

Corporate Governance  
People & Communication  
Health, Safety & Environment  
Information & Security

Code of  
Business Ethics

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# 1 Introduction

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## Why do we need a code of business ethics?

Most businesses are successful because they set clear standards that underpin what they believe in and what they aspire to achieve.

## What is the code of business ethics?

The code of business ethics brings together the basic rules, standards and behaviours necessary to support our business success. It provides clarity about the standards we expect our staff to meet and the behaviours we expect them to demonstrate. These are not just to ensure that we comply with our legal obligations, but to make sure that staff work in a way which is consistent with our core values of Commercialism, Integrity and Stewardship. It is also a common reference point for anyone who is unclear about what is expected of them in a specific situation.

The code of business ethics does not stand alone and in order to meet the standards expected of you by The Crown Estate, you must also comply with the requirements of our Governance Framework (which is available on The Crown Estate intranet) and our prevailing suite of policies, as they apply to you and your role (again, these are available on the intranet).

## How can the code help you?

The code of business ethics should act as an initial reference point for staff seeking guidance, advice and answers to compliance issues and expectations of conduct and behaviour. The code:

- provides practical advice on how to comply with legal requirements and regulations;
- provides guidance on how you should relate to colleagues, customers, stakeholders, the media and other interested parties including the general public;
- directs you to other useful information sources, including more detailed governance policy guidance; and
- can help you to resolve difficult questions about business conduct and how to obtain confidential advice.

## How can you find out more about the code?

In conjunction with our Governance Framework, reading the code should give you enough information to handle most situations and questions you will face in your day-to-day work with The Crown Estate. If you want to know more, talk to one of the following people depending on the subject concerned:

- your supervisor, manager or director
- the People team
- the General Counsel
- the Corporate Affairs team

## Who must follow the code?

Every person working at The Crown Estate is expected to follow the code of business ethics. Temporary workers employed under contract must also follow the code. Managing agents, contractors or consultants working on our behalf or in our name will be expected to act consistently with the code.

## How can you report non compliance with the code?

If you believe that the code of business ethics has been or is being disregarded you have a responsibility to raise your concerns. You can do this through your line manager or internal audit. If you prefer you can raise your relevant concerns via the confidential whistleblowing investigation telephone number 020 7851 5399 or email [FraudReport@thecrownestate.co.uk](mailto:FraudReport@thecrownestate.co.uk). Your concerns will be taken seriously and investigated quickly. If you wish, your anonymity will be protected. If a proven disregard of our legal obligations or policies is established, appropriate action will be taken.

## What could happen to individuals who do not follow the code?

There may be consequences, not only for individuals who disregard the provisions of the code of business but also for The Crown Estate. Staff who fail to follow the code may be subject to disciplinary action, up to and including termination of employment. A breach of the code involving a criminal act could result in prosecution.

# 2 Corporate Governance



## Political activity

As Crown Servants, special conditions apply to the involvement of Crown Estate Staff in political activities.

Staff of The Crown Estate are Crown Servants and are therefore also subject to specific rules on participating in political activities.

Staff including the Chief Executive, Executive Committee members and their direct reports are automatically excluded from participating in political activities at a national level, but may participate in local political activities with the agreement of the General Counsel (in the capacity of Company Secretary) provided that they comply with any conditions set by The Crown Estate.

All other staff may be permitted to participate in national and local political activities with the agreement of the General Counsel (in the capacity of Company Secretary) and provided that they comply with the general standards stipulated in the guidance note.

Non-Executive Board Members of The Crown Estate are regarded by the Office of the Commission for Public Appointments as office holders and are not permitted to participate in political activities.

### Further information

- Policy for managing conflicts of interest
- Speak to the People team or the Legal team for advice

## Dos

- Make sure that you understand which group your appointment relates to and if in doubt speak to your line manager or the People team.
- Ensure that you understand the requirements and the need to seek prior permission before entering in to any form of political activity.
- Check before you act if you are in any doubt.

## Don'ts



- Don't use your role or business contacts to promote your political views.

# 3 People & Communication



## Consequences of misconduct

Our reputation is very important to us and we expect the utmost professionalism from our staff at all times.

<sup>1</sup>This list is illustrative and should not be considered an exhaustive list of actions.

The Crown Estate has clear expectations about the way in which staff and other people representing our business should behave. These are regularly communicated through our corporate policies and procedures, including those described in this code, and are additionally reinforced through regular conversations with people, including our performance management arrangements.

