



# King Charles III Charitable Fund (KCCCF) Responsible Investment Policy

**King Charles III Charitable Fund**

A company registered in England No. 06777589 and registered Charity No. 1127255  
Registered office address: 3 Orchard Place, Broadway, London, SW1H 0BF



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[Research has shown that] ‘companies which have implemented sustainability policies have out-performed their counterparts..., have... enjoyed lower costs of capital and achieved better risk-adjusted returns.’

HM King Charles III, June 2013.

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## Policy statement

KCCF holds investments with the aim of generating long-term total returns to underwrite its charitable giving. KCCF recognises that long term financial value depends on good governance and the preservation of social and natural capital and will therefore consider social, environmental and governance factors when choosing investments.

Overall responsibility for this policy and its implementation lies with the Trustees and the senior management team.

The Trustees will:

- Select investment managers who incorporate environmental, social and governance thinking into their investment policies and strategies;
- Consider the governance of the fund, bank or other asset manager in accordance with the UK Stewardship code and UNPRI as set out in the policy guidance;
- Engage investment managers on their performance;
- KCCF expects that investment managers will:
- Evaluate investments in companies according to the environmental and social criteria set out in the policy guidance;
- Not invest in companies or funds which are in conflict with KCCF’s charitable purpose;
- Consider the governance of the company or fund into which they are investing;
- Engage with companies based on their performance;
- Exercise its rights and responsibilities as an investor;
- Consider long term natural and social capital impacts as well as financial returns.

## Guidance

KCCF will not knowingly hold shares in companies that derive a significant (more than 10%) proportion of their income from the following activities, or invest in funds that hold a significant number of shares (more than 10%) in such companies:

- Fossil fuels – primary extraction of high-carbon fossil fuels (e.g. coal);
- Deforestation, endangered habitats and species – activities (e.g. agriculture, mineral or fuel extraction) that threaten or harm endangered habitats (e.g. tropical forests, ancient woodlands, peat lands), endangered species;
- Genetic modification – production or sale of genetically modified organisms;
- Intensive farming – intensive rearing of livestock;
- Agrochemicals – large-scale production of artificial fertilizers and pesticides;

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- Animal testing – testing of cosmetics and toiletries on animals for non-medical purposes;
- Sale of weapons – for e.g. ‘manufacture or sale of strategic weapons systems, munitions or combat platforms.’
- Human rights - Companies contravening international human rights standards or engaged in other human rights abuses
- Harmful products or activities such as tobacco, pornography and gambling.
- Negative employment practices - Companies exhibiting poor employment practices, such as those with poor management of labour relations or poor health and safety record.

## Stewardship and funds

KCCF expects that investment managers will:

- Commit to the UK Stewardship Code and explain any areas of non-compliance;
- Explain how environmental, social and governance (ESG) issues are considered and incorporated into the investment strategy;
- Pro-actively consider investing in businesses that make a positive contribution towards environmental, social and economic sustainability;
- Explain the approach taken to risk management, identifying material financial and non-financial risks and the systemic links between them;
- Report regularly on financial performance as well as the performance of stewardship rights and responsibilities and any material risks arising.

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Adopted on 15th December 2022

Last reviewed: October/November 2022