Swinton – Marketing and Administration

Job descriptions for all employees are available in the Staff Folder on SharePoint.

Section 3

The Company's Culture / Vision

The EB Partnership London Limited provides advice to both corporate and individual clients. Revenues received are split approximately 30/70 respectively, with the responsibilities of employees split accordingly. EBP aims to continue to grow its business in both areas and as it does so, envisages taking on another qualified advisor to assist with servicing our clients satisfactorily.

Section 4

Authorisation

Our firm reference number (FRN) is 585548.

The firm is authorised to conduct the following activities:

<p>Permission</p> <p>An authorised firm will have permission to provide certain regulated products and services.</p>
<p>Client Money</p> <ul style="list-style-type: none">• This firm cannot hold client money. It may be able to control client money if it has the necessary requirements.
<p>Requirements</p> <p>Requirements are rules placed on the firm that apply to all of the financial services activities that it can operate.</p> <ul style="list-style-type: none">• Article 3 MiFID exempt firm <p>Advising on investments (except on Pension Transfers and Pension Opt Outs)</p>
<p>Customer Type</p> <ul style="list-style-type: none">○ Commercial○ Retail (Investment)○ Retail (Non-Investment Insurance) <p>Investment Type</p> <ul style="list-style-type: none">○ Certificates representing certain security○ Debenture○ Government and public security○ Life Policy○ Non-investment insurance contracts○ Personal pension scheme○ Rights to or interests in investments (Contractually Based Investments)○ Rights to or interests in investments (Security)○ Share○ Stakeholder pension scheme○ Unit○ Warrant <p>Limitation</p> <ul style="list-style-type: none">○ Rights to or interests in (both). <p>Advising on Pension Transfers and Pension Opt Outs</p>
<p>Customer Type</p> <ul style="list-style-type: none">○ Retail (Investment) <p>Investment Type</p> <ul style="list-style-type: none">○ Life Policy○ Personal pension scheme○ Stakeholder pension scheme○ Unit <p>Limitation</p> <ul style="list-style-type: none">○ Rights to or interests in (both).

Advising on P2P agreements

Customer Type

- Commercial
- Retail (Investment)
- Retail (Non-Investment Insurance)

Limitation

- Limited to carry on regulated activity.

Arranging (bringing about) deals in investments

Customer Type

- Commercial
- Retail (Investment)
- Retail (Non-Investment Insurance)

Investment Type

- Certificates representing certain security
- Debenture
- Government and public security
- Life Policy
- Non-investment insurance contracts
- Personal pension scheme
- Rights to or interests in investments (Contractually Based Investments)
- Rights to or interests in investments (Security)
- Share
- Stakeholder pension scheme
- Unit
- Warrant

Limitation

- Rights to or interests in (both).

Making arrangements with a view to transactions in investments

Customer Type

- Commercial
- Retail (Investment)
- Retail (Non-Investment Insurance)

Investment Type

- Certificates representing certain security
- Debenture
- Government and public security
- Life Policy
- Non-investment insurance contracts
- Personal pension scheme
- Rights to or interests in investments (Contractually Based Investments)
- Rights to or interests in investments (Security)
- Share
- Stakeholder pension scheme
- Unit
- Warrant

Limitation

- Rights to or interests in (both).

Consumer Buy to Let

The firm does not have permission to advise on consumer buy to let.

Advising on P2P Arrangements

The firm does have permission to advise on P2P arrangements.

Retirement Adviser Directory

The firm has registered with the Money Advice Service (MAS), Unbiased and is included on the Retirement Adviser Directory.

Client Classification

EBP has adopted a policy of classifying all clients as retail clients.

- A retail client is one which is not a professional client or eligible counterparty.
- If a firm provides services relating to trustees, Trust Funds, including Child Trust Funds (CTFs), (except a personal recommendation relating to a contribution to a (CTF), the client is treated as a retail client, even if they would otherwise fall into a different category.

Each client will be issued with a client agreement and this confirms the client status as a retail client.

Consumer Credit Permissions

Having reviewed our activities it has been decided that there is no requirement to extend our permissions to include Consumer Credit permissions.

Type of Advice

The firm operates an independent advice proposition.

Pension Transfer Advice

The firm holds specialist permissions to advise on and arrange Occupational Pension Transfers. However, as a firm, we have chosen not to advise on Final Salary Pension transfers.

