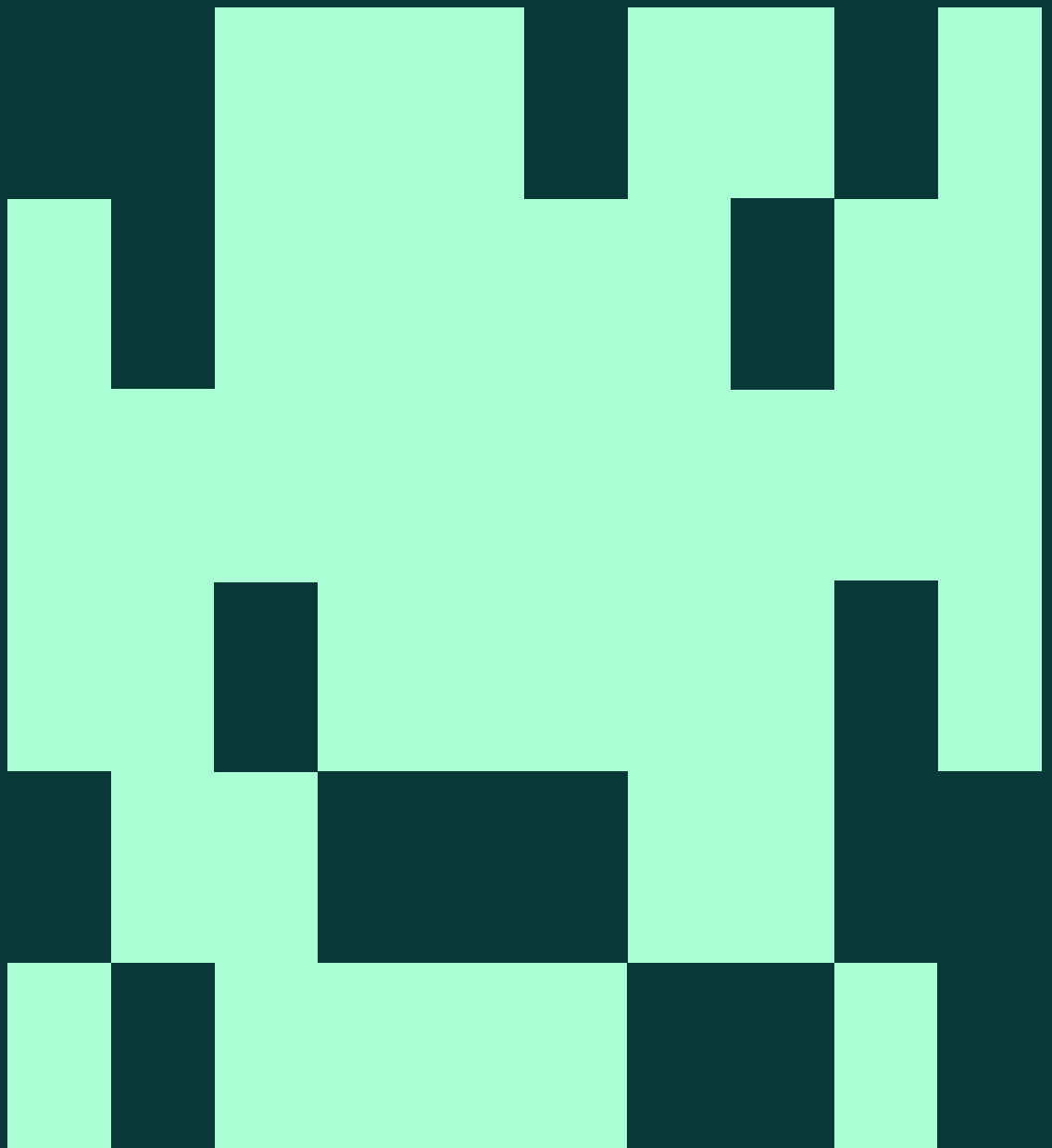


MAPP

# Our Code of Ethical Conduct





MAPP is radically reimagining how commercial property is managed.

