

## PERSONNEL & ADMINISTRATION PROCEDURES



Procedure No:	<b>PAP1070</b>	Compiled by:	<b>D Garland-Bonner</b>	Issue:	<b>3.0</b>
Work Centre:	<b>FNC</b>	Approved by:	<b>N McDougall</b>	Date:	Aug 2011
				Reviewed:	Jul 2018
Subject:	<b>CODE OF BUSINESS CONDUCT</b>			Page:	<b>1 of 2</b>

### 1 POLICY

Frazer-Nash staff will conduct the company's business to the highest standards of professionalism, integrity and honesty and will carry out their work ethically and lawfully at all times.

The company adopts strict recruitment and security vetting procedures to ensure the authenticity of our staff's credentials and maintain our confidence that the expected standards of behaviour are maintained. The same recruitment and security vetting procedures are applied when considering permanent or temporary staff.

The code of conduct below details the company's approach to business.

#### **As a company Frazer-Nash Consultancy:**

- WILL respect the dignity and rights of its employees and place the highest priority on ensuring the safety of each other at work and the safety of others who might be affected by our activities;
- WILL seek to minimise so far as we reasonably can the impact of our activities on the environment;
- WILL comply with the law in the conduct of our business;
- WILL be honest in our dealings with those with whom we do or seek to do business;
- WILL strive to avoid even the appearance of wrongdoing or impropriety in the way we go about our business;
- WILL NOT bribe or attempt to bribe anyone;
- WILL NOT take bribes from anyone;
- WILL be diligent in selecting our business advisers and partners so that we minimise the risk of our reputation being damaged by others;
- WILL implement and observe appropriate procedures designed to ensure that we and others working for us understand what our Code of Business conduct means for them in practice; and
- WILL treat seriously breaches of our Code or its associated Guidance.

This policy should be read in conjunction with PAP1065 – Business Ethics Compliance Policy.

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### Our employees:

- WILL avoid (or properly disclose and obtain clearance for) potential conflicts between their interests and their responsibilities to Frazer-Nash or our customers;
- WILL NOT take bribes and will report to appropriate management any attempt made to bribe or improperly influence them or another employee in the execution of their duties for Frazer-Nash (in accordance with PAP2045 – Giving and Receiving Gifts or Hospitality);
- WILL NOT bribe or attempt to bribe anyone (including by making “facilitation payments”) defined as a payment to a public official or another person to encourage or reward that person for carrying out their normal duties (either at all or more quickly than they would have done without the payment) and will report to appropriate management any request or suggestion that Frazer-Nash, or anybody working for or with Frazer-Nash, should bribe or attempt to improperly influence someone (in accordance with PAP2045 – Giving and Receiving Gifts or Hospitality);
- WILL seek advice on how to proceed if they are at all unsure whether something complies with our Code of Business Conduct or how to apply its associated Guidance;
- WILL be able to raise (confidentially if they wish), without fear of unfavourable consequences for themselves, any genuine concerns they have that our Code or its associated guidance is not being followed.

### Our Business Advisors:

- MUST agree to comply, and actually comply with our Code and this Guidance, so far as relevant to them, as if they were our employees.

### Our Business Partners:

- SHOULD either be willing to subscribe to our Code and its associated Guidance or have equivalent standards and procedures in their own businesses.