

HUNTSWORTH

Code of Ethics Policy

Huntsworth plc

HUNTSWORTH PLC CODE OF ETHICS

Huntsworth plc and its subsidiaries (collectively the “Group”) operate an international public relations and healthcare communications group. We believe that the honesty, integrity and ethical behaviour of all our employees is fundamental to the reputation and success of the Group as a whole.

This Code is intended to promote a heightened awareness of ethical considerations and individual responsibilities relating to all of the Group’s activities. In the conduct of its business, the Group is guided by certain fundamental and enduring values, including acting with integrity at all times, complying with the regulatory framework wherever it operates, and meeting the standards of good corporate governance. In pursuit of these values, you are expected to make a personal commitment to uphold the Group’s reputation for honesty, integrity and ethical conduct. The following principles (as set out below and in the Appendix) and responsibilities should be reflected in your business conduct.

Details of the Code

To the best of your knowledge, and to the extent that you are reasonably able to do so, you must at all times in carrying out your duties and responsibilities:

- Act with honesty and integrity, and handle ethically any actual or apparent conflicts of interest between personal and professional relationships;
- Avoid making any personal profit from the Group’s business;
- Ensure that entries in any public filings or communications relating to the Group are, to the best of your knowledge, full, fair, timely, accurate and understandable in all material respects. You shall promptly bring to the attention of the Company Secretary any material information, of which you may become aware, that affects information disclosed in any such public filings or announcements;
- Proactively promote ethical and honest behaviour within the Group and adhere to the Group’s equal opportunities policy;
- Comply, and to cause the Group to comply, with all applicable governmental laws, rules and regulations. You should report to the Company Secretary any information of which you have become aware that has led you to believe that the Group has failed to comply with any applicable governmental law, rule or regulation;
- Diligently guard confidential information and take such steps as are reasonably necessary to prevent its disclosure;
- Protect and safeguard the Group’s name and reputation from any potential misuse;
- Maintain the confidentiality of all confidential information. You should not use any confidential information for your personal advantage; and
- Report promptly to the Company Secretary at Huntsworth plc any information of which you have become aware that has led you to believe that a violation of this Code has occurred or reasonably could be expected to occur.

Compliance with the Code

All employees are expected to adhere to this Code at all times. Any breach of this Code of conduct will be regarded as a serious disciplinary matter, resulting in appropriate sanctions, which may include summary dismissal.

APPENDIX

1. Outside Interests
You should avoid personal and professional activities, interests and associations that might interfere, or even appear to interfere, with your ability to make decisions in the best interests of clients and the Group.
2. Gifts
The giving or receiving of business gifts should remain appropriate to the business and should be modest.
3. Secret profits
You may not make any personal profit from the Group's business. You should not enter into any transaction on behalf of a member of the Group in which you have a financial interest (e.g. as a shareholder or relation of the other contracting party) without obtaining the prior written consent of Huntsworth plc.
4. Confidential Information
It is important that confidential information remains confidential in order both to preserve its value to the Group and to maintain the Group's reputation for integrity. Accordingly you may not during the course of your employment or following its termination, without obtaining the prior written consent of Huntsworth plc, divulge to any person any information of a confidential or secret nature concerning the business, finance, affairs or employees of any member of the Group other than for the enhancement of the Group's business.

You are not permitted to benefit personally from advance knowledge of any such confidential or secret information relating to any area in which a member of the Group is involved and you must not disclose such information to others - not even to relatives, friends or select clients.
5. Insider Dealing
Where you are aware of material, non public, price sensitive information, commonly known as "insider information" which if made public, could affect Huntsworth plc's share price you are prohibited from engaging in any of the following activities in respect of Huntsworth plc's shares:
(i) effecting transactions yourself or on behalf of a friend, relative or associate;
(ii) recommending or influencing others to deal in Huntsworth's shares;
(iii) disclosing such information to third parties.
6. Outside Business Activity
You are reminded that you may not engage in outside business activities without Huntsworth's prior written consent. If such consent is given then your conduct of outside business activities must be sensitive to concerns of divided loyalties. "Outside activity" may consist of a financial interest in another business or an executive position in a family owned business.
7. Protecting the Group's Name
You should at all times be aware that the name and reputation of each member of the Group are valuable assets and must be safeguarded from any potential misuse. Care must be exercised to avoid the unauthorised use of the name of any member of the Group in any manner that can be misinterpreted to indicate a tie in between that member and any other entity or activity.
8. Relationships with Employees
The Group expects and demands the same high standards of integrity, fair play and responsibility in dealing with its employees as in dealing with its clients and the public. This general principle is demonstrated, for example, by our equal opportunities policy.
9. Equal Opportunities
The Group is committed to the principle of equal opportunity in employment.
The Group's policies on recruitment, selection, training, development and promotion will be operated to ensure that no job applicant or employee receives less favourable treatment on the grounds of race, colour, nationality, ethnic origin, sex, marital status, age, religion or belief, sexual orientation or disability (subject to the provisions of applicable legislation). The objective of the Equal Opportunities Policy is to

ensure that individuals are selected, promoted and otherwise treated solely on the basis of their relevant aptitudes, skills and abilities.

Everybody in the Group, whether in a supervisory capacity or otherwise, is expected and required to adhere to this policy in respect of their fellow employees and, in addition, are required to treat all members of the public equally.

10. Grievance and Disciplinary Procedures

If any person has a complaint concerning discrimination, victimisation or harassment he or she should follow the grievance procedure set out in their contract of employment. All such complaints will be treated seriously and each complaint will be investigated fully. If appropriate, disciplinary action (which could include dismissal) will be taken in accordance with the appropriate disciplinary procedures.

11. Relationships with Customers and Suppliers

As noted earlier you may regularly see confidential information from customers and suppliers as part of your normal business relationship. You must at all times respect the absolute confidence of such information and should discuss it only with those colleagues who have a need to know such information.

12. Legal Compliance

It is the Group's policy to comply with all applicable laws, rules and regulations. It is your responsibility to ensure that you adhere to applicable standards and restrictions including those relating to auditing and accounting matters.

13. Drugs and Alcohol

You may not attend work whilst under the influence of alcohol, illegal drugs or other substances, nor may you become under the influence of any such substance at any time whilst engaged on the Group's business.

Further, you may not, whilst at work or otherwise engaged on the Group's business possess, use, supply or attempt to supply illegal drugs.

14. Internet Usage

You must not, whilst at work or at any other time whilst engaged on the Group's business access internet sites containing pornographic, offensive or obscene material.

15. Risks of Non-Compliance with this Code of Ethics

You are expected to conform to the legal and ethical guidelines identified above. If you ignore these guidelines and prohibitions you may not only injure yourself but may also harm the Group's reputation and expose it to monetary damages.

You should be aware that it is the Group's policy to be vigilant in detecting improper behaviour by its employees and that the Group will, if appropriate, make prompt disclosure of any such conduct to the relevant authorities. Moreover, any breach of this code of conduct will be regarded as a serious disciplinary matter, resulting in appropriate sanctions, which may include summary dismissal.

16. Conclusion

Every business situation which presents an ethical or legal dilemma cannot be anticipated or addressed in a document such as this. In preparing this code the Group has attempted to highlight certain areas that typically pose ethical concerns. Where you are in any doubt as to the propriety of certain conduct or the prior written consent of your employer or another member of the Group is required for such conduct you are encouraged to seek the advice of the Chairman or senior independent non-executive director before undertaking such conduct.