

CODE OF ETHICS



CEO FOREWORD

“At Hanson Wade we believe in doing the right thing, no matter what. Our general rule is, if something doesn’t feel right, don’t do it – and don’t stand by while others do it either. We all have a responsibility to speak up and raise concerns, either to our managers, the senior leadership team or HR. No one will ever suffer from raising a concern in good faith.

Our strength lies in the shared values of our employees and whilst we trust that most of the time employees will instinctively know what is right and what is not, there will always be occasions when the right thing to do is less clear. Therefore, we have created this Code of Ethics as a guide to help you make decisions and do business in line with Hanson Wade standards. Please read it carefully so you understand what is required of us all as employees or business partners of Hanson Wade.

Thank you”

Phil Clark

CEO



Why do we need a Code of Ethics?

Our Code helps us make the right choices. This is important because a single poor decision can have far-reaching consequences across the business. Our Code helps ensure we always do the right thing to protect our business, our reputation, our future and, ultimately, our people.

Who is this Code for?

The short answer is everyone who works for or with Hanson Wade - employees, contractors, business partners and suppliers.

What does it mean for me?

Following our Code means obeying the law, acting with integrity, showing respect for each other and our business partners, building trust with all our stakeholders, and raising concerns if we believe something isn't right. Every one of us is responsible for behaving ethically and upholding the reputation of Hanson Wade – that is why it is important we are all familiar with the Code and use it every day.

What part do managers play?

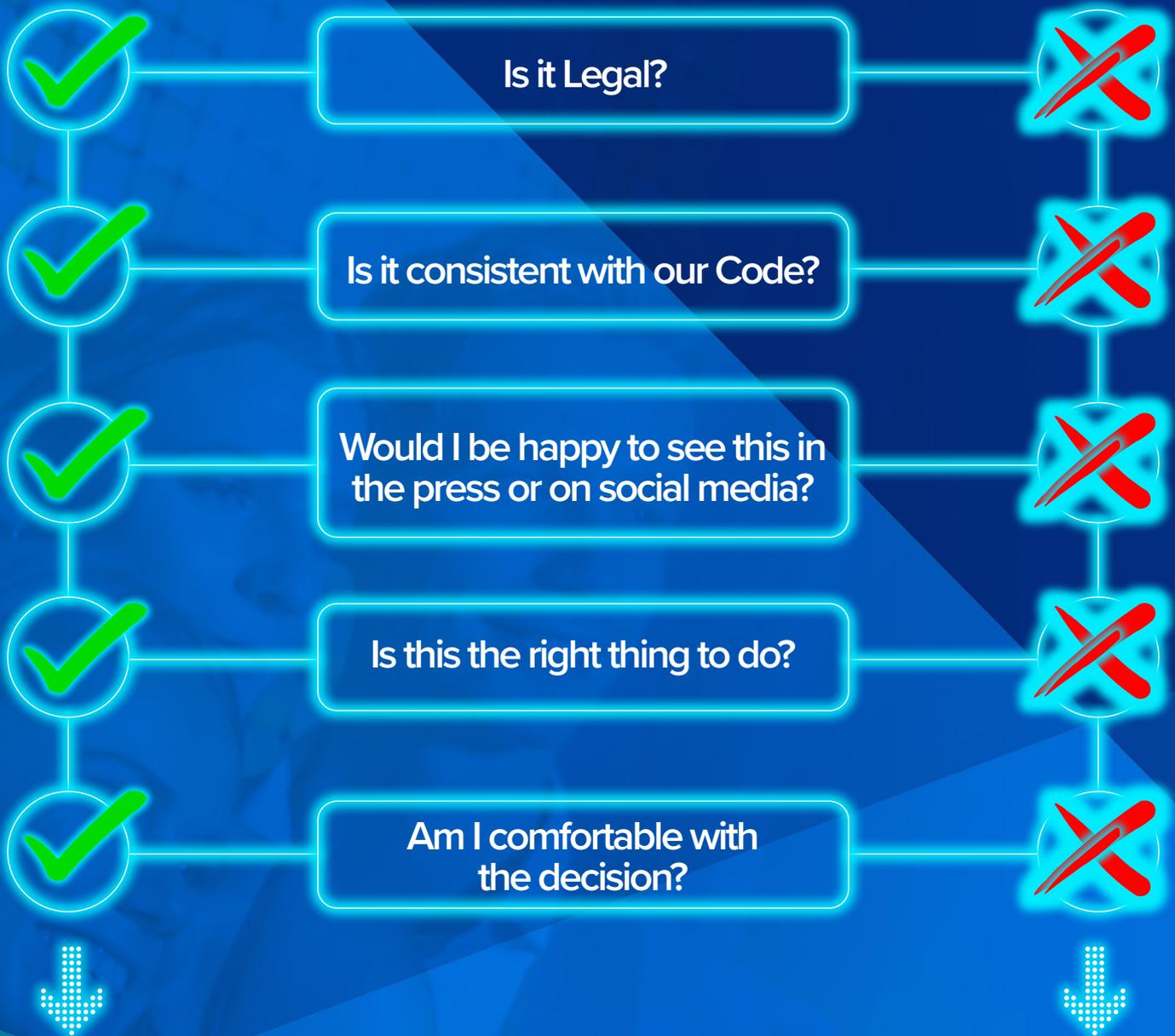
Behaving ethically starts at the top. Senior leaders and managers must set a positive example, promote the Code to their teams, create an open culture that encourages people to speak up, and protect employees who raise concerns. Managers must also escalate any breaches to HR and the ESG Leadership Group.

