Oxford University Press

Code of Conduct

2016/17
Contents

04
Letter from Nigel Portwood

05
Our mission and values

06
The people we work with

07
The way we operate

10
Making sure our Code is widely understood

10
Reporting your concerns

11
More resources and contacts
OUP’s Code of Conduct is a guide to help us to work in a way that is consistent with our values and to support us in making good decisions every day. The principles in our Code are informed by our mission and underpinned by OUP policies. We aim to capture what Oxford University Press means to the people who work here and to ensure there is no difference between what we say and what we do.

First published in 2012, our Code of Conduct is reviewed and re-issued annually. A regular evaluation of our environment, ourselves, and our recent actions ensures that we are keeping ahead, rather than keeping up.

It is important that you read and engage with the 2016/17 Code as we have introduced new principles for information security and data protection and third party confidentiality; critical and integral guidelines that uphold OUP’s uncompromising standards.

Our Code is available in 18 languages, and we ask you to acknowledge that you have read and understood it via a formal system.

We believe our Code of Conduct should be updated collaboratively and therefore ask that you please do let us know if you have any questions or ideas.

Nigel Portwood
Chief Executive, OUP
Our mission and values

Oxford University Press is a department of the University of Oxford. It furthers the University’s objective of excellence in research, scholarship, and education by publishing worldwide.

At Oxford University Press we have a clear mission which informs everything we do: to create world-class academic and educational resources and to make them available across the world. We do this because we are part of the University of Oxford, one of the world’s most influential and prestigious centres of learning.

Our work today is rooted in nearly 500 years of publishing history and several important values:

– We believe that access to education and research changes lives for the better, and so we create high-quality resources that inspire learning and provide new insights.

– We believe that trust underpins all of our work; from building strong relationships with our authors, customers, suppliers, and colleagues to ensuring that everything we do is honest and appropriate.

– We value the University’s excellent reputation and strong global brand, and believe that our actions must support these important assets.

– We believe that we must continue to innovate in order to maximize the value we bring to the creation and dissemination of academic and educational resources.

In addition to being guided by our mission and these values, we must also uphold the University’s charitable status through all of our work. This means that the University’s primary purpose is at the core of all we do, and we apply our resources responsibly in pursuit of that purpose.

The following set of principles guides all of our work around the world.
The people we work with

OUP employees

OUP seeks to recruit people who share and model its values and will contribute to its success.

We are committed to promoting and maintaining a culture of equality and diversity and, as a minimum, we comply with relevant legal requirements wherever we operate.

We respect the knowledge, skills, and experience that each individual brings to their work here, and we endeavour to involve our colleagues to the best of their abilities.

We try to create a working environment that people find stimulating and enjoyable, and where learning opportunities are available.

We treat our colleagues with dignity and respect, and promote a safe environment free from discrimination, harassment, and victimization.

We ensure our work environments are healthy and safe and do not put ourselves or others at risk.

We respect our colleagues’ privacy and right to a life outside work.

OUP employees can expect fair remuneration for doing their job.

Suppliers, authors, and other partners

When choosing suppliers, authors, partners, or any organization or individual with whom we do business, we expect competence, reliability, and ethical behaviour from them.

We value our relationships with suppliers and other partners and endeavour to create mutually honest, open, and reliable working practices.

We produce a Partner Code of Conduct for all of our suppliers, authors, customers, agents, government officials, and any other business partner with whom OUP has a business relationship. In general, we make this available to our partners and ask them to acknowledge they have read and understood it.

If you need help with understanding how to use the Partner Code in your work, contact your Divisional Compliance Manager or Officer.

Global policies that provide further guidance on aspects of employment in our organization:

Dignity at Work policy
Environmental policy
Equality and Diversity policy
Health and Safety Policy Statement of Intent
Mobility policy
Pre-Employment Vetting policy
Recruitment policy

If you need help with locating and understanding these policies, contact your HR Business Partner.
The way we operate

Ethical practices

We are committed to the highest standards of integrity and we comply with the laws and regulations of every country in which we do business.

