



MEDIA GROUP

Bauer Consumer Media Limited ("BCML")

IPSO ANNUAL STATEMENT

8 September to 31 December 2014 (the "Reported Period")

Bauer Consumer Media Ltd company number: 01176085 Registered office 1 Lincoln Court, Lincoln Road Peterborough PE1 2RF. Bauer Radio Ltd company number 1394141 Registered office 1 Lincoln Court, Lincoln Road, Peterborough PE1 2RF. Both registered in England and Wales

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MEDIA GROUP

1. INTRODUCTION

BCML is one of Bauer Media's UK companies and is part of the Bauer Media Group, a worldwide media empire offering over 300 magazines in 15 countries, as well as online platforms, TV channels, and radio stations.

BCML joined the Bauer Media Group in January 2008 following the acquisition of Emap PLC's consumer and specialist magazine, radio, online and digital businesses.

Our magazine heritage stretches back to 1953 with the launch of Angling Times and the acquisition in 1956 of Motor Cycle News, both still iconic brands within our portfolio. Continuing its history of magazine launches, Closer was launched in 2002 and Britain's first weekly glossy, Grazia, was launched in 2005. The most recent addition to our portfolio came with the launch of The Debrief, a digital only brand, which was launched in February 2014

Today, BCML comprises 80 influential brand names, covering a diverse range of interests including: Empire, Mojo, Q, heat, Parkers, Match, Car and Yours. A full list of our titles is set out below:

- | | | |
|----------------------|----------------------------|----------------------|
| - AM | - Kerrang! | - Top Sante |
| - Angling Times | - Land Rover Owner | - Trail |
| - Bike | - Landscape | - Trail Running |
| - Bird Watching | - Match! | - Trout & Salmon |
| - Car | - MCN | - Trout
Fisherman |
| - Car Mechanics | - Model Rail | - The Debrief |
| - Classic Car Weekly | - Mother & Baby | - What Bike |
| - Classic Cars | - Parkers | - Yours |
| - Closer | - Performance Bikes | |
| - Country Walking | - Pet Product
Marketing | |
| - Digital Photo | - Practical Classics | |
| - Empire | - Practical Fishkeeping | |
| - Fleet News | - Practical Sportsbikes | |
| - Garden Answers | - Q | |
| - Garden News | - Rail | |
| - Gold World | - Ride | |
| - Grazia | - Sea Angler | |
| - Heat | - Steam Railway | |



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The Responsible Person for BCML is Tina Sany-Davies, General Counsel.

2. OUR EDITORIAL STANDARDS

We recognise the imperative for our journalists to provide good, interesting, relevant and accurate stories for publication in our titles which enables the titles to maintain their position in a highly competitive market place. Notwithstanding this, it remains the case that we require our journalists and contributors to adhere at all times to the legal and ethical responsibilities to which we have always been committed.

It therefore remains the individual and overriding responsibility of each member of editorial staff and of all non-staff contributors to ensure that their behaviour and conduct in researching, securing or presenting for publication any story material is in full compliance with the Editors' Code and all relevant legal authorities.

We maintain operational guidelines for story gathering which encourage record keeping, double sourcing and rigorous verification of all information and sources. These internal practices ensure that articles have a credible source and that the information the source has provided is accurate and/or verifiable

Certain publications have legal retainers in place with specialist law firms who, along with the in-house legal team, provide regular training sessions and pre-publication review services. Stories are read and assessed pre-publication by a senior editor and/or sub-editor to ensure the content is compliant with the Editors' Code, and if there are any doubts about veracity or legality of the content then it will be referred to the in-house legal team, or specialist law firm.

All editorial staff are advised that they are permitted to contact IPSO directly, should they have any specific pre-publication queries. During the Reported Period, we have also sought guidance from IPSO in relation to post-publication matters.



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3. OUR COMPLAINTS-HANDLING PROCESS

We treat every editorial complaint seriously and accept complaints made in any form. We have a comprehensive Complaints Policy (see **Appendix 1**) consistent with other publishers in the magazine industry. All mastheads include IPSO complaints information and all websites for our titles include a clear "complaints" link at the bottom of every webpage (see **Appendix 2**) through which users may access our Complaints Policy.

