

HARGREAVES
LANSDOWN

**HARGREAVES
LANSDOWN
CORPORATE
POLICIES**

POLICIES

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INTRODUCTION

The Hargreaves Lansdown (HL) corporate policy guidebook, which is reviewed and monitored on a yearly basis, sets out the codes of conduct, controls, processes and requirements of all employees, divisions and the Corporate Office within HL.

They are a key element of the Group's corporate governance framework and help the business to demonstrate that it meets the requirements of the UK Corporate Governance Code and complies with all applicable laws and regulations.

The detailed policy requirements are aligned with the Group's strategy, risk appetite and corporate values and support the Group's commitment to operate its business activities in a sustainable, socially responsible and ethical way. We have zero tolerance to corruption in any form.

The teams within HL have responsibility for maintaining adequate procedures and controls to ensure that they and their business areas comply with the corporate policies. The Exco will be the responsible senior managers for ensuring compliance with the Corporate Policies within their division or corporate office.

Non-compliance with these policies is not acceptable and any potential areas of non-compliance must be immediately escalated to the relevant Policy Owner for the appropriate course of action to be considered. Persistent non-compliance may result in disciplinary action.

A summary of the policies that related to business conduct, corporate affairs, and legislation and regulation are set out overleaf:



BUSINESS CONDUCT

HUMAN RIGHTS

Hargreaves Lansdown is committed to respecting everyone's human rights in all aspects of the company. The policy is guided by the principles underpinned by The Universal Declaration of Human Rights, The International Covenant on Civil and Political Rights, The International Covenant on Economic, Social and Cultural Rights and The International Labour Organization's Declaration on Fundamental Principles and Rights at Work.

Article 23 of the Universal Declaration of Human Rights states that every worker has the right 'to just and favourable conditions of work' and 'equal pay for equal work'. Hargreaves Lansdown believes in clear, fair and transparent pay and reward. HL offers Maternity, Paternity, Adoption and Shared Parental pay. Flexible and part-time working is also available, where roles allow. We ensure that procedures are in place to guarantee that human rights are respected and standards are adhered to for all workers.

Guided by the Modern Slavery Act 2015, HL prohibits the use of forced labour, including modern slavery and any form of human trafficking and is committed to working with suppliers that are aligned with our passion for a valued and respected workforce.

This applies to all persons working for Hargreaves Lansdown or on our behalf including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

MODERN SLAVERY

Hargreaves Lansdown is dedicated to tackling modern slavery and human trafficking of any kind in both the business operations and supply chains. This sits in conjunction with HL's 'Request for Proposal' supplier process in which the company determines any unethical risks.

HL encourages behaviours and practices that are consistent with the Modern Slavery Act 2015 and in doing so, ensure all suppliers meet all minimum working



age laws and wages aligned with prevailing industry conditions.

The Modern Slavery policy requirements are shared with all third parties and suppliers.

This policy applies to all persons working for HL or HL's behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners.

CORRUPTION AND BRIBERY

Hargreaves Lansdown takes a zero-tolerance approach to bribery and corruption and is committed to acting within the parameters outlined in the Bribery Act 2010 as well as complying with all legal and ethical obligations. HL maintains strong controls to minimise any risk of association with acts of bribery or corruption including thorough due diligence checks on all third parties.

This policy applies to all persons working for Hargreaves Lansdown or on their behalf in any capacity, including employees at all levels, directors, officers, agency workers, seconded workers, volunteers, interns, agents, contractors, external consultants, third-party representatives and business partners or any other person associated with us, wherever located.

The aforementioned persons must comply with the minimum requirements:

- Do not knowingly or unknowingly accept, offer, pay, give, implore, or authorise bribes.

- Avoid making or accepting any and all forms of facilitation payments.
- Mandatory colleague training on fraud awareness – undertaken yearly

ANTI-FRAUD

Hargreaves Lansdown is committed to the prevention of fraud and the promotion of an anti-fraud culture.

