
Sancroft

Code of Conduct

Our commitment to integrity and corporate
responsibility

DATE approved by the board of directors on 05 October 2022

About this code

This code is intended to describe Sancroft's commitment to ethics, fairness and accountability in all ways of working. More detailed information can be found elsewhere, such as our mission, vision and values, purchase authorisation and expenses policies, health and safety procedures and privacy (GDPR) policies. This document describes our core commitments to uphold our values, comply with the law, care for our workforce, and respect our clients and suppliers.

Your responsibility

Any employee that witnesses a violation of any of the provisions of this code – or suspects such a violation, or merely questions whether a violation may be in progress or has occurred – is required to report his or her concerns as soon as possible. Normally, concerns should be reported to the individual's line manager in the first instance, but this may not always be appropriate. Therefore, reports may be made directly to any member of the executive committee, the board of directors or the chief executive, without fear of retaliation or adverse consequence.

Management's responsibility

It is Sancroft's responsibility as your employer to ensure this code is fit for purpose, by reviewing it annually and updating it as required; and to ensure all employees have a thorough awareness of the code, as part of new employees' induction and ongoing employee relations. As part of our commitment to maintaining a safe and respectful working environment, management will investigate any allegations of violation of this code, and will take no retaliatory action against an employee for raising their concerns.

Where to get help and advice

Any questions you may have about this code, its underlying policies and procedures, or its application in practice, may be directed to any member of the executive committee for confidential advice. See part IV. Ethics and Compliance Resources for further advice on applying this code in practice. The management and board of Sancroft further welcome employees' observations or suggestions on how we can improve this code or related documents on an ongoing basis.

I. Compliance, Integrity and Anti-corruption

This section covers financial integrity, including financial records and reporting, expenses and anticorruption.

A. Accuracy of corporate finances and financial reporting

1. Sancroft is committed to running our business on the basis of accurate, reliable and legally compliant financial information. We commit to following international financial accountancy and reporting standards on a daily, monthly and yearly basis to ensure our financial records are trustworthy and suitable for management purposes.

We will ensure we meet our financial reporting obligations to the appropriate authorities at all times.

B. Employee records and expense reports

1. Sancroft commits to keeping accurate and legally compliant records of all costs lawfully incurred in the course of our business. Employees are required to submit receipts for all business-related expenses, whether these are charged to clients or are absorbed into our business costs.

C. Anti-corruption and anti-bribery

1. Sancroft is committed to running a business with integrity, free of all forms of corruption. Sancroft does not pay bribes or facilitation payments, either for our own benefit or that of our clients. We require our employees to operate with integrity at all times. Our further commitments to combat corruption, including anti-competitive behaviour, graft and influence peddling are outlined in the relevant sections below.

II. Conflicts of Interest

This section details our actions to ensure our business dealings are proper and free from undue influence.

A. Gifts and gratuities

1. Sancroft does not seek payment of any sort beyond the fees we legitimately charge our clients for our services and relevant expenses. Small gifts of inconsequential value may be accepted provided they are clearly offered with no expectations or obligations attached. Gifts with a value greater than £100 must be reported to the executive committee or chief executive to ensure they do not counter the intended spirit of this code.

B. Political activity

1. Sancroft from time to time seeks the views of government on topics relevant to the environmental, social and economic strategy and performance of our clients. We also speak with government to share our own expert views and analysis on such topics, which government may be considering. Sancroft does not lobby government to implement the wishes of any client. Our separate policy on political activity provides further detail.
2. Sancroft does not involve itself in the private political views and activities of employees notwithstanding any such activities that may run counter to the principles stated in this code. Sancroft does not instruct nor advise employees on the free exercise of their votes.

C. Family members

1. Sancroft will only seek goods or services from suppliers on the basis of commercial fit and good value for money, and will not favour family members of employees, management and board. Any close personal connections between Sancroft personnel and the clients, suppliers or partners with which Sancroft does business must be disclosed to the chief executive or executive committee for review.

D. Disclosure of financial interests

1. Sancroft employees are required to have no financial interests in outside businesses, which would give rise to conflicts of interest. Any such interests must be fully disclosed to the chief executive or executive committee for consideration and approval by the board and/or executive committee. This excludes ordinary shares, bonds or other investments employees may hold as part of a pension or portfolio.

