



Financial Crime Policy Statement

Rothschild & Co

Rothschild & Co (the “Group”) is firmly committed to maintaining high ethical standards and complying with applicable laws, rules and regulations designed to combat financial crime. In order to safeguard its reputation and integrity, the Group has developed preventive measures to deter financial crime and mitigate relevant risks.

1. Anti-Money Laundering and Counter-Terrorist Financing (AML-CTF) Policy Statement

Group-wide policies have been implemented based on strong AML-CFT standards, ensuring compliance with applicable laws, regulations, and supervisory expectations across Rothschild & Co’s global operations. A financial crime compliance programme applies to all entities and employees within the Group. The programme includes:

- A dedicated governance structure for managing AML and CTF risks, with appointed compliance officers at group, regional, and local levels.
- Senior management is involved in the riskiest client onboarding and maintenance decisions.
- Employees receive regular, risk-based training to understand financial crime risks and compliance responsibilities.
- Policies and controls are reviewed regularly for effectiveness, and compliance is monitored through both second line and third line functions.
- A strong compliance culture is promoted by senior leadership, and the group actively participates in industry forums to stay informed and contribute to market standards.
- Appropriate vigilance measures are implemented to detect any unusual or suspicious transactions and, where necessary, to submit a suspicious activity report to TRACFIN or other applicable local Financial Intelligence Units (FIUs) as appropriate.

Rothschild & Co treats tax evasion as a crime linked to money laundering and is committed to preventing involvement by enforcing standards on client due diligence and prohibiting the misuse of its services.

2. Sanctions Policy Statement

The Group has a **robust sanctions framework** aimed at ensuring compliance with all relevant sanctions’ laws and regulations applicable to its global operations. All the Group’s entities and employees must comply with standards, including:

- Screening the identity of clients and applicable connected parties, relevant third parties and transactions against the **sanctions lists issued by the European Union, the United Kingdom, the United Nations Security Council, the United States of America and any other applicable local authorities**.
- Ensuring that no client is accepted or maintained without the approval of the appropriate acceptance committee or senior management, as deemed appropriate.
- Prohibiting any attempt to conceal, forge, strip, or alter payment information to evade sanctions detection.
- Maintaining up-to-date client and monitoring records, providing regular risk-based training to employees, and reviewing the effectiveness of sanctions-related policies, procedures, systems, and controls on a regular basis.

The Group may decide not to provide products or services even where it is permitted by sanctions regimes. These decisions may be guided by risk appetite, business efficiency, senior management or any other such reason.

3. Anti-Bribery and Corruption (ABC) Policy Statement

The Group is committed to conduct its global operations in full compliance with all applicable ABC laws and regulations such as the **French Sapin 2 law, the UK Bribery Act (UKBA)** and **the Foreign Corrupt Practices Act (FCPA)**. To support this commitment, the programme includes the following key elements:

- Prohibition on offering, giving, soliciting, or accepting anything of value, directly or indirectly, if it could be perceived as intended to improperly influence business and requirement for compliance to pre-approve gifts, entertainment, donations, and sponsorships based on certain thresholds.
- Mandatory, risk-based training for all employees.
- Clear consequences for policy breaches, and a requirement to report any suspicions of bribery, corruption, or other serious concerns through the Group's whistleblowing channels.

The Group ABC Policy complements the **Group Code of Conduct**, in which the behaviours expected from all employees (and third parties) are stated, as well as the potential consequences of failure.

