



Faculty of Languages
Code of Business Conduct

I– Applicability

This Code of Business Conduct applies to all tutors, officers, employees, contract workers and agents of October University for Modern Sciences and Arts (MSA University), its divisions, and affiliates.

This code is not a contract of employment.

II– Decision–Making; Operation of the Code

Core Values

First, we must base our decisions and actions on our core values of **Fairness**, **Individual Accountability**, **Cost Consciousness** and **Integrity**.

- We will not tolerate fraud, deceit, concealment.
- Our decisions must be based on factual evidence and fairness, not bias or prejudice.
- Our decisions must be based on strict principles of right and wrong as defined set forth in this code.

Compliance with code

Second, we all must comply with this code, which is intended to support us in making good decisions and taking the right actions, to help keep us from doing the wrong thing, and to help us comply with the laws, rules, regulations that apply to our business.

- We are all expected to understand how this code applies to our own jobs and business decisions and activities – or if we don't understand, we must get help with our questions (Pages () indicate where to go with questions or concerns.)
- All persons covered by this code are expected to demonstrate integrity and leadership by complying with the code themselves, promoting, and boosting compliance by others.
- Promotion of, and adherence to, this code are elements in evaluating the performance of everyone to whom this code applies.

Disclosure Program

MSA University recognizes that many decisions are not easy. So, any time we have a difficult decision to make, or we don't understand how the code applies in a particular case, we should ask for advice and guidance. If we become aware of any violations or potential violations of the code, or if we have complains or concerns regarding accounting, internal accounting control, or auditing matters, we must promptly and immediately notify the appropriate persons as indicated in the following page () or via the "RED BOX"– *these are well recognized boxes for receiving complains, violation notifications, and potential violation notifications. These boxes are colored in red and labeled with the sentence "thanks for your help", these boxes are available everywhere in the campus (5 for each building).*

– For any questions or concerns about interpreting or applying this code, or any related MSA University standard, procedure, policy, or instructions, please contact:

- 1) –Your manager, Supervisor, Department head, the faculty Vice Dean, or the faculty Dean.
- 2) – Another manager, Supervisor, or Department head.
- 3) – A Human Resources representative.
- 4) – An attorney/ notary/ Lawyer in the legal Division.
- 5) – The Head of Quality Assurance Department.
- 6) – The University Vice President.
- 7) – The University President.

MSA University will not tolerate retaliation against anyone who makes a good faith report regarding violation or potential violation of the code.

Any reports, concerns or complains are kept confidential to the possible extent while still allowing MSA University to investigate and take appropriate action.

III – Honest and Ethical Conduct

Principle 1: FAIR DEALING

We will deal honestly and ethically with MSA University and with MSA University's staff, employees, students, workers, suppliers, customers, and competitors.

We will treat people fairly. We must not take unfair advantage of anyone through manipulation, concealment, abuse of privileged or otherwise undisclosed information, misrepresentation of material facts or any other unfair-dealing practices.

WE WILL DEAL HONESTLY AND ETHICALLY WITH MSA UNIVERSITY ON BEHALF OF MSAUNIVERSITY ALL MATTERS.

Principle 2: AVOIDING CONFLICTS OF INTEREST

A conflict situation can arise when one of us takes action or has interests that may make it difficult to perform our MSA University work objectively, effectively and efficiently.

We must avoid any investment, interest, or association that interferes or might interfere with the independent exercise of our own individual best judgment, and with our obligation to perform our responsibilities in the best interests of MSA University.

WE WILL AVOID ACTUAL OR APPARENT CONFLICTS WITH MSA UNIVERSITY'S BEST INTERESTS.

For example:

Private business (ex. Training agency, any educational institute or service provider, Private paid teaching classes etc.)

Principle 3: MSA UNIVERSITY OPPORTUNITIES

When presented with opportunities related to MSA University's business interests, we must first offer those opportunities to MSA University.

We will **not**:

- (a) Take for ourselves personally, or for members of our household or close relatives, opportunities that are discovered through the use of MSA University property, information or position.
- (b) Use MSA University property, information, or position for personal gain; or
- (c) Hold any employment, managerial, directorial, consulting or other position with any company or university which is a competitor of MSA University.

WE WILL ADVANCE MSA UNIVERSITY'S BUSINESS INTERESTS WHEN THE OPPORTUNITY TO DO SO ARISES.

Principle 4: GIFTS, MEALS AND ENTERTAINMENT

We will not seek, accept, offer, promise, or give (directly or indirectly) anything of value – indicating payments, fees, loans, services, entertainment, favors or gifts – from or to any person/ student or firm as a condition or result of doing business with MSA University.

