

Code of Ethical Business Conduct

I. INTRODUCTION

It is the goal of MiddletonMurray to adhere to the highest ethical standards in all that it does. MiddletonMurray expects that those who are part of our community, including staff and learners will adhere to such standards in their dealings with each other and with those beyond our community. Ethical business conduct calls for all MiddletonMurray Personnel to assume responsibility for safeguarding and preserving MiddletonMurray's assets and resources in the fulfillment of our mission.

MiddletonMurray will comply fully with all relevant laws and all contractual requirements, as well as with its own high standards of integrity and quality. MiddletonMurray Personnel are expected to assume personal responsibility and accountability for understanding relevant laws, regulations, and contractual requirements. In addition to complying with specific laws or regulations that govern business activities, standards of fairness, honesty, and respect for the rights of others will govern MiddletonMurray's conduct at all times.

II. ETHICAL PRINCIPLES

A. COMPLIANCE WITH LAWS

MiddletonMurray will transact its business in compliance with the laws of the jurisdictions in which it does business. MiddletonMurray's Personnel will familiarize themselves with any legal obligations arising out of the work done for MiddletonMurray, including but not limited to the obligations to comply with applicable recordkeeping requirements and not to retaliate against anyone who reports a suspected violation of the law. If questions arise regarding compliance with the law, or if it appears that a policy conflicts with the relevant law, the personnel who become aware of that situation should contact the department that has oversight responsibility for the policy.

B. CONTRACTUAL AND GRANT OBLIGATIONS

In addition to its commitment to comply with applicable laws, MiddletonMurray recognizes its contractual obligations to the government, suppliers, employees and others with whom it contracts. Regardless of the source of funds, MiddletonMurray will adhere to its contractual obligations.

C. INTEGRITY AND QUALITY

MiddletonMurray Personnel should recognize that MiddletonMurray has earned and must maintain a reputation for integrity and quality that goes beyond compliance with laws, regulations and contractual obligations. MiddletonMurray strives for excellence in administration, recruitment and training. Even the appearance of misconduct or impropriety can cause severe damage to the organisation's reputation. As such, MiddletonMurray's Personnel must strive at all times to maintain the highest standards of quality and integrity.

D. CONFLICT OF INTEREST

MiddletonMurray's Personnel should avoid situations that create or appear to create conflicts between their personal interests and the interests of the organisation. All decisions made by MiddletonMurray in the course of their professional responsibilities to the organisation are to be made solely on the basis of their desire to promote the best interests of the organisation. If an individual's personal interests might lead an independent observer reasonably to question whether the individual's actions or decisions on behalf of the organisation are influenced by those personal interests, the individual should recuse himself or herself from the decision making process and notify the responsible staff.



In addition, it is our policy to comply in all respects with laws concerning conflicts of interest and other related trading laws.

E. CONFIDENTIAL INFORMATION

MiddletonMurray staff may have access to confidential, proprietary and private information. Those who have access to this information may not make any unauthorized use or disclosures of the information, either during or after employment.

F. ANTITRUST CONSIDERATIONS

Like other economic enterprises, training providers are subject to antitrust laws, which are aimed at protecting competition. For this reason, MiddletonMurray staff should avoid agreements or exchanges of information with other providers that adversely affect economic competition within the sector. MiddletonMurray staff should never enter into agreements with other providers regarding future tuition, fees, financial aid, or salary levels. In addition, it is ordinarily inadvisable for MiddletonMurray staff to disclose or exchange future plans or projections concerning these subjects with other providers. MiddletonMurray personnel should not participate in surveys concerning these matters unless the survey seeks public information or information that is historical in nature.

G. FINANCIAL REPORTING

All MiddletonMurray accounts, financial reports, tax returns, expense reimbursements, time sheets and other documents, including those submitted to government agencies must be accurate, clear and complete. All entries in our books and records, including departmental accounts and individual expense reports, must accurately reflect each transaction.

H. AUTHORITY TO CONTRACT

All our transactions must be authorized by

appropriate individuals and conducted in accordance with applicable procedures. Individuals who enter into contracts on behalf of MiddletonMurray should confirm the extent of their authority to do so on a regular, in most cases, annual, basis.

I. CONSEQUENCES OF VIOLATIONS OF MIDDLETONMURRAY POLICIES

Each person is responsible for ensuring that his or her own conduct and the conduct of anyone reporting to him or her fully complies with this Code and with MiddletonMurray's policies. Violations may result in the taking of appropriate disciplinary action up to and including discharge from employment. Disciplinary action will be taken in accordance with the procedures applicable to faculty or staff, as the case may be. Conduct representing a violation of this Code may, in some circumstances, also subject an individual to civil or criminal charges and penalties.

Created by Clement Akran

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Code of Ethical Business Conduct Health and Safety Policy

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