Code of Ethics
Cambridge University Press is part of the University of Cambridge. We are an organisation that exists for the public benefit, to advance knowledge, learning and research.

We are funded through our global publishing activities in highly competitive markets across the world. We need to be profitable in order to generate the surplus that will allow us to grow and support our mission.

Our conduct, and our standards of integrity, should at all times reflect our public aims, our proud tradition and the values of the great University of which we are a part. Our performance should never be achieved at the expense of high ethical standards.
Cambridge University Press, as part of the University of Cambridge, exists to advance knowledge, learning and research worldwide. We are justifiably proud of the positive contribution our publishing and services makes for researchers, students and teachers around the globe.

Our goal to contribute to the public good through our work is reflected in the way we aim to conduct ourselves and in our standards of integrity, mirroring our proud tradition and the values of our University. Working in many different legal and regulatory environments, we also must be sure that we always act within the bounds of relevant law.

Our performance should never be achieved at the expense of high ethical standards and as a Press we will focus on doing what is right, not just what is easy. That is why, in 2013, we launched our Code of Ethics, to help us all understand what is expected of us and why, in 2017, we are issuing an updated Code, something we now do annually. This Code sets out the standards underpinning our work and provides guidance on how we should work with both colleagues in the Press and our external partners.

Building on our zero-tolerance attitude towards bribery, corruption and modern slavery, we’ve added a new area of focus in this updated Code this year. In line with the implementation of the new EU General Data Protection Regulation we make clear our updated approach to upholding the privacy rights and obligations of our customers, authors and staff.

The updated Code reiterates our core purpose, to advance knowledge, learning and research worldwide, and the evolving way we fulfil it, increasingly engaging with researchers, students and teachers digitally to provide solutions for them. It also reflects six key aspects of our values, including acting responsibly and with high integrity.

Please read this updated Code of Ethics, even if you have read the previous versions. All of us at the Press have a duty to understand and observe the Code of Ethics, and the policies and procedures which underpin it, in everything we do. Each of us needs to confirm we have been through and understood it. Versions are available in English, Spanish, Portuguese, Chinese and Japanese.

Thank you for your continued help in ensuring our standards reflect the Press’s goals.

Peter Phillips
Chief Executive
Purpose and Values

The core purpose of the Press is to advance knowledge, learning and research worldwide. How we fulfil that is evolving as we engage with researchers, students and teachers digitally to help solve their problems. Increasingly, we fulfil our purpose by helping unlock their potential with the best learning and research solutions.

Our purpose is underpinned by six values:

Responsive to customers
• We connect with our customers to understand their needs and pressures
• We put our customers’ needs at the heart of everything we do
• We communicate, frequently, clearly and with integrity to aid understanding

Collaborative
• We foster a deeply inclusive, connected culture throughout our organisation
• We work across all functions and locations, to create strength from our diversity
• We are open to partnerships with organisations that can progress our vision

Empowering of our teams
• We support each other to take appropriate risks so we can deliver with speed and integrity
• We encourage each other to share our expertise and experience for the benefit of everyone
• We challenge ourselves to deliver solutions that our competitors wished they had thought of

Fast and effective in our decision making
• We act with urgency, involving the right people to create the most effective outcomes, even with ambiguous and incomplete information
• We draw on our expert knowledge and experience to deliver individual and personalised solutions for our customers
• We make use of our global presence to bring together people with the right expertise to achieve a world-class level of excellence

Entrepreneurial and innovative
• We embrace change and welcome creative ideas and suggestions
• We are not afraid to try new and entrepreneurial approaches to work
• We seek new opportunities to drive sales and increase efficiency

Responsible and with high integrity
• We act with integrity and accountability, protecting the Press’s reputation by adhering to its policies and codes
• We spend money and make other financial commitments with the same care as if it were our own
• We use our profit for purpose, contributing to the greater good of society

This Code of Ethics is designed to support our mission, values and behaviours by addressing specific areas of our business where it is particularly important for us to understand explicitly what those high standards mean, and to provide further support, through linking to our detailed policies relating to each area.
Introduction to the Code

Who does this apply to?
All Press officers, employees (full- or part-time) and temporary workers (such as consultants or contractors), no matter where they are located or what they do, are responsible for ensuring that they act in compliance with this Code of Ethics.