WE WILL COMPLY WITH MSA UNIVERSITY'S STANDARDS, POLICIES, INSTRUCTIONS, AND PROCEDURES REGARDING GIFTS, MEALS, AND ENTERTAINMENT.

Principle 5: PROTECTION OF CONFIDENTIAL INFORMATION OF CUSTOMERS/STUDENTS AND OTHERS

We must not accept non-public information provided by a customer/student, supplier or other party with the condition or understanding that it kept confidential unless such information is subject to a written confidential disclosure agreement or confidentiality: provision drafted or approved by the Legal Division.

We must maintain the confidentiality of information entrusted to MSAUniversity by a customer/ student/ staff member or other third party, except when disclosure is legally mandated as determined by the Legal Division.

We must not seek or accept confidential information of or about competitor in an illegal or unethical manner.

If we have confidential information about a former employer or any other entity with which we were previously affiliated, we are expected to abide by our obligation to keep such information confidential. MSA University will not require and does not want us to use or disclose such information in our capacity as a tutor or employee of MSA University.

**WE WILL PROTECT THE CONFIDENTIAL INFORMATION OF CUSTOMERS/
STUDENTS, SUPPLIERS AND OTHER PARTIES WHICH WE RECEIVE IN THE
COURSE OF CONDUCTING MSA UNIVERSITY BUSINESS.**

IV – Compliance with Laws

Principle 6: COMPLIANCE WITH LAWS

We are required to familiarize ourselves with all the laws, rules and regulations that apply in the areas within the scope of our work responsibilities, including, as applicable, the following areas:

- Official Leave(s)
- Academic Promotions

- Academic Degrees
- Deductions & Penalties
- Disciplinary Actions

Contact the Legal Division for advice in any area where you have any questions.

**WE WILL COMPLY WITH ALL LAWS, RULES AND REGULATIONS
APPLICABLE TO OUR WORK RESPONSIBILITIES IN MSAUNIVERSITY.**

V – Compliance with MSA University Standards, Policies and Procedures

Principle 7: COMPLIANCE WITH MSA UNIVERSITY STANDARDS, POLICIES AND PROCEDURES

We will comply, for example, with applicable University Policies, and applicable policies and procedures issued by Departments of Human Resources, Purchasing, University Regulatory and Quality Assurance, Finance, IT, Training & Development, etc.

**WE WILL COMPLY WITH ALL MSA UNIVERSITY STANDARDS, POLICIES
AND PROCEDURES APPLICABLE TO OUR WORK RESPONSIBILITIES.**

VI – Protection of Employees and Resources

Principle 8: PROTECTION OF MSA UNIVERSITY'S ASSETS

We must safeguard MSA University's assets against loss, damage, carelessness, waste, misuse and theft.

MSA University's assets, such as intellectual property, electronic media, work time, equipment, funds, products and services, are intended for legitimate business use.

We must use MSA University's assets efficiently and for legitimate purposes, never for illegal or unethical purposes.

WE WILL PROTECT MSA UNIVERSITY'S ASSETS, AND PROMOTE THEIR EFFICIENT AND LEGITIMATE BUSINESS USE.

Principle 9: PROTECTION OF MSA UNIVERSITY'S CONFIDENTIAL INFORMATION.

The disclosure of confidential information regarding MSA University's business, financial, legal, regulatory or scientific operations, whether intentional or accidental, can adversely affect the financial stability and competitive position of MSA University and the job security of its employees.

"Confidential Information" means all non-public information in MSA University's possession, whether through internal or external development, that might be of use to competitors, or harmful to the financial stability or competitive position of MSA University if disclosed, including but not limited to:

- Personal data

- Customer lists
- Financial, accounting data
- Suppliers data (names of suppliers, pricing, source of supply, and anticipated requirements)
- Results of Regulatory inspections/ audit
- Business Plans, and updates to business plans
- Potential business agreements, licenses, partnership, accreditation, or other business deals
- Regulatory filings and approval dates
- Marketing and sales information
- Equipment
- Computer software
- All other know-how trade secrets

WE WILL PROTECT MSA UNIVERSITY'S CONFIDENTIAL INFORMATION.

Principle 10: EMPLOYEE HEALTH AND SAFETY

MSA University is committed to protecting the health and safety of its employees.

We will act promptly to address any unhealthy or unsafe condition.

This includes taking steps to protect the physical safety and security of MSAUNIVERSITY employees.

