

Document Ref	HR002	Document Title	Code of Conduct			
Owning Department	HR	Effective Date	03-Oct-19	Review Date	03-Oct-21	

1. 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.

We can only realise this ambition through our people and it is therefore essential that all representatives of L&P conduct themselves according to the highest standards of behaviour, in the most professional manner and with a commitment to perform their work to the best of their ability.

This Code of Conduct sets out the behaviour standards that are expected of all employees while in the workplace or while representing L&P, and identifies policies that are relevant to the conduct of our business.

2. 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. 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.

This code applies to the employees normal base of working as well as when they are travelling on company business. For more information on the expectations of employees when they are travelling on company business please refer to the Travel Guidelines for L&P Employees.

The acceptance of a working engagement with the company is sufficient to imply the acceptance of this code. A list of policies and procedures relating to this document can be found in Section 7.

3. Responsibilities

L&P expects that all employees will conduct themselves in a professional manner at all times. Employees must consider their own behaviour and the impact that this can have on others and adjust appropriately.

Employees must recognise that failure to follow this code may damage London & Partners' reputation and its work and may consequently be viewed as a disciplinary matter to be dealt with in accordance with the organisation's disciplinary procedures.

4. Code Details

4.1. 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. These principles are set out below. They apply to all employees and it is expected that they will uphold these principles as a representative 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.

4.2. Disclosure of Information

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.

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 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 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.

4.3. 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 interfere with their work.

4.4. Relationships

Employees should declare to their Manager any personal relationship that they may have 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.

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, 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.

4.5. Recruitment and Other Employment Matters

Employees involved in recruitment and hiring new employees must ensure that these are made based on merit. It is unlawful for an employee to make an appointment which was based on anything other than the ability of the candidate to undertake the duties of the role. To avoid any possible accusation of bias, employees must not be involved in an appointment where they are related to or have a close personal relationship outside of work with an applicant.

Similarly, employees 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.

4.6. 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 use L&P facilities, equipment or materials.

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.

4.7. Equality and Inclusion

London & Partners is committed to ensuring a diverse and inclusive environment free from discrimination and harassment. L&P does not tolerate discrimination or harassment in the workplace, including on the basis of age, disability, ethnicity, national origin, gender, race, color, religion, marital status, sexual orientation or other perceived differences. These principles extend to all employment decisions including recruiting, training, evaluation, promotion and reward. Employees must ensure that everyone is treated fairly, in line with the company's commitment to achieving equality of opportunity in every area of work.

4.8. Health & Safety

L&P endeavors to provide 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.

4.9. Corruption and Bribery

Employees must be aware that it is a serious criminal offence for them corruptly to receive or give any gift, loan, fee, reward or advantage for doing or not doing anything, or showing favour or disfavour to any person in their official capacity. It is important to avoid the perception as well as the fact of corruption or bribery and employees must comply with all applicable bribery and corruption laws.

4.10 Gifts and Hospitality

Gifts and hospitality can only be offered and accepted in certain circumstances and must be declared in line with the Gifts and Hospitality Policy.

4.11 Use of Financial Resources

Employees must ensure that they use public funds entrusted to them in a responsible and lawful matter. They should strive to ensure value for money and to avoid legal challenge to London & Partners.

Employees must be aware of and adhere to L&P procurement policy and travel and expenses policy.

4.12 Whistleblowing

L&P is committed to the highest possible standards of probity. In line with that commitment we expect employees, and others that we deal with, who have serious concerns about the conduct of any aspect of L&P work to come forward and voice those concerns. It is recognised that most cases will have to proceed on a confidential basis.

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

5 Mitigation

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, Operations and Governance. Board Members should inform the Chairman.

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, Operations and Governance will inform the Chairman first.

6 Change History

The following changes have been made to this document:

- Scope updated to include travelling on company business
- Link to Travel Guidelines added
- Links to related documents have been updated

7 Training Requirements

All Board members and employees must read and understand the changes

8 Related Documents

The following London & Partners document must be read in conjunction with HR002 Code of Conduct:

- HR021 Disciplinary Procedure
- QP079 Equality, Diversity & Inclusion Policy
- QP055 Gifts and Hospitality Policy
- HR020 Grievance Policy and Procedure
- IT005 IT Management Procedure
- QP036 Procurement Policy
- HR011 Reward and Recognition Policy
- QP035 Travel and Expenses Policy
- QP068 Whistleblowing Policy