



IPSO Submission – March 2024

1.1 Factual information about the Regulated Entity 1.1

List of titles/products ([see supporting document](#))

1.2 Name of Responsible Person

Haymarket Media Group's responsible person is Brian Freeman, Chief Financial Officer.

1.3 Overview of Regulated Entity

[Haymarket Media Group](#) is a privately-owned media, data and information company, shaping a better future with remarkable content for specialist audiences across the world. The company has 1,300 employees across offices in the UK, US, Canada, Hong Kong, Singapore, India, Germany and the Netherlands.

Haymarket's portfolio consists of more than 70 market-leading brands including [Campaign](#), [What Car?](#), [MyCME](#) and [Asian Investor](#).

Through live, digital, print, education, data, tech services, video and audio, Haymarket's brands inspire, inform and empower clients and communities internationally.

www.haymarket.com

2.0 Internal manuals, codes or guidance

Haymarket in the UK has the following internal manuals used by journalists:

- Haymarket's Code of Conduct
- Haymarket's Social Media Guidelines
- Haymarket's Anti-Bribery and Corruption Policy
- Editors' Code of Practice

3.0 Compliance procedures

Where required, editors and journalists seek advice from IPSO in advance of publishing articles to consider matters of compliance with the Editors' Code. This advice is then considered alongside editorial guidance and the public interest when refining and publishing any articles.

3.1 Our editorial standards

3.1.1 Compliance with the Editors' Code

Copies of the Editors' Code are supplied to all journalists, as well as copies listed on the intranet (Haymarket Link) and shared drives.

Where the Regulator finds against a publication in the course of assessing a complaint, the publication will comply with the findings and any remedial action required.

The most recent [Editors' Code](#) was circulated again to all editorial employees from their editorial leads in the first quarter of 2024's calendar year. This is done on an annual basis and shared with all new editorial employees too.

Editorial meetings are held regularly (daily and weekly) by editors with their teams.

3.1.2 Complaints handling

Haymarket Media Group has a standard complaints procedure across all publications, which is published on the website of each title and hosted on the company's corporate website.

Members of the public can register an editorial complaint under this procedure by completing an online form, or by submitting a complaint in writing to the company address.

The page contains detailed information on how to make a complaint, what the Complaints Policy covers and clearly refers to the process adhering to the requirements of the Regulator, IPSO. <https://www.haymarket.com/complaints/>

Complaints received in line with the published procedure, or referred from IPSO, are logged on a complaints record and then assessed by the responsible person, who will seek to resolve the matter with the complainant. Complaints that fall outside the procedure, i.e. are not editorial complaints, are logged and referred to the relevant department/person.

Wherever the Regulator rules against a publication, the publication complies with the findings and any remedial action required.

The IPSO mark is displayed in the majority of Haymarket's titles and is clearly visible on Haymarket's [website](#).

3.1.3 Verification of stories

Journalists and editors take all appropriate steps to confirm stories and take legal advice when necessary.

When conducting interviews, all journalists identify themselves as such, are familiar with on and off the record practices and keep detailed records.

3.2 Our record on compliance

There have been no adverse adjudications against Haymarket for this annual reporting period.

3.3 Our training process

When required, Haymarket arranges training sessions to update employees on regulatory changes. New joiners are supplied with all relevant policies and procedures via the company's Intranet (Haymarket Link), including a copy of the Editors' Code. The Editors' Code is also circulated with all editors.

We partner with our media lawyers, Lewis Silkin, and our training provider Content ETC to ensure employees can undertake law refresher training for all content producers. The workshop covers key topics such as Copyright, Trademarks, Libel, Privacy & Confidence, Data Protection, Contempt and The Editors' Code.

Our employees also have access to legal advice for each of their brands, which they are actively encouraged to use. We have a pre-pub arrangement in place with Lewis Silkin where anyone can send a piece of journalism they intend to publish to Lewis Silkin for clearance and the legal advice is paid for directly by the brand/division.

We have dedicated Learning & Development support and regularly provide various training, workshops, courses and mentoring for editorial teams, and do our utmost to help employees with any additional training requests.

Appendix

All relevant documents are attached.

Publication	Website
Autocar	autocar.co.uk
Campaign	campaignlive.co.uk/
Car & Aftermarket Trader	catmag.co.uk
Classic and Sports Car	classicandsportscar.com
Conference & Incentive Travel	citmagazine.com
ENDS Waste & Bioenergy	endswasteandbioenergy.com
ENDS Europe	endseurope.com
ENDS Report	endsreport.com
GP	gponline.com
Horticulture Week	hortweek.com
Management Today	managementtoday.co.uk
GP Business	gpbusiness.co.uk/
MIMS	mims.co.uk/
MIMS Learning	mimslearning.co.uk/
Move Electric	moveelectric.com/
Partnerships Bulletin	partnershipsbulletin.com/
P3 Bulletin	partnershipsbulletin.com/p3bulletin
People Management	peoplemanagement.co.uk/
Performance Marketing World	performancemarketingworld.com/
PlacemakingResource	placemakingresource.com
Planning Resource	planningresource.co.uk
PRWeek	prweek.com
Third Sector	thirdsector.co.uk
What Car	whatcar.com
Windpower Monthly	windpowermonthly.com
Work Magazine	peoplemanagement.co.uk/work
World Architecture News	worldarchitecturenews.com/
World Interiors News	worldarchitecturenews.com/interiors
Health and Safety International	healthandsafetyinternational.com/
OSE Directory	ose.directory/
AWE International	awe.international/



