

# CODE OF CONDUCT

We have a clear and simple set of values – in everything we do, we aspire to be brave, imaginative and decent. Operating with these values in mind involves doing not only what is right for the business, but also what is right ethically in the wider context of culture and society. The Code of Conduct is our guide to understanding how our values are to be translated into consistent standards of conduct worldwide. At a high level, it provides guidance and outlines what is expected of each of us as we work to achieve our business goals and make Financial Times | IE Business School Corporate Learning Alliance (“FTIECLA”) a great place to work. If you work with us, whether you're employed on a full-time, part-time, or temporary basis, or you're a partner, contractor, or supplier, this Code applies to you.

April 2015

## Clients

Our first priority as a company is to enable our clients to drive strategic transformations in a demonstrable and sustainable manner through education and learning. Everything we do must be driven by the needs of our clients.

The most important thing we can do for our clients is to deliver their desired outcomes in measurably less time, enterprise cost, complexity and risk at virtually every step of our collaboration - from our very first conversation, to an executive applying their learning in their jobs, to the overall transformation we supported.

We serve businesses of many different industries and sectors and at all times, we are focused on the best interests of the clients.

When clients ask questions or make requests or complaints, we start with the presumption that whatever they say is correct. Our response is always quick, friendly, and thorough. We act to put things right or explain our reasons when a complaint is not upheld. We never blame problems on the clients or someone else, and we always keep (and use) our sense of humour.

When we advertise or solicit business, we are truthful in every detail.

## People

We believe our company should include a range of people from different backgrounds and different points of view. So when we hire or promote someone, we choose the best candidate without regard for gender, age, race, national origin, religion, disability, sexual orientation or any factor other than overall ability to perform. We apply that same standard when choosing suppliers, partners and anyone else we do business with.

FTIECLA is an amenable place to work with freedom from bullying, unlawful harassment or favouritism and with respect for privacy, dignity and life outside work. We will neither engage in nor tolerate physical, sexual, racial, psychological, verbal, or any other form of harassment or abuse. We ensure procedures are in place to detect failures to live up to this standard and to deal with them swiftly and effectively. This includes not only our behaviour but also circumstances to which we expose our employees, partners, clients, suppliers or vendors.

People working with us can expect adequate pay for doing their job and special rewards for extraordinary work. They can also expect constructive feedback and opportunities to learn and to develop while at FTIECLA.

We do our best to communicate honestly and openly with everyone who has an interest in our company, including colleagues, suppliers, clients and shareholders.

Everyone – whether they are employees, faculty, experts, contractors, clients, or visitors to our premises - should expect a safe and healthy environment in which to conduct business.

We report any breaches of the principles of the code of conduct to our manager or CEO. No action will be taken against any employee reporting actual or suspected violations regardless of whether or not the suspected violations are found to be valid.

## The Company

We avoid conflicts between the company's interests and our own, individual interests. Where there may be perceived conflicts, we ensure that these are appropriately disclosed and approved.

We don't work with suppliers or any third parties in ways that might affect our performance or our judgment about CLA's business.

We don't make personal investments in companies that compete with FTIECLA other than owning small amounts of stock in publicly-traded companies. We don't do business on behalf of FTIECLA with a company from which we or a member of our family may benefit.

In our personal capacities, we don't compete with any activity or business of the company, directly or indirectly, or use the knowledge gained here to help anyone else compete with us.

We take scrupulous care to maintain books and records that fairly reflect our business transactions as they occur. We don't conceal or confuse our records in any way. We don't make false or misleading entries. We take seriously our financial control policies, and we follow them.

We treat company property as if it was our own, but we remember it's not. We make sure it's taken care of and that it is not used for personal purposes except in special circumstances.

Whether using company property or personal devices, we meet company standards to protect our technology, data and content – as well as that of third-parties - and we don't share that kind of material with people outside or inside the company unless it's necessary and we're authorised to do so.

We protect and respect private and confidential information we hold on our colleagues, faculty, experts and those with whom we do business.

When we receive a question from the press about the company's business, we refer it to either the legal department or CEO and don't ever respond ourselves.

When we receive a legal claim, we alert either our legal department or CEO and we don't try to respond on our own.

Many of our people are enthusiastic users of social media. We ask that our people are open about who they are, but do not represent FTIECLA unless asked to do so and protect and respect private and confidential information. When we are promoting our products or services on social media, we must reveal our connection to FTIECLA.

## Suppliers, associates and other partners

We view our suppliers as partners, and our approach is to evaluate them equally, based on objective criteria such as price and quality and on intangible criteria such as their integrity and reliability.

We have a detailed policy to combat bribery and corruption which we expect all our people to understand and follow. We don't accept gifts or gratuities from current or would-be suppliers or other parties interested in doing business with us, when it may appear that the gift would influence a business decision. Likewise, we don't ever give money or gifts to gain influence for ourselves or for FTIECLA. We may give or receive gifts or entertainment of small value if they don't compromise us or the company, if they're disclosed, and if they are allowed by our gift policies and by local laws.

We respect all patents, trademarks, copyrights, proprietary information or trade secrets, as well as the confidentiality of anyone with whom we do business.

## Government and laws

We comply with the laws and regulations of any country in which we do business, and we don't seek or give influence in exchange for promises, gifts or any other inducements, no matter what the local business practices may be.

Our company is not partisan. We might make donations to a range of education or free-speech related causes, but none that are considered large enough to be material to the individual or organisation involved. We lobby on issues where the company can contribute our insight or which impact our ability to do business. We do not allow short-term commercial interests to override our primary responsibility to the clients. We comply with applicable laws and public disclosure obligations.

We always try to compete fairly and honestly, observing all laws that relate to the way that we engage with competitors.

## Our responsibility to society

Much of our business involves keeping faith with the public - as an education company dedicated to the purpose of training and learning. This public trust partly defines our company, and we will uphold it at all costs.

We are responsible to the communities in which we do business. We pay our fair share of taxes and play our part in encouraging and enabling our people to give time and money.

A significant contribution we make to society is helping address areas of unmet educational need. Many of the biggest global education challenges cannot be done by one company alone, so, we partner and collaborate with others to help inform, innovate and test new models of working, both commercially and through our charitable giving.

We support universal human rights, including equal employment, freedom of speech and of association, and cultural, economic and social well-being. We oppose illegal or inhumane labour practices.

We try to operate in a way that is sensitive to – and improves – the environment.



VanDyck Silveira  
CEO