This involves creating inviting places where businesses and people can really thrive, helping clients deliver their objectives, protecting our planet and generating employment opportunities for people from all walks of life.



**4 Introduction**

- 5 Why do we have a Code of Ethical Conduct?
- 7 Our code applies to everyone
- 7 Open door policy and expectations for Managers
- 8 Raising questions

**9 Our responsibilities to the MAPP team and to each other**

- 13 Equal Opportunities and Diversity
- 14 Anti-Harassment
- 14 Health and Safety
- 15 Positive Mental Health and Wellbeing
- 16 Flexible Working
- 17 Training and Development
- 18 Behaviour at work
- 18 Alcohol & Drug Misuse
- 19 Privacy and personal data protection
- 19 IT use and security
- 19 Privacy
- 20 Business Continuity
- 20 Communications Resources
- 21 Internet and Social Media usage
- 22 Records and Information Management

**23 Our responsibilities to our clients and occupiers**

- 26 Quality assurance
- 26 Conflicts of Interest
- 27 Anti-Bribery and Corruption
- 28 Fraud Policy
- 28 Anti-facilitation of Tax Evasion Policy
- 28 Anti-money laundering policy
- 29 Complying with Modern Slavery Laws

**30 Our approach to sustainability**

- 31 Our Responsibility to the Environment
- 33 Social Value
- 34 Staff Volunteering
- 35 Political contributions
- 35 Charitable donations, and sponsorships
- 35 Supply Chain Partners

**36 Reporting and Corporate Governance**

- 37 Corporate Governance
- 39 Communications policy
- 39 Whistleblower Reporting
- 40 Contact information

# Our responsibilities to the MAPP team and to each other



## Why do we have a code of ethical conduct?

MAPP is proud to have taken the decision in 2019 to amend its legal constitution to make it a requirement to consider all stakeholders as part of its decision-making.





**Alongside shareholder return our formal objects include giving meaningful consideration to:**

- Making a material positive impact on society and the environment through our business and operations
- The interests of the Company's employees.
- The need to foster the Company's business relationships with suppliers, customers and others.
- The impact of the Company's operations on the community and the environment and on affected stakeholders.
- The desirability of the Company maintaining a reputation for high standards of business conduct and the impact this has on affected stakeholders.
- The likely consequences of any decision of the directors in the long term and the impact any such decision may have on any affected stakeholders.

This code of ethical conduct incorporates many of the practical aspects of living these obligations out and exists to ensure you understand your ethical responsibilities and the information you need to guide your decision making.

Inevitably it cannot cover all the scenarios you will be faced with, but hopefully it gives you enough information for you to act wisely most of the time, knowing that when you are in doubt you must always consult with your line manager or Director.

## Our Code applies to everyone at MAPP

This Code contains important rules and guidelines that apply equally to everyone at MAPP, regardless of role or seniority.

We also expect our clients, contractors and suppliers to follow similar principles.

Throughout the Code, there are references to policies, procedures and training resources that are available via hyperlink, Beekeeper or Litmos.

Throughout this Code, all references to “manager” refer to anyone who has direct reports.



## Open Door Policy and Expectations for Managers

In addition to the standards set out for everyone in our Code, managers are expected to demonstrate their personal commitment to it by fostering an environment that promotes compliance with our Code. Consequently Managers at all levels should:

- Lead by example and ensure all employees are aware of and abide by this Code, other MAPP policies and procedures, and applicable laws and regulations.
- Have an “open door” approach where team members feel comfortable asking questions or raising concerns.
- Promptly escalate any known or potential violations of our Code or policies.
- Ensure that all employees are treated fairly, and take individual needs and concerns into consideration.

Managers must also make sure that anyone who chooses to voice their opinion or report a concern are informed of MAPP’s non-retaliation policy.

