



MAP BioPharma Public Affairs Code of Conduct

MAP believes in high professional standards and this Code of Conduct covers every employee of MAP and every consultant or agent acting on the company's behalf.

1. We will approach engagement with clients, government bodies and other stakeholders with honesty and integrity.
2. We will seek to ensure the truth and accuracy of all statements made and information provided to clients and external stakeholders. Where information is unverified, this will be clearly identified.
3. We will not ignore inconvenient facts or relevant considerations when providing advice or taking decisions.
4. We will provide advice to clients which is fair and balanced to assist them in making informed decisions.
5. We will not make extravagant, exaggerated or inaccurate claims to clients about the nature and extent of our influence.
6. We will always seek to disclose the identity of clients when engaging on their behalf with government bodies and wider stakeholders.
7. We will take an ethical approach to engagement with government institutions and advise clients if any proposed activities may be illegal, unethical or contrary to professional practice, retaining the right to refuse to act for a client in pursuance of any such activity.
8. Where a conflict of interest occurs, we will either seek informed permission from the parties involved or resign the relevant client work to avoid any conflict.
9. We will ensure an independent and objective consideration of any complaint under this Code or any related guidance (including an allegation of a breach of the same). In particular, should a complaint be raised, we will promptly seek to agree with the complainant an appropriate, independent adjudicator to oversee and control the complaint process. Such independent adjudicator will typically be a competent lawyer independent of both parties. Any adjudication decision will be binding on both parties and will be made publicly available on the MAP BioPharma website and shared with the Registrar of Consultant Lobbyists.
10. Save for entertainment and token mementoes, we will not offer, give or receive any financial or other incentive to any member or government representative, whether elected, appointed or co-opted, that could be construed in any way as a bribe or solicitation of favour. We will also recommend that clients follow the same approach.

11. We will keep strictly separate from our duties and activities as public affairs consultants, any personal activity or involvement on behalf of a political party, including as an office holder or candidate for office. If any reference is made to matters of relevance to MAP clients during these activities, we will declare our interest.
12. We will abide by the rules and conventions for obtaining, distribution and release of documents published by any government institutions.
13. We will take into account the requirements of the ABPI Code of Conduct in our engagement with government bodies, Parliamentarians and other stakeholders.
14. Senior managers have responsibilities to their staff and work colleagues to ensure that actions are just and ethical; that they are free to make suggestions and complaints; and that they are treated with respect and on their merits.
15. We will ensure that all relevant clients are aware of the MAP Public Affairs Code of Conduct and the commitments therein.

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