In addition, third parties of the Press must adhere to the standards presented to them through a separate Third Party Code of Conduct. Relevant third parties include:
- Joint venture partners; and
- Third parties who perform services for or act on behalf of the Press, such as agents, distributors, suppliers, authors and editorial contributors, anywhere in the world (collectively, “third parties”).

What are the key standards?
Each section in this Code provides further details of the standards that we expect people associated with the Press to uphold. A high-level summary is provided here:
- We have zero-tolerance of all forms of bribery and corruption, including facilitation payments;
- Gifts, hospitality or travel expenses will be offered to or received from third parties with business appropriateness in mind, as a sign of respect and appreciation, and not to unduly influence or appear to unduly influence a business decision;
- Marketing and sponsorship will be used for marketing, and not for unethical purposes;
- We support charitable activities as part of our Corporate Social Responsibility efforts, and they will not be used as a tool to influence sales activities;
- Outside of focused lobbying efforts, we will not make political donations;
- Conflicts of interests will be transparently recorded and managed;
- Due diligence is a key aspect of us knowing more about our employees, third parties and high-value transactions;
- We take appropriate actions to prevent fraud within the Press;
- Press trading activity will remain in line with trade laws, as well as upholding appropriate environmental standards;
- We have zero-tolerance of all forms of modern slavery;
- Press employees have the right to work for an organisation in which they are respected and we are committed to the highest standards in integrity;
- We respect personal information and the rights of individuals in respect of the processing and access to this information;
- Press employees are provided with various avenues to raise concerns, both internally and externally, if they fear that these ethical standards are not being met.

What support is provided to help with compliance to these standards?
In addition to this Code, as part of our overall approach to business ethics, the Press's ABC Policy, associated procedures and guidelines includes further guidance on dealing with the relevant subject areas addressed in this document. If you are a manager, we ask you to lead by example, and to make sure that those who work with you not only are aware of the guidelines which are prominently available on the “Our Ethics” intranet page but also are behaving in their day-to-day activity in a manner which lives up to the standards set there. Please read and absorb the various materials, particularly if you are in a role which entails regular dealing with third parties. Please direct any questions you may have to your line manager, your local HR officer, or the Compliance Team.

Training and communication will be provided to inform employees about the policies referred to in this Code of Ethics, and monitoring and review procedures will be put in place to ensure proper engagement. Failure to comply (whether or not this is intentional) can lead to disciplinary action resulting in summary dismissal, in addition to certain offences which can carry personal criminal liability for the individuals concerned.
Bribery and Corruption

The Press has a zero-tolerance attitude towards bribery and corruption. A bribe is a benefit or anything of value (which need not be cash) offered, promised or given to someone in order to obtain or retain a commercial advantage, or to induce or reward the recipient for acting improperly or where it would be improper for the recipient to accept the benefit. Bribes can take the form of cash payments or cash equivalents, gifts and hospitality, charitable or political contributions, facilitation payments, unwarranted allowances, excessive commissions, or anything else of value. Bribery is considered a form of corruption; corruption encompasses other acts such as extortion, fraud and money laundering. Whilst there is no universally accepted definition of corruption, Transparency International defines corruption as “the misuse of entrusted power for private gain”.

