

## Group Code of Conduct

**Policy Owner:** Group People Operations Director

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### BASIS

The **International Schools Partnership** is a leading and growing group of international schools, all aiming to be the school of choice in their local area.

The word '**partnership**' in our name is very important to us. Above all, it shows that we are committed to working collaboratively, listening and learning from each other, and improving together.

We believe that strong organizations are built on respect, openness, and effective teamwork, and our purpose and principles define the values that matter most to us.

### OUR VISION

“Together, we are on a journey to provide a transformative education for our students that sparks their curiosity, builds their confidence, and nurtures the knowledge and life skills they need to thrive now and throughout their lives.”

Steve Brown, Group CEO

### OUR PURPOSE

- **We exist to develop the world's most curious and confident minds.**
- **We instill in all our students our five core student values: curiosity, open-mindedness, care, confidence, and responsibility**
- **We empower our students to learn at levels that amaze them**
- **We equip students to succeed now and later**
- **We help our students to engage positively in an increasingly interconnected world**
- **We are the first choice for students and their parents, wherever we are.**

### OUR PRINCIPLES

- **It starts with our students.** Our children and students are at the center of our business. Quite simply, their success is our success.
- **Treat everyone with care and respect.** We care for each other, embrace similarities and differences, and promote each other's well-being.
- **Operate efficiently.** We focus relentlessly on the things that matter most and will make the greatest difference.
- **Be financially responsible.** We make financial choices carefully based on the needs of our children, students, and schools.
- **Learn continuously.** Improving is what drives us.

## ISP CODE OF CONDUCT

A Code of Conduct is “**a set of principles or rules that define the way you expect your employees to behave**” (Harvard Business Review, 2019).

A Code of Conduct should always reflect the values of an organization and our ISP Code of Conduct is based on our Purpose and Principles. Each of us is expected to follow and role-model the Purpose and Principles of ISP; they summarize our approach to work, the spirit of our interactions with each other, and how we connect with others in our roles - students, parents, partners, suppliers, prospective parents, etc.

We expect the highest standards of conduct and behavior from our staff at all times. ISP staff are diligent, honest, and ethical in carrying out their duties and devote their full time, attention, and skills to them when working. They are polite, courteous, and professional, cooperating and collaborating effectively and respectfully with others. Compliance with reasonable instructions, the terms of employment contracts and ISP policies, as well as any relevant regulatory, professional, and legal requirements and standards, is ensured.

## WELLBEING AND SAFETY

The health, safety, and wellbeing of all our employees and students are our highest priority. This includes focusing on our mental health and overall wellbeing with the same importance as our physical wellbeing and safety.

Each of us has a role to play in ensuring that ISP and our schools are welcoming, safe, supportive, and inspiring spaces where everyone can grow and develop, and accordingly, our employees are expected to take responsibility for caring for themselves as well as for those around them.

Further guidance on wellbeing can be found in the Group’s Employee Wellbeing Policy, and for employee protection, please refer to our Safeguarding and Safer Recruitment Policies.

## MISUSE OF DRUGS AND ALCOHOL

ISP has a duty to protect the health, safety, and wellbeing of all its employees. However, we also recognize that, for a variety of reasons, people may develop problems related to alcohol or drugs. Regarding drugs, these rules apply to substances that are illegal under criminal law, and not to prescribed medication. ISP supports prescribed medication, and employees must follow their specific medical guidance.

Even small amounts of alcohol can affect work performance and, if an employee is found to be under the influence of alcohol at work, the impact may range from substandard performance to serious consequences for their health and safety and that of others. The same applies to being under the influence of drugs. Employees are expected to be able to perform their duties and fulfill their obligations and responsibilities fully and safely, without any limitations.

If an employee arrives at work visibly under the influence of alcohol or drugs and their performance, health, and safety and/or that of their colleagues is impaired, they will be subject to disciplinary proceedings, as incapacity or misconduct caused by excess alcohol or drugs at work is a potential case of gross misconduct under the relevant local disciplinary procedure. We also reserve the right, in such circumstances, to have the employee immediately escorted off ISP premises and sent home.

No illegal or non-prescribed drugs may be brought onto or consumed on ISP premises at any time, and if there is a suspicion that an employee is in possession of or using drugs on ISP premises, or of buying or selling drugs, this will be properly investigated in accordance with the appropriate disciplinary procedure.

