

## External Code of Conduct

This Code of Conduct details the principles and policies which govern Babington.

Babington Business College Ltd is a leading provider of business courses, apprenticeships and traineeships in the UK. Our services intrinsically support social mobility through formal learning and education.

Honesty and integrity form part of our core company values and we uphold these by operating ethically and responsibly at all times. Further, we support the Ten Principles of the UN Global Compact and take action to positively contribute to the UN Sustainable Development Goals. We deliver our commitment by:

- **Anti-Slavery and Human Trafficking Statement:** We are committed to ensuring that there is no modern slavery or human trafficking in our supply chains or in any part of our services.  
See link to our Anti-Slavery & Human Trafficking Statement which sets out the preventative steps that Babington is taking (and intends to take) to avoid the risk of modern slavery occurring within our services.
- **Business ethics:** We conduct all business with honesty, integrity and comply with all relevant legislation. Anti-competitive practices including market-sharing, price-fixing, non-respect of confidentiality agreements, industrial espionage and abuse of dominant position are prohibited.
- **Community:** We strive to positively contribute to our local community, engaging and supporting local charities and provide two days' paid leave per year to our employees to engage in community-based volunteering.
- **Complaints:** Babington's Complaints Policy provides the framework within which anyone who is dissatisfied with the organisation can raise their concerns. The framework also assists staff to effectively deal with complaints from learners, parents, customers, employers, contractors, visitors and other interested parties.  
See link to our Complaints policy.
- **Corruption:** We prohibit corruption in all its forms, including bribery, extortion, fraud, embezzlement, money laundering and facilitation payments. Gifts and hospitality are not accepted if they are in any way thought or perceived to be in return for either doing/not doing something or showing favour/disfavour to a person or organisation.
- **Information Security and Data Privacy:** We are committed to protecting the confidentiality, integrity and availability of the organisation's information assets. We recognise the importance of protecting personal information and are committed to processing it responsibly and in compliance with applicable data protection laws, including UK GDPR obligations. External disclosure of confidential information is prohibited. The company Information Security Management System (ISMS) is externally verified to ISO27001:2013.  
See link to our Information Security Policy.

- **Equality, Diversity & Inclusion:** We respect and champion individual differences, providing equal opportunities in relation to all aspects of employment and work conditions. Direct discrimination, indirect discrimination, harassment, and victimisation in relation to age; colour; COVID-19; disability (mental or physical); ethnicity; gender reassignment; marriage or civil partnership status; nationality; political opinion; pregnancy and maternity; race; religion or belief; sex; sexual orientation; and worker representative organisations are all prohibited. See link to our Equality, Diversity & Inclusion Policy.
- **Environment:** We minimise our environmental impacts, notably those associated with waste and energy use, by avoiding waste, encouraging recycling; and minimising travel-related carbon emissions.
- **Health and Safety:** We are committed to effectively managing all aspects of Health and Safety in our workplace, and positively contributing to employee wellbeing. See link to our Health & Safety Policy.
- **Human Rights:** We respect Human Rights and operate in accordance with the fundamental rights set out in the International Labour Organisation's Declaration on Fundamental Principles and Rights at Work. This includes upholding freedom of association and collective bargaining, not using forced or child labour, and eliminating discrimination.
- **Safeguarding:** We promote the Welfare and Safeguarding of every learner and are wholly committed to practise in a way that protects every learner. We believe that learners should never experience any form of abuse, discrimination, harassment, or victimisation. See link to our Safeguarding & Prevent Handbook
- **Labour standards:** We pay fair remuneration, including company bonuses linked to performance. After completion of their probation period, all employees receive pension contributions. Employees are not expected to work more than 48 hours a week and receive far in excess of the ILO recommended paid holiday.
- **Lobbying:** We do not give political donations and we prohibit lobbying in contradiction of the standards upheld in this policy.
- **Supply chain:** We are committed to paying our suppliers on time and promptly. Our standard supplier payment terms are 60 days. In addition, we publish a Supply Chain and Management Fee Policy that details how Babington applies funding to all supply chain activity supported with funds supplied by the Education and Skills Funding Agency (ESFA) and the European Social Fund (ESF).
- **Tax:** We comply with the letter and spirit of all tax laws applicable to the company. We are committed to paying our taxes, not engaging in tax avoidance and being transparent in our relationship with the HMRC. As a company headquartered and solely operating in the UK we pay all relevant UK taxes.

- **Whistleblowing:** Babington requires all colleagues to maintain high standards of conduct. However, all organisations face the risk of things going wrong from time to time, or of unknowingly harbouring illegal or unethical conduct. A culture of openness and accountability is essential in order to prevent such situations occurring and address them effectively if they do occur. We encourage colleagues to report suspected wrongdoing as soon as possible, in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected.

This Code of Conduct applies to all employees and contracting staff at Babington. We communicate this Code of Conduct to all employees, send to new employees and integrate into the company website. The Code is reviewed and updated annually. Employees and other stakeholders are invited and encouraged to raise any suspected non-compliance with this Code, or other whistleblowing concerns, with their line manager.

Signed:



Mark Basham  
**Chief Executive Officer**

September 2023