

TITLE	CODE OF CONDUCT
<b>Objective</b>	Trinity College London expects all employees and individuals representing the interest of the Company, carry out their duties and activities associated with their work with the highest degree of professionalism.
<b>Scope</b>	<p>This policy applies to all our employees which for the purposes of this policy includes all employment types (such as fixed-term contracts etc.) as well as consultants/contractors, Panel Members and third-party employees such as agency employees. This policy aims to establish the standard of conduct that Trinity expects those groups to observe. It does not offer an exhaustive list of Trinity’s expectations.</p> <p>Where agency, temporary workers etc. who are not employees of Trinity College act contrary to this policy, then the agency or other entity providing that individual will be contacted and requested to take appropriate action and/or contracts terminated as necessary.</p>
<b>Policy Statement</b>	<p>All employees and those working on behalf of the company are expected to comply with this policy.</p> <p>The company expects all those employed to represent the company and act with respect and dignity, and work co-operatively to ensure the effective operation of the business</p> <p>Where an employee has a concern that the Code of Conduct has been breached, they will not be penalised for raising the matter in good faith. However, raising unfounded allegations with malicious intent is a serious disciplinary matter.</p> <p>The Company will endeavour to maintain confidentiality in respect of all concerns raised, where possible and appropriate.</p> <p>An employee should refer to their Trinity College Terms and Conditions of Employment for contractual information relating to their employment. However, it is the responsibility of every employee to familiarise themselves with, and to comply with, this policy. Employees should ensure that they</p>

	<p>are referring to the current version, which is available from People &amp; Culture. The Company reserves the right to amend this policy, without compensation.</p>
<p><b>Management Responsibilities</b></p>	<p>The Management of Trinity will ensure that employees are treated with dignity and respect and will ensure, within reason, that employees are secure in their jobs. The remuneration offered will be fair and competitive, and working conditions are healthy and safe.</p> <p>Employees, will be supported through effective work allocation and fair expectations, to have a work life balance that will enable them to fulfil their individual responsibilities outside of Trinity.</p> <p>Trinity will provide timely, appropriate and accessible education, learning and development opportunities to enable employees to develop and strengthen their skills and knowledge. Our employees will be treated fairly for employment, development, and promotion.</p> <p>Trinity will ensure that employees display, uphold and promote equality, diversity and inclusive behaviours, to develop a positive culture and working environment where all employees are supported and free from bullying and harassment.</p> <p>Trinity will create an atmosphere that ensures that employees can feel free to make suggestions and complaints.</p>
<p><b>Individual Responsibilities</b></p>	<p>All Trinity workers including consultants/contractors, Panel Members and third-party employees such as agency employees should follow our Employee Code of Conduct while performing their duties and are expected to behave in an appropriate manner showing respect for others and exhibiting the following behaviours:</p> <p style="text-align: center;"><b>A. Professionalism, job duties and authority of Trinity employees</b></p> <p>(i) All employees of Trinity must openly communicate with their colleagues, line managers and team members. Employees should be friendly and collaborative, building and promoting a friendly and collegial work environment.</p> <p>(ii) Trinity employees should fulfil their job duties with integrity and respect toward customers, stakeholders and the community.</p> <p>(iii) Employees must not abuse their employment benefits, such as the misuse of their allocated leave/time off,</p>

	<p>insurance, facilities, subscriptions or any other benefits that Trinity offers.</p> <p>(iv) Employees must always demonstrate integrity and professionalism, in and out of their physical workplace and location. When on Trinity business, employees are ambassadors for Trinity and must do nothing that might bring Trinity into disrepute.</p> <p><b>B. Behaviour outside the workplace</b></p> <p>(i) Employees' off duty hours are their personal concern, however they must not put themselves in a position where any duty to Trinity (whether contractual or duty of care to our beneficiaries) and their private interest conflicts.</p> <p>(ii) Employees must in all instances assume that their comments made on social media are public. Employees must ensure that, in their use of social media, they do not make comments about other employees, clients, candidates, beneficiaries or anyone else that could be perceived to be derogatory, abusive, damaging to the individual's or the organisation's reputation or amount to harassment, even where such comments are made outside working hours. They should be mindful that such comments could give rise to legal action. When expressing personal views, employees must not represent themselves as speaking or otherwise appear to speak for or on behalf of Trinity. The Trinity policy on social media should be followed.</p> <p>(iii) Employees may face disciplinary action if they break the law outside work in any way that would damage public confidence in Trinity especially if their continued employment may result in further damage or such acts may have a direct impact on their work.</p> <p><b>C. Compliance with law</b></p> <p>(i) All Trinity employees must comply with the laws and regulations of the countries in which we operate.</p> <p>(ii) We expect employees to be ethical and responsible when dealing with our finances, products, partners, clients, candidates, companies that provide us with various services or anyone else with whom Trinity have dealings.</p> <p>(iii) Employees should not, in their home countries or in other countries, undertake any activities that may have an unfavourable impact on Trinity, its partners, clients,</p>
--	---

