



## Business Code of Ethics

<b>Policy review area</b>	Staff; Students
<b>Lead manager</b>	Chief Executive Officer and Principal
<b>Approval level</b>	Senior Management Team
<b>Start date</b>	March 2022
<b>Review cycle</b>	1 year
<b>Next review</b>	February 2026

## INTRODUCTION

1. This Code of Ethics embodies the commitment of Acquire Learning College to the highest ethical standards in the conduct of its programmes and business. All officers and employees are expected to adhere to the principles set forth in this Code.

## Definitions

2. As used in this policy the following words or phrases have the following meanings:
  - a. **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 Centre.
  - b. **Family:** A spouse, partner, sibling, child, or any other relative if the latter resides in the same household as the officer or employee.
  - c. **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 the Centre 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.
  - d. **Officers:** The Chief Executive Officer and Principal and all Department Heads.

## Annual Certification

3. All Officers of the Centre, and all employees who manage other employees or students at the Centre (“Managers”), shall annually at the time of their performance review **certify by signature** their compliance with this Code of Ethics. The Heads of Departments 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

4. All Officers and employees of the Centre 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 Centre Policies

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

## Conflicts of Interest

6. It is the policy of the Centre 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 Centre. 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:
  - a. Significant business relationships with, or ownership or control of, any person or firm engaging in, or seeking to engage in, business with the Centre.
  - b. Utilising discounts allowed to the Centre for personal gain.
  - c. Using information that the Centre considers privileged or confidential for non-Centre purposes.
  - d. Using the name of the Centre for personal profit.
  - e. Accepting gifts or any item or service valued more than £100 from any person or firm engaging in, or seeking to engage in, business with the Centre.
  - f. Making or influencing a decision to benefit another employee or their department because of a familial or romantic relationship with that employee.

## Procedures

- a. Employees shall disclose any direct or indirect ownership or control of a substantial interest in any other entity participating in a transaction with the Centre. 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 Centre. No employee may compete with the Centre or use business opportunities, confidential information, or trade secrets for their personal gain or advantage or the personal gain or advantage of another.
- b. The Centre name, mark, seal, or emblem, or any other trademarks or service marks of the Centre, may not be used in outside activities without the written approval of the Chief Executive Officer and Principal.
- c. 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.
- d. 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 Centre, subject to the approval of the Centre Director.
- e. Exempt administrative staff must disclose to their supervisor in writing all secondary employment outside the Centre.
- f. All Officers of the Centre will fill out a conflict-of-interest disclosure form annually as part of their annual performance review.
- g. No employee should enter any arrangement with any person or firm that provides for a financial benefit or payment to be received by the employee or the Centre 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 Centre community.

## **Confidentiality**

7. In carrying out the Centre's business, officers or other employees may learn confidential or proprietary information about the Centre, 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 Centre or legally required.

## **Protection and Proper Use of Centre Assets**

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

## **Financial Reporting**

9. The Chief Executive Officer and Principal and all other employees who are charged with the management or supervision of Centre's financial affairs shall:
  - a. Become familiar and comply with Centre procedures and internal controls over financial reporting to the extent relevant to their areas of responsibility, so that Centre reports and other documents filed submitted, or furnished to regulatory authorities comply, in all material respects, with applicable laws, rules and regulations.
  - b. Provide full, fair, accurate, timely, and understandable disclosures in reports and documents that are filed with, or submitted or furnished to, Centre auditors or regulatory authorities; and
  - c. Comply in all material respects with all applicable laws, rules, and regulations relative to Centre's operations.
10. No officer or employee shall take any action to fraudulently influence, coerce, manipulate, or mislead any person or entity with whom the Centre does business.

## **Familial or Romantic Relationships**

11. Acquire Learning College 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.
  - a. All Officers with a familial or romantic relationship with another employee of the Centre 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.
  - b. 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.

## **Related Policies**

Anti-Bribery Policy

Whistle Blowing Policy

Fraud Prevention Policy