

EMPLOYEE CODE OF CONDUCT

POLICY STATEMENT

London & Partners' reputation relies upon all employees upholding and promoting our aims and values. The Business Plan outlines our mission, purpose and strategic objectives.

SCOPE

This Code of Conduct (the 'Code') applies to all workers including employees, contractors and interns and their conduct both within the organisation and when dealing with other organisations as a representative of London & Partners. For ease of reference the term "employees" will be used in this code but applies to all groups.

Employees should 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 disciplinary procedures.

The acceptance of a working engagement with the company is sufficient to imply the acceptance of this code by all newly appointed employees. Links to the related policies can be found in the appendix to the code.

THE CODE

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 to with impartiality and in good faith. Employees should show integrity and at all times avoid any suggestion of being influenced by improper or personal motives.

Employees should work to the same aims and hold the same values and promote them in their conduct. The company publishes these in its Strategy, Business Plan and other documentation.

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.

2. Disclosure of Information

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 our partners, clients and the company's 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.

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. Relationships

Employees should declare 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.

Employees must be particularly careful of relationships with partners and other third parties and never allow such relationships to conflict with London & Partners best interests.

Employees, ex-employees (and their families) of London & Partners and all agencies connected to competitions run by London & Partners are not eligible to enter such competitions.

6. Appointments and Other Employment Matters

Employees involved in recruitment and hiring new employees should ensure that these are made on the basis of 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 post. In order to avoid any possible accusation of bias, employees must not be involved in an appointment where they are related to an applicant or have a close personal relationship outside of work with him or her.

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.

7. Outside Commitments

Employees must declare any other paid work to their manager. No outside work of any sort should be undertaken in London & Partners offices or in working hours or use London & Partners 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. If these are created by an employee during the course of employment, as a general rule the property belongs to London & Partners.

9. Equality

Employees should ensure that everyone is treated fairly, in line with the company's commitment to achieving equality of opportunity in every area of work.

10. 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.

11. Gifts and Hospitality

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

12. 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 should be aware and adhere to London & Partners procurement policy and travel and expenses policy.

13. Whistleblowing

London & Partners 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 London & Partners' 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.

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 COO.

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 Executive Team will review how to manage conflicts and breaches of the code. In certain instances the Executive may determine that the Board should be made aware of particular issues in which case the CEO or COO will inform the Chairman first.