POLICY 5 · STAFF AND CLIENT POLICY

Code of Conduct

How TRUE staff, moderators and clients behave around TRUE workers, so young people stay safe and their feedback stays independent.

True Intel Ltd, trading as TRUE · Company no. 17255261

Version 1.0 · Approved by Victoria Phillips, Director · 3 November 2026

All contact with TRUE workers goes through official TRUE channels, and no client or store ever briefs, pays or contacts a worker directly. These boundaries protect young people and the independence of their feedback.

Part A: TRUE staff

1. Who this applies to

1.1 Part A applies to TRUE directors, staff, contractors, volunteers and focus group moderators: anyone who has contact with TRUE workers or access to their data. In this Code, "staff" means all of them.

1.2 It works alongside the Safeguarding and Child Protection Policy. Breaking this Code can be a safeguarding concern as well as a conduct issue. In all research, TRUE follows the Market Research Society (MRS) Code of Conduct (www.mrs.org.uk/standards/code-of-conduct).

2. Communication

2.1 Contact workers only through official TRUE channels: the TRUE app, a TRUE email address or a TRUE phone. Never use a personal phone, personal email or messaging apps such as WhatsApp or Snapchat.

2.2 Keep messages short, professional and about TRUE work. No kisses, pet names, private jokes or comments on appearance.

2.3 Only message workers between 10:00 and 19:00, never before 10:00, except about their safety.

2.4 Only ask for personal information TRUE needs for the work. Never ask a worker to keep anything secret from their parent or guardian.

2.5 If a worker contacts you on a personal channel, don't reply there. Answer through the app if needed, and tell the DSL.

3. Social media

3.1 Do not follow, friend, connect with or accept requests from workers on personal social media. Decline any request, log it and tell the DSL.

3.2 Never post about a worker, or share their name, school, location, image or anything they have said or submitted, unless TRUE has separate written consent from them and, if they are under 18, their parent or guardian.

3.3 Only TRUE's official accounts post about TRUE work, and only with that consent.

4. Boundaries

4.1 Staff must not:

- meet a worker alone, or anywhere private;
- give a worker a lift in their own car;
- give gifts, money or favours outside TRUE's normal pay;
- show favouritism in offering assignments;
- have any romantic or sexual relationship with a worker, or behave in a way that could be seen as grooming;
- share or show inappropriate content;
- drink alcohol or use drugs when working with workers; or
- use their position to influence a worker for their own benefit.

4.2 If you already know a worker personally, for example as a family friend, tell the DSL. You must not be involved in offering them assignments, reviewing their reports or approving their pay.

5. In-person sessions

5.1 For in-person focus groups and any other in-person session:

- at least two TRUE adults are present at all times;
- sessions take place in open or public venues, never a private home or hotel room;
- workers sign in and out, and the session lead knows who is present;
- workers are never photographed, and audio or video recordings are made only with Schedule 3 consent, on TRUE devices; and
- any incident is reported to the DSL the same day.

5.2 A parent or guardian may come with a worker under 18 and wait nearby.

6. Data and devices

6.1 Worker data stays in Staffwise and TRUE systems. Do not download it to personal devices, print it unnecessarily, or share it outside TRUE.

6.2 Photos, videos and recordings of workers are stored only in TRUE systems and deleted as the Worker Privacy Notice sets out.

6.3 Lock devices when not in use and report any lost device or data breach to a director straight away.

Part B: Clients

7. Who this applies to

7.1 Part B applies to every brand and retailer that commissions TRUE, and to their staff, agencies and store teams. It forms part of TRUE's Client Terms.

8. Briefing and contact

8.1 All briefs, questions and changes go to TRUE, never to workers. Clients and store staff must not:

- brief, instruct, contact or message a TRUE worker directly;
- ask a worker for their name, contact details, school or social media; or
- try to find out who a mystery shopper is.

8.2 Clients receive findings, scores and content as agreed in the brief. They do not receive workers' contact details. Images, voice or video are shared only where the worker and, if under 18, their parent or guardian have consented.

8.3 Clients must not recruit or engage a TRUE worker directly for 12 months after their last TRUE assignment for that client, unless TRUE agrees in writing. Client staff who observe a focus group, in person or online, first get a short briefing from TRUE on their legal and ethical duties and sign an observer agreement. If a worker asks TRUE to pass a complaint to the client, TRUE agrees the wording with the worker and passes it on.

9. When workers are on your premises

9.1 TRUE workers are members of the public while on an assignment. Store staff should treat them as any other customer.

9.2 If store staff think someone is a mystery shopper, they must not challenge, follow, photograph or question them. Contact TRUE instead.

9.3 Clients must:

- never ask a worker under 18 to buy, handle or test an age-restricted product;
- never take a worker into a private or staff-only area;
- keep their premises safe for customers; and
- report any incident involving a TRUE worker to TRUE the same day.

10. Independence

10.1 TRUE's insight is valuable because workers are independent. Clients must not:

- offer workers money, gifts, discounts or incentives outside what TRUE provides;
- try to influence a worker's feedback; or

- publish worker feedback or content as a customer review, testimonial or advert.

10.2 Insight assignments and any promotional or activation work are kept separate. The same worker is never paid by TRUE to promote a brand they are assessing.

11. Safeguarding cooperation

11.1 Clients must cooperate with any safeguarding referral, police enquiry or LADO process involving their staff or premises.

11.2 If TRUE has a safeguarding concern about a site or a member of client staff, TRUE stops sending workers there until the DSL is satisfied it is safe, and tells the client after taking advice.

Part C: Breaches and review

12. Breaches

12.1 Staff report any breach of this Code, by themselves or anyone else, to the DSL or a director the same day.

12.2 A breach by staff may lead to removal from contact with workers, disciplinary action or ending their contract. Serious breaches are referred to the LADO or the police.

12.3 A breach by a client may lead to TRUE pausing work at the site, or ending the contract.

13. Signing and review

13.1 Staff sign this Code digitally before any contact with workers, and again each year with their safeguarding training. Clients accept Part B as part of the Client Terms.

13.2 This Code is reviewed every year, and sooner if the law or TRUE's activities change.

Version	Approved by	Approved on	Next review
1.0	**Victoria Phillips, Director**	**3 November 2026**	**November 2027**