Code of Ethics 2024





Message from Peter Phillips, Chief Executive

Cambridge University Press & Assessment is one of the world's great organisations supporting education and research. The examples we set, and the values we live, have a profound impact on the world and how Cambridge more broadly is perceived.

As a part of the University of Cambridge, our mission is to contribute to society through the pursuit of education, learning, and research at the highest international levels of excellence.

When we publish content, deliver assessments, support learners, teachers and researchers, or conduct research, we - and those we serve - rightly expect the highest ethical standards.

Our reputation, and that of the whole University of Cambridge, hinges on it. More than that, students, teachers and researchers in over 170 countries depend on us to get this right.

If we do not live up to this standard, we must act. All organisations are imperfect. Great ones choose to be open to challenge as they seek to improve.

If you see something that you suspect is not right, never be afraid to ask. If you believe our Code is being violated, it is critical that you speak up. If you come to us with a concern, we will support you.

Thank you for all you do to help us live up to our values.

Contents

Our purpose and values

Our core principles

Your reference guide

Ethical decision-making framework

Speaking up and seeking guidance

Our fundamental commitments: publishing and educational integrity

Excellence, integrity, and inclusion at work

Respectfully interacting with learners, customers, and business partners

Conducting our activities ethically and sustainably

17
Protecting Our
Information and Assets

18
Being an excellent corporate citizen

Our purpose and values



Empowerment

Take accountability for our decisions in order to create an environment that our people and customers can succeed in.

- We own the work that we do.
- We make informed and timely decisions.
- · We enable ourselves and others to succeed and thrive.



Collaboration

Work together effectively as part of an inclusive and diverse global network to create better outcomes.

- We act as a community.
- We advocate for, and foster, an inclusive culture.
- We ensure effective communication across our teams and with our customers.



Responsibility

Act with efficiency and care to ensure that we, and our profits, contribute to society and our planet.

- We use our resources to maximum effect.
- We respect our planet.
- We act with integrity.



Innovation

Learn continuously to improve and make things better for our customers.

- We put the customer's needs at the heart of what we do.
- We embrace change.
- We foster an environment of learning and growth.

Our core principles

Honest and ethical practices

While succeeding as an organisation is critical, success should never be achieved at the expense of high ethical standards. Our policy is to comply with all applicable laws and regulations of the countries and regions in which we operate and to always operate in an honest, ethical, and responsible manner. We value fairness, integrity, and respect for others. We all have a responsibility to understand and follow legal and internal policy requirements that apply to our jobs and to follow the principles outlined here in spirit as well as letter.

A commitment to sustainability

We believe that the health of an organisation depends on the health of the environment and the wellbeing of global citizens. As a socially responsible organisation, we measure our success based on the impact and reach of our activities and the scale of our contribution to helping learners realise their aspirations. We recognise the climate crisis and take bold action to respond ensuring our responses also protect and advance all people.

Dignity and respect

We believe all people should be treated with dignity and respect. This ideal extends to our employees, our business partners, our learners, our authors and the citizens of the communities where we operate. We support and promote the right of all people to be free from harassment, bullying and discrimination and insist on the fair treatment of all individuals within our organisation.

Ethical use of artificial intelligence

We believe in the need to adopt new technologies, such as Artificial Intelligence (AI), in a trustworthy way. To maintain the trust of our learners, teachers and researchers, we have developed our Ethical AI Framework. Based on the European Commission's Ethics Guidelines on Trustworthy AI, our framework aims to uphold our principles of Ethical AI and ensures we hold ourselves to a high standard of protection against social risks posed by AI.

Your reference guide

This Code is our cornerstone, the foundational document that all our organisational policies and principles have been built around. It is a reference guide, designed to support your day-to-day decision making. This Code cannot possibly cover all circumstances. Instead, it details how Cambridge's values apply to various organisational activities, directs you towards relevant policies, and outlines a framework for making sound decisions.

If you find yourself in a tricky situation, please ask for help. Our business ethics and compliance team is always here to explain our policies and help you navigate challenging issues.

Does this code apply to you?

The short answer is yes! Our Code of Ethics applies to:

- All Cambridge colleagues, no matter their title, job responsibilities, or location.
- All third-party business partners including assessment specialists, consultants, joint venture partners, freelancers, agents, distributors, and suppliers.