This policy outlines the appropriate measures HL has implemented to deter, prevent and detect fraud, outlining common examples seen in similar settings (including but not limited to):

- **Phishing** – tricking victims into sharing personal information through fake websites.
- **Social engineering** – non-technical intrusion by fraudsters to trick employees into revealing information about secure information we hold such as client data or confidential company information or protocols.
- **Boiler room fraud** – fraudsters cold-call investors offering them worthless, overpriced or even non-existent shares
- Identity theft for the purpose of accessing someone else's account or the use of our services.
- Mandatory colleague training on fraud awareness – undertaken yearly

HL operates a no-tolerance attitude to fraud and requires staff to act honestly and with integrity at all times, and to confidentially report all reasonable suspicions of fraud swiftly and accurately.

INCLUSION, DIVERSITY AND EQUALITY

Hargreaves Lansdown is committed to building a diverse and inclusive workforce not just because it is the right thing to do but because it is good for clients, business and employees.

HL acknowledges the potential in everyone and recognises that talent is not determined by gender or gender identity, race, ethnicity, disability, sexual orientation, age, religion, social class or background.

Steered by the Equality Act 2010, HL will exceed the minimum requirements by applying the following:

- Not accepting inappropriate behaviour or conduct including harassment, racism, discrimination or bullying and encouraging diverse perspectives. All colleagues are treated with respect and dignity.
- Empowering colleague networks to drive awareness and engagement throughout HL and seek their ideas, input and feedback on activity.
- Train managers to reduce bias and build inclusive teams where everyone is encouraged to contribute, feels included and can be themselves.
- Communicate regularly and consistently about progress.

HEALTH AND SAFETY

Hargreaves Lansdown is committed to health and safety, the roles and responsibilities of teams and individuals in regard to health and safety and the associated arrangements within HL which are applicable to employees.

The policy facilitates the management of health and safety and to control all areas of risk arising from Company activities that may affect employees, young persons, contractors, members of the public, clients, visitors etc.

The guidance is underpinned by the Health and Safety at Work Act 1974 and the Management of Health and Safety at Work Regulations 1999. Colleagues have to undertake mandatory H+S training yearly.

WHISTLEBLOWING

Hargreaves Lansdown promotes a safe and honest culture which encourages employees to raise any malpractice concerns such as a suspected employee fraud, a bribery & corruption issue, a danger to health and safety, or the concealment of rule breaches.

Guided by the principles under the Public Disclosure Act 1998, HL's policy applies to all persons working for the company, whether full-time or part-time, employed through an agency or as a contractor.

The policy outlines the request for anonymity and confidentiality and is underpinned by direction outlined in the Whistleblowing Procedure Policy, Grievance Policy and Equal Opportunities and Harassment (Dignity at Work) Policy. Colleagues undertake training in this yearly.

PASSWORD POLICY

As a leading financial services company, it's right that Hargreaves Lansdown pays close attention to their data and resources and how this is accessed. Passwords are a vital aspect of computer and information security and this policy outlines the robust guidance of password protection standards.

The policy is underpinned by the Computer Misuse Act 1990 and contains advice for system owners to understand the benefits and limitations of passwords and passphrases.

TRANS AND NON-BINARY EQUALITY POLICY

Hargreaves Lansdown is dedicated to improving the inclusivity and diversity of our workforce. As part of that, HL has worked with Kaleidoscope (HL's LGBTQ+ colleague network) to create our Trans and Non-Binary Equality Policy.

This policy sets out a clear commitment to trans equality, uplifting the rights of trans and non-binary people and putting clear provisions in place to support people to live authentically at work, including during transition, should they need it.

HL celebrates and values the diversity of its colleagues and understands that gender is more complex than the traditionally understood binary and recognises that trans and non-binary rights are human rights.

We are also actively working to improve the client experience to make sure we are accessible and inclusive to all clients.

MENSTRUATION AND MENOPAUSE POLICY

Hargreaves Lansdown is committed to providing an inclusive and supportive working environment for all colleagues. We understand that, for a variety of reasons, anyone can be affected by hormonal changes during their lives and that they might require workplace adjustments because of this.

This policy focusses specifically on menstruation and the menopause in the aim to raise wider awareness and understanding, outline support available to colleagues and foster an environment in which colleagues can openly and comfortably instigate conversations with management and the wider team.

