

SEPTEMBER 22

CODE OF CONDUCT 2022



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& PARTNERS

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■ **Policy Statement**

The London & Partners (L&P) Code of Conduct is fundamental to how we operate as a business and our reputation within the external marketplace. Our Code of Conduct supports our mission, strategic objectives and values, and aligns with our desire to always act in an ethical, legal and professional way.

At L&P we seek to ensure that every aspect of its business is conducted in accordance with integrity and high ethical standards. This Policy provides specific guidelines to ensure that employees never put themselves, or the Company, in a position that would undermine or compromise business integrity.

■ **Scope**

This Code of Conduct (the 'Code') applies to all Board Members and Advisers, workers including employees, contractors and interns within L&P and its subsidiary companies, whether they are working in their normal base, or are travelling on company business. For ease of reference the term "employees" will be used in this code but applies to all groups and their conduct both within the organisation and when dealing with other organisations as a representative of L&P.

The acceptance of a working engagement with the company is sufficient to imply the acceptance of this code. Breach of the standards set out in the Policy could be treated as gross misconduct, and may lead to disciplinary action, up to and including dismissal. In extreme cases, behaviour that contravenes this Policy could lead to criminal or civil legal action.

■ **Code Details**

Standards

Employees are expected to give the highest possible standard of service to all of our key stakeholders including partners, funders, clients, members of the public and fellow employees, and, where it is part of their duties, to provide advice with impartiality and in good faith. Employees must always show integrity and avoid any suggestion of being influenced by improper or personal motives.

We seek to fulfil these obligations according to the original principles laid out in the Nolan Report on standards of behaviour in public life, as set out below. They apply to all employees and it is expected that they will uphold these principles as representatives of L&P.

The Nolan Principles

- **Selflessness** – Employees should act solely in terms of the public interest. They should not do so in order to gain financial or other benefits for themselves, their family or their friends.
- **Integrity** – Employees should not place themselves under any financial or other obligation to outside individuals or organisations that might seek to influence them in the performance of their official duties.
- **Objectivity** – In carrying out public business, including making public appointments, awarding contracts, or recommending individuals for rewards and benefits, employees should make choices on merit.
- **Accountability** – Employees are accountable for their decisions and actions to the public and must submit themselves to whatever scrutiny is appropriate to their office.
- **Openness** – Employees should be as open as possible about all the decisions and actions they take. They should give reasons for their decisions and restrict information only when the wider public interest clearly demands.
- **Honesty** – Employees have a duty to declare any private interests relating to their public duties and to take steps to resolve any conflicts arising in a way that protects the public interest.
- **Leadership** – Employees should promote and support these principles by leadership and example.

■ Disclosure of Conflict of Interest

Employees must endeavour to avoid duality and conflict of interest or the perception of any conflict of interest. Where any such conflict or perceived conflict arises, it must be declared at the earliest opportunity. A disclosure is required in situations where:

- **Personal Relationship:** an employee has any personal relationship with another employee of London & Partners, a partner, funder or any other organisation working closely with the company where it could reasonably be thought that this may create a conflict of interest or where there are potential confidentiality conflicts. Employees must be particularly careful of relationships with partners and other third parties and never allow such relationships to conflict with L&P best interests. Employees also must not be involved in decisions relating to disciplinary action, promotion or pay adjustment for any other employee who is a relative, partner or close friend.
- **Public Official role:** an employee accepts or performs a Public Official role, or has a family member or a close personal contact who is a Public Official with the ability to take decisions that could impact the Company.

■ **Political Neutrality**

Employees must ensure that they openly demonstrate the company's non-political nature and must not allow their own personal or political opinions to take precedence over L&P's lawful and ethical expectations, affecting their performance or objectivity at work.

■ **Equality, Diversity & Inclusion**

L&P is committed to ensuring that all employees work in an environment that promotes diversity and where there is mutual trust, respect and equal opportunities, and no unlawful discrimination. Employees and managers must:

- Treat everyone fairly and equally, without discrimination on the grounds of race, age, role, gender, gender identity, colour, religion, country of origin, sexual orientation, marital status, dependants, disability, social class or political views. This includes consideration for recruitment, redundancy, promotion, reward and benefits, training or retirement which must be based on relevant criteria.
- Not engage in any direct behaviour that is offensive, intimidating, malicious or insulting. This includes any form of sexual or other harassment or bullying, whether individual or collective and whether motivated by race, age, role, gender, gender identity, colour, religion, country of origin, sexual orientation, marital status, dependants, disability, social class or political views.

■ **Outside Commitments**

- Employees must declare any other paid work to their manager. No outside work of any sort should be undertaken in L&P offices or in working hours or using L&P facilities, equipment or materials.
- Employees must avoid accepting employment, advisory positions, or board positions seats at organisations that might affect your judgement, or it could appear to be, influenced in any way that might bring L&P into disrepute. Employees should inform their Directors before accepting any such position.
- Employees should make themselves aware of the ownership of intellectual property – a generic term that includes inventions and patents, creative writings and drawings or anything created during your time at L&P. If these are created by an employee during the course of employment, as a general rule the property belongs to L&P.

■ **Health & Safety**

L&P provides its employees with safe, healthy and secure work environments.

We comply with all applicable health, safety and environmental policies and requirements by ensuring our workspaces are clean and free from hazards and promptly addressing concerns relating to safety, health, risks or hazards within the workplace.

All L&P employees have an operational responsibility for their own health and safety, and that of their colleagues at their respective locations of work.

