



NORD ANGLIA EDUCATION

Be Ambitious

One Nord Anglia Education

**One Goal:** Acknowledged as the world's leading schools organisation

#### **One Vision:**

Uniting world leading schools to create an outstanding education for every child

#### **One Philosophy:**

Be Ambitious – our shared philosophy which leads to students, parents, and employees achieving more by being part of Nord Anglia Education

#### **One Plan:**

- Provide high quality education 1.
- 2. Deliver personalised learning enhanced by unique global opportunities
- 3. Develop all schools to be First Choice for parents
- Invest in our people and schools to enable continued growth 4.
- Add high quality schools to enhance the 'power' of our family 5.



### Nurture 'One Team'

- We are all part of Nord Anglia Education
- People first everyone valued
- Work collaboratively across functions, regions and schools
- Discipline and Focus engagement with task at hand
- 'Can do' attitude

# wn<sup>•</sup>Be Ambitious'

- Our shared philosophy
- Everyone will achieve more as part of Nord Anglia Education working together we can achieve more than we can individually

# **Nord Anglia values (Undergoing further development)**

- Leadership
- Impact
- Opportunity
- Respect

### eliver Results

- One plan understood by all
- Transparency everyone included and clear on strategy
- Measurable goals student, staff, parents, and investors
- Facts and data deal with reality, not perception
- Trust the process commit to how we do things



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Nord Anglia Education is a global family of schools united by a single philosophy – to be ambitious for our students, our people and our schools. We are committed to offering the best

possible education and believe that being part of our family means that you will achieve more with us than you would individually.

It is vital that we work together as one team to make this a reality. Our philosophy, vision and values should be reflected in the work we do in our schools and offices every day and how we engage with each other, our students and their families, our partners, suppliers and the wider community.

This code of conduct is designed to help us reach the highest standards in all that we do. We have a responsibility to set the right example for our students by conducting our business in accordance with the highest standards of business ethics. Our shareholders, customers, regulators and other important stakeholders, expect nothing less.

It is important to remember that standards of conduct are not just about how we behave when things are going well. None of us is immune from error, and mistakes are bound to happen. How we conduct ourselves in circumstances where we are under pressure or facing challenges is as important as our conduct when things are going well. What is important is how we handle them – acting with honesty and integrity at all times is what will protect us as individuals and Nord Anglia Education and our schools as an organisation.

Our Code of Conduct & Ethics is designed to give you a practical understanding of how to make the right decisions. However, it cannot cover every possible circumstance. Therefore, I urge you to speak up if you have a question or concern about your actions or those of a colleague – sooner rather than later. Many of the issues we face during the course of our work can be easily be resolved if they are reported promptly. Nord Anglia Education will always strive to protect you when you report a concern in good faith.

Please read this Code of Conduct & Ethics carefully and join me in committing to its principles, the values it reflects and the behaviour it outlines. Your commitment will help us continue the pursuit of our vision.

Regards

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Andrew Fitzmaurice CEO, Nord Anglia Education

Introduction and Laying The Foundations

Nord Anglia Education, and each of its schools and subsidiaries (collectively "Nord Anglia Education"), are dedicated to conducting our business in a way that is consistent with the highest standards of business ethics.

We have an obligation to our students, parents and guardians (collectively "parents"), shareholders, customers, suppliers, community representatives and other business contacts to be honest, ethical, fair and forthright in all our business activities. This obligation, together with our vision, philosophy and values, our corporate policies and the laws and regulations to which we are bound create the foundation for this Code of Conduct & Ethics ("Code"). The Code specifies the minimum standards of behaviour to which every employee, director and officer (referred to in the Code collectively as "employees") is expected to adhere.

#### **Ethical Decision Making and Appropriate Behavior**

We recognise that all employees encounter ethical challenges in their work. This Code is intended to help you identify and resolve those challenges. When faced with a decision at work that appears to have ethical overtones, here are several questions you should ask yourself to determine if your actions are proper:

- Am I adhering to the spirit, as well as the letter, of any applicable law or corporate policy?
- Would I want my actions reported on the front page of a newspaper?
- What would my family, friends, children or neighbours think of my actions?
- How would the parent body view my behaviour?
- Will there be any direct or indirect negative consequences for our students, Schools, employees or to Nord Anglia Education itself?
- Are my actions consistent with the overall values set forth in this Code and other Nord Anglia Education policies?
- What specifically am I being asked to do? Does it seem unethical or improper? (Use your judgment and common sense. If something seems unethical or improper, it probably is.)
- Am I in a position of leadership or seen as representative of Nord Anglia Education or my School in the community, which would exacerbate the effect of my actions?

If you remain uncertain about what to do, stop and ask for help.

#### Who Must Follow The Code

The Code applies to all Nord Anglia Education employees, whether full-time, part-time or seasonal. We also expect our significant business partners, consultants and contractors to have similar values and principles and therefore to comply with the "spirit" of our Code. We will not engage with third parties known to operate unethically or without integrity.

Nord Anglia Education is a geographically dispersed organisation, but our global family of schools is united by our philosophy (Be Ambitious) and commitment to delivering the best possible education for our students. Each of us has a responsibility to live by the significant trust that is placed in us.

- Our fellow employees must trust us to value and respect them.
- Our students and parents and guardians rely on our integrity and trust us to deliver on our promises
- Our customers and business partners must trust our professionalism and integrity.
- Our shareholders must trust our stewardship.
- Communities where we are based must be able to rely on us to act as responsible organisational citizens.

Q: We have to achieve our organisational goals in markets with different rules and where others don't seem to have the same ethical standards as we do. Sometimes I feel pressured to violate this Code to achieve these goals. Is this acceptable?

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A: No. While successful organisations often set high goals and strive to achieve them you must never violate this Code or other Nord Anglia Education policies to achieve your goals. If you really feel that business cannot be conducted in your market without breaching this Code, you should speak to someone listed at the "Speak Up – Where to get Help..." section of this Code.

If a waiver of the Code really is justified, it may only be made by those specified under the "Waivers of this Code" section. However, sometimes, just talking over issues with someone, will help you work out ways of proceeding that do not breach the Code.

#### **Responsibilities Under The Code**

#### As employees of Nord Anglia Education, you are required to:

- Follow our policies, guidelines, handbooks and procedures.
- Comply with applicable laws and regulations.
- Participate in compliance and ethics training.
- Demonstrate model behaviour. This means upholding the Code in everything you do and decisions you make, even when you think no one is looking.
- Speak up promptly and report any misconduct or concerns.
- Periodically certify compliance with the Code.

