

The Stewardship Code

1.1 Objective of this Document

Rothschild Wealth Management (UK) Limited (“RWMUK”) manages portfolios predominantly on behalf of retail clients.

We recognise our wider stewardship responsibilities and to this end support the introduction of the FRC UK Stewardship Code (“Code”), which sets out the responsibilities of institutional shareholders in respect of investee companies. This statement sets out how RWMUK applies the seven principles of the Code.

1.2 Principles of the Stewardship Code

Principle 1

Institutional investors should publicly disclose their policy on how they will discharge their stewardship responsibilities.

This document records RWMUK’s policy in relation to the Code and is publicly available on our website.

Principle 2

Institutional investors should have a robust policy on managing conflicts of interest in relation to stewardship and this policy should be publicly disclosed.

RWMUK has a robust policy on managing conflicts of interest with the overriding requirement that RWMUK acts in the best interests of its clients and ignores and conflicting interests. Copies of the conflicts of interest policy are provided to all clients and can be provided to potential clients on request.

Principle 3

Institutional investors should monitor their investee companies.

A core part of our investment research process is to research and analyse all aspects of the investee companies’ businesses. We continue to monitor and analyse the companies after the initial decision to invest, as well as continuing to monitor the fundamentals based on publicly available information, company reports, external analysis research, and news flows etc.

Principle 4

Institutional investors should establish clear guidelines on when and how they will escalate their activities as a method of protecting and enhancing shareholder value.

Whilst great emphasis is placed on monitoring and analysing the investee companies, RWMUK’s approach is generally not to engage in shareholders’ activism campaigns against individual companies. Realistically, RWMUK’s stock holdings in companies will rarely, if ever, constitute a significant proportion of the ownership of a company in the way that an institutional asset manager or pension fund might. When a company proposes or takes a course of action which we consider to be detrimental to the interests of shareholders, we may attempt to open discussions, however we would probably sell our investment in the company. We are of the view that where the companies recognise an unexpected departure of a previously long-term shareholder this sends a strong signal in relation to the acceptability of its strategy.

Principle 5

Institutional investors should be willing to act collectively with other investors where appropriate.

Where we consider it appropriate on a case by case basis, RWMUK may act in co-operation with other investors to promote good governance of investee companies. However as noted above we do not, as a matter of course, engage in shareholder activism.

Principle 6

Institutional investors should have a clear policy on voting and disclosure of voting activity.

RWMUK does not vote other than for routine matters such as the election of stock or cash dividends. We may vote where we believe it is important to shareholder value.

RWMUK does not publicly disclose voting records as we believe that information to be confidential to our clients.

Principle 7

Institutional investors should report periodically on their stewardship and voting activities.

Where we have agreed with or have been instructed by our clients we would provide details of our voting activities to the clients concerned.

We report at least annually to our Board of Directors on the applicability of this document to Rothschild's stewardship activities, and make any changes recommended by the Board at those meetings.