



PUBLIC

ESG Policy

Environmental, Social and Governance Commitments. The standards that govern how HudsonRoux operates, and the disciplines it advises its clients to build.

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1.0	June 2026	Francois Roux, Principal	Initial policy issued and published.

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1 Purpose

This policy sets out HudsonRoux's commitments in relation to environmental responsibility, social conduct, and governance standards. It applies to all activities carried out under the HudsonRoux name.

HudsonRoux is a single-operator advisory practice. The scope of this policy is proportionate to that scale – but the commitments are not conditional on it. The disciplines described here are the same disciplines HudsonRoux advises client organisations to build. Practising them is part of what gives that advice credibility.

2 Environmental

HudsonRoux operates as a low-footprint practice. The primary environmental considerations are travel and energy consumption.

2.1 Travel

Client engagements are delivered in person where geography permits and remotely where it does not. Where travel is required, rail is preferred over air for journeys under three hours. Car travel is used where public transport is impractical.

2.2 Office and equipment

HudsonRoux currently operates without dedicated full time office premises. Work is conducted primarily from a home office environment, with serviced office facilities in London used as required for client meetings and engagement work. Equipment is maintained and repaired in preference to replacement where practical. Consumables are kept to a minimum.

2.3 Suppliers

Where HudsonRoux engages external suppliers, environmental conduct is a consideration in supplier selection alongside quality and cost.

2.4 Commitment

HudsonRoux will review its environmental footprint annually and identify practical steps to reduce it where material improvement is achievable.

3 Social

3.1 Conduct

HudsonRoux is committed to conducting all business with integrity, honesty and respect with clients, suppliers, counterparties and any individuals encountered in the course of an engagement. This is not a policy aspiration; it is an operating standard.

3.2 Diversity and inclusion

HudsonRoux does not discriminate on the basis of age, disability, gender, gender reassignment, marriage or civil partnership status, pregnancy or maternity, race, religion or belief, sex, or sexual orientation in the selection of clients, the appointment of suppliers, or any other business conduct. Engagements are taken on the basis of fit, relevance and mutual benefit.

3.3 Community

HudsonRoux supports charitable and community initiatives where the opportunity arises. In 2025 this included facilitating a global community book project, published in 13 countries, with all proceeds going to The Stroke Association.

3.4 Supply chain conduct

External suppliers are expected to conduct their own operations with integrity and in compliance with applicable law. HudsonRoux will not knowingly engage suppliers who exploit workers or operate in breach of applicable labour standards.

4 Governance

4.1 Legal and regulatory compliance

HudsonRoux operates in full compliance with applicable UK law, including:

- ◇ Data protection obligations under the UK GDPR and the Data Protection Act 2018.
- ◇ Anti-bribery and corruption obligations under the Bribery Act 2010.
- ◇ Tax obligations administered through HMRC.

4.2 Conflicts of interest

HudsonRoux manages potential conflicts of interest through transparency with clients. Where a conflict exists or may arise, it is disclosed to the relevant client at the earliest opportunity. HudsonRoux will not accept engagements where a conflict cannot be managed to the satisfaction of all parties.

4.3 Confidentiality

Information shared by clients in the course of an engagement is treated as strictly confidential. It is not disclosed to third parties without explicit consent, except where required by law. This obligation continues after an engagement concludes.

4.4 Financial conduct

HudsonRoux invoices accurately and promptly. Fees are agreed in advance in a signed engagement letter. No fees are charged beyond those agreed in scope.

4.5 Bribery and corruption

HudsonRoux has a zero-tolerance position on bribery and corruption in any form. No facilitation payments, inducements or improper advantages are offered or accepted in connection with any business activity.

5 Review

This policy is reviewed annually by the Principal. Material changes in the nature or scale of HudsonRoux's operations will trigger an out-of-cycle review.