#### **Additional Responsibilities for Managers**

If you are a manager at Nord Anglia Education, with employees reporting to you, you have additional responsibilities:

- Lead by example. Inspire similar behaviour in those who report to you. Never pressure others to compromise the Code.
- Keep an open door. Make yourself available for questions, concerns and to offer guidance.
- Foster a culture of trust and transparency. Make it clear that people must not be afraid to come to you with concerns about ethical behaviour.
- Be watchful. Do not ignore signs of possible misconduct or inappropriate behaviour.

#### Speak Up — Where to get help or advice and report violations of the code

Your line manager, Principal or Headmaster (referred to as "Principal" in this Code) or Head of Department, if you are not working in a school, is the first person you should contact if you have questions about anything in this Code or if you have a problem or if you have observed a violation of the Code (in which case, you have an obligation to report it).

In some cases you may feel more comfortable discussing the matter with someone else. In such cases, there are others at Nord Anglia Education you can talk to. You may contact your local Human Resources professional or any of the following on a confidential basis for the purpose of discussing any issue related to the Code:

#### **Group Compliance Officer**

Tel: +852 3951 1186 **E-mail:** compliance@nordanglia.com



Nord Anglia Education's Ethics Hotline (independently managed by Lighthouse Services): Website: http://www.lighthouse-services.com/nordanglia

**Toll-Free Telephone:** For a list of all telephone numbers please go to the [Whistle Blower Protection Policy] or see the posters placed in your school.

E-mail: reports@lighthouse-services.com (please include School or Company name with report)

Fax: +1 (215) 689-3885 (please include School or Company name with report)

The written options above would allow you to report in your own language, if you wish, and you may remain anonymous if you wish (except where the local laws where you are based won't permit anonymous reports). We do ask you to provide as much detailed information as possible, as this will help us thoroughly assess and/or investigate the matter.

#### **Confidentiality and Non-Retaliation**

Nord Anglia Education will take all reasonable steps necessary to protect the confidentiality of information relating to alleged misconduct to the maximum extent possible, consistent with our legal obligations, including the need to carry out a proper investigation. We also have a policy of ensuring that there will not be any retaliation against someone for reporting suspected misconduct or violations of this Code, as long as the report has been made in good faith (and even if it turns out the reporter was mistaken). For more information, please see Nord Anglia Education Whistle Blower Protection Policy on the Intranet.

#### Discipline

Violations of the Code will not be tolerated. Any employee who violates the standards in the Code, or encourages others to do so, may be subject to disciplinary action, which, depending on the nature of the violation, may range from a warning or reprimand to and including termination of employment. In appropriate cases, Nord Anglia Education may take civil legal action or refer a matter to applicable authorities for consideration of regulatory or criminal prosecution. All violations will be addressed in accordance with the disciplinary processes set out in our Disciplinary Policy.

## A Workplace to Be Droud Of

Nord Anglia Education believes that outstanding people are vital to creating outstanding schools. We encourage the continuous professional and personal development of all our people and honour the law and regulations that protect their health, safety and wellbeing.



#### Workplace Equality and Diversity

At Nord Anglia Education, we strive to provide a positive workplace where all individuals may grow, contribute, and participate in our success. Each of us is responsible for creating a workplace where everyone is treated with honesty, dignity, fairness and **respect**. We are committed to making sure that every person has an opportunity to succeed and to contribute to the overall success of our organisation.

Nord Anglia Education prohibits discrimination because of gender, disability, race, age, or any legally protected personal characteristic.

Nord Anglia Education shall implement its commitment to workforce equality and diversity consistent with all relevant and applicable local laws. You can address any concerns regarding this policy to your supervisor or Human Resources professional.

#### **Harassment - Free Environment**

Unwelcome, inappropriate, insulting, intimidating, or offensive remarks or actions have no place in a Nord Anglia Education school or workplace and will not be tolerated. To maintain a workplace free from harassment, each of us must exercise good judgment in our relationships with our co-workers, students, parents, suppliers, and visitors. If you experience or observe harassment in the workplace or school environment or other improper conduct, you should report the incident as indicated in the "Speak Up…" section above.

#### Workplace Violence and Promotion of A Safe and Secure Work and School Environment

Nord Anglia Education promotes a safe and secure workplace and does not tolerate violence in its schools or workplaces, including threats, threatening behaviour, harassment, intimidation, assaults, and similar conduct.

You are responsible to promote a safe and healthful work and school environment. You must immediately report any threats or concerns about your safety or the safety of others to your supervisor.

You may not carry firearms or other weapons on any Nord Anglia Education facility unless this has been previously authorised in writing by the Principal and is for security reasons.

#### Alcohol and Drug Use

Using, selling, possessing or working under the influence of illegal drugs at any Nord Anglia Education school or other office or workplace is prohibited.

Q&A

Q: My supervisor and some of my colleagues tell jokes in my presence with sexual overtones that I find offensive. I have not complained because I think they will tell me to mind my own business or that I'm being overly sensitive for no reason. Would they be right?

A: No, they would be wrong. Offensive jokes of a sexual nature can sometimes be a form of harassment. First, you might try to talk with your supervisor and colleagues. If this does not work, or if you think doing so may subject you to retaliation or other problems, talk to a Human Resources representative or others listed in the Speak Up section of this Code.

Warning Signs – Harassment

- Unwelcome gestures or physical contact
- The display of sexually explicit or offensive pictures or other materials
- Sexual or offensive jokes or comments (explicit or by innuendo)

#### **Respecting Others**

- Provide employees with opportunities based on performance and requirements that are relevant to job performance.
- Abide by local labour and employment laws, including those addressing discrimination and harassment.
- Provide a work environment free of harassment.
- Escalate concerns you may have regarding your workplace environment - see the "Speak Up" section for reporting options.

All Nord Anglia Education schools are drug and alcohol-free work environments and employees should not be under the influence of alcohol while on school premises. Limited exceptions permitting moderate alcohol use at certain marketing and celebratory events (i.e. parents' cheese and wine evenings or school fundraising events) are permitted with the approval of the relevant Executive Committee member and after ensuring adequate controls to prevent access to alcohol by students or other underage persons.

For employees of non-school businesses or offices, excessive or inappropriate use of alcohol whilst engaged in work related activities for Nord Anglia Education is prohibited.

Employees who feel they have an alcohol or drug abuse problem may contact their supervisor or Human Resources professional for support.

