

## Barndoor Strategy Ltd

### CODE OF CONDUCT

May 2026

#### PREAMBLE

This Code of Conduct covers the activities of political practitioners in relation to all UK institutions of Government. This Code applies equally to all clients, whether or not fee-paying.

It is a condition of association with Barndoor Strategy Ltd that its political practitioners will accept and agree to abide by this Code and that member organisations will be jointly and severally liable for the actions of their political practitioners in relation to the Code.

Regulated political practitioners are required to endorse the Code and to adopt and observe the principles and duties set out in it in relation to their business dealings with clients and with institutions of government.

Other conditions of Association with Barndoor Strategy Ltd include:

- Being bound by the terms of Barndoor Strategy Ltd's Disciplinary Rules & Procedures
- Providing four times a year to the relevant lobbying regulator, such as the Office for the Regulation of Consultant Lobbyists, the names of all relevant clients and political practitioners during the previous three months for publication on the relevant UK lobbying register such as the ORCL Register
- Undertaking an annual compliance procedure in respect of this Code of Conduct

The Code of Conduct applies the principles that political practitioners should be open and transparent in their dealings with parliamentarians or representatives of institutions of Government; and that there should be no financial relationship between them.

Barndoor Strategy Ltd is determined to act at all times with the highest standards of integrity and in a professional and ethical manner reflecting the principles applied by this Code. In the view of Barndoor Strategy Ltd, it is inappropriate for a person to be both a legislator and a political practitioner.

#### DEFINITIONS

“Political practitioner” means a person offering public affairs services to a client on behalf of Barndoor Strategy Ltd, whether as an employee, director or Senior Counsel, whether that person is employed full- or part-time, a Senior Counsel, or an intern.

“Institutions of Government” means all United Kingdom, English, Welsh, Scottish and Northern Ireland central, regional and local government bodies and agencies, public bodies and political parties.

“Public affairs services” means offering any advice, representation, research, monitoring or administrative assistance predominantly related to UK institutions of government or those institutions of the devolved nations or regions.

## THE CODE OF CONDUCT

1. In pursuance of the principles in this Code, political practitioners are required to adhere to this Code in its entirety in order to ensure that the reputation of Barndoor Strategy Ltd and the profession of political consultancy is not brought into disrepute.
2. Political practitioners must act with honesty towards clients and the institutions of government.
3. Political practitioners must use reasonable endeavours to satisfy themselves of the truth and accuracy of all statements made or information provided to clients or by or on behalf of clients to institutions of government.
4. In making representations to the institutions of government, political practitioners must be open in disclosing the identity of their clients and must not misrepresent their interests.
5. Political practitioners must advise clients where their activities to deliberately and intentionally interact with the institutions of government may be illegal, unethical or contrary to professional practice, and to refuse to act for a client in pursuance of any such activity.
6. Political practitioners must not make misleading, exaggerated or extravagant claims to clients about, or otherwise misrepresent, the nature or extent of their access to institutions of government or to political parties or to persons in those institutions.
7. Political practitioners must not offer or give, or cause a client to offer or give, any financial or other incentive to any member or representative of an institution of government, whether elected, appointed or co-opted, that could be construed in any way as a bribe or solicitation of favour.
8. Political practitioners must not accept any financial or other incentive, from whatever source, that could be construed in any way as a bribe or solicitation of favour.
9. Political practitioners must not be employed as an MP, MEP, Member of the House of Lords or any member of the Scottish Parliament, Welsh Parliament / Senedd Cymru, Northern Ireland Assembly or the London Assembly.

10. Political practitioners must not make any award or payment in money or in kind (including equity in a member firm) to any MP, MEP, Peer or to any member of the Scottish Parliament or Welsh Parliament / Senedd Cymru, Northern Ireland Assembly, or to connected persons or persons acting on their account directly or through third parties.
11. Political practitioners must ensure that they do not benefit unreasonably by actions of any third party that, if undertaken by the political practitioner would be considered a breach of the Code.
12. Political practitioners must comply with any statute, any resolution of an institution of government and with the adopted recommendations of the Committee on Standards in Public Life in relation to payments to a political party in any part of the United Kingdom.
13. Political practitioners who also serve as members of decision-making public bodies (including local authority councillors) are prohibited from working on a client assignment of which the objective is to influence a decision of the body on which they serve.
14. Political practitioners must keep strictly separate from their duties and activities as political practitioners any personal activity or involvement on behalf of a political party, including as an office holder or candidate for office.
15. Political practitioners must abide by the rules and conventions for the obtaining, distribution and release of documents published by institutions of government.
16. Political practitioners must not hold any pass conferring entitlement to access to the Palace of Westminster, to the premises of the Scottish Parliament or the National Assembly of Wales or the Northern Ireland Assembly or any department or agency of government.
17. Political practitioners must conduct themselves in accordance with the rules of any institution of government while within their precincts, and otherwise.
18. Political practitioners must always abide by the internal rules on declaration and handling of interests laid down by any public body on which they serve.
19. Political practitioners must not exploit public servants or abuse the facilities of institutions of central, regional or local government within the UK.
20. Barndoor Strategy Ltd and political practitioners must disclose the names of all their relevant clients as required by the UK's lobbying registers.

21. In all their activities and dealings, political practitioners must be aware at all times of the importance of observing the principles and duties set out in this Code to protect and maintain their own reputation, the good name and success of their business, and the standing of the profession as a whole.

## **Barndoor Strategy**

**May 2026**