FAMILY FRIENDLY POLICIES

Hargreaves Lansdown recognises the importance of balancing work life with family responsibilities. We encourage our colleagues to spend time with their families and want to give parents flexibility in considering how to best care for their children. These policies include parenting leave entitlements, and how HL supports our colleagues and their families.

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Hargreaves Lansdown is committed to building a diverse and inclusive workforce

CORPORATE AFFAIRS

ENVIRONMENTAL PROGRAMME

As a leading FTSE 100 financial services company, HL is committed to setting a positive example for clients and the community by integrating sustainable social, ethical and environmental considerations into operations with a long term view of managing our wider environment and social footprint.

HL acknowledges the impact it has on the environment and climate change is committed to the following:

- Identifying and assessing environmental aspects to determine those that are significant.
- Providing all employees with relevant education and information to encourage them to live and work in an environmentally responsible manner.
- Focusing on continual improvements in environmental performance and activity by means of a proactive Environmental, Sustainability and Climate Change Group.
- Aligning the company strategy to support the delivery of the United Nations Sustainable Development Goals.

PROCUREMENT POLICY

HL's procurement processes are guided by the consideration of the corporate responsibility practices of suppliers to ensure that there are no conflicts with Hargreaves Lansdown's values.

HL ensures there's a clear responsibility framework for outsourced services and activities e.g. senior management ownership, relationship with/obligations to clients, HL's authorisation status. The company looks to avoid undertaking the outsourcing of important operational functions in such a way as to impair materially:

- the quality of its internal control;
- ability of the FCA to monitor HL's compliance with all obligations under the regulatory system.



This policy outlines Hargreaves Lansdown's environmental and ethical considerations via procurement processes and encourages suppliers and business partners, to adopt good environmental practices and where appropriate, collaborate with them on solutions to reduce environmental impact.

Employees are also discouraged from dealing with HL suppliers in their private affairs, particularly if this is likely to put them under some obligation to the supplier. This guidance is underpinned by HL's Conflict of Interest Policy.

POLITICAL INVOLVEMENT STATEMENT

Hargreaves Lansdown is apolitical. No political contribution to a candidate for public office, an elected official, a political party or political action committee, can or will be made on behalf Hargreaves Lansdown.

LEGISLATION AND REGULATION

ANTI-MONEY LAUNDERING

This policy outlines the responsibility of the Money Laundering Reporting Officer (MLRO) who will implement systems and controls sufficient to minimise the risk of HL's products and services being used to launder funds associated with criminal conduct or for terrorist financing. The responsibility ensures that HL does not have any involvement in money laundering or terrorist financing activity falls upon all management and staff. Colleagues have to undertake training once a year at least.

The policy is guided by wider legislative and regulatory obligations under:

- Terrorism Act 2000
- Proceeds of Crime Act 2002

As well as industry standards such as:

- Joint Money Laundering Steering Group
- Financial Action Task Force (FATF).

The policy provides the MLRO with a basis to implement systems and controls that enable it to identify, assess, monitor and manage money laundering risks.

DATA PROTECTION

Respect for the private and family life of individuals is a fundamental human right. Hargreaves Lansdown processes a large amount of personal data and upholding the right to privacy is of critical importance. HL follows obligations outlined in The General Data Protection Regulation, The Data Protection Act 2018 and The Privacy and Electronic Communications Regulations, in order to remain transparent and accountable.



Guided by the Data Protection Officer (DPO), HL complies with the following:

- Ensuring personal data is used fairly, limited to what is necessary, stored accurately and up to date and retained for no longer than required
- Demonstrating compliance with data protection principles and direct marketing obligations
- Safeguarding personal data when entering relationships with other organisations
- Reporting any personal data breaches accurately and promptly

- Ensuring initial and ongoing training to employees to ensure they are appropriately aware of data protection obligations

Data subjects trust HL to process their personal data based on legitimate purposes. It's incumbent upon HL to be responsible and accountable for processing activities in order to respect the privacy rights of individuals. All HL colleagues have to undertake training each year on this.