#### **Employee Privacy**

Nord Anglia Education respects the personal information and property of employees. Employees expect us to carefully maintain the personal information they provide to us. Your trust must not be compromised by disclosing this information other than to those with a legitimate need to know.

Access to personal information or employee property is only authorised for appropriate personnel with a legitimate reason to access such information or property. From time to time, the organisation may, applicable laws permitting, access and monitor employee Internet usage and communications to assess compliance with laws and regulations, our policies and ethical standards. Subject to local laws, employees shall have no expectation of privacy with regard to workplace communication or use of organisation information technology resources.

Q: I overheard my manager discussing with other colleagues some private information contained in a co-workers medical records. What should I do?

A: Medical information of employees is strictly confidential. Inappropriate sharing of such information is a violation of Nord Anglia Education policy and a breach of trust. You should raise this with the appropriate management personnel. If you are uncomfortable raising this with management, refer to the Speak Up section for reporting options.



# Shaping and Upholding Ethical Dractices in Our Schools

Nord Anglia Education is ambitious for our students, our people and our family of schools. We are committed to offering the best possible education and so seek to create valuable opportunities for our students, parents, people and schools. We will only do so through legal and ethical practices, never losing sight of our focus on our students' and employees' interests and well-being.



#### **Engaging With Our Students**

Nord Anglia Education recognises its responsibility for safeguarding all students under the UN Convention on the Rights of the Child (1989), Article 19 which states that children should be protected from all forms of violence and have the right to be protected from being hurt and mistreated, physically or mentally.

Everyone who comes into contact with one of our students in our schools must understand:

- A child's welfare is paramount and each child has the right to be protected from harm and exploitation and to have their welfare safeguarded
- All children need to be safe and feel safe in school
- Every child is entitled to a rich and broad curriculum that equips them to keep themselves safe
- Every adult in school must have a commitment to protecting children with/for whom we work.
- We work in partnership with parents / carers and/ or other professionals to ensure the protection of children.
- Our guiding principle throughout is that of 'the best interests of the child'

All staff working directly with children in our schools must:

- Be familiar with the Nord Anglia Education safeguarding policy
- Be familiar with additional local safeguarding regulations and procedures
- Be subject to recruitment processes and checks prior to starting at the school (unless an action plan is in place to ensure staff member is supervised until the check is passed)
- Be alert to signs and indicators of possible abuse
- Listen to and take seriously the views of children
- Record any concerns and report these to the Designated Safeguarding Officer

- Take positive steps to ensure the protection of children who are the subject of any concerns
- Support children, staff or other adults who raise concerns or who are the subject of concerns to act appropriately and effectively in instigating or co-operating with any subsequent process of investigation.

#### All non-direct contact adults must:

- Undergo a safeguarding briefing in relation to their role
- Be subject to recruitment processes and checks prior to starting at the school (unless an action plan is in place to ensure staff member is supervised until the check is passed)

For further information please see the Safeguarding and Child Protection Policy

#### **Being Role Models For Our Students**

If you work in a school, particularly in a teaching or professional capacity, you occupy an important role model position that has the potential to significantly impact the lives and development of our students. We are committed to ensuring all our students thrive, supporting them to achieve more than they may have thought possible. For that, role models, particularly those that play such a critical and active part in the lives of our students during their



formative years, must set the right example in terms of honesty, ethics, integrity and acceptable social behaviour. The need to set an exemplary example extends beyond your time on school premises and impacts how you should engage socially and publicly in the community. Therefore, you should consider, before engaging in activities that, although technically legal, might not be considered ethical or an appropriate example to set for our students, how such behaviour might be perceived by students, parents and the community. If this is likely to be negatively, you should reconsider, rather than damaging your position as a positive role model to our students. All staff should be aware of the following:

- Exercise caution when using social media
- Be aware of conduct both inside and outside of work as we are all role models to our students
- Employ recognised safe practice when working alone with students
- Avoid intimidating and threatening behaviour towards students and staff
- Be aware of the language we use around students e.g. profanities or sexual
- Show discretion when touching others, especially students
- Do not communicate with minors outside the confines of your professional role
- When communicating with students via email always use your organisation email account
- Communication with minors via social media may only be in relation to school business

Q: I have a niggling feelings about the well-being of a student based on subtle changes of his behaviour over the last few months and, well, really my gut. I have nothing substantial to point to at the moment. When do I need to report a concern?

A: Immediately, report this to your Safeguarding Officer who can assess with you to see whether there are grounds for your concerns and what action should be taken.

#### **Reporting of Child Abuse or Neglect**

The protection of our students from harm is of utmost importance to Nord Anglia Education and our family of schools and each school is required to implement a comprehensive program designed to secure the safety and wellbeing of our students while they are in our care. Reference should be made to the Nord Anglia Education Safeguarding and Child Protection Policy on the Intranet.

In addition, school personnel play a critical role in the lives of children, especially since they observe and interact with them on a daily basis. Most locations where we operate have regulation or laws that require school personnel to report child abuse, neglect or maltreatment.

Our job is not to determine whether or not abuse or neglect has occurred. If child abuse or neglect is reported to, or **suspected by you**, you MUST act. If you suspect or receive information that a student may be abused or neglected, you must comply with your local regulatory reporting obligations which likely will require you to make an immediate report of the matter to the applicable agency. **You should immediately contact the senior person nominated as School Safeguarding Officer and/or the Principal and they will walk you through the correct process for your School**.

If at any time you are unsure of your obligations with respect to reporting of suspected cases of child abuse and/or neglect, you should contact your School Safeguarding Officer or Principal or Regional Managing Director who will share the appropriate information applicable to your responsibility in the location in which you work.

If you discover child pornography on electronic and information technology equipment, you should immediately report it to your School Safeguarding Officer or Principal.



Q: I took on-line Child Protection training when I joined. How often do I have to complete the training?

A: Ongoing training is important to ensure all of us are equipped and alert to current child protection issues and tools. The Nord Anglia Education policy is that training for all staff should be completed every 2 years.

#### **Student Records and Privacy**

School student records are confidential and information from them shall not be released other than as provided or required by Nord Anglia Education policy or applicable law. The information contained in school student records should be kept current, accurate, clear, and relevant. School student records, information contained in school student records, and other specific information related to individual Nord Anglia Education school students, should only be shared with other Nord Anglia Education employees who have a legitimate educational interest in the information.

