

APPLEBY ASSOCIATES



APPLEBY ASSOCIATES
CODE OF CONDUCT



Within Appleby Associates, our core asset is our people; so for us all to perform at our best, to provide the service our clients expect and require of us, we promote an environment and culture which supports, challenges and develops our people. This Code of Conduct is intended for use:

- By our senior management team to maintain the foundation of Appleby Associates through responsible and ethical decision-making and upholding Appleby Associates Values;
- By new and prospective employees as a guide to the firm they are considering joining;
- By our clients, suppliers and external consultants, as they seek to understand the nature of the organisation with which they are dealing;
- By all our people, to recognise what is expected of them and the responsibilities resting on each of them to make sure we all adhere to the Appleby Associates Values, for the benefit of each other and our clients.

We conduct our business within the framework of applicable professional standards, laws and regulations together with Appleby Associates policies and standards. However, we also acknowledge that these standards, laws, regulations and policies do not govern all types of behaviour. As a result, we also have a Code of Conduct for all Appleby Associates people based on our values.

While the Code provides a broad range of guidance about the standards of integrity and business conduct, no code can address every situation that individuals are likely to encounter. As a result, this is not a substitute for our responsibility and accountability to exercise good judgment and obtain guidance on proper business conduct. The strength in our organisation is the strength in our collective knowledge and the sharing of that knowledge and experience.

When we help clients prepare for interview we say, "Don't simply lay claim to skills, expertise and competencies but prove them with specific examples. Always provide evidence to back up your claims." In short, "If you claim it prove it; if you can't prove it don't claim it." As a business we take the same approach. Our service philosophy is built upon our three core values: Integrity, Transparency and Respect.

Integrity - The person you meet is the same one you work with. If you're looking for an 'individual support' programme you will meet with your consultant, if it's an organisational need, you will meet with the lead consultant who will be responsible for the delivery of the programmes. You will not be passed around. We don't have sales teams and we don't outsource. Continuity of contact ensures that your consultant has a real interest and will be able to tailor the work to directly address your specific needs, situation and timescales.

Transparency - The first time you meet your consultant they will explain in detail how they will work with you and you will be able to see some of the materials that will be used. Appleby Associates is founded on providing a service of excellence and as such we have many clients we have worked with that are happy to provide testimonials. Should you wish to speak to one, your consultant will be happy to arrange it.

Respect - We employ consultants who will be honest with you from day one. Ask a question and be as direct as you wish, your consultant will give you a straight answer. We offer a range of services; we believe career needs are too complex and diverse to be met by a 'one size fits all' approach.

OUR CONSULTANTS' CODE:

- Continuously improve our professional skills, competency and knowledge to provide the highest quality of service to organisations and individual clients.
- Comply with all laws, statutes and regulations affecting business practices and service relationships.
- Fully disclose any potential conflict of interest.
- Report any illegal acts by their employers, peers or business partners to appropriate authorities.
- Clearly define the services we offer and ensure these services are within their knowledge and abilities.
- In marketing services, describe factually and neither claim, misrepresent nor imply professional qualifications exceeding those possessed, nor knowingly cannot be delivered.
- Administer and/or interpret only those assessment instruments for which they have appropriate qualifications.
- Release assessment results to third parties, where applicable, only after obtaining written permission from the individual client.
- Maintain confidentiality by disclosing to each individual client that general progress updates may be provided to a sponsoring organisation (at their request); however, such reports would be generic in nature, and no personal or confidential information will be provided.
- Take reasonable action to inform potentially vulnerable third parties and/or responsible authorities when conditions indicate that there is a clear and imminent danger to the client, sponsor or others. Ideally, this will be done with the individual client's knowledge or permission, but if necessary, without.



- Offer no payment to employees of sponsoring organisations for referrals, nor accept inappropriate gifts.
- Refrain from supporting, participating in, and/or benefiting from the violation of these Standards.
- Keep client information and records of client engagements confidential and use proprietary client information only with the client's permission.
- We will not take advantage of confidential client information for ourselves or our firm.
- We will not allow conflicts of interest which provide a competitive advantage to one client through our use of confidential information from another client who is a direct competitor without that competitor's permission.
- We will accept only engagements for which we are qualified by our experience and competence.
- We will assign people to client engagements in accord with their experience, knowledge and expertise.
- We will immediately acknowledge any influences on our objectivity to our clients and will offer to withdraw from a consulting engagement when our objectivity or integrity may be impaired.
- We will agree independently and in advance on the basis for our fees and expenses and will charge fees and expenses that are reasonable, legitimate, and commensurate with the services we deliver and the responsibility we accept.
- We will disclose to our clients in advance any fees or commissions that we will receive for equipment, supplies or services we recommend to our clients.
- We will respect the intellectual property rights of our clients, other consulting firms and sole practitioners and will not use proprietary information or methodologies without permission.
- We will not advertise our services in a deceptive manner and will not misrepresent the consulting profession, consulting firms or sole practitioners.



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