

# HL SUPPLIER CODE OF CONDUCT

Document Version: 0.1  
Date of Issue: April 2023

HARGREAVES  
LANSDOWN

## 1. Introduction

At HL we apply our values to every aspect of the Hargreaves Lansdown group of companies (HL). We put the client first, go the extra mile, do the right thing, make it easy and do it better, for our people, our community, the environment, and our clients. Our values are no different when it comes to our suppliers and HL aims to work with suppliers who align with our values, and meet the minimum standards outlined in this Supplier Code of Conduct (**Code**).

This document is intended to complement our contracts with suppliers and the rules we set out when we procure our goods and services, which will always take precedence.

## 2. HL Values

- **Put the client first.** It's their future in our hands. We're relentless in our pursuit to deliver the best client experience – always thinking of how our services can benefit clients, not us.
- **Go the extra mile.** For our clients, and for our colleagues. We focus on what we need to do, then do it well – taking every opportunity to delight, inspire and reassure.
- **Do the right thing.** Every time. We're fair, honest, and upfront. It's why our clients trust us, and how we earn their loyalty. Always admitting our mistakes then putting them right.
- **Make it easy.** What we do is serious, but that doesn't mean it needs to be complex. Everything should be easy to access, understand and do – giving our clients confidence to make important decisions.
- **Do it better.** Energetically leading the way, we seek every chance to do things better. And we dare to call out what's not working. Then we fix it.

## 3. Updating this Code

HL will undertake an annual review of this Code and has the right to modify this Code from time to time to reflect change in law, regulations and working practices. Where we update the Code, we will provide you with a copy of the updated Code in writing.

## 4. Definitions

- **Code** means this HL Supplier Code of Conduct.
- **HL** means the Hargreaves Lansdown group companies.
- **Operational Resiliency** means the ability of entities to prevent, adapt, respond to, recover, and learn from operational disruptions.
- **Representative** means the Supplier's suppliers, vendors, agents, contractors, and subcontractors who are involved in HL's supply chain.
- **Supplier** means a company, partnership or individual that provides goods or services to one or more members of the HL group of companies and the phrase "Supplier" in this Code should, where relevant, also include all officers, employees, and agents of the Supplier.

## 5. Compliance with Code

The Supplier should comply with this Code and promote this Code to its Representatives.

## 6. Compliance with Laws and Regulations

The Supplier should comply with all applicable laws and regulations in all of the countries in which the Supplier operates.

## 7. Human Rights

HL expects its suppliers to support and respect the protection of internationally recognised human rights, (at a minimum, as those expressed in the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work), and to ensure that they are not complicit in human rights abuses, including modern slavery, human trafficking, forced labour, the use of child labour, bonded labour, indentured labour and prison labour.

HL is committed to human rights being respected in our supply chain, including the prevention of human trafficking and modern slavery, for which we have a zero-tolerance approach. In line with our Modern Slavery Statement, [http://www.hl.co.uk\\_Modern-Slavery-Act.pdf](http://www.hl.co.uk_Modern-Slavery-Act.pdf). We expect our suppliers to comply with all applicable anti-slavery and human trafficking laws, statutes, and regulations, to be able to demonstrate their compliance against the Modern Slavery Act 2015 and provide their own Modern Slavery policies or statements and supporting information, upon request.

## 8. Equal Opportunities

HL is an equal opportunities employer and is committed to building a diverse workforce at all levels and create an inclusive culture for all. Read more about HL's commitment to Diversity and Inclusion, as well as our latest Gender Pay Gap Report on our website: [Corporate Social Responsibility | Hargreaves Lansdown \(hl.co.uk\)](#)

The Supplier should have policies that reflect the requirements of the Equality Act 2010 (or the relevant equality legislation in the countries in which they operate).

## 9. Freedom of Association

The Supplier should respect, and should not interfere with, the right of workers to decide whether to lawfully associate with groups of their choice, including the right to form or join trade unions and to engage in collective bargaining.