To meet this goal, each employee has responsibilities. We need to follow health and safety requirements. But beyond that, each of us must observe established safe work practices to ensure our own safety and that of our co-workers. This

includes reporting to work free from the influence of drugs or alcohol that could impair one's ability to work safely and conscientiously.

If you are involved in, or know of, an accident or dangerous situation, it is your duty to report it to management promptly and, when appropriate, take corrective action.

WE WILL PROTECT HEALTH AND SAFETY OF MSA UNIVERSITY EMPLOYEES.

Principle 11: ELECTRONIC MEDIA USAGE

MSA University provides access to and use of electronic mail, the intranet, the internet, and other electronic media for business purposes. We do this to make it easier for MSA University employees to communicate with each other and with appropriate outside parties – including students, customers, suppliers, business partners, affiliates, and government agencies.

We must not use MSA University's electronic media for any other purposes that violate applicable laws, rules and regulations or MSA University standard, policies or procedures. This includes transmission of threatening, obscene or harassing materials.

Incidental personal use of electronic media that does not interfere with MSA University's business or an employee's performance of his or her responsibilities

is acceptable, as long as such use does not include illegal, unethical or otherwise offensive subject matter.

Except as otherwise provided by applicable law, no officer or employee has any right to privacy regarding use of or access to any electronic media provided by or through MSA University. MSA University may monitor or access tutor or employee use of its electronic media at any time in accordance with applicable law.

WE WILL USE MSA University's ELECTRONIC MEDIA FOR LEGITIMATE BUSINESS PURPOSES.

Principle 12: HARASSMENTS

All different types of harassments unfairly harm people by targeting personal characteristics such as race, color, religion, age, gender, national origin, disability or marital status.

Bullying: Undermines an individual or group through persistent negative attacks. There is a typically irrational abuse of power or position that can manifest itself in physical, verbal or non-verbal forms.

Stalking: It involves pestering an individual, either in person or in writing or electronic formats or on the telephone causing them distress.

Religious: Unwanted and unacceptable behavior based on religious beliefs or practices.

Cases of Physical Assault: A criminal offense and if you have been attacked, it is important that you seek help immediately.

Racial: Unwanted behavior based on race or national origin. It includes written or verbal threats or insults based on race, ethnicity or skin color, abusive comments about racial origins, racist jokes, damage to property, etc.

Sexual Orientation: Behavior includes name-calling, stereotyping, assault, verbal abuse, actual or threatened unwanted disclosure of sexuality.

Sexual Harassment: This may be physical such as touching, groping, staring etc.

WE WILL NOT INITIATE ANY ABUSE OR HARASSMENT OF ANY TYPE.

Principle 13: ABUSE OF SUBSTANCES

Abuse of alcohol, drugs or other substances, misuse of medications and administration of any type of narcotics (ex. Cannabin or its derivatives) that can diminish job performance and can compromise the safety of others.

WE WILL NOT ABUSE ALCOHOL, DRUGS, MISUSE OF MEDICATIONS, OR ADMINISTER NARCOTICS, CANNABIN OR ANY OF ITS DERIVATIVE.

Principle 14: PROMOTING SOMEONE'S STUFF

MSA Employees are required to use only:

- 1– MSA official Emails for any formal or casual communication related to their business.
- 2– Stationary and stuff (office stationary, mugs, glasses, cups, block notes, pens, mouse pad, etc.)
- 3– MSA official paper with the appropriate header and footer for official communication.

VII – Accountability for Adherence to CODE

Each of us is responsible for our decision making and for adherence to the principles set forth in this Code.

Internal Investigations

MSA University will promptly investigate all alleged violations of this Code, or of any related MSA University standard, policy or procedure. Any allegations will be treated confidentially, to the extent consistent with MSA University's interests and its legal obligations.

We are all expected to cooperate in the investigation of an alleged violation of the Code.

If MSA University determines that corrective action is necessary to fix a problem and avoid the likelihood of its recurrence, MSA University will promptly decide what steps to take, including legal proceedings when appropriate.

Disciplinary Action

To the extent legally permissible under applicable law, appropriate disciplinary action will be taken, in relation to this Code or any related MSA University standard, policy or procedure, for:

- Authorization of or participation in violations
- Failure to report a violation or potential violation
- Refusal to cooperate in the investigation of an alleged violation
- Failure by a violator's supervisor(s) to detect and report a violation, if such failure reflects inadequate supervision or lack of oversight
- Retaliation against an individual for good faith reporting of a violation or potential violation

Disciplinary action may, when appropriate, include dismissal.

Certification

All officers and employees must certify, in writing or electronically, that they have received, read, understood, and shall abide by this Code.