There are numerous international pieces of anti-bribery and corruption (‘ABC’) legislation, many of which have global reach, and apply across all countries in which the Press operates (collectively, ‘ABC Laws’). For example, the UK Bribery Act 2010 has placed increased focus on those organisations that fail to prevent bribery on its behalf; a UK-based company or its international subsidiaries or joint ventures can equally be found guilty of actions by employees, as well as by third parties, that may be seen to act on its behalf. Indeed, there have been recent cases where prominent international publishers have suffered huge financial penalties for corrupt activity involving bribery.

Facilitation payments

Facilitation payments are any payment (no matter how small) given to an official to encourage the performance or to speed up the performance of an existing duty. For example, this could include “grease payments” to customs officials to speed up the processing of standard import processes or to a public official to arrange connection to local utilities such as water, electricity or telephone. The UK Bribery Act defines facilitation payments as a form of bribe, and they are forbidden under the Press’s policies. Our ABC Policy includes further guidance on dealing with requests for facilitation payments. The global rules state that the Press will not tolerate or condone the making of any such payment (no matter how small) by any employee or third party acting on its behalf.

As noted above, bribery can occur through what can be considered standard business practices. As such, in this Code and ABC Policy, we further detail the types of activities which could present a bribery risk.

Gifts, Hospitality and Travel

Our ABC Policy includes further guidance on handling gifts, hospitality and travel expenses related to third parties. The global rules state that gifts, hospitality and travel expenses should not be offered, given or promised, or requested, accepted or authorised by employees or third parties where they could influence or appear to unduly influence a business decision, or where they might compromise or be seen to compromise the receiver’s judgement, integrity or impartiality.

All gifts, hospitality and travel expenses (‘GHT’) offered or received, of whatever value, must be proportionate, traceable and transparent. We must observe the principle of ‘proportionality’ at all times. If you are being offered, or are tempted to offer to someone else, hospitality that is disproportionately lavish, a gift that is inappropriately large for the kind of business relationship that is in place, or travel expenses more generous than you as a Press employee are allowed to claim, you should desist.

The GHT Procedure that accompanies the ABC Policy provides examples of legitimate gifts and hospitality which are a natural feature of developing business relationships, and those which would be deemed corrupt. It also sets thresholds at which GHT should be transparently recorded and approved prior to proceeding.
Marketing and Sponsorship
Our ABC Policy includes further guidance on performing marketing activities and providing sponsorship. The global rules state that all marketing and sponsorship activities must be conducted ethically and with integrity, transparency and full compliance with applicable laws, regulations, any adopted industry codes of practice, and global and local policies. Marketing and sponsorship activity must provide a fair balance between the benefits of a product and its limitations.

Political Donations and Activities
Our ABC Policy includes further guidance on the limitations relating to Press participation in political activity and the giving of political donations. Any such activity or donation could be considered bribery of a public official, which is prohibited under ABC Laws. Although the Press does participate in a limited amount of focused political lobbying, the Press does not participate in other political activities, nor does it make donations or provide resources to support any political purpose.

Charitable Giving and Fundraising
As part of the University, the Press is constitutionally committed to furthering the University’s educational objectives, which we share. Any use of Press money or resources which is not in the furtherance of our constitutional objectives should be avoided. This applies not only to the way we deploy our surplus and trading resources but also to the kinds of external causes we support.

Our ABC Policy includes further guidance on handling charitable giving and fundraising. The global rules state that, because charitable donations could be used as a means of bribing or influencing another party, all our charitable giving and fundraising activities must be conducted ethically and with integrity, transparency and full compliance with applicable laws, regulations, adopted industry codes of practice and our policy. It should not be in conflict with or used in the furtherance of sales activities and should instead be used to further our Corporate Social Responsibility initiatives only.

As per our UK Charities Policy, charitable donations must align with our core mission of disseminating knowledge in the pursuit of education, learning and research at the highest international levels of excellence. Other kinds of campaigning or fundraising, which are not consistent with our mission and objectives, may cause offence or other forms of conflict. As such you should never undertake these without first consulting any local charity policies, as well as established procedures, to see if they are likely to be acceptable and how to obtain the proper approvals.
Compliance Due Diligence and Conflicts of Interest

Compliance Due Diligence
In order to ensure compliance with relevant ABC laws, before entering into an agreement or a transaction with another party, it is critical that the Press takes appropriate steps to understand more about that individual or entity, particularly if that party might be seen to act on behalf of the Press.

