Code of Business Conduct

Our approach

This Code sets out how we expect everyone at Milbank to behave - towards each other, towards our customers and partners, and in the way we do business. It does not try to cover every possible situation. It sets out the standards we all follow, every day.

Integrity

We do business honestly and transparently. We do not offer, accept or tolerate bribes or corrupt payments of any kind. If you are offered a bribe, or asked to make one, report it immediately to your manager or Managing Director.

Conflicts of interest

If you have a personal interest that could conflict - or appear to conflict - with your duties at Milbank, you must declare it. This includes outside business interests, financial interests in suppliers or competitors, and close personal relationships with colleagues you manage or who manage you.

Declaring a conflict is not a problem. Hiding one is.

Gifts and hospitality

Small, occasional gifts and reasonable hospitality are a normal part of business. But they must never be used to influence a decision. If you are offered a gift or hospitality that feels excessive, or if you are unsure, speak to your manager.

Confidentiality

You will have access to information that is confidential to the business, our clients, and your colleagues. You must not share this information with anyone who is not authorised to have it - either during your employment or after it ends.

Use of company resources

Company equipment, systems and materials are for business use. Reasonable personal use is generally accepted, but excessive or inappropriate use is not. Use common sense.

Social media and public statements

You are free to use social media in your personal life. But please do not post anything that could damage Milbank's reputation, breach confidentiality, or be offensive to colleagues, customers or the public. If in doubt, do not post.

Reporting concerns

If you become aware of conduct that breaches this Code - by anyone, at any level - please report it. You can speak to your manager, the People Team, or use the Whistleblowing policy. You will be protected from retaliation.

Consequences

Breaching this Code may result in disciplinary action, up to and including dismissal. Serious breaches may also have legal consequences.

Questions

If you are unsure whether something you are doing, or being asked to do, is in line with this Code, please speak with your manager or Managing Director. It is always better to ask.

milbankgroup.co.uk

Version	Date	Author	Changes
V1	-	Milbank Group	Creation
V2	30/04/2026	Milbank Group	Approved