



CAMBRIDGE
UNIVERSITY PRESS

Code of Ethics

Cambridge University Press is part of the University of Cambridge. We are an organisation that exists for the public benefit, to advance knowledge, learning and research.

We are funded through our global publishing activities in highly competitive markets across the world. We need to be profitable in order to generate the surplus that will allow us to grow and support our mission.

Our conduct, and our standards of integrity, should at all times reflect our public aims, our proud tradition and the values of the great University of which we are a part. Our performance should never be achieved at the expense of high ethical standards.

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The mission of the University of Cambridge is to contribute to society through the pursuit of education, learning and research at the highest international levels of excellence. As part of the University, Cambridge University Press develops and produces a wide range of products and services for teachers, students and researchers which align with the University's mission and our purpose. We disseminate these products through our trading activities in highly competitive markets spanning the globe. Such activity ensures that our output is as widely available as possible, makes a real impact and generates funding that enables us to sustain our core purpose in the years ahead.

As we produce and publish content around the world, our conduct and standards of integrity should at all times reflect our public aims, our proud tradition and the values of the great University of which we are a part. Our purpose should never be achieved at the expense of the highest ethical standards.

Our Code of Ethics reflects these standards and sets expectations for everyone working here and our partners. This year we are issuing an updated Code, further clarifying the standards underpinning our work and providing guidance both for us and for our external partners so that we can be as transparent as possible about the principles that guide our decisions.

We are now supplementing our statements on business ethics with a new section on publishing ethics which sets out our commitment to academic freedom and freedom of expression as well as our support for the international copyright law framework.

Please read this updated Code of Ethics, even if you have read the previous versions. Everyone at the Press has a duty to understand and observe the Code of Ethics, and the policies and procedures which underpin it, in everything we do. Each one of us needs to confirm we have been through and understood it. Versions are available in English, Spanish, Portuguese, Chinese and Japanese.

Thank you for your continued help in ensuring our standards support the Press's purpose.

A handwritten signature in black ink that reads "Peter Phillips". The script is fluid and cursive.

Peter Phillips
Chief Executive

Purpose and Values

The core purpose of the Press is to advance knowledge, learning and research worldwide. How we fulfil that is evolving as we engage with researchers, students and teachers digitally to help solve their problems. Increasingly, we fulfil our purpose by helping unlock their potential with the best learning and research solutions.

Our purpose is underpinned by six values:

Responsive to customers

- We connect with our customers to understand their needs and pressures
- We put our customers' needs at the heart of everything we do
- We communicate, frequently, clearly and with integrity to aid understanding

Collaborative

- We foster a deeply inclusive, connected culture throughout our organisation
- We work across all functions and locations, to create strength from our diversity
- We are open to partnerships with organisations that can progress our vision

Empowering of our teams

- We support each other to take appropriate risks so we can deliver with speed and integrity
- We encourage each other to share our expertise and experience for the benefit of everyone
- We challenge ourselves to deliver solutions that our competitors wished they had thought of

Fast and effective in our decision making

- We act with urgency, involving the right people to create the most effective outcomes, even with ambiguous and incomplete information
- We draw on our expert knowledge and experience to deliver individual and personalised solutions for our customers
- We make use of our global presence to bring together people with the right expertise to achieve a world-class level of excellence

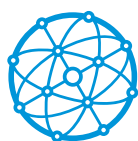
Entrepreneurial and innovative

- We embrace change and welcome creative ideas and suggestions
- We are not afraid to try new and entrepreneurial approaches to work
- We seek new opportunities to drive sales and increase efficiency

Responsible and with high integrity

- We act with integrity and accountability, protecting the Press's reputation by adhering to its policies and codes
- We spend money and make other financial commitments with the same care as if it were our own
- We use our profit for purpose, contributing to the greater good of society

This Code of Ethics is designed to support our mission, values and behaviours by addressing specific areas of our business where it is particularly important for us to understand explicitly what those high standards mean, and to provide further support, through linking to our detailed policies relating to each area.



