



Business Code of Ethics

Policy review area	Students and staff
Lead manager	Director
Approval level	Senior Management team
Start date	September 2020
Review cycle	1 year
Next review	August 2021

This Code of Ethics embodies the commitment of EduTrain360 (ET360) to the highest ethical standards in the conduct of its programs and business. All officers and employees are expected to adhere to the principles set forth in this Code.

Definitions

As used in this policy the following words or phrases have the following meanings:

1. **Significant Business relationship:** One in which an officer or employee, or a member of his or her family as defined below, serves as an officer, member, employee, partner, or controlling stockholder or member of an organization that does substantial business with College.
2. **Family:** A spouse, partner, sibling, child, or any other relative if the latter resides in the same household as the officer or employee.
3. **Substantial benefit:** When an officer or employee or member of his or her family (1) is the actual or beneficial owner of more than five percent of the voting stock or other controlling interest of an organisation that does substantial business with College or (2) has other direct or indirect dealings with such an organization from which the officer, employee, or family benefits directly, indirectly, or potentially from cash or property receipts totalling £1,000 or more on a cumulative basis.
4. **Officers:** The Director, Principal, and all department heads.

Annual Certification

All Officers of the College, and all employees who manage other employees or students at the College (“Managers”), shall annually at the time of their performance review **certify by signature** their compliance with this Code of Ethics. The Deans shall take steps to ensure that their faculties are aware of this Code of Ethics. All Managers during at least one staff meeting per year shall distribute a copy of this Code of Ethics and allow ample time for reflection and discussion.

Honest and Candid Conduct

All Officers and employees of the College have a duty to conduct themselves with integrity. Integrity requires that conduct be honest and candid. This Code does not attempt to anticipate every possible situation or to cover every topic in detail. The guiding premise of this Code is that all members of our community should conduct themselves with honesty and integrity and adhere to all legal requirements and to ethical behaviour in all that they do.

Review and Adhere to all College Policies.

All officers and employees of the College have a duty to periodically review all College policies and to adhere to those policies in their work and service to the College and community. In particular, but without limiting this duty, all officers and employees shall annually review the policies of the College that prohibit discrimination, harassment or creation of a hostile work environment, and the procedures for reporting such policy violations.

Conflicts of Interest

It is the policy of the College to ensure that its employees avoid engaging in any activity, practice, or act that conflicts with, or appears to conflict with, the interests of the College. The following is a list of some situations that may create a conflict of interest. This list is not exhaustive and is meant to be illustrative:

- Significant business relationships with, or ownership or control of, any person or firm engaging in, or seeking to engage in, business with the College.
- Utilizing discounts allowed to the College for personal gain.
- Using information that the College considers privileged or confidential for non-College purposes.
- Using the name of the College for personal profit.
- Accepting gifts or any item or service valued in excess of £100 from any person or firm engaging in, or seeking to engage in, business with the College.
- Making or influencing a decision to benefit another employee or their department because of a familial or romantic relationship with that employee.

Procedures:

1. Employees shall disclose any direct or indirect ownership or control of a substantial interest in any other entity participating in a transaction with the College. In the event of any such ownership or control the employee shall not be involved in any decision regarding any business transaction between such entity and the College. No employee may compete with the College or use business opportunities, confidential information, or trade secrets for their personal gain or advantage or the personal gain or advantage of another.
2. The College name, mark, seal, or emblem, or any other trademarks or service marks of the College, may not be used in outside activities without the written approval of the Principal.
3. Employees must notify their supervisor of all facts and circumstances related to any transaction, activity, contract, or other dealings in which they are involved, or may become involved, that might directly or indirectly create a conflict of interest.
4. When a supervisor is notified by an employee of a conflict of interest, or potential conflict of interest, he or she must report the matter to the appropriate dean or vice president who has the authority to act in the interest of the College, subject to the approval of the College Principal.
5. Exempt administrative staff must disclose to their supervisor in writing all secondary employment outside the College.
6. All Officers of the College will fill out a conflict-of-interest disclosure form annually as part of their annual performance review.
7. No employee should enter into any arrangement with any person or firm that provides for a financial benefit or payment to be received by the employee or the College in return for doing business with such person or firm, or in return for providing access for such person or firm to any member or members of the College community.

Confidentiality

In carrying out the College's business, officers or other employees may learn confidential or proprietary information about the College, its students, faculty, or staff, or other third parties. Officers and employees must maintain the confidentiality of all information so entrusted to them, except when disclosure is authorized by the College or legally required.

Protection and Proper Use of College Assets

All officers and employees should protect the College's assets and property and help ensure their efficient use. The College's assets and property should be used for legitimate College purposes only.

Financial Reporting

The Director, Principal and all other employees who are charged with the management or supervision of College's financial affairs shall:

- Become familiar and comply with College procedures and internal controls over financial reporting to the extent relevant to their areas of responsibility, so that College reports and other documents filed submitted, or furnished to regulatory authorities comply, in all material respects, with applicable laws, rules and regulations.
- Provide full, fair, accurate, timely, and understandable disclosures in reports and documents that are filed with, or submitted or furnished to, College auditors or regulatory authorities; and
- Comply in all material respects with all applicable laws, rules, and regulations relative to College's operations.

No officer or employee shall take any action to fraudulently influence, coerce, manipulate, or mislead any person or entity with whom the College does business.

Familial or Romantic Relationships

EduTrain360 recognises the potential for a conflict of interest or the appearance of a conflict of interest when a decision-maker's judgment may be, or may appear to be, influenced by a familial or romantic relationship between employees. These procedures shall be followed to ensure full confidence in the transparent and reasonable evaluation of decisions and to maintain trust in the decision-making process.

1. All Officers with a familial or romantic relationship with another employee of the College shall disclose the existence of the relationship to their supervisor. Any other employee who, by virtue of their position has authority to influence the employment benefits, working conditions or other material circumstances of another employee with whom they have a familial or romantic relationship is required to disclose the existence of the relationship to their supervisor.
2. Employees may not exercise supervisory, appointment, or grievance-adjustment authority over another employee with whom they have a familial or romantic relationship. In the event of the potential for a conflict of interest or the appearance of a conflict of interest in the rendering of some institutional decision by one of the employees in such a relationship, the decision-maker will abstain from the decision and have the decision reviewed and approved by another senior administrator or their supervisor.

Signed: Mr Ibrar Ahmed (Director)

Date: 03/09/2020

Policy review date: 02/08/2021