



CORPORATE AND SOCIAL RESPONSIBILITY POLICY

Introduction

Hickton seeks to be a good corporate citizen in all aspects of its operations and activities. To this end we have brought together a series of operating principles under the broad heading of Corporate Social Responsibility (CSR) to serve as a guide to staff in all aspects of their work for the company.

The principles cover all areas of operations and have been developed with reference to the relevant codes of corporate governance and best practice, including the revised Combined Code and international statements and guidelines such as the UN Universal Declaration of Human Rights and the OECD Guidelines for Multinational Enterprises. Taken together, and in addition to other statements and policies these form our CSR policy.

Ethical Business Conduct

Our Principles

We value the principles of accountability, honesty and integrity in all aspects of our business. Our policy is to conduct our business in a manner which ensures:

- fair treatment of all staff and clients
- transparency of our business policies and practices
- high standards in all matters relating to health, safety and the environment
- ethical business practices throughout our operations

We recognise that the involvement of our staff is key to the future success of the business and we have for many years adopted a policy of keeping staff fully informed on all matters affecting them. We are committed to best practice in employment matters, recognising the role this plays in attracting and retaining staff.

To succeed in delivering the best possible service to our clients, every member of staff is expected to adhere to Hickton's core values and to uphold them in the workplace. Staff are expected at all times, to exercise the highest ethical judgment and comply with laws applicable to their duties. These principles cover all staff and are set out in the company's induction.

Policies Specific to Staff

Whistle Blowing

In the event that an employee discovers a breach of company policy there is a facility for him/her to report that breach in confidence (see equal opportunities policy for details).

Outside Interests

Hickton requires that staff avoid at all times any situation which may involve a conflict of interest between them and the company.

Dealing with Clients, Stakeholders and External Parties

Hickton is committed to the provision of accurate information and fairness in all its dealings with customers, stakeholders, officials and any other external party having direct business with Hickton.

Confidentiality

Every member of staff shall respect any information which is confidential to Hickton including, but not limited to confidential knowledge or any information concerning the process used by Hickton. Breaches of confidentiality may be cause for disciplinary action.

Data Protection

We are committed to complying with the data protection principles established by the 1995 EU Directive on Data Protection. This commitment applies throughout Hickton and in all countries in which it operates. If Hickton conducts

business in a jurisdiction where stricter rules apply, then it will comply with those rules as a matter of course. All staff are responsible for ensuring compliance with the policy. Information collected may be accessible throughout Hickton but will not be disclosed to any third party in a form which identifies the individual concerned. It will not be used for marketing purposes without the individual's consent and will not be sold to third parties. Upon request, an individual will be informed of the existence, use and disclosure of his or her personal data and will be given access to that data to confirm its accuracy or amend it as appropriate.

Fair Dealings

Dealing for clients will be undertaken in an order and manner which is unquestionably fair for the client.

Malpractice

Hickton actively works to deter malpractice in its workplace, with specific attention to activities involving bribery and corruption (see separate policy). Staff are required to report anything unusual to a Director.

Use of Company Information / Assets

Staff shall use the company's computer systems, internet and intranet, and email systems for business use. Any member of staff found to have disclosed confidential information, been abusive or malicious in using these facilities, or misusing the systems in any way may face disciplinary action. Hickton strictly prohibits the use of its intranet, internet or email systems for acquiring, producing or disseminating pornography or similar material, including the use of abusive language or offensive images.

Disciplinary Procedure

The Company has a detailed formal disciplinary procedure, full details of which are contained in the Company's contracts of employment.

Corporate Governance

Background

Since its beginning in 1991, Hickton has been committed to its core business values of integrity, development, client focus, quality and teamwork. These values engender the correct attitude for optimum corporate governance. Hickton is committed to complying with good corporate governance policies.

Organisation

The Board of Directors currently comprises the Managing Director and 4 executive directors, each director brings a valued contribution to the table when making strategic decisions for Hickton.

Meetings of the Board of Directors

The Board of Directors meets as a board four times each year to review the longer term/wider strategy for Hickton and has a formal schedule of matters reserved for its decision, which includes the setting of company goals, objectives, budgets and other plans. In addition the Board meets monthly to consider the operational activities and shorter term objectives of the Company.

Internal Controls

The board has overall responsibility for Hickton's system of internal control and for reviewing its effectiveness. The internal controls are designed to cover all risks to achieving Hickton's objectives including all business, operational, financial and compliance risks. The internal controls are designed to manage, rather than eliminate, risk of failure to meet business objectives and to provide reasonable, but not absolute, assurance against material misstatement or loss. The system of internal control is embedded within the day to day operations of Hickton and is brought together using Mindmap to ensure accountability and constant review.

Community Investment

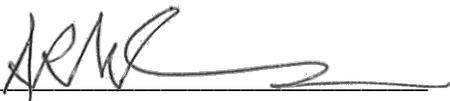
Hickton's investment has two main components, charitable giving and support for a variety of local organisations. Hickton is an active supporter of business groups and chambers of commerce local to Head office.

Charitable Donations

At the commencement of each fiscal year the Board will agree an amount which should be allocated to donations to charity and support for good causes. Hickton will aim to grow this core amount over time and, depending on the profitability of the Company, may make specific one-off donations. The amount allocated is administered by Jane Verrall (Director) after annual consultation with all Head Office staff. Proposals for the use of the funds are collected over the year and allocations are made in December. The proposals may come from the Board, from staff, and from individuals and groups.

Activities in the Community

We sponsor a range of activities in the community. These range from sponsorship of individual men and women, to sponsorship of events.

Signed 

Date January 2016

Managing Director

Review Date January 2017

Review Responsibility – Managing Director