## Raising questions

### Why is it important to speak up?

We believe that asking questions and reporting potential problems benefit all of us. Consequently, we take all reports very seriously. You are encouraged to raise your concerns even if you are not positive that anything improper has occurred. Since our Code cannot possibly address every situation that might arise in our day-to-day duties, it is up to each of us to use good judgment and common sense in our efforts to solve problems and resolve misunderstandings.

### Good faith reporting and non-retaliation

You are always encouraged to discuss problems, ideas or questions with a manager or another individual with whom you feel comfortable, without fear of retaliation or impact on your employment. Because retaliatory conduct hurts our ability to work as a team, MAPP does not allow any form of retaliation against any person who has reported a possible violation in good faith. "Good faith" essentially means that you come forward in a timely manner with all the information you have and provide a sincere and complete report.

### Whom should I contact?

MAPP encourages you to direct questions or concerns to your manager whenever you feel comfortable doing so. In cases where this feels inappropriate then you can turn to:

- The Director of your team /business area
- A member of the Executive Management Board
- The MAPP People Team

When making a report, please be open and honest and provide as much information as you can in order to facilitate follow-up. When you report an issue, MAPP will promptly investigate the report in a fair, consistent and expeditious manner. The investigation, including any interviews, will be conducted in such a way as to maintain confidentiality to the extent possible. Depending on the circumstances, you may be provided with follow-up communication upon conclusion of the investigation.

A violation of our Code, policies or the law may carry serious consequences for the individuals involved and for MAPP as a whole. MAPP will take appropriate action in response to conduct that violates our Code or underlying policies in accordance with our disciplinary policy.

In keeping with the importance we place on compliance with our Code, every year during performance reviews, we require you to certify that you have read it and are committed to upholding it.

You must ensure that the vendors, consultants and other agents you engage to represent or provide services to or for MAPP, or for the benefit of our clients, comply with the separate requirements in the MAPP Procurement Policy.

[For more detail please read the full Procurement Policy here](#)



Our responsibilities  
to the MAPP team  
and to each other



Making MAPP a Great Place to Work has been at the heart of our three main company objectives for many years and we are determined to keep building on that reality.

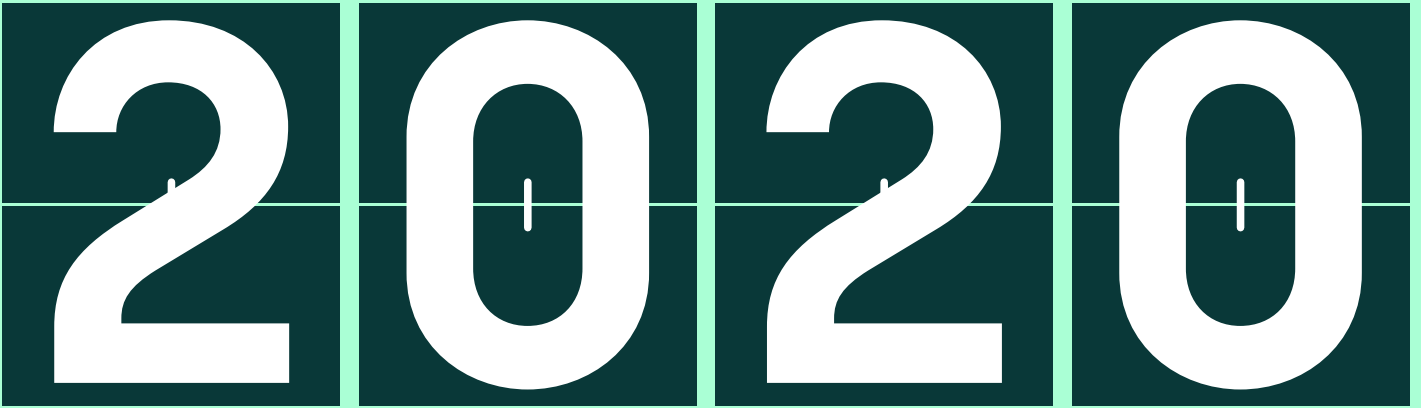


## A great place to work

We were inspired to make MAPP a Great Place to Work from day one. We started winning awards for it in 2013, with MAPP making it on to the illustrious Best Companies Index for two years in a row. (we won a 2 star in 2013 and 1 star in 2014).