Introduction to the Code

Who does this apply to?

All of us employed by the Press, whether full-time, part-time or temporary workers (such as consultants or contractors), no matter where they are located or what they do, must act in accordance with this Code of Ethics.

Third parties who work with the Press must adhere to our separate [Third Party Code of Conduct](#). Relevant third parties include:

- joint venture partners;
- freelancers and contract workers;
- third parties who perform services for or act on behalf of the Press, such as agents, distributors, suppliers anywhere in the world (collectively, “third parties”).

In addition, our expectation is that authors, learned societies, and editorial contributors that we work with will also be held to high ethical standards, including following our Publishing Ethics Guidelines. We reserve the right to cease working with any author, learned society or editorial contributor where we have concerns about their ethical conduct, whether towards our colleagues, the general public, or our content.

What are the key standards?

Each section in this Code provides further details of the standards that we expect people associated with the Press to uphold. A high-level summary is provided here:

- We are committed to the principle of academic freedom and the right to make free and objective editorial decisions based solely on an assessment of quality and the needs of those in the communities that we serve;
- We do not tolerate any form of bribery or corruption, including facilitation payments;
- Limited and appropriate gifts, hospitality or travel expenses will be offered to or received from third parties out of respect and appreciation or for legitimate business travel only, and not to influence or appear to influence a business decision;
- Marketing and sponsorship will not be used to influence or appear to influence a business decision;
- We support charitable activities as part of our commitment to Corporate Social Responsibility but will not use them to influence sales activities;
- We will not make political donations, and any focused political lobbying efforts will be directly related to our publishing activities and must be approved by the Chief Executive;
- Conflicts of interests will be transparently recorded and managed;

- Due diligence is an important and necessary tool for understanding our prospective employees, third parties with whom we transact business, and high-value transactions;
- We take appropriate actions to prevent fraud within the Press;
- Press trading activity will comply with relevant trade laws and will reflect appropriate environmental standards;
- We do not tolerate any form of modern slavery;
- We respect our employees and treat them with the highest standards of integrity;
- We recognise the right of our colleagues to be treated with dignity and respect and work in an environment free from harassment, bullying, and discrimination from any colleagues or third parties they deal with during the course of their employment;
- We recognise the right of all third parties that we work with, including authors, editors and customers, to also be treated with dignity and respect, free from harassment, bullying and discrimination;
- We process and access personal information in accordance with applicable law;
- We give our employees safe ways to raise concerns, both internally and externally, about activities that do not reflect our ethical standards.

What support is provided to enable compliance with these standards?

In addition to this Code, as part of our overall approach to business ethics, the Press’s [ABC Policy](#), [Data Protection Policy](#), Publishing Ethics Policies [[Academic Research / Teaching and Learning](#)] and associated procedures and guidelines reflect in further detail the relevant subject areas addressed in this document. If you are a manager, we ask you to lead by example and to make sure not only that those who work with you are aware of the guidelines, which are prominently available on the “[Our Ethics](#)” intranet page, but also that your team behaves in a manner which lives up to our expected standards. Please read and absorb the various materials, particularly if you are in a role which entails regular interactions with third parties. Please direct any questions you may have to your line manager, your local HR officer, or the Compliance Team.

Training and communication will be provided to inform third parties and colleagues about the policies referred to in this Code of Ethics, and monitoring and review procedures will be put in place to ensure proper engagement. Failure to comply can lead to disciplinary action resulting in summary dismissal and could carry personal criminal liability for the individuals concerned.

Part One: Business Ethics

Bribery & Corruption

The Press takes a zero-tolerance approach to bribery and corruption in any form. A bribe is a benefit or anything of value offered, promised or given to another person or entity in order to obtain or retain a commercial advantage, or to reward the recipient for acting improperly. Bribes can take the form of cash payments or cash equivalents, gifts and hospitality, charitable or political contributions, facilitation payments, unwarranted allowances, excessive commissions, or anything else of value. Bribery is considered a form of corruption; corruption encompasses other illegal acts undertaken by a business or its employees such as extortion, fraud and money laundering. Whilst there is no universally accepted definition of corruption, Transparency International defines corruption as “the misuse of entrusted power for private gain”.