Persistent failure to meet our standards of conduct may result in disciplinary action up to and including termination of employment. Very serious breaches may result in dismissal for gross misconduct, which means your employment could be terminated without prior warning. These arrangements apply to staff at all levels in the business regardless of their position.

As a guide we consider the following actions to amount to general misconduct<sup>1</sup>: significant and/or persistent poor performance; persistent bad timekeeping; poor attendance; unauthorised absence; minor damage to our property; failure to adhere to our procedures; abusive or threatening behaviour; bringing the business into disrepute; failing to disclose pending criminal charges or convictions (not covered by the Rehabilitation of Offenders Act); persistent behaviour which contravenes the values of the business; unreasonable refusal to follow an instruction issued by a manager or supervisor; and minor breaches of the code of business ethics.

The following list provides a guide to the actions that could amount to gross misconduct: theft, fraud or offences under the Bribery Act (bribing another person, being bribed, bribing a foreign public official or failing to prevent bribery); unauthorised disclosure of company documents, and other confidential information to unauthorised third parties; unlawful discrimination or harassment; the use or distribution of illegal drugs while on the company's premises; indecency; bringing the business' reputation into serious disrepute; intentional and reckless disregard for safety and safety rules; provoking or participating in any form of violence at work; threatening, abusive or offensive language or behaviour towards colleagues, customers or suppliers; persistent refusal to carry out a reasonable instruction; gross insubordination or wilful misconduct; behaviour which seriously contravenes the values of the business; deliberate falsification of information or documents; failing to disclose serious pending criminal charges or convictions (not covered by the Rehabilitation of Offenders Act); deliberate damage to our property; and serious breaches of the code of business ethics.

Line managers, with advice from the People team, are responsible for determining any appropriate disciplinary action. Breaches of our legal responsibilities may also result in civil or criminal action being taken against staff and others who represent our business.

### Further information

- Disciplinary policy
- Performance management policy and procedure
- Speak to the People team for further advice

## Dos

- Ensure that you are familiar with the contents of this code, and the relevant policies and procedures applicable to your position.
- Encourage people to meet our expectations.
- Be a role model for others.

## Don'ts



- Don't be afraid to ask for clarification from your line manager or the People team if you are in any doubt about our expectations.

# 3 People & Communication

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## Diversity

The Crown Estate is committed to promoting and maintaining an environment where staff, business partners, stakeholders and customers are treated equally, fairly, with dignity and respect.

### Further information

- People Strategy
- Equality and Diversity policy

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## Dos

- Ensure that any employment-related decisions, including appointment, performance review, promotion, training, discipline, development and termination of employment, are determined by merit and business considerations alone.
- Ensure that you demonstrate respect and fairness in your dealings with staff and external parties. Ensure you report any concerns.

## Don'ts



- Don't tolerate unlawful discrimination of any kind.

# 3 People & Communication



## Harassment and bullying

The Crown Estate will not tolerate harassment or bullying – that is any action, conduct or behaviour which any individual or group of individuals finds unwelcome, humiliating, intimidating or hostile. Staff must, therefore, avoid actions or behaviours that are, or could be, viewed as harassment.

Although our assets and activities are located in the UK we engage with a diverse range of people from different cultures. Although we wouldn't want to stifle "fun", staff should be particularly sensitive to actions or behaviours that may be acceptable in one culture but not in another, wherever they are.

### Further information

- Bullying and Harassment policy
- Policy on use of IT

## Dos

- Treat all colleagues, suppliers, customers, stakeholders and visitors with respect.
- Find out about local behaviours, practices and customs that may differ from those you are used to, be sensitive to differences and be prepared to adapt your behaviour accordingly if travelling in another country.
- Speak up and tell a person if you are upset by their actions or behaviour, explain why and ask them to stop.
- Listen to feedback from others.
- Speak to your line manager or the People team if the harassment continues.
- Use an informal approach to try to resolve the issue where appropriate before raising a formal grievance.
- Use the formal grievance procedure if the matter is serious or the informal approach is not successful.
- Consider the tone and presentation of emails and how others might interpret your meaning.

## Don'ts



- Don't behave in an unwelcome, humiliating, intimidating or hostile manner.
- Don't make inappropriate jokes and comments.
- Don't distribute or display offensive material, including inappropriate pictures or cartoons.
- Don't spread malicious rumours or use email, voicemail or other electronic media to transmit derogatory, harassing or abusive information.

