



Appendix – List of Services Outsourced by Rothschild & Co Wealth Management Luxembourg

Area	Description of Service	Information Shared	Location of Provider(s)	Clients Concerned
Know Your Customer (KYC)	Conducting back office checks and verifications of KYC documentation for all parties involved in a business relationship, including beneficial owners. These checks take place when accounts are opened, during periodic reviews, and following any changes in the relationship.	<ul style="list-style-type: none"> - Client identification data (including all parties involved in the relationship and beneficial owners). - All information provided at account opening or subsequently, including client background, source of funds or wealth, and all information provided when transactions are carried out on accounts held with R&Co WML. 	R&Co Wealth Management Luxembourg's head office in France.	All clients.
Know Your Customer (KYC)	<ul style="list-style-type: none"> - Providing a software application used to update KYC data for R&Co Wealth Management Luxembourg clients. - Inputting, checking, and updating client information in the systems when accounts are opened and when client accounts are periodically reviewed. 	<ul style="list-style-type: none"> - Client identification data (for all parties involved in the relationship, including agents, legal representatives, and individuals with account authority, as well as beneficial owners). - All information provided at account opening or subsequently, including client background, source of funds or wealth, and all information provided when transactions are carried out on accounts held with R&Co WML. 	R&Co Wealth Management Luxembourg's head office in France.	All clients.
Anti-Money Laundering and Counter Terrorist Financing (AML/CFT) / International Financial Sanctions and Embargos	<p>To meet the bank's statutory AML/CFT obligations and ensure compliance with applicable sanctions and embargo regimes, a specialized software package is used to carry out the following checks:</p> <ul style="list-style-type: none"> - Screening existing and prospective clients against international sanctions lists issued by the European Union, United Nations, Luxembourg, the United Kingdom, and other relevant authorities. - Screening existing and prospective clients against lists of politically exposed persons (PEPs). - Screening existing and prospective clients against adverse media databases (including press articles and publicly available information). 	<ul style="list-style-type: none"> - Identification data for existing and prospective clients, related individuals, intermediaries, and counterparties. - Data on clients' financial instrument transactions and funds transfers. - All information provided at account opening or subsequently, including client background, source of funds or wealth, and all information provided when transactions are carried out on accounts held with R&Co WML. 	R&Co Wealth Management Luxembourg's head office in France and service provider based in France.	All clients.



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	- Screening financial transactions and funds transfers against the aforementioned sanctions lists.			
Adverse Media Screening	Conducting adverse media searches on existing and prospective clients and related parties using publicly available data.	Client identification data (including all parties involved in the relationship and beneficial owners).	R&Co Wealth Management Luxembourg's head office in France.	All clients.
Anti-Money Laundering and Counter-Terrorist Financing (AML/CFT)	- Sharing AML/CTF information to support efforts to prevent money laundering and terrorist financing within the R&Co Group. - Reviewing alerts escalated by R&Co Wealth Management Luxembourg's Compliance function to assess money laundering or terrorist financing risks.	- Client identification data (including all parties involved in the relationship and beneficial owners). - All information provided at account opening or subsequently, including client background, source of funds or wealth, and all information provided when transactions are carried out on accounts held with R&Co WML. - AML/CFT analysis.	R&Co Wealth Management Luxembourg's head office in France and all other Rothschild & Co Group entities.	All clients.
Anti-Money Laundering and Counter-Terrorist Financing (AML/CFT)	Conducting first-line controls on client transactions as part of AML/CFT surveillance.	- Client identification data (including all parties involved in the relationship and beneficial owners). - All information provided at account opening or subsequently, including client background, source of funds or wealth, and all information provided when transactions are carried out on accounts held with R&Co WML.	R&Co Wealth Management Luxembourg's head office in France and service provider based in France.	All clients.
Electronic KYC Document Storage	- Providing an electronic platform for storing KYC and contractual documents in digital format.	- Client identification data (including all parties involved in the relationship and beneficial owners). - All information provided at account opening or subsequently, including client background, source of funds or wealth, and all information provided when transactions are carried out on accounts held with R&Co WML. - Pre-contractual and contractual documents.	R&Co Wealth Management Luxembourg's head office in France and service provider based in France.	All clients.
Market Abuse Prevention	- Providing a solution for monitoring financial instrument transactions in order to detect instances of market abuse.	- Transaction data, including client identification data.	R&Co Wealth Management Luxembourg's head office in France.	All clients.



