



Oxford
International
Education Group

Employee Code of Conduct

December 2021

Introduction

Our Employee Code of Conduct has been created to help you understand our core values and the behaviours expected to support them. It provides guidance and support for every Oxford International employee and colleague worldwide, with high standards of ethical behaviour and compliance with local laws and regulations being essential to protecting the reputation and long-term success of our business.

We must constantly live up to our values so our clients, students, stakeholders, suppliers and colleagues are confident they can put their full trust in us. As a global business we operate in a complex network of law, regulation and policy. Local laws or policies always prevail when they are stricter than this Code. If you are in any doubt about the meaning or applicability of a rule or regulation, please seek advice from your line manager or the HR team.

YOUR COMMITMENT TO THE CODE

Every Oxford International employee and colleague must comply with this Code. You must take time to read and understand this document. If you have any questions you should speak to your line manager or contact the HR team.

LIVING UP TO OUR VALUES

We take great pride in having established a culture that is based upon our core values. Our working ethos is passionate, caring and focused on delivering great results for our students and stakeholders. Our values are more than just words – they lie at the heart of what we do and how we work.

Our Core Values



YOUR RESPONSIBILITIES

Everyone at Oxford International has particular responsibilities related to their roles but across the Group everyone should:

- Act with integrity
- Show courtesy and respect to colleagues, students, clients, and all stakeholders
- Promote and role model ethical behaviour and business conduct
- Promote an environment where colleagues feel confident in raising ethical concerns and that they will be seriously and followed-up



ZERO TOLERANCE

This Code gives guidance for certain situations but we have a zero tolerance policy with regard to the following:

- Unsafe, illegal or unethical working practices
- Violence and aggression
- Discrimination, bullying and harassment
- Bribery and corruption
- Retaliation against anyone who speaks up and does the right thing

WHISTLEBLOWING

What is whistleblowing?

Oxford International values its reputation and is committed to maintaining the highest level of ethical standards. The actions and conduct of employees and colleagues are key to maintaining these standards. Whistleblowing is the reporting of suspected wrongdoing at work by an employee, the Group or a supplier or business partner. The purpose of our whistleblowing policy is to help you speak up in situations where you suspect dangerous, illegal, harmful or fraudulent activity is taking place, or when you think your colleagues are being treated unfairly.

Who should I speak to?

If you have an issue with a colleague, you should initially discuss the matter with them. If this is not possible, you should speak to your line manager or a member of the HR team. If it is not possible to talk to any of the above, use our whistleblowing service by writing to youtmatter@oxfordinternational.com

Am I doing the right thing?

“I’m worried about being penalised for speaking up.”

If you suspect wrongdoing you should always report it. If you experience any retaliation or harassment as a result of your action, we will investigate and take appropriate action against the harasser, in accordance with our HR policies and procedures. It can be difficult to decide whether a particular action falls within the procedures and it may be that when concerns are investigated, it will be appropriate to address the through other more specific procedures such as the Grievance Procedure.

False, vexatious or malicious claims

If an employee raises malicious, vexatious or knowingly untrue concerns in order to harm colleagues, they will face disciplinary action. This could result in dismissal unless they can demonstrate a reasonable belief that the concern was raised in the public interest.



CHILD SAFEGUARDING AND WELFARE

Many of our students are under 18 and therefore children and Oxford International is committed to safeguarding and promoting the welfare of children. Every employee is responsible for safeguarding and the welfare of the young students in our care and to adhere to our Safeguarding and Child Protection Policy.

If any employee has a concern about a child, they should inform one of the Designated Safeguarding Leads. The Group's Designated Safeguarding Lead is Robin Fry (rfry@oxfordinternational.com). The Group's Deputy Designated Safeguarding Lead is Laura Guga-Voyce (lgugavoyce@oxfordinternational.com).



WORKPLACE SAFETY

We work to ensure the workplace safety of our employees, colleagues candidates and clients. We expect all our employees and colleagues to play their part in making Oxford International safer and ensuring their team has the right equipment, training and knowledge to guarantee a safe working environment.

Am I doing the right thing?

- Ensure you know who the First Aiders are for your building
- Be aware of the work you are undertaking and the hazards associated with it
- Look out for your own safety and others around you
- Report any accident, near miss, injury, ill health or unsafe condition so appropriate action can be taken
- Ensure you are properly trained for the work you are doing
- Familiarise yourself with your building's fire extinguishers, fire exits and emergency evacuation procedures

If you think something is unsafe, don't do it. Speak to your line manager or the Compliance and Facilities team (lgugavoyce@oxfordinternational.com).