As an international organisation, the Press is bound by a range of international anti-bribery and corruption ('ABC') laws, some of which apply across borders (collectively, 'ABC Laws'). For example, the UK Bribery Act 2010 now makes a UK-based company and its international subsidiaries or joint venture partners liable for failure to implement adequate bribery prevention procedures. This liability extends not only to the actions of employees, but to the conduct of third parties that act on the company's behalf. Indeed, there have been recent cases where prominent international publishers have suffered huge financial penalties for corruption, including bribery.

Facilitation payments

Facilitation payments are any payments (no matter how small) given to encourage the performance, or to speed up the performance, of an existing duty. For example, they could include “grease payments” to customs officials to speed up the importation process or to a local government official to arrange connection to local utilities such as water, electricity or telephone. Facilitation payments are forbidden under the Press's policies; the Press will not tolerate or condone the making of any such payment (no matter how small) by any employee or third party acting on its behalf. Our [ABC Policy](#) includes further guidance on dealing with requests for facilitation payments.

Gifts, Hospitality and Travel

Our [ABC Policy](#) includes further guidance on handling gifts, hospitality and travel expenses (GHT) to or from third parties. GHT should not be offered, given, promised, requested, accepted or authorised by

employees or third parties where it could influence or appear to influence a business decision, or where it might compromise or reasonably be seen to compromise the receiver's judgement, integrity or impartiality.

All GHT offered or received, of whatever value, must in every case be appropriate, proportionate, traceable and transparent. It is inappropriate to offer or accept hospitality that is disproportionately lavish, a gift that is of significant value, or travel expenses more generous than you as a Press employee are allowed to claim.

The [GHT Procedure](#) that accompanies the [ABC Policy](#) provides examples of legitimate gifts and hospitality which are a natural part of business development, and those which could be deemed corrupt. It also sets thresholds at which GHT should be transparently declared, recorded and approved prior to proceeding.

Marketing & Sponsorship, Charitable & Political Giving, and Conflicts of Interest

Marketing and Sponsorship

Our [ABC Policy](#) includes further guidance on sponsorship and marketing activities. All marketing and sponsorship activities must be conducted ethically, with integrity and transparency and in full compliance with applicable laws, regulations, adopted industry codes of practice and Press policies. Marketing materials must describe our products in a fair and balanced way without misleading the public about the benefits of a product or its limitations.

Charitable Giving and Fundraising

The Press acts at all times in accordance with the University's mission and our core purpose. In accordance with our UK Charities Policy, any use of Press money or resources which does not further our purpose should be avoided.

Because charitable donations could be used as a means to bribe or influence others, all Press charitable giving and fundraising activities must be conducted ethically, with integrity and transparency, and in full compliance with applicable laws, regulations, adopted industry codes of practice, and Press policies. Donations should

not be used in the furtherance of sales activities and should support our Corporate Social Responsibility initiatives only. Any charitable donation should be made with the proper approvals according to the Press's authority framework.

Political Donations and Activities

Political donations could be considered bribery of a public official, which is strictly prohibited by Press policy and under ABC laws. Any focused political lobbying efforts conducted by the Press, will be directly related to our publishing activities and must be approved by the Chief Executive. The Press does not participate in other political activities, nor does it make donations or provide resources to support any political purpose.

Conflicts of Interest

A conflict of interest occurs when someone is faced with a situation where his or her judgment could be unduly influenced by the involvement of that individual, a relative or close friend, or when there is some other reason why a financial or personal advantage might accrue to them or someone close to them as a result of a decision or action. The Press monitors conflicts of interest so that its employees and partners can make balanced and impartial decisions.

Other conflicts of interest may arise where employees have an additional external commitment that could interfere with their role at the Press, or where family or other personal relationships within the workplace could affect their performance.