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	- Screening financial instrument transactions and processing market abuse alerts.	- More generally, all information provided by the client at account opening or subsequently, including KYC and source of funds data.		
Second-Line Operational Controls	- Operational controls on the performance of banking and investment services, and also on financial transactions. - Operational controls on the processes and resources that support R&Co Wealth Management Luxembourg's AML/CTF and MiFID compliance framework.	- Client identification data (including all parties involved in the relationship and beneficial owners). - Banking and financial data. - Data relating to deposits and transactions in financial instruments. - Payment data and financial flows.	R&Co Wealth Management Luxembourg's head office in France.	All clients.
Business Ethics & Anti-Corruption	Providing an application to monitor gifts and hospitality offered to or received from clients by R&Co Wealth Management Luxembourg.	Client identification data (including all parties involved in the relationship and beneficial owners).	Rothschild & Co Group entities based in France and the UK.	All clients.
MiFIR Transaction Reporting	Preparing and submitting MiFIR reports relating to transactions in financial instruments.	- Client identification data. - Data relating to transactions in financial instruments.	R&Co Wealth Management Luxembourg's head office in France.	All clients.
Whistleblowing	Providing support with handling whistleblowing alerts.	All information reported via the whistleblowing procedure, and any information required to process the alert.	R&Co Wealth Management Luxembourg's head office in France.	Clients concerned by whistleblowing (whether directly or indirectly).
Tax Reporting	Tax reporting service for clients.	- Client identification data. - Financial data: account number, account balance, positions in financial instruments, transactions, and client identification data.	R&Co Wealth Management Luxembourg's head office.	All clients.
Risk Management Controls	- Risk management-related activities, including: - Risk management controls: financial risks, investment risks, operational risks, including information systems security risks. - Monitoring compliance with the client's risk appetite profile. - Analyzing and tracking operational incidents. - Conducting second-line controls, analyses, and reviews as part of risk prevention and management policy.	- Client identification data (including all parties involved in the relationship and beneficial owners). - Data relating to transactions in financial instruments. - Financial data: account number, account balance, positions in financial instruments, transactions, and client identification data. - More generally, all information provided by the client at account opening or subsequently.	R&Co Wealth Management Luxembourg's head office in France.	All clients.



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Internal Audit	<ul style="list-style-type: none"> - R&Co Wealth Management Luxembourg's internal audit handled by Rothschild & Co Group's Internal Audit function. - Internal audit tasks carried out according to a multi-year internal audit plan. 	<ul style="list-style-type: none"> - Client identification data (including all parties involved in the relationship and beneficial owners). - Data relating to transactions in financial instruments. - Financial data: account number, account balance, positions in financial instruments, transactions, and client identification data. - More generally, all information provided by the client at account opening or subsequently, including KYC and source of funds data. 	R&Co Wealth Management Luxembourg's head office in France and Rothschild & Co Group entities based in the UK and Switzerland.	All clients.
Credit Application Review	<p>Conducting preliminary reviews of loan applications and credit guarantees, and recording commitments in the bank's systems.</p> <p>Monitoring and controlling credit exposure risks.</p>	Client data needed to assess client credit risks, including personal details, financial information (such as guarantees, insurance, collateral, and assets), wealth data, and transaction records.	R&Co Wealth Management Luxembourg's head office in France.	Clients applying for credit.
IT Infrastructure	<ul style="list-style-type: none"> - Providing and managing IT and technical infrastructure, including IT support and maintenance services, and cloud-based systems. - Managing related services, such as providing and maintaining of work environments, the email system, and the file server. - Managing installations and hosting for applications used by R&Co Wealth Management Luxembourg. 	All data in R&Co Wealth Management Luxembourg's possession, including client identification data (including all parties involved in the relationship and beneficial owners), banking information, financial information, wealth data, and transaction records.	R&Co Wealth Management Luxembourg's head office in France.	All clients.
IT Applications	<p>Managing IT applications and solutions, and providing management and maintenance services for those applications, including:</p> <ul style="list-style-type: none"> - Front-office platform (order execution and portfolio management). - Client relationship management (CRM) application - Core banking system for managing cash and securities, including accounting workflows. - Application used to management life assurance policies. 	All data in R&Co Wealth Management Luxembourg's possession, including client identification data (including all parties involved in the relationship and beneficial owners), banking information, financial information, wealth data, and transaction records.	R&Co Wealth Management Luxembourg's head office in France and providers based in France and Luxembourg.	All clients.