While they aren't bound by our Code, we also hold our authors, learned societies, and editorial contributors to the same high ethical standards that they can expect from us.

Colleagues who violate our Code may be subject to disciplinary action, up to and including dismissal. Additionally, we can, and will, terminate a relationship with any third-party business partner or editorial contributor if we have concerns about their ethical conduct, whether towards our colleagues, the public, or our content.

Employee responsibilities

All of our employees have the opportunity to contribute positively to our culture. We are all responsible for making sure our actions are ethical, inclusive, responsible, and sustainable. In all that you do you must:

- Be aware of the potential risks that are relevant to your job responsibilities and location.
- Be knowledgeable about the Code and the policies that are relevant to your role and make sure that you understand those policies and know how to apply them.
- Be willing to promptly ask for help if you don't understand an issue or if you suspect misconduct.
- Be proactive about living our values and following our Code.
- Be inclusive by caring, sharing ideas, influencing change and building a sense of belonging.

Leaders' responsibilities

Our leaders, including our senior management team and executives, as well as anyone who manages people, must lead by example.

Leaders are responsible for creating a culture of belonging, integrity and openness where employees understand their responsibilities and feel comfortable speaking up without fear of retaliation in line with our leadership model. If you are a manager, you must:

- Be aware of the example you set and always model our values.
- Be knowledgeable about the messages you send and reinforce that no objective is ever worth compromising our integrity.
- Be willing to listen and make sure that your colleagues know they can always come to you, even if they are bringing bad news.
- Be proactive about communicating the importance of ethics and compliance and to holding the people who report to you accountable.
- Be inclusive by caring, sharing ideas, influencing change and building a sense of belonging.



What to do when you don't know what to do – our ethical decision-making framework



As we mentioned above, this Code cannot give guidance on every circumstance you may encounter at work. If you find yourself in a situation where you don't know what the right decision is, **PAUSE**.



Ask yourself the following questions designed to help you determine if the decision is ethical.

Is this potential decision legal and consistent with our policies and Code?

Is this potential decision consistent with our values of collaboration, responsibility, innovation, and empowerment?

Are you personally comfortable with this decision? Would you be comfortable with your friends and family knowing that you made this decision? Do you believe it is ethical?



If you answer any of these questions with a 'no,' or even a 'maybe' or 'I don't know,' **STOP.** Do not move forward until you ask for additional help and guidance from your manager, the business ethics and compliance team, or the Speak Up Portal.

Speaking up and seeking guidance

We believe our organisational goals should never be achieved at the expense of high ethical standards. To ensure that Cambridge stays on the right path, we strive to make it as easy as possible to speak up when something seems amiss. We encourage our colleagues and everyone we work with to raise concerns, and we prohibit retaliation against anyone who reports a concern in good faith.

How to ask a question or raise a concern

When reporting an issue, you should be as specific and detailed as possible so the person taking the report understands your concern. In many situations, your manager will be in the best position to resolve your question or concern. However, if you don't have a direct manager or don't want to discuss an issue with your manager, you can contact any of the people and groups listed below:

- Our confidential Speak Up Portal
- Business Ethics and Compliance Team
- People and Culture Team
- · Any member of the Executive Board
- Global Staff Consultative Committee

No tolerance for retaliation

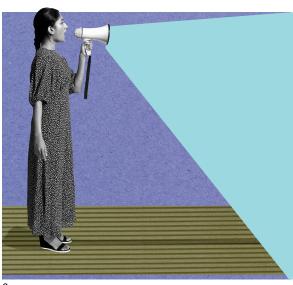
It takes courage to speak up when you notice an issue. Any retaliation – whether direct or indirect – against an employee who raises a good faith concern is grounds for disciplinary action, up to and including dismissal.

How leaders should handle concerns

If you are a leader and are approached with a concern, you have a special responsibility to listen and act. Handling the situation appropriately is an important part of resolving issues fairly, inclusively and building trust.

If someone brings a concern to you:

- Listen carefully: Remember that the person who has approached you has done something difficult and very important. Thank them for upholding Cambridge's values and for helping to create a better organisation.
- Respond respectfully: Take every concern seriously, value cultural differences and challenge your personal bias, even if you disagree or have questions about the reporter's motives. Make sure the reporter knows you are committed to addressing the issue.
- Protect confidentiality: Avoid discussing the conversation with others and only share details on a need-to-know basis.