## 10. Health and Safety

The Supplier should comply with applicable health, safety and environmental (**HSE**) laws and regulations, and seek to continuously improve HSE performance. When working on HL's premises, Suppliers are required to comply with the HL Group Health and Safety Policy which will be made available to people working on HL's premises, or is available on request.

## 11. Remuneration

The Supplier should compensate all workers at a level that as a minimum meets the higher of: (a) the minimum wage and benefits established by applicable law; (b) collective agreements; (c) industry standards; and (d) an amount sufficient to cover basic living requirements.

HL is proud to be an accredited Living Wage employer, certified by the Living Wage Foundation. HL encourage all suppliers to pay the UK Living Wage as a minimum, and all qualifying Suppliers who work at our UK premises must pay their employees at least the UK Living Wage.

## 12. Prompt Payment

Paying suppliers or partners promptly and within the agreed payment terms is not only an ethical responsibility but economically beneficial for all parties and the wider economy. HL is a signatory of the Prompt Payment Code which demonstrates our commitment to prompt payment. Suppliers should endeavour to comply with the standards set out in the Prompt Payment Code and to be fair and reasonable in their payment practices.

## 13. Data Protection and Security

The Supplier should comply with all data protection laws and requirements (including the UK GDPR) when processing any personal data on HL's behalf and should not undertake or omit to undertake anything which would put HL in breach of such laws and regulations.

The Supplier should maintain and apply appropriate security measures that comply with industry standards to safeguard our data, confidential information, trade secrets and intellectual property, along with the integrity and availability of the products or services being provided.

## 14. Bribery and Corruption

The Supplier should comply with all applicable laws, statutes, codes, and regulations relating to the prevention of bribery and corruption (including but not limited to the Bribery Act 2010). To that end, the Supplier should not accept, offer, promise, pay, permit, or authorise:

- (a) bribes, facilitation payments, kickbacks, or illegal political contributions.
- (b) money, goods, services, entertainment, employment, contracts, or other things of value, in order to obtain or retain improper advantage; or
- (c) any other unlawful or improper payments or benefits.

The Supplier should have policies in place to prevent fraud, bribery and corruption, market abuse, money laundering, tax evasion and any other improper payments, or inducements within its business to only work with Representative that demonstrate similar commitments.

HL are committed to the highest standards of personal and professional conduct, where we maintain independence and objectivity. At HL we have taken the decision that we are unable to accept any gifts from our suppliers. We understand that gifts are generally given as a token of appreciation, but to keep things clear and simple, HL will not be able to accept any gifts. We request that you respect this decision and do not offer any gifts (no matter what the value) to our HL colleagues.

HL recognise the importance of building relationships with our suppliers. However, the primary focus of any hospitality event offered by the Supplier should be business-centred and conducive to business discussions. Therefore, we request you consider this when offering hospitality to our HL colleagues. Entertainment events such as sporting events, cultural events and concerts should not be offered.

## 15. Anti-competitive Conduct

The Supplier should not engage in any anti-competitive conduct, including any form of agreement or understanding with competitors to fix prices, rig bids, allocate customers or restrict supply.

## 16. Conflict of Interest

A conflict of interest is any situation where one or more persons or entities have competing interests and the serving of one interest may involve detriment to another. The Supplier should have procedures in place to identify actual and potential conflicts with HL or HL's clients. The Supplier should avoid any situation where its interests (financial or otherwise) conflict with the contracted duties that it owes to HL and/or HL's clients. The Supplier should disclose, (as soon as they become aware) to HL any actual or potential conflicts of interest.

## 17. Representatives

The Supplier should carry out appropriate due diligence on its prospective Representatives to satisfy itself that the prospective Representative meet the requirements and principles that are covered in this Code. The Supplier should ensure that it monitors its Representatives' compliance with this Code.