DIVERSITY, EQUALITY AND INCLUSION

We promote a diverse, inclusive and equal workplace both internally and externally. Every employee and colleague is expected to treat everyone with whom we have contact with dignity, courtesy and respect.

At Oxford International we treat our employees, colleagues, candidates, clients and business partners fairly and on merit. We hire, promote and reward our employees and colleagues based on their capabilities and skills. Sex, gender reassignment, race (including colour, nationality, and ethnic or national origin), marital and civil partnership status, age, disability, sexual orientation, pregnancy and maternity, political or religious belief are not relevant to personal and team performance at work.

Our employees and colleagues have the right to work in a safe environment free from discrimination, bullying or harassment. We support and uphold human rights principles and international standards. We will not tolerate, engage in or support the use of, forced or child labour. This expectation extends to all our business partners and suppliers, and is specifically reinforced in Oxford International's Suppliers Code of Conduct.

BULLYING AND HARASSMENT FREE WORKPLACE

Every Oxford International employee and colleague has the right to a working environment free from all forms of harassment and intimidation.

We recognise that being a global firm means operating in many countries with differing laws. We are sensitive to these and to cultural and social differences. However, our principles are universal and are reflected in the laws of every country in which we operate. We have a zero tolerance approach to harassment and intimidation.

Bullying and harassment may be against one or more people and may involve single or repeated incidents across a wide spectrum of behaviour, ranging from extreme forms of intimidation, such as physical violence, to more subtle forms such as ignoring someone. It can occur without witnesses, in face-to-face interactions, as well as online.

Bullying and harassment are unwanted conduct which is reasonably considered to have the purpose or effect of:

- Violating the recipient's dignity
- Creating an intimidating, hostile, degrading, humiliating or offensive environment for the recipient

Examples include:

- Unwanted physical contact
- Unwelcome remarks about a person's age, dress, appearance, race or marital status, jokes at personal expense, offensive language, gossip, slander, sectarian songs and letters
- Posters, graffiti, obscene gestures, emblems and flags
- Isolation or non-cooperation and exclusion from social activities
- Coercion for sexual favours
- Pressure to participate in political/religious groups
- Personal intrusion from pestering, spying and stalking
- Shouting
- Persistent unwarranted criticism
- Personal insults



SEXUAL HARASSMENT

Sexual harassment is unwanted behaviour of a sexual nature. The law protects the following people against sexual harassment at work:

- Employees and workers
- Contractors and self-employed people hired to personally do the work
- Job applicants

To be sexual harassment, the unwanted behaviour must have either:

- Violated someone's dignity, whether it was intended or not
- Created a hostile environment for them, whether it was intended or not

Anyone who sexually harasses someone at work is responsible for their own actions. Sexual harassment can happen to men, women and people of any gender identity or sexual orientation. It can be carried out by anyone of the same sex, a different sex or anyone of any gender identity.

EMPLOYER AND EMPLOYEE RESPONSIBILITIES

As an employer, the Group will do all it can to try to prevent bullying, harassment, discrimination and victimisation happening in the first place.

Equally, all employees and colleagues have a responsibility to behave in ways which support an inclusive and tolerant working environment. Everyone should play their part in making the Group free from bullying and harassment.

Management will retain the right to manage the performance and the conduct of employees in a way that is fair but robust. Reasonable management directions should not be construed as bullying or harassment.

SUSTAINABILITY

We believe that developing a sustainable business is not only the best way to help look after our environment, but also contributes to delivering a successful and ethical group. We have a responsibility to look after it. For our students, colleagues, partners and clients this can be an important issue as an increasing number seek to do business only with companies who have a clear understanding of their impact, and have policies in place to try and reduce their impact.

What can I be doing?

You can be mindful of the impact on the environment as you undertake your day-to-day work. Think about opportunities for recycling or cutting down on the amount you print each day. Also consider whether a conference call could be a potential alternative to an off-site internal meeting.



DRUGS AND ALCOHOL

Oxford International is a drug-free workplace. While at work and attending business-related activities in any location you are strictly prohibited from using or being under the influence of alcohol or illegal drugs. From time to time the Group may organise events where alcohol is served. Similarly, you may, as part of your role, invite clients for drinks or dinner where you will want to order alcohol. If you are drinking, you are always expected to drink responsibly at these events.