What happens if we don't comply with the Code?

Unethical behaviour can have serious consequences. For Hanson Wade or our business partners it could mean costly investigations and large fines, as well as long-term reputational damage. For individuals it could mean disciplinary or even legal action.

How to make an ethical decision?

Sometimes situations arise where the correct course of action is not entirely clear. To help you decide what to do, think through the issues by asking yourself the questions in the order set out opposite. Don't forget you can always discuss your dilemma with your line manager.



YES TO ALL QUESTIONS
Go ahead – or if you still have questions please ask

NO /NOT SURE
Contact HR before doing anything

Our Code

Compliance with Laws, Rules and Regulations

We will comply with all relevant laws, rules and regulation of the countries in which we operate.



Financial Integrity

All our employees play a part in protecting against fraud, money laundering and tax evasion by ensuring that they are familiar with the processes and controls in place for preventing and reporting suspected dishonest or illegal activity.



Employees

We are committed to fostering a working environment that is built on honesty, fairness and respect. We believe in a workplace where there is mutual trust, respect for human rights and no discrimination. We support the physical and mental wellbeing of our employees, ensuring safe working conditions (psychological and physical).



We will recruit, employ and promote employees solely on the qualifications and competencies needed for the role.

Customers

We are committed to treating our customers and prospective customers with fairness and respect. We will provide high quality niche information products that provide meaningful insight and connections to enable our customers to accelerate their business performance and productivity.



Shareholders

Our goal is to provide exceptional returns to our shareholders. This will be achieved through growing our business and attracting and keeping the most talented people is critical to achieving this. However, we will not put profit before anything that compromises how we conduct our business under this code of ethics.



Business Partners

We are committed to establishing mutually beneficial relations with our suppliers, customers and business partners. In our business dealings we expect our partners to adhere to business principals consistent with our own.



Competitors

We recognise that our business operates in a highly competitive environment with ever changing markets. Whilst we will be aggressive in expanding our business we will not denigrate our competitors and will respect their achievements. By working to be the best we can be, we have nothing to fear from our competitors and recognise that competition is healthy and encourages businesses to continually challenge themselves and embrace new ways of thinking.



The World

We are committed to making continuous improvements in the management of our environmental and social impact and to the longer-term goal of developing a sustainable business.



Bribery & Corruption

We do not give or receive, whether directly or indirectly, bribes or other improper advantages for business or financial gain. No employee may offer, give or receive any gift or payment which is, or may be construed as being, a bribe.



Any demand for, or offer of, a bribe must be rejected immediately and reported to management.

Conflicts of Interests

All employees, contractor and consultants working for Hanson Wade are expected to avoid personal conflicts that interfere with their responsibilities of the company. Actions or relationships that may create personal conflicts of interests should be disclosed in the first instance to management and HR.



Data and Confidentiality

We are committed to protecting the confidentiality and privacy of both our own information, and that of other organisations and customers that we work with. We comply with all applicable laws and regulations protecting confidential information, including laws on the protection of personal data and the protection of the right to privacy