	<p>candidates or beneficiaries. Such activities include but are not limited to:</p> <ul style="list-style-type: none"> <li>• theft</li> <li>• false representation</li> <li>• giving or accepting bribes receipt of an unreasonable level of gifts and hospitality</li> <li>• general misconduct</li> <li>• sexual misconduct</li> <li>• misusing their position to exploit vulnerable persons</li> <li>• any activity likely to bring Trinity into disrepute</li> <li>• undertake any other activity that may be seen as unprofessional</li> </ul> <p>(iv) Employees should inform their line managers, as soon as possible and in any event within 24 hours, if they are the subject of a criminal investigation or convicted of a criminal act.</p> <p><b>D. Respect in the workplace</b></p> <p>(i) Trinity employees should respect their colleagues. Trinity will not allow any kind of discriminatory behaviour, harassment or victimisation. Employees should conform to equality, diversity and inclusion best practice in all aspects of their work – especially in recruitment and performance management, training and development, and interpersonal relations.</p> <p><b>E. Protection of Company Property</b></p> <p>(i) All employees should treat Trinity’s property with respect and care. Employees:</p> <ul style="list-style-type: none"> <li>• Should not misuse company equipment</li> <li>• Should respect all property; this includes trademarks, copyright, information and reports. Employees should only use them to complete their job duties.</li> </ul> <p>(ii) Employees should protect Trinity’s facilities and other material property (e.g. laptops) from damage and vandalism, whenever possible.</p> <p><b>F. Conflict of interest</b></p> <p>(i) Trinity expects employees to always comply with its Bribery and Corruption Policy and avoid any personal, financial or other interests that might hinder their capability to perform their job duties. Offers of gifts and hospitality</p>
--	---

	<p>must be treated with caution whenever suggestion of improper influence could arise. Gifts and hospitality must not be extravagant and should not be taken from the same source on a frequent basis. If in doubt, employees should seek advice from their line manager or People&amp; Culture and refer to the Gifts and Hospitality policy.</p> <p><b>G. Policies</b></p> <p>(i) All employees should read and follow our company policies. If they have any questions, they should seek advice from their manager or People &amp; Culture.</p>
<p><b>Acceptable Behaviour at External Events and Meetings</b></p>	<p>The required standard of behaviour at normal place of work also applies to behaviour at external events and meetings.</p> <p>Employees must recognise that where such events require overnight stays, for examples at conferences, where an element of hospitality is provided for attendees, the Company expects a professional level of conduct at all times.</p> <p>Employees are responsible for maintaining the reputation of the Company and any behaviours that brings the reputation of Trinity College London into disrepute will be investigated and managed under the company’s Disciplinary Policy and Procedure.</p> <p>When employees are attending events and acting as a representative of the Company, especially where a level of hospitality is extended to include the provision of alcoholic drinks (for example wine with dinner), employees must limit the amount of alcohol they consume so that their behaviour remains within the scope of this policy.</p> <p>This is particularly critical at events being hosted by the Company and where our employees, officers and trustees will come under the scrutiny of a wider external audience.</p>
<p><b>Conflict of Interest Arising from a Personal Relationship with a Colleague</b></p>	<p>Trinity recognises that personal relationships do develop and exist between employees and that these are usually conducted in a manner that does not compromise fairness and equality of treatment within the workplace.</p>

	<p>In order to avoid any conflict of interest that may arise as a result of a personal relationship, Trinity must ensure that these are managed professionally so that both the Company and employees are protected. Issues that may result from a conflict of interest as a result of a personal relationship include, but are not limited to:</p> <ul style="list-style-type: none"><li>• perceived lack of fairness to other team members, for example in:<ul style="list-style-type: none"><li>○ decisions regarding salary review;</li><li>○ promotion and recruitment opportunities;</li></ul></li><li>• fairness when conducting disciplinary, performance, grievance, harassment and bullying and attendance management meetings;</li><li>• negative effects of productivity</li></ul> <p>For the purposes of this policy a ‘personal relationship’ is defined as any relationship which continues outside the workplace which might be perceived by a third party as a potential source of conflict of interest.</p> <p>Where a personal relationship exists, develops or ends, this may give rise to a conflict of interest. People &amp; Culture and an appropriate senior line manager (i.e. more senior manager outside of the relationship) must be informed of a personal relationship so that appropriate business decisions may be taken to safeguard the Company and the employees. Openness is encouraged, and every effort will be taken to discuss any issues with both employees and their senior line manager.</p> <p>Failure to disclose a personal relationship will be considered a breach of Trinity’s Code of Conduct, where the Company reasonably believes one or both parties have received preferential treatment because of the relationship. In such circumstances one or both parties may be subject to disciplinary action.</p> <p>Where a personal relationship is within a reporting line and it is agreed by the relevant member of the Executive Team and People &amp; Culture that the reporting line will continue, appropriate safeguards will be put in place to ensure that decisions regarding employment, e.g. salary review, promotion etc are not solely the responsibility of the line manager in the relationship.</p>
--	---

<b>Reporting Unacceptable Behaviour</b>	<p>Trinity does not tolerate any unacceptable behaviour towards its employees or to any of its partners, clients, candidates, service providers or others with whom we come into contact.</p> <p>Trinity employees are encouraged to report all negative behaviours towards them or towards other colleagues or partners/stakeholder they may have witnessed. Such reports must be made to their line manager or a management team member or any other member of the management team or to People &amp; Culture, so that appropriate actions can be taken.</p>
<b>Disciplinary Actions</b>	<p>Trinity may take disciplinary action against employees who intentionally or repeatedly fail to follow this Code of Conduct.</p> <p>Should there be any discrepancy between this Code of Conduct and applicable employment legislation, the legislation shall prevail.</p>
<b>Notes</b>	<p>This policy is subject to review at the discretion of Trinity College's Executive and/or as required by changes to legislation.</p>
<b>Effective Date</b>	<p>1<sup>st</sup> June 2010</p>
<b>Review Date</b>	<p>Reviewed July 2017  Reviewed October 2018  Reviewed January 2021</p>