

Sophia HIGH SCHOOL

CODE OF ETHICS POLICY

2025 - 2026

Code of Ethics

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Code of Ethics

Introduction

Sophia High School expects the highest ethical standards from employees and other personnel in carrying out its business.

This code of ethics outlines our core ethical principles and gives our employees guidelines on how to conduct themselves as a representative of Sophia High School. The values in this code of ethics are integral to the conduct of the business and upholding the integrity, responsibility and reputation of Sophia High School.

All employees should act honestly, fairly and with transparency and should not act in a manner which could discredit themselves or Sophia High School, or put themselves in a position which may result in a conflict of interest.

Sophia High School respects the rule of law and requires all employees to conduct its business in a way that ensures compliance with the rules that apply to Sophia High School.

Supporting Policies

A number of the principles in this Code are supported by more detailed policies to guide employees outlined in the staff book.

All employees are required to comply with Sophia High School policies. Staff sign their acceptance of policies at the start of employment and annually in the Autumn Term

Scope

This Code applies to all Sophia High School employees, parents, students, supply teachers, regardless of their role or position in the company. This should be read in conjunction with our Acceptance Use and Code of Conduct for Staff, Volunteers and students, including the digital safety agreement.

We expect our suppliers to adhere to this Code or adopt similar ethical standards.

Breach of This Code

Any breach of this Code may be considered a disciplinary matter and could result in disciplinary action up to and including dismissal. It is therefore very important that all employees read and understand this Code and seek clarification from their manager if anything is unclear.

Key Principles

The key principles below will be more detailed in the document.

Compliance with the law

Sophia High School, its employees and others to whom this Code applies must observe both the spirit and letter of the laws and regulations that apply to the company.

Human rights

Sophia High School complies with employment law in every country in which we operate and respects global human rights principles.

Bribery and corruption

Sophia High School does not permit the bribery of any person involved in Sophia High School business or any employees, parents, students, supply teachers.

Fraud

Sophia High School does not tolerate fraud.

Gifts and hospitality

No Sophia High School employee or family member should accept, solicit or give (directly or indirectly) any improper gift.

Confidential information

Sophia High School 's trade secrets and other sensitive commercial information must be kept confidential subject to any Non-Disclosure Agreements signed by the employee.

Conflicts of interest

Sophia High School 's employees and other personnel must avoid situations where personal interests could conflict, or appear to conflict, with Sophia High School 's interests.

Suppliers

Sophia High School treats its suppliers fairly. We expect the same standards of them as we expect from our employees.

Customers

Sophia High School communicates honestly with customers, charges fair prices and protects customer data.

Competitors

Sophia High School and employees must comply with all competition and anti-trust rules in the countries in which they operate.

Shareholders and other stakeholders

Sophia High School is committed to high standards of corporate governance, transparency and responsibility.

Sophia High School will consider the impact of its decisions on all stakeholders.

Health and safety

Sophia High School will provide a safe and healthy working environment and will not compromise the health or safety of any individual.

Environment

Sophia High School commits to understanding and mitigating any negative environmental impacts. Sophia High School seeks to operate in an environmentally sustainable way and to promote biodiversity and habitat protection.

Employees

Sophia High School values its employees and their diversity. We will develop our people and reward them fairly.

Guidance

- Many business decisions may involve ethical dilemmas. This Code cannot address every possible situation. It is very important that employees recognise when they are in a difficult ethical situation and that they seek assistance as appropriate.
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- The principles in this Code are intended to help guide all employees in the normal course of their work but they are no substitute for common sense and proper internal consultation.
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- If employees find themselves in a situation where they are unsure of the right course of action to take, they may find it helpful to ask themselves the following questions:
 - Is it legal?
 - Is it ethical?
 - Is it consistent with Sophia High School policies and this Code of Conduct?
 - Can they explain it to their family and friends?
 - Would they feel comfortable if it appeared in a newspaper?
- If they still find that they do not know the right course of action to take, if they suspect someone else of acting contrary to this Code, or if they do not understand anything contained in this Code, they should speak with their manager.
- Employees should never hesitate to ask questions, raise concerns, or seek the guidance they need. Sophia High School will not tolerate any retaliation or discrimination against anyone who has reported a concern in good faith subject to the Whistleblowing Policy.

Compliance with the Law

Sophia High School, its employees and others to whom this Code applies must observe both the spirit and letter of the laws and regulations.

Guidance:

- The laws and regulations that apply to Sophia High School are numerous and often complex. If employees have any doubt about whether their conduct – or the conduct of a colleague or their business unit – complies with the law, guidance should be sought from their CEO.

- They should immediately bring to their manager's attention any request that they think may be illegal or in violation of this Code. It is Sophia High School's policy that employees who raise such concerns in good faith shall not experience any form of retaliation. For specific guidance read the Whistleblowing Policy.

