

# Chime Group Holdings Limited

## Additional Statements to the 2015 Financial Accounts

### Ethics and Integrity

# Ethics and Integrity

Chime companies promote and manage brands, individuals, commercial and governing organisations and events. We therefore recognise that the integrity of our own staff is essential to the maintenance of our own reputation in the marketplace.

As such we have a published set of core values ('S.C.O.R.E. '), a Staff Code of Conduct and a Responsible Business Code: these underpin all of our activities.

## Our Core Values

Chime is a group of companies with a diverse range of cultures. However all of our businesses share the same common core values through S.C.O.R.E. Our values are expressed and find meaning through the way we acknowledge our responsibilities to our stakeholders and in the way we behave.



# Ethics and Integrity Cont.

Our Staff Code of Conduct formalises the values and further sets out the behaviour and ethical standards expected of Chime employees.

## **Staff Code of Conduct**

Our staff are responsible for adhering to the Code in addition to measures applied by their respective operating company. Our Code covers:-

- client and company confidentiality;
- equal opportunities and the promotion of a meritocracy;
- a safe and civilised workplace;
- proper consideration of the sensitivities of potential audiences when publishing materials;
- honest business practice and integrity;
- and compliance with all laws and regulations.

The Code remains under review in order that it may be adapted as market forces and legal requirements demand or as additional risks are identified. Whilst it is broad, it is designed along with our guiding values to be embedded within our diverse range of operating cultures. Our risk management processes include testing of these areas and ensures that the Code is communicated and its guidance is adopted by all.

Our divisional management teams, in promoting the Code within their own operational culture, will adapt, add to, but not dilute the Code in order to ensure that it remains fit for purpose and relevant within the applicable business.

# Ethics and Integrity Cont.

## **Operating standards**

Chime coordinates the operations of our Group businesses and in doing so sets the expectations of the standards which must be met and maintained by each of our businesses.

Each business has adopted processes and procedures which deliver to the Group standards but within their own distinct culture.

We also communicate our standards of trading to staff and our external stakeholders via our Responsible Business Code which summarises our approach to doing business. This is supported by detailed specific policies and procedures on various aspects of our activities. The Responsible Business Code can be found on our website [www.chimegroup.com](http://www.chimegroup.com) .

## **Conflicts of interest**

The Group has a process for identifying potential conflicts of interests which may exist for executives, staff, clients and suppliers. We believe that this is an important part of our ethical stance and acting in a transparent manner

# Ethics and Integrity Cont.

## **Anti-corruption**

The Board acknowledges its responsibility for maintaining appropriate and clear procedures within Chime's operations to prevent corruption. We shall continue to use the UK Bribery Act 2010 and the US Foreign Corrupt Practices Act as a minimum benchmark for compliance with those laws, and on behalf of, our clients and partners.

Where additional measures are required, by virtue of working in new markets, for clients who have specific requirements or, due to our operations engaging in new disciplines, the Group will adapt the chosen procedures to meet those needs as they arise.

The divisional and subsidiary management teams will continue to promote our standards and make staff aware of the consequences of non-compliance.

Our Staff Code of Conduct covers honest business practice and prohibits the offering, payment or solicitation of bribes or inducements.

Whilst we are a UK business our operations are international and our aim is to derive more of our income from outside of the UK. Our standards of anti-corruption measures apply to all of our businesses irrespective of where they are based or operate.

# Ethics and Integrity Cont.

## **Whistleblowing**

The Group has a clear, written whistleblowing policy and procedure available to all staff regarding concerns of employees about ethical behaviour and noncompliance with our own standards, regulatory requirements and/or the law.

The Group has a confidential helpline, run by an external third party, EXPOLINK, in order that staff can report any concerns or perceived shortcomings within our operations to an unbiased third party. The helpline is promoted on each operating process and policy and via a number of Group communications.