# 3 People & Communication

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## Maintaining a professional image

Personal appearance can influence what people think about you and our business.

### Further information

- Speak to Health & Safety or your line manager about protective clothing/equipment

The Crown Estate expects staff to project a professional appearance. This means dressing in an appropriate manner. Naturally, staff are expected to be clean and of neat appearance at all times.

Most Windsor estate staff are supplied with a uniform, which must be worn whilst on duty and worn only to and from work at all other times.

Protective clothing/equipment is also supplied for certain work-related activities to comply with health and safety standards, and must be worn at all times.

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## Dos

- Dress in a way that is neat and tidy in appearance, and appropriate for your position and part of the business.
- Wear any protective clothing that is issued to you.
- Carry your Crown Estate ID badge at all times.
- Project a professional appearance.

## Don'ts



- Don't wear inappropriate clothing whilst at work.



# 3 People & Communication

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## Business etiquette

The way a person interacts, or is perceived to interact, with others can create – whether fairly or not – an image of that individual. Small things that might otherwise go unnoticed can often make the difference between being viewed as professional or not.

### Further information

- [Our customer standards](#)

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## Dos

- Ensure you get to meetings on time – don't make others wait for you.
- Ensure you're prepared for meetings.
- Return phone calls and emails promptly.
- Greet colleagues.
- Respect the opinions and decisions of others, even if you disagree with them.
- Ensure your conversation is conducted in an appropriate venue if it is business sensitive or personal.
- Switch off mobile phones during meetings. If you are expecting an urgent call or email, please ask the chair's permission to be excused before the meeting commences.
- Keep your language appropriate in the workplace.
- Refrain from gossiping.

## Don'ts



- Don't hold personal, sensitive or confidential conversations in earshot of others.
- Don't interrupt when others are speaking.
- Don't monopolise conversations.
- Don't answer mobile phones or answer emails during a meeting.
- Don't forget to be polite – a simple "please" and "thank you" can make a big difference.
- Don't leave your mobile phone switched on if you're away from your it.

# 3 People & Communication



## Drugs & alcohol

The use of alcohol and drugs (including certain types of prescription medication) within the workplace can increase the likelihood of injury through impaired judgement.

Staff are reminded of the following:

- Staff must not report for work in an impaired condition.
- The use, supply or possession of illegal drugs within the workplace is prohibited.
- Staff must ensure that any prescribed medication does not impair their ability to complete their duties in a safe manner – especially when driving, operating or using plant and machinery – and must inform their line manager of any restrictions or controls.
- Staff with drink or substance abuse issues may seek help and advice from our staff assistance programme.

Staff are responsible for ensuring that they refrain from drinking if they plan to drive.

- Where medication is issued to control an existing condition, it is the responsibility of the staff to ensure that this medication is taken so as to prevent ill-health or injury.
- Staff working in safety critical environments are not permitted to drink whilst on duty or whilst in control of equipment.

Failure to comply with these requirements may result in disciplinary action.

### Further information

- Employee Assistance Programme
- Speak to the People team for further advice

## Dos

- If you suspect someone is under the influence of drugs or alcohol, report it.
- Tell your line manager if you are on medication.

## Don'ts



- Don't come to work if you have been drinking.
- Don't allow others to work or operate machinery if you suspect they are under the influence of drugs and alcohol.

# 3 People & Communication



## Social media

Social media is a fast and influential way of communicating with people and plays an important role in our communications mix. However, care needs to be taken to ensure The Crown Estate's views are not misrepresented or that inappropriate comments cannot be attributed in some way to our business.

The Crown Estate carefully selects and uses social media channels to amplify its engagement with key audiences, including sharing news, images, videos and infographics to add depth to our stories and content. It also uses social media channels to share timely updates on events and incidents.

For our staff using social media, work related accounts (such as LinkedIn) are a great way to share the organisation's expertise, enhance our networks, raise the profile of key personnel and create a more conversational and personable tone for our brand.

However, the fast-paced and direct nature of social media also requires extra care across all of our corporate, consumer or individual social media accounts. It is worth remembering that anything shared online is permanently available and open to being published in other media.