Human Rights

Sophia High School is committed to upholding the highest standards of human rights. We Pledge that:

- Sophia High School does not use child forced labour.
- Sophia High School does not allow or condone physical punishment or abuse.
- Sophia High School respects the freedom of individual employees to join, or refrain from joining, legally authorised associations or organisations.
- Sophia High School fully complies with all applicable laws prohibiting human trafficking.
- Sophia High School does not discriminate.

Theft and Bribery

Sophia High School does not permit the bribery of any person involved in the Company's business, or of any employees, parents, students, supply teachers of Sophia High School.

Guidance:

- Employees must not, directly or indirectly, authorise, offer, promise, pay or give a:
Bribe:
A bribe is a reward, advantage or benefit made in order to influence and/or secure an improper advantage. The amount of the bribe offered or paid is irrelevant and it need not actually be paid.
Kickback:
A kickback is the payment or receipt of a payment in return for securing a contract and is a form of bribe.
Facilitating payment:
A facilitating payment is a relatively small payment, or gift, to an official or government employee made to expedite routine services or administrative actions to which the company would already be entitled. Such payments should not be made in any circumstances.

Fraud

Sophia High School does not tolerate fraud.

Guidance:

All employees have a responsibility to be alert to the signs of fraud and to report suspected fraud. Sophia High School defines fraud as any intentional act committed to secure an unfair or unlawful gain. This includes:

- Fraudulent financial reporting.
- Misappropriation of assets (examples include fraudulent expense claims, burglary and property damage, misuse of customer accounts or customer data).
- Theft.

- Bribery or corruption.
- Concealing a conflict of interest.

Sophia High School is committed to the prevention, detection and proper investigation of fraud.

Sophia High School will respond to all incidents of fraud, seeking to recover loss, taking action against those who perpetrate fraud and reporting incidents to the authorities as appropriate. This may lead to prosecution or to disciplinary sanctions up to and including dismissal.

We expect our business partners and supply chains to uphold similar principles for fraud risk management.

Gifts and Hospitality

No Sophia High School employee or family member should accept, solicit or give (directly or indirectly) any improper gift or hospitality.

Guidance:

- Accepting hospitality from, or providing entertainment to, third parties is acceptable if it is reasonably related to a clear business purpose and is modest.
- Employees should be mindful that the donation or receipt of gifts, hospitality or favours may give rise to difficult situations and may be seen as improper inducement to give some concession in return to the donor.
- The following principles should be observed:
 - The giving or receiving of gifts or hospitality should remain appropriate to the business and should be modest.
 - Employees must obtain the consent of their manager before giving or accepting gifts or hospitality.
 - All employees must declare and keep a written record of all hospitality or gifts given or received, and must also submit all expense claims relating to hospitality and gifts to third parties in accordance with our expenses policy and record the reason for expenditure.
 - Gifts, favours or hospitality should never be solicited.
 - Gifts of money should never be offered or accepted.
 - When being offered a gift or entertainment, a good test as to whether it is acceptable is whether or not employees would be able to, or would feel obliged to, reciprocate.
 - Examples of acceptable gifts include:
 - Food and refreshments received during meetings and business events.
 - Rewards from travelling schemes earned by an employee from frequent business trips.

Confidential Information

Sophia High School's trade secrets and other sensitive commercial information must be kept confidential subject to any non-Disclosure or similar agreements signed.

Guidance:

- Confidential information

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- Confidential information should not be used for personal gain. Employees should treat emails with the same confidentiality as other forms of communication.
- The obligation of confidentiality extends to periods after employees cease to work for Sophia High School and includes the disclosure of information to others.

Social media

As part of the recruiting process, there will be a basic social media screening for all candidates.

It is possible that employees may use social media for work purposes (e.g., LinkedIn) or for personal use outside of work (e.g., social networking sites such as Facebook and YouTube or discussion forums). Any social media use should be respectful to Sophia High School, its employees, practices and associated companies. Usage should be relevant, protective of Sophia High School 'reputation and should follow the letter and spirit of the law.

When using social media, employees must not disclose confidential information (including price sensitive information).

It should be made clear in social media postings, or in employees' personal profile, that they are speaking on their own behalf, and that their views do not represent those of their employer (unless they have been authorised to speak on Sophia High School 's behalf). Employees should also be mindful of protecting themselves and their own privacy.

All social media postings on Sophia High School 's channels must be authorised by the Marketing Department.

Data protection

Employees must only collect and retain personal data for legitimate commercial purposes that align with the objectives of the company. They must respect the privacy of personal data relating to employees, customers and suppliers in compliance with current GDPR legislation.

Sophia High School must ensure that its data and information systems comply with current GDPR data protection laws.