Haymarket Media Group: Code of Conduct

Contents

1. [Purpose](#)
 2. [Scope](#)
 3. [Policy statement](#)
 4. [Our purpose and values](#)
 5. [Ethical business standards](#)
 - 5.1. [Our commitment to diversity, equity and inclusion \(DEI\)](#)
 - 5.2. [Our commitment to being a socially and environmentally responsible business](#)
 - 5.3. [Our commitment to our community](#)
 6. [Conflicts of interest](#)
 - 6.1. [Duty of loyalty](#)
 7. [Anti-bribery and corruption](#)
 - 7.1. [Hospitality, gifts and entertainment](#)
 - 7.2. [Gifts](#)
 - 7.3. [Donations](#)
 - 7.4. [Risk assessments and due diligence](#)
 - 7.5. [Reporting and whistleblowing](#)
 8. [Outside business activities](#)
 9. [Communicating with regulators & others](#)
 10. [Employee use of Haymarket's IT systems and technology](#)
 - 10.1. [Social media](#)
 11. [Business information](#)
 - 11.1. [Accurate records](#)
 - 11.2. [Confidentiality and privacy](#)
 - 11.3. [Confidentiality and trade secrets](#)
 - 11.4. [Intellectual property](#)
 12. [Procurement and third parties](#)
 - 12.1. [Agents/consultants and third parties](#)
 13. [Failure to follow Policy](#)
 - 13.1. [Enforcement/penalties](#)
 - 13.2. [Waivers](#)
 - 13.3. [Reporting concerns](#)
-

1. Purpose

Our Code of Conduct sets out the standards of behaviour expected of everyone at Haymarket Media Group. Employee responsibilities are to be open, accountable and professional at all times.

We must be honest and ethical in all of our business practices and comply with any legislation or laws that apply to us and to Haymarket Media Group.



2. Scope

This Code of Conduct applies to everyone working for Haymarket Media Group and includes people who are on agency, casual and freelance contracts as well as employees (collectively referred to as workers in this policy).

This policy does not form part of any terms and conditions of employment and may be amended by us at any time.

3. Policy statement

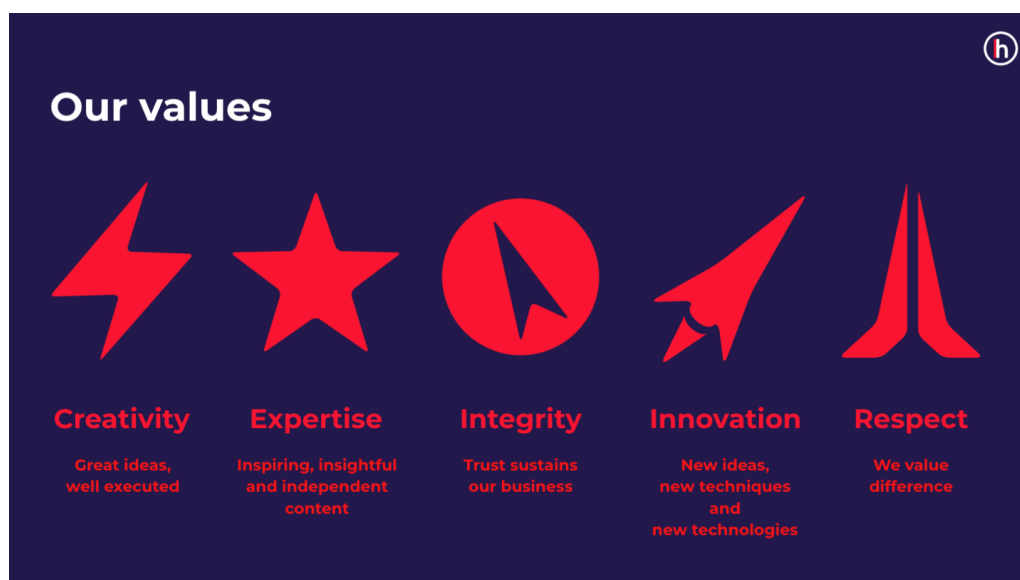
This policy does not claim to answer all questions that might arise. For that, we must ultimately rely on each person's judgement and good sense, including recognising when it is proper to seek guidance from others on the appropriate course of conduct. The aim of the policy is to preserve and enhance Haymarket Media Group's reputation by ensuring we not only adhere to legislative frameworks but are also guided by best practice business ethics.

Please read these guidelines carefully, we expect everyone to comply with them.

4. Our purpose and values

We are a media, information and data business.

Our purpose is to use our expertise in media and information to inspire, inform and empower our clients, audiences and communities. And it is our remarkable content that sets us apart.



Our values underpin everything we do, and, like our business, they have evolved over the years.