The Corporate Affairs team is responsible for the governance of all aspects of digital activity related to the business. Any reference to your employment at The Crown Estate or sharing our messaging will automatically make your account work related. Even if you choose to keep it separate to work, the activity on your account can reflect on the organisation, particularly if it relates to our customers, stakeholders, supply chain or a contentious issue.

Therefore, we ask that all our staff using social media are mindful of their relationship to The Crown Estate and adhere to the wider code of business ethics, and the mandatory online training for Information Security, Data Protection and Freedom of Information. This is alongside the good practice outlined below.

### Further information

- Speak to Corporate Affairs for more information

## Dos

- Know and follow our code of business ethics.
- Be personally responsible for the content you publish online and its accuracy.
- Exercise due caution and responsibility with regard to communicating with customers, colleagues, suppliers or any other individual related to The Crown Estate.
- Be mindful of how posts, and posting history, will reflect upon your job role and The Crown Estate.
- Speak to Corporate Affairs if you are approached or harassed on social media on sensitive issues relating to your role or The Crown Estate by media, stakeholders or the general public.
- Respect copyright, fair use and financial disclosure laws.

## Don'ts



- Don't post anything that you would not otherwise relay to the press, a colleague, or place in the wider public domain.
- Don't be critical of stakeholders, customers, suppliers or any group connected to The Crown Estate.
- Don't allow your online activities to interfere with your job, colleagues or commitments to customers.

# 3 People & Communication



## Dealing with the media and other stakeholders

The Crown Estate and its property assets are of interest to the media and other stakeholders.

Handled carefully, communication with the media and engaging with stakeholders is a powerful and important part of shaping our reputation.

However, The Crown Estate needs to be vigilant in managing its relations with the media because our actions, reputation and the stories written about us affect our commercial activities and reflect on a diverse and high profile range of stakeholders and partners.

All media enquiries must be directed to the press office so they can keep a log of enquiries and ensure an appropriate and consistent message is given to journalists. Even if you are familiar with the journalist or you know the answer to the enquiry it must be directed to the press office first.

Correspondence or requests for information from politicians, such as MPs and Councillors, must be referred to Corporate Affairs in the first instance. More generally, you should work with Corporate Affairs before engaging with stakeholders.

Non-routine enquiries for information covered, or that may appear to be, covered by the Freedom of Information Act or the Data Protection Act must be forwarded to the Knowledge Management team. They will be dealt with in accordance with our standard Freedom of Information and Data Protection Act policies and procedures.

Care should also be taken when speaking to external parties. Avoid talking about matters where an inadvertent slip of words might lead to disclosing confidential or commercially sensitive information.

### Further information

- Speak to the Corporate Affairs for further advice

## Dos

- Refer all media enquiries to the press office even if you are experienced in speaking to the media.
- Refer all political correspondence to the Corporate Affairs team in the first instance.
- Work with the Corporate Affairs team to support your stakeholder engagement.

## Don'ts



- Don't say anything that you would be embarrassed to see in print or online, particularly during external events.

# 4 Health, Safety & Environment

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## Health, Safety and environment

The Crown Estate believes that the management of safety, health and environmental risks are essential for a business. All our staff are responsible for promoting and visibly demonstrating a positive health and safety culture based on shared values, beliefs and expected behaviours.

These values and expected behaviours are outlined in our health & safety policy:

It is the policy of The Crown Estate, so far as reasonably practicable, to protect the environments in which we operate and ensure the safety and health of our staff and others exposed to the risk created by our activities.

To enable this and to ensure that we can improve our performance, this policy sets out our integrated approach to safety, health and environmental management.

To achieve these aims we will:

- develop suitable systems and controls that clearly identify roles and responsibilities throughout the organisation;
- identify the significant safety, health, and environmental risks (including polluting activities) presented by our activities and where reasonably practicable to do so, eliminate those risks or mitigate their impact;
- ensure that staff are aware of and have access to relevant training, suitable equipment and relevant safety documentation that enables them to work in a safe manner;

- develop monitoring and measurement systems to assess performance and identify learning opportunities from events with unexpected outcomes;
- implement suitable reporting structures and lines of communication to enable a ready flow of information throughout the organisation. We recognise that compliance with this policy and associated management systems alone may not be enough to protect the environments in which we operate and to ensure the health and safety of our staff and others exposed to the hazards of our activities. Therefore we will communicate our policies in a positive and consistent manner, and actively seek employee feedback on the effectiveness of these controls to enable us to conduct our business in a considerate and diligent manner.

We believe that it is the responsibility of all our staff to promote and visibly demonstrate a positive culture towards safety and protection of the environment based on shared values, beliefs and expected behaviours.

# 4 Health, Safety & Environment



## Health, Safety and environment

The Crown Estate believes that the management of safety, health and environmental risks are essential for a business. All our staff are responsible for promoting and visibly demonstrating a positive health and safety culture based on shared values, beliefs and expected behaviours.

### Further information

- Safety, health and environmental procedures of control (held on Wisdom and i-site)
- Speak to the HSE & Wellbeing team for further advice

### Dos

- Make sure that you are aware of the policies and procedures that have been developed to control business risks and ensure that you adhere to these control measures.
- Follow the requirements of any risk assessments or safe operating procedures applicable to your role.
- Report all accidents, incidents and environmental incidents to your line manager.
- Isolate unsafe equipment immediately and report all hazards, malfunctioning and defective equipment and machinery, and unsafe conditions immediately to your line manager.
- Use all personal protective equipment correctly.
- Use appropriate safety devices applicable to your job, and maintain the equipment in good order reporting any unserviceable equipment or controls immediately to your line manager.
- Undertake the appropriate and necessary training for you to carry out your job in a competent and safe manner.
- Ensure familiarity and compliance with the emergency procedures applicable to your place of work and job.
- When in doubt over matters affecting safety, health and environmental management ask for help.
- Ensure anyone you manage is capable to carry out their role, and has access to resources, and safe and suitable equipment to ensure they can work safely and healthily.

### Don'ts



- Don't take shortcuts.
- Don't intentionally or recklessly interfere with or misuse anything provided in the interest of health, safety or welfare.
- Don't ignore health and safety – a failure to comply with any of the above requirements could result in disciplinary action being taken.
- Don't ignore a situation or activity that could cause harm.

# 5 Information & Security



## Security

The Crown Estate conducts significant amounts of business which is of a commercially sensitive nature and of interest to others. It is imperative that all reasonable measures are taken to protect access to this information.

### Further information

- [ISMS policies and guidance](#)
- [Speak to the Business Technology team](#)

### Dos

- Ensure you keep your password secure. If you think someone else may know it, change it!
- Make sure you report anything unusual about any electronic equipment issued to you.
- Ensure that you understand your responsibilities under the Data Protection and Freedom of Information Acts.
- Ensure that sensitive/critical data is encrypted before transit.
- Ensure that if you are responsible for managing outsourced contracts, suitable arrangements for data exchange are in place with third parties where personal data of a sensitive, critical, or valuable nature is exchanged.
- Lock away mobile IT equipment outside normal hours of business.
- Remember to take extra care if working in public places – ensure that what you're working on can't be overseen.
- Take care not to mention names of companies or people when conducting conversations in public places where you could be overheard.

### Don'ts



- Don't disclose your password to anyone.
- Don't install software on Crown Estate IT equipment.
- Don't store records on the C drive of your computer.
- Don't use your business email account for personal gain.
- Don't use external email accounts (eg Gmail, Hotmail, yahoo, AOL) to conduct Crown Estate business.
- Don't allow visitors unescorted access around working offices.

# 5 Information & Security



## Physical security

The Crown Estate operates a robust physical security policy designed to mitigate against an ever changing threat landscape and to protect our people and our assets. Staff are required to be vigilant at all times and to embrace the challenge culture of the business.

### Further information

- Physical Security Plans for SJM and Windsor
- Speak to the Operational Resilience for further advice

## Dos

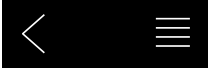
- Inform reception that you are expecting visitors before they arrive.
- Meet your guests at reception and host them.
- Escort your visitors back to reception at the end of your meeting.
- Display your identification badges / swipe cards at all times.
- Report any lost identification badges / swipe cards to the Concierge team either via email or telephone.
- Report all security incidents to the Operational Resilience or Concierge teams immediately.
- Keep desks and workstations clear when not in use.

## Don'ts



- Allow people to 'tailgate' you into Crown Estate areas of the building.
- Take sensitive paper documents out of the office unless absolutely necessary.
- Leave sensitive or personal documents or devices unattended.
- Use neighborhood storage for anything other than essential paper documents.
- Leave your screen unlocked when away from your desk.
- Leave documents behind in meeting rooms and on printers.





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