Extraordinary people, recognised leaders across all key disciplines in the industry, and a values-based culture resulted in MAPP achieving Property Week's 'Best Places to Work in Property' in 2018, 2019 and 2020.





Particularly in the context of the events of 2020 we imagine a world where we all wake up each day inspired to get to work, feel valued whilst there, and return 'home' at the end of the day fulfilled by the work we have done and feeling that we have contributed to something as part of a team which is greater than just ourselves.

We achieve this through a combination of cultural norms and expectations as set out in our Company Values and our People Plan - see [MAPP Spirit Guide](#) as well as the formal policies set out below.

It's important for you to note though that alongside our core values there are some things which we take as a 'given', and trust you to do without the need for any direction; teamwork for a start, but also honesty and integrity, playing nice, minding your manners, and the golden principle of 'treating others as you would wish to be treated'.

## Equal opportunities and diversity

**We believe that diversity and inclusion is an essential component of creating a Great Place to Work. For that reason we strive to recruit people from diverse backgrounds who have exceptional talent and ability.**

We celebrate our differences and believe that diverse perspectives are a key actor in our success and the impact we can make.

MAPP is an equal opportunity employer and is committed to ensuring that within the framework of the law, MAPP's workplaces are free from unlawful discrimination on grounds of race, colour, ethnic or national origin, gender (including gender reassignment), marital or civil status, sexual orientation, age,

religion or belief, disability, pregnancy, maternity or adoption rights, trade union membership or part-time or fixed-term working.

MAPP aims to ensure that all employees achieve their full potential and all employment decisions are taken without reference to irrelevant or discriminatory criteria.

[For more information on Equal Opportunities please read the full policy here](#)



## Anti-Harassment

“Harassment” refers to conduct that has the purpose or effect of creating an intimidating, hostile or offensive work environment for any person or group of people. Harassing conduct can be either sexual or non-sexual in nature.

At MAPP, harassment of any kind is not acceptable and will not be tolerated. While harassment based on an employee’s protected status (such as race, gender, religion, etc.) also may be unlawful, we consider harassment for any reason to be a violation of our Code.

MAPP takes all allegations of harassment seriously; we will respond promptly to complaints of harassment and take action when inappropriate conduct has occurred. Individuals found in violation of these policies will be subject to disciplinary action, up to and including termination.

[For more information on Anti-Harassment please read the full policy here](#)



## Health & Safety


MAPP is committed to achieving high standards of health and safety not only in respect of its own employees but also in relation to occupiers, clients and visitors to MAPP and its managed property portfolio, contractors working on the premises, and employees and members of the public who may be affected by MAPP’s activities. We are all collectively responsible for maintaining a safe workplace.

We expect our people to help promote our health and safety culture as well as to assume responsibility for the safety of themselves, their co-workers, clients and our other business partners. We can all help create a healthy workplace by following health and safety rules and policies, exercising good judgement and common sense and immediately reporting unsafe conditions and accidents.

A safe work environment is also free from all forms of violence, actual or threatened, and acts of intimidation or abuse. If you witness an act of violence, you have a responsibility to report it immediately to your manager or the MAPP People Team.

[For more information on Health & Safety please read the full policy here](#)

# Positive Mental Health and Wellbeing

A stylized smiley face graphic composed of two solid black circles for eyes and a thick, curved black line for a smiling mouth, positioned to the left of the first text block.

Research shows that mental health is one of the biggest challenges within the workplace and it affects a high percentage of people throughout the UK.

