



CODE OF CONDUCT

Our ethics principles

Behaving ethically is an essential part of working for/with The Training Societi Ltd

It is fundamental to how we do business and is vitally important to the reputation and success of our company.

Our three principles of ethical business conduct are:

- We are honest, transparent and trustworthy in all our dealings both within The Training Societi and in all our external business relationships
- We respect the privacy of individuals and other organisations with whom we work
- We investigate reports of potential breaches of the Code of Conduct.

2 Code of Conduct

2.1 This Code of Conduct sets out what each of these ethics principles means in more detail and how they link to our key policies.

2.2 Our Code of Conduct makes it clear that we obey national laws and regulations in all countries in which we operate, but we will not tolerate local customs which are illegal if carried out in the UK, or unethical.

2.3 This Code of Conduct forms part of each employees and sub-contractors contract of employment.

3 Our commitment to you

3.1 Our Directors will lead by example and we will expect and recognise ethical conduct at all levels and in all areas of our business.

3.2 We will ensure that the Code of Conduct applies to everyone we deal with: in particular all contractors, including consultants, casual or agency staff; all sub-contractors; all partners, suppliers and all customers with whom we deal must follow our Code of Conduct

3.3 We prohibit retaliation against anyone because they have reported a suspected breach of the Code of Conduct or assisted in any investigation of a suspected breach, so long as they have done so in good faith.

3.4 We will review our Code of Conduct and measure compliance with it annually. Our business practices will be changed if they are not in line with the Code.



4 Principle 1: we are honest, transparent and trustworthy in all dealings

What does this mean?

4.1 You must not be dishonest or deceive. This covers any type of deception or dishonesty. It includes any abuse of your position to gain a material advantage for yourself or the business.

4.3 We believe in free and competitive markets.

4.4 We comply with the laws of the UK and that of other countries where we do business.

4.5 We require all our employees to operate to the highest ethical standards in their business dealings.

What must you do?

4.6 You must ensure that:

you comply with this Code of Conduct

where operating overseas and where local law is less restrictive than this Code of Conduct, the Code must be followed;

you make certain that all written or oral representations concerning The Training Societi Ltd products and services are factual;

if you suspect a third party or one of our employees to be involved in conduct that breaches this Code of Conduct you should report it to a Director of The Training Societi Ltd. There will be no retaliation against you for having made a report so long as you have acted in good faith. All reports of possible breaches will be investigated thoroughly;

you comply with the Anti-Bribery Policy, the Hospitality, Gifts and Sponsorship Policy and the Competition Law Policy, all of which are available, and do not engage in any behaviour which could damage the reputation of The Training Societi Ltd or bring The Training Societi Ltd into disrepute.

Which behaviours are not permitted?

4.7 We do not permit:

Payment of bribes or inducements (bribes may include gifts or hospitality that do not fall within the Hospitality, Gifts and Sponsorship Policy and any such permitted payments must be reported to a Director of The Training Societi Ltd



4.8 If you have any doubts about reporting the conduct of a colleague or third party you should report it to a Director of The Training Societi

5 Principle 2: we respect the privacy of individuals and other organisations with whom we work

What does this mean?

5.1 We handle and store all personal and confidential data appropriately. We comply with all relevant data protection and privacy laws.

5.2 We protect others' confidential business and proprietary information.

What must I do?

5.3 You must:

- process all personal data lawfully;
- only obtain personal data for a specified lawful purpose as set out in the Data Protection Policy;
- ensure the personal data you use is not excessive or irrelevant to the lawful purpose you are using it for;
- ensure the personal data is both accurate and up to date;
- only keep the personal data for as long as is necessary;
- comply with the Data Protection Policy

Which behaviours are not permitted?

5.4 You must not:

- share the personal data with other organisations without the consent of the relevant individual;
- use the personal data in ways that have unjustified adverse effects on the individuals concerned or in ways which the individual has not consented to;
- keep information longer than is necessary;
- disclose personal data to anyone over the telephone without first having verified their identity.

Which policies provide more information?

Data Protection Policy



6 Principle 3: we will investigate reports of potential breaches of this Code of Conduct

What does this mean?

6.1 We will take seriously any allegations of breaches of this Code of Conduct and undertake investigations to ascertain the extent of any breach.

6.2 We will prohibit retaliation against anyone or less favourable treatment of anyone because they have reported a suspected breach of this Code of Conduct or assisted in any investigation of a suspected breach, so long as they have done so in good faith.

What must you do?

6.3 You should report any concern you have about possible breaches of our Code of Conduct to your a Director of The Training Societi Ltd

How will we handle the matter?

6.4 Once you have told us of your concern, we will assess it and consider what action may be appropriate. This may involve an informal review, an internal inquiry or a more formal investigation. We will tell you who will be handling the matter, how you can contact them, and what further assistance we may need from you. If you ask, we will write to you summarising your concern and setting out how we propose to handle it. If we have misunderstood the concern or there is any information missing please let us know.

6.6 When you raise the concern it will be helpful to know how you think the matter might best be resolved. If you have any personal interest in the matter, we do ask that you tell us at the outset. If we think your concern falls more properly within our Grievance policy, Respecting Others policy or other relevant procedure, we will let you know.

6.7 Whenever possible, we will give you feedback on the outcome of any investigation. Please note, however, that we may not be able to tell you about the precise actions we take where this would infringe a duty of confidence we owe to another person.

6.8 While we cannot guarantee that we will respond to all matters in the way that you might wish, we will strive to handle the matter fairly and properly. By using this policy you will help us to achieve this.

I have read and understood the code of conduct

Signature _____

Please Print _____

Date _____