Rothschild & Co

Wealth & Asset Management common investment policies

Exclusion policy relating to controversial weapons

Exclusion policy relating to tobacco

Investment policy relating to Fundamental Principles

Investment principles for the thermal coal sector

11/06/2026

Intro

This policy is part of the common framework for the Wealth & Asset Management division, establishing a shared baseline that may be supplemented by entity-level policies going beyond this standard.

This exclusion policy applies without prejudice to any additional applicable local requirements.

Exclusion policy relating to controversial weapons

Rothschild & Co Wealth & Asset Management has established a formal exclusion policy regarding investment into companies with ties to controversial prohibited weapons.

This exclusion policy is part of a comprehensive Responsible Investment framework for Wealth & Asset Management and is:

- Aligned with our approach to ESG criteria integration among our investment strategies;
- Part of a response to the risks induced by ESG risks for our investors;
- Compliant with applicable international conventions and regulations.

The common framework for the Wealth & Asset Management division establishes a shared baseline that may be supplemented by entity-level policies going beyond this standard.

Scope of application

This exclusion policy applies to our various discretionary listed and unlisted investment activities in:

- Private banking
- Asset management

This exclusion policy concerns open-ended funds, closed-ended funds, dedicated discretionary funds or managed accounts and advisory mandates (investment proposals) but does not cover execution-only accounts.

This exclusion policy covers investments in securities and financing of loans or bonds issued by the excluded companies.

The exclusion policy covers our assets under direct and indirect management including structured products but does not apply to index-linked instruments nor index-linked structured products.

Defining the controversial weapons sector

This exclusion policy applies to companies with ties to controversial weapons prohibited by international conventions that most EU member states are parties to, including:

- Cluster munitions
- Anti-personnel landmines
- Chemical weapons
- Biological weapons

The use, possession, development, transfer, manufacture, and stockpiling of these weapons are prohibited by international conventions:

- Convention on the Prohibition of the use, stockpiling, production and transfer of Anti-Personnel Mines and on their destruction, also known as the Ottawa Convention (1997)
- Convention on Cluster Munitions, also known as the Oslo Convention (2008)
- Biological Weapons Convention, formally known as "The Convention on the Prohibition of the Development, Production and Stockpiling of Bacteriological (Biological) and Toxin Weapons and on their Destruction" (1972)
- Convention on the Prohibition of Chemical Weapons (1993)

This exclusion policy is implemented according to the following rules

Listed assets under direct management

- No investment can be made, and no lending provided, to companies with ties to controversial prohibited weapons.
- Identified companies are excluded from the investment universe without exception.

Assets managed by external financial managers and listed and non-listed funds or funds of funds

- The policy applies to delegated managers.
- We integrate analysis of controversial weapons policies in fund selection.
- We review funds without equivalent policies on a case-by-case basis.

Governance, data sources and review

Implementation relies on international conventions and ESG data providers. Oversight is ensured by Responsible Investment/ Sustainability, Risk and Compliance teams.

The policy is reviewed at least every two years.

Exclusion policy relating to tobacco

Rothschild & Co Wealth & Asset Management has established a formal exclusion policy regarding investment into companies whose activities are linked to the tobacco industry.

This exclusion policy is part of a comprehensive Responsible Investment framework and is:

- Aligned with ESG integration;
- A response to sustainability risks;
- Reflective of our commitment to public health and environmental protection.

The common framework for the Wealth & Asset Management division establishes a shared baseline that may be supplemented by entity-level policies going beyond this standard.

Scope of application

- Private banking
- Asset management

This exclusion policy concerns open-ended funds, closed-ended funds, dedicated discretionary funds or managed accounts and advisory mandates (investment proposals) but does not cover execution-only accounts.

This exclusion policy covers investments in securities and financing of loans or bonds issued by the excluded companies.

The exclusion policy covers our assets under direct and indirect management including structured products but does not apply to index-linked instruments nor index-linked structured products.

Some issuers held may be subject to exceptions:

- in the event that the management company is required to comply with the constraints or choices expressed by the client on his dedicated vehicle, which may conflict with these principles
- in the context of sectorial funds.

Defining the tobacco sector

This policy applies to companies involved in the tobacco value chain, including e-cigarettes.

The following thresholds apply:

- ≥ 5% revenues:
  - Producers
- ≥ 15% revenues (on a combined basis):
  - Distributors
  - Retailers
  - Suppliers

Exclusions are applied at parent level and extended to subsidiaries (case-by-case exceptions allowed).