We are committed to developing an approach to mental health and wellbeing at work that protects and improves it for everyone.

[For more information on Mental Health and Wellbeing please see the resources available here](#)

## Flexible Working

Research shows that mental health is one of the biggest challenges within the workplace and it affects a high percentage of people throughout the UK. We are committed to developing an approach to mental health and wellbeing at work that protects and improves it for everyone.

Our strategy is to encourage and support all mental health and wellbeing challenges as best as possible through open dialogue and active support in a safe and authentic way, free from discrimination.



For more information on [Flexible Working](#) please read [the full policy here](#)



## Training and Development



**MAPP is a company that places a high value on personal growth and we want everyone to take as many opportunities as possible to 'get better'.**

MAPP's policy is to make sure that you have the training and development you need to do your job properly both now and in the future but this can only be done as a partnership with you.

Much of the Company's training and development will take place within the workplace by experienced members of the team, but you may be asked to attend external events and courses when there is a relevant business need.

You are expected to participate in all organised training which you are asked to attend.

## Behaviour at work

Good team working is essential to the success of MAPP's business. It is the responsibility of each member of our team to ensure that they promote good working relationships and behave in accordance with the highest professional standards.

You are expected to be polite and considerate at all times to your colleagues and to our clients, partners and suppliers. The following are expressly forbidden on Company or clients' premises either during or outside working hours:

- Consumption of illegal drugs
- Buying or selling of goods
- Gambling
- Political activities
- Unauthorised use of Company or clients' equipment, including telephones and computers

## Alcohol & Drug misuse

The taking of illegal drugs during the working day or in our offices or the properties we manage is prohibited. A breach of that policy would amount to Gross Misconduct and could result in your summary dismissal.

Our policy on alcohol is a little more relaxed but we all know that the consumption of alcohol affects our performance. Given that we would strongly encourage you to avoid alcohol during the working day. There are a few occasions when alcohol consumption may however be appropriate (entertaining clients or a celebration).

In that situation the consumption must be minimal to moderate (1 or 2 units) and you should avoid working on anything where mistakes could be costly afterwards.

If you are clearly intoxicated you will be deemed to have breached our policy. That would amount to Gross Misconduct and could result in your summary dismissal.

## Privacy and personal data protection

In the course of working with our clients and key partners, we are often granted access to their confidential information. We have an obligation to our clients, to each other and to the company to ensure appropriate security for all confidential information and other information assets within our control.

### IT Use and Security

To fulfil our duties there are some overarching principles you must adhere to:

- Do not cause harm to our clients (e.g. by circumventing user authentication, exporting or sharing data without consent and/or using approved protocols).
- Do not cause harm to MAPP (e.g. by using unapproved cloud-based applications, installing unauthorised software, revealing passwords or forging emails).
- Do not cause harm to others (e.g. by misusing confidential information, sending chain or junk mail or violating intellectual property rights).

[For more information on Information Security and Privacy please read the full policy here](#)

### Privacy

We each provide certain personal information to MAPP in the course of our employment, including sensitive personal information, and we are committed to securing that information to protect everyone's privacy and identity. Some examples of sensitive employee information include benefits and compensation information, contact information, government-issued ID numbers and medical information.

We do not obtain or use our coworkers' or MAPP job applicants' personal information without a business need. If your job brings you in contact with personal information of either MAPP employees or clients (including customers of our clients), take special care to protect it from loss or theft. Access and use of such personal information is restricted to the extent necessary and in accordance with the law.

[For more information on our internal GDPR policy click here](#)

## Business Continuity

As part of our commitment to maintaining a sustainable business and safeguarding the interests of all our stakeholders MAPP has a rigorous business resilience strategy aligned with ISO22301 principles.

As part of our policy we include reviews of risk, impact analysis and mitigation plans that are tested and reported on regularly to both senior management and our clients. The core plan is built on three high-level scenarios involving denial of offices, denial of systems and denial of people.

