



CAMBRIDGE
UNIVERSITY PRESS & ASSESSMENT

Third party code of conduct

At Cambridge University Press & Assessment (“Cambridge”) we believe that our organisational goals should never be achieved at the expense of high ethical standards. As an organisation, we act ethically, sustainably, and in compliance with all global laws and regulations. We prohibit corrupt practices in any form, including bribery, kickbacks, extortion, fraud, and other unlawful payments. What this means in practice is:

Anti-Bribery and Corruption:

Third parties are asked to comply with upholding Cambridge’s zero-tolerance approach to bribery and corruption. All third parties are asked to adhere to this Code of Conduct or have in place their own practices and procedures equivalent to those we have adopted to ensure compliance with the latest laws.

Charitable Giving and Fundraising:

We use integrity and caution when contributing to charitable causes. Charitable giving or fundraising activities on Cambridge’s behalf by third parties are prohibited unless previously approved.

Conflicts of Interest:

Cambridge requires third parties to be open and transparent about conflicts of interest, by declaring them to Cambridge so that they can be discussed in a way that will resolve them satisfactorily.

Data Protection:

We respect and protect the confidentiality and privacy of all individuals who entrust us with their personal information including learners, parents and guardians, customers, employees, and third parties. We ask that our third parties, especially those who work with data on our behalf, respect and protect relevant personal information.

Dignity and Respect:

We believe all people should be treated with dignity and respect. This ideal extends to our employees, our third parties, our learners, our authors and the citizens of the communities in which we operate. We do not tolerate any form of harassment, discrimination, bullying, or any other type of intimidation by employees or third parties they work with.

Due Diligence:

We will carry out appropriate due diligence at the inception of any commercial relationship and will monitor those relationships accordingly.

Facilitation Payments:

We will not tolerate or condone the making of facilitation payments, namely payments given to encourage a government employee to perform an existing duty, no matter how small, by any third party acting on our behalf. The only exception to this is if a facilitation payment is demanded under duress; in which case it should be promptly reported to Cambridge.

Fair Competition and Antitrust:

We never engage in anti-competitive practices or seek to limit competition through illegal or unfair means. We comply with all applicable antitrust and competition laws and regulations and expect the third parties we work with to do the same.

Gifts and Hospitality:

While it can be common to exchange gifts and hospitality in many professional situations, we take care to ensure that these business courtesies do not create a conflict of interest or otherwise violate the law or our [Code of Ethics](#). All employees are asked to comply with our Gifts and Hospitality guidelines. We ask our third parties to respect these guidelines when considering offering gifts or hospitality to our employees. No gift or hospitality should be given on behalf of Cambridge without prior approval.

Marketing and Sponsorship:

All marketing and sponsorship activities undertaken by third parties related to our products must be performed ethically, and for the purposes of obtaining brand recognition and not to unduly influence a business transaction.

Modern Slavery and Human Trafficking:

Cambridge strictly prohibits the use of modern slavery and human trafficking in its operations and supply chain. We are committed to upholding and complying with modern slavery legislation and the UN Declaration of Human Rights. We expect that our third parties will hold themselves and their own suppliers to the same high standards.

Other Ethical Trading:

Third parties are expected to apply ethical values in all of their business transactions, to include defending against fraud, upholding international sanctions and ethical, environmental and humanitarian conduct and combating piracy and intellectual property infringement. All trading activity must be in compliance with international trade laws and regulations, which includes the observance of any formal sanctions in place against a country or organisation.

Political Donations and Activities:

Third parties must not undertake political activity on behalf of Cambridge. Third parties must ensure that they do not act, or appear to act, as a representative of Cambridge when participating in political activities in an independent capacity.

Quality and Standards:

We put the needs and expectations of our customers and stakeholders at the heart of everything we do and only offer quality products and services which conform to our standards. Maintaining the security of our assessments is essential for fairness, validity, and reliability, and retaining trust in our qualifications. We expect any third parties we work with to conform to the same high standards.

Safeguarding:

Cambridge aims to promote the safeguarding and wellbeing of all individuals we work with and for. This ideal extends to our employees, our business partners, our learners, our authors and the citizens of the communities in which we operate. Third parties who will be working directly, either physically or remotely with children, young people or adults at risk, are required to complete a Disclosure and Barring Service (DBS), Disclosure Scotland or equivalent check before starting work with Cambridge.

Speaking Up:

We strive to make it as easy as possible to speak up when something seems amiss. We encourage everyone we work with to raise concerns, and we prohibit retaliation against anyone who reports a concern in good faith. Where a third party has an ethical concern relating to business activities undertaken by or on behalf of Cambridge, they can contact their local Cambridge contact, the [Business Ethics and Compliance Team](#), or use Cambridge's confidential [Speak up Portal](#).

Sustainability:

We recognise the climate crisis and know that we have a responsibility to address it. We aim to be a trusted leader in the drive for a sustainable world and seek to maximise the positive impact of our sustainability actions. Cambridge also aims to uphold sustainable procurement standards, specifically in relation to the paper used in its printed products. We expect and encourage the third parties we work with to share our commitment to sustainability.

Tax Evasion and the Facilitation of Tax Evasion:

Cambridge has zero tolerance to tax evasion and to the facilitation of tax evasion. Tax evasion is defined as an illegal practice where a person, organisation or corporation intentionally and fraudulently fails to pay their true tax liability. We will not condone or tolerate tax evasion by, or requests to facilitate tax evasion from, our third parties.