

**White, Alex**

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**From:** Wayne Matthew  
**Sent:** Wednesday, 16 April 2008 12:53 PM  
**To:** Lobbyists Register  
**Subject:** Exposure Draft - Lobbying Code of Conduct  
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**Attachments:** GR Solutions Code of Conduct.pdf

Thank you for the opportunity to comment on the Exposure Draft of the "*Lobbying Code of Conduct*".

As a general observation I find the document an appropriate first step toward assisting the development of a professional and publicly accountable "lobbying" industry which compared to the USA, Canada and the UK is very much in its infancy. I believe that the "*Lobbying Code of Conduct*" will provide a level of satisfaction and protection for clients of "lobbying" companies, for Ministers, Parliamentary Secretaries and their staff and for employees of the Australian Government.

In the absence of any Code of Conduct in the jurisdictions where my company undertakes work for clients, the attached Code of Conduct has been developed and is adhered to.

My only concern in relation to the Exposure Draft of the "*Lobbying Code of Conduct*" is the content of 10.1. It is my view that adult persons who have served a term of imprisonment and / or been convicted of any offence involving dishonesty should be excluded from the Register. I therefore propose that 10.1 be reworded to read:

*10.1 The Secretary shall not include on the Register the name of an individual unless the individual provides a statutory declaration to the effect that he or she:*

*(a) has never been sentenced to a term of imprisonment, and*

*(b) has not been convicted, as an adult, of an offence, one element of which involves dishonesty, such as theft or fraud.*

I believe that these changes further assist the development of an industry with the highest standards of integrity.

Regards

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Hon. Wayne Matthew

Director

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18/06/2008

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# **Code of Conduct**

## **Preamble**

This *Code of Conduct* is founded on three concepts:

- Free and open access to government is an important matter of public interest;
- Representing client interests to public office holders is a legitimate activity;
- Representation and advocacy must be undertaken in an open, honest and fully accountable manner.

We believe that a *Code of Conduct* is an important initiative for promoting public and client trust in the integrity of government decisions resulting from interaction with GR Solutions. To this end, any work undertaken by our company is required to abide by standards of conduct, which are set out below.

## **Principles**

### **Integrity and Honesty**

We will conduct with integrity and honesty all contact with public office holders, clients, employers, the public and other government relations companies.

We will not make misleading, exaggerated or extravagant claims about the nature or extent of our ability to achieve outcomes.

We will advise clients where their objectives may be illegal or unethical, and refuse to act for a client in pursuit of any such objective.

### **Openness**

We will at all times, be open and frank about our consulting activities, while respecting confidentiality.

### **Professionalism**

We will observe the highest professional and ethical standards and conform fully with all Australian Federal and State Government requirements of government relations companies, their employees and contractors.



## **Company Rules**

### **Transparency**

#### **1. Identity and purpose**

We will, when making a representation to a public office holder, disclose the identity of the person or organisation on whose behalf the representation is made, as well as the reasons for the approach.

#### **2. Accurate information**

We will provide information that is accurate and factual to public office holders. Moreover, we will not knowingly mislead anyone and shall use proper care to avoid doing so inadvertently.

#### **3. Disclosure of obligations**

We will indicate to our clients, our duties and obligations under any Australian Federal and State legislation.

### **Due Diligence and Best Efforts**

#### **4. Advocacy**

We will vigorously and diligently advance and advocate our clients' interests.

#### **5. Effort**

We will devote adequate time, attention, and resources to our client's interests.

#### **6. Keeping our Client Informed**

We will keep our clients informed regarding the work that we are undertaking and to the extent possible, will give our clients the opportunity to choose between various options and strategies.

### **Confidentiality**

#### **7. Confidential information**

We will not divulge confidential information unless we have obtained the informed consent of our client, or disclosure is required by law.

#### **8. Insider information**

We will not use any confidential or other insider information obtained in the course of our lobbying activities to the disadvantage of our client.



**Conflict of interest**

**9. Disclosure**

We will inform our clients of any actual, potential or apparent conflict of interest, and obtain the informed consent of each client concerned before proceeding or continuing with the undertaking.

**10. Competing interests**

We will not accept clients or assignments with conflicting or competing interests.

**Improper influence**

**11. Undue Pressure**

We will not directly or indirectly exert undue pressure on a public office holder.

**12. Financial Incentive**

We will not offer, give or cause a client to give, any financial incentive to any public office holder or to receive any incentive that could be reasonably construed as a bribe or solicitation of favour, nor will we propose or undertake any other action that would constitute an improper influence on a public office holder.

**13. Use of Confidential Information**

We will not use, for purposes other than those of our mandate, confidential information obtained in the course of our consulting activities.

**14. Company Board Appointments**

We will not appoint any Member of Parliament to the company board or pay any retainer or commission to any Member of Parliament or person acting on their behalf.