

## Code of Conduct - Training Plan

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### Introduction

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## Introduction

This Code of Conduct Training Plan sets out how Browser London Limited ensures that all employees, contractors, and associates understand, apply, and uphold the standards defined in the Code of Conduct. The training supports ethical behaviour, professional delivery, data protection, and responsible use of technology across all client engagements.

## 2. Code of Conduct Training Plan

Code of Conduct objective	Current position / baseline	Action / task	When	Person responsible	Resource implications	Measure of success
Ensure all staff understand and comply with the Code of Conduct	Code of Conduct is documented and available to all staff and contractors	Include Code of Conduct review as part of onboarding and induction	During induction for each new starter, including contractors	Managing Director	Minimal, internal documentation	All starters confirm understanding and acknowledgement
Reinforce ethical behaviour and professional standards	Ethical standards embedded through leadership and working culture	Annual refresher briefing covering key principles, client conduct, and expectations	Annually	Managing Director	Internal session	Continued alignment with expected behaviours, no substantiated breaches
Promote responsible client engagement and delivery	Professional delivery standards applied consistently across projects	Incorporate Code of Conduct discussion into project kick off and internal reviews where appropriate	At project start and during delivery reviews	Managing Director / Project Lead	None	Consistent client feedback and delivery quality
Ensure understanding of confidentiality and data protection responsibilities	GDPR and security practices already in place	Reinforce Code of Conduct sections covering confidentiality, data handling, and secure working	During induction and annual refresher	Managing Director	Internal guidance	No data handling incidents or breaches
Support responsible use of technology, including AI	AI used selectively and with client approval	Include guidance on ethical use of technology and AI within training materials	During refresher training and policy updates	Managing Director	None	Clear, transparent use of technology aligned with client expectations
Encourage accountability and speaking up	Open communication culture exists	Reiterate reporting routes and non retaliation principles within training	Ongoing, reinforced annually	Managing Director	None	Issues raised early and handled appropriately

## 3. Review and Continuous Improvement

The Code of Conduct Training Plan is reviewed periodically alongside the Code of Conduct itself. Feedback from staff, contractors, and client engagements is used to refine training content and ensure it remains relevant, practical, and aligned with regulatory and ethical expectations.

Training effectiveness is monitored through:

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- Ongoing professional behaviour and delivery quality
- Absence of substantiated conduct or compliance issues
- Positive client and partner feedback