

Code of conduct

The reputation of the firm is in your hands





Unite through global collaboration



Demonstrate leadership in all we do



Promote a consistent culture of excellence



Act with agility



Ensure deep respect for people



Take responsibility for our actions

The reputation of the firm is in your hands

When asked what distinguishes Grant Thornton as a firm, my response is always “our people”. I believe our shared values and unified approach make us exceptional.

We have published our values and refer to them often. In order to maintain a clear understanding across the whole firm of how to live those values in given situations, we have published this code of conduct. Within these pages you will find the standards we seek - and some corresponding challenges to ask of yourself to see where you stand and to test your thinking.

We all face difficult decisions in our everyday working life and no code of conduct can govern every situation. However, such decisions will become easier to resolve if each of us takes responsibility to understand the code and the values on which it is based.

While this is an internal document - intended to educate and align ourselves - its content need not be hidden. If we do this right, others will see the intent behind these words. This is a code that we will all live, every day.

Importantly, the final pages give you guidance on where to get support when you have a concern or if you need advice. I hope that you always feel that you can approach a colleague or partner with any issue. But if ever this is not the case, we have subscribed to a confidential whistleblowing hotline which you can use in absolute confidence.

Our reputation is in the hands of every individual in the firm. Protect it.



Scott Barnes
CEO





ASK YOURSELF

- do I treat others as I'd like to be treated?
- am I aware of the impact of my attitude and behaviours on others?
- do I give open and honest feedback to others?
- do I regularly consult, seek and accept feedback?
- do I constantly look for new and better ways of working?
- do I embrace the benefits of working in teams?
- do I ever support and encourage poor behaviours by not challenging them?

It's in your hands, protect it.



Working together:

We treat everybody with respect and dignity, building relationships based on confidence and trust. We nurture and value each other's contribution to the firm's success.

Specifically:

- we celebrate our diversity and recognise the strength that a wide range of experiences, skills and perspectives brings
- we are committed to maintaining a working environment that is free from prejudice and harassment and will not tolerate behaviours that compromise this
- we recognise our individual responsibility for understanding the impact of our actions and behaviours on the wellbeing and safety of others
- we give, and expect to receive, regular, open and honest feedback
- we do not have a blame culture: we learn from our mistakes, resolve differences promptly and professionally, and seek practical ways to move forward
- we foster a consultative and collaborative environment, working together to develop the best quality solutions
- we support and encourage each other's development and recognise our individual responsibility for continuous learning
- we encourage people to strive for a work/life balance that helps them meet both their personal goals and career aspirations
- we respect each other's privacy and strive to ensure all personal information is safeguarded.



ASK YOURSELF

- do I fully understand my client's business?
- are my technical knowledge and skills sufficiently up to date to provide this client with the best solution?
- have we kept the client fully informed on all aspects of the assignment?
- do I do what I say I'll do, when I say I'll do it?
- do I always consider which other specialists could be used for each client assignment?
- have we the right skills and expertise to service this client?
- do I always look for new and innovative ways to exceed my clients' expectations?

It's in your hands, protect it.



Working with clients and others:

Our success is driven from our total commitment to excellence, delivering the highest quality of service and care to our clients. We thrive on working together, drawing on each other's skills, knowledge and expertise, seeking innovative and exciting solutions to meet our clients' needs.

Specifically:

- we each take personal responsibility for the quality of work we do and the service we provide
- we listen to our clients and show genuine care and attention to their needs
- we ensure that our clients understand and agree the scope and terms of our services before we start work
- we only offer services for which we have the necessary skills, expertise and experience and all new services are reviewed and approved prior to being offered to clients
- we are honest, objective and courageous in our dealings with clients and we are not afraid to give difficult or unwelcome information
- we treat our clients fairly and provide them with clear information and advice suited to their needs
- we ensure that every engagement is properly supervised and managed and carried out in accordance with all applicable standards
- we lead in our chosen markets by providing innovative, quality solutions that add value for our clients
- we record time and expenses truthfully and bill our clients with appropriate fees in line with our contractual obligations
- we will not work with clients or employ people whose standards are incompatible with our code of conduct.



ASK YOURSELF

- am I confident that decisions I take do not reflect negatively on the firm?
- do I take personal responsibility for identifying undesirable clients when following the firm's take-on procedures?
- does all my written work comply with the firm's brand guidelines?
- do I take special care to protect my laptop when I'm out of the office or travelling?
- do I keep my desk clear whenever I'm away from it?
- do I lead by example in maintaining confidentiality?
- am I aware of the risk of my email being circulated beyond the intended recipient?
- do I know what to do in an emergency?

It's in your hands, protect it.



Protecting our business:

We each have responsibility to protect the firm's reputation, safeguard our valued human capital and keep safe the physical and electronic assets which we use every day.

Specifically:

- we recognise no one client is more important than our need to maintain public trust or protect our good reputation
- we avoid any actions that will discredit the firm or our profession
- we will not obtain, use or disclose confidential or personal information belonging to clients, the firm or our people for our own personal advantage or for the benefit of third parties
- we do not give informal opinions or references without having first completed the work required to support them
- we protect all intellectual property (including copyright) and respect the restrictions on its use and reproduction
- we do not solicit, accept, propose, or pay bribes
- all computer hardware, software and associated data are secure and protected from unauthorised access, theft and data corruption
- we limit our personal use of the firm's systems and specifically take care to protect the firm's reputation from careless or inappropriate comments or views
- we report any knowledge or suspicion of financial crime to the firm's Money Laundering Reporting Officer
- each location has an up to date business continuity plan so that our people are protected and business activities are not interrupted in the wake of an unplanned event.



ASK YOURSELF

- am I objective when selecting suppliers, avoiding personal interest or bias?
- do I look for opportunities to reduce business travel, save resources and recycle office consumables?
- do I support my team's involvement in fundraising activities?
- could I use volunteering as a means of self development or developing my team?
- do I lead by example and take personal responsibility for my own health and wellbeing?

It's in your hands, protect it.



Impacting society:

Our biggest impact on society comes from the services we offer and our contribution to the stability of financial markets. We recognise our activities impact beyond the firm and we aim to be a responsible corporate citizen.

Specifically:

- we take leadership positions on issues of importance to the business community
- we share our skills, working with others to build stronger, sustainable communities on a local, national and international level
- we encourage our people to volunteer their time and experience with the aim of making a difference to the lives of others
- we only contract with suppliers who share our commitment to ethical behaviours and we build supplier relationships based on fairness and trust
- we constantly look for ways to minimise the detrimental environmental impact of our business operations
- we support numerous charities using fundraising events which also provide opportunities for enjoyment, teamwork and skills development
- we promote wellbeing activities to demonstrate the benefits of sustaining a healthy lifestyle
- we recognise our responsibility to pass on a stronger and more valuable organisation and profession to the next generation.



ASK YOURSELF

- am I acting legally and in accordance with our professional standards?
- would I speak up if I felt I was being asked to do something that I think might be wrong?
- do I know what to do if I think others are involved in potentially unlawful or unethical conduct?
- have I reported any circumstances or relationships that may compromise my or the firm's independence and integrity?
- when faced with challenging decisions do I always consult fully?
- do I ensure that my personal and business activities and interests are kept separate?
- would I be embarrassed if others knew that I took a particular course of action?
- would an independent third party think that the value of this gift challenged my integrity and objectivity?
- do I do the right thing even when no one's watching?

It's in your hands, protect it.



Behaving with integrity:

Our reputation is built not only on the quality of our services but also on the individual and collective behaviours of our people. We expect our people to be honest, trustworthy and straightforward, doing not simply what is lawful but also what is right.

Specifically:

- we comply with all applicable technical and professional standards and regulatory requirements
- we comply with the spirit as well as the letter of ethical standards
- we promote a culture where consultation on ethical and technical issues is actively encouraged and seen as a strength not a weakness
- we provide an ethics helpline to enable our people to obtain advice about sensitive ethical issues on a confidential basis
- we work with our regulators to improve the regulatory environment and promote efficient, orderly and fair financial markets
- we do not allow bias or the undue influence of others to affect our professional judgement
- we avoid any conflicts of interests or relationships that could impact on our ability to act objectively or independently
- we continually monitor adherence to the firm's global independence policy, including restrictions relating to immediate family members
- we do not offer or accept gifts or hospitality that could, or could be seen to, affect our independence or objectivity
- we do not malign our competition or collect information about them in an unfair or unlawful way.

Stay informed



Take ownership



Search for answers



Be heard



**Prepare to be
challenged**



Live the values

It's in your hands, protect it.



Getting support:

This code of conduct sets out the guiding principles for the standards of behaviour we expect from each other. Each of us has a personal responsibility to understand and live up to these principles and in doing so to bring our values to life.

However, the code is not intended to be a substitute for our individual responsibility to exercise good judgment, to consult with others when faced with difficult decisions or to report serious professional breaches which compromise the firm's reputation.

If you need advice on ethical or compliance matters or if you want to raise concerns, there are many people to help and support you including:

- your line manager
- your engagement partner
- your managing partner
- your HR representative.

You could also use the ethics helpline to obtain advice in confidence. Queries should be raised using ethics@gtuk.com and a member of the ethics team will contact you immediately.

If for any reason you do not wish to discuss a matter of concern with your line manager, HR representative or managing partner, you can use the confidential whistleblowing hotline on **0800 954 0043**

This service enables you to speak up in absolute confidence if you become aware of, or are concerned about, fraud, theft or other misconduct including injustice, harassment, bullying or other inappropriate behaviours.

Remember, it is better to ask than risk the consequences of a wrong decision.



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