Employees representing ISP at business/client functions or conferences or attending social events organized by ISP (inside or outside of normal working hours), are expected to drink alcohol moderately and take specific preventive measures to ensure they remain within legal limits if driving. They are expressly prohibited from taking any illegal or non-prescribed drugs on such occasions, as well as at all other times.

Social drinking after normal working hours and away from ISP premises is generally a personal matter and does not directly concern ISP. ISP’s concern arises only when, due to the pattern or amount of drinking, an employee’s attendance, performance, or conduct at work deteriorates, or there is a concern for the employee’s wellbeing and health.

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Employees must inform their line manager or HR of any prescribed medication that may affect their ability to perform their job and must follow all instructions given thereafter.

Where a line manager considers that deterioration in work performance and/or changes in behavior may be due to alcohol or drug misuse, they should seek advice from the HR Department. Confidentiality will be appropriately maintained, but in supporting employees, some degree of information sharing may be necessary.

We recognize that a problem with drugs or alcohol may be an illness requiring treatment like any other illness. We want to help protect employees from the dangers of drug, alcohol, and substance misuse and encourage those with problems to seek help. We will review what support can be provided and, where appropriate, consider suspending any disciplinary action where drug, alcohol, or substance misuse is a factor, provided the employee agrees to and follows an appropriate course of action or treatment.

Employees must not attempt to cover up for a colleague whose work or behavior is suffering due to an alcohol or drug-related problem.

Subject to local laws, our regions and schools reserve the right to conduct searches for alcohol or drugs on school or regional premises, including but not limited to searches of lockers, files, wallets, bags, clothing, and packages. Any alcohol or drugs found as a result of such searches will be confiscated, and disciplinary action may be taken.

Violation of these provisions is a disciplinary offense and will be dealt with in accordance with ISP's disciplinary procedure. Depending on the severity of the offense, it may constitute gross misconduct and result in summary dismissal.

## SMOKING

It is ISP policy that all schools, offices, and workplaces are smoke-free. Employees are also discouraged from smoking immediately outside the entrances of our premises. Smoking is permitted only in designated outdoor areas, away from our facilities, provided that cigarettes and other materials are disposed of properly.

If an employee wishes to smoke, they may do so in their own time, outside normal working hours and during breaks or lunchtime.

Non-compliance is a disciplinary offense and will be dealt with in accordance with the relevant disciplinary procedure.

Our smoking ban applies not only to employees but also to visitors to our facilities and schools, including parents, clients, contractors, temporary workers, and suppliers.

This applies not only to cigarettes, cigars, etc., but also to e-cigarettes, personal vaporizers, and electronic nicotine delivery systems.

## PERSONAL RELATIONSHIPS

From time to time, personal relationships may exist or develop between employees. We recognize that personal relationships can develop at any time during someone's employment, as well as exist before they join ISP.

All employees, regardless of position or role, have a responsibility to ensure that their conduct is appropriate at all times. Personal relationships at work are not generally prohibited, but they must be managed with care and sensitivity, both in relation to the employees involved in the relationship and to colleagues working with them. Any situations that arise will be handled fairly and consistently and appropriately managed to mitigate any potential allegations of abuse of authority, favoritism, impropriety, or conflict of interest.

Employees are required to inform ISP of any relationship between themselves and another employee that may give rise to an actual or perceived conflict of interest, breach of trust, or breach of confidentiality. Examples of such relationships include:

- i. close friendship beyond a normal working relationship;
- ii. intimate relationship; and/or
- iii. family relationship.

Employees may inform their line manager (who will discuss it confidentially with HR) or may notify HR directly. Where there is any doubt, employees are advised to declare confidentially and seek guidance from the HR Department as soon as possible.

The HR Department will then confidentially consider the relationship, including any safeguarding practices, consult the relevant member of the ISP Senior Management Team, and inform the employee(s) if there is a conflict of interest. In such cases, the CEO and CFO will be informed confidentially, and a decision will be made on any changes that need to be implemented.

As a matter of principle, no family members should be employed in a school or regional office without the express consent of the Division CEO, Division CFO, Division COO, or the Regional Executive Director. Similarly, no family members should be employed in the ISP Central Office without the express consent of the Group CEO, CFO, or COO.