Creativity, Expertise and Integrity have been our core values for over a decade - without them we wouldn't be as successful as we are today. But times have changed and we have now introduced two new values:



Innovation: To continuously enhance the experience of our clients and audiences we must explore new ideas, new techniques and new technologies and challenge ourselves in pursuit of excellence.

And, after conversations with some of our DEI networks, we have also introduced another new value:

Respect: Because we respect each other, our clients, our suppliers, our audiences and our communities, we recognise that, in a truly diverse and inclusive business, we must always respect different opinions, perspectives and personalities. These values reflect who we are today, and will guide our future success.

5. Ethical business standards

5.1 Our commitment to diversity, equity and inclusion (DEI)

As a global business operating in diverse markets, Haymarket is inherently multicultural. We are committed to promoting diversity, equity and inclusion in all that we do. Haymarket is a place where people can be themselves; where everyone has the same opportunities, regardless of skin colour, religion, age, disability, sexual orientation or gender.

Globally we are committed to attracting, developing and retaining talent who reflect the communities we serve. We equally recognise our broader responsibility to society as a whole and proactively aim to use our power and influence to drive diversity, equality, and inclusion within our markets and communities. We partner with Vercida, a specialist in workplace diversity and inclusion.

Our four pillars of DEI are **Recruit, Support, Educate** and **Celebrate**.

These are reflected in our **five DEI networks**, who help Haymarket champion difference and serve to create an environment in which everyone can be their authentic self.

1. **Origin** network considers Haymarket's policies from the perspective of race, national origin, citizenship, religion and socioeconomic diversity
2. **Body & Mind** focuses on health, fitness, physical disability and mental health and is guided by our four DEI pillars
3. Our **Neurodiversity** group represents neurodiversity in all of its forms, and supports individuals, families, children, friends and colleagues living with Neurodiversity, including Dyslexia, ADHD, Autism, Dyscalculia, Dyspraxia and anxiety
4. **LGBTQ+** aims to work in tandem with Haymarket to create a safe, inclusive and equitable workplace for LGBTQ+ employees
5. Our **Balance** network meets regularly to discuss issues relating to gender equality, flexible and hybrid working and support for working parents and carers.

5.2 Our commitment to being a socially and environmentally responsible business

As we serve our audiences, clients and communities, we are committed to driving the meaningful change necessary to build a better world. integrity and respect are



at the heart of how we do business, as reflected in our values. Our approach is based on the three pillars of economic, environmental and social sustainability.

We have a global sustainability team that represents our various divisions and is used as a forum to set objectives and communications to our colleagues.

5.3 Our commitment to our community

Haymarket's UK charity partner is Skylarks, local to our Twickenham HQ.

Skylarks supports and provides services to children with additional needs, as well as offering a support network for the whole family too.

6. Conflicts of interest

a) A "conflict of interest" occurs when an individual's private interest, real or perceived, interferes with the interests of Haymarket Media Group. Conflicts of interest are prohibited as a matter of policy, unless they have been approved by the CEO, CFO or Director of People and Communications of Haymarket Media Group. Any worker who suspects that there may be a conflict of interest or is concerned that a conflict might develop should discuss the matter with their manager or People team promptly.

b) You must never use or attempt to use your position at Haymarket Media Group to obtain any improper personal benefit for yourself, your family, or any other person.

c) You must not permit any business decision, such as a decision as to whether Haymarket Media Group will do business with a client, producer, intermediary, prospect, counterparty or supplier to be influenced, or appear to be influenced, by interests unrelated to Haymarket Media Group. A decision to place Haymarket Media Group business with such entities and the volume of such business must be based solely upon business considerations.

d) You must not knowingly permit yourself to be placed in a position where your interests could become adverse to Haymarket Media Group's.

e) Any transactions involving Haymarket Media Group and a member of your immediate family (e.g. spouse, child, sibling, parent or in-law), or someone with whom you have a close personal relationship, must be brought to the attention of your manager to determine if the transaction poses a perceived, potential or actual conflict of interest.

f) Sometimes the line between personal and Haymarket benefits is difficult to draw, and sometimes there are both personal and Haymarket benefits in certain activities. In such circumstances, the only prudent course of conduct is to ensure that any use of the Haymarket's property or services that is not solely for the benefit of Haymarket Media Group is approved beforehand by your manager.

g) You are prohibited from managing a spouse/partner or other immediate family member into a role over which you will have direct line management responsibility.

6.1. Duty of loyalty



a) You must maintain the confidentiality of Haymarket Media Group's business information. This includes, but is not limited to, employee salary and benefits information, business plans and other proprietary information as outlined in the relevant policies and procedures relating to confidentiality, privacy and theft of trade secrets as outlined in this Code.

7. Anti-bribery and corruption

Haymarket Media Group is committed to carrying out business fairly, honestly and openly and adopts a zero tolerance approach towards bribery. Bribery is where a person offers, promises or gives another person an advantage - whether financial or otherwise (for example, providing cash, gifts, hospitality, entertainment) - intending that advantage to induce the person to perform a function or activity improperly, or as a reward for doing so. Bribery is a criminal offence which can lead to a significant fine and potentially a prison sentence. Requesting or agreeing to accept or receive a bribe is also a crime.

