

## Application

This policy applies to the CPCT Board and all Common Purpose staff, programme participants, customers and all that come in contact with Common Purpose.

## Our Vision

To give people the inspiration, skills and connections to become better leaders at work and in society.

## Commitment

In line with our Charter, while delivering this Vision we will:

- commit to acting honourably and with integrity in all our business dealings;
- ensure that no financial, political or other inducements to gain or retain work are offered or accepted by or on behalf of The Common Purpose Charitable Trust;
- recognise the duty of confidentiality in all our relationships and give it the highest importance;
- identify and address appropriately any potential conflicts of interest or threats to our independence;
- endeavour to raise the ethical standards globally in the market in which we operate; and
- integrate ethical considerations into our charitable and business decisions.

## In practice

The Trustees and Executive will:

- take steps to see that all personnel are aware of and follow the Policy;
- if required, provide such training, advice, information as may be necessary to personnel at all levels;
- appoint a member of the Board with responsibility for ethical business practices;
- where appropriate require our clients, joint venture partners, stakeholders, contractors and other advisers to have a similar Ethical Standards Policy or accept ours; and
- highlight this ethical policy and any commercial partnerships or sponsorships in our yearly accounts, as recommended by the Charity Commission.

## Outcomes

In meeting these objectives, we will:

- operate in line with the values of our Charter
- comply with all legal and other applicable requirements of the countries in which we work, including the general data protection regulation, money laundering rules, the bribery act; and Charity Commission guidelines;
- justify the trust of our clients and stakeholders by giving their interests first priority in the work we do for them; and
- achieve a performance which will sustain the long-term success of Common Purpose and enhance our reputation.

## Ethics - global procedure

### 1. Introduction

Our Charter states: *"Common Purpose remains independent and non-aligned. We are always balanced and owe no historical or other allegiance to any other group. Our independence is reflected in our governance, finances, partnerships, behaviour and curriculum."* This code of practice is part of safeguarding that independence.

The ethical values of integrity, openness and fairness apply to all the activities of an organization. It is important not only to have standards, but also to demonstrate to clients and stakeholders, and under possible media scrutiny, that such standards are being met; there is considerable reputational risk – something Common Purpose must always be mindful of - associated with ethical failures at a time when anti-corruption issues are high on the media and wider global agenda. Global organizations that are exposed to diverse local business practices are particularly at risk.

The Board accepts responsibility to see that the values, principles and standards of business conduct underpinning how Common Purpose operates are established and applied globally and in accordance with the Ethical Standards Policy has nominated a member of the Board to be responsible for ethical practices.

This code of practice is intended to provide guidance on acceptable practice to ensure that these values, principles and standards are being met. Our behaviour will be judged against these standards.

### 2. Dignity & Respect at Work

All employees and CPCT Trustees have the right to be treated with dignity and respect. It is the policy of Common Purpose not to tolerate any form of harassment and coercion to staff, programme participants, contributors, or any other persons we encounter throughout the world. Those who are alleged to have harassed may be subject to the disciplinary procedure. This procedure applies to all employees of Common Purpose globally, including employees in their probationary period. Under the Equality Act 2010, harassment is unwanted conduct which is related to one of the following: age, disability, gender reassignment, race, religion or belief, sex and sexual orientation and is therefore unlawful.

Harassment in the workplace includes behaviour, such as derogatory or discriminatory remarks or actions, by an individual or group, which causes another individual or group to feel threatened, humiliated, patronised, or harassed, or which interferes with job performance, undermines job security, or creates a threatening or otherwise unpleasant working environment. There are various forms of harassment.

A key point for all is that harassment is conduct which is unwelcome or unacceptable to the recipient or an observer of that conduct. It is the impact of your conduct on the recipient or an observer that determines what is acceptable behaviour rather than your intentions or what your personality would find acceptable or unacceptable. It must never be assumed that, because the recipient has said nothing, he or she consents to offensive conduct.

Common Purpose follows the ACAS recommended procedure when dealing with harassment to ensure everyone feels safe to voice their concerns.