Speaking up, seeking guidance – reporting contacts

If you need to make a report, there are several ways to do so and your confidentiality will always be respected. Please choose whichever reporting option you are most comfortable using.

- · Our confidential Speak Up Portal available 24/7, 365 days a year
- Contact our Global Business Ethics and Compliance Officer at clare.godwin@cambridge.org or at +44 I223 325688
- · Contact a member of our People and Culture Team.
- · Contact a member of the Executive Board.

Reports may be made anonymously, however disclosing your identity allows our organisation to conduct a more expeditious and thorough investigation.

Our fundamental commitment: educational integrity

Educational integrity is at the heart of our business. Our assessments are only of value if these inform the learning process and reflect the true status of an individual's knowledge and understanding. We follow the Cambridge Approach to Assessments to ensure that our assessments are fair, have sound ethical underpinnings, and operate according to the highest technical standards.

To ensure we are upholding the standards associated with our University, we subject all of our academic publications to a rigorous, ethical, and editorially independent publishing programme, including a comprehensive peer-review process. Similarly, our teaching and learning materials are subjected to a stringent validation and approval process. Additionally, we strive to prevent our editorial independence from being compromised by any form of personal, business, financial, or political influence.

We are also fully committed to the principle and promotion of freedom of speech and expression. We believe it is important our products are widely available and used and we stand against censorship or restrictions imposed on our publications. We work to disseminate knowledge to the widest possible audience and to serve communities in countries around the world. To this end, we support fair access to our publications through offering free- and low-cost access for researchers in many developing-, low- and middle-income countries and by providing fee waivers in certain situations.

Raising concerns

Any concerns regarding our publishing and educational integrity can be raised through the following channels:

OCR:

https://www.ocr.org.uk/contact-us/complaints-policy/

English:

https://www.cambridgeenglish.org/help/complaints/

International Education

https://www.cambridgeinternational.org/aboutus/our-standards/how-cambridge-managesfeedback-and-complaints/

IELTS

https://www.ielts.org/info-pages/contact-us

Publishing ethics

Contact your relevant editor or email publishingethics@cambridge.org

Educational integrity

We respect and uphold the intellectual property rights of our authors, contributors, content providers, publishing partners, and other third parties. We expect and encourage those we work with to have the same level of respect for intellectual property rights as we do.

To help protect intellectual property rights we:

- Invest in an ongoing, worldwide anti-piracy and brand protection programme to address illegal copying and unauthorised use of our publications;
- Work with industry groups, online platforms and local law enforcement to drive more effective anti-piracy campaigns and initiatives:
- Tailor our approach to defeating piracy to address specific threats and to achieve the best outcomes for both our authors and customers.

- Ensure our partners, distributors and centres are using Cambridge content and branding within the scope of their agreements with us.
- · Direct authors who have identified infringing copies of their work to use the reporting tools available on Author Hub.
- Promptly report any actual or suspected infringement or piracy of Cambridge products or branding to the Brand Protection Team at brandprotection@cambridge.org.

Excellence, integrity and inclusion at work

Promoting equality, diversity, inclusion and belonging

We are committed to equality, embedding diversity, removing barriers to inclusion, and promoting equity in every aspect of our employee and customer experience. We seek to support all colleagues, contractors, scholars, readers, and learners irrespective of their personal identity and strive to produce products and services that demonstrate and support diversity and inclusion. We seek to work with suppliers and partners who share our commitment to advancing social equity.

Our organisational responsibilities

- We are committed to upholding international legislation and standards, ensuring that our actions balance cultural sensitivities and legal requirements and obligations,
- We do not tolerate discrimination in any of its forms, including ableism, ageism, homophobia, racism, sexism, xenophobia, and discrimination based on gender, religion, political views, trade union membership, neurodiversity, or other personal identities and beliefs
- We commit to listening to, and collaborating with our colleagues of all backgrounds and identities, valuing and respecting the contribution made by colleagues and contacts from all groups
- We will make best efforts to give free access to our publishing on equality, diversity, and inclusion at times when doing so will have a large, positive impact
- We aim to amplify marginalised voices, represent, value, and encourage diversity through our products and services to foster change and progress, broaden horizons, and improve understanding, in accordance with legal requirements
- We are committed to equal opportunities in all aspects of employment and continuously endeavour to improve representation at all levels
- Our inclusive curricula and qualifications will represent our learners and enable them to demonstrate and achieve their potential, whilst ensuring compliance with legal mandates

How you can help

- Take a proactive stance against bias in your work environment and relationships, by identifying and removing barriers so that everyone feels they belong
- Recognise where implicit or explicit biases may be impacting your professional activities and actively work to counter all forms of discrimination, promote equality and be inclusive in your professional endeavours
- Provide us with feedback about if Cambridge is hitting the mark when it comes to equality, diversity, inclusion and belonging
- Recognise and acknowledge cultural differences and learn about the cultures you are interacting with and openly share your own experiences to promote dialogue
- Learn from other teams, customers, competitors and sectors. Be inviting, listen and act on feedback
- Actively contribute to constructive dialogue and positive change within our organisation.

A commitment to equality, diversity, inclusion and belonging

As an organisation, we have made a strong commitment to equality, diversity, inclusion and belonging ('EDIB'). This commitment is reflected in diverse ways in the work we do for teachers, learners, and researchers around the world, as well as in the experience of our people. But we recognise that we need to go further and do more if we want to deliver truly diverse, and accessible products and services, while ensuring Cambridge is a globally diverse and inclusive place of belonging.

Our global EDIB strategy continues to steer our initiatives aligned to our products and people and over the last year we are proud to have implemented:

- EDIB Guidance for our products and services to help encourage conversations and offer a framework in which the consideration of EDIB issues can form part of the everyday work for the development of products and services.
- · An EDIB Data Programme where our HR system was updated to allow all employees to share their demographic data.
- Global EDIB Policy and Guidelines to support trans and non-binary colleagues in the workplace. One of the goals was to produce clear guidance that can be adopted by all our colleagues, while recognising the importance of local legislation, cultural context, and the need for flexibility.
- Gender Pay Gap Reporting that for the first time, reported data for three additional countries where we have a significant number of
 colleagues: India, the Philippines, and the United States.
- Inclusive Procurement by joining MSDUK, the UK's only advocacy organisation certifying ethnic minority businesses (EMBs).
- Internship programmes which welcomed I4 interns from a number of programmes including IO,000 Black Interns; the ChangelOO
 internship scheme; via social enterprise, Creative Access, and the Crankstart Scholarship programme.

Ensuring respect and dignity at work

We recognise the importance of treating all individuals with respect and dignity and advocate the elimination of all kinds of harassment.

Our organisational responsibilities

- We do not tolerate any form of harassment, discrimination, bullying, or any other type of intimidation by colleagues or third parties they work with
- We recognise that many forms of harassment may constitute unlawful discrimination and will support any investigations into such matters
- We provide resources and reporting options for anyone who experiences retaliation and protect anyone who makes a report from further discrimination or retaliation

How you can help

- · Always treat others with respect and dignity.
- Do not unfairly consider an individual's race, gender, sexual orientation, disabilities, or other identities when making business decisions
- Remember that our rules apply even outside the workplace – act appropriately during office functions, business trips, and other events
- If you witness, learn of, or experience bullying, discrimination, or harassment, let us know
- If someone approaches you to make an allegation of harassment, discrimination, bullying, or any other type of intimidation take them seriously, help them decide what they should do next, and ensure that you maintain their confidentiality. If you are unsure of how to help, contact any individuals or groups outlined in the Speak Up section above

Ensuring health and safety at work

We are committed to the promotion of health and safety for all colleagues and others who may be affected by our work.

Our organisational responsibilities

- We adhere to the highest levels of health and safety standards and maintain safe and healthy working conditions
- We provide clear instructions, information and adequate training to ensure employees are competent to do their work
- We provide resources to help our employees maintain their physical and mental health, including personal protective equipment where required
- We make regular safety inspections and respond promptly to new or developing health and safety concerns

How you can help

- Take reasonable care of your own safety at work and consider the safety of those around you
- Read, and observe health and safety policies and procedures
- Co-operate with efforts to establish a safe and healthy working environment, and complete required health and safety training when asked to
- Promptly report any safety or health issues and raise any questions with our Health and Safety teams
- If you are a manager, escalate all health and safety issues, participate in risk assessment and incident investigation activities and ensure appropriate corrective and preventative actions are implemented

Ensuring health and safety at work

As part of our organisational strategy, we are building a culture that values individual health, safety, and wellbeing, where all colleagues feel engaged and empowered to create a safe, positive, and supportive working environment.