It makes no difference whether the advantage is provided to or received from public officials, private individuals or companies. Bribes taking place outside the UK are also against the law.

Facilitation payments, which are payments to induce officials to perform routine functions they are otherwise obligated to perform, are also against the law and prohibited. These do not include payments for legally required administration fees or fast-track services. It is also a crime to offer, promise or give a financial or other advantage to a foreign public official with the intention of influencing the official in the performance of his or her official functions, if the person doing so intends to obtain or retain business or an advantage in the conduct of business by doing so.

Therefore, you must not offer, give or receive bribes or make or accept improper payments (including facilitation payments) to obtain new business, retain existing business, or secure any improper advantage, and you must not permit others to do such things in Haymarket's name.

Haymarket Media Group considers such conduct amounts to gross misconduct, and any bribery or other breaches of this policy may result in disciplinary action, leading to your dismissal without notice. You will also be reported to the police and could face prosecution in the event of a suspected case of a criminal offence.

7.1 Hospitality, gifts and entertainment

Any bonafide business expenditure on hospitality or promotional activity, provided it is *reasonable and proportionate*, is permissible under anti-bribery legislation. However, such expenditure can be deemed to be bribery if the intention of offering such hospitality is to induce the recipient to improperly perform their role and secure a business advantage for Haymarket. Thus Haymarket Media Group operates a strict policy and procedure which governs our corporate hospitality, promotional activity and other similar business expenditure.

The hospitality offered by, or to, Haymarket Media Group workers must meet the following criteria:



- a) The purpose of Haymarket Media Group providing the hospitality or promotional activity is to improve the image of our organisation, to better present products and services and/or establish cordial business relations.
- b) Any such expenditure must be **appropriate** and **proportionate** and have a specific business purpose, i.e. to improve the image of our organisation, to better present products and services and/or establish cordial business relations.
- c) The recipient of Haymarket Media Group's hospitality should not be given the impression that they are under an obligation to confer any business advantage.
- e) Invitations for excessive or extravagant entertainment or invitations for entertainment not in good taste and/or without a specific business purpose must be declined.

7.2 Gifts

The giving or receipt of gifts is not prohibited, if the following requirements are met:

- a) It is not made with the intention of influencing a third party to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favours or benefits;
- b) It complies with local law;
- c) It is given in Haymarket's name and not in your name;
- d) It does not include cash or a cash equivalent (such as gift certificates or vouchers);
- e) It is appropriate in the circumstances. For example, in the UK it is customary for small gifts to be given at Christmas time;
- f) Taking into account the reason for the gift, it is of an appropriate type and value and given at an appropriate time;
- g) It is given openly, not secretly;
- h) Gifts have not been accepted from the same source on a regular basis; and
- i) Gifts should not be offered to, or accepted from, government officials or representatives, or politicians or political parties, without the prior approval of your Managing Director.

The process to log gifts is as follows:

- Entertainment and gifts can be accepted/given, but must follow the guidance set out in the CoC. All expenditure given or received should be **appropriate and proportionate**.
- All hospitality received over £100 must be reported in writing to your line manager and HR (by email: HR@haymarket.com) **prior to acceptance**.



- Any gifts with a value over £50 must be reported in writing to your line manager and HR (emailed to: HR@haymarket.com).
- No gifts should be cash or cash equivalents (including gift certificates or vouchers).

Any entertainment/gift that is not considered to be appropriate or proportionate will need to be rejected.

We appreciate that the practice of giving business gifts varies between countries and regions and what may be normal and acceptable in one region may not be in another. The test to be applied is whether in all the circumstances the gift or hospitality is reasonable and justifiable. **The intention behind the gift should always be considered.**

7.3 Donations

Haymarket Media Group only makes charitable donations that are legal and ethical under local laws and practices. No donation must be offered or made without the prior approval of the Director, People and Communications.

7.4 Risk assessments and due diligence

The risk of bribery associated with any business venture or entering into a specific business relationship will depend on a series of factors. It is the responsibility of senior managers leading the project, tender process or managing the relationship to assess the risks of bribery and to mitigate such risks. Haymarket Media Group is committed to carrying out risk-based due diligence on any third parties contracted to provide services for or on behalf of Haymarket Media Group. Anti-bribery terms and conditions are a necessity to entering into any such contractual agreements.

7.5 Reporting and whistleblowing

If you believe you are being offered a bribe, or have reason to suspect that another person associated with Haymarket Media Group has offered or is being offered a bribe, you must immediately report this to the Managing Director and Director, people and communications. Similarly, if you believe you have been asked to pay a facilitation payment, or have reason to suspect that another person associated with Haymarket Media Group has been asked to pay a facilitation payment, you must immediately report this to your divisional Managing Director and/or Director, People and Communications. Haymarket Media Group's [Whistleblowing policy](#) sets out the procedure to be followed.

Haymarket Media Group will not tolerate harassment or victimisation against anyone who raises a concern in good faith. Haymarket Media Group will do its best to protect an individual's identity when such a concern is raised. It must be appreciated that the investigation process may reveal the source of the information and a statement by the individual may be required as part of the evidence; this is to protect against vexatious claims.