Our ABC Policy includes further guidance on the Press’s proportionate approach to Compliance Due Diligence, in response to three types of risk: employee risk, third-party risk and transaction risk.

Employee Risk
Pre-employment screening of potential employees, the inclusion of appropriate clauses in contracts for new employees, annual confirmations and regular training for existing employees will help to ensure that the Press is aware of relevant background information on employees and that employees are clear on their expected conduct with regard to bribery and corruption.

Third-Party Risk
The Press recognises the importance of third parties to our business globally. Nonetheless, our ethical approach extends to third parties and part of the Press’s commitment to prevent bribery and corruption is to ensure that the people acting on our behalf also do so in compliance with our ABC Policy. Therefore, the Press is committed to understanding the risk associated with those third parties with which we engage before we do so by undertaking Compliance Due Diligence, in addition to other procedures and risk mitigation measures contained in the Press’s Approvals & Authorisation Framework and other policies (i.e. the Global Procurement Policy and the Sustainable Procurement Policy).

We must not engage a third party that we know is, or suspect may be, paying, offering or accepting bribes to perform services for or on behalf of the Press. In particular, employees should be aware of the importance of not engaging public officials as an incentive or reward for their past, present or future willingness to recommend, purchase, pay for, authorise, approve, supply or use any product or service sold or provided by the Press, or to obtain any other business advantage for the Press.

Transaction Risk
Some high-risk transactions (such as government-funded tenders, joint ventures and acquisitions) will require further due diligence, which may involve independent investigation.

The procedures that accompany the ABC Policy provide further instruction on the processes that should be followed to perform appropriate Compliance Due Diligence on relevant third parties, before entering into an agreement or undertaking a transaction.

Conflicts of Interest
Conflicts of interest may occur when someone is faced with a situation where their decision-making in relation to a business transaction or partnership is unduly influenced by the involvement of a relative or close friend, or when there is some other reason why a financial or career advantage might accrue to them or someone close to them in a way that puts them at risk of not making a balanced or impartial decision.

Other conflicts of interest may arise where an external employment interferes with their role at the Press, or where family or other personal relationships within the workplace affect their performance or freedom to do their work.

It is inevitable that conflicts of interest in all of these spheres will arise from time to time. Press employees and/or third parties must be open and transparent about any actual/potential or apparent conflicts of interest by declaring them to the Compliance Team so that they can be discussed in a way that will resolve them satisfactorily. It would not be prudent for the Press to make a rule which says that one must never do business with a company which employs a close relative, for instance; but we can and do insist that this is brought to our attention and explored with relevant employees so, where possible, we can ensure that we proceed in a manner which does not impair good and sound business judgment. If the conflict is such that one’s judgment is likely to be impaired, the handling of the transaction or relationship should be passed to someone else. Where this is not possible, this is likely to be a conflict that the Press will be unable to support and remedial action will need to be taken.

Our ABC Policy includes further guidance on handling possible conflicts of interest. The global rules state that our personal activities and interests outside of the Press must not result in actual, apparent or potential conflicts of interest with our professional duties and decisions as Press employees. If in any doubt, consult your line manager, your local HR officer or the Compliance Team at the earliest opportunity. The Compliance Team is responsible for upholding the Conflicts of Interest Procedure and if a conflict were to arise, the Compliance Team would review each case on its merits, working in conjunction with the relevant business stakeholders.
Ethical Trading

As well as observing the highest standards in relation to bribery, corruption and the relevant subject areas covered previously, Press employees are expected to apply ethical values in all of their business transactions, both internally and externally.