■ **Corruption and Bribery**

L&P takes very seriously its obligation to conduct its business without bribery or corruption, wherever in the world we are dealing. Under the Bribery Act 2010, the following are unlawful (whether done in the UK or overseas):

- Giving a bribe (whether money or some other benefit or advantage).
- Receiving a bribe.
- Bribing a foreign public official (e.g. customs official, tax official, local government officer, etc).
- Failing to prevent bribery.

Bribery means offering cash, goods, valuables, services or hospitality free of charge or at a significantly reduced rate, whether for the benefit of the person receiving the offer or for the benefit of some other person, in an attempt to persuade the person to act improperly.

Corruption is behaviour which lacks honesty or integrity. It may involve bribery, or other dishonest or unethical activity, involving the abuse of a position of trust or responsibility for dishonest gain. All employees, agents, consultants, and all representatives of L&P are expected to fully comply with the law (English law and any other law concerning bribery and corruption) as well as the standards set out in this Policy.

Employees must:

- Act with honesty and integrity, ensuring that their behaviour in business involves no bribery, corruption, inappropriate promises or similarly questionable conduct.
- Ensure that they are aware of the Company's high standards and expectations, as set out in this procedure.
- Conduct business always in compliance with the law and this procedure.

■ **Tax Evasion Facilitation**

The Company will monitor compliance with this procedure and will take very seriously any breach of it. Employees must raise any concerns about unethical conduct to the Managing Director, Strategy & Operations. L&P has a zero tolerance approach to the facilitation of tax evasion and our policy is to conduct all matters of business in an ethical manner. It is a criminal offence by a corporate entity where an employee (or person otherwise acting on behalf of L&P), deliberately and dishonestly facilitates tax evasion. A deliberate failure to report suspicious activity, or 'turning a blind eye' could also amount to a criminal offence.

Tax evasion is a criminal offence of cheating the public out of revenue or being knowingly concerned in the fraudulent evasion of tax. Tax evasion facilitation is the criminal offence of being knowingly concerned in the fraudulent tax evasion by another person; aiding or abetting tax evasion; or being involved in the commission of an offence consisting of being knowingly concerned in, or in taking steps with a view to, the fraudulent tax evasion. Employees have a responsibility for tax evasion prevention and detection. Each instance of tax evasion, or its facilitation, will be investigated and dealt with as appropriate.

■ **Modern Slavery and Human Trafficking**

At L&P we have a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains and stakeholder organisations. Employees are required to avoid any activity that might lead to, or suggest, a breach of our Modern Slavery & human trafficking statement. If an employee is found to be in breach of this policy, this could lead to disciplinary action up to and including dismissal for gross misconduct. Employees must notify the Managing Director, Strategy & Operations as soon as possible if they believe or suspect that a conflict with our Modern Slavery & human trafficking statement has occurred, or may occur in the future.

■ **Use of Financial Resources**

Employees must protect L&P's financial assets – such as cash, bank accounts and credit cards - guarding against misuse, loss, fraud or theft. They should strive to ensure value for money and to avoid legal challenge to London & Partners. Employees must only authorise commitments, expenditure, borrowing or other financial transactions in line with their role in line with L&P procurement policy and travel and expenses policy.

■ **Gifts and Hospitality**

Gifts and hospitality can only be offered and accepted in certain circumstances and must be declared in line with QP055 Gifts and Hospitality Policy. If you are in any doubt as to the suitability of accepting a gift or an invitation, you should discuss it with the Director for your area and always obtain their permission before accepting a gift or attending an event.

When on Company business, you may only drink alcohol in moderation. Refer to QP080 Events Policy.

You may not offer a gift, voucher, privilege or other payment of money or benefit in kind to a third party representative or organisation with whom L&P does business unless it has been sanctioned in writing both by an authorised person within that organisation and the respective Director of L&P. Employees, ex-employees (and their families) of L&P and all agencies connected to competitions run by London & Partners are not eligible to enter such competitions.

■ **Whistleblowing**

L&P is committed to provide transparent, fair and confidential procedures for employees and third parties to raise concerns. Where an employee has raised a concern in good faith, formally or otherwise, they have the right not to be victimised for it.

Any suspicion of wrongdoing will be treated seriously and will be reviewed and analysed in accordance with QP068 Whistleblowing Policy.

■ **Reporting Breaches**

Employees who become aware of a breach of this code or other procedures, or any impropriety have a duty to make the matter known to their line manager, CEO or Managing Director, Strategy & Operations. Board Members should inform the Chair.

The general rule is that disclosure should be made at the time the issue, concern or conflict first arises, or it is recognised that an issue or conflict might be perceived.

The Management Committee will review how to manage conflicts and breaches of the code. In certain instances, the Management Committee may determine that the Board should be made aware of particular issues in which case the CEO or Managing Director, Strategy & Operations will inform the Chair first.

■ **Confidentiality & General Data Protection**

Employees must respect and uphold the confidentiality of sensitive information about the company's partners, clients or business, during or after cessation of employment.

Employees must not use any information obtained in the course of their employment for personal gain or benefit, nor should they pass information on to others who might use it in such a way.

Employees must not communicate confidential information or documents to others who do not have a legitimate right to know. Furthermore, such information which is stored on computer systems must also only be disclosed in accordance with the requirements of the Data Protection Act. A disclosure which complies with the requirements of the Whistleblowing Policy will be regarded as an authorised disclosure.

■ **Change History**

Extensive review and rewrite.

■ **Training Requirements**

All Board members and employees must read and understand the changes

■ **Appendices**

None