Following the introduction of the new Global Health, Safety and Wellbeing Policy, we have introduced the Healthy You Programme, which aims to provide an array of engaging and enriching events, tailored to support the holistic health journey of all colleagues at Cambridge. Events taking place include live meditation, financial support and auidance

Programme, which aims to provide an array of engaging and enriching events, tailored to support the holistic health journey of all colleagues at Cambridge. Events taking place include live meditation, financial support and guidance sessions as well as talks and roundtables regarding mental health. We have also introduced a new course which outlines the Global Mental Health Crisis Pathway that should be followed when supporting an individual experiencing a mental health crisis.

We also continue our journey to implement ISO 4500I, the internationally recognised standard for Occupational Health and Safety. ISO 4500I provides a structured framework for proactively identifying and mitigating risks, reducing workplace accidents, and fostering a culture of continual improvement. As we adopt this standard, we are not only striving for compliance; we are embracing a philosophy that places safety and wellbeing at the forefront of our operations, values, and culture.

Respectfully interacting with learners, customers, and business partners

Safeguarding and protecting learners

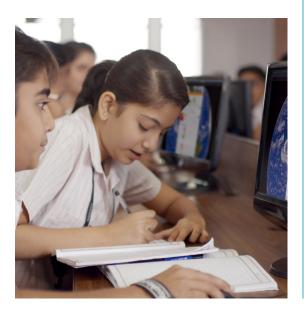
We strive to protect children, young people and other vulnerable adults in our interactions with them, speak up where we have concerns, and promote safeguarding through the products and services we offer.

Our organisational responsibilities

- We are committed to implementingput controls so that children, young people, and vulnerable adults stay safe when interacting with us
- We maintain processes to report and escalate safeguarding and child protection concerns
- We continuously endeavour to create inclusive and age-appropriate products, services, and content which are safe for all learners
- We ensure work experience, internship and apprenticeship placements are well managed, supportive and safe

How you can help

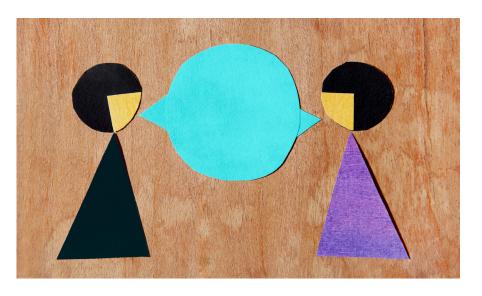
- Identify and take opportunities to promote the importance and value of safeguarding and know when you have a legal duty to report alleged or suspected abuse
- Promptly report concerns about the safety or wellbeing of a child, young person, or vulnerable adult to your manager and to outside protection agencies when appropriate
- If, after reporting your concern, you do not think appropriate action has been taken, escalate the issue to the Business Ethics and Compliance Team or by using our Speak Up Portal



Safeguarding and protecting learners

Our commitment to safeguarding and protecting children, young people, and vulnerable adults continued this year with release of an updated Global Safeguarding Policy. Key stakeholders are involved in a number of projects designed to align our safeguarding processes and procedures to help us ensure we have centralised oversight of any safeguarding concerns raised, as well as joined up reporting capabilities across the product groups. A safeguarding training course has also been developed and made available to colleagues to help them understand how they can support our commitment to protecting children, young people, and vulnerable adults.

In November 2023, the Cambridge Wellbeing Check, was awarded a Highly Commended prize by the Teach Secondary Awards. Founded on research conducted by the University of Cambridge's Faculty of Education, the Cambridge Wellbeing Check (a simple, student-led assessment for 7-18-year-olds) measures students across four areas of wellbeing: interpersonal wellbeing, life satisfaction, competence wellbeing and negative emotions. Teachers are provided with reports that show students' wellbeing over time and supporting lesson plans that provide tailored quidance on delivering wellbeing or pastoral care lessons.



Communicating with the public

We speak truthfully and accurately about our products and services and ensure that all our communications are based on facts and evidence. We do not make misleading statements or statements that are open to misinterpretation. We 'do what we say', so our operational approaches are transparent and consistent with the messages in our publishing and education.