Line management relationships cannot continue where an intimate personal relationship exists or develops between employees in a reporting line, whether the line management is direct or indirect. This includes direct management decisions as well as additional input or influence, for example in recruitment, selection, promotion, or any other area where a conflict of interest may arise. We will seek to resolve any conflicts by reviewing line management arrangements, team structures, and/or responsibilities, wherever possible.

Furthermore, employees in a personal relationship should not work together in other circumstances where a conflict of interest, breach of confidentiality, or unfair advantage may be perceived as a result of the overlap between a personal and professional relationship.

If a personal relationship, as defined by this policy, exists or develops and is not declared, this will be considered a serious matter and may lead to disciplinary action, depending on the circumstances.

Employees who feel they are being affected by a close personal relationship at work involving other employees may contact the HR Department or their line manager at any time, without prejudice.

### PERSONAL RELATIONSHIPS WITH SUPPLIERS, CONSULTANTS, AND FREELANCERS

No special favors should be shown during tendering processes to companies managed by, for example, friends, partners, or relatives.

Employees who hire or supervise suppliers, consultants, or freelancers, or have any other working relationship with these parties, and who have had or currently have a close personal relationship with someone working for them, must declare this relationship to their line manager, who will refer it to the Group Finance Director or the relevant Division CFO.

Employees should consult our Group Procurement Policy for further guidance and information.

Our policy is to conduct all our business honestly and ethically. We adopt a zero-tolerance approach to bribery and corruption and are committed to acting professionally, fairly, and with integrity in all our relationships and business dealings.

Our Anti-Bribery and Anti-Corruption Policy applies to everyone who works for us or on our behalf in any capacity, including employees at all levels, directors, executives, temporary workers, seconded staff, volunteers, interns, agents, contractors, external consultants, third-party representatives, and business partners.

### DISCRIMINATION, BULLYING, HARASSMENT, AND VICTIMIZATION

Together, we are committed to creating and nurturing a safe, welcoming, inclusive, equitable, and diverse community that is representative of and responsive to different cultures and groups, where each of us has the opportunity to thrive, contribute, and do our best. This commitment is set out in our Dignity at Work Policy, and all employees must be aware of it and complete our Dignity at Work microlearning experience on the Learning Hub.

To support this commitment, there must be a culture of mutual respect and consideration; we all have a responsibility to embrace, support, and develop this culture and to challenge behaviors and attitudes that prevent us from achieving our goals. ISP will not tolerate discrimination, harassment, bullying, or victimization, and if any employee feels they are subject to such behavior, they should refer to the ISP Dignity at Work Policy and the relevant local Grievance Procedure.

Discrimination means treating someone unfairly because of who they are or because they possess certain characteristics:

- age
- physical or mental disability
- genetic condition or information
- nationality / national origin and citizenship
- ethnicity
- race
- religion / beliefs
- sex and sexual orientation
- marriage and civil partnership
- pregnancy
- gender / gender identity and reassignment
- veteran status
- part-time workers, fixed-term workers, and temporary workers
- union membership

Bullying and harassment mean any unwanted behavior that makes someone feel intimidated, degraded, humiliated, or offended. This is not necessarily always obvious or apparent to others and can occur in the workplace without the employer's knowledge. Bullying or harassment may occur between two individuals or involve groups of people. It can be overt or insidious. It can be persistent or a single incident. It can also occur in written communications, by phone, or email, not just in person.

Victimization broadly refers to the mistreatment of someone who has made or is believed to have made or supported a complaint or grievance. It includes situations where a complaint has not yet been made, but someone is targeted because there is a suspicion that they might make one.

## PERFORMANCE DEVELOPMENT

Supporting and encouraging personal development, learning, and growth is essential to creating motivation, commitment, and engagement, as well as ensuring that all our employees know how they can increase their contribution to the success of their school or team.

At ISP and our schools, respectful and professional feedback and dialogue are valued as a shared commitment to improving together. This is why we encourage individual conversations or regular check-ins between line managers and employees. The emphasis in these meetings should be on goals or outcomes that will most benefit our schools and regions, as well as on the quality of learning, and on employees' personal learning, growth, and development.

Line managers and employees are also encouraged to hold personal development meetings. These provide time away from routine tasks for managers and employees to focus on and discuss their learning, growth, and professional and personal development.

Line managers and employees can learn more about our approach to Performance Development in our Performance Development Procedure and in our Teacher Learning and Self-Assessment Procedure. Locally, HR plays an important role in supporting these procedures and in advising and guiding our line managers.

