

# *Code of Business Conduct*

i2a Consulting LLP

22a Leathermarket Street  
London  
SE1 3HP

[www.i2a.co.uk](http://www.i2a.co.uk)

Tel: +44 (0)20 7260 2930

*Updated: December 2009*

# OUR CONDUCT

We believe the values that form the core of our culture differentiate us as a company. We are united by a group by these values and have made explicit choices about how we want to work together as a firm based upon them - these we call our operating principles. Our values and operating principles provide the foundation for our Code of Conduct.

Our values are as follows:

- Trust: Trusting ourselves and colleagues to get things done efficiently and to the highest standards
- Discipline: Balancing freedom to operate with the discipline that is required for us to achieve our goals
- Excellence: Delivering our work that exceeds our clients' expectations
- Persistence: Understanding that lots of little things add up to create big results
- Self-belief: Having the confidence that our individual skills and experience can make positive difference
- Team Work: Working effectively together in teams to achieve exceptional results

Our Code cannot address every situation or provide guidance on every issue we will encounter. However, please take time to read the Code and seek clarification on anything about which you are unsure and apply it every day in your work with i2a and our clients.

## *The Partners of i2a*



**Alan Holroyd**



**Andy Tomkins**



**Rachel Clark**



**Heath Teasdale**

## *Our operating principles*

We approach challenges proactively believing in a positive outcome.

We accommodate personal preferences in the way we run our business whenever we can.

We choose our client engagements and assign our resources based on our capabilities and our comfort that we can deliver.

We do what we say we will do and immediately make clear if we cannot keep a commitment.

We have freedom to act, but act in a disciplined way based on our operating principles and values.

We are polite and honest, and treat our colleagues and our clients with respect.

We work inclusively, exploring all options and use our experience to best effect.

# OUR CODE



## Compliance with the Code

At i2a we are committed to working in a way which reflects our values and operating principles.

Our Code provides guidance on how we should conduct ourselves in everything we do as representatives of i2a.

All Partners and employees of i2a, and anyone acting on i2a's behalf, are expected to abide by the Code, regardless of their role or grade.

Any breaches of the Code will be treated very seriously and may result in disciplinary action.

## Raising concerns

The i2a culture promotes seeking help and guidance from our colleagues when unsure about an issue or in doubt about the correct way to act.

However, if you believe that a colleague or representative of i2a is acting in a manner that is not aligned to our Code, you should raise your concern with your Reviewer or any one of the i2a Partners. Based on the nature of the concern an appropriate response will be determined.

i2a will not tolerate any reprisals against anyone raising a compliance concern in good faith.

## Code guidance

The guidance contained in this Code is divided into four main sections:

- Our company
- Our clients
- Our people
- Our community

Each section contains details of the standards to which we expect everyone to operate in undertaking certain business activities.

At the end of the document are links to other i2a policies which underpin and support our Code. You should also familiarise yourself with each of these.

However, we recognise that the Code cannot cover every situation that may arise and good judgement and common sense should always guide our actions.

**Q.** How should I handle situations not covered by the Code?

**A.** In such situations it may be helpful to ask yourself some questions – Is the action legal? How would it appear to others? Is it in line with i2a's values? In addition, you can always seek guidance from your colleagues and i2a Partners.

# OUR COMPANY

We are all responsible for promoting the best interests of i2a in our work and must ensure that our actions and personal interests never conflict with them



## Conflicts of interest

Conflicts of interest occur where our personal interests come into conflict with those of i2a. Conflicts can arise in many ways, for example as a result of affiliations with competitors, clients or suppliers. Improper use of company assets could also be regarded as a conflict of interest.

We must avoid any real or perceived conflict of interest and we should always consider carefully situations in which our loyalty may be divided.

Any situation which gives rise to, or could potentially give rise to a conflict of interest should be disclosed to one of the i2a Partners. In the majority of cases, actual or potential conflicts can be resolved in an acceptable way for all concerned.

## Information security

i2a's IT systems and the information stored on them are critical to our company's activities. Their misuse or lack of diligence in protecting the security of them has the potential to be damaging to both i2a and our clients.

For that reason, compliance with the i2a IT Code of Conduct (as laid out in the [i2a Employee Handbook](#)) is mandatory.

i2a's digital resources, including systems, software, telephone and email services are intended to be used for conducting i2a business. Incidental or occasional personal use of such assets is permitted but business functionality should never be compromised.

## Bribery & Corruption

Bribery is completely contradictory to i2a's values, in addition to being illegal in most countries, and we will not tolerate it under any circumstances.

We view the making of facilitation payments in the same way - these payments are a form of corruption and are harmful to wider society.

We must never give or promise anything, for example, money, services, gifts, or excessive entertainment to anyone that is intended to or could be construed as intending to influence the decision of those with whom we come into contact in undertaking our business.

## Accurate records

Any data, information or records which we create or for which we are responsible should be correct and accurate. Such information can take many forms and includes recording of the time we spend on client engagements and our travel and expense claims.

We must never make a false or misleading entry into any report, record or expense claim.

**Q.** A relative of mine works in the procurement department of a potential client to whom we have recently submitted a proposal for work. Could this be seen as a conflict of interest?

**A.** Whether a conflict of interest exists will depend upon the role of your relative and their involvement in the procurement process. You should make a Partner aware of the situation and an appropriate course of action can be agreed, dependent on the circumstances.