Conflicts of Interest

Sophia High School 's employees and other personnel must avoid situations where personal interests could conflict, or appear to conflict, with Sophia High School 's interests.

Guidance:

- Conflicts of interest arise where a person's position or responsibilities within their business unit present an opportunity for personal gain above the normal rewards of employment.
- They can also arise where personal interests are inconsistent with those of their employer, or create conflicting loyalties in respect of transactions between their employer and a third party.

- Employees must not be involved with an activity for personal gain which is in conflict with Sophia High School's business interests and objectives. Any of their personal interests, or the interests of a member of their immediate family in relation to Sophia High School's business must be disclosed to their manager immediately.
- Employees must not work simultaneously for any of Sophia High School's competitors, customers or suppliers.
- If employees are unsure as to whether a conflict of interest exists, they should seek advice from a manager.

Suppliers

Sophia High School treats its suppliers fairly. We expect the same standards of them as we expect from our employees.

Guidance:

- The integrity of our dealings with suppliers is critical to the long-term success of Sophia High School. We will pay our suppliers, contractors and agents in accordance with agreed terms in a timely manner.
- We will conduct a procurement questionnaire to ensure our major suppliers share similar codes of ethics with regard to employee work conditions, fair and equal pay and commitments to more sustainable environmental work practices. We will not enter any business arrangements with suppliers who do not share these values.

Customers

Sophia High School treats customers with fairness and respect. We are honest in our communications, fair and transparent with our pricing and take great care with customers' data.

Guidance:

- Our customers' security, wellbeing and opinion of us is of the utmost importance.
- We will advertise and market our services honestly, not over-inflating claims and using clear language alongside verifiable facts and figures.
- The process for pricing our services will be done reasonably, fairly, and consistently.
- Whenever we collect, process or store customers' data we ensure we stick to the following principles:
 - Protected: We keep our customers' data secure and make sure it doesn't fall into the wrong hands.
 - Appropriate: We only use customers' data in ways that customers consider appropriate and responsible.
 - Open: We are clear and transparent with customers about how we use personal data.
 - Choice: We provide customers with choices over how we use their data.

Competitors

Sophia High School and its employees must comply with all competition and anti-trust rules in the countries in which they operate.

Guidance:

- Sophia High School welcomes and encourages free and open competition in the marketplace.
- Sophia High School welcomes and encourages collaborations with competitors towards common social and environmental goals.
- Sophia High School will compete vigorously, but fairly and legally.

Shareholders and Stakeholders

Sophia High School is committed to high standards of corporate governance, transparency and responsibility.

Guidance:

- Sophia High School engages actively and constructively with all who are interested in the success of its business, and welcome regular and open dialogue.
- Our Articles of Association enshrine our commitment to having a positive social and environmental impact, as well achieving financial success, and allow us to consider all stakeholders and not just shareholders when making business decisions.

Health and Safety

Sophia High School will provide a safe and healthy working environment and does not compromise the health or safety of any individual.

Guidance:

- Sophia High School 's aim is committed to continual improvement in health and safety performance throughout our operations.
- Sophia High School has high standards of care for the safety of our people, services and operations, and for the environment in which our people work.
- Sophia High School will provide the necessary training and resources to allow for the safe performance of day-to-day activities.
- Every Sophia High School employee has a legal duty to look after their own health, safety and welfare and that of those around them.
- Sophia High School will assign a health and safety officer to ensure that this guidance is met.
- Employees are expected to immediately report any hazardous conditions, injury or accident within the workplace.
- Personal Protective Equipment will be provided by Sophia High School where necessary.
- Employees are encouraged to offer suggestions to improve this guidance.

Environment

Sustainability is a critical part of Sophia High School 's ethos. We strive to understand, manage and mitigate any negative environmental impacts and to amplify the positive effect that we have. Sophia High School is committed to achieving a healthy environment and aims to integrate environmental considerations with economic, cultural and social factors.

Guidance:

Sophia High School will:

- Prevent, or otherwise minimise, any harmful effects of its operations on the natural environment.
- Continually look for ways to reduce the environmental impact of our operations and services.
- Encourage all employees to conduct their work with regard to the highest environmental practices and minimise the waste of natural resources.
- Take active steps to promote biodiversity.
- Look to ways of reducing the environmental impact of our supply chain through conducting a procurement questionnaire to ensure our major suppliers are committed to creating a more sustainable environmental working practice.

- In developing projects that may impact the environment, Sophia High School will:
- Encourage environmental responsibility throughout each step of the project.
- Be proactive with environmental risk management rather than mere compliance.
- Give considerations to:
 - Reducing greenhouse gas emissions.
 - Protecting nature and local ecosystems.
 - Minimising waste.
 - Preserving water quality.
- Build partnerships with local communities to encourage and educate on environmental preservation.
- Include environmental impact in the decision-making process.