We do not offer, promise, give, request, agree to receive, or accept bribes no matter what the value, or what local business practice may be. This applies to all parties with whom we deal including suppliers, authors, partners, customers, and government officials. We also expect third parties acting on behalf of OUP not to bribe.

We do not make facilitation payments, nor do we allow third parties to do so on our behalf.

We take appropriate action to prevent all forms of fraud within OUP.

We expect you to report any instances of suspected bribery or fraud, and in return OUP commits to investigating them appropriately.

We ensure that any gifts or hospitality we give or receive are always clearly for business purposes and are reasonable and appropriate.

We do not make political donations.

We do not engage in collusive practices, such as price-fixing with competitors or bid-rigging on tenders.

We do not engage in coercive practices, such as threats or blackmail.

We have a duty to avoid situations where there might be conflict between OUP’s interests and our own personal interests.

We do not manage directly or report to another member of staff with whom we have a close personal relationship.

As individuals we don’t compete with any activity or business of OUP’s, directly or indirectly, or use the knowledge gained here to help anyone else to compete with or undermine us.

We don’t hold or make personal investments that might affect our business judgement. For instance, we don’t have personal interests in companies that compete with or do business with OUP unless we have disclosed this interest to the Group or Divisional Compliance teams and they have approved it.

We treat OUP property with respect and we make sure that it is not used for personal purposes except in special, authorized circumstances.
Customers

We value the confidence and trust of our customers, and will always endeavour to communicate honestly, openly, and reliably with them.

When customers contact us we respond professionally, politely, and within appropriate timescales.

We welcome customer feedback and try wherever possible to act on it to improve our services.

We always try to ensure that our product information, advertising, and other forms of communication are clear, accurate, and honest.

Intellectual property

We protect OUP’s intellectual property (trademarks, design rights, copyrights, proprietary information, trade secrets) at all times.

We follow OUP’s global Corporate Visual Identity Manual for guidance on use of our logo and other brand marks.

We respect intellectual property rights throughout the world, including the intellectual property rights of our suppliers, authors, partners, and any organization or individual with whom we do business.

Confidentiality

OUP Confidentiality

We treat OUP plans and information as confidential, and don’t disclose them to people outside our organization unless it is necessary, we are authorized to do so, and we have taken the appropriate steps to secure the data.

We never disclose information for our own or others’ private benefit.

We take care to protect the integrity and security of our information when we are travelling, or working in public places.

We take care with our computers, laptops, other mobile devices, and passwords to ensure that sensitive information cannot be mislaid or stolen.

When we receive a media or external enquiry about OUP which is not directly related to our products or is unusual in any way, we refer it to the appropriate PR or communications department (Group or Local). We don’t attempt to respond ourselves unless asked to do so by a member of our Divisional Board or Group Communications.

Third party confidentiality

We respect confidentiality obligations to third parties, including former employers, competitors, customers, and suppliers.

We encourage our colleagues to respect their current and previous third party confidentiality obligations. We never encourage colleagues to break these obligations by sharing unauthorized third party confidential information without that third party’s approval.

We do not retain unauthorized confidential information or share it with others, and we never use unauthorized confidential third party information for our own or OUP’s benefit.
The way we operate

Our records and data

We maintain records that fairly and accurately reflect our business transactions as they occur.

We don’t make false or misleading entries. We follow all our control and financial policies.

We don’t knowingly provide false information to OUP or about OUP externally.

We are each responsible for protecting information when handling other people’s personal data, whether it relates to an employee or a customer.

We will classify records and data into different categories depending upon the nature of the information, in accordance with our information security and data privacy policies and standards.

We take care when responding to third party requests to access confidential information.

We take care when working with third party providers who may be handling our confidential information on our behalf.

We comply with local data protection laws.

Charitable giving

As a department of the University of Oxford, OUP is part of a charity. This means that OUP’s charitable giving is restricted to organizations that share a similar educational mission to that of the University.

We support a number of organizations on a longer term basis including several that donate books to educational outlets in developing countries and widen access to education and research. We also make one-off donations of publications and small financial gifts to many small charities every year.