While the Press cannot prevent conflicts of interest from arising, Press employees and/or third parties must be open and transparent about any actual/potential or apparent conflicts of interest by declaring them to the Compliance Team so that they can be managed. It would not be prudent for the Press to make a rule which says that one must never do business with a company which employs a close relative, for instance; but we can and do insist that this is brought to our attention and explored with relevant employees so, where possible, we can ensure that we proceed in a manner which does not impair good and sound business judgment. If the conflict is such that one's judgment is likely to be impaired, the handling of the transaction or relationship should be passed to someone else. Where this is not possible, the Press will need to consider other actions to manage the situation.

Our [ABC Policy](#) states that our personal activities and interests outside the Press must not result in actual, apparent or potential conflicts of interest with our professional duties and decisions as Press employees. If in any doubt, consult your line manager, your local HR officer or the Compliance Team at the earliest opportunity. The Compliance Team is responsible for upholding the [Conflicts of Interest Procedure](#) and if a conflict were to arise, the Compliance Team would review each case on its merits, working in conjunction

with the relevant business stakeholders. If in doubt, it is always better to declare a potential conflict of interest to the Compliance Team at the earliest opportunity.

Compliance Due Diligence & Ethical Trading

Compliance Due Diligence

In order to ensure compliance with relevant ABC laws and its own policies, before entering into an agreement or a transaction with another party, it is crucial that the Press take appropriate steps to understand more about that party, especially where the party will be acting on behalf of the Press.

Our [ABC Policy](#) includes further guidance on the Press's proportionate approach to Compliance Due Diligence for three types of risk: employee risk, third-party risk and transaction risk.

Employee Risk

Pre-screening of potential employees, the inclusion of appropriate clauses in employment contracts, and annual review and regular training for existing employees will help to ensure that the Press can mitigate potential ABC risks arising from an employment relationship and that employees understand the Press's zero tolerance for bribery and corruption.

Third-Party Risk

The Press recognises the importance of third parties to our business globally. Nonetheless, the Press's commitment to the prevention of bribery and corruption means that we must ensure that the people acting on our behalf do so in compliance with our [ABC Policy](#). Therefore, the Press is committed to understanding the risk associated with those third parties we propose to engage, before that engagement is formalised, by undertaking Compliance Due Diligence along with other procedures and risk mitigation measures contained in the Press's [Approvals & Authorisation Framework](#) and other policies (i.e. the [Sustainable Procurement Policy](#)).

We must not engage a third party that we know is, or suspect may be, paying, offering or accepting bribes to perform services for or on behalf of the Press. In particular, employees must not engage public officials as an incentive or reward for their past, present or future willingness to recommend, purchase, pay for, authorise, approve, supply or use any product or service sold or provided by the Press, or to obtain any other business advantage for the Press.

Transaction Risk

Some high-risk transactions (such as government-funded tenders, joint ventures, and acquisitions) will require further due diligence, which may involve independent investigation. The [ABC Policy](#) provides further instruction on appropriate Compliance Due Diligence procedures before entering into a high-risk transaction.

Economic Sanctions and Market Restrictions

The Press must comply with international sanctions regimes applying to the countries in which we trade and with international treaty organisations. In some cases our banking partners set further restrictions on our ability to trade with certain countries and individuals. We will at all times interpret sanctions laws in the light of our mission to advance learning, knowledge and research.

The Press must also ensure compliance with laws or regulations regarding competition, agency arrangements and public procurement. Anti-competitive practice could include discussing our pricing policy with another publisher. If any staff member has any doubt about dealing with a particular partner, or doing business in a particular country, or proceeding with a particular practice or transaction, please consult the Press's Legal & Business Affairs Department for advice before going further.

Ethical Trading

As well as observing the highest standards in relation to bribery, corruption, and conflicts of interest, Press employees are expected to behave ethically in all of their business transactions, both internally and externally.