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	<ul style="list-style-type: none"> - Software package used to prepare regulatory accounting reports. - Incident management solution. 			
IT Security	<ul style="list-style-type: none"> - Managing the data loss prevention system. 	Email metadata.	R&Co Wealth Management Luxembourg's head office in France.	All clients.
Accounts	<ul style="list-style-type: none"> - Handling R&Co Wealth Management Luxembourg bank and analytical accounting, carrying out accounting controls and monitoring budgets. 	<ul style="list-style-type: none"> - Client identification data. - Financial data: account number, account balance, positions in financial instruments, transactions, and client identification data. - Data relating to transactions in financial instruments. 	R&Co Wealth Management Luxembourg's head office in France.	All clients.
Prudential Reporting	<ul style="list-style-type: none"> - Providing an application used to prepare certain prudential reports (AnaCredit, FINREP) to be submitted to the relevant authorities. - Preparing prudential reports (AnaCredit, FINREP) for R&Co Wealth Management Luxembourg. - Carrying out checks on prudential reports and statistics sent to the relevant authorities. 	<ul style="list-style-type: none"> - Client identification data. - Financial data: account number, account balance, positions in financial instruments, transactions, and client identification data. - Data relating to transactions in financial instruments. 	R&Co Wealth Management Luxembourg's head office in France and service provider based in Luxembourg.	All clients.
Legal	<ul style="list-style-type: none"> - Providing legal advice and assistance to R&Co Wealth Management Luxembourg in the field of banking law and investment services / financial instruments. - Assisting with complaint and dispute handling. - Handling cases involving successions, legal incapacity, and gifts, and issuing legal certificates. - Drafting and managing documentation (including master agreements) for loans and guarantees for cases involving complex financing arrangements and guarantees. 	<ul style="list-style-type: none"> - Client identification data (including all parties involved in the relationship and beneficial owners). - Data relating to transactions in financial instruments. - Financial data: account number, account balance, positions in financial instruments, transactions, and client identification data. 	R&Co Wealth Management Luxembourg's head office in France, and in certain cases specialist law firms based in France or Luxembourg.	All clients.
Payments	<ul style="list-style-type: none"> - Processing SEPA transfers and direct debits, direct debit stop requests, and related transactions such as payment rejections. - Processing international SWIFT transfers. - Foreign exchange transactions. - Monitoring payment execution. 	<ul style="list-style-type: none"> - Financial data: account number, account balance, positions in financial instruments, transactions, and client identification data. 	R&Co Wealth Management Luxembourg's head office in France and, <ul style="list-style-type: none"> - for SEPA transfers and direct debits: credit institution based in France, - for SWIFT transfers: service provider based in France. 	All clients.



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Transactions in Financial Instruments	<ul style="list-style-type: none">- Managing custody account keeping for financial instrument accounts held with R&Co Wealth Management Luxembourg, including settlement operations, subscriptions and redemptions of UCITS, derivatives, private equity transactions, securities transactions and coupon payments, and cash and securities reconciliation.	<ul style="list-style-type: none">- Data relating to transactions in financial instruments.- Financial data: account number, account balance, positions in financial instruments, transactions, and client identification data.	R&Co Wealth Management Luxembourg's head office in France.	All clients.
CRS, FATCA, and QI Tax Reports	<ul style="list-style-type: none">- Providing a solution for processing alerts flagging changes in clients' tax circumstances.- Processing alerts flagging changes in clients' tax circumstances.	<ul style="list-style-type: none">- Client identification data (including all parties involved in the relationship and beneficial owners).- Data relating to transactions in financial instruments.- Financial data: account number, account balance, positions in financial instruments, transactions, and client identification data.	R&Co Wealth Management Luxembourg's head office in France and service provider based in France.	All clients.
Business Development	<ul style="list-style-type: none">- Verification of the presence of prospects/clients in the CRM during prospecting activities (cross-border deals identified by the data team) and monitoring of significant news.- Support in setting up local commercial committees.- Review of the "deal announcement" document, which anonymously lists deals shared with the front office, by cross-checking the information available in the CRM.- Marketing support for communication to clients / prospects (monthly, quarterly letters, flash...).	<ul style="list-style-type: none">- Client identification data (including all parties involved in the relationship and beneficial owners).- Data relating to transactions in financial instruments.- Financial data: account number, account balance, positions in financial instruments, transactions, and client identification data.	R&Co Wealth Management Luxembourg's head office in France.	All clients.
Financial Reporting	<ul style="list-style-type: none">- Preparing consolidated financial reports intended for clients.	<ul style="list-style-type: none">- Client identification data (including all parties involved in the relationship and beneficial owners).- Data relating to transactions in financial instruments.- Financial data: account number, account balance, positions in financial instruments, transactions, and client identification data.	R&Co Wealth Management Luxembourg's head office in France.	All clients.



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Structured Product Investment Solutions	- Designing and developing structured products/derivatives for R&Co Wealth Management Luxembourg's clients. - Financial, legal, and administrative monitoring of investments in structured products/derivatives.	- Client identification data (including all parties involved in the relationship and beneficial owners). - Data relating to transactions in financial instruments. - Financial data: account number, account balance, positions in financial instruments, transactions, and client identification data.	R&Co Wealth Management Luxembourg's head office in France.	All clients.
Destruction of Physical Documents and Archives	- Destroying R&Co Wealth Management Luxembourg's physical documents.	All data in R&Co Wealth Management Luxembourg's possession, including client identification data (including all parties involved in the relationship and beneficial owners), banking information, financial information, wealth data, and transaction records.	Service provider based in Luxembourg.	All clients.