



# Shareholder Rights Directive II – Engagement Policy

Rothschild and Co Wealth Management UK (“R&Co WMUK”) is a shareholder in a number of investee companies due to its role as investment manager of its in-house funds and discretionary investment manager for its clients.

It is an active investor, exercising its voting rights. R&Co WMUK performs fundamental analysis of investee companies both before investment and during the period of investment.

The areas that it researches and monitors specifically include strategy, financial and non-financial performance and risk, capital structure and social and environmental impact, as well as corporate governance. Where R&Co WMUK invests directly in investee companies, it may take several months of analysis before it decides to make an investment.

During that time, it will hold extensive dialogue with management of the investee companies. As with all aspects of its business, R&Co WMUK identifies, manages and discloses actual and potential conflicts of interest in relation to its role as shareholder.

Much of this approach is set out in the firm’s UK Stewardship Code Statement which can be found on this website. The firm is currently transposing this approach into its Engagement Policy, as required by the Shareholder Rights Directive II, and will publish the policy here shortly.