Any suspicion of fraud, or fraudulent behaviour, will be immediately and vigorously investigated and if substantiated will lead to disciplinary action which can culminate in dismissal and in severe cases could lead to criminal action. Embezzlement of Press funds or use of Press resources for purely personal gain are serious examples of fraudulent activity, but the Press is equally intolerant of fraudulent misrepresentation, lying in the course of business, or deliberately withholding relevant and material information, revenues or resources.

The Press has a [Sustainable Procurement Policy](#) which is designed to minimise negative impacts from trading activities on the environment and local communities, with particular reference to forestry products. It specifies that all raw materials should be derived from legal and sustainable sources, and sets the standards we should observe in the use of materials, especially book paper. This involves working with entities such as the Forest Stewardship Council (FSC), Programme for the Endorsement of Forest Certification (PEFC) and Convention on International Trade in Endangered Species of Wild Fauna and Flora (CITES) to adopt

practices that avoid negative environmental impacts and deliver community benefits throughout the relevant supply chain. To strengthen further the Sustainable Procurement Policy, we are signed up to the most widely recognised industry standards for labour conditions, environmental impact and chemical safety in this area.

All Cambridge University Press employees worldwide are responsible for integrating this policy into their decision making and working practices. Employees are given appropriate training on our Sustainable Procurement Procedure which is audited periodically.

We measure and control supplier performance with this policy by means of a Supplier Environmental Questionnaire which suppliers of products or services appointed by Cambridge University Press must complete. Our suppliers are to grant access with reasonable prior notice to Cambridge University Press employees or their appointed agents in order to assess their facilities and systems.

In cases where the Press does not itself directly control the sourcing of raw materials (as, for instance, in the case of co-publications for which a partner publisher buys materials and print) but the end product nevertheless bears the Press's brand, the Press will require our partner to adopt procurement practices consistent with this policy.

Ethical behaviour may be governed, as in these examples, by formal or legal codes; but it may also be more subjective or open to interpretation. Any concerns about the ethical basis of our trading, or suspicions that we might be behaving in a manner that could be deemed unethical, in one context or another, should be raised with Press management for further investigation. The Ethical Concerns section of this Code of Ethics explains how to do that. The Press Board takes seriously its responsibility to the University to ensure that we behave in all cases in a manner compatible with our status as part of a respected public-benefit institution.

Modern Slavery

Modern slavery is a term used to encompass slavery, servitude, forced or compulsory labour and bonded labour. It can include child labour and human trafficking. Victims are often coerced, deceived, or forced against their free will into providing work or services, often through having their identification or other key documents and property confiscated and fees or costs associated with recruitment charged against them. Human trafficking is where a person arranges or facilitates the travel of another person with a view to that person being exploited.

Modern Slavery is a crime and a violation of fundamental human rights. The Press is committed to implementing systems and controls to ensure that modern slavery is not taking place anywhere within our organisation or in any of our supply chains. We require

relevant third parties to hold themselves and their own relevant suppliers to the same high standards, and may undertake unannounced visits or audits to ensure that this is the case. These standards are as follows:

- Workers shall not be subject to forced, prison, bonded, indentured, slave, trafficked or compulsory labour in any form, including forced overtime.
- Workers must have the right to terminate their employment freely as appropriate, following a reasonable period of notice in accordance with local laws, and without the imposition of any improper penalties.
- Workers shall not be mentally or physically coerced to provide their labour.
- Workers shall not have their identity documents or travel permits, passports, or other official documents or any other valuable items confiscated or withheld as a condition of employment and the withholding of property shall not be used directly or indirectly to restrict workers' freedoms or to create workplace slavery.
- Fees or costs associated with the recruitment of workers (including but not limited to fees related to work visas, travel costs and document processing costs) shall not be charged to workers whether directly or indirectly. Similarly, workers shall not be required to make payments which have the intent or effect of creating workplace slavery, including security payments, or be required to repay debt through work.
- Subject to the overriding prohibition on the use of child labour, if workers under the age of 18 are employed then particular care shall be taken as to the duties that they carry out and the conditions in which they are required to work to ensure that they come to no physical, mental or other harm as a direct or indirect result of their work or working conditions. Applicable laws governing child labour shall be followed at all times.
- Workers, their families and those closely associated with them shall not be subject to harsh or inhumane treatment including but not limited to physical punishment, physical, psychological or sexual violence or coercion, verbal abuse, harassment or intimidation; migrant workers, their families and those closely associated with them should not be subject to discrimination or different treatment due to their nationalities.
- Workers shall be free to file grievances with their employers about their treatment. Workers shall not suffer detriment, retaliation, or victimisation for having raised a grievance.
- There shall be no requirement placed on workers that they take accommodation in employer-controlled premises except where this is necessary due to the location or nature of the work being performed.

