

HARGREAVES LANSDOWN'S HUMAN RIGHTS POLICY

HARGREAVES
LANSDOWN

April 2023

Hargreaves Lansdown is committed to being a responsible business and upholding Human Rights. This policy supports the key principles established in 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.

PURPOSE OF THE POLICY

This Policy is designed to show our human rights priority areas, where we have mapped our actions against the relevant articles of the Universal Declaration on Human Rights.

It goes on to reference relevant HL policies and processes which are relevant to how we respect human rights in our approach to our employees, our clients, our suppliers, and our products. It is implemented throughout Hargreaves Lansdown and is reviewed on an annual basis.

SCOPE AND APPLICATION OF THE POLICY

This policy demonstrates how we uphold our human rights priority areas and then references relevant policies and approaches at HL which support these areas.

This policy applies to all legal entities across the HL Group. Upholding this policy is applicable to all those who work for HL; whether full-time or part-time, employed through an agency or as a contractor.

POLICY PRINCIPLES AND REQUIREMENTS

Hargreaves Lansdown has altered the language used in the below articles of The Universal Declaration of Human Rights to be inclusive and gender neutral.

Hargreaves Lansdown respects and considers all articles of The Universal Declaration of Human Rights. We have listed the articles which are most salient for Hargreaves Lansdown's operations below and mapped the relevant parts of the policy to them. We have included further information where relevant.

Article 1: All human beings are born free and equal in dignity and rights. They are endowed with reason and conscience and should act towards one another in a spirit of togetherness.

Hargreaves Lansdown ensures a positive culture is maintained throughout the organisation in all operations. [The HL Way](#) promotes that all colleagues are treated with dignity and respect, ensuring their rights and freedoms.

Article 2: Everyone is entitled to all the rights and freedoms set forth in this Declaration, without distinction of any kind, such as race, colour, sex, language, religion, political or other opinion, national or social origin, property, birth or other status.

Furthermore, no distinction shall be made on the basis of the political, jurisdictional or international status of the country or territory to which a person belongs, whether it be independent, trust, non-self-governing or under any other limitation of sovereignty.

[Hargreaves Lansdown values diversity](#) and does not discriminate based on any of the reasons outlined in Article 2. Within the business, Hargreaves Lansdown currently supports a number of diversity networks; including an LGBTQ+ Group, a Cultural Diversity Group, a Gender Diversity Group, a Disability group and a Wellbeing group. Hargreaves Lansdown also offers a multi-faith space for prayer and reflection.

Inclusion is a core part of Hargreaves Lansdown's culture and a non-negotiable expectation of all colleagues and leaders. This is reflected in our work around recruitment, retention and promotion, culture, and behaviour.

Article 4: No one shall be held in slavery or servitude; slavery and the slave trade shall be prohibited in all their forms.

Our supply chain model Terms of Business includes a requirement

to comply with the Modern Slavery Act 2015. It is also highlighted in our Supplier Code of Conduct. Hargreaves Lansdown are aware of modern slavery considerations as part of Hargreaves Lansdown's anti money laundering activities and our vulnerable clients approach.

Hargreaves Lansdown continues to be a signatory of the United Nations Principles of Responsible Investment and consider environmental, social and governance factors (including slavery and child labour) when making investment decisions.

Hargreaves Lansdown publishes a modern slavery statement annually. All colleagues are reminded of this statement and its importance annually. Hargreaves Lansdown's full [Modern Slavery statement](#)

Article 5: No one shall be subjected to torture or to cruel, inhuman or degrading treatment or punishment.

Hargreaves Lansdown treats all colleagues fairly, honestly, and transparently. Hargreaves Lansdown has a formal Grievance Procedure which aims to try and arrive at a mutually satisfactory solution of the concerns raised as quickly as possible.

Article 18: Everyone has the right to freedom of thought, conscience, and religion; this right includes freedom to change their religion or belief, and freedom, either alone or in community with others and in public or private, to manifest their religion or belief in teaching, practice, worship and observance.

