

Growth Incorporated Code of Conduct for Consultant Lobbying

1. Purpose and Scope

This Code of Conduct sets out the standards of behaviour expected of all employees, associates, and contractors engaged in consultant lobbying activities on behalf of clients. It applies to all communications with UK Government Ministers, Permanent Secretaries, and equivalent officials, as defined under the Transparency of Lobbying, Non-Party Campaigning and Trade Union Administration Act 2014.

2. Integrity and Transparency

- All lobbying activities must be conducted with honesty, integrity, and transparency.
 - Communications must clearly identify the client being represented and the nature of the lobbying activity.
 - Any relevant communication must be declared in the Quarterly Information Return (QIR).
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3. Compliance with Legal Obligations

- All employees must comply with the requirements of the 2014 Act and the guidance issued by the Registrar.
 - No relevant consultant lobbying may be undertaken unless the company is registered and the activity is properly declared.
 - Employees must not engage in lobbying that could be construed as unregistered or misleading.
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4. Respect for Public Officials

- Communications with Ministers, Permanent Secretaries, or equivalent officials must be respectful and professional.

- Employees must not offer or imply any inducement, reward, or preferential treatment in exchange for access or influence.
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5. Conflicts of Interest

- Employees must declare any personal or financial interests that may conflict with their lobbying activities.
 - The company must maintain a register of interests and ensure that conflicts are managed appropriately.
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7. Record-Keeping and Reporting

- Accurate records of all lobbying communications must be maintained, including dates, officials contacted, and topics discussed.
 - These records must be available for inspection by the Registrar if requested.
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8. Training and Awareness

- All employees involved in lobbying must receive training on the legal framework and ethical standards.
 - Regular updates and refresher sessions will be provided to ensure ongoing compliance.
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9. Complaints Procedure

- Clients who believe a breach of this Code has occurred may submit a complaint by emailing hello@growth-inc.com
- Complaints will be acknowledged promptly and reviewed
- Where appropriate, complaints may be referred to an independent arbitrator who will review the matter and issue a binding decision. The arbitrator will be appointed based on independence, impartiality and relevant experience.

10. Sanctions and Consequences

- If a breach of this code is confirmed:
 - Where an individual has breached the code through their own working practices, the company will follow disciplinary procedures in line with HR policies, including our whistleblowing policy where applicable, which could result in suspension or dismissal.
 - At organisational level, the company will undertake a review of practice to understand how the breach occurred and put measures in place to reduce the risk of it happening again.