8. Outside business activities

a) You must obtain written approval from the CEO, CFO, Chairman, Director of People and Communications or the divisional MD before accepting outside employment or



serving as a director, trustee, officer, owner, partner or consultant of a for-profit organisation, regardless of whether compensation of any form is received.

b) Those desiring to serve as a director, trustee, officer, owner, partner or consultant of a non-profit organisation as a volunteer and without compensation and outside working hours (for example, on the board of a school or social organisation), need not obtain prior approval if there is no actual, potential or perceived conflict of interest. If an actual, potential or perceived conflict of interest does arise, workers must avoid even the appearance of impropriety in association with their conduct. All conflicts of interest should be disclosed to the Director, People and Communications

9. Communicating with regulators and others

a) Requests from regulators or auditors for information should be answered with complete, factual and accurate information. During an inspection, examination or audit, you must not conceal, destroy or alter any documents, lie or make any misleading statements to any regulatory agency representative or auditor.

b) You must refer other external requests for information (other than information already published by Haymarket Media Group) to the Director, People and Communications for approval for release.

c) Full, fair, accurate, timely and understandable disclosure must be made in reports and documents that Haymarket files with, or submits to the UK Government, Inland Revenue and in any public communications made by Haymarket Media Group.

d) You must not, and must not direct any other person to, take any action to fraudulently influence, coerce, manipulate or mislead any independent public or certified accountant engaged in the performance of an audit of the financial statements of Haymarket or any of its subsidiaries, for the purpose of rendering those financial statements materially misleading.

10. Employee use of Haymarket's IT systems and technology

When using Haymarket Media Group's computers and computer networks, computer-processed information, and electronic communications systems, workers are required to exercise the highest standards of corporate and social behaviour in all of their usage, language and communications; this includes, all social media channels.

10.1 Social media

Social media plays a critical role in our business and your personal brand image is key to that. Your expert opinions, views and commentary are widely respected by our clients, audiences and colleagues globally. While we empower employees to be their authentic selves, remember that your views are also a reflection of Haymarket. It is reasonable for external sources to assume the views presented by any employee also represent our company beliefs and values.

Please see separate IT Policy and Social Media Guidance published on the Link.



11. Business information

11.1 Accurate records

a) Business records must always be prepared with accuracy and reliability. The details of Haymarket Media Group's relationships and transactions with those with whom it does business must be accurately entered in its records and on computer systems such as the Finance and HR systems and FutureProof.

b) You must not alter or falsify information on any record or document.

c) Compliance with generally accepted business principles and controls is expected at all times.

11.2 Confidentiality and privacy

a) You must comply with applicable privacy laws, UK company policies related to securing and sharing confidential information, as well as any relevant provisions in your contract of employment or engagement with Haymarket Media Group.

b) Clients and business associates trust us with their confidential information. All such information concerning these third parties and their businesses and transactions, must be treated as confidential and must be confined, even within Haymarket Media Group, only to those who must have such information in order for Haymarket Media Group to carry out its engagement or perform its business properly and effectively.

11.3 Confidentiality and trade secrets

a) Trade secrets developed by Haymarket Media Group for use in its business are to be kept confidential. Accordingly, you must exercise discretion in using, discussing or otherwise transferring information regarding Haymarket Media Group's business.

b) Haymarket Media Group condemns the practice of improperly obtaining, disclosing or using the trade secrets of others.

c) You must not disclose to any non-Haymarket Media Group worker who is not authorised to receive such information, any of confidential or proprietary information or trade secrets whether in written, electronic or verbal form.

d) In the event that you leave Haymarket Media Group, you must not use or disclose to any non-Haymarket Media Group worker any of Haymarket's Media Group's confidential or proprietary information or trade secrets whether in written, electronic or verbal form.

11.4 Intellectual property

a) Haymarket Media Group is committed to protecting its intellectual property rights such as filing applications to register patents, trademarks and copyrights. Intellectual property developed or otherwise acquired by workers during their



employment and which is related to Haymarket Media Group's business is the property of Haymarket Media Group.

b) You are obligated to promptly notify your manager when any intellectual property is developed or acquired and to cooperate with Haymarket Media Group in its efforts to secure intellectual property rights.

c) You must not improperly disclose or use Haymarket Media Group's intellectual property either during or after employment with Haymarket Media Group unless proper authorisation is received.

e) You may not use intellectual property obtained in the course of your employment with another company without first obtaining permission from the other company.

f) If you are approached with any offer of confidential information that may have been obtained improperly, you must immediately discuss this matter with your divisional MD

g) Haymarket Media Group respects the limitations placed upon software by the manufacturer. Workers are therefore not permitted to use or copy software or documentation except as specified in the licensing agreement or for a fair use of the functional elements of a software program to which copyright protection does not apply.

