

**Thames Estuary Growth Board  
(‘The Company’)  
Code of Conduct  
for the Executive Team and Board Members**

The Board of Directors (‘the Board’) have considered and approved this policy. The policy will be reviewed by the Head of Operations annually and updated as necessary. Any major changes will be shared with the Board for approval before the document is issued.

The policies and procedures set out in this policy do not form part of an employee’s contractual terms of employment with the Company and are not contractually binding on the employee or the Company.

**Introduction**

The Thames Estuary Growth Board (‘the Company’) strives to conduct all its activities to the highest ethical standards and in compliance with its legal obligations.

The Company can only realise this ambition through our people, and it is therefore essential that all representatives of the organisation conduct themselves according to the highest standards of behaviour, in the most professional manner and with a commitment to perform their work to the best of their ability.

**Purpose**

This Code of Conduct (‘the Code’) sets out the behaviour and standards that are expected of all Executive Team and Board Members and identifies policies that are relevant to the conduct of business.

All Executive Team and Board Members will sign up to a code of conduct on commencing their role with the Company or at the point of introduction of the code.

**Scope**

The Code applies to all Executive Team and Board Members. Each individual is responsible for adhering to this policy and must consult as necessary with the Head of Operations. Failure to follow the Code may damage the Company’s reputation and its work and may consequently be viewed as a disciplinary matter to be dealt with in accordance with the organisation’s disciplinary procedures.

The acceptance of a working engagement with the Company, or appointment to the Board, is sufficient to imply the acceptance of the Code.

**Standards**

The Company seeks to fulfil these obligations according to the original principles laid out in the Nolan Report on standards of behaviour in public life. These principles are set out below. They apply

to all Executive Team and Board Members, and it is expected that they will uphold these principles in their roles.

#### The Nolan Principles

- **SELFLESSNESS** – To serve only the public interest and to never improperly confer an advantage or disadvantage on any person.
- **INTEGRITY** – To not place themselves in situations where their integrity may be questioned, to not behave improperly and, on all occasions, to avoid the appearance of such behaviour.
- **OBJECTIVITY** – To make decisions on merit using the best evidence without discrimination or bias, including when making appointments, awarding contracts or recommending individuals for rewards or benefits.
- **ACCOUNTABILITY** – To be accountable to the public for their actions and the manner in which they carry out their responsibilities and to co-operate fully and honestly with any scrutiny appropriate to their office.
- **OPENNESS** – To be as open as possible about their actions and those of the Company and to be prepared to give reasons for those actions.
- **HONESTY** – To not place themselves in situations where their honesty may be questioned, to not behave improperly and, on all occasions, to avoid the appearance of such behaviour.
- **LEADERSHIP** – To promote and support these principles by leadership and by example and to always act in a way that secures or preserves public confidence.

Accordingly, when acting in your capacity as an Executive Team or Board Member:

- You must, when using or authorising the use by others of the resources or contacts of the Company, ensure that such resources are not used improperly for personal purposes.
- You must act solely in the public interest and the interests of the Company and should never improperly confer an advantage or disadvantage on any person or act to gain financial or other material benefits for yourself, your family, a friend or a close associate.
- You must recognize that you are accountable for your input to the Company and must co-operate fully with whatever scrutiny is applied in any instance where such is applied. You must be as open as possible about your reasoning and actions and the contribution that these make to decisions and actions of the Company. In addition, you should be prepared to give an explanation for your reasoning and actions.
- You must act in a manner respectful of equality and diversity and, at all times, be respectful and courteous in your treatment of your fellow Executive Team and Board Members and others you come into contact with when working with the Company.
- You must not place yourself under a financial or other obligation to outside individuals or organisations that might be reasonably regarded to influence you in the performance of your duties as an Executive Team or Board Member.

When carrying out your duties as an Executive Team or Board Member, you must make all choices based on evidence, including when assisting with the making of appointments or the awarding of contracts or when recommending individuals for rewards or benefits.

You must, by leadership, transparency and example, promote and support high standards of conduct when serving in your capacity as an Executive Team or Board Member, in particular as characterised by the above requirements.

## **Equality and Inclusion**

The Company is committed to developing an inclusive culture to encourage and support a diverse workforce. Executive Team and Board Members must ensure that they treat others fairly, in line with the Company's commitment to achieving equality of opportunity in every area of work.

## **Transparency, Corruption and Bribery**

You must declare any private interests, both pecuniary and non-pecuniary, including membership of any trade union, political party or local authority that relates to your Company duties. Furthermore, you must take steps to resolve any arising conflicts in a way that protects the public interest. This includes registering and declaring interests on the Company Declaration of Interest register.

Executive Team and Board Members must be aware that it is a serious criminal offence for them to corruptly receive or give any gift, loan, fee, reward or advantage for doing or not doing anything or for showing favour or disfavour to any person in their official capacity.

It is important to avoid the perception as well as the fact of corruption or bribery, and Executive Team must comply with all applicable bribery and corruption laws.

## **Gifts and Hospitality**

Gifts and hospitality can only be offered and accepted in certain circumstances and must be declared in line with the Gifts and Hospitality Policy.

Executive Team and Board Members must be aware of and adhere to the Company's Procurement Policy and Travel and Expenses Policy.

## **Whistleblowing**

The Company is committed to the highest possible standards of probity. In line with that commitment, we expect Executive Team and others that we deal with who have serious concerns about the conduct of any aspect of the Company's work to come forward and voice those concerns.

It is recognised that most cases will have to proceed on a confidential basis. Any suspicion of wrongdoing will be treated seriously and will be reviewed and analysed in accordance with the Whistleblowing Policy.

## **Mitigation**

Executive Team and Board Members who become aware of a breach of the Code or other procedures or of any impropriety have a duty to make the matter known to the Head of Operations, who will then inform the envoy.

The general rule is that disclosure should be made at the time the issue, concern or conflict first arises or when it is recognised that an issue or conflict might be perceived. In certain instances, the envoy may determine that the Board should be made aware of relevant issues.

This Code of Conduct for the Executive Team and Board Members was last updated on 9 June 2023.

Who to contact with regard to any matters related to this policy:

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Code of Conduct Policy Issue 1.2