



Fullbrook Strategies Limited Code of Conduct

Overview

Since 2022, Fullbrook Strategies Limited ('FSL') has been registered with the Register of Consultant Lobbyists ('RCL'), an independent statutory office holder appointed under the Transparency of Lobbying, Non-party Campaigning and Trade Union Administration Act 2014. Any consultant lobbyist is legally obliged to:

1. Register with the RCL before conducting any consultant lobbying activity; and
2. Submit the name of Clients they have lobbied for or been paid to lobby for each quarter to the RCL.

At FSL, we always behave in a legal, appropriate and ethical manner. The work that we undertake is always conducted in compliance with the regulations and laws of England and Wales, as well as with the regulations or the laws of any jurisdiction in which we carry out work or in which our Client resides, is incorporated or is headquartered.

FSL's lobbying policy outlines the conduct expected of its staff and consultant lobbyists when engaging in any activities related to lobbying in the UK. The policy applies to all FSL employees, including any individuals or companies that are engaged in temporarily working for FSL. All employees must have read and understood this policy prior to engaging in any lobbying or lobbying-related work.

This policy applies to FSL employees, regardless of location and setting. Any suspected breaches of this policy or the statutory requirements will lead to an internal investigation. Should the individual in question be found to have committed a breach, the individual will be subject to the disciplinary process and procedure as laid out in their employment contract and the employee handbook. This may include termination of employment. Failure to comply with statutory requirements is a criminal offence and could result in a fine.

FSL always conducts thorough due diligence and KYC checks prior to engaging with any prospective Client to ensure that there are no conflicts or legal/ethical concerns regarding engagement with the Client. For example, FSL does not undertake work from Clients subject to international or relevant government sanctions.

FSL and all FSL employee may only undertake any lobbying activities on behalf of a client where there has been express instructions, consent and authorisation to do so from the Client. FSL employees must not undertake any lobbying on behalf of a Client where there is a conflict of interests with another Client or FSL. Any concerns regarding this should be raised with your line manager.

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Fullbrook Strategies Ltd, 21-24 Millbank Tower, London, SW1P 4QP
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Registered company number: 13982078 | VAT registration number: 407375692

UK Legal Requirements

Lobbying is an activity intended to inform and influence government policy and legislation. When carried out responsibly, lobbying is a legitimate and beneficial activity, providing policy makers with information, expertise and resources and addressing the public by stimulating and contributing to public debate. Companies are at the forefront of change and are experts in their field. They can be affected substantially by changes in laws and regulations and seek to operate in economies and societies where business can flourish. However, lobbying must be carried out with integrity and in compliance with the law and internal FSL policy.

The Office of the Registrar of Consultant Lobbyists was set up by the Transparency of Lobbying, Non-Party Campaigning and Trade Union Administration Act 2014 to ensure transparency in the work of consultant lobbyists and their engagement with Ministers and Permanent Secretaries on behalf of clients. Through this act, the UK government legislated to make it a criminal offence to carry out the business of consultant lobbying without disclosure via the Statutory Register of Consultant Lobbyists. The RCL is publicly available and can be searched [here](#).

The RCL applies only to consultant lobbying, where:

- Lobbying is undertaken for third party client(s);
- The consultant lobbyist communicates (orally, in written form, or electronically) personally with a government minister, permanent secretary or equivalent current in post;
- The consultant lobbyist is VAT registered; and
- The consultant lobbyist undertakes this communication on behalf of a client for payment.

FSL Expectations

FSL employees are expected to always conduct work in a legal, regulatorily compliant manner with honesty and integrity. Everything FSL employees do should be able to be justified publicly and in accordance with internal policy.

In addition to the guidance laid out above, FSL employees or any individual undertaking work on any basis for FSL are required to be familiar with this policy, the [guidelines](#) from the RCL, attend training relating to this and sign a form confirming that they have understood the policy and guidelines. It is essential for all employees to follow instructions from line managers on what to record to ensure we operate compliantly and legally. Failure to do so will result in disciplinary action and may result in dismissal.

FSL employees are strictly prohibited from using serving elected members of government, either directly or indirectly through a third party, as a paid consultant to conduct lobbying

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work on FSL's behalf. This would include any member of the House of Lords, MPs, as well as members of the Welsh, Northern Irish, Scottish, or London Assemblies.

FSL employees must, at all times, act with integrity and honesty. This includes being transparent with Clients regarding FSL's lobbying network and capabilities, not misrepresenting the Client's interests and accurately recording all relevant interactions. The employee is expected to record **all** interactions with government ministers, permanent secretary or equivalent in post internally for compliance purposes.

- The location and context of the lobbying is irrelevant, all interactions both inside and outside of work must be adequately recorded and reported to FSL's COO.
- Interactions include all oral, written and electronic conversations intended to influence a government function.
- The interactions must be made directly to government ministers, permanent secretary or equivalent in order to qualify.
- Government functions would include state-contracts, state-grants, state-licences, any state policy/legislation/proposal/regulation and financial assistance.
- Additionally, should multiple Clients benefit from one communication, each Client must be declared on the RCL.
- These requirements apply only to the UK and not the EU.
- Unacceptable behaviours would include undue methods such as bribes.
- If in doubt regarding any aspects of the policy, consult your line manager.

Of note, FSL employees are **not** required to divulge the identity of any Clients for whom they do not lobby. In relation to Clients for whom they do lobby, they must respect the confidentiality of their engagement with their listed Client at all times. This means that they are not required to submit any details of communications between them and the listed Client to the Registrar, only the Client's name is registered.

Penalties

- We will publish any breach on our website.
- Any sanction will be decided by our clients.
- Any breach would be judged on a case-by-case basis and the offender would be appropriately sanctioned up to ending of their employment in a serious case.

What To Do If You Are Concerned

If you are unhappy with the conduct or work of FSL or an FSL employee, you can raise a complaint against them by contacting FSL's Founder and Chief Executive, Mr Mark Fullbrook.

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