The Complaints Policy sets out a detailed explanation of what is or is not covered by the Complaints Policy, how to complain, how the complaint will be processed and what the complainant should do if they are not satisfied with the response given. Additionally, our Complaints Policy provides a link to, and contact details for, IPSO should complainants be dissatisfied with the information provided on our complaints form or our response.

Our Complaints Policy provides an email address for complaints: complaints@bauermedia.co.uk. This mailbox is managed by the in-house legal team. If a complaint is sent directly to an editor, they will forward the email to the complaints mailbox address to ensure it is handled and recorded centrally.

Whilst, our Complaints Policy is intended only for editorial complaints concerned with potential breaches of the Editors Code ("Editorial Complaints") in practice, we receive a number of queries to this mailbox that are unrelated to editorial complaints or issues. As a result, we are looking to introduce a complaints form to filter adhoc and non-relevant emails.

Details of all complaints received are recorded by the legal team, including: the name of the complainant; the nature of the complaint; the publication and article; the date the complaint was received; whether an acknowledgement email has been sent and the date on which it was sent; any action taken and any response received from the complainant.



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Editorial complaints are always shared with the relevant publication and editorial team concerned. They will work in collaboration with the legal team and/or external legal advisers to investigate and respond to editorial complaints, seeking a mutually acceptable resolution where possible.

4. OUR TRAINING PROCESS

Prior to the launch of IPSO and the new system of UK press regulation, BCML's CEO sent a communication to all senior editorial staff and BCML management, reminding them of the launch of IPSO on 8th September 2014. This encouraged each senior members of staff to attend newly created IPSO training sessions and to encourage (and support) their staff to do the same. Please note that these IPSO training sessions are in addition to the usual legal training programme provided to editorial staff by the in-house legal team and specialist libel law firms.

Following the launch of IPSO, BCML's internal legal team embarked on a comprehensive training programme dedicated to informing all editorial staff with IPSO and the new regulatory system, together with refreshing their understanding of the Editors' Code. Across the Reported Period, we have run over 30 training sessions regarding IPSO which have been attended by 72% of editorial staff. Please note that this figure does not include the usual legal training provided to editorial staff

All persons that have attended a training session have been provided with a copy of:

- The Training Presentations (see Appendix 3).
- The Editors' Code; and
- Bauer's Complaints Policy.

BCML's internal legal team maintain a record detailing:

- All editorial staff who are required to undertake IPSO training;
- Their position, role and publication;
- Whether they have attended a training session; and
- The date of the training session they attended.



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During the Reported Period, BCML identified a total number of 329 employees who required IPSO training. Of these individuals 237 have undergone the relevant training.

Training is on-going and continues to be scheduled frequently at all of BCML's office locations. This ensures that editorial staff who have not attended, together with new joiners, and/or staff who would like to refresh their knowledge have an opportunity to attend.

The legal team continually update the training record and monitor the percentage of editorial staff trained to ensure that an appropriate number of training sessions are provided.

Editorial staff who have failed to attend IPSO training are sent email reminders advising of the next session they can attend. Staff who continually fail to attend training are reported to their superior. In extreme cases, there is scope to escalate this to management level, although during the Reported Period, we have not needed to do so.

5. OUR RECORD ON COMPLIANCE

Period BCML has not received an Editorial Complaint during the Reported Period which has been ruled or adjudicated upon by IPSO.

11th September 2015

Bauer Consumer Media Limited Editorial Complaints Policy

We take all complaints about editorial content seriously and are committed to abiding by the Independent Press Standards Organisation (“IPSO”) rules and regulations and the Editors’ Code of Practice that IPSO enforces (the “Editors’ Code”).

1. What is a complaint?

- When making a complaint, you must clearly state that your complaint is a formal complaint under this policy.

2. What does this policy cover?

- This policy only applies to complaints about editorial content in our publications and digital services that we control in the UK, Channel Islands and Isle of Man. It does **not** cover:
 - complaints about TV and radio services (which are regulated by Ofcom, ATVOD and/or the BBC Trust);
 - complaints about advertising (which are regulated by the Advertising Standards Authority);
 - concerns about matters of taste/decency and due impartiality;
 - complaints about books;
 - complaints about 'user generated content' (i.e. material on our digital services e.g. websites or apps that is not posted by us or on our behalf) which we have not reviewed or moderated; or
 - any complaint that falls outside the remit of IPSO.