Long Term Care

The firm does not provide advice in relation to long-term care.

Non-Investment Insurance Business

EBP has opted to promote pure protection under COBS rules and will continue to do so. This requires the firm to make a recommendation based on client specific circumstances and confirm the suitability of the product to the client. This is achieved by carrying out a full Fact Find (satisfying the 'know your client' principle), assessing the need for the product and then issuing a client specific illustration and suitability report.

Passporting

The firm is not authorised to passport for either IMD or MiFID business.

Appointed Representatives

The firm does not have any Appointed Representatives, but is itself an Appointed Representative of Bond Wealth Ltd.

EBP is subject to the same compliance procedures and monitoring arrangements as Bond Wealth Ltd.

Section 5

Prudential Matters

Bond Wealth Ltd, our Principal Firm, is required to hold £20,000 by the FCA as the basic capital adequacy and has been classed by the FCA from a prudential perspective as a Flexible Portfolio Firm.

Bond Wealth Ltd requires EBP to trade as a solvent business, without taking on debts that are not covered by the firm's current assets.

Professional Indemnity Insurance

The firm has professional indemnity insurance in place through Bond Wealth Ltd. The insurance is provided by Howden.

Accounting Procedures

The firm's day-to-day accounting records are handled by Charlie McCall.

The accounting reference date is 30 April.

Section 6

Clients

The target audience is predominantly made up of corporates and their employees and high net worth individual clients.

Our individual wealth clients can be categorised into advised and non-advised clients. An individual becomes a client once a Client Agreement has been signed and is considered to be an ongoing client whilst any recurring fees are payable to EBW.

The firm has approximately 215 active clients to whom corporate employee benefit services or general financial planning is offered.

The growth in the number of clients is mainly achieved via recommendation and referral.

All clients are categorised as Retail Clients.

Vulnerable Client Policy

The Financial Conduct Authority (FCA) has developed the following definition to guide work in this area:

“A vulnerable consumer to be someone who, due to their personal circumstances, is especially susceptible to detriment, particularly when a firm is not acting with appropriate levels of care.”

Our policy on clients in vulnerable circumstances recognises the FCA principles for businesses underpinning the fair treatment of vulnerable customers:

Principle 2: skill, care and diligence	A firm must conduct its business with due skill, care and diligence
Principle 3: management and control	A firm must take reasonable care to organise and control its affairs responsibly and effectively, with adequate risk management systems
Principle 6: Customer’s interests	A firm must pay due regard to the interests of its customers and treat them fairly
Principle 7: Communications with clients	A firm must pay due regard to the information needs of its clients, and communicate information to them in a way which is clear, fair and not misleading
Principle 8: Customers, relationships of trust	A firm must take reasonable care to ensure the suitability of its advice and discretionary decisions for any customer who is entitled to rely upon its judgement

We have also taken into account the FCA identification of the four drivers of vulnerability: health (e.g., severe or long-term illness, mental health issues), life events (e.g., bereavement, new caring responsibilities), resilience (e.g., low / erratic income) and capability (e.g., poor literacy or numeracy skills, no or low access to help / support).

EBP normally classifies the following clients as those with vulnerable circumstances, although recognises that a client’s circumstances may change. We continually evaluate and assess whether any of our clients may be considered vulnerable through our discussions with them and our understanding of their circumstances:

Health-related

- those with cognitive impairment
- those with sensory issues e.g., impaired vision or hearing
- those suffering from a long-term / severe illness or physical disability
- those suffering from addiction

Life events

- the unemployed, especially those who may have been recently made unemployed after a long time in full time employment
- those who have just entered retirement
- those experiencing stress / pressures e.g., recent divorce, job loss, bereavement, etc
- armed forces personnel returning from abroad

- anyone who has recently become responsible for an unusually large amount of money in relation to their normal levels of income e.g., trustees or beneficiaries of a trust
- those suffering domestic abuse
- those who have caring responsibilities
- first-time or inexperienced clients
- first-time house buyers
- older people
- the young

Resilience

- those with low resilience to cope with financial or emotional shocks
- those with low financial resilience
- those with inadequate or erratic income
- those in debt or on low incomes, where investment losses would be disproportionate

Capability

- those with poor or non-existent digital skills
- those with little or no understanding of English
- those with no or low access to help / support

