

Policy 31 - Code of Business Ethics



Excellence in Learning, Development and Training

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GENERAL STATEMENT

This Code of Business Ethics sets out the standards we expect from our employees in their internal and external dealings with colleagues, fund-holder and third parties.



BASIC STANDARDS OF CONDUCT

We will conduct every aspect of our business with honesty, integrity and openness, respecting human rights and the interests of our employees, customers and third parties. We will respect the legitimate interests of third parties with whom we have dealings in the course of our business.

We will maintain the highest standards of integrity - for example, we will not promise more than we can reasonably deliver or make commitments we cannot or do not intend to keep.



EMPLOYEES

We are committed to:

- a. developing a workforce where there is mutual trust and respect, free from bullying and harassment, where every person feels responsible for the performance and reputation of our company
- b. respecting the rights of individuals, their customs and traditions and their right to freedom of association and the right to decide whether or not to join a trade union. We will negotiate in good faith with properly elected representatives of our employees
- c. recruiting, employing and promoting employees on the basis of objective criteria and the qualifications and abilities needed for the job to be performed in line with our Equal Opportunities Policy
- d. maintaining good communications with employees through our information procedures
- e. providing our employees with suitable training and assisting them in realising their potential
- f. ensuring the privacy and confidentiality of our employees' personal information is respected
- g. suitably rewarding our employees for their contribution to the success of the business
- h. providing mechanisms whereby employees can raise legitimate concerns confidentially regarding malpractice and ensuring no one will be victimised for a report made in good faith
- i. providing employees with the appropriate information and training to comply with this Code and the associated policies
- j. seeking to protect our employees from third party abuse that might be injurious to their safety, health or wellbeing



BUSINESS INTEGRITY

We aim to develop strong relationships with our learners, fund-holders and others with whom we have dealings, based on mutual trust, understanding and respect.

In those dealings, we expect those with whom we do business to adhere to business principles consistent with our own.

We will conduct our operations in accordance with the principles of fair competition and applicable regulations.

LD Trainings accounting and other records and supporting documents must accurately describe and reflect the nature of the underlying transactions.

No unrecorded account, fund or asset will be established or maintained.

We will comply with the laws and regulations applicable wherever we do business. We will obtain legal advice where felt necessary to comply with this commitment.

We will review and track our business risks including social and environmental risks.

LD Training will not facilitate, support, tolerate or condone any form of money laundering.

To ensure that our business is run in an ethical and effective manner we will maintain internal controls.



NATIONAL TRADE

We will seek to compete fairly and ethically within the framework of applicable competition and anti-trust laws and we will not prevent others from competing fairly with us.



PERSONAL CONDUCT

All employees are expected to behave in accordance with the principles set out in this Code of Business Ethics.

Employees are expected to protect and not misuse company assets such as buildings, vehicles, equipment, and monies.

Employees are expected to use email, internet, IT and telephones in a manner appropriate for business purposes in line with the principles contained in this Code and any applicable IT policies.



BRIBERY

No Group employee or individual or business working on our behalf must accept or give a bribe, facilitation payment or other improper payment for any reason.

This applies to transactions with government officials, any private company or person anywhere in the world. It also applies whether the payment is made or received directly or through a third party.

LD Training shall ensure that adequate procedures are in place to prevent the risk of bribery and that these are effectively communicated and implemented across the Company in line with the requirements of the Bribery Act 2010 and as set out in the Anti-Bribery Policy.



GIFTS, ENTERTAINMENT AND IMPROPER PAYMENTS

Accepting or giving any entertainment or gift that is designed to, or may be seen to influence business decisions, is not acceptable. No LD Training associate or employee shall offer, give, seek or receive, either directly or indirectly, inducements or other improper advantages for business or financial gain. If an employee or associate is in any doubt as to whether he or she may accept an offer, that employee/associate should discuss the issue the Director.

Any gift or hospitality given or received by an employee/associate should be reported for inclusion on the LD Training Gifts and Hospitality Registers. In the UK this applies to any gift or hospitality with an estimated or actual value of £50 or more.



CONFLICTS OF INTEREST

Whilst we respect the privacy of our employees, all LD Training employees/associates are expected to avoid personal relations, activities and financial interests which could conflict with their responsibilities to LD Training.

LD Training employees/associates and consultants must not seek gain for themselves or others through misuse of their positions or company property.

All actual and potential conflicts (including those arising from the activities or interests of close relatives or partners) should be disclosed to and discussed with the Director.



CONFIDENTIALITY

Information received by anyone in the course of his or her employment must not be used for personal gain or for any purpose other than that for which it was given.

Where confidential information is obtained in the course of business that confidentiality must be respected.



HEALTH AND SAFETY

We are committed to creating and maintaining a safe and healthy working environment for our employees/associates, learners, partners and the community.

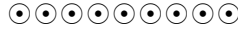
Our commitment to ensuring the safety and security of our employees is set out in our Injury Prevention and Security policies.

We strive to avoid emergency situations but recognise the need to be prepared. We are committed to having effective emergency response procedures in place.



THE ENVIRONMENT

LD Training is committed to making continuous improvement in the management of its environmental impact as set out in our Environmental Policy.



CUSTOMERS

LD Training is committed to providing safe, , high quality, consistent, accessible and reliable services to its learners.

All employee/associates are expected to behave respectfully and honestly in all their dealings with customers and the general public in accordance with the principles set out in this Code.

In particular we will safeguard and protect the welfare of vulnerable people who come into contact with our employees/associates. Employees/associates will be made aware that they hold a position of trust and that they must at all times maintain the highest standards of personal conduct that reflects this trust being placed with them.



COMMUNITY INVOLVEMENT

We are committed to fostering good relationships with the communities in which we work and building community partnerships that deliver positive change.