If student biometric information is maintained or collected for purposes of identification or fraud prevention, it shall be stored and transmitted in a manner that protects it from disclosure.

Employees who handle student or parent information are responsible for knowing and complying with applicable information privacy and information security laws. In all cases we must maintain appropriate physical, administrative and technical safeguards for personal information and business data. For more information, if applicable please contact your local data protection officer or a member of the Legal or Compliance team.

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Q: If I move to another Nord Anglia Education school will I need to redo the Child Protection training?

A: No, the training is transferable between Nord Anglia Education schools, but if you feel you need a refresher at any time, let us know and we can arrange it.

# Shaping and Upholding Ethical Practices in Our Markets

Nord Anglia Education is ambitious for our family of schools and want each of our schools to be the first choice for parents in its location. We are prepared to compete vigorously in the markets where we choose to do business, however, we only seek to create competitive advantages through legal and ethical practices.



#### **Conflicts of Interest**

Avoiding actual or apparent conflicts of interest creates and sustains the trust of our students and their families, employees, business partners, shareholders and the public. Therefore, employees, consultants, agents and representatives must endeavour to avoid actual or potential conflicts of interest. Nord Anglia Education understands and respects employees' rights to engage in activities outside of their jobs. These activities, however, should not divide your loyalties.

A conflict of interest exists when a person's private interest interferes in any way with the interests of Nord Anglia Education and/or its schools or other businesses. A conflict can arise if you take an action or have an interest that may make it difficult for you to perform your work for Nord Anglia Education objectively and effectively. Conflicts of interest may also arise when you, or members of your family, receive improper personal benefits as a result of your position with Nord Anglia Education.

Conflicts of interest can occur in any Nord Anglia Education occupation. They may occur if a Nord Anglia Education employee makes a decision on behalf of the organisation or has a financial interest in an organisation that wants to do business with us.

**Examples of Potential Conflicts include:** 

- Hiring a family member, close friend or your parent, without proper disclosure and approval.
- Tutoring students of your school for compensation after hours without the knowledge or permission of the Principal.
- Furthering, managing, or entering into a contract with a supplier owned (even partially) and/or managed by a close friend, family member or parent.

- Having a significant financial interest (ownership or otherwise) in, or obtaining a loan or guarantee or personal obligations from, any company that is a Nord Anglia Education supplier, customer or competitor. A "significant interest" would include an interest of just 1% or more of the equity of the company in question or an investment representing more than 5% of your total assets.
- Accepting an expensive gift from the parent or guardian of a student you teach (see "Gifts and Entertainment" section)
- Working independently as a consultant to a supplier or customer.
- Having a private business on your own time if you perform work that is similar to work that you perform at Nord Anglia Education or that Nord Anglia Education might be interested in performing.
- Serving on a board of directors or trustees or on a committee of any entity (profit or non-profit) whose interests reasonably would be expected to conflict with those of the organisation, including charities or volunteer bodies in the field of education.

Conflicts of interest may not always be clear, so if you have a question, you should consult with your supervisor or Principal.

If you consider undertaking any activity, including an investment, that reasonably could be expected to give rise to a conflict of interest, you should disclose this to your supervisor. No action may be taken with respect to such activity unless and until such action has been approved. If you are in doubt as to whether the circumstances might be reasonably expected to give rise to a conflict of interest, then you should always disclose.

If you become aware of a conflict of interest or potential conflict of interest, you should bring it to the attention of your supervisor or the Principal or, if circumstances warrant (for example, where the matter might potentially cause significant reputational or financial damage to the school or organisation if not properly dealt with, or if it involves a member of the senior leadership team at a school or business), the relevant Nord Anglia Education Regional Managing Director responsible for your school or business or the Nord Anglia Education Executive Committee member responsible for your function.

#### **External Opportunities**

Employees, officers and directors have a duty to advance the legitimate interests of Nord Anglia Education when the opportunity to do so arises. Generally, employees, officers and directors are prohibited from using our organisational property, information or position for personal gain or to compete with Nord Anglia Education. More specifically, employees are prohibited from taking for themselves (or directing to a third party) a organisational opportunity that is discovered through the use of organisational property, information or position unless, after full and fair disclosure, the opportunity has been offered to and rejected by Nord Anglia Education.

You should disclose to your line manager full details of any such external opportunity that you wish to pursue and the Nord Anglia Education Regional Managing Director responsible for your school/ business or the Nord Anglia Education Executive Committee member responsible for your function should be consulted for approval. You may only proceed to pursue the opportunity if advised that the organisation has waived its right to pursue it, and subject to the ethical standards set out in this Code.



#### **Gifts and Courtesies**

This refers to gifts or services (whether in money or in kind) provided to or received from a business associate. In certain situations, limited, non-cash business courtesies may be appropriate. However, Nord Anglia Education, its schools and employees, will not seek to improperly influence the decisions of our parents and students, customers, suppliers, or fellow employees by offering extravagant or otherwise inappropriate courtesies, nor do we accept such courtesies from suppliers. Nord Anglia Education employees and their family members are generally not permitted to accept any courtesy or other benefit of any type (this includes meals, entertainment e.g., golf outings, and tickets) regardless of value that is offered in connection with Nord Anglia Education business.

The limited exceptions to this general prohibition are as follows:

Employees may accept or provide, if authorised by Nord Anglia Education or school management:

- Limited refreshments and meals, such as coffee, pastries and a working meal, when these items are provided during a business meeting.
- Reasonable and infrequent meals and entertainment (but not travel or overnight lodging) when offered for a legitimate business reason and when local custom or practice would make it inappropriate to decline the offer.
- Gifts of nominal or small value (under US\$50 or its equivalent), although discouraged (this includes gifts to teachers from parents).

All gifts given or received over \$50USD must be approved by your line manager and placed on your school, regional or central gift register.

You must be careful that gifts and courtesies are not construed as bribes, kickbacks or other improper payments. In addition, many governments have laws and regulations regarding offering business courtesies to government officials, or offering courtesies to, or receiving courtesies from subcontractors on a government contract. Laws in various locations differ. Consequently, Nord Anglia Education prohibits the offering or providing of anything of value to any government official, employee, politician and/ or their staffs, unless it complies with the restrictions set out in the Nord Anglia Education Anti-Corruption and Bribery Policy (If you are located in Vietnam the Anti-Corruption and Bribery Policy Vietnam specific) and is reviewed and approved for appropriateness and legality in accordance with the Policy. See "Bribes and Other Improper Payments" section of this Code.