This exclusion policy is implemented according to the following rules

Listed assets under direct management

- No investment or lending to excluded companies.
- Existing exposures are remediated within defined operational timelines.

Assets managed by external financial managers and listed and non-listed funds or funds of funds

- The policy applies to delegated managers.
- Integration of tobacco policies into fund selection.
- Enhanced review where no policy exists.
- Residual exposure minimized in indirect investments.
- Engagement with managers where required.

Governance, data sources and review

Implementation relies on ESG data providers (revenue exposure).

Oversight is ensured by Responsible Investment/ Sustainability, Risk and Compliance teams.

The policy is reviewed at least every two years.

Investment policy relating to Fundamental Principles

Rothschild & Co Wealth & Asset Management implements a policy addressing severe breaches of fundamental principles.

This policy:

- Supports ESG integration
- Addresses controversy risk
- Aligns with international norms

The common framework for the Wealth & Asset Management division establishes a shared baseline that may be supplemented by entity-level policies going beyond this standard.

Scope of application

- Private banking
- Asset management

This exclusion policy concerns open-ended funds, closed-ended funds, dedicated discretionary funds or managed accounts and advisory mandates (investment proposals) but does not cover execution-only accounts.

This exclusion policy covers investments in securities and financing of loans or bonds issued by the excluded companies.

The exclusion policy covers our assets under direct and indirect management including structured products but does not apply to index-linked instruments nor index-linked structured products.

Some issuers held may be subject to exceptions:

- in the event that the management company is required to comply with the constraints or choices expressed by the client on his dedicated vehicle, which may conflict with these principles
- in the context of sectorial funds.

Defining Fundamental Principles breaches

Applies to companies involved in:

- Human rights violations
- Environmental damage
- Corruption
- Severe ethical breaches

Approach is **qualitative and case-by-case.**

Based on:

- ESG data providers
- Internal analysis

This policy is implemented according to the following rules

Listed assets under direct management

- Case-by-case assessment
- No investment where breach confirmed
- Engagement possible but not sufficient in severe cases

Assets managed by external financial managers and listed and non-listed funds or funds of funds

- The policy applies to delegated managers.
- Integration into fund selection
- Enhanced review where no policy exists.
- Residual exposure minimized in indirect investments.
- Engagement with managers where required.

Governance, data sources and review

- Based on controversy screening
- Internal escalation processes
- Annual review

Oversight is ensured by Responsible Investment/ Sustainability, Risk and Compliance teams.

The policy is reviewed at least every two years.

Investment principles for the thermal coal sector

Rothschild & Co Wealth & Asset Management supports the transition to a low-carbon economy.

These principles are:

- Aligned with ESG integration;
- A response to climate risks;
- Designed to support the coal phase-out.
- Aligned with the international timetable for the phased-out of coal, for which clear deadlines have been set: 2030 for Europe and the OECD, and 2040 for the rest of the world

The common framework for the Wealth & Asset Management division establishes a shared baseline that may be supplemented by entity-level policies going beyond this standard.

Scope of application

- Private banking
- Asset management

This exclusion policy concerns open-ended funds, closed-ended funds, dedicated discretionary funds or managed accounts and advisory mandates (investment proposals) but does not cover execution-only accounts.

This exclusion policy covers investments in securities and financing of loans or bonds issued by the excluded companies.

The exclusion policy covers our assets under direct and indirect management including structured products but does not apply to index-linked instruments nor index-linked structured products.

Some issuers held may be subject to exceptions:

- in the event that the management company is required to comply with the constraints or choices expressed by the client on his dedicated vehicle, which may conflict with these principles
- in the context of sectorial funds.

Defining the thermal coal sector

Applies to companies in:

- Mining
- Power generation
- Coal services

Exclusion criteria

- Expansion exclusion
  - No investment in new coal projects : coal-mine, coal-fired power plant, coal-related infrastructure
- Revenue thresholds – Coal share of revenue
  - 10% mining & power
  - 10% services (exploration, processing, trading, transport & logistics, equipment manufacturing…)

Operational thresholds

- 10% coal share of power production
- 10 Mt thermal coal production
- 5 GW coal-fired generation capacity

Time horizon

- Phase-out aligned with 2030 (OECD) / 2040

This policy is implemented according to the following rules

Listed assets under direct management

- No support to expansion
- Investment allowed for companies implementing credible transition trajectories
- Exit if no credible transition strategy

Assets managed by external financial managers and listed and non-listed funds or funds of funds

- The policy applies to delegated managers.
- Integration in fund selection
- Enhanced review where no policy exists
- Residual exposure minimized in indirect investments
- Engagement with managers where required.