



ESG Integration Policy

RothschildCo Wealth Management Spain, A.V., S.A.

Wealth Management
Spain

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Document history

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V1	New policy	GAR	28/11/2022	01/12/2022
V2	Incorporation of Annex I Group Policy	GAR	03/03/2026	23/03/2026

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1. Introduction

This document describes how environmental, social and governance (ESG) factors are integrated into the investment activities at **Rothschildco Wealth Management Spain, A.V., S.A.** (hereinafter the “**Company**”).

This policy responds to and sets out the scope of its publication obligations in compliance with Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability disclosures in the financial services sector (the “**SFDR**”).

The Company believes the consideration of ESG factors is essential for three reasons:

1. **It helps to mitigate risk and possibly enhance performance for our clients’ wealth.** Companies with high ESG standards tend to be better managed and might offer superior long-term profitability. Moreover, ESG is becoming an increasingly important factor in financial markets with the stocks and bonds of companies with inferior ESG track records more likely to be downgraded.
2. **It helps contribute to a more equitable and sustainable world.** The Company sees responsible investing as an opportunity to achieve a lasting impact by playing an active role in the successful transformation of industries towards a more sustainable future. This can be achieved through good stewardship and active ownership with the aim to foster better ESG practices.
3. **It meets growing ESG awareness from the Company’s clients.** Clients’ attention to ESG issues is increasing. The Company wants to evolve its investment activities to better meet these requirements and needs.

2. Adherence to the Group’s ESG Integration policy

The Company, as part of the Rothschild & Co Group (the “**Group**”), has adopted the Group’s ESG approach and has expressly adhered itself to the Groups’ ESG Integration Policy, which content are reproduced in the **Annex I**, which is saved apart as a document named “*ESG, Sustainability and Greenwashing*”.

The main pillars of the Group’s ESG approach, and therefore of the Company’s ESG approach are the following:

1. **Exclusion guidelines.** This describes which investments are excluded due to the negative social and environmental impact of the investee companies.
2. **Definition of sustainable investments.** This section describes the Group’s, and therefore the Company’s definition of sustainable investments as well as investments aligned with environmental and social characteristics according to the guidelines introduced by the SFDR.
3. **Integration of ESG in security selection, portfolio construction and advisory.** This section outlines how the Group, and therefore the Company integrates ESG aspect into its portfolio management and advisory activity.
4. **The Group’s stewardship activities.** This includes having an active voting and engagement policy.

These pillars apply to the Company’s discretionary mandates, as well as its advisory business.

Please refer to the **Annex I** for additional details or further clarification.

3. Publicity of the ESG Integration Policy

In compliance with Art. 3 of SFDR, the Company publishes this policy on its website with the commitment to incorporate any developments that the Group, and therefore the Company implements as a result of regulatory changes or changes in its position with respect to this policy.

ANNEX I

Rothschild & Co Group's ESG Integration Policy