Gifts between Employees - Employee recognition and reward are important to Nord Anglia Education and its Schools. Where Nord Anglia Education funds are used in support of these activities the following restrictions apply:

- All such activities and gifts should be approved by management.
- Costs of the events and gifts should be appropriate to the nature of the activity.
- Extravagant or lavish gifts or events should be avoided and need to be approved.
- Nord Anglia Education funds may not be used to purchase personal gifts between individual employees (e.g. retirement, birthday or holiday presents).
- Employees may not use their own or Nord Anglia Education funds to support activities or purchase gifts intended to influence management decisions.

#### **Supplier Selection**

We rely on suppliers, contractors, and consultants to help us accomplish our goals. They are part of the Nord Anglia Education team and should be treated according to our values and in an ethical manner.

We will not hire a family member, close friend or parent of a student as a supplier, contractor or consultant, without the prior approval of the relevant Nord Anglia Education Regional Managing Director, Group Human Resources Director or CEO, as appropriate.

We should base all procurement decisions on the best value received by Nord Anglia Education, taking account of price and non-price factors including quality, performance, and suitability.

We should use the following procedures in procurements:

- Ensure adequate transparency in relation to any procurement process, including, for contracts or supply needs with significant value, preparing and publicly advertising a statement of Nord Anglia Education's or our schools' needs and the factors Nord Anglia Education or the school will consider in selecting a supplier;
- Obtain competitive bids from at least three suppliers for significant contracts over applicable thresholds as set out in the Nord Anglia Education Procurement Process and other relevant corporate procurement policies;

- Confirm the legal status of all bidders and that they are financially responsible;
- Verify the quality and service representations made in the bids;
- Make sure that purchase agreements clearly state the services or products to be provided, the price and delivery terms, and the basis for earning rebates or fees, if applicable;
- Verify that invoices clearly and fairly represent the goods and services delivered.

Nord Anglia Education will make payments only to the person or the firm that actually provides the goods or services. Payments to agents or sales representatives may not be made without prior approval from the Nord Anglia Education Regional Managing Director or Chief Financial Officer, as appropriate. Nord Anglia Education will not knowingly use suppliers who participate in the following activities:

- Supply unsafe products or services;
- Pay bribes to facilitate business;
- Do not comply with all applicable laws or regulations;
- Use child labour or forced labour;
- Engage in human trafficking; or
- Use physical punishment to discipline employees, even if it is allowed by local law.

Q&A

Q: I am a teacher in a country where gift giving during the festival season is customary. I have been given a Prada handbag (worth about US\$2000) from a parent of one of my students as a new year's gift and know it would be rude to refuse it. I'm happy to declare it, but think I should be able to keep it. It's not going to influence the way in which I deal with the Parent in question or her child, so I don't see any harm in doing so.

A: Accepting expensive gifts can cause reputational damage for your School / Nord Anglia Education, even where there is a mere perception of conflict of interest. You may not intend to let the gift influence the way in which you deal with the relevant Parent or his/her child. However, people may assume that such a lavish and expensive gift will influence you. It's best not to have to have to justify or prove that your actions / decisions as a teacher haven't been unduly influenced. In addition, the value of this gift far exceeds the maximum threshold set by this Code.

You should talk with your supervisor and/or the Principal to see the best way to return the gift without causing offense. If the School policy is explained properly, it should be possible to ensure no offense is taken.

#### **Competition and Fair Dealing**

All employees are obligated to deal fairly with fellow employees and with Nord Anglia Education's customers, suppliers and competitors. Employees should not take unfair advantage of anyone through manipulation, concealment, abuse of privileged information, misrepresentation of material facts or any other unfair-dealing practice.

#### **Relationships with Customers**

Our organisational success depends upon our ability to foster lasting customer relationships, whether with parents and guardians or with consumers of our Learning Services, Fieldwork or other products. Nord Anglia Education is committed to dealing with customers fairly, honestly and with integrity. Specifically, you should keep the following guidelines in mind when dealing with customers:

- Information we supply to customers should be accurate and complete to the best of our knowledge. Employees should not deliberately misrepresent information to customers.
- Employees should not refuse to sell, service, or maintain products of our family of schools simply because a customer is buying products from one of our competitors.
- Customer entertainment should not exceed reasonable and customary business practice. Employees should not provide entertainment or other benefits that could be viewed as an inducement to or a reward for customer purchase decisions.
- Please see "Gifts and Courtesies" for additional guidelines in this area.

Q: I work in the procurement department of a school. My husband's family holds a minority investment interest in one of the construction companies bidding for a Capital Expenditure project at our school. Although I am involved in the procurement / bidding process, I don't have authority to make the final decision around which supplier

/ contractor we will choose. Given this, and the fact that my husband's family's interest is a minority one, I wasn't planning on telling anyone. I think it would be unfair if the company missed out on the opportunity just because I happen to work at the School.

A: You should advise your supervisor of the connection your husband's family has with the potential supplier. You might be right - it might be unfair for the company to miss out on the opportunity to win the contract. However, that doesn't mean you should not comply with the Code. In addition, just because you declare the potential conflict of interest, does not mean that the contractor in question cannot successfully win the contract. It just means that the process is transparent and your school can implement appropriate processes to show that your family's interest has not unfairly impacted the final decision in any way (e.g. by having others manage the bidding process and keeping you out of it). It is always better for you and our organisation to declare.

#### **Relationships with Suppliers**

Nord Anglia Education deals fairly and honestly with its suppliers. This means that our relationships with suppliers are based on price, quality, service and reputation, among other factors. Employees dealing with suppliers should carefully guard their objectivity. Specifically, no employee should accept or solicit any personal benefit from a supplier or potential supplier that might compromise, or appear to compromise, their objective assessment of the supplier's products and prices. Employees can give or accept promotional items of nominal value or moderately scaled entertainment within the limits of responsible and customary business practice. See "**Gifts and Courtesies**" for additional guidelines in this area.

#### **Relationship with Competitors**

Nord Anglia Education is committed to free and open competition in the marketplace. Employees should avoid actions that would be contrary to laws governing competitive practices in the marketplace, including anti-trust laws. Such actions include misappropriation and/or misuse of a competitor's confidential information, making false statements about the competitors business and business practices or colluding with competitors to determine prices or competitive conduct.



