

## Code of Conduct Policy

SEP Educational Service's Code of Conduct is one of the ways we put SEP's values into practice. It's built around the recognition that everything we do in connection with our work at SEP will be, and should be, measured against the highest possible standards of ethical business conduct. We set the bar that high for practical as well as aspirational reasons: Our commitment to the highest standards helps us hire great people, deliver great service, and attract loyal customers. Respect for our users, for the opportunity, and for each other are foundational to our success, and are something we need to support every day.

So please do read the Code and SEP's values, and follow both in spirit and letter, always bearing in mind that each of us has a personal responsibility to incorporate, and to encourage our colleagues to incorporate, the principles of the Code and values into our work. And if you have a question or ever think that one of your fellow colleagues, or the company as a whole, may be falling short of our commitment, don't be silent. We want – and need – to hear from you.

### **Who Must Follow Our Code?**

We expect all our employees to know and follow the Code. Failure to do so can result in disciplinary action, including termination of employment. Moreover, while the Code is specifically written for SEP employees, we expect SEP contractors, consultants, and others who may be temporarily assigned to perform work or services for SEP to follow the Code in connection with their work for us. Failure of a SEP contractor, consultant, or other covered service provider to follow the Code can result in termination of their relationship with SEP.

### **What If I Have a Code-Related Question or Concern?**

If you have a question or concern, don't just sit there. You can contact your manager, or HR.

### **No Retaliation**

SEP prohibits retaliation against any worker here at SEP who reports or participates in an investigation of a possible violation of our Code, policies, or the law. If you believe you are being retaliated against, please contact HR.

### **Serve Our Learners**

Our learners value SEP not only because we deliver great training and service, but because we hold ourselves to a higher standard in how we treat our learners and operate more generally. Keeping the following principles in mind will help us to maintain that high standard.

### **Integrity**

Our reputation as a company that our users can trust is our most asset, and it is up to all of us to make sure that we continually earn that trust. All our communications and other interactions with our users should increase their trust in us.

## **Responsiveness**

We recognise relevant learner feedback when we see it, and we do something about it. We take pride in responding to communications from our learners, whether questions, problems, or compliments. If something is broken, fix it.

## **Act**

Any time you feel our learners aren't being well-served, don't be bashful - let someone in the company know about it. Continually improving our products and services takes all of us, and we're proud that our staff champion our learners and take the initiative to step forward when the interests of our users are at stake.

## **Support Each Other**

We are committed to a supportive work environment, where employees have the opportunity to reach their fullest potential. Colleagues are expected to do their utmost to create a workplace culture that is free of harassment, intimidation, bias, and unlawful discrimination.

Please read the Employee Handbook – it covers in greater detail how we should conduct ourselves at work.

## **Equal Opportunity Employment**

Employment here is based solely upon individual merit and qualifications directly related to professional competence. We strictly prohibit unlawful discrimination or harassment on the basis of race, ethnicity, religion, sex, gender identity, age, marital status, mental or physical disability, medical condition, sexual orientation, or any other characteristics protected by law. We also make all reasonable accommodations to meet our obligations under laws protecting the rights of the disabled.

## **Harassment, Discrimination, and Bullying**

SEP prohibits discrimination, harassment and bullying in any form – verbal, physical, or visual, as discussed more fully in our Equality & Diversity Policy. If you believe you've been bullied or harassed by anyone at SEP, or by an SEP partner, we strongly encourage you to immediately report the incident to your supervisor, Human Resources or both. Similarly, supervisors and managers who learn of any such incident should immediately report it to Human Resources. HR will promptly and thoroughly investigate any complaints and take appropriate action.

## **Drugs and Alcohol**

Our position on substance abuse is simple: It is incompatible with the health and safety of our employees, and we don't permit it. Consumption of alcohol is not banned at our offices but use good judgment and never drink in a way that leads to impaired performance or inappropriate behaviour, endangers the safety of others, or violates the law. Illegal drugs in our offices or at sponsored events are strictly prohibited. If a manager has reasonable suspicion to believe that an employee's use of drugs and/or alcohol may adversely affect the employee's job performance or the safety of the employee or others in

the workplace, the manager may request an alcohol and/or drug screening. A reasonable suspicion may be based on objective symptoms such as the employee's appearance, behaviour, or speech.

### **Safe Workplace**

We are committed to a violence-free work environment, and we will not tolerate any level of violence or the threat of violence in the workplace. Under no circumstances should anyone bring a weapon to work. If you become aware of a violation of this policy, you should report it to Human Resources immediately. In case of potential violence, contact the Police

### **Avoid Conflicts of Interest**

When you are in a situation in which competing loyalties could cause you to pursue a personal benefit for you, your friends, or your family at the expense of SEP or our learners, you may be faced with a conflict of interest. All of us should avoid conflicts of interest and circumstances that reasonably present the appearance of a conflict.