Our organisational responsibilities

- We communicate honestly and openly with all who have an interest in our organisation, including colleagues, suppliers, and customers
- We appoint authorised persons to speak with the media on behalf of Cambridge
- We are committed to following all applicable laws regulating advertising and marketing activities

How you can help

- Never speak on behalf of Cambridge unless you are specifically authorised to do so
- Do not use personal social media accounts to make statements on behalf of the organisation
- Remember that harassment, bullying, discrimination, or retaliation not permissible at work is also not permissible online

Fair competition and antitrust

We never engage in anti-competitive practices or seek to limit competition through illegal or unfair means.

Our organisational responsibilities

- We comply with all applicable anti-trust and competition laws and regulations
- We do not exert inappropriate pressure on suppliers or customers
- We always make commercial decisions independently

- Never share confidential business information with other publishers, assessment providers, or anyone else who could be considered a competitor of Cambridge unless it has been agreed in advance by Legal and Business Affairs and has been documented in a suitable contract
- Do not coordinate, directly or indirectly, with competitors to determine the price of products or the markets where products will be distributed
- Do not attempt to control the resale prices customers may charge for our products
- Do not work with other bidders to attempt to influence the outcome of a public or private tender

Conducting our activities ethically

Preventing bribery, corruption, and fraud

As an organisation, we act ethically, exercise financial sustainability, and maintain compliance with all global laws and regulations – this is true even when doing the right thing might be more time consuming, expensive, or could cost us business. We prohibit corrupt practices in any form, including bribery, kickbacks, extortion, fraud, and other unlawful payments.

Our organisational responsibilities

- We will not give, offer, authorise, or take bribes in any form – that includes giving or receiving any payments, services, gifts, entertainment, or favours to obtain an improper business advantage
- We will not make facilitation payments, namely payments given to encourage a government employee to perform an existing duty, no matter how small
- We will maintain accurate books and records, and ensure taxation reporting requirements are met
- We do not tolerate third parties engaging in corrupt behaviour on our behalf

How you can help

- Understand that a bribe can be anything of value, not just cash
- Do not offer or give money or anything else of value to someone in exchange for securing any advantage for Cambridge
- Never do anything through a third party that you are not authorised to do yourself
- When in doubt, ask for help. If you are concerned, contact the Business Ethics and Compliance team for guidance

Gifts and hospitality

While it can be common to exchange gifts and hospitality in many professional/cultural situations, we take care to ensure that these courtesies do not create a conflict of interest or otherwise violate the law or our Code.

Our organisational responsibilities

- We do not offer or accept business / cultural courtesies where doing so could influence or appear to influence a business decision or where it could compromise or be reasonably seen to compromise the receiver's judgement, integrity, or impartiality
- We are committed to only offer or accept business / cultural courtesies that are appropriate, proportionate, traceable, and transparent

- Review our Gifts and Hospitality policy before offering or accepting business / cultural courtesies
- Seek prior approval for business / cultural courtesies when required by Cambridge policy
- Keep accurate records of all business / cultural courtesies you give or receive

Charitable and political activities

We use integrity and caution when contributing to charitable causes and do not participate in political activities outside of lobbying efforts directly related to our organisational activities.

Our organisational responsibilities

- We will not use charitable donations as bribes or to otherwise further sales activities or influence decision making activities
- We do not make corporate political contributions to any political party, political action committee, or candidate running for a government political office
- Our political activities are limited to lobbying efforts directly related to our business which have been authorised by the Executive Board

How you can help

- Obtain the required approvals before using Cambridge funds for charitable giving purposes.
 For assistance, please contact our Head of Community Engagement
- Never commit Cambridge funds to any political party or candidate
- Take steps to ensure that your personal political opinions are not viewed as those of the organisation and never pressure another employee to join any political effort

Conducting our activities to benefit society

All employees are warmly encouraged to give their time to volunteering, fundraising, and supporting schools and young people in reaching their potential.

Volunteering and charitable giving form an important part of the Cambridge culture and our colleagues, across our offices worldwide, are encouraged to engage with volunteering and charity efforts and to contribute to their local communities. This includes personally supporting their local communities in areas of disadvantage; supporting sustainability initiatives; and helping more people reach their potential. During fy23, more than 500 colleagues volunteered nearly 2,800 hours to a variety of projects. Of these, 90 colleagues gave nearly 630 hours to environmental activities.