Q: I accompanied the Principal of our School to a local meeting with other private school representatives. We thought the topic of the discussion was to be the public consultation on proposed new regulations impacting the education industry, but a few of the representatives from other schools started talking about their marketing plans and proposals for setting their school fees. The Principal and I felt uncomfortable and so we left. Now I'm wondering whether we have put ourselves at a disadvantage, as we missed out on the rest of the discussion. Did we do the right thing?

A: Yes, you did. Meetings with other schools to discuss potential legislation impacting the industry as a whole is an acceptable form of engagement with our competitors. However, discussions around marketing plans and school fee setting could be construed as attempts to establish an unfair and uncompetitive market place. Such discussions are potentially in breach of anti-trust or competition laws which apply in our individual markets. You should ensure you are familiar with the competition / anti-trust laws applicable to your school and ensure you do not engage in any prohibited activities or uncompetitive behaviour. In some of our markets this might even include aggressive poaching of other schools' staff! Hence, it is important that you understand the laws applicable to you and ensure you comply.

Protecting Our Information, Assets and Reputation

Nord Anglia Education is a globally respected organisation – we all have a responsibility to protect the valuable reputation of our family of schools. This means we are all responsible for respecting and taking care of our organisation's assets, resources and information, including those of our students and employees, and for being open and honest about our operations and performance.



#### **Organisational Records**

Accurate and reliable records are crucial to our organisation. Our records are the basis of our earnings statements, financial reports and other disclosures to the public and guide our decisionmaking and strategic planning. Company records include booking information, payroll, timecards, travel and expense reports, e-mails, accounting and financial data, measurement and performance records, electronic data files and all other records maintained in the ordinary course of our business.

All company records must be complete, accurate and reliable in all material respects. Undisclosed or unrecorded funds, payments or receipts are inconsistent with our business practices and are prohibited. You are responsible for understanding and complying with our record keeping policy. Ask your supervisor if you have any questions.

#### Accuracy of Financial Reports and Other Public Communications

We are subject to various regulations and reporting obligations. These laws, regulations and obligations and our policies require the disclosure of accurate and complete information regarding Nord Anglia Education's business, financial condition and results of operations. Inaccurate, incomplete or untimely reporting will not be tolerated and can severely damage the organisation and result in legal liability. To ensure that we meet these standards, only authorised employees may provide financial reports to external parties.



Nord Anglia Education's principal financial officers and other employees working in the Corporate Finance Department have a special responsibility to ensure that all of our financial disclosures are full, fair, accurate, timely and understandable. These employees must understand and strictly comply with applicable accounting principles and all standards, laws and regulations for accounting and financial reporting of transactions, estimates and forecasts.

#### **Protection and Use of The Organisations Assets**

Nord Anglia Education employees work hard to produce our assets, which include products, money, information, equipment and our reputation. All employees should therefore protect these assets and ensure their efficient use for legitimate business purposes only. Theft, carelessness and waste will have a direct impact on Nord Anglia Education and our school's success and are prohibited. You are also prohibited to use Nord Anglia Education funds or assets, whether or not for personal gain, for any unlawful or improper purpose. To ensure the protection and proper use of Nord Anglia Education's assets, you should:

- Exercise reasonable care to prevent theft, damage or misuse of the organisation's property.
- Report the actual or suspected theft, damage or misuse of Nord Anglia Education property to a supervisor. We will promptly investigate, and where appropriate, prosecute reported incidents of fraud or theft.
- Use Nord Anglia Education's telephone system, other electronic communication services, written materials and other property primarily for business-related purposes.
- Safeguard all electronic programs, data, communications and written materials from inadvertent access by others.
- Use the organisation's property only for legitimate business purposes, as authorised in connection with your job responsibilities.

Nord Anglia Education's property includes all data and communications transmitted or received to or by, or contained in, the organisation's electronic or telephonic systems. It also includes all written communications. Employees and other users of our organisation's property should have no expectation of privacy with respect to these communications and data. Nord Anglia Education has the ability, and reserves the right, to monitor all electronic and telephonic communications, to the extent permitted by law. These communications may also be subject to disclosure to law enforcement or government officials. The interception, recording and monitoring of communications is intended to protect Nord Anglia Education's interests. For example, for the purposes of quality control, security of the organisation's information technology or communication systems, protection of confidential information and legitimate business interests, record-keeping and evidential requirements, detection and prevention of criminal activity or misconduct and to assist Nord Anglia Education to comply with relevant legal requirements.

You should be aware that all communications, data, records and files stored on the organisation's information technology or communication systems or on the organisations premises may be used as evidence in disciplinary or legal proceedings against employees.



#### **Confidential Information**

You have access to a variety of confidential information while employed at Nord Anglia Education or our family of schools. Confidential information includes all non-public information that might be of use to competitors, or, if disclosed, harmful to our organisation or customers. It also includes information obtained from a third party under a contractual obligation of confidentiality.

Every employee has a duty to respect and safeguard this information, including that of any third parties with which we conduct business, except when disclosure is authorised or legally mandated. Your obligation to protect confidential information continues after you leave our organisation. Unauthorised disclosure of confidential information could cause competitive harm to our family of schools, students or parents, and could result in legal liability to you and our organisation.

Any questions or concerns regarding whether disclosure of information is legally mandated should be referred promptly to the Group Compliance Officer.

You should take care to safeguard and protect confidential information:

- You should conduct your business and social activities so as not to risk inadvertent disclosure of confidential information. For example, when not in use, confidential information should be secretly stored. Also, any review or discussion of confidential documents or subjects in public places (e.g., airplanes, trains, taxis, buses, etc.) should be conducted so as to prevent overhearing or other access by unauthorised persons.
- Within our schools and offices, you should not discuss confidential matters within hearing range of visitors or others not working on such matters.
- Confidential matters should not be discussed with other employees who aren't working on such matters or with your friends or relatives, including those living in the same household.
- You should only access, use and disclose confidential information that is necessary in the course of performing your duties and should not disclose confidential information to other employees or contractors unless it is necessary for the course of their duties.



#### **Audits and Investigations**

If requested, Nord Anglia Education employees will cooperate with auditors and investigators conducting an internal or external audit or investigation of our or an employee's activities. If you or someone you supervise learns about a possible government investigation or inquiry, you should inform your Principal or Head of Department and the Nord Anglia Education Regional Managing Director responsible for your school/function or Executive Committee member responsible for your function immediately.