When considering a course of action, ask yourself whether the action you're considering could create an incentive for you, or appear to others to create an incentive for you, to benefit yourself, your friends or family, or an associated business at the expense of SEP. If the answer is "yes", the action you're considering is likely to create a conflict of interest situation, and you should avoid it.

Below, we provide guidance in seven areas where conflicts of interest often arise:

- Personal investments
- Outside employment, advisory roles, board seats, and starting your own business
- Business opportunities found through work
- Inventions
- Friends and relatives; co-worker relationships
- Accepting gifts, entertainment, and other business courtesies
- Use of SEP products and services

In each of these situations, the rule is the same – if you are considering entering into a business situation that creates a conflict of interest, don't. If you are in a business situation that may create a conflict of interest, or the appearance of a conflict of interest, review the situation with your manager. Finally, it's important to understand that as circumstances change, a situation that previously didn't present a conflict of interest may present one.

### **Friends and Relatives; Co-Worker Relationships**

Avoid participating in management of or decision-making regarding potential or existing SEP business relationships that involve your relatives, spouse or significant other, or close friends. This includes being the hiring manager for a position for which your relative or close friend is being considered or being a relationship manager for a company associated with your spouse or significant other.

To be clear, just because a relative, spouse/significant other, or close friend works at SEP doesn't mean there is a conflict of interest. However, if you are also involved in that SEP business relationship, it can be very sensitive. The right thing to do in that situation is to discuss the relationship with your manager and HR.

Finally, romantic relationships between co-workers can, depending on the work roles and respective positions of the co-workers involved, create an actual or apparent conflict of interest. If a romantic relationship does create an actual or apparent conflict, it may require changes to work arrangements or even the termination of employment of either or both individuals involved.

### **Confidential Information**

Make sure that information that is classified as or "Confidential" is handled in accordance with SEP's Data Protection Policy. At times, a particular project or negotiation may require you to disclose Need to Know or Confidential information to an outside party: Disclosure of that information should be on an "need to know" basis and only under a non-disclosure agreement.

There are, of course, "grey areas" in which you will need to apply your best judgment in making sure you don't disclose any confidential information. If you think you are in a grey area, be cautious and ask for guidance from your Manager or HR.

And don't forget about pictures you might take when working for us, in the office or at one of our classrooms – it is up to you to be sure that those pictures don't disclose confidential information.

Finally, some of us will find ourselves having family or other personal relationships with people employed by our competitors or business partners. As in most cases, common sense applies. Don't tell your significant other or family members anything confidential, and don't solicit confidential information from them about their company.

### **Competitors/Former Employers**

We respect our competitors and want to compete with them fairly. But we don't want their confidential information. The same goes for confidential information belonging to any SEP's former employers. If an opportunity arises to take advantage of a competitor's or former employer's confidential information, don't do it.

### **Company Equipment**

SEP gives us the tools and equipment we need to do our jobs effectively, but counts on us to be responsible and not wasteful with the stuff we are given. Nobody's going to complain if you snag an extra bagel on Friday morning, but company funds, equipment, and other physical assets are not to be requisitioned for purely personal use. Not sure if a certain use of company assets is okay? Please ask your manager or Human Resources.

### **Physical Security**

If you're not careful, people may steal your stuff. Always secure any important equipment, and your personal belongings, even while on SEP premises. Don't tamper with our alarms or cameras. If you're concerned about your physical safety or that of a colleague, please let someone know.

### **Use of Equipment and Facilities**

Anything you do using SEP facilities (e.g., our computers, mobile devices, vehicles etc.) or store on our premises (e.g., letters, memos, and other documents) might be disclosed to people inside and outside the company. For example, SEP may be required to monitor, access, and disclose the contents of corporate email, voicemail, computer files, and other materials on our electronic facilities or on our premises. In addition, the company may monitor, access, and disclose employee communications and other information on our corporate electronic facilities or on our premises where there is a business need to do so, such as protecting employees and users, maintaining the security of resources and property, or investigating suspected employee misconduct.

### **Obey the Law**

SEP takes its responsibilities to comply with laws and regulations very seriously and each of us is expected to comply with applicable legal requirements and prohibitions. While it's impossible for anyone to know all aspects of every applicable law, you should understand the major laws and regulations that apply to your work.

### **Conclusion**

SEP aspires to be a different to our competitors. It's impossible to spell out every possible ethical scenario we might face. Instead, we rely on one another's good judgment to uphold a high standard of integrity for ourselves and our company. We expect all our colleagues to be guided by both the letter and the spirit of this Code. Sometimes, identifying the right thing to do isn't an easy call. If you aren't sure, don't be afraid to ask questions of your manager.

And remember... don't be evil, and if you see something that you think isn't right – speak up!