Hargreaves Lansdown is committed to promoting freedom of thought and expression. Within Hargreaves Lansdown's Employee Relations Policy there is an explicit commitment for each colleague to ensure a culture free from discrimination, unreasonable or unwanted behaviour, where it is safe to speak up or 'call out' bad behaviour.

Hargreaves Lansdown's Bullying and Harassment Standard outlines how harassment against the 9 protected characteristics is unlawful as defined in the Equality Act 2010, this includes religious practices and beliefs.

Hargreaves Lansdown is committed to make reasonable adjustment for religious practices and beliefs and maintains a multi-faith prayer and spiritual reflection space within the office.

Hargreaves Lansdown supports colleague advocacy through social media that shares and amplifies the messages Hargreaves Lansdown shares on social media. Hargreaves Lansdown publishes annually 'Colleague Advocacy in Social Media – Guidance' which outlines what constitutes advocacy and utilises the principle of 'common sense' and Hargreaves Lansdown's values when colleagues share content in relation to Hargreaves Lansdown.

Article 19: Everyone has the right to freedom of opinion and expression; this right includes freedom to hold opinions without interference and to seek, receive and impart information and ideas through any media and regardless of frontiers.

Hargreaves Lansdown actively seeks the opinion and expression of colleagues from all levels of the business. Hargreaves Lansdown obtains feedback via a variety of channels which includes the opportunity for anonymous feedback.

Article 23:

- Everyone has the right to work, to free choice of employment, to just and favourable conditions of work and to protection against unemployment.
- Everyone, without any discrimination, has the right to equal pay for equal work.
- Everyone who works has the right to just and favourable remuneration ensuring for themselves and their family an existence worthy of human dignity, and supplemented, if necessary, by other means of social protection.
- Everyone has the right to form and to join trade unions for the protection of their interests.

Hargreaves Lansdown believes in clear, fair, and transparent pay and reward. Hargreaves Lansdown pays the Real Living Wage. Hargreaves Lansdown offers Maternity, Paternity, Adoption and Shared Parental pay. Flexible and part-time working is also available, where roles allow.

Hargreaves Lansdown respects the right of colleagues to join and seek advice from a trade union of their choice whether they are directly employed or not.

Gender equality is at the core of human rights and gender inequality is prohibited by most human rights treaties. Hargreaves Lansdown supports the progression of women at all levels and publishes annual reports regarding the Gender Pay Gap and senior representation targets as part of the Women in Finance Charter.

Hargreaves Lansdown has a family leave policy which details maternity, paternity, and adoption leave, pay, and leave for emergency circumstances.

Hargreaves Lansdown is also a Period Friendly Employer and are proud to be a corporate partner of Period Friendly Bristol.

Article 24: Everyone has the right to rest and leisure, including reasonable limitation of working hours and periodic holidays with pay.

Hargreaves Lansdown provides all colleagues with holiday entitlement above the statutory minimum. There is also a requirement for colleagues to take a minimum of 20 days' holiday each year (pro-rated if colleagues work part-time hours). If colleagues do not book holiday, Hargreaves Lansdown reserves the right to allocate holiday to them, so that they use part of their holiday entitlement.

INCORPORATION OF HUMAN RIGHTS AT HL

OUR COLLEAGUES

The following policies and approaches promote human rights directly or indirectly covering a range of issues including:

- [The HL Way](#), an internal commitment to a standard of behaviour, but also a public declaration of our values, principles and beliefs.
- The Employee Relations Policy
- [Inclusion and Diversity](#)
- [Employee networks](#)
- [Performance and Reward](#)
- [Speak Up – Our Whistleblowing policy](#)

Hargreaves Lansdown takes a zero-tolerance approach to bribery and corruption and upholds all laws relevant to countering bribery and corruption, including the Bribery Act 2010. Details of our approach are part of our Group Anti-Bribery and Corruption Policy.

OUR CLIENTS

Hargreaves Lansdown considers the client as a key stakeholder to uphold a fair, transparent, and honest standard with. Consequently, Hargreaves Lansdown actively considers human rights with its treatment of clients, its relationship with vulnerable clients,

guided by our vulnerable clients policy, and how it handles complaints.