It is our policy to fully cooperate with any authorised government investigation as well as internal audits or investigations:

- Never destroy any Nord Anglia Education documents in anticipation of a request for those documents from Nord Anglia Education investigators, any government agency, or a court. Documents include electronic media such as disks, computerstored information, and e-mail transmissions.
- Never alter any historical Nord Anglia Education document or record.
- Never make any untrue or misleading statement to any Nord Anglia Education or government investigator.
- Never try to influence any other employee or person to provide incomplete, false or misleading information to any Nord Anglia Education or government investigator.
- If any government inquiry arises through a written subpoena or a written request for information, you must submit it to the Principal and to the Nord Anglia Education Legal Department immediately, before any action is taken or promised.
- If you are approached outside the workplace by a government investigator, you should notify your supervisor or the Principal who will assess the appropriate legal advice and assistance required.

Acts designed to hamper the effectiveness of an audit or investigation (e.g. including failure to keep details of an internal investigation confidential where required) may result in disciplinary action.

Q: If I am asked to comment about Nord Anglia Education's financial outlook by a member of the media, may I give my opinion if I state it as such?

0&A

A: No. You must not provide any comments, even personal opinion, to the press without prior approval from your schools Admissions and Marketing Team or Nord Anglia Education's Head of Brand. You must refer all media requests for information to them.

#### **Public Communications**

#### **Public Communications Generally**

Nord Anglia Education and our schools are highly respected worldwide, and we value our credibility and reputation. Our reputation is directly impacted, positively or negatively, by what is written or said about our organisation and schools in the news media and investment community.

- All enquiries from investors, financial analysts or financial media, should be directed to the Corporate Finance and Investor Relations Director (investors@nordanglia.com).
- If you receive a media enquiry relating to Nord Anglia Education, a major project we're undertaking in your school, or with the potential to impact a number of schools in the family, please contact the Head of Brand (media@nordanglia.com).
- All media enquiries relating to the day to day regular activities of your school should be directed to your Principal or Director of Admissions and Marketing

The Investor Relations Director and Head of Brand will work with you and the appropriate personnel to evaluate and coordinate a response to the request. Please see the Nord Anglia Education Media **Relations Policy for further information.** 

When you make personal communications, including on user forums, blogs, chat rooms and bulletin boards, you must never give the impression that you are speaking on behalf of Nord Anglia Education. In addition, when you publicly express your personal views, you must ensure it is done in circumstances that will not reflect poorly on Nord Anglia Education and where it is clear the views expressed are your own personal views.



Q: I have been asked by a member of the media how many students are currently enrolled at our school, may I tell them?

A: No. We never share individual school enrolment numbers publicly. You must refer all media requests to your schools Admissions and Marketing Team or Nord Anglia **Education's Head of Brand.** 



#### **Rider for Selective Disclosure**

#### **Prevention of Selective Disclosure**

Although Nord Anglia Education is no longer listed on the New York Stock Exchange part of our financing facilities are openly traded and as such we should ensure we remain diligent in any disclosure to external parties. Selective Disclosure occurs when any person provides information that could potentially affect the market for our tradeable securities before the news is generally available to the investing public therefore preventing selective disclosure is of paramount importance to us as an organisation.

Other than the Media Contacts, employees should not respond to questions or inquiries or provide information regarding Nord Anglia Education to a member of the press, media or investment analyst and instead shall forward any enquiry to the Head of Brand or Corporate Finance and Investor Relations Director.

(Media Contacts = Chief Executive Officer, Chief Financial Officer, Corporate Finance and Investor Relations Director or Head of Brand)

Q: My supervisor asked me to prepare a purchase order for services that cost \$30,000. Her spending authority is only \$25,000. Can I divide the order into two purchase orders to avoid getting a higher level approval?

0&A

A: No, you may not. Not getting proper approvals violates Nord Anglia Education policy, which is to ensure that adequate internal accounting controls are maintained and operating effectively. If you are uncomfortable telling your supervisor, speak to your Principal or others listed under the "Speak Up" section of this Code.



#### **Social Media**

Social media is a powerful tool to engage our students, parents and communities. Nord Anglia Education encourages our schools to actively use social media channels to raise awareness, share information and celebrate their activities and successes. Employees should only use social media on behalf of the organisation or school with permission and guidance from their school's Marketing, Admissions and Communications team or Nord Anglia Education's central Marketing, Admissions and Communications team

When using social media in our personal lives, we must conduct ourselves professionally. Social media includes blogs, forums, chat rooms, professional and social networking sites, photo and video sharing sites, and other interactive online media, such as Twitter.

#### **Social Media Guide**

- Do not communicate on social media on Nord Anglia Education's or any of our school's behalf's unless you are designated to do so.
- Do not use social media to harass or disparage our co-workers, customers, students, parents, competitors, or others, or express any opinions or ideas attributed to Nord Anglia Education.
- Do not discuss sensitive information, including confidential and material non-public information on social media.

For more information, please see Nord Anglia Education Social Media Policy



Q: I was attending a meeting with several other Nord Anglia Education staff in a hotel conference room. At lunchtime, everyone left their laptops in the room, which wasn't locked. I felt uneasy, but did the same. Should I have done something different?

A: Yes, the situation should have been handled differently. The laptops and the information on them are Nord Anglia Education property and frequently include confidential or sensitive data. You have a responsibility to ensure that the equipment and information is protected from loss, theft or inadvertent disclosure. You and your co-workers should have either secured the equipment/room or chosen someone to stay with the equipment.

Exercising Good Corporate Citizenship

We believe that being part of Nord Anglia Education and our family of schools will enable our students, parents, people and other stakeholders to achieve more than if they were a single school. We are therefore committed to good corporate citizenship and believe that we should achieve success through demonstrating respect for people, the planet, and complying the laws and regulations that apply to our organisation and schools.



#### **Compliance With Laws and Regulations**

Each employee has an obligation to comply with all laws, rules and regulations applicable to the Nord Anglia Education's operations. These include laws covering bribery and kickbacks, copyrights, trademarks and trade secrets, information privacy, illegal political contributions, antitrust prohibitions, foreign corrupt practices, offering or receiving gratuities, national and international sanctions, anti-boycott, currency controls, environmental hazards, employment discrimination or harassment, occupational health and safety, false or misleading financial information or misuse of corporate assets. You are expected to understand and comply with all laws, rules and regulations that apply to your job position. If any doubt exists about whether a course of action is lawful, you should seek advice from your supervisor, your Principal or Head of Department or the Group Compliance Officer.