3. How to complain

- Complaints should be made in writing, either by email to complaints@bauermedia.co.uk or by post to Bauer Consumer Media Limited, Endeavour House, 189 Shaftesbury Avenue, WC2H 8JG and addressed to The General Counsel.
 - complaints under this policy will only be accepted within four months from the date of the behaviour or first publication of the article that you are complaining about. Where an article remains accessible on our website, complaints will be accepted up to 12 months from the date of the behaviour or first publication of the article that you are complaining about.
- When making your complaint you must include:
 - a copy of the article in question, or a link to the relevant webpage or a web address if the complaint is about published material (or reference to the publication title, issue date, page and article title if a copy is unavailable);
 - a written explanation of your concerns, **with reference to the Editors’ Code**;
 - any other documents that will help us assess your complaint.
- Complaints received without this essential information cannot be considered. We may seek further details after your initial contact. If you cannot provide the requested information we may be unable to consider your complaint.
- We will consider complaints from (a) any person who has been directly affected by the matter complained of; or (b) from a representative group affected by an alleged breach of the Editor’s Code which is significant and of substantial public interest; or (c) from a third party seeking to correct a significant inaccuracy of published information.

- We reserve the right to reject, without further investigation, complaints that show no breach of the Editors' Code; or that are trivial, hypothetical, gratuitously abusive or offensive, or otherwise vexatious or insignificant;
- If you are taking legal action, we may be unable to consider your complaint.

4. What happens to your complaint?

- The complaints process is free of charge irrespective of the outcome of your complaint.
- We aim to acknowledge your complaint within 5 working days of receipt. You agree to respond promptly to any request for further information.
- If we receive multiple complaints about the same issue we may make one response to all.
- We will provide you with our response to your complaint within 28 days of receiving everything we need from you to allow us to investigate. If we fail to meet this timescale, you can take your complaint to IPSO.
- We will always treat you courteously and with respect. We expect the same from you.

5. Complaint to IPSO on exhaustion of our complaints procedure

- If you are unhappy with our final response to your complaint you may complain to IPSO (<http://www.ipso.co.uk>). IPSO offers, without charge, a complaints handling service to the public in cases where there has been a disagreement between a complainant and us about whether the Editors' Code has been breached. We will be asked to confirm that our complaints procedure has been exhausted and will do so in writing.

6. Policy Changes

- We reserve the right to amend this policy as required to ensure compliance with IPSO regulations. We will publish a link to the current policy on our website. Your complaint will be considered against the published policy on the date of receipt of your complaint.

7. IPSO Contact Details

- Website: www.ipso.co.uk .
- Address: Independent Press Standards Organisation, c/o Halton House, 20-23 Holborn, London EC1N 2JD, Tel: 0300 123 2220.
- Email for complainants: complaints@ipso.co.uk.
- Inquiries: inquiries@ipso.co.uk.
- Advice: advice@ipso.co.uk.

Published 08 September 2014

ashpearlman
ter.com/grazia_live
ziadaily.co.uk

September 2015



Did you know that in some parts of the country, women effectively work for free for two hours every day? While *Grazia* changed the law to help end pay inequality, we still have a long way to go (see page 50). And the most exciting thing is you can help end it – today. It's about empowering ourselves – just one conversation could change what we earn (really! See page 75). And yes, we might no longer be in school, but the onset of September somehow still feels like a new beginning. Shopping bags have been piling up around the office (we're as addicted as you) and we have a bumper 'back to cool' issue for you, from the hot new geek-chic accessories (page 32) to the hippiest fashion you'll ever own (page 45) – and not forgetting the *Grazia* x OFFICE *Shoespaper*. I hope you'll love the whole issue and can't wait for your views.

PS Get ahead of the game – and shop direct from the page – by downloading *Grazia* to your iPad, iPhone, tablet or smartphone.



GRAZIA

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BAUER MEDIA

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For internships and work experience opportunities at *Grazia*, please head to gothinkbig.co.uk

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Grazia magazine, Endeavour House, 189 Shaftesbury Avenue, London WC2H 8JG; www.graziadaily.co.uk

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COMPLAINTS: Bauer Consumer Media Limited is a member of the Independent Press Standards Organisation (www.ipso.co.uk) and endeavours to respond to and resolve your concerns quickly. Our Editorial Complaints Policy (including full details of how to contact us about editorial complaints and IPSO's contact details) can be found at www.bauermedia.com/complaints.co.uk. Our email address for editorial complaints covered by the Editorial Complaints Policy is complaints@bauermedia.co.uk.