12. Procurement and third parties

12.1 Agents/consultants and third parties

a) Haymarket Media Group workers must exercise appropriate business judgement when selecting a third party to represent Haymarket and ensure appropriate levels of due diligence are performed such as ensuring the contract sufficiently protects us from high levels of risk. The purchase of any goods and services must follow Haymarket Media Group's [Procurement Policy](#), which can be found on the Link.

b) Haymarket Media Group workers cannot use agents, consultants, independent contractors or other representatives to do indirectly that which a Haymarket Media Group worker could not do directly under this policy or applicable law and regulation.

c) Haymarket Media Group workers must be careful to ensure that clients, producers, agents or suppliers do not exploit their relationship with Haymarket Media Group and that such persons do not use Haymarket Media Group's name in connection with any fraudulent, unethical or dishonest transactions.

13. Failure to follow policy

13.1 Enforcement/penalties

a) Any worker who compromises or violates the high ethical standards contained in this policy will be subject to disciplinary action up to and including



dismissal/termination (and loss of any employment-related benefits) and if applicable, to criminal or civil proceedings.

b) Haymarket Media Group intends to enforce the provisions of this policy in a consistent manner, regardless of the status of the Haymarket Media Group employee. Enforcement by Haymarket Media Group shall commence promptly following notice to Haymarket of any breach or alleged breach of this policy. The Managing Director shall be responsible for applying the provisions of this policy to situations that breach or potentially breach these guidelines.

c) To determine whether a breach of this policy has occurred, an initial investigation will be made by or under the direction of the HR Director. If deemed necessary, the investigating manager shall conduct interviews with all workers possessing relevant information and shall then present his or her findings in writing to the Managing Director, for its consideration.

d) Examples of conduct that may result in discipline include actions that breach an Haymarket Media Group policy; requesting others to breach a policy; failure to report a known or suspected breach of a policy; or retaliation against any employee for reporting a policy breach.

e) In all cases it is the sole judgement of Haymarket Media Group as to whether a particular action breaches this policy.

13.2 Waivers

From time to time, Haymarket Media Group may waive some provisions of this policy. A worker who believes that a waiver may be called for should contact the Director of People and Communications in the first instance.

13.3 Reporting concerns

This section should be read in conjunction with Haymarket's [Whistleblowing policy](#), which is available on the People Portal.

Workers must report to their Director any problems or concerns or any potential or actual violation of laws, rules, regulations or this policy. The responsibility to report any questionable behaviour to their Director is a clear and objective requirement. Failure to do so is itself a breach of this policy.

A worker who is aware of any questionable behaviour should discuss the situation with his or her line manager or divisional MD to prevent possible misunderstandings and embarrassment at a later date. A worker who is unsure of whether a situation breaches this policy should discuss the situation with their People Partner in the People team.

Workers with questions about this policy or requests for copies of the policy should direct their enquiries to the People Team (HR@haymarket.com).



Haymarket's Social Media Guidelines

It is easy for our work and personal lives to become interconnected online.

Social media plays a critical role in our business and your personal brand image is key to that. Your expert opinions, views and commentary are widely respected by our clients, audiences and colleagues globally. While we empower employees to be their authentic selves, remember that your views are also a reflection of Haymarket. It is reasonable for external sources to assume the views presented by any employee also represent our company beliefs and values.

The following guidance outlines what we expect as standard protocol and etiquette by everyone at Haymarket, as well as highlighting legal and compliance issues we must all be mindful of regarding our personal social media accounts.

While the main focus is the creation and publication of social media content, it also refers to any activity and interaction on social media, including comments on other people's posts, 'liking' content and retweets. This applies to everyone at Haymarket Media Group.

If you're not sure, don't post it

Do not share information that is not in the public domain or already on any social channels. You must have permission before publishing or reporting on conversations that are private or internal to the business. Equally, third party content should not be reproduced without first securing the relevant permissions, as this may constitute copyright or trade mark infringement

If you are unsure about posting content, ask communications@haymarket.com or speak to your line manager.

Have an opinion, but be accountable

While you speak for yourself, you are also representing Haymarket. Before posting anything online, be sure to consider if it is something you would want colleagues, your manager, clients, stakeholders and the wider public to read. By all means have an opinion, but don't write anything on social that you wouldn't be allowed legally to publish on your brand's website or in its magazine. You can be sued for online defamation, breach of data protection, misuse of private information and/or breach of confidence. This potentially includes sharing/retweeting defamatory content, even if you are not the author.

Live our values

We are a creative, innovative group of experts and our public profile should always keep [our commitment](#) to diversity, equity and inclusion front of mind. We are a company built on respect and integrity and we expect our colleagues to act accordingly. Any post you make on social media should reflect this.



In line with living our values, avoid behaviours which may be lawful but could be offensive or hurtful to others, including 'pile-ons', harassing conduct, and other activities which would be deemed as a breach of community guidelines in the terms and conditions on various social media platforms.

Keep your profile transparent

We love our people being proud to work here and championing Haymarket, but be clear who you are and who your views represent. If you are not an official Haymarket spokesperson (someone responsible for running our corporate social media accounts or associated brands) do not claim to represent the company. If your profile associates you with working at Haymarket, add a disclaimer such as 'views are my own'. However, this holds no legal weight for the employee and does not mean you are free to post potentially offensive or inaccurate content.