#### **Bribes and Other Improper Payments**

A bribe or other improper payment is not an acceptable way of doing business and exposes both Nord Anglia Education and you to criminal and civil liability under anti-bribery laws. While all forms of commercial and public bribery are prohibited, particular care must be taken to avoid actual or perceived bribery in your dealings with government officials, including employees of government-owned enterprises. We are subject to a variety of local and international antibribery laws, including the U.S. Foreign Corrupt Practices Act ("FCPA"), the U.K. Bribery Act (the "Bribery Act") and the Hong Kong Prevention of Bribery Ordinance (Cap. 201) (the "Bribery Ordinance"). The FCPA, the Bribery Act and the Bribery Ordinance impose criminal or civil penalties for offering, paying, promising to pay, or authorizing the payment of money or anything else of value to a foreign government official, whether directly or through an agent or other intermediary, for the purpose of influencing an act

or decision or securing an improper advantage, including "facilitation" payments and even if customary in a particular jurisdiction.

Improper payments are distinct from the reasonable, limited expenditures for gifts and entertainment discussed above. If any employee, officer or director has a question about whether any particular expense should be viewed as a permissible gift or entertainment expense or an impermissible bribe, he or she should refer that question to the Group Compliance Officer. In addition to the severe fines and criminal penalties that may result from violation of antibribery laws, Nord Anglia Education may take disciplinary action in accordance with the Disciplinary Policy with respect to an employee who violates anti-bribery laws, up to and including termination of employment.

#### **Political Activities**

Nord Anglia Education is firmly committed to following all laws that govern elections and campaign contributions to political campaigns.

If you participate in political activities you must do so on your own time, at your own expense, and in a manner appropriate to the locale. Solicitation of fellow employees to support or contribute time or money to a candidate or a political cause is never allowed. When you participate in political activities, you do so voluntarily as an individual citizen and must not give the impression that you are speaking on behalf of Nord Anglia Education.

No assets of Nord Anglia Education, its subsidiaries or companies, may be used directly or indirectly, for political purposes. This includes the support of any candidate or party, even in countries where it may be traditional,



customary, and legal to do so. If a planned contribution could in any way be looked upon as involving Nord Anglia Education funds, property, or services, the Nord Anglia Education Regional Managing Director responsible for your school or Nord Anglia Education Executive Committee member responsible for your function should be consulted before making the contribution.

#### Specific Guidelines

- Do not allow your status as an employee to be used in support of a particular candidate or issue.
- Employees must not pressure, either directly or indirectly, other employees to make political contributions or to participate in support of a political party, issue, or candidate.
- Organisational funds or assets cannot be used to support a political party, an elected official or the campaign of any candidate for local, state or federal elected office. Also, you should advise the Nord Anglia Education Legal Department of any planned visits to a Nord Anglia Education facility by an elected official, political party member, or candidate for elected office.
- The Nord Anglia Education Legal Department and relevant Regional Managing Director must be informed of any request to testify on behalf of Nord Anglia Education before any governmental regulatory or legislative body.

#### **Economic Sanctions**

To comply with applicable economic sanctions programmes, Nord Anglia Education employees are prohibited from conducting business with or providing benefits to designated governments, individuals and entities (such as suspected terrorists and narcotics traffickers) as well as individuals and entities that are located in, have certain dealings with or are nationals or agents of particular countries. To determine if a government, individual or entity is subject to these prohibitions, please see the Nord Anglia Education U.S. Export and Foreign Trade Control Compliance Corporate Policy Statement.

Promptly report to the Chief Legal Officer/Group Compliance Officer of Nord Anglia Education if any student, known parent/guardian, agent or third party is found to be on the applicable sanctions lists.

#### Lobbying

It is essential that Nord Anglia Education is consistent in its approach to public policy issues in those circumstances when the organisation engages in a policy debate. Nord Anglia Education reserves the right to engage in policy debate where such policy impacts our organisation. You must obtain prior approval from your Nord Anglia Education Regional Managing Director to speak with government officials about legislation, policy or rulemaking.

#### **Environment, Safety and Health**

Nord Anglia Education is committed to providing a safe and healthful workplace and school environment for its employees and students and ensures that pertinent environmental, health and safety issues are incorporated in the planning and execution of its business and educational efforts. Nord Anglia Education conducts its business in compliance with applicable environment, health and safety laws and regulations.

To help meet its commitment in providing a safe and healthful workplace, it is your responsibility to report any suspected unsafe condition immediately upon discovery to your supervisor or School Safeguarding Officer or Principal. Material matters, such as those below, must also be reported promptly to the Nord Anglia Education Managing Director responsible for your school/business:

- a fatality or Environment, Safety and Health related hospitalization
- environmental contamination
- a health or potential safety issue that may subject Nord Anglia Education or its employees to serious harm or adverse public attention.

You must also comply with applicable laws and regulations regarding reporting.

#### **Corporate Social Responsibilities**

Nord Anglia Education believes that our schools are vital members of their local community. Our students, staff and parents donate valuable time, expertise and resources to support local projects. This benefits both the community and our students, who gain new skills, valuable insights into the world around them and create deep connections to the people and places where their schools are located. Our schools also contribute to projects around the world, including supporting the local community of our Global Campus Expedition Base in Arusha, Tanzania.



Q: A local government official has suggested that if we make a donation to a local charity he believes our licensing applications in his country would be received more favourably. I'm uncomfortable with this. What must I do?

A: You are right to be uncomfortable. The payment may be a violation of anti-bribery laws, which could have serious implications for Nord Anglia Education and you individually. Discuss the situation with your Principal / Head of Department and/or the Group Compliance Officer.



#### Waivers of This Code

Waivers of this Code for employees may be made only by an executive officer of Nord Anglia Education. Any waiver of this Code for our directors, executive officers or other principal financial officers may be made only by our Board of Directors or the appropriate committee of our Board.

This Code and the matters contained herein are neither a contract of employment nor a guarantee of continuing Company policy. We reserve the right to amend, supplement or replace this Code and the matters addressed herein, without prior notice, at any time. Any revised / replacement version of the Code will be notified to employees and the most up-to-date version will be made available on the Intranet.

Policy Number: 8.1

Policy Name: Code of Conduct & Ethics Policy

**Description**: Provides general guidelines for conducting the business of Nord Anglia Education and its subsidiaries.

Version No.	Amendments	Issue Date	Issued By
1.0	First Release	25 March 2014	Chief Legal Officer
2.0	Revised & reformatted version superseding version 1.0	21 September 2016	Board
3.0	Updated gift limit	20 April 2017	Board
	Updated for delisting	12 December 2017	Board



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