SMOKING

Smoking is not allowed in any of the Group's workplaces including in any vehicles used by the Group. This applies to e-cigarettes. Smokers must go outside to smoke either in designated area (where these have been provided) or in an area where smoking will not be a nuisance to non-smokers. This policy applies to events organised by the Group outside of the usual working hours.

BRIBERY AND CORRUPTION

Oxford International operates a zero tolerance policy to bribery and corruption. We do not offer or accept bribes or improper inducements, including facilitation payments, to secure business or to gain any advantage for either the Group or for any individual. We expect you to comply with all bribery and corruption-related legislation and to take all reasonable steps to ensure everyone you work with does the same.

GIFTS AND HOSPITALITY

Maintaining high quality professional relationships with our clients and candidates is essential to the success of our business. Sometimes we provide or receive business courtesies, such as reasonable entertainment and modest gifts. However, we never allow these courtesies to affect our ability to make objective, professional decisions or give the perception that our objectivity has been compromised. Refer to the Group Anti-Bribery and Corruption Policy for what is or is not acceptable.

CONFLICTS OF INTEREST

We avoid conflicts of interest. Always act in the best interest of Oxford International. Don't let your personal interests conflict – or appear to conflict – with the Group's interests. Even the perception of a conflict of interest can damage our business and reputation. This happens when your personal interests could affect your judgement and conflict with The Group's interests. Conflicts of interest can arise in many situations. Where requested, you should always disclose your interest to your line manager and remove yourself from the decision-making process.



RELATIONSHIPS WITH SUPPLIERS

Responsible and trusted relationships with our suppliers are critical to the success of our business. We work hard to ensure our partners share our responsible values and that we, in turn, treat them with trust and transparency. Oxford International's Suppliers Code of Conduct sets out our expectations of all our suppliers and our relationship with them.

PROTECTING OUR ASSETS

We each have a duty to look after and respect all of Oxford International's assets. Namely, our place of work, computer and telephone, finances or supplies you may have access to and even our working time.

We should protect Oxford International's assets from misuse, theft and waste. We must also ensure other companies cannot gain an unfair advantage by accessing important information about our business.

You should:

- Use Group resources responsibly and appropriately
- Ensure hardware, such as laptops, phones and other handheld devices, are never left in public or insecure places
- Ensure that all sensitive, confidential and personal information you may handle stays secure
- Ensure business expenditure is accurately and honestly accounted-for

INFORMATION MANAGEMENT AND SECURITY

Information is one of our most valuable assets. We must do all we can to protect it. We must demonstrate to our employees, colleagues, students and clients that we handle their information with care and integrity. Information has many forms from email, databases, voicemail and websites through to paper-based communication, photos and videos. Whatever its format, information and passwords must always be appropriately protected.

DATA PROTECTION

The very nature of our business means we handle personal and confidential information about our employees and students every day. We have an important duty to respect this information and ensure it is protected and handled responsibly and only used for the purposes for which it is provided.

Please refer to our data protection policies that are available on the Group intranet. We take our obligations under data protection and privacy laws across the world very seriously. You must always:

- Only use personal information for the business purpose for which it was supplied (for example: the hiring of a new employee or enrolling a student)
- Ensure personal information is secure at all times and is relevant, accurate and kept up to date
- Ensure that arrangements are in place to comply with data protection legislation
- Complete all training related to data protection compliance as it is assigned to you and by the required deadline(s)



COMMUNICATION WITH THE OUTSIDE

Any communication with external stakeholders, such as our students, agents, university partners, accrediting bodies or even the media, must be clear and truthful. We urge you to take care when using social media and email. Remember that once you have made a public statement you have no control over what happens to it or who uses it.

All external communication regarding the Group must be delivered via the Group's approved channels and will be subject to line management approval. All communication to the Press must be approved by the Group CEO. Internal communication is equally important as this can easily make it into the outside world. Always be aware that your actual audience might not be the one you intended to address.

FINANCIAL REPORTING AND ACCOUNTING

We have an obligation to our business, investors and partners to ensure that we report openly, honestly and accurately on our business performance. Responsibility for accurate and complete financial records does not rest solely with the Group's accounting employees. All employees involved in approving transactions, supplying supporting information for transactions and determining account classifications have responsibility for complying with our policies. Accurate record-keeping protects our reputation.

You must always:

- Accurately and fairly report all business transactions and performance metrics
- Complete all expense claims accurately and in line with the employee business expense procedure
- Maintain records in accordance with legal requirements