Any suspicion of fraud, or fraudulent behaviour, will be immediately and vigorously investigated and if substantiated will lead to disciplinary action which can culminate in dismissal and in severe cases to criminal action. Embezzlement of Press funds or of Press resources for purely personal gain are serious examples of fraudulent activity, but it might also take the form of fraudulent misrepresentation, lying in the course of business, or deliberate withholding from a business partner information, revenues or resources to which they have a legal right.

All Press trading activity must be in compliance with international trade laws and regulations, which includes observance of any formal sanctions in place against a country or organisation. Likewise we should be sure that we do not fall foul of laws or regulations regarding competition, agency arrangements or fair tendering. Anti-competitive practice could include something as seemingly innocent as discussing your pricing policy with another publisher. If you have any doubt about whether you should be dealing with a particular partner, or doing business in a particular country, or proceeding with a particular practice or transaction, refer to the Press's Sanctions Statement and if necessary consult the Press's Legal & Business Affairs Department for advice before going further.

The Legal & Business Affairs Department should always be involved in any arrangement involving a written contract; but it is important to remember that a verbal commitment can still count as a legally binding contract and employees should be mindful of this, consulting Legal & Business Affairs for further guidance.

The Press has a Sustainable Procurement Policy which is designed to minimise negative impacts from trading activities on the environment and local communities, with particular reference to forestry products. It specifies that all raw materials should be derived from legal and sustainable sources, and sets the standards we should observe in the use of materials, especially book paper. This involves working with entities such as the Forest Stewardship Council (FSC), Programme for the Endorsement of Forest Certification (PEFC) and Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) to adopt practices that avoid negative environmental impacts and deliver community benefits throughout the relevant supply chain. To strengthen further the Sustainable Procurement Policy, we are a member of PIPS and PRELIMS. These Codes of Conduct help ensure that the standards we expect internally are also adopted by our external suppliers, providing products and services.

All Cambridge University Press employees worldwide have responsibility for integrating this policy into their decision making and working practices. Employees are given appropriate training as per Sustainable Procurement Procedure which is audited periodically.

We measure and control supplier performance in respect of this policy by means of a Supplier Environmental Questionnaire which suppliers of products or services appointed by Cambridge University Press must complete. Our suppliers are to grant access with reasonable prior notice to Cambridge University Press employees or their appointed agents in order to assess their facilities and systems.

Where the Press does not itself directly control raw-materials sourcing (as, for instance, in the case of co-publications for which a partner publisher buys materials and print) but the end product nevertheless bears the Press's brand, it will require our partner to adopt procurement practices consistent with this Policy.

‘Ethical’ behaviour may be governed, as in these examples, by formal or legally determinable codes; but it may also be more subjective, or open to interpretation, or culturally relative. Any concerns about the ethical basis of our trading, or suspicions that we might be behaving in a manner that could be deemed unethical, in one context or another, should be raised with Press management for further investigation and the Ethical Concerns section of this Code of Ethics explains how to do that. The Press Board takes seriously its responsibility to the University to ensure that we behave in all cases in a manner compatible with our status as part of a respected public-benefit institution.
Modern slavery is a term used to encompass slavery, servitude, forced, compulsory labour and bonded labour. It can include child labour and human trafficking. Victims are often coerced, deceived and forced against their free will into providing work or services. Victims may also have their identity or other key documents and property confiscated and fees or costs associated with recruitment charged against them. Human trafficking is where a person arranges or facilitates the travel of another person with a view to that person being exploited.

Modern Slavery is a crime and a violation of fundamental human rights. Cambridge University Press has a zero-tolerance approach to modern slavery and we are committed to acting ethically and with integrity in all of our business globally. This includes being committed to implementing systems and controls aimed at ensuring that modern slavery is not taking place anywhere within our organisation or in any of our supply chains by upholding the following standards. We require relevant third parties to hold themselves and their own relevant suppliers to the same high standards, and may undertake unannounced visits or audits to ensure that this is the case.

