

Corporate Social Responsibility Policy

Last Reviewed: June 2025

Hamilton Riley Ltd (or “the Company”) believes that it is important for the Company and its employees to maintain high ethical standards in order to preserve its reputation in the marketplace. Good ethics are important to ensure that Hamilton Riley Ltd meets not only its objectives in a fair and equitable manner but its wider social responsibilities externally. In addition, Hamilton Riley Ltd is committed to ensuring high ethical standards within the workplace.

Procedure

All employees are required to adhere to Hamilton Riley Ltd 's policy and procedure on business ethics. Employees who are faced with a potential breach of the business ethics code or have doubts about an ethical choice they are facing should, in the first instance, speak to their line manager.

Hamilton Riley Ltd has a Code of Conduct which employees are expected to abide by.

The following areas are included in this procedure. However, this list is not exhaustive and will be developed as required.

1. Data protection/Access to employee data.
2. Whistleblowing.
3. The giving and receiving of gifts.
4. Confidentiality.
5. Relationships with competitors, suppliers, advertisers, etc.
6. Equal opportunities, discrimination and harassment.
7. Moonlighting.
8. The environment.

1. The Data Protection Act 2018 requires that eight data protection principles be followed. Employees should ensure that they understand how data protection impacts on their particular role, in particular with regard to external suppliers and customers.
2. Hamilton Riley Ltd encourages a free and open culture in its dealings between its management, employees and all people with whom it engages in business and legal relations. We recognise that effective and honest communication is essential if malpractice is to be effectively dealt with and the Company's success ensured.
3. Hamilton Riley Ltd does not believe that the giving and receiving of gifts from suppliers and customers is appropriate. In certain circumstances gifts may constitute a bribe. An employee who receives a gift from a customer or supplier, regardless of its value, must inform his or her manager who will decide whether the gift may be kept by the employee or whether it should be returned.
4. A confidentiality clause forms part of all employees' contracts of employment. During the course of employment employees will have access to information of a confidential and sensitive nature. Employees must not disclose to a third party any confidential information; either during their employment or after their employment has ended. Confidential information includes information on the Company's present or potential customers or suppliers and any information relating to Hamilton Riley's business, including marketing, corporate or financial plans.
5. Hamilton Riley Ltd recognize that work may result in friendships and closer relationships developing. Relationships may develop not only with colleagues but suppliers and customers. It is natural for relationships to develop in a working environment. While Hamilton Riley has every respect for the privacy of its employees, it asks that all employees consider the impact that personal relationships can have on the business.
6. Hamilton Riley Ltd is committed to equality of opportunity and diversity in the workplace. It is our policy to treat all job applicants and employees fairly and equally, regardless of their sex, trans-gender status, age, sexual orientation, religion or belief, marital status, civil partnership status, race, color, nationality, national origins, ethnic origin or disability. Employees are required to conduct themselves in a way that promotes equal opportunities at all times. Employees who feel they have been discriminated against or suffered harassment should speak to a member of management immediately.
7. Employees may seek to take up separate employment with another employer or pursue outside business interests while still remaining employed by Hamilton Riley Ltd. Although we have no desire to unreasonably restrict an employee's external activities, Hamilton Riley must seek to protect its own interests and those of all its employees. Employees will not be permitted to undertake business activities or other work where Hamilton Riley Ltd considers that this is incompatible with its interests and, in any event, unless employees have obtained prior written authorization from the Managing Director

8. Hamilton Riley Ltd is committed to conserving the Earth's resources and to do what we can to reduce any negative effects it has on the environment. Employees are required to use the Company's equipment and materials wisely and reduce wastage where possible. Employees can play a positive role in helping the environment by recycling all non-confidential waste, using printers and photocopiers with care and switching off electrical equipment which is not in use.

Signed 

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Position Managing Director

Date 1st June 2025