Hargreaves Lansdown recognises its clients have a wide variety of knowledge and skills in relation to investment & savings products and can be affected by a range of characteristics of vulnerability at different stages of their life, including before and during their relationship with Hargreaves Lansdown. [Further information here](#). All Hargreaves Lansdown colleagues are required to complete Vulnerable Client training.

Good complaint handling is an integral part to delivering Hargreaves Lansdown's strategy and is captured in our complaints handling policy. We have put in place adequate policies, procedures, systems, and controls to ensure that all complaints are dealt with promptly and fairly. This is in line with the FCA's disputes resolution: complaints sourcebook.

OUR SUPPLIERS

Hargreaves Lansdown has created a Supplier Code of Conduct that is shared with all new suppliers when onboarding services to Hargreaves Lansdown.

The Code covers many areas and includes a section on Human Rights where Hargreaves Lansdown asks that the supplier should comply with all internationally recognised human rights understood, at a minimum, as those expressed in the International Bill of Human Rights and the principles concerning fundamental rights set out in the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work.

There is also a clause on Slavery, Human Trafficking and Child Labour where Hargreaves Lansdown asks that the supplier should comply with all applicable anti-slavery and human trafficking laws, statutes, regulations and codes from time to time in force including, but not limited to the Modern Slavery Act 2015 in any part of its supply chain. This includes, but is not limited to, not supporting or engaging or requiring any forced labour, the use of child labour, bonded labour, indentured labour and prison labour.

As part of Hargreaves Lansdown's due diligence processes that the procurement and vendor management team undertake when onboarding new suppliers, Hargreaves Lansdown

ask that the proposed new supplier complies with the Code and with Modern Slavery requirements as defined by section 54 of the Modern Slavery Act 2015.

Hargreaves Lansdown further asks questions regarding Fair Remuneration and Real Living Wage considerations. Hargreaves Lansdown expects its suppliers to ensure fair remuneration, (ensuring compliance with relevant governments' minimum wages or industry standards approved on the basis of collective bargaining, whichever is higher), and working conditions for their workforce. Benefits must meet both legal minimums and industry standards without unauthorised deductions.

Hargreaves Lansdown expects its suppliers to pay the Real Living Wage as a minimum to any employees providing goods or services and to those who physically work within Hargreaves Lansdown's UK premises. As part of this process, Hargreaves Lansdown asks that the supplier confirms whether their company offers Fair Remuneration and/or is compliant with the Real Living Wage, (as applicable). On a yearly basis Hargreaves Lansdown reviews those suppliers that may fall at risk of not complying with the Real Living Wage to ensure their continued compliance.

OUR PRODUCTS

The HL Select fund managers and appointed managers of segregated mandates will not invest in persistent violators of the United Nations Global Compact (UNGC) principles. The UNGC is a set of ten internationally endorsed standards on human rights, labour, the environment, and corruption. Where Hargreaves Lansdown manages investment solutions, such as on our Wealth shortlist, HL branded funds or our Workplace Solutions, all funds are monitored for any exposure to UNGC

violators. We will engage with the relevant manager to ensure they are managing this risk.

GLOSSARY

Employee: Employee includes all those who work for HL, whether full-time, part-time, employed through an agency or as a contractor.

HL Group: Hargreaves Lansdown plc is the holding company for the Hargreaves Lansdown group of companies (the 'Group').

The Group conducts the majority of its business through four regulated entities: Hargreaves Lansdown Asset Management Limited ("HLAM"); Hargreaves Lansdown Fund Managers Ltd ("HLFM"); Hargreaves Lansdown Advisory Services Limited ("HLAS"), and Hargreaves Lansdown Savings Limited ("HLSL").

Policy: A company approved approach, principle(s) or 'plan of action', used to set company direction regarding an activity or set of activities.

Standard: Standards are quantifiable requirements that processes must meet to comply with a Policy.

This statement has been approved by the Hargreaves Lansdown plc board of directors.

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