- Workers shall not be subject to forced, prison, bonded, indentured, slave, trafficked or compulsory labour in any form, including forced overtime. All work must be carried out voluntarily.
- Workers must have the right to terminate their employment freely, as appropriate following a reasonable period of notice in accordance with local laws, and without the imposition of any improper penalties.
- Workers shall not be mentally or physically coerced to provide their labour.
- Workers shall not have their identity or travel permits, passports, or other official documents or any other valuable items confiscated or withheld as a condition of employment and the withholding of property shall not be used directly or indirectly to restrict workers’ freedoms or to create workplace slavery.
- Fees or costs associated with the recruitment of workers (including but not limited to fees related to work visas, travel costs and document processing costs) shall not be charged to workers whether directly or indirectly. Similarly, workers shall not be required to make payments which have the intent or effect of creating workplace slavery, including security payments, or be required to repay debt through work.
- Subject to the overriding prohibition on the use of child labour, if workers under the age of 18 are employed then particular care shall be taken as to the duties that they carry out and the conditions in which they are required to work to ensure that they come to no physical, mental or other harm as a direct or indirect result of their work or working conditions.
- Workers, their families and those closely associated with them shall not be subject to harsh or inhumane treatment including but not limited to physical punishment, physical, psychological or sexual violence or coercion, verbal abuse, harassment or intimidation; migrant workers, their families and those closely associated with them should not be subject to discrimination or different treatment due to their nationality.
- Workers shall be free to file grievances to their employers about the employer's treatment of them. Workers shall not suffer detriment, retaliation, or victimisation for having raised a grievance.
- There shall be no requirement placed on workers that they take accommodation in employer-controlled premises except where this is necessary due to the location or nature of the work being performed.
Data Protection and Personal Information

We respect personal information and handle it responsibly.

Data is a valuable business asset, and needs to be kept confidential. We all need to help to protect and manage it effectively. If confidential or personal information is shared outside the Press, it could hurt us competitively, affect our financial performance and damage our reputation.

Whether in the course of developing adaptive learning products or bespoke research solutions for academics, knowing more about who our customers are, what they want and how they interact with our products and services is increasingly important to us. It is vital for this information to be kept securely and kept up to date so we can rely on it.

In the course of our business, some of us will hold or have access to personal information about colleagues, customers, authors, suppliers and other individuals. This is information that relates to an identifiable individual and might include names, addresses and other contact details, purchase history, test scores, financial records or opinions.

It is essential that we respect and protect this information to ensure we meet the requirements of data protection regulations in effect where we do business and in accordance with our global Data Protection Policy. Any personal information which we hold, or which others collect, hold or process for us, or to which we have access, must only be used for legitimate Press business purposes.

Sensitive personal information relating to an individual’s race, ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic or biometric data, health, sex life or sexual orientation, or criminal activity needs to be handled with particular care.

It is also right that individuals know what processing we will be doing with the information, and that we give them their rights in relation to the data we hold, such as a right to access that information and to correct it if it is inaccurate.

Intellectual Property Management and Publishing Ethics

If we are to achieve our Mission, it is vital that we uphold the same high academic and intellectual standards that characterise our University. One way in which we aim to achieve this goal is by maintaining an academically rigorous and ethical approach to our publishing. In addition, we believe that fairness to our authors, consistency and even-handedness in our dealings with publishing proposals and an application of the highest standards to all parts of our editorial and Intellectual Property (IP) processes should be hallmarks of the way we approach publishing. To support our commitment to our University’s high standards, the Press is a member of the Committee on Publication Ethics (COPE), a global organisation that provides independent advice to journals publishers on best practices for handling publication misconduct. We regularly consult COPE and its guidance documents on ethical issues that confront our editorial teams. We respect the IP of third-parties and we expect the same respect for the IP we publish on behalf of our authors. Our anti-piracy programme aims to address illegal copying in both print and digital formats worldwide.

