

Business Code of Conduct – GUS Group

This Code of Conduct ("**Code**") is applicable to all employees, contractors and workers of GUS Services UK Ltd ("**the Company**"); it is also applicable to UK-based employees of the entities comprising the Global University Systems Group above listed. This Code does not form part of the contract of employment, and we may amend it at any time.

This Code is comprehensive but may not cover all eventualities.

The purpose of this Code is to provide guidance on how the Company employees should act on a day-to-day basis. It defines the fundamental values that all Company employees should follow whilst at work, and in some instances outside of work. This Code should be read alongside the Company policies in the remainder of this Employee Handbook.

Employees, contractors and workers should ensure that they read and familiarise themselves with the following Code of Conduct statements:

1. **At all times employees, contractors and workers must show their colleagues respect and consideration.** Please refer to the *'Equal Opportunities'* policy for more information.
2. **Under no circumstances will harassment, bullying, intimidation or treatment of anyone in any way which may cause them emotional distress be tolerated.** Please refer to the *'Anti-Harassment and Bullying'* Policy for more information.
3. **At no time should employees, contractors or workers treat anyone less favourably because of a "Protected Characteristic".** Please refer to the *'Equal Opportunities'* and *"Anti-Harassment and Bullying"* Policies for more information.

"Protected Characteristic" will be taken to include:

- Age;
- Disability;
- Gender, gender identity or gender reassignment status;
- Sexual orientation;

- Race, nationality or ethnic background;
 - Marriage or civil partnership status;
 - Pregnancy, maternity or parenthood status; and
 - Religion or belief
4. **All employees, contractors and workers will dress appropriately in respect of the job they are performing.** Please refer to the *'Dress Code'* Policy for more information.
 5. **All employees, contractors and workers must maintain appropriate standards of personal hygiene and grooming.** Please refer to the *'Dress Code'* Policy for more information.
 6. **If an employee, contractor or worker is unable to work due to illness or an accident, they must notify their supervisor in sufficient time to allow the Company to arrange cover.** Please refer to the *'Sickness Absence'* Policy for more information.
 7. **Employees, contractors and workers are expected to be regular and punctual in attendance in accordance with their working hours.** Please refer to the *'Timekeeping'* Policy for more information.
 8. **Employees, contractors and workers should only use the Internet where appropriate in relation to their work and should not allow this to interfere with productivity.** Please refer to the *'IT and Communications Systems'* and *'Social Media'* Policies for more information.
 9. **When using social media outside of work, employees, contractors and workers must not share any confidential information of the Company or act in a manner that may negatively impact the Company's reputation or image.** Please refer to the *'Social Media'* Policy for more information.
 10. **If an employee, contractor or worker has permission to represent the Company on social media, they should act in a manner that reflects positively on the Company, only speak in relation to their field of expertise, and must not provide any misleading information in**

regard to the Company. Please refer to the *'Social Media'* Policy for more information.

11. **At all times employees, contractors and workers must work in a conscientious and responsible manner to ensure the safety of themselves, their colleagues and any members of the public.** Please refer to the *'Health and Safety'* Policy for more information.
12. **The use of any tobacco, e-cigarettes and/ or vaping products, on Company property, outside of permitted areas, is specifically prohibited.** Please refer to the *'No Smoking'* and *'Disciplinary Procedure'* Policies for more information.
13. **No personal information regarding anyone should be collected, used or disclosed other than as authorised or as required for business reasons.** Please refer to the *'Data Protection'* Policy for more information.
14. **There is a zero-tolerance approach to illegal drug-use on the Company premises.** Please refer to the *'Substance Misuse'* and *'Disciplinary Procedure'* Policies for more information.
15. **Employees, contractors and workers must not consume alcoholic beverages whilst on duty, however, reasonable alcohol use may be accepted on Company premises in very limited circumstances as part of the Company's social or business events.** Please refer to the *'Substance Misuse'* and *'Disciplinary Procedure'* Policies Policy for more information.
16. **Employees, contractors and workers must not place themselves in a position of conflict of interest with the Company and must declare any issues that may lead to a conflict of interest as soon as they become aware of them.** Please refer to the *'Conflict of Interest'* Policy for more information.
17. **Employees, contractors and workers should undertake any training requirements that the Company specifies and do so in a time**

effective manner. Please refer to the *'Equal Opportunities'* and *'Time Off for Training'* Policies for more information.

18. **There is a zero-tolerance approach to bribery and anti-corruption. All employees, contractors and workers should conduct themselves in an honest and ethical manner whilst working for the Company.** Please refer to the *'Anti-Corruption and Bribery'* Policy for more information.
19. **There is a zero-tolerance approach to tax evasion. All employees, contractors and workers should conduct themselves in an honest and ethical manner whilst working for the Company.** Please refer to the *'Anti-Facilitation of Tax Evasion'* Policy for more information.
20. **Employees, contractors and workers are encouraged to report any suspected wrongdoing of the Company and/ or other employees and must not face any detrimental treatment from other individuals in doing so.** Please refer to the *'Whistleblowing'* Policy for more information.
21. **Employees, contractors and workers should be open to addressing any performance issues with their work alongside the Company.** Please refer to the *'Capability Procedure'* Policy for more information.
22. **Any personal employee relationships must not compromise employee professionalism and all personal discussions should be kept outside of the Company workplace.** Please refer to the *'Relationships at Work Policy'* Policy for more information.
23. **Employees, contractors and workers must conduct themselves in a professional manner, both in and out of the workplace, reflective of the Company values.**
24. **Employees are free to participate in any political activity provided that it does not interfere with their effectiveness at work or place them in a conflict of interest with the Company.**

25. **Mobile phones should only be used by employees in relation to business matters or where there is an emergency. They should not in any way distract employees, contractors or workers from their work.**

26. **Employees, contractors and workers must, to the best of their ability, protect Company assets, including physical, intellectual, and electronic or digital properties.**