

Image Line Communications Ltd

Public Affairs and Lobbying Code

Registered office: Unit 228, Stratford Workshops, Burford Road, London E15 2SP

Company number: 2210672

Version: 1.2

Date: 1 January 2025

1. Purpose and scope

At Image Line Communications, we are committed to conducting public affairs and lobbying activities to the highest standards of integrity, transparency, and professionalism. This Code sets out how we operate in line with UK law and recognised industry standards.

Although our staff are not members of the Chartered Institute of Public Relations (CIPR), **we align our practices with the CIPR Public Affairs Code and the CIPR Code of Conduct**. This ensures that our clients can be confident that our lobbying work is carried out responsibly and transparently.

2. Our commitments

We follow the ten professional behaviours required under the CIPR Public Affairs Code. This means we will:

- Be open about who we are, who we represent, and the purpose of our engagement.
- Never mislead and always act with honesty and integrity.
- Ensure the information we provide is accurate and capable of verification.
- Never offer or accept bribes or inducements. Any hospitality must be proportionate and recorded.
- Manage conflicts of interest responsibly and pause work if a conflict arises.
- Safeguard confidentiality and avoid misuse of privileged information.
- Comply with the rules of Parliament, devolved administrations, government departments and public bodies.
- Support transparency by identifying the interests we represent.
- Respect rules relating to elected representatives, officials and public servants, including any cooling-off periods.
- Avoid using privileged access or passes to gain an improper advantage.

3. Standards for our team

Our internal rules ensure our activity is ethical, transparent and professional:

- **Transparency:** We always declare who we represent and why.
- **Accuracy:** Facts are checked, and errors corrected without delay.

- **Conflicts of interest:** Declared immediately and resolved before continuing activity.
- **Hospitality:** Only modest and proportionate hospitality is permitted, and all offers are logged.
- **Political activity:** We do not use party positions, passes or privileges to lobby.
- **Confidentiality:** All information is handled securely and used only for legitimate purposes.
- **Record keeping:** Accurate records are maintained of meetings, calls and correspondence.
- **Competence:** We only undertake work we are qualified to deliver and ensure training is in place to maintain standards.

4. Oversight and governance

- **Responsibility:** The Image Line Board has overall responsibility for compliance. Daily oversight rests with our **Compliance Lead**.
- **Review:** This Code will be reviewed at least annually and updated in line with legislation and industry standards.
- **Suppliers:** Any partners or subcontractors undertaking public affairs work on our behalf must work to equivalent standards.

5. Complaints and reporting

If you believe Image Line has not met the standards in this Code, please contact **Susan Terpilowski, Managing Director**, at the registered office or email admin@imageline.co.uk.

Concerns about wider lobbying standards can also be raised with the **Office of the Registrar of Consultant Lobbyists**.

6. Company details

Image Line Communications Ltd

Registered office: Unit 228, Stratford Workshops, Burford Road, London E15 2SP

Company number: 2210672

Contact: admin@imageline.co.uk

7. Standards we align with

- **CIPR Public Affairs Code (2024)**
- **CIPR Code of Conduct**
- **Office of the Registrar of Consultant Lobbyists – compliance guidance**
- **Transparency of Lobbying, Non-Party Campaigning and Trade Union Administration Act 2014**