# OUR CLIENTS

We pride ourselves on working in partnership with our clients to develop and deliver the best solutions to their challenges



## Hospitality & gifts

Corporate entertainment is a normal part of working with and developing relationships with clients and potential clients. However, it should never be engaged in for the purposes of creating improper influence, particularly related to a specific business decision. It should never be excessive or inappropriate.

Gifts, either given or received, should be of a nominal value and ideally relate to our own or our client's brands.

Before offering or accepting hospitality or gifts, the approval of a Partner should be sought. You must also maintain your own record of any hospitality or gifts, either given or received.

## Data privacy

i2a holds data relating to clients and suppliers, in addition to our current and former employees.

We must respect the confidential nature of any data we hold and ensure that it is only used for the business purposes for which it was collected.

## Confidential information

The nature of our work and the way we work in close partnership with our clients means that we often have access to sensitive or confidential data.

We must ensure that confidential information and intellectual property, both client materials and internal, documents are held securely and are not shared beyond the relevant people without obtaining the necessary permissions.

## Client policies

When we are working on client engagements, we will always comply with our client's policies and procedures, including travel, expenses, gifts and entertainment, security, IT use etc.

In the unlikely event that any of these policies are in contradiction with this Code, we will raise this issue with our clients and seek an acceptable solution.

**Q.** I have two tickets to the Wimbledon final but I can't go. I thought it would be a good idea to give them to a client I am currently working with so he can go with his wife. Is this okay?

**A.** Any entertainment we offer should be for business purposes and in the interests of furthering our relationships with our clients. As you are unable to attend yourself and if it is not appropriate for another i2a person to attend in your place, you should not make this offer.

# OUR PEOPLE

We are committed to providing a safe workplace that is free from discrimination, harassment and provides equal opportunities for all



## Health, safety & security

i2a is committed to ensuring we all have a safe and secure environment to work in.

We are all responsible for complying with the [i2a Health & Safety Policy](#) at all times and if we see anybody working in an unsafe manner, we must draw this to the attention of the individual.

## Harassment & bullying

All of us are entitled to work in an environment free from harassment or bullying, and we are fully committed to our operating principle of being “polite, honest, and treating our colleagues and clients with respect”.

i2a will not tolerate harassment or bullying in any form.

## Equal opportunity

We believe every person at i2a should be given the opportunity to develop their skills through experience, regardless of gender, race, religion, sexual orientation or disability.

To that end, the [i2a Equal Opportunity Policy](#) highlights how we implement this and what it means for you.

## Inclusion

We know that a substantial part of our strength comes from combining our collective skills and experience to explore all options before determining the best solution.

We therefore seek projects where we deliver as an i2a team, where we can challenge and support each other, and will always endeavour to understand and consider our personal preferences when working together.

**Q.** At a recent i2a event a prospective client made some very inappropriate comments to one of my colleagues. She was clearly uncomfortable but aware that this could be a potentially lucrative project so did not say anything further about it. Should I speak up?

**A.** It is important to us that no one feels harassed or bullied in any way. You should encourage your colleague to talk to her Reviewer or one of the Partners about her experience, so that the appropriate action to take can be determined.

# OUR COMMUNITY

We respect and support efforts towards enhancing and protecting the local communities and environment where we work to enable sustainable long term success



## Charitable activity

At i2a we strongly believe in using our expertise to benefit our local community, and we have links to certain charitable organisations which aim to benefit the society in which we operate.

We also encourage and support our people who wish to carry out charitable work and do our best to enable people to participate in these activities alongside their employment at i2a.

Our people are obviously also welcome to donate financially to any charities they wish, but in doing so, it should be clear that the donation is a personal one and that i2a is not associated with personal charitable donations.

## Environment

We recognise that nearly every activity carried out by i2a and its employees will have some impact on the environment.

As a company, we strive to minimise this impact through:

- Using virtual meeting technology and teleconferencing where appropriate
- Minimising usage of office consumables
- Recycling as much as possible
- Encouraging people to use public transport and providing facilities for our employees who wish to cycle.

The [i2a Environmental Policy](#) provides more information and guidance in this area.

## Political activity

We understand that individuals may choose to have affiliation with political parties through participation or contributions.

Those who choose to be involved with any political organisation, must do so in a private capacity and must ensure that it could not be open to the misinterpretation that the activity is undertaken on i2a's behalf.

## Media engagement

Our brand and reputation are critical to the success of our business. When we engage with the media, we must ensure that the information we provide is accurate and consistent.

If you are asked to speak or comment in a professional capacity on i2a's behalf, you should speak to one of the Partners before making any commitment to do so.

**Q.** I've been invited to speak at a meeting of a charity with which I'm involved. They have asked if I can provide some insights on the way large corporates work with charities based on the clients I have worked with. Is this okay?

**A.** Before accepting you should discuss the matter with an i2a Partner. If you do go ahead you must ensure that you do not reveal information which is not publicly available or comment in any way which could be viewed as in conflict with i2a's interests.

# OUR POLICIES

All the policies referred to in this Code can be found on our SharePoint site, or by clicking the links below:

[Employee Handbook](#)

[Equal Opportunity Policy](#)

[Health & Safety Policy](#)

[Quality Policy](#)

[Security & Confidentiality Policy](#)

[Recruitment Policy](#)

[Environmental Policy](#)

[Disaster Recovery Policy](#)

Note: the above policies are only available to i2a Partners and employees.