## 3. Financial inducements

- The Common Purpose Charitable Trust will not, in any circumstances, make or offer to make a payment or transfer anything of value for the purposes of improperly obtaining or retaining business, charitable activities or any other improper business advantage.
- The Common Purpose Charitable Trust does not permit 'facilitation' payments (payments made to expedite or guarantee government services that we are legally entitled to e.g. connection of water, customs clearances) as these are prohibited in most countries. The only circumstances in which a facilitating payment should be authorised is where there is a real risk to your health and/or safety, or that of a third party, if such a payment is not made. In such event the payment should be reported so that actions can be taken as appropriate.

## 4. Using third parties (including agents) or working in a Joint Venture

- Against the framework of this policy, The Common Purpose Charitable Trust will carefully consider whether a proposed partnership is appropriate and in the best interests of the charity, in accordance with the best practice recommendations of the Charity Commission.
- The Common Purpose Charitable Trust commits to undertaking appropriate due diligence on all agents, Associates, sponsors and Joint Venture partners, and where appropriate, sub-contractors that we work with, consulting with other charities or
- In accordance with our Charter, The Common Purpose Charitable Trust excludes working with cities, organizations or individuals if they deliberately promote the use of violence, oppose freedom of speech, or incite race or religious hatred.
- We will not risk public confidence and support by choosing to work with an organization whose behaviour and values are inconsistent with the Common Purpose's core work, aims, values, image and Charter. Partnerships with companies whose commercial objectives would conflict with these areas, or which could promote inaccurate or misleading messages about our commitment to them, would not be appropriate.
- If we are required to use agents, consultants or representatives in particular countries they must have a clearly defined scope of service, appropriately proportionate recompense and agree to abide by the applicable laws and the terms of this policy as we may be liable for any financial inducements that our agent makes, or offers to make.
- Any agency or joint venture agreements that we enter into should require the partners to comply with all applicable anti-bribery laws and to comply with this policy.
- The Common Purpose Charitable Trust should reserve the right under any such agency or joint venture agreements to terminate the arrangements if there is a breach of any applicable laws or of this policy.

## 5. Cause related Marketing, Affinity Marketing and Product Endorsements

- The Common Purpose Charitable Trust does not endorse or approve products and services of any company. A statement to this effect may be included alongside any branding or promotion associated with products.
- The Common Purpose Charitable Trust will not share access to our database, Common Purpose Office, to any third parties except for the database supplier and any Common Purpose entities who are signatories to the Common Purpose Controller to Controller Data Transfer Agreement.

## 6. Gifts & Entertainment

- When deciding to accept any particular donation, the Trustees have a duty to demonstrate to the Charity Commission that they have acted in the best interests of the Charity, and that association with any particular donor does not compromise our ethical position, harm or reputation or put future funding at risk.
- Employees should exercise discretion in accepting or offering gifts or hospitality and in determining whether it is appropriate you should ensure you are aware of the circumstances and implications of the offer.
- Gifts and entertainment may be perceived as a financial inducement and should never be offered or accepted where the purpose is to gain an improper business advantage.
- Wherever possible, gifts from clients should be shared within the group that has been involved in the project.

The following should be considered when determining if it is appropriate to accept or offer a gift or entertainment:

- Any gifts or entertainment should be of a modest value, occur occasionally and be appropriate in all the circumstances. If you would feel embarrassed that colleagues or anyone outside of the Common Purpose Charitable Trust knew about the gift, it is likely to be inappropriate.
- The hospitality must have a legitimate business or charitable purpose. It is not acceptable to accept hospitality if our contact will not be present, and vice versa.
- It is important to consider if the recipient is allowed to accept gifts, as government officials and public bodies may be unable to do so.
- As a general rule, we should only offer as gifts and entertainment what we would be comfortable to accept; and vice versa.
- There are some gifts and entertainment which cannot be accepted without prior approval from your Line Manager; these include, but are not limited to money; hospitality that lasts more than one day and that involves meals and/or travel being paid for.

## 7. Competition

- Competition, however fierce, should always be undertaken honestly and fairly.
- You must not use improper means to obtain information about our competitors.

## 8. Confidentiality

- Information that is not in the public domain or that may be regarded as confidential in relation to the Common Purpose Charitable Trust's operations or concerning any other organization with which you, in the course of your work, