

## THE CODE OF CONDUCT

Throughout this Code of Conduct the expression Camargue shall mean Camargue Communications Limited and its associated companies, its and their respective employees, consultants and any third parties engaged by any of them on behalf of their clients.

1. Camargue must act with honesty towards clients and the institutions of government.
2. Camargue must use reasonable endeavours to satisfy itself of the truth and accuracy of all statements made or information provided to clients or by or on behalf of clients to the institutions of government.
3. In making representations to the institutions of government, Camargue must be open in disclosing the identity of its clients and must not misrepresent their interests.
4. Camargue must advise clients where the activities of those clients may deliberately and intentionally interact with the institutions of government and as a result be illegal, unethical or contrary to professional practice, and shall be entitled to refuse to act for a client in pursuance of any such activity.
5. Camargue must not make misleading, exaggerated, or extravagant claims to clients about, or otherwise misrepresent or misstate, the nature or extent of their access to the institutions of government or to political parties or to persons in those institutions.
6. Camargue must not offer or give, or cause a client to offer or give whether directly or indirectly, any financial or other incentive to any member or representative of an institution of government, whether elected, appointed or co-opted, that could be construed in any way as a bribe or solicitation of favour. Camargue must not accept any financial or other incentive, from whatever source, that could be construed in any way as a bribe or solicitation of favour whether directly or indirectly.
7. Camargue must not:
  - (i) Employ whether directly or indirectly any MP, MEP, Member of the House of Lords or any member of the Scottish Parliament or the National Assembly of Wales or the Northern Ireland Assembly;
  - (ii) Make any award or payment in money or in kind (including equity in a member firm) whether directly or indirectly to any MP, MEP, Peer or to any member of the Scottish Parliament or the National Assembly of Wales or the Northern Ireland Assembly, or to connected persons or persons acting on their account.
8. Camargue will comply with any statute, any resolution of an institution of government and with the adopted recommendations of the Committee on Standards in Public Life in relation to payments to a political party in any part of the United Kingdom.
9. Any Camargue employee or consultant who might also serve as a member of decision making public bodies (including local authority councillors) is prohibited from working on a client assignment of which the objective is to influence a decision of the body on which he or she shall serve.
10. Camargue must keep strictly separate from its duties and activities as political practitioners any personal activity or involvement on behalf of a political party, including as an office holder or candidate for office.
11. Camargue will conduct itself in accordance with the rules of any institution of government while within its precincts, and otherwise.
12. Camargue will always abide by the internal rules on declaration and handling of interests laid down by any public body on which it shall serve.
13. Camargue must not exploit public servants or abuse the facilities of institutions of central, regional or local government within the UK.
14. Conduct within the code is overseen by an Independent Adjudicator who is a member of the Bar Council or Law Society.
15. The champion of this Code of Conduct with Camargue is Jenny Marshall (Director). All staff are made aware of the Code when they join the company – it is an integral part of the staff handbook that all new members of staff read and acknowledge they have read. If this Code is amended in any way it is recirculated for all staff and their acknowledgement of receipt is recorded.
16. This Code is regularly reviewed to ensure it remains relevant.
17. This Code is clearly located on Camargue's corporate website and available for view by the general public.

## Complaints procedure

Should someone wish to make a complaint about a perceived breach of the Camargue Code of Conduct, they will need to make it, in the first instance, to Camargue's Managing Director, Ben Copithorne ([bcopithorne@camargue.uk](mailto:bcopithorne@camargue.uk)).

Any complaint relating to a failure to report an activity of consultant lobbying to the Registrar will be a matter for Registrar for Consultant Lobbying to investigate. Should the complainant wish to pursue the complaint beyond the Managing Director, the matter will be referred by the Managing Director to an independent adjudicator as appointed by Camargue's solicitors or, at the option of the complainant, appointed by the President for the time being of the Law Society.

The independent adjudicator will assess, with the complainant, whether the complaint can be resolved without a formal process or whether a formal process is required.

If civil or criminal action has been initiated on the issue, the independent adjudicator will wait until the outcome of the legal action is known.

The complainant must agree to meet the costs of the independent adjudicator and the costs of selecting the independent adjudicator, if the latter finds against the complainant.

The complainant must agree to respect the confidential nature of the procedure; bear its own costs of bringing the complaint; and abide by any orders as to costs made by the independent adjudicator.

The complainant must agree that the decision of the independent adjudicator is final and binding and that there is no right to appeal or any other rights of remedies against Camargue.

## The complaints process

If a complaint is raised, Camargue will have ten working days to respond in writing to the independent adjudicator. The response will also be given to the complainant.

The complaints process will ordinarily be conducted by written representations. However, if the independent adjudicator sees merit in holding a hearing in person or by other electronic means they will ask Camargue, in consultation with the complainant to fix a time / place for the hearing. The independent adjudicator will provide a process for that hearing.

The independent adjudicator will determine if there is no case to answer or, subject to that determination, whether the complaint is to be accepted or dismissed.

If a complaint is accepted the staff member or consultant in question will be subject to Camargue's disciplinary process based upon the facts proven during investigation of the complaint.

In the event that a complaint results in a finding that the Camargue Code of Conduct has been breached Camargue will publish that fact upon its website as soon as reasonably practicable thereafter.

Approved on behalf of Camargue Group Limited,

A handwritten signature in black ink, appearing to read "Ben Copithorne".

Ben Copithorne  
Managing Director  
01 March 2023