## SECONDARY EMPLOYMENT POLICY

Employees are asked to carefully consider the impact any secondary employment may have on their ability to effectively perform their role and responsibilities with ISP or create any potential conflict of interest with ISP. Secondary employment should not be undertaken without the company's express permission.

If this was not indicated during the recruitment process, employees must inform their manager of any potential secondary employment before agreeing to it. Should any conflict of interest arise from this employment, the manager will discuss it directly with the employee, seeking guidance from the HR Department as appropriate.

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Employees may not engage in any secondary activity while on ISP or school premises or during the ISP's or school's contractual working hours. This includes taking phone calls or responding to emails related to other employment.

Any other circumstances that may lead to a conflict of interest or potential breach of confidentiality, intellectual property, or Company inventions should also be referred to the employee's manager. Possible conflicts may include, but are not limited to, participating in a media interview, writing a blog article, developing and publishing a learning theory, or providing advice to third parties.

### DRESS CODE

Our guiding principle is "dress for your day." Therefore, a smart and professional appearance is required for those working in our schools (including those visiting schools). This includes wearing a uniform in schools where it is mandatory and appropriate clothing for other school activities, for example, Physical Education.

In our regional offices, a smart and tidy appearance is important, but formal office attire is not required unless meetings demand it. We recognize the importance of feeling comfortable and being able to express personality through work attire. This is not an approach of strictly formal or informal dressing; instead, we ask employees to consider what they are doing each day, who they are meeting, and where, and to dress in a way that complements this. We trust that our staff will use their own judgment and discretion in doing so.

### USE OF PROPERTY, SYSTEMS, AND EQUIPMENT

ISP provides employees with property, equipment, and systems to support them in performing their roles and responsibilities to the best of their ability.

All property, equipment, and systems provided are the property of ISP and are provided for ISP's benefit. However, ISP recognizes that employees need to balance work and personal life and is therefore willing to allow limited personal use, in accordance with our Acceptable Use Policy.

All use, whether ISP or personal, must be appropriate, responsible, proportionate, and efficient and comply with ISP and local data protection requirements. Employees should refer to the Acceptable Use Policy and Data Protection Policy for further guidance.

### EMAIL USAGE RULES

Good email etiquette should be observed at all times.

- Before sending an email, consider whether email is the most appropriate means in the circumstances, rather than a phone call, face-to-face conversation, meeting, etc. We are often inundated with emails, and other methods may be more suitable. Ideally, the "reply all" option should be avoided unless others benefit from receiving the response. We should avoid contributing to system congestion by sending trivial messages or copying/forwarding emails to people who do not need to receive them.
- Emails should contain a clear and concise subject line summarizing the purpose of the email.
- Greetings and closings should be appropriate to the recipient and their working relationship with the sender. A signature should be included so that the recipient has the sender's contact details if follow-up is needed.
- Keep in mind that people from different cultures correspond in different ways, and messages should be adapted accordingly.
- Tone and the use of humor should be carefully considered. It is very easy for tone to be misinterpreted without the context of facial or vocal expressions. Exclamation marks, in particular, contribute to tone and should be used sparingly. Similarly, humor may be lost in translation, especially without the benefit of facial/vocal cues, and there is always a risk that something one person finds funny may not be received that way.

- Emails should always be reviewed before sending to check for spelling, grammar, and/or content errors, as well as potential issues with tone and humor; if something sounds abrupt when reread, it is likely not to be well received by the recipient.

A useful tip is to add the recipient's email address only when ready to send so that the email is not sent prematurely by mistake. It is also prudent to double-check that the correct address has been used (this is especially important when employees or contacts have identical or similar names).

### HOW TO REPORT NON-COMPLIANCE WITH THE CODE OF CONDUCT

Employees are encouraged to report unacceptable behavior or conduct to their line manager in the first instance. The line manager will then decide the best way to handle the complaint. If the complaint involves the line manager, employees may contact the line manager's manager or the local HR department for guidance.

The relevant local Grievance Procedure should be used for personal complaints or concerns.