Other

- those susceptible to financial abuse / scams, including from family members or an attorney not working in their best interests

Spotting the signs of financial abuse:

Expresses high levels of concern about where money is coming from	Less access to or control over their money	Prioritises buying items or paying bills that may not seem essential	Can't access basic necessities
Partner is making it difficult for them to work from home	Leaves work when they liked their job	Additional paid or unpaid work and/or caring with no help from their partner	Struggling to stay socially connected
Unexplained or unusual withdrawals	Unusual changes in financial documents	Urgent changes in significant financial arrangements	Missing belongings or personal property from home

Our Treatment of Clients in Vulnerable Circumstances

We will ensure that sufficient client information is gathered and recorded to allow the adviser to identify any potentially vulnerable or inexperienced clients. Where the adviser feels that the client may have vulnerable circumstances, the file will evidence the additional care taken to ensure that the risks and features of the recommended product are fully understood.

We aim to treat any client according to their vulnerable circumstances and will not discriminate against such clients. We will give all such clients the opportunity to have a trusted friend or relative present at the appointment to assist them. This offer will be recorded on the file and the presence of a third party recorded in the Fact Find so that it is clear to a third party viewing the file that the client has been afforded every level of protection.

If our customer is mentally incapacitated and not able to make decisions for themselves, advice will be given to an attorney or court appointed deputy and a full copy of the registered enduring/lasting power of attorney or deputy order will be retained on file. Where the advice is given to the attorney or deputy, the file will evidence that the advice is based on the requirements, circumstances and assumed risk profile of the customer.

Where a client does not consider themselves computer literate, we are able to provide any documents to them by post and we are able to provide in a larger font if required.

As with other clients, we will not provide a report that has new information in it without thoroughly talking through all the salient points. For those clients with a low level of financial knowledge, we will confirm with the client that they have understood the recommendations being proposed and the reasons why. The reports we produce will be written in a style that we believe to be clear and uncomplicated.

Where a client is not mobile, we can conduct most business over the phone and we can arrange to visit the client (within a reasonable distance from the office) if a face-to-face meeting is required.

The above mitigating actions are not exhaustive and our actions will be adapted based on a client's personal circumstances.

RIGHTS & RESPONSIBILITIES

Our responsibilities:

- To abide by the FCA's principles and rules in this area
- To ensure staff are aware of this policy and are adequately trained to identify and deal with clients who are or may appear "vulnerable".
- To support individuals in relation to identified risk and vulnerability.
- To provide a means of reporting any instance where they believe that a client might be in vulnerable circumstances.

Insistent Client Policy

The firm has the following policy for dealing with insistent clients:

- 1) Initial advice is provided in a concise manner, emphasising the need to ensure the client's understanding of the recommendations.
- 2) In the case that the client desires to take another course of action to the one recommended, the adviser will make clear what the risks would be involved with the client's desired route.

- 3) If the client decides to go ahead with their desired course of action, the adviser has the right to refuse to facilitate the transactions. In the event that the adviser does decide to facilitate the transactions, the adviser will ask the client to write back in their own words stating what they want to do. The adviser will then write a further letter to confirm the client's preferred transactions, making clear what the risks are and why they do not recommend this course of action. Where the client's course of action is considered to be unsuitable, we will not amend our initial recommendations or facilitate these transactions.

Remuneration

The firm receives remuneration for advice in differing forms, including:

- Commission (non-investment insurance contracts); and
- Direct fees from clients or facilitation from providers (retail investment products).

Incentive Schemes

The firm has given consideration to the FCA Thematic Review TR14-4 concerning financial incentives.

All our advisers are engaged on an employed basis and each have a contract of employment in place.

Review

Having reviewed our remuneration policy we have concluded that we are not operating an incentive scheme.

Introducers

The firm does not have any formal introducer to whom EBP refers business.

Section 7

Investment Proposition

The firm has established a Centralised Investment Proposition (CIP) covering the following categories: Moderately Cautious, Cautious, Moderate, Moderately Adventurous, Adventurous. The funds within each category of our CIP are predominantly the same (with differing asset allocations), with some minor variations. The key components of each CIP are as follows:

Asset Allocation - once the asset allocation stage is completed, the firm chooses appropriate investments to reflect the various asset classes in the right proportions.

Fund Analysis – when assessing a fund for the CIP portfolios a detailed set of criteria is considered:

- Cumulative and discrete performance and sector quartile rankings

- Volatility, Alpha, info and sharpe ratios
- Costs for access

Monitoring and Reporting

Each client is offered an annual review prior to which the client is requested to complete a further risk-profiling questionnaire so that if their risk profile score has changed, the client can be rebalanced into the more appropriate CIP portfolio.

At 3 monthly intervals, the firm’s investment committee meets to assess the performance of its portfolios and their component funds. The Investment Committee looks for any outperformance - or underperformance - that might need further investigation. Funds are assessed using the same criteria as in the fund selection process. New quarterly CIP portfolios are created following these reviews. The firm has differing levels of service proposition, which includes a rebalancing service either quarterly, six-monthly or annually. Clients due a rebalance will be rebalanced into the latest available CIP portfolios. If the committee feels it necessary to rebalance other clients into the new portfolios prior to their normal rebalancing date, they will contact them and ask them if they would like to authorise the switch. Minutes of the firm’s investment committee are available on request.

Currently, all active clients are invested (at least in part) into one of the firm’s CIP portfolios. Bespoke investments are also offered e.g., structured products, structured deposits. Going forward, the firm aims to offer a fully bespoke investment plan for those clients who do not wish to invest in one of the firm’s CIP portfolios.

The firm uses a small number of platforms for its CIP portfolios. The preferred platforms / providers, as highlighted in our Terms of Business, are Transact and Fidelity.

Due Diligence

The firm undertakes due diligence in relation to its investment propositions quarterly, specifically reviewing the outcomes of each portfolio and the underlying funds. This is discussed at quarterly Investment Research Meetings and final propositions to changes to the CIP presented to the Investment Committee, including the rationale for any changes. Copies of the Investment Committee minutes are available on request.

Research Systems

System	Purpose
Morningstar	Fund Research
Funds Network	Fund Research
Trustnet	Fund Research
Defaqto	Fund / Provider / Fund Research
Ex Web / Iress	Insurance Research

Company’s Ongoing Service Proposition

The firm offers an ongoing portfolio management service to clients. For clients signed up to the ongoing service proposition, the firm offers two discrete levels of service: one for clients who are investing in the CIP only and another for clients who are investing in both the CIP and bespoke products:

Centralised Investment Proposition

	Portfolio Management	Annual Review
TIER 1 Typically for portfolios with a value in excess of £125,000	One fund switch / rebalancing per year included as part of the annual review.	Annual review by telephone or at our offices charged at £500.
TIER 2 Typically for portfolios with a value in excess of £250,000	As Tier 1 + one extra fund switch and rebalancing exercise will be accommodated each year, if required, at no additional cost.	Annual review charges will be waived. The Annual Review meeting may be held at an alternative location convenient to you within a reasonable distance of our offices.
TIER 3 Typically for portfolios with a value in excess of £1,000,000	As Tier 2 + quarterly fund switches and rebalancing will be accommodated whenever necessary at no additional cost.	As Tier 2 + Cash flow analysis where necessary. + Ad hoc advice can also be catered for by prior agreement.

Where bespoke investment solutions are included

	Portfolio Management	Annual Review
TIER 1 Typically for portfolios with a value in excess of £125,000*	One fund switch / rebalancing per year included as part of the annual review.	Annual review by telephone or at our offices charged at £500.
TIER 2 Typically for portfolios with a value in excess of £250,000	As Tier 1	As Tier 1
TIER 3 Typically for portfolios with a value in excess of £500,000	As Tier 1 + one extra fund switch and rebalancing exercise will be accommodated each year, if required, at no additional cost.	Annual review charges will be waived. The Annual Review meeting may be held at an alternative location convenient to you within a reasonable distance of our offices.
TIER 4 Typically for portfolios with a value in excess of £1,000,000	As Tier 3 + quarterly fund switches and rebalancing will be accommodated whenever necessary at no additional cost.	As Tier 3 + Cash flow analysis where necessary. +Ad hoc advice can also be catered for by prior agreement.

Company's Ongoing Service Procedures

EBP provides clients with 3-4 service propositions as per the tables above. The service propositions are based upon the value of a client's portfolio. The service level being offered to a client is reviewed on an ongoing basis and more formally as part of their annual review, including ensuring that the advice, products invested in and costs are still appropriate for them.

All tiers are offered a minimum of one fund switch / portfolio rebalance per year. All clients receive this as part of their annual review. The firm uses a diarised system to ensure that all clients are allocated an annual review.

The firm reviews its CIP every quarter and if changes are made to any of the portfolios, the client list is reviewed to make sure that all relevant clients are offered a fund switch / rebalancing service accordingly.

Process

The process for fund switches / rebalancing differs slightly depending upon whether the client is on the Transact platform or not. In all cases, the option to rebalance / perform a fund switch is discussed during a client's annual review meeting and is included as a recommendation in their annual review report.

Transact

Following the recommendation, the changes are loaded onto the Transact platform and the client is required to log onto the platform to authorise the changes themselves.

Other product providers

Following the recommendation, consent is required either by email or by signing a form. Once consent has been received, the firm makes the changes on the client's behalf.

If the client does not wish to make the recommended changes, a note is made as to the reasons why this has been declined, if known.

Conflicts of Interest

The firm's Conflict of Interest policy is maintained in a separate document and is available on request.

Bribery Act Policy

The firm's Bribery Act policy, which includes the firm's Gifts and Inducements policy, is maintained in a separate document and is available on request.

Section 8

Marketing

EBP does not undertake extensive marketing. Most of the firm's new clients are from recommendations and referrals. The firm is also listed on a search engine: Unbiased.

Financial Promotions

Charlie McCall and Kai Tang co-ordinate Financial Promotions for the firm and these are forwarded to True Potential for comments and guidance, as well as to Bond Wealth Ltd for approval. All Financial Promotions are recorded in the Financial Promotions register.

Section 9

Compliance

Richard Bendell, Bond Wealth Ltd, has overall responsibility for the compliance as the individual with SMF16 Compliance Oversight.

Bond Wealth Ltd and EBP meet quarterly to discuss any changes in EBP's business practices and procedures to ensure they remain FCA compliant.

Bond Wealth Ltd retains True Potential as its sole Compliance Consultants, to whom EBP also has access. On site visits and offsite file reviews are undertaken throughout the year and assistance is provided to both Bond Wealth Ltd and EBP in its key regulatory responsibilities.

Training & Competence

The firm has a separate Training and Competence plan which details how the advisers are supervised.

The firm's overall nominated supervisor is Richard Bendell. Charlie McCall and Kai Tang will act as initial supervisors to any newly recruited Advisers during their induction period.

All employees receive training / updates in relation to regulatory changes and are required to annually sign Staff Declarations confirming their understanding of and adherence to internal policies and the principles of the FCA Codes of Conduct. Refresher training is provided in advance of the Declarations being signed.

Statement of Professional Standing

All of our investment advisers hold a Statement of Professional Standing as follows:

Name	Issuing Body	Renewal Date
Charlie McCall	CII	30 April 2023
Kai Tang	CII	31 December 2023

Professional Standards

The firm is aware that Professional Standards Data returns must be submitted to the regulator within 20 business days of the end of each quarter if there have been any changes to our investment advisers.

Richard Bendell, Bond Wealth Ltd, will ensure the firm complies with this requirement.

Complaints

The Complaints Officer is Richard Bendell (Bond Wealth Ltd), who will handle all complaints on a day-to-day basis.

Anti Money Laundering

Richard Bendell, Bond Wealth Ltd, is responsible for Anti-Money Laundering within the firm.

Best Execution

We maintain a Best Execution policy which is held in the firm's Staff Handbooks and Guides folders on their system.

In addition, each year we will publish in this report the top product providers we have used. Due diligence is performed on providers annually and where we no longer consider current providers to remain suitable, consideration is given to use an alternative provider.

Breaches

Richard Bendell, Bond Wealth Ltd, will maintain a record of material breaches of the FCA Rules. This will contain details of the breach of the Rules that has occurred and any remedial actions that have been taken.

Business Continuity



In the unlikely event of a disaster or unforeseen interruption to normal business activity, EBP is required to have appropriate plans and arrangements in place. Whilst EBP may not be able to stop such an occurrence; adequate continuity planning has been considered in our Business Continuity Plan, which is stored in our Staff Handbook and Guides folder on our systems.

Reporting

Richard Bendell, Bond Wealth Ltd, has day to day responsibility for maintaining records and submitting regulatory information.

Sign Off

Approved by:

Signature & Director Name		
Date	08/03/2023	08/03/2023



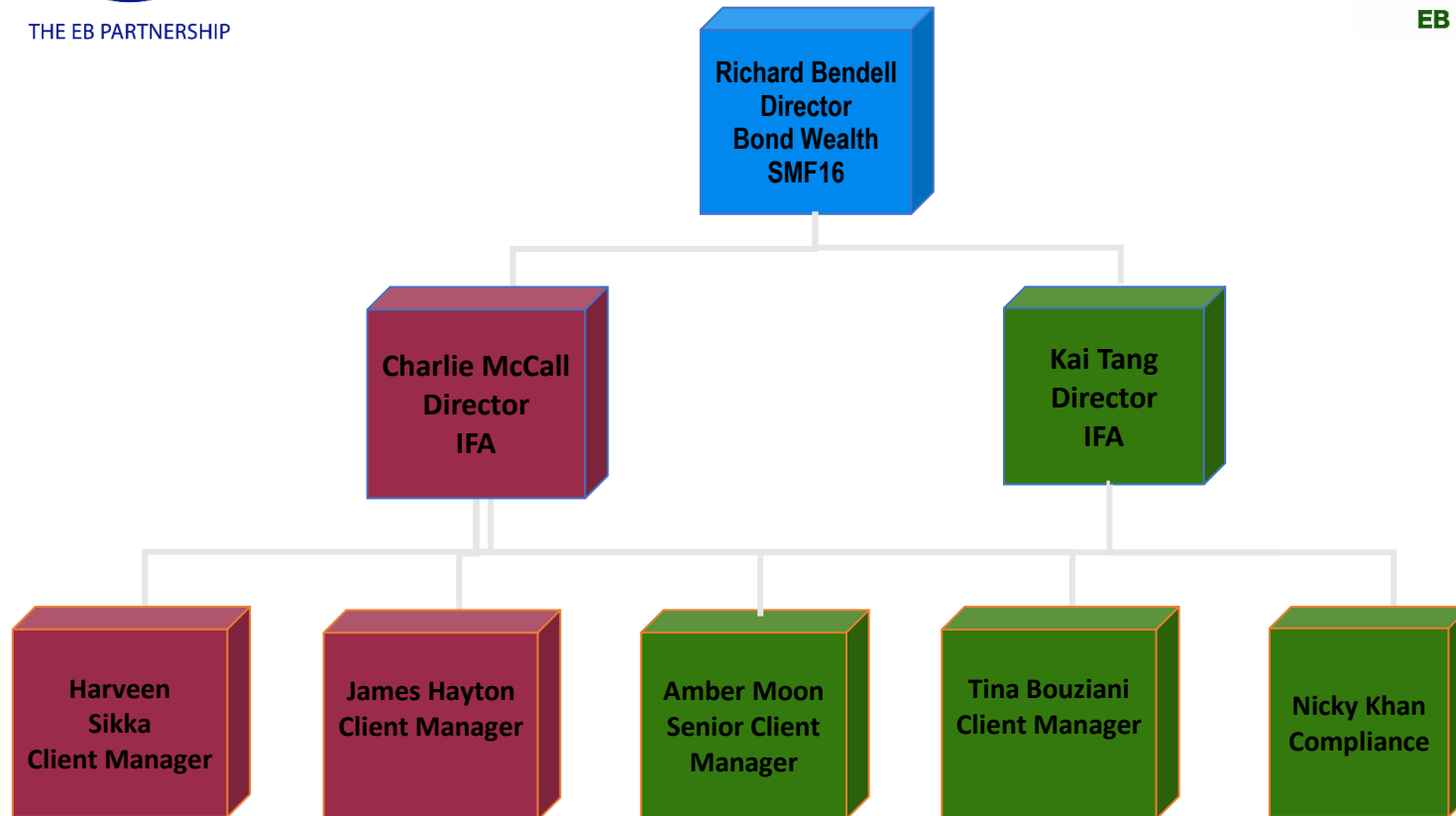
THE EB PARTNERSHIP

The EB Partnership

Appendix 1: Organization Chart



EB Wealth



Bond Wealth

The EB Partnership (Corporate)

EB Wealth

The colour scheme for The EB Partnership and EB Wealth employees represents their main responsibilities.

