

How we conduct business

Frazer-Nash Consultancy will conduct its business to the highest standards of honesty and integrity. We are all acutely aware that our reputation and good name are our greatest assets; they are easily tarnished by actual or suspected corrupt or unethical behaviour. This would impact our standing in the marketplace and ultimately the performance of the company.

It is worthy of note that corrupt behaviour can be criminal behaviour: the company and employees can be prosecuted, fined or imprisoned. Whilst the personal consequences are obviously serious, there are broader consequences for the company. It could also lead to existing contracts being terminated and disqualification from bidding for others, impacting Frazer-Nash and our sister companies.

What our code of conduct means

As a company we will:

- Respect the dignity and rights of our employees and place the highest priority on ensuring the safety of each other at work and the safety of others who might be affected by our activities
- Seek to minimise so far as we reasonably can the impact of our activities on the environment
- Comply with the law in the conduct of our business
- Be honest in our dealings with those with whom we do or seek to do business
- Strive to avoid even the appearance of wrongdoing or impropriety in the way we go about our business
- Be diligent in selecting our business advisers and partners so that we minimise the risk of our reputation being damaged by others
- Implement and observe appropriate procedures designed to ensure that we and others working for us understand what our Code of Business Conduct means for them in practice
- Treat seriously breaches of our Code or its associated guidance

As a company we will not:

- Bribe or attempt to bribe anyone
- Take bribes from anyone

Our employees will:

- Avoid (or properly disclose and obtain clearance for) potential conflicts between their interests and their responsibilities to Frazer-Nash or our customers
- Seek advice on how to proceed if they are at all unsure whether something complies with our Code of Business Conduct or how to apply its associated guidance
- Be able to raise (confidentially if they wish), without fear of unfavourable consequences for themselves, any genuine concerns they have that our Code or its associated guidance is not being followed

Our employees will not:

- Take bribes and will report to appropriate management any attempt made to bribe or improperly influence them or another employee in the execution of their duties for Frazer-Nash
- Bribe or attempt to bribe anyone (including by making *facilitation payments) and will report to appropriate management any request or suggestion that Frazer-Nash, or anybody working for or with Frazer-Nash, should bribe or attempt to improperly influence someone

Our business advisors

- Must agree to comply, and actually comply, with our Code and this guidance, so far as relevant to them, as if they were our employees.

Our business partners

- Should either be willing to subscribe to our Code and its associated guidance or have equivalent standards and procedures in their own businesses.

A *facilitation payment is a payment to a public official or another person to encourage or reward that person for carrying out their normal duties (either at all or more quickly than they would have done without the payment).