Further details about our approach to IP and Publishing Ethics can be found in the relevant policies and procedures and all staff are encouraged to become familiar with these.
Dignity at Work

It is a crucial part of our responsibility as an ethical employer to recognise the right of all colleagues to be treated with respect and dignity, and we are committed to the development of positive policies for the elimination of all kinds of harassment. Harassment at work in any form by any party is unacceptable and will not be permitted or condoned. Harassment because of the actual or perceived race, sex (including gender re-assignment), sexual orientation, age, religion or belief or disability of a person or someone with whom they associate (such as a work colleague, relative or partner) in many countries constitutes unlawful discrimination for which both the harasser and the Press may be held liable. Harassment may also be a criminal offence and give rise to a civil claim, and it may contravene health and safety legislation.

Colleagues have the right to work in an environment free from harassment, bullying and any other type of intimidation from any colleagues or third parties whom they deal with during the course of their employment or engagement.

The Press does not tolerate harassment or bullying of or by colleagues or third parties which occurs during the course of their employment either in the workplace itself or in settings outside the workplace, such as business trips, events or social functions organised for or on behalf of the Press and on or off its premises. The Dignity at Work Policy covers every individual working for the Press irrespective of their status, level, grade or geographical location.

Ethical Concerns

As outlined in the Press’s Concerns at Work Policy, and as emphasised in this Code of Ethics, we are committed to the highest standards of quality, probity, openness and accountability in all areas of our activity. Part of our commitment involves making it possible for members of staff with serious concerns regarding any aspect of their work, the conduct of others or the running of our organisation to report such concerns with confidence and in confidence.

In many of the policies outlined here, the most sensible first port-of-call, if you have a concern, is your line manager or local HR officer. However, we recognise that there may be occasions when this may not be appropriate, and you will want to express concerns of a confidential nature and seek anonymity or at least some degree of anonymity. It is important that you feel able to do this without fear of reprisals or victimisation. As such, the Press Board has provided the Press with access to an external Whistleblowing Hotline.

A non-exhaustive list of examples of areas where you may have concerns would include:

- bribery or corruption;
- slavery, human trafficking and child labour;
- harassment, bullying or discrimination;
- financial or other fraud;
- theft, sale or other misappropriation of Press proprietary or confidential information, e.g. unauthorised access to databases;
- a data security incident;
- the destruction or falsification of records;
- a breach of terms of employment or engagement;
- breaches of confidentiality;
- conflicts of interest;
- any illegal act or omission;
- the concern that someone is being drawn into terrorism or radicalisation

Please read the relevant policies in full to find out how best to raise any such concerns. Some concerns are better raised to HR, where other ethical matters could be raised to Legal, Compliance, or Ethics Officers as appropriate.

If you come with a concern, we will look into it carefully and thoroughly. We will be fair to you, and also to any others involved. We will investigate through our internal procedures.
The Press Board is responsible for the Press’s Code of Ethics, and for ensuring that it is maintained. Lauren Higgins, Group Compliance Officer, is responsible for the day-to-day management of the Press’s compliance programme. If you have any questions or observations about any aspect of the Code, you are welcome to contact any of the following at any time:

**Contacts**

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<tr>
<th>Name</th>
<th>Position</th>
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<tr>
<td>Peter Phillips</td>
<td>Chief Executive</td>
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<td>Cathy Armor</td>
<td>Director for People</td>
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<td>William Bowes</td>
<td>General Counsel</td>
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<td>Andrew Chandler</td>
<td>Chief Financial Officer</td>
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<td>Kevin Taylor</td>
<td>Director of Syndicate Affairs</td>
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<td>Lauren Higgins</td>
<td>Group Compliance Officer</td>
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<td>Managing Director, Academic Publishing</td>
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<td>Iain Harrison</td>
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