Data Protection and Personal Information

Personal information is that which relates to an identifiable individual such as names, email addresses and other contact details, purchase history, test scores, financial records, on-line identifiers, biometric data or opinions. Such information may concern colleagues, customers, authors, suppliers and other individuals.

In the course of our business, knowing more about who our customers and authors are, what they want and how they interact with our products and services is increasingly important to us. We need this information to be kept secure, up to date and confidential. We must respect personal information and handle it responsibly.

It is essential that we respect and protect this information and ensure we meet the requirements of data protection and privacy regulations in the places where we do business and in accordance with our global [Data Protection Policy](#). Any personal information which we hold, or which others collect, hold or process for us, or to which we have access, must be used only for legitimate Press business purposes.

Special categories of sensitive personal information relating to an individual's race, ethnic origin, political opinions, religious or philosophical beliefs, trade union membership, genetic or biometric data, health, sex life or sexual orientation, or criminal activity need to be handled with particular care. There are additional legal requirements we must observe when handling data relating to children.

It is also right that individuals know what we will be doing with the information they provide to us, and that we respect their rights in relation to the data we hold, such as a right to access that information and to correct it if it is inaccurate.

Safeguarding

Where our off-site publishing activities involve direct interaction with children, such as visits to schools from authors and staff to promote our content, or consultation on curriculum reform, we will ensure that anyone who undertakes this work on our behalf has complied with local screening procedures and other regulations designed to safeguard children's welfare.

Part 2. Publishing Ethics

Intellectual Property and Academic Integrity

We cannot achieve the Press's purpose without upholding both the principle of academic freedom and the high [academic standards associated with the University](#).

We do this by maintaining an academically rigorous, ethical and editorially-independent publishing programme of the highest quality that relies on a comprehensive peer-review process for our book and journals lists and across all product streams considers carefully issues of authorship, attribution, citation and sourcing. This programme is undertaken in close and open partnership with our authors and publishing partners, and we expect these partnerships to uphold the research integrity standards we share with the rest of Cambridge University. It is overseen by the publishing committees of our Governing body, the Press Syndicate, and the Press and Assessment Board. [Click here for more on our governance](#).

Engaging in trade is essential to ensure sustainable widespread dissemination and high impact which is central to achieving the Press's purpose, but any commercial, legal or financial decisions about how our products and services are produced, sold and distributed will always be made in light of the University's mission and will be consistent with our high standards and the principle of academic freedom. We believe our purpose is best achieved by making our products widely available and widely used. That belief requires us to be present and/or actively trading around the world.

We are clear that worldwide research and learning communities will usually be better served by our ongoing presence than our absence. Nonetheless from time to time, individual countries may adopt legal, political or trading systems based on values that are inconsistent with our principles, including policies that repress thought and the free exchange of views. Our values and standards will never be compromised in order to achieve financial gain.

In order to ensure that the principle of academic freedom and the values of the communities we serve remain at our core, we have developed policies and processes to govern our research and educational publishing decisions where ethical questions arise. These policies will be reviewed annually and will be overseen by our governing body. Links to these documents will be available online from June 2018.

In addition to maintaining our own policies, the Press is a member of the Committee on Publication Ethics (COPE), a global organisation that provides independent advice to academic publishers on best practices for handling publication misconduct. We regularly consult COPE and its guidance documents on ethical issues that confront our Academic editorial teams.