III. Employee, Client and Vendor Information

This section addresses how we handle certain information to meet legal requirements and strive to protect privacy.

A. Maintaining records and information

1. Sancroft requires certain personal data related to those people with an interest in our business, including (but not limited to) clients and former clients. We hold and process such information in accordance with applicable financial conduct, privacy and data protection laws. Further information can be found in our separate Privacy Policy.
2. Sancroft requires certain personal data related to our employees in order to fulfil legal obligations as an employer. We take all reasonable steps to ensure we hold and process this data in a secure and responsible fashion, in accordance with all applicable legislation. Employees have the right to access their personal data in accordance with the law. Our procedures are further detailed in our separate Privacy Policy.

B. Disclosure of information

1. Sancroft may from time to time be required to disclose personal information, for example for reasons of legal compliance or to fulfil contractual obligations; or where Sancroft has received permission of the individual to do so. Further detail is available in our separate Privacy Policy.

IV. Employment Practices

This section covers our commitments to the highest standards of workplace quality.

A. Workplace harassment

1. Sancroft is committed to providing a safe, respectful working environment that respects our employees as individuals and fosters their development personally and professionally. We do not tolerate harassment in any form. Any alleged instances of harassment or workplace hostility should be immediately reported to the chief executive or any member of the executive committee or board of directors.

B. Equal opportunity

1. Sancroft aspires to be a workplace where diverse individuals thrive and develop based on their efforts and merit, regardless of background. Sancroft does not discriminate in employment or advancement on the basis of sex, ethnicity, religious affiliation, sexual orientation or any other status in contravention of the law and highest standards of corporate responsibility.

C. Diversity

1. Sancroft seeks to create a welcoming environment for people of all backgrounds. We seek to ensure opportunities are publicised to attract diverse candidates, and encourage candidates from under-represented groups to apply for positions at Sancroft. We value the diverse views and experiences of our people, and seek to encourage people to express those views in the knowledge that they will be respected by their peers and by Sancroft management.

D. Fair treatment of staff

1. Sancroft is committed to treating all employees consistently according to clear principles, while recognising and valuing each individual uniquely. In all matters, we seek to uphold a consistent and fair means of working together, which does not unduly favour or discriminate against any individual. We commit to protect whistle-blowers and to refrain from any retaliation in the event an employee reports an adverse situation or violation of any provision of this Code.

E. Employee health and safety

1. Sancroft seeks to create a safe and healthy working environment, dedicated to an holistic understanding of wellness. Our specific health and safety policies and procedures are available separately. We also seek to support the safety, health and security of our employees when they are travelling for work reasons, and look for opportunities to improve our performance in this area continually.

V. Environmental Issues

This section addresses Sancroft's environmental initiatives.

A. Commitment to sustainability

1. Sancroft is a sustainability consultancy, founded on the commitment to assist our clients in achieving better performance on environmental, social and economic impacts. Our workplace is designed to minimise our own operational environmental impacts, and we strongly encourage employees to raise any observations and ideas related to how we might do this better.
2. Sancroft's internal environmental practices focus on energy conservation, waste segregation and recycling, responsible purchasing and travel minimisation.

VI. Ethics and Compliance Resources

This section describes how Sancroft will seek to apply this Code in practice.

1. Sancroft operates an open and honest corporate culture. In addition to individual line managers, each individual employee is invited to contact any member of the executive committee, the board of directors or the chief executive at any time with questions or concerns about an ethical or compliance issue, regardless of anything set out in this code.
2. Employees that report their concerns about ethics or compliance will be protected, including, if appropriate, through anonymity, and will be advised of the outcomes of any investigations made as a result.

3. Violations of any of the provisions of this code will be thoroughly investigated by the executive committee (where appropriate; the chief executive, chairman and/or board may serve this purpose if necessary), and those found to be responsible for any confirmed violations will be disciplined in the appropriate way, including termination in the most severe cases.
4. Sancroft will always uphold the provisions of all applicable employment law, as well as the legal and contractual obligations we have toward employees, clients, suppliers and partners.
5. Sancroft is committed to monitoring its implementation of this code and its underlying policies and procedures in light of real-world experience, and will regularly review the outcomes of any investigations or decisions made as a result of this code or its implementation.