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IPSO – THE NEW PRESS REGULATOR

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WHAT IS IPSO?

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IPSO is the new press regulator – full name the Independent Press Standards Organisation CIC

IPSO launched on 8th September 2014

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WHY AM I HERE?

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- Bauer has signed up to IPSO along with the majority of the large magazine publishers and most of the national newspapers
- Every IPSO signatory must implement and maintain effective and clear internal governance practices and procedures to ensure compliance with the Editors' Code and the IPSO Regulations
- We need to make sure that everyone who works for our titles is trained and understands what is required of us
- As publishers, editors and senior staff we want to ask for your help in complying with the Regulations

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WHAT WILL THIS TRAINING COVER?

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- Background and Leveson
- What has happened since Leveson?
- What does IPSO regulate?
- What does IPSO do?

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WHAT WILL THIS TRAINING COVER?

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- What are our IPSO obligations?
- Complaints about breaches of the Editors' Code
- Standards Investigations
- IPSO's Powers
- How you can help us comply with IPSO.

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HISTORY OF IPSO

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- IPSO has its roots in the phone hacking scandal which dates back to 1999
- First conviction of a journalist in 2007
- News of the World closed in July 2011
- Leveson Inquiry announced in 2011

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THE LEVESON INQUIRY

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- An inquiry chaired by Lord Justice Leveson into the "culture, practices and ethics of the press"

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WHAT DOES IPSO REGULATE?

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- all of our magazines and electronic services which are published or targeted at an audience in the UK, Channel Islands and Isle of Man
- includes all text, pictures, readers' letters, videos and interactive services, web sites and apps etc operated or owned by us

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WHAT IS NOT COVERED BY IPSO?

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- radio broadcasts and associated web sites
- advertising
- taste/decentcy and due impartiality
- legal or contractual matters which in IPSO's view would be better dealt with elsewhere
- books
- User Generated Content
- disputes between publishers.

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WHAT DOES IPSO DO?

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- handles complaints about breaches of the Editors' Code
- deals with Standards Investigations and compliance
- records and publishes breaches of Editors' Code
- provides confidential, non-binding guidance to members including on the Editors Code
- sends out notices about intrusion
- provides a confidential whistleblowing hotline for those who have been asked to act contrary to the Editors' Code
- provides an arbitration service if required.

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WHAT OBLIGATIONS DOES IPSO PLACE ON US?

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Obligations include:

- Compliance with Editor's Code by all our employees, officers, freelancers, agents and sub-contractors
- Compliance with IPSO Regulations by all employees, officers, freelancers, agents and sub-contractors
- Internal Governance – we must implement and maintain effective and clear internal governance practices and procedures to ensure compliance with the Editors' Code and the Regulations.

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WHAT OBLIGATIONS DOES IPSO PLACE ON US?

- Complaints - we must implement and maintain effective and clear procedures for the reasonable and prompt handling of complaints including an accessible internal complaints procedure. Note our new policy at <http://www.bauermediacomplaints.co.uk>.
- Co-operation - We must act in an open and co-operative way towards IPSO.
- Whistleblowing –No-one can be disciplined for reasonably using IPSO’s new whistleblowing hotline or refusing to do something which they believe to be in breach of the Editors’ Code. If you have an issue or concern, please also discuss this with your manager or a member of the legal team. The whistleblowing hotline number is 0300 123 2220.

WHAT OBLIGATIONS DOES IPSO PLACE ON US?

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- We must abide by IPSO's decisions and requirements
- Appointment of a responsible person - The IPSO responsible person who will report annually to IPSO will be the General Counsel – Tina Sany-Davies
- Annual Statement - We must provide an annual statement to IPSO telling them what we have done to comply

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WHAT IS THE EDITOR'S CODE?

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- Sets the benchmark for the ethical standards expected of the Press
- It must be honoured both to the letter and in the full spirit
- It must be applied to print and digital publications and all staff and external contributors (freelance workers) must comply

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COMPLYING WITH THE EDITOR'S CODE

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- Accuracy
- Opportunity to Reply (to inaccuracies)
- Privacy
- Harassment
- Intrusion into grief or shock
- Children (no interviews/photos with under 16s without parental consent)
- Children in sex cases
- Hospitals

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COMPLYING WITH THE EDITOR'S CODE

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- Reporting of crime
- Do not seek to obtain or publish material acquired by clandestine devices or subterfuge This includes: material acquired by using hidden cameras or clandestine listening devices, or by intercepting private or mobile telephone calls, messages or emails; or by the unauthorised removal of documents or photographs; or by accessing digitally-held private information without consent
- Victims of sexual assault
- Discrimination
- Financial journalism
- Confidential sources
- Witness payments in criminal trials
- Payment to criminals

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PUBLIC INTEREST EXCEPTIONS

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- Some violations of the Code are justified if it is in the public interest, i.e.:
 - Detecting or exposing crime or serious impropriety;
 - Protecting public health and safety;
 - Preventing the public from being misled by an action or statement of an individual or organisation
- If a public interest justification is given for a Code violation, editors must show that they reasonably believed the publication (or journalistic activity undertaken with a view to publication), would be in the public interest and how, and with whom, that was established at the time

HOW DOES IPSO HANDLE COMPLAINTS ABOUT BREACHES OF THE EDITORS' CODE?

- IPSO offers a complaints handling service to those who disagree with our decision that there has been no breach of the Editors' Code.

Complaints can be considered by IPSO:

- (a) from anyone who has been personally and directly affected by the breach of the Code
- (b) where there is a significant alleged breach and substantial public interest in IPSO considering the complaint and a representative group affected by the breach have complained and
- (c) from a third party seeking to correct a significant inaccuracy of published information.

HOW DOES IPSO HANDLE COMPLAINTS ABOUT BREACHES OF THE EDITORS' CODE?

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- Complaints Committee will try mediation first e.g. by negotiating a correction/apology with us if they think there has been a breach.
- If mediation does not work, Complaints Committee will make a decision
- Sanction for breach is requirement to publish correction and/or the Adjudication. IPSO will decide on nature, extent and placement of correction and adjudication taking into account our comments.

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WHEN WILL IPSO REFUSE TO CONSIDER A COMPLAINT ABOUT BREACHES OF THE EDITORS' CODE?

- IPSO can reject without investigation complaints which show no breach of the Code or are without justification eg attempts to argue a point of opinion or to lobby and/or vexatious and disproportionate complaints.
- Complaints will only be accepted within 4 months of the behaviour or conduct unless material is still online in which case it is 12 months from first publication
- IPSO won't usually consider a complaint until our internal complaints process has been exhausted unless we have failed to respond.

STANDARDS INVESTIGATIONS

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IPSO can start a standards investigation:

- if there have been serious and systemic breaches of the Editors' Code
- if there have been one or more failures to comply with the requirements of IPSO Board
- if IPSO reasonably thinks investigation is desirable because substantial legal issues or Editors' Code compliance issues raised about the practices of a member
- if annual statements identify significant issues of concern - either in relation to a single incident, our compliance processes or a pattern of significant, serial or widespread breaches of the Editors' Code
- if IPSO believes that there have been substantial Editors' Code compliance issues identified on the part of one or more members i.e. an industry problem

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WHAT POWERS DOES IPSO HAVE IN RELATION TO INVESTIGATIONS/COMPLAINTS UNDER THE EDITORS' CODE?

IPSO can:

- compel us to provide documents and materials
- impose sanctions and fines/costs awards following standards investigations or require us to take other remedial action. Fines can be up to 1% of annual turnover of the publication – maximum of £1 million.
- terminate our membership

WHAT CAN YOU DO TO HELP US COMPLY WITH IPSO?

- Ensure you know about and have access to the Editors' Code and to Bauer's Editorial Guidelines (available on Mediavine at: <http://mediavine.bauermedia.co.uk/Interact/Pages/Section/SubFullOne.aspx?subsection=3951>)
- Help ensure that everyone working on our titles knows that training is compulsory and attends training sessions when invited
- If you are using external advisers/agencies, let the legal department know so that we can assess whether they need to be trained

WHAT CAN YOU DO TO HELP US COMPLY WITH IPSO?

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- Tell us about any complaints straight away, preferably the same day as receipt
- Speak to us before responding to complaints
- Speak to us about any questions or concerns you have regarding compliance or standards
- Immediately report any “standards” issues or concerns you have to the General Counsel i.e. Tina Sany-Davies

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