We don’t make any donations without first consulting OUP’s Global Charitable Giving Policy or Group Communications.

Our social responsibilities

We support universal human rights including equal employment rights, safe workplaces, freedom of speech and of association, and the rights of all to an education.

We oppose illegal or inhumane labour practices and expect our suppliers and other partners to do the same. We will take steps to ensure that there is no slavery or human trafficking in our business or its supply chain.

We are mindful of our impact on the environment and endeavour to minimize the impact of our operations on our surroundings. We have a Global Environmental policy that provides more information about our practices.
Making sure our Code is widely understood

Everyone working for OUP receives a copy of the Code, either electronically or on paper. It is also available on OUP’s intranets (Oxford Share and any local intranet sites) and our corporate website.

All managers are responsible for ensuring that their team members receive a copy of the Code, and that they understand all of the principles.

If there is anything in the Code of Conduct that you don’t understand, or if you want some guidance, you can ask for help from the following people:

Your manager
Your HR Business Partner
Your Divisional Compliance Manager
Group Compliance (see contact information on page 11)
Group Legal (see contact information on page 11)
Group Communications (see contact information on page 11)

All employees will receive an annual reminder about OUP’s Code of Conduct, whether or not there are any changes to the content of the document. It is required that every individual will read the document on receipt, ask questions as appropriate, send an acknowledgement that they have understood it, retain an easily accessible copy for reference on a day-to-day basis, and comply with the Code both in letter and in spirit.

Reporting your concerns

If you think someone is acting in a way that is inconsistent with OUP’s Code of Conduct, then it is important that you take action. You can report it to your manager, but if you feel uncomfortable doing so, you have several choices:

For ethical concerns, please contact your local Divisional Compliance Officer.
For employment matters, please contact a member of your local HR team.
You can contact Group Legal or Group Compliance (details on page 11).
Or contact the Compliance and Ethical Concerns Helpline, a confidential telephone and email service. Details about the service can be found in OUP’s Raising Ethical Concerns Policy. The phone numbers and other relevant contact details can be found on Oxford Share.
Many OUP policies are referred to within the Code of Conduct. Most are Group-wide policies and we include a list of these below. All OUP global policies are available on Oxford Share. There are also other policies of local relevance. If you have trouble locating the policies please ask your manager or HR Business Partner for help.

### Group-wide policies

Please be aware that where a specific clause in this Code of Conduct is not consistent with local laws, the local laws will prevail.

- Acceptable Use Policy
- Bribery and Fraud
- Charitable Giving
- Collusive and Coercive Practices
- Conflict of Interests
- Corporate Visual Identity Guidelines
- Data Privacy Policy
- Dignity at Work policy
- Environmental Policy
- Equality and Diversity policy
- Ethical Marketing
- Gifts and Hospitality
- Group Legal Policy
- Health and Safety Policy of Intent
- High-Risk Business Activity
- Information Security Policy
- Media Policy
- Mobility policy
- Pre-Employment Vetting policy
- Raising Ethical Concerns
- Recruitment policy
- Social Media Policy

### Available translations

The Code of Conduct is available in the following languages, copies of which can be downloaded from Oxford Share or are available from your HR Business Partner or Group Communications:

- Arabic
- Bahasa Malaysian
- Brazilian Portuguese
- Simplified Chinese (China)
- English (British)
- German
- Hindi
- Japanese
- Korean
- Polish
- Spanish (European)
- Spanish (Latin American)
- Swahili
- Traditional Chinese (Taiwan, Hong Kong)
- Thai
- Turkish
- Urdu
- Vietnamese

### Contacts

**Group Compliance**
Email address: andrew.wigmore@oup.com
Phone number: +44 (0)1865 353609

**Group Legal**
Email address: jo.marks@oup.com
Phone number: +44 (0)1865 353936

**Group Communications**
Email address: rachel.goode@oup.com
Phone number: +44 (0)1865 353388

**Group Human Resources**
Email address: humanresources.uk@oup.com
Phone number: +44 (0) 1865 354415