[For more information on MAPP Business Continuity please read the full policy here](#)

## Communications Resources

MAPP provides a powerful set of tools and services to help us perform our job functions more efficiently.

In order to ensure the security and speed of our computer network and systems, support our human resources policies and maintain a comfortable working environment for all employees, we adhere to a set of policies related to these resources. We are all responsible for using good judgment and not making improper or excessive use of any company provided resources, such as laptops, phones, email and so on.

Employees should ensure their personal activities do not improperly utilise the resources of MAPP.

[For more information on our Communications Policy please read the full policy here](#)



## Internet and Social Media usage

MAPP is building its corporate social media presence and in order to do so, we encourage our people to support and engage with our content.

As an employee of MAPP, you are a representative of our brand.

We understand that you'll have your own active social media accounts e.g. on LinkedIn. Assuming that you have added MAPP as your employer, we ask you to take care to ensure that any post, discussion, thread or tweet is in keeping with MAPP's culture.

Our social ambition is to showcase our specialists, and enable you to share your expert knowledge in a professional and constructive way.

For more information on our Internet and Social Media guidance please read the full policy [here](#)

## Records and Information Management

**Our data management policies, practices and standards are designed to help each of us make appropriate judgments about what we delete, what we retain and why.**

The following guidelines must be adhered to:

- Records must be managed efficiently and in a confidential manner (consistent with guidelines on storage and access of information and any specific guidelines that may be agreed with the client).
- Records are retained only for such period as necessary to satisfy business, applicable legal and regulatory requirements, after which time they are appropriately disposed.
- Records may not be disposed of (destroyed or removed) once anyone at MAPP receives a notification or otherwise has knowledge of pending litigation or regulatory action.
- Records are not the property of employees and, upon an employee's departure from MAPP, must be turned over to a manager or other person designated by MAPP.
- Keep in mind that the Records and Information Management policy also applies to video, audio and photos.
- Treat these assets with the same confidentiality you would client data.

# Our responsibilities to our clients and occupiers



Our overarching approach is about going beyond the basics and giving clients more.







**Exceptional service has always been and remains our priority and our specialisation – that we are not a global multitasking PLC gives us the freedom to help our clients and occupiers in more ways than ever before.**

The MAPP approach is about building strong relationships, challenging convention, delivering exceptional levels of sustainability, creating great spaces and using the best tech to improve the customer experience. We call this modern, passionate style of property management V2.0. MAPP are leading the industry in doing it sustainably and committing to social impact and health and wellbeing.

Alongside these aims we must pay attention to the ‘how’ of this and we set out below the professional standards and conduct that safeguard our ability to deliver and our reputation and influence as a leading firm within the UK real estate sector.

## Quality assurance

MAPP holds two principal international standards. ISAE 3402 accreditation for Financial Reporting and Accounting, and ISO 45001. This latter certification was achieved in 2019 to replace previous accreditations for ISO 14001 in respect of Environmental Management and OHSAS 18001 for Health & Safety.

MAPP were the first mainstream Property Manager to achieve ISAE 3402 accreditation. To support our absolute commitment to providing appropriate and adequate internal controls we have an external audit via BDO, who issue an annual Assurance Report on our internal objectives and controls under ISAE 3402.

This is available to our clients and many find that their own auditors are willing to place reliance on this which aids and reduces client audit work.

## Conflicts of Interest

Each of us is expected to produce work for our clients and MAPP at the highest level, free from any conflicts of interest.

A conflict of interest can arise when our personal interests appear to, or actually do, interfere with our ability to perform our jobs effectively and without bias.

All employees and Directors of MAPP will strive to avoid any conflict of interest between the interests of MAPP on the one hand, and personal, professional, and business interests on the other. This includes avoiding actual conflicts of interest as well as the perception of conflicts of interest.

