

HG&Co Ethical Policy

HG&Co's Ethical Policy has been established to set standards and provide guidelines regarding the way HG&Co operates in ethical matters. It is important to retain this set of core principles in our approach to doing business on a daily basis. We are B Corp and Ecovadis certified, meeting the highest standards of social and environmental performance, and we are committed to reducing the impact of our operations on the environment.

HG&Co Limited is a member of Sedex (Sedex Reference N°: ZS1068818) which means that we have committed to continuous improvement of ethical standards within the supply chain.

In addition to our own core principles detailed in the sections below, HG&Co work to the Ethical Trading Initiative (ETI) base code as follows:

- Employment is freely chosen
- Freedom of association and the right to collective bargaining are respected
- Working conditions are safe and hygienic
- Child labour shall not be used
- Living wages are paid
- Working hours are not excessive
- No discrimination is practiced
- Regular employment is provided
- No harsh or inhumane treatment is allowed

Employees

- We value employees as a key resource. An atmosphere of good employee communication, involvement and responsibility both individually and as a team is of central importance. The personal development of employee talent is strongly encouraged and we are Investors in People accredited.
- Every employee has an equal opportunity for personal recognition and career development, regardless of personal background or belief. No form of discrimination or harassment will be tolerated. An important part of this policy is recruiting, selecting, rewarding and promoting people who demonstrate behavior which reflects the Company's Values and who show individual initiative and commitment in their role.
- Agency Staff who work for us are provided by reputable agencies who are audited every six months and must have a Gangmasters and Labour Abuse Authority license.

Customers

- Everybody must play their part in providing quality and efficient service to customers. We believe that integrity in dealings with customers is a prerequisite for a successful and sustained business relationship. Personal contact, helpful and responsive action are features of the service we provide to develop long term relations with our customers.

Suppliers

- We aim to develop relationships with suppliers based on mutual trust, and all dealings will be conducted in a professional manner. We also undertake to pay our suppliers according to agreed terms.
- We ask all our suppliers of raw materials, packaging or directly associated services to commit to our Ethical Trade Policy.

Community

- We seek to comply with all legislation affecting our operations. We will seek to serve and support the community in which we operate by minimizing/optimizing our impact, providing services efficiently and profitably, and by providing good employment opportunities and conditions. We will take into account the concerns of the wider community including both national and local interests.

The Environment and Sustainability

We are concerned with the conservation of the environment in its broadest sense and recognise that certain resources are finite and must be used responsibly. Sustainability is at the heart of our family business. The future is as important as today to ensure we protect the environment for our next generation.

We therefore:

- work with others toward a consensus on environmental quality standards which are desirable and attainable.
- aim to continuously improve all aspects of the business in respect of environmental and sustainable issues.
- Pay particular attention to environmental issues including the conservation of energy and natural resources, the control of noise levels, recycling of waste material and the utilisation of non-polluting technology.
- Please see our Sustainability Policy for detailed information.

Health & Safety

HG&Co provides safe working conditions for all of its visitors and employees and will do all that is reasonable and practicable to:

- Protect the health, safety and wellbeing of our employees.
- Implement working practices to prevent personal injury and damage to property.
- Make all employees aware of risk assessments and raise awareness of their own responsibilities for the health and safety of themselves and others.
- Please see our Environmental, Health & Safety and Wellness Policy for more details.

Social Responsibility

- We are committed to, and encourage collaboration with, organisations that operate non-exploitative employment practices in their own businesses and supply chains throughout the world.

Conflict of Interest and Anti Bribery

- We do not allow bribery or tolerate anti-competitive practices and requires employees to seek to avoid conflicts of interest and to disclose any that do exist. Employees must ensure that their actions are not affected by conflicts of interest. This covers the receipt or giving of gifts or hospitality without due authorisation which will only be provided for gifts and hospitality of nominal value.
- Please see the Gifts and Hospitality section of our Handbook for further information.

Human Rights and Modern Slavery

- We are committed to the prevention of any violation of established Human Rights of any kind, particularly where child labour or undesirable forced acts are involved.

- Please see our Human Rights and Modern Slavery Policy for detailed information. This policy also outlines how to raise any concerns or suspicions in any parts of the business or supply chains.
- Our policies are highlighted to all employees via inclusion in our Company Handbook and/or posting on notice boards and through training.
- Please see our Human Rights and Modern Slavery Commitment for detailed information.

Information & Records

- We regard information for the purpose of its business as a corporate asset which must be protected against loss of availability, infringement and improper disclosure. We seek to ensure as far as reasonably practicable, that this information is protected. This applies also to intellectual property including inventions, trade secrets, technical information, product design, production expertise, customers' information or other commercially sensitive information.
- Please see our GDPR Privacy Notice for detailed information.
- Honesty, completeness and accuracy of records are vital. Records of transactions should be maintained in an accurate, complete, transparent and timely manner in accordance with accounting principles.
- Personal data will be held securely and managed at all times in accordance with relevant legislation.

HG&Co believes that implementation of this Ethical Policy:

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| • promotes a culture of ethical behavior throughout the organisation | • protects our integrity and enhances our reputation |
| • sets clear standards for employees | • supports the principles of good corporate governance. |
| • makes good business sense | |

This Policy was originally agreed by the Board and seeks to be reviewed and updated annually.