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# Evelyn Partners Responsible Investment Policy

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## Policy Introduction

Evelyn Partner's corporate purpose is "to place the power of good advice into more hands". Our core values are to deliver a personal and inclusive service to all clients irrespective of their size, to build long-term partnerships which will stand the test of time and focus on performance, as we strive to be a forward-thinking and innovative business. We also have a strong sense of corporate responsibility, aiming to manage the impact of our business on people, suppliers, communities and the environment. Responsible investment is one of the four key pillars of Evelyn Partner's Corporate Responsibility approach (see our website for further information: [Corporate responsibility | Evelyn Partners](#)).

## Policy Owner

This Policy is owned by Evelyn Partners Stewardship & Responsible Investment Group, Investment Management.

## Scope

This policy applies to assets managed within discretionary portfolios managed by the Evelyn Partners Group (the Group – see end of policy for a list of applicable legal entities).

## What is Responsible Investment?

Responsible investment involves considering material environmental, social and governance (ESG) issues when making investment decisions, known as ESG integration, and influencing companies or assets, known as active ownership or stewardship. At Evelyn Partners, responsible investing is the default approach across all our investment services and products. There is a combined focus on the analysis of traditional financial risks alongside significant ESG factors, together with an active stewardship programme.

We believe responsible investment strengthens our internal processes. We also believe this is at the forefront of our fiduciary duty to our clients. We are signatories of the UK Stewardship Code 2026 and the UN Principles of Responsible Investment and participants in the UN Global Compact Network (UNGC). Our ongoing efforts to satisfy the requirements of continuous improvement elevates our client offering.

Non-financial factors can have a significant impact on the long-term financial performance and risk profile of investments, both positively and negatively. We note that companies with high standards of governance and corporate behaviours are likely to have more resilient business models. When investing in third-party funds, we work to choose those with a similar commitment to ESG integration and stewardship as Evelyn Partners.

We aim to be active stewards of the businesses in which we invest where necessary. We use our influence to improve ESG practices and performance in investee companies and by collective investment managers. We do this by engaging (directly and collaboratively) where we have material shareholdings and by voting at shareholder meetings. As stewards of our clients' capital, we seek to encourage better business practices, which should both enhance the value and reduce potential investment risks over the long term.

## Aligning with client values and sustainability related products and services

While responsible investing is the default approach across all our investment services and products, we also provide a range of sustainability-related investing options for clients who aim to align their values with their investment strategy. Our Discretionary Portfolio Service (DPS) enables portfolios to be tailored to individual client preferences and values, including the exclusion of specific themes or activities. Additionally, we offer clients specific sustainability-related products and services via funds in the Evelyn Horizon Fund range and the Evelyn Sustainable Model Portfolio Service. These products and services seek to invest in funds of funds, in companies that demonstrate social and environmental and /or sustainability characteristics that benefit from the growth of positive themes through their investments in areas such as energy conservation, sustainable transport, and sustainable food and water management, while containing minimal exposure to commonly excluded sectors to avoid negative environmental or social impact including tobacco production, controversial weapons and thermal coal.

## External Data Providers

We use MSCI to provide ESG data, screening and reporting, Morningstar Sustainalytics to augment our thematic direct engagements as part of our stewardship activities, Glass Lewis for proxy voting advice and Broadridge for electronic voting.

## Roles and Responsibilities

The Board ESG Committee has delegated authority to the Investment Process Committee (IPC) who have appointed The Stewardship and Responsible Investment Group (SRIG) to oversee the Group's approach to responsible investment. This includes the data, research and tools required to integrate material ESG considerations into our investment decisions. SRIG meets every 6 weeks and the IPC reports via other Committees to the Executive Committee (Exco), and regularly to the Board ESG Committee.

SRIG comprises of a range of investment managers from across the business and includes representatives of the Responsible Investment (RI) team. SRIG's objectives include the integration of ESG and responsible investment considerations into the investment process - including voting and shareholder engagement, and communication of our stewardship activities. To manage active stewardship, SRIG works closely with all parts of the investment process.

We have a dedicated Head of Responsible Investment and RI team supported by and working in conjunction with other colleagues across our business. Our RI team is central to our investment process, with these resources focused on supporting us in integrating non-financial risks and opportunities alongside traditional financial market factors. The RI team works in conjunction with colleagues of several other teams across our business, directly or indirectly involved in defining and implementing our RI and stewardship activities, including, Sustainability colleagues, Sector Specialists, RI Analysts and our Investment Strategy team. On a day-to-day basis, the RI team:

- facilitates ESG integration within the investment process by providing services, including training, screening and data insights
- provides commercial support working alongside investment managers to achieve good client outcomes, as well as deliver our stewardship activities, and
- delivers central reporting on behalf of the Group for responsible investment and regulatory interpretation and support

## Reporting and management information

As a signatory to the UN PRI, we adhere to the six principles and disclose our RI activities in accordance with their reporting framework guidelines. The final transparency report is published on our website. Our voting and engagement activity is published each quarter on our website. We are also committed to the principles of the UK Stewardship Code 2026. Our submission and annual stewardship reports can be found on our website. Management oversight reporting is provided on a bi-annual basis to the Board ESG Committee and periodically to SRIG and other parts of the Investment Management governance structure. Further information on our sustainability disclosures

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and related policies can be found in Evelyn Partners' Sustainability-Related Disclosure Statement, and Evelyn Partners' voting and engagement policies separately, available online at [www.evelyn.com](http://www.evelyn.com).

## Climate Risk Management

The Group's UK regulated entities are subject to the UK Financial Conduct Authority's (FCA) implementation of the Task Force on Climate-Related Financial Disclosures (TCFD), applicable to asset managers from 1 January 2023. This includes forward-looking scenario analysis and metrics on the financed emissions of our clients' investments. Our annual FCA TCFD entity report is available on our website. The Group has been a voluntary supporter of the TCFD since 2021.

## Systemic Sustainability Risks Including Human Rights and Nature

Please see the Sustainability-related Disclosure Statement for Evelyn Partners' approach to the above risks.

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## Legal Entities

The Group's Investment Management business is a signatory of the UN PRI and UK Stewardship Code 2026 and a participant to the UN Global Compact via its subsidiary company Evelyn Partners Services Ltd on behalf of the Evelyn Partners Group. This policy applies to the following legal entities which provide the Group's discretionary portfolio management services: Evelyn Partners Investment Management Services Limited (FCA) | Evelyn Partners Investment Management LLP (FCA) | Evelyn Partners Discretionary Investment Management Limited (FCA) | Tilney Discretionary Portfolio Management Limited (FCA) | Evelyn Partners Securities (FCA) | Evelyn Partners Investment Services Limited (FCA) | Dart Capital Limited | Evelyn Partners International Limited (Jersey) | Evelyn Partners Investment Management (Europe) Limited (Ireland).

Evelyn Partners UK legal entities are authorised and regulated by the Financial Conduct Authority  
Evelyn Partners Investment Management (Europe) Limited is regulated by the Central Bank of Ireland  
Evelyn Partners International Limited (Jersey) is regulated by the Jersey Financial Services Commission