[For more detailed information on your obligations please read the full Conflicts of Interest policy here](#)



## Anti-Bribery and Corruption



**Our policy at MAPP is to be honest and ethical in everything we do. We act professionally, fairly and with integrity in all our business dealings and relationships, whether with clients, suppliers, our employees or others.**

[For more detailed information on your obligations please read the full Bribery Prevention Policy here](#)

We condemn bribery in all its forms and will not tolerate it within our business or in those that we do business with. Our policy sets out how we can take steps to avoid becoming involved in bribery and corruption and what to do if you are confronted with it. It should be read by all individuals working with or for the company, including directors, consultants, employees, contractors, and agency staff.

It is the responsibility of all employees, contractors and agents to report any reasonable suspicions of bribery and corruption. All concerns will be handled sensitively and the company will support anyone who raises genuine concerns in good faith under this policy, even if they turn out to be mistaken. No person shall suffer detrimental treatment for refusing to take part in bribery or for raising concerns in good faith.

## Fraud Policy

MAPP has a commitment to high legal, ethical and moral standards. All members of staff are expected to share this commitment. The Executive Management Board has put in place procedures that reduce the likelihood of fraud occurring. These include documented procedures and systems of internal control and risk assessments. In addition the board tries to ensure that a risk and fraud awareness culture exists.

All managers and team leaders have a duty to familiarise themselves with the types of improprieties that might be expected to occur within their areas of responsibility and be alert for any indications of irregularity.

[For more detailed information on your obligations please read the full Fraud Policy here](#)

## Anti-facilitation of Tax Evasion Policy

It is our policy to conduct all our business in an honest and ethical manner. We take a zero tolerance approach to facilitating tax evasion, whether under UK law or under the law of any foreign country.

The prevention, detection and reporting of tax evasion and foreign tax evasion are the responsibility of all those working for us or under our control. You are required to avoid any activity that might lead to, or suggest, a breach of this policy.

[For more detailed information on your obligations please read the full Anti-facilitation of Tax Evasion Policy here](#)

## Anti-money laundering policy

The Proceeds of Crime Act 2002, the Terrorism Act 2000 and The Money Laundering, Terrorist Financing and Transfer of Funds Regulations 2017 place obligations on companies and its employees to establish internal procedures that reasonably establish the identification of an individual or company that they conduct transactions with, to ensure they are satisfied with the legitimacy of their business.

MAPP currently incorporates a risk based approach to Money Laundering as we are non-regulated but in line with our core value of best in sector we follow the full process of monitoring clients and occupiers. We are compliant with RICS recommended best practice of applying anti-money laundering procedures.

[For more detailed information on your obligations please read the full Anti-money laundering policy here](#)

## Complying with Modern Slavery Laws



MAPP recognises that modern slavery is a crime and a violation of fundamental human rights. It takes various forms, such as slavery, servitude, forced and compulsory labour and human trafficking, all of which have in common the deprivation of a person's liberty by another in order to exploit them for personal or commercial gain.

[For more information on your obligations please read the full Modern Slavery Policy here](#)

We are committed to acting ethically and with integrity in all our business dealings and relationships and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in our own business or in any of our supply chains.

# Our approach to sustainability and social value



## Our Responsibility to The Environment

We will minimise the potential harmful effects of our activities on the environment throughout all of the properties we manage and be conscious about our purchases within the business to reduce our negative impact.





**MAPP embeds sustainability principles into everything we do across the business to really make an impact. It is one of our core values, and an integral part of the business.**

In pursuit of this aim, we have set a specific objective to recognise that our social responsibilities and commitments to environmental protection must be considered in relation to and in support of our long term profitability.

Please see our commitment stated in [our MAPP Environmental Policy statement here](#)



## Social Value

MAPP aims to create a transformative social impact by applying our talent in partnership with innovative and effective organisations to address some of the world's most pressing social issues (UN SDGs), as well as by managing our own conduct as a firm.

The pressing social issues we're focused on are youth unemployment.