We partner with educational charities internationally and our colleagues are encouraged to fundraise, support and volunteer with them. Nearly £188,000 was donated to many causes, £13,600 of which was raised by colleagues, through a wide range of activities and UK Give As You Earn, with £13,500 added from matched funding. More than 200,000 books were donated.

Global trade

We are committed to complying with applicable export and import controls, money laundering regulations, international sanctions regimes, and other relevant laws in the countries in which we operate. We have zero tolerance for tax evasion or the facilitation of tax evasion.

Our organisational responsibilities

- We will maintain accurate and appropriate import, export, and customs records
- We aim to perform sanctions checks on appropriate individuals before doing business with them
- We will not tolerate tax evasion or the facilitation of tax evasion
- We will follow local laws and regulations when entering into agency agreements or participating in public tenders

- Remember that no business result justifies violating international laws and regulations
- Familiarise yourself with and observe our Finance policies, including the Payments Policy, Tax Policy and the Trade Compliance Framework.
- Seek guidance from Finance, Legal and Business Affairs or Global Operations if you have any questions about doing business in a particular country or proceeding with a particular practice or transaction

Quality and standards

We put the needs and expectations of our customers and stakeholders at the heart of everything we do and only offer quality products and services which conform to our standards.

Our organisational responsibilities

- To maintain quality and standards and achieve excellence we use management systems to provide control, assurance, and resilience
- We make it clear what each person is accountable for and empower our colleagues to make decisions
- We strive for continuous improvement and are transparent when things go wrong and focus on learning not blaming

How you can help

- Make sure you understand the processes you are involved in and your responsibilities within those processes
- Highlight risks, issues, and improvement opportunities
- Be open, honest, inclusive and constructive when discussing where something has gone wrong

Regulations governing assessments

Many of our assessments are regulated by national agencies, such as Ofqual in England. We believe our regulatory obligations are best met by putting the interests of learners first and maintaining public confidence in the integrity of the assessments we provide.

Our organisational responsibilities

- We recognise that regulations governing assessments extend beyond the development, delivery, and award of qualifications and impact many other areas of our work
- We work to identify and manage issues and risks which could adversely impact learners or the integrity of our qualifications
- We provide adequate resources and arrangements to develop, deliver, and award our qualifications

- Understand the importance and impact of regulations across the organisation
- Promptly raise any issues which are likely to cause Cambridge to not comply with relevant regulations
- Seek guidance from our regulatory teams if you have any questions about our regulatory obligations

Protecting our information and assets

Privacy and personal information

We respect and protect the human right of confidentiality and privacy of all individuals who entrust us with their personal information including learners, parents and guardians, customers, employees, and third parties. Protecting this information is our responsibility, not just a legal requirement.

Our organisational responsibilities

- We are committed to exercising care when dealing with information that could be used to identify an individual (Personal Information) including names, email addresses, purchase history, test scores, financial records, online identifiers, biometric data, or opinions
- We take additional precautions when handling Personal Information relating to children or young people
- We are transparent about our privacy practices and how individuals can contact us with questions or concerns

How you can help

- Only collect Personal Information for legitimate business purposes and only retain it as long as it is needed
- Only share Personal Information with those who have a legitimate need to know and whose access is appropriately authorised
- Promptly report any actual or suspected unauthorised uses, disclosures, or access to Cambridge data or Personal Information to reportit@cambridge.org and/or privacy@cambridge.org

Confidentiality of live assessment materials

Maintaining the security of our assessments is essential for fairness, validity, and reliability, and for retaining trust in our qualifications. We must protect the confidentiality of all live assessment materials including question papers, mark schemes, and associated materials.