Freedom of Expression

A full and frank exchange of views and the wide availability of academic material are both essential to robust academic enquiry and the search for truth. On occasion, these twin principles that underpin our publishing conflict with the laws of sovereign nations. When this happens, to ensure that our activities remain consistent with our values, we have in place a series of procedures and associated escalation processes designed to assess each situation on its facts but in all cases to ensure that our publishing decisions continue to align with the University's mission and our purpose.

Copyright Enforcement

We strive to have close relationships with our authors and we respect the intellectual property of third parties. We also expect the same respect for the intellectual property that we publish on behalf of our authors. We maintain an anti-piracy programme that combines both education and enforcement measures to address illegal copying in both print and digital formats worldwide.

Further details about our approach to intellectual property and publishing ethics can be found in the relevant policies and procedures and colleagues are encouraged to become familiar with these.

Part 3: Dignity at Work

As an ethical employer, we recognise the right of all colleagues to be treated with respect and dignity, and we are committed to the development of positive policies for the elimination of all kinds of harassment and bias. Harassment at work in any form by any party is unacceptable and will not be tolerated or condoned. Harassment or discrimination because of the actual or perceived race, sex, gender identity, sexual orientation, age, family responsibility, religion or belief or disability of a person or someone with whom they associate (such as a work colleague, relative or partner) is unlawful. A serious case may also be a criminal offence.

Colleagues have the right to work in an environment free from harassment, discrimination, bullying and any other type of intimidation from anyone they deal with during the course of their employment either in the workplace or in settings outside the workplace, such as business trips, events, or social functions off Press premises. Our own colleagues are expected to abide by these same standards in all professional relationships.

The [Dignity at Work Policy](#) covers every individual working for the Press irrespective of their position, role or geographical location.

Part 4: Raising Ethical Concerns

As outlined in the Press's [Concerns at Work Policy](#), and as emphasised in this Code of Ethics, we are committed to the highest standards of quality, probity, openness and accountability in all our activities. Part of our commitment involves making it possible for colleagues with serious concerns regarding any aspect of their work, the conduct of others or the management of our organisation to report such concerns with confidence and in confidence. We are also committed to ensuring that interactions with our authors, customers and other third parties are conducted in an appropriate manner and that they too, have a clear procedure for addressing their concerns.

In many of the policies outlined here, the most sensible first port-of-call is your line manager or local HR officer. We recognise that there may be occasions when this may not be appropriate, however, and you may want to express concerns of a confidential nature and seek as much anonymity as possible. It is important that you feel able to do this without fear of reprisals or victimisation. As such, the Press provides access to an external and confidential [Whistleblowing Hotline](#) for anyone (whether employed at the Press or not) to raise concerns. Additionally, you should feel free to contact any of the Press Board contacts listed below.

A non-exhaustive list of examples of areas where you may have concerns would include:

- bribery or corruption;
- slavery, human trafficking and child labour;
- harassment, bullying or discrimination;
- financial or other fraud;
- theft, sale or other misappropriation of Press proprietary or confidential information, e.g. unauthorised access to databases;
- a data security incident;
- the destruction or falsification of records;
- a breach of terms of employment or engagement;
- breaches of confidentiality;
- conflicts of interest;
- any illegal act or omission;
- publishing ethics concerns
- the concern that someone is being drawn into terrorism or radicalisation.

Please read the relevant policies in full to find out how best to raise any such concerns. Some concerns are better raised with HR, whereas other ethical matters could be raised with Legal, Compliance, or [Ethics Officers](#) as appropriate.

If you come with a concern, we will look into it carefully and thoroughly. We will be fair to you, and also to any others involved. If someone is being accused of potential misconduct, we will investigate through our internal procedures.

Contacts

The Press Board is responsible for the Press's Code of Ethics, and for ensuring that it is maintained. If you wish to raise a question or concern relating to any aspect of the Code, you are welcome to contact any of the following at any time:



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