[For more information on our key partner in the area of youth unemployment please see here](#)



The MAPP team supporting The Soup Kitchen on Tottenham Court Road, which provides free food, clothes and toiletries to the elderly and homeless.



The MAPP Birmingham office volunteering with Thrive, a local charity using gardening to promote positive change in the lives of people living with disability, ill health or who are isolated and vulnerable.

## Staff Volunteering

Volunteering benefits our communities and offers a valuable opportunity for you to develop your skills, learn new ones, and broaden your horizons as you experience working in a totally different environment.

You'll get an opportunity to see how volunteering impacts some of the most underprivileged people in society and contribute your skills towards making a positive social change.

All MAPP employees are expected to take the two days they are offered off work each year to spend volunteering with a registered charity. You will be paid for both days as normal and your annual leave allowance won't be affected.

[For more information on community service please read our Employee Volunteering Guide here](#)

## Political Contributions

MAPP makes no financial or in-kind contributions to any politicians, political parties or lobby groups.



## Charitable Donations, and Sponsorships

The MAPP Charitable Foundation was set up in 2020 with the aim of effectively and efficiently supporting a range of organisations and projects that the wider MAPP team want to support.

The trustees oversee a process that includes ensuring our employees have a say in which initiatives we support.

The Foundation operates in accordance with a formal oversight policy covering political contributions, charitable donations and sponsorships. Public disclosure is made of the support provided.

## Supply Chain Partners

It is essential that suppliers and contractors operate within a framework that ensures the delivery of value for money, statutory and contractual compliance, client requirements, and sustainability amongst a range of other service specific factors.

MAPP retains a duty to ensure these are monitored and reviewed on a regular basis. Any contractor wishing to supply goods or perform services for or on behalf of MAPP and their clients must undergo a number of rigorous operational, sustainability, compliance and financial checks, which are designed to ensure that they are fit for purpose and are aligned with our values and those of our clients.

[For more detailed information please read the full Procurement Policy here](#)

# Reporting and Corporate Governance



## Corporate Governance

MAPP recognises the importance of effective governance to protect the interests of our stakeholders including clients, occupiers, employees, suppliers and the communities we impact.



We place the utmost value on building a highly trusted brand known for its social conscience, and recognise the keen public interest in seeing companies operate with higher standards, greater transparency and accountability, and fair treatment of stakeholders. We have a board structure in place designed with these aims in mind and to ensure effective accountability.

For more detailed information please read [the MAPP Corporate Governance Policy here](#)



## Communications policy

MAPP recognises excellent customer service, teamwork, and a friendly working environment are aided by effective communication. At all times consider the impact your written tone and oral communication might have on clients, suppliers and colleagues.

At MAPP we operate an “open door” policy. This means that we encourage you to ask questions about the Company and its business. In addition we would like you to suggest ways to improve our existing methods of working, whenever and wherever possible.

[For more detailed information, please read the full Communications policy here](#)

## Whistleblower Reporting

MAPP encourages a philosophy of openness and accountability within the organisation. All staff are expected to maintain high standards in accordance with staff policies and to report any act that falls short of these fundamental principles. The aim of this policy is to ensure that all staff are confident in raising any matters of concern without fear of reprisals, even if they turn out to be mistaken. All employees who report potential wrongdoing will be taken seriously and the matter will be investigated appropriately and confidentially.

[For more detailed information please read the full MAPP Whistleblowing policy here](#)

# Contact information

If you have any questions or feedback in relation to anything covered within this document or any other ethical concerns about how MAPP are operating please contact:



**David Clein**  
Managing Director

[david.clein@wearemapp.com](mailto:david.clein@wearemapp.com)

0207 908 5503

07900 408 347



**Jonathan Gill**  
Chief of Staff

[jonathan.gill@wearemapp.com](mailto:jonathan.gill@wearemapp.com)

0207 908 5566

07962 705 621



[wearemapp.com](http://wearemapp.com)

**MAPP**