Our organisational responsibilities

- We implement and maintain appropriate technological solutions and physical measures to protect the confidentiality and security of live assessment materials
- We limit access to live assessment materials to those who need such access to fulfil their job responsibilities

- Always assume that assessment materials are confidential unless you are told otherwise by the relevant assessment manager
- Do not disclose confidential information about any assessment or assessment materials
- Do not seek access to live materials unless authorised to do so as part of your job and do not disclose materials to unauthorized colleagues
- Immediately report any potential or actual breaches of confidentiality to the relevant assessment compliance teams

Improving our impact on society and the environment through our actions

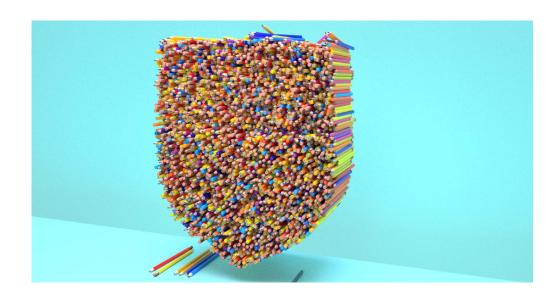
Human rights and modern slavery

We support universal human rights and oppose illegal or inhumane labour practices. We advocate for the adoption of fair and equitable practices across our supply chain and seek to lead by example through our own organisational efforts.

Our organisational responsibilities

- We are committed to upholding and complying with the UN Declaration of Human Rights and modern slavery legislation
- We continuously endeavour to conduct robust due diligence to ensure that no one in our supply chain is violating human rights
- If we identify any abuse within our supply chain, where appropriate, we will work with our partners to improve conditions, but we will not hesitate to report abuses
- We embrace the principle of collective consultation and give our colleagues the remit to drive and enact real change in our operations

- Respect the human rights of everyone you interact with professionally, including learners, parents and guardians, colleagues and contracts, teachers and other educators, customers, supply chain workers, and the broader community
- Conduct any third-party due diligence required by your position
- If you suspect that a Cambridge supplier or business partner is violating human rights, such as child labour, promptly report the issue



Environmental stewardship

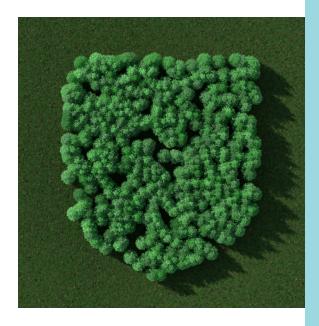
We recognise the climate crisis and take bold action to respond to address it along with other global challenges. We aim to be a world leader in the drive for a sustainable world and seek to maximise the positive impact of our actions at the local, national, and international level through communication, collaboration, partnership working, and advocacy.

Our organisational responsibilities

- We consider short and long-term environmental impact when making all financial and business decisions
- We support innovations that reduce our impact on the environment or make a positive contribution to its improvement
- We aim to be carbon zero for our energyrelated emissions by 2048 and work to drive down carbon emissions across our supply chain
- We continuously endeavour to encourage our business partners to share our commitment to sustainability, and educate and engage our people, learners, teachers and partners on climate and sustainability issues
- We operate a rolling programme of improvements to adapt our approach as we improve our understanding and learn from experience
- We set goals and targets that are informed by evidence and embed the latest sustainability research in our products and services

How you can help

- Always consider ways in which you can reduce or remove the negative impact of our activities on both the planet and people
- Work to ensure that our resources are used efficiently, managed properly and waste avoided
- Always seek to meet or surpass relevant environmental legislation and regulatory controls
- Continually improve processes to minimise consumption of natural resources and energy and seek to add value wherever possible
- Seek to work in partnership with colleagues, partners and experts to create meaningful change and innovation.



Improving society and the environment through our products and services

We are a proud participant in the UN Global Compact and support the furtherance of the UN Sustainable Development Goals. We report on our progress to advance the sustainability of our operations annually via our UN Global Compact Communication on Progress. In it, we outline how, through the commitment of our people and a focus on our mission to contribute to society through education, we aim to serve learners around the world in a way that considers the wider social and environmental impact of our actions.

This year, colleagues from across the organisation have come together to form an EU Deforestation taskforce. With executive level approval and agreement from the Environmental Governance Board, the creation of the taskforce ensures dedicated resources and expertise are allocated to fully understand and address the specific demands of the EU Deforestation Regulation and devise a plan to implement requirements. The taskforce has split into 3 workstreams to ensure that full delivery of compliance solutions is completed by December 2024. The complexity of the project has led to a comprehensive engagement plan being created, alongside a clear communication plan with tailored engagement strategies to ensure we address the specific needs of each stakeholder group and leverage existing relationships and industry networks to facilitate information sharing.