Employees may also raise concerns about wrongdoing or potential wrongdoing (including low-level concerns) in accordance with the relevant local Whistleblowing Procedure, where appropriate. Examples of whistleblowing include, but are not limited to:

- physical, emotional, or sexual abuse of students or employees
- illegal acts (e.g., theft, bribery, or fraud)
- failure to comply with legal regulations
- danger to an individual's health and safety
- risks or harm to the environment
- acting against ISP financial regulations or policies
- covering up wrongdoing
- miscarriages of justice
- other acts constituting improper conduct

### ADDRESSING NON-COMPLIANCE WITH THE CODE OF CONDUCT

Minor violations or compliance issues can be resolved informally. This would typically involve the line manager speaking with the employee to discuss their conduct and remind them of the required standards.

As part of this, the line manager should explain where and how the employee has not met these standards and should inform them that any further violations, areas of non-compliance, or lack of satisfactory improvement may lead to formal disciplinary action.

If non-compliance persists or the initial issue or violation is sufficiently serious, the formal disciplinary procedure may be used. In such cases, the line manager should consult the local HR department for guidance and advice before proceeding, to ensure local best practices and employment law are followed.

The formal disciplinary procedure is used to address issues of unacceptable conduct, punctuality and attendance, as well as other concerns regarding employee behavior. This includes serious and gross misconduct. Examples of misconduct include:

- Breaches of our policies or failure to follow our processes and procedures
- Breaches of the employment contract
- Damage to or unauthorized use of our property
- Persistent poor punctuality
- Persistent or unauthorized absenteeism
- Wasting time, neglecting, avoiding, or failing to carry out responsibilities
- Refusal to follow reasonable instructions
- Excessive use of our phones for personal calls
- Excessive personal email or internet use
- Negligence in performing duties
- Smoking in non-smoking areas

- Uncivil or abusive behavior
- Intimidation or abuse of other employees
- Sexual, racial, or other forms of harassment

These examples are not exhaustive, and similar breaches will be handled in accordance with the relevant disciplinary procedure.

### SERIOUS OR GROSS MISCONDUCT

Serious or gross misconduct refers to severe acts of misconduct that may result in immediate dismissal. The following is a non-exhaustive list of possible examples of serious or gross misconduct:

- Fraud, forgery, or other dishonesty, including falsifying expense claims
- Serious breach of confidentiality, whether through misconduct or negligence
- Actual or threatened violence, or behavior that provokes violence
- Deliberate damage to our buildings, facilities, property, or equipment, or to the property of a student, employee, contractor, client, or member of the public
- Serious misuse of our property or name (whether ISP's or any school's)
- Deliberately accessing internet sites containing pornographic, illegal, offensive, immoral, or obscene material
- Repeated or serious failure to follow instructions, or any other act of serious insubordination
- Conduct that may bring serious disrepute to ISP or our schools
- Breach of our Child Protection and Safeguarding Policy
- Breach of our Modern Slavery Policy
- Being under the influence of alcohol, drugs, or other substances during working hours
- Causing loss, damage, or injury through gross negligence
- Serious or repeated breaches of health and safety rules or serious misuse of safety equipment
- Unauthorized use or disclosure of confidential information, or failure to ensure confidential information is kept secure
- Accepting or offering a bribe or other secret payment
- Accepting a gift above nominal value from a student, parent, supplier, contractor, or other third party in connection with employment without prior line manager consent
- Conviction for a criminal offense that, in our opinion, may affect our reputation or our relationship with our staff, clients, or the public, or otherwise affect suitability or ability to continue working for us
- Possession, use, supply, or attempted supply of drugs
- Gross negligence of duties or serious or deliberate breach of your contract or operating procedures
- Knowledge of breach of legislative, statutory, or regulatory requirements affecting your work
- Unauthorized use, processing, or disclosure of personal data contrary to our Data Protection Policy
- Intimidation/harassment or discrimination against employees, contractors, students, or parents
- Refusal to disclose any information required by the nature of the role or any other information that may affect job performance
- Deliberately providing false or misleading information in a CV or job application
- Providing false information regarding qualifications or right to work to obtain employment or other benefits
- Making false or misleading disclosures under our Whistleblowing Policy
- Making false allegations of bad faith against an employee
- Serious misuse of our IT systems (including misuse of developed or licensed software, downloading or using unauthorized software, and misuse of email and internet)
- Engaging in paid or unauthorized work during working hours
- Unauthorized entry into a restricted area of the premises

These examples are not exhaustive or exclusive, and similar breaches will be handled in accordance with the appropriate local disciplinary procedures.

Serious or gross misconduct may result in immediate dismissal, in accordance with the relevant employment law in the country. Dismissal will be notified in writing.