## 18. Risk Management

The Supplier should have in place effective risk management systems which will allow them to: (a) adhere to this Code; (b) adequately manage the risks associated with the areas in which they operate; and (c) continuously improve their performance.

The Supplier should ensure that their systems and procedures are sufficient to mitigate and avoid any potential negative impact on HL's brand and reputation, including risks related to change and change management.

The Supplier should provide reasonable notice of new and changing risks, which will allow material risks, such as commercial and operational risks to be mitigated and ensure that services to HL continue. This might include reasonable notice of changes to goods/services supplied, adequate information concerning type and scale of change, impact, and dedicated assistance from the Supplier to ensure any change does not interrupt existing services.

The Supplier should work with HL to ensure that risk is allocated to the party best able to manage it. The Supplier should not pass down risk inappropriately to subcontractors and should not assert that they can manage risk that is in fact better managed by another party. The Supplier should be, (and should encourage their subcontractors to be), open and transparent when identifying, assessing, and mitigating risks relating to the goods and services supplied to HL.

## 19. Operational Resilience and Business Continuity

The Supplier is expected to maintain management and control frameworks to ensure operational resiliency practices are both adequate and appropriate for the areas in which they operate, ensuring the continuity and availability of our services. The Supplier should share such management and control frameworks with HL, as and when requested.

## 20. Environment

At HL, we are passionate about environmental sustainability and are committed to managing our environmental impact.

Read about our environmental aims on our website:

[Environmental sustainability | Hargreaves Lansdown \(hl.co.uk\)](#).

HL expect our suppliers to ensure business practices meet all applicable environmental laws and regulations.

HL encourage all suppliers to work together with their supply chains to minimise the environmental impact of their operations and have policies for effective environmental management and to align, where possible, to the United Nations Sustainable Development Goals.

## 21. Community

At HL, our aim is to contribute and be a positive influence in our society and local community. We are one of the largest employers in Bristol. We are proud of our heritage and support local projects to improve the city's future and we encourage all of our suppliers to adopt this approach. Please see our website for more information on our recent activity in the [Community: Community | Hargreaves Lansdown \(hl.co.uk\)](#).

As a minimum, suppliers should be aware of the impact they have on their communities, and we encourage our suppliers to look for ways to invest in their own communities and the communities in which they operate.

## 22. Self-Monitoring, Compliance and Audit

The Supplier should inform their HL point of contact (within 24 hours of becoming aware), if: (a) there is a breach of the code; (b) it does not have appropriate systems in place to monitor its compliance with this Code; and/or (c) it is not able to comply with this Code for the duration of its relationship with HL. The Supplier may be required to provide written acknowledgement of their adherence to this Code, and HL (or a designated firm) may conduct audits to verify the Supplier's compliance with this Code.

## 23. Whistleblowing

Inappropriate conduct can impact HL's clients, colleagues, shareholders, and/or the general public, and can cause significant damage to our business – reputationally, operationally and financially. The Supplier should monitor its compliance with the Code and should report any breaches (actual or suspected) of this Code as soon as possible by informing their HL point of contact. The Supplier should not retaliate or take disciplinary action against any worker that has, in good faith, reported breaches of this Code or questionable behaviour, or who has sought advice regarding this Code.

If you wish to raise a concern anonymously, please do so via your HL point of contact, or by using our independent, confidential reporting service provided by EthicsPoint.

You can do this by phone (0800 056 9427)

or via the [online form](#). Alternatively, you can visit the HL Whistleblowing Web Page at

[Whistleblowing policy | Hargreaves Lansdown \(hl.co.uk\)](#) or scan our QR code for immediate access to our available reporting channels.



## 24. Breach and Remediation

In the event that a Supplier breaches this Code, HL will take appropriate action, which may include requiring the Supplier to put in place a remediation plan, or the amendment or termination of the Supplier contract, where this right has been contractually agreed in advance by both parties.