Remember it's public

Think about how a comment could be construed (or mis-construed) before hitting 'publish'. Nuance is difficult to articulate online, so even if something isn't meant in a certain way, it can still offend. Resist the urge to post anything on social media when something has made you angry or you have been drinking as it's always best to post with a clear head. Assume everything you post on any of your social media platforms can be seen by anyone. If that makes you uncomfortable, don't share it.

Speak the truth

Never represent yourself or Haymarket in a false or misleading way. All statements must be true to the best of your knowledge and belief and all claims must be substantiated. In order to ensure what you post is suitably accurate, it needs to be checked elsewhere. This is usually easy to do either from an authoritative source, by checking with your team or using the social platform to send out a call for confirmation.

Haymarket reserves the right to request the removal of any social media posts which are deemed to constitute a breach of these standards.

Our behaviour and the impact we have on our colleagues, clients and audience is key to our success and our reputation. Haymarket's core values underpin everything we do and it is important that our behaviours reflect those values. You can read Haymarket's Dignity at Work policy [here](#).

If any employee is found to be in breach of these guidelines, it may be necessary to invoke the Company's Disciplinary policy.

Anti Bribery and Corruption Policy

UK Company Policy

Purpose

Haymarket Media Group has a zero tolerance approach to bribery and corruption. The purpose of this policy is to convey to all employees and interested parties of Haymarket Media Group the rules in relation to our unequivocal stance towards the eradication of bribery and our commitment to ensuring that Haymarket Media Group conducts its business in a fair, professional and legal manner.

It is a criminal offence to:

- offer a bribe;
- accept a bribe;
- bribe a foreign official; and
- as a commercial organisation, to fail to prevent a bribe.

Scope

This policy applies to all employees of Haymarket Media Group, including agency workers, casual employees and freelancers. We also expect the application of this policy where our business involves the use of third parties, including but not limited to suppliers and contractors.

Policy Statement

It is prohibited, directly or indirectly, to offer, give, request or accept any bribe, including but not limited to: gifts, loans, payments, rewards or advantages, either in cash or any other form of inducement, to or from any person or company in order to gain commercial, contractual or regulatory advantage for Haymarket Media Group, or in order to gain any personal advantage for an individual or anyone connected with the individual in a way that is unethical.

It is also prohibited to act in the above manner in order to influence an individual in their capacity as either a domestic or foreign public official.

If you are offered a bribe, or a bribe is solicited from you, you should not agree to it unless your immediate safety is in jeopardy. You should immediately contact the **Director of People & Communications, or HR Dept.** so that action can be taken if considered necessary. You may be asked to give a written account of events.

If you, as an employee or person working on our behalf, suspect that an act of bribery, or attempted bribery, has taken place, even if you are not personally involved, you are required to report this to the **Director of People & Communications.** You may be asked to give a written account of events.

Appropriate checks will be made before engaging with suppliers or other third parties of any kind to reduce the risk of our business partners breaching our anti bribery rules. Haymarket Media Group will ensure that all of its transactions, including any sponsorship or donations given to charity, are made transparently and legitimately.

Definitions

- 'Corruption' - means the misuse of office or power for private gain.
- 'Bribery' - is a form of corruption which means in the course of business giving or receiving money, gifts, meals, entertainment or anything else of value as an inducement to a person to do something which is dishonest or illegal.

Hospitality, gifts and entertainment

Any bonafide business expenditure on hospitality or promotional activity, provided it is reasonable and proportionate, is permissible under anti-bribery legislation. However, such expenditure can be deemed to be bribery if the intention of offering such hospitality is to induce the recipient to improperly perform their role and secure a business advantage for Haymarket Media Group. Thus Haymarket Media Group operates a strict policy and procedure which governs our corporate hospitality, promotional activity and other similar business expenditure.

The hospitality offered by, or to, Haymarket Media Group workers **must meet the following criteria:**

- a) The purpose of Haymarket Media Group providing the hospitality or promotional activity is to improve the image of our organisation, to better present products and services and/or establish cordial business relations;
- b) Any such expenditure must be appropriate and proportionate and have a specific business purpose, e.g. to improve the image of our organisation, to better present products and services and/or establish cordial business relations;
- c) The recipient of Haymarket Media Group's hospitality should not be given the impression that they are under an obligation to confer any business advantage; and
- e) Invitations for excessive or extravagant entertainment or invitations for entertainment not in good taste and/or without a specific business purpose must be declined.

The giving or receipt of gifts is not prohibited, **if the following requirements are met:**

- a) It is not made with the intention of influencing a third party to obtain or retain business or a business advantage, or to reward the provision or retention of business or a business advantage, or in explicit or implicit exchange for favours or benefits;
- b) It complies with local law;
- c) It is given in Haymarket Media Group's name and not in your name;
- d) It does not include cash or a cash equivalent (such as gift certificates or vouchers);
- e) It is appropriate in the circumstances. For example, in the UK it is customary for small gifts to be given at Christmas time;
- f) Taking into account the reason for the gift, it is of an appropriate type and value and given at an appropriate time;
- g) It is given openly, not secretly;
- h) Gifts have not been accepted from the same source on a regular basis; and
- i) Gifts should not be offered to, or accepted from, government officials or representatives, or politicians or political parties, without the prior approval of your Managing Director.

Any entertainment/gift that is not considered to be appropriate or proportionate must be rejected.

We appreciate that the practice of giving business gifts varies between countries and regions and what may be normal and acceptable in one region may not be in another. The test to be applied is whether in all the circumstances the gift or hospitality is reasonable and justifiable. The intention behind the gift should always be considered.

Supply chain risks and processes

- All suppliers that are used more than once, or with whom expenditure is greater than £1,000 must be registered as a supplier on Business World;
- All contracts should be documented and processed in the same way as any sale or purchase where cash is involved;
- Suppliers that register will be asked to provide company details so we can confirm they are a legitimate businesses;
- Only suppliers will have access to amend their financial information on the Supplier Information Management system (SIM);
- Buyers must put in place contracts for all suppliers with a spend value greater than £10,000 in aggregate;

- Suppliers will be asked: 'Do you have any immediate or close family relations, employees, business partners, or entities with a shareholding in your company that currently work for Haymarket on either a permanent or freelance basis?' Where the answer is yes the procurement department will contact the supplier and the buyer;
- If any employees have a conflict of interest they must report this to the **Director of People & Communications** prior to engaging the supplier;
- All purchase orders contain a Supplier Code of Conduct that states that Haymarket Media Group expects all our suppliers to adhere to relevant legislation and that inappropriate gifts will be returned and only modest hospitality should be offered; and
- Buyers should be aware of suppliers that request the following, and report any concerns to the Procurement Department:
 - Requesting payment only for 'facilitating' services
 - Abnormally high fees or commission
 - An insistence on urgency or confidentiality
 - Requesting payment in advance or cash payments
 - Requesting payment via third parties

Internal processes

- Haymarket Media Group operates an approval process for all committed spend. A requisition that contains the services or goods to be procured must be raised on Business World and provided to the supplier prior to the services being delivered;
- Haymarket Media Group will run periodic corruption and bribery risk assessments to identify potential risks, rate the likely occurrence and potential impacts, select the appropriate anti-corruption controls, and develop and record an action plan;
- All employees must adhere to Haymarket's Travel and Expenses policy when incurring travel and associated expenditure on behalf of Haymarket Media Group. All expense claims must be processed via Business World. Any incomplete claim or one that contravenes the policy, will be rejected.

Commitments and objectives

- We will only work with suppliers that comply with anti bribery and corruption laws and regulations. Our objective is 100% compliance;
All suppliers that are used more than once, or with whom expenditure is greater than £1,000 must be registered as a supplier on Business World. Any exceptions to be notified and confirmed by accounts payable and procurement;
- Our Supplier Code of Conduct is distributed with purchase orders to all suppliers. All suppliers that register with us must confirm that they have read and understood the contents of the Code. Our objective is 100% compliance;
- All employees must comply with all aspects of this policy. Our objective is 100% compliance;
- All conflicts of interest must be raised with the **Director of People & Communications**. Our objective is 100% compliance; and
- All gifts and hospitality given and received must comply with this policy. Our objective is 100% compliance.

Responsibilities

- The Anti Bribery & Corruption Policy is owned by the Chief Financial Officer and Director of People & Communications
The responsibility for understanding corruption and bribery risks and putting in place processes and training lies with our Chief Financial Officer, Director of People & Communications, UK Financial Controller, and Head of Procurement
- The responsibility for employee policies and processes lies with the Director of People & Communications
- The prevention, detection and reporting of bribery and corruption in any part of our operations and supply chain is the responsibility of all employees. Employees must not

engage in, facilitate or fail to report any activity that may lead to, or suggest, a breach of this policy. Department heads and line managers are responsible for checking processes are followed and that non compliance is raised.

Policy breaches

- Any supplier who is found in breach of the ethical standards set out in this policy, will be subject to disciplinary action up to and including termination of contract.
- To determine whether a breach of this policy by a supplier has occurred, an initial investigation will be made by or under the direction of the **Head of Procurement**.
- Any employee who is found in breach of the policy, will be subject to disciplinary action up to and including dismissal/termination (and loss of any employment-related benefits) and if applicable, to criminal or civil proceedings.
- Haymarket Media Group intends to enforce the provisions of this policy in a consistent manner, regardless of status. Enforcement by Haymarket Media Group shall commence promptly following notice of any breach or alleged breach of this policy.
- To determine whether a breach of this policy by an employee, or casual worker has occurred, an initial investigation will be made by or under the direction of the Director, People & Communications.
- Examples of employee conduct that may result in discipline include taking a bribe, giving a bribe, not reporting a bribe, failure to register gifts or hospitality, continuing to work with a supplier knowing that this is in breach of this policy, or failure to report any knowledge of a breach of this policy.
- In all cases it is the sole judgement of Haymarket Media Group as to whether a particular action breaches this policy.

Reporting

- We will continually review compliance, outcomes and objectives and take action to meet objectives as necessary; and
- We will report to relevant parties on any instances as required by law, regulation and any contractual obligations we may have with our clients.