Overview of Group Policies

Policy	Synopsis
Group Risk Framework	Outlines the overall framework and Group policies for the management of risk within the Group.
Group Policy on Reporting Concerns or Irregularities	The Policy highlights the Rothschild & Co Group's commitment to conducting its business with honesty and integrity. It places an obligation on staff members to escalate – anonymously if required - any concern regarding possible illegal or unethical conduct in the workplace and provides for any such concerns to be investigated thoroughly and impartially.
Group Complaints Policy	The Policy sets out arrangements aimed at ensuring that any customer complaint is assessed promptly, fairly and consistently, that there is adequate and appropriate communication with the complainant and that analysis is undertaken to determine whether the underlying cause of any complaint may impact other products or processes.
Group Conflicts of Interest Policy	From time to time, a conflict of interest may arise between a Rothschild & Co company and a client, between one client and another or between a Rothschild & Co company and an employee. The Policy outlines the Group's arrangements for preventing such conflicts wherever possible and for identifying and managing them where they cannot be avoided, such that the best interests of clients and investors are protected.
Group Market Abuse Policy	The Policy states the Rothschild & Co Group's zero tolerance approach towards any market activity that could be construed as abusive. It sets out specific arrangements designed to prevent the misuse of confidential information or any form of market manipulation.
Divisional Policies governing business conduct	Rothschild & Co's Global Advisory, Wealth and Merchant Banking Divisions each maintain further detailed policies which aim to ensure their specific business activities are conducted with professionalism and integrity, and in compliance with applicable regulatory rules.
Group Financial Crime Policy	Identifies the Group's Anti-Money Laundering and Counter-Terrorist Financing standards and requirements. This includes Financial Crime Risk Assessments and the risk-based approach, Training, Group Policy on Anti-Bribery and Corruption; Group Policy on Sanctions, Group strategy on prevention of fraud, Tax evasion and related offences, Reporting Suspicions and Consequences of Breaches.
Group Client Due Diligence Policy	Identifies the Group's CDD standards and requirements. This includes Identification, PEPs, Application of this Policy to Asset and/or Fund Management Entities, Tax Compliance, Suspicious Activity Reporting, Record Keeping and Management Information.
Group Sanctions Policy	Identifies the Group's Sanctions standards and requirements. This includes the Regulatory environment, Principles, Screening, Training and Reporting Obligations.
Group Anti-Bribery & Corruption Policy	Identifies the Group's ABC standards and requirements such as Charitable Donations, Sponsorship, Recruitment, Political Donations, Third Party Relationships, Gifts and Entertainment and Training.
Group Gifts & Entertainment Policy	Identifies the Group's G&E standards and requirements. This includes Standards of Judgement, levels, PEPs and Public Officials, Gifts Offered to Clients and Business Contacts in a Personal Capacity, Closing Dinners, Use of R&Co facilities and Individual Levels and Requirements.

Rothschild & Co

Overview of Group Policies

Policy	Synopsis
Group Policy on Intra-Group Information Sharing	Identifies the Group's IGIS standards and requirements, including the Roles and Responsibilities of Regional Heads of Financial Crime and Group Financial Crime Compliance.
Group Credit Risk Policy	Outlines out the overall framework and policy for the management of credit risk within the Group.
Group Liquidity Risk Policy	Outlines out the overall framework and policy for the management of liquidity risk within the banking entities of the Group.
Group Market Risk Policy	This document sets out the overall framework and policy for the management of market risk within the Group.
Group Operational Risk Policy	Outlines the framework for identifying, controlling, monitoring, measuring and reporting operational risks in a consistent manner across the Group.
Group New Products Approval Policy	Outlines the policy regarding the approval of new products within the Group. New products are defined, processes and requirements are described, and reporting protocols are established.
Group Outsourcing Policy	Outlines the approach to managing risks associated with Outsourcing.
Group Information Security Policy	Establishes the Group Information Security Policy pursuant to the Group Risk Framework for the Group. Core principles for supporting and defending the Group and to ensure compliance with the regulations applicable to the Group are defined.
Group Data Protection Policy	Defines the core principles for protecting Personal Data processed by or on behalf of the Group and to help facilitate compliance with relevant legal and regulatory Data Protection obligations that the Group must adhere to globally.
Group Acceptable Use Policy	Outlines acceptable use of information, systems and services at Rothschild & Co. The Policy is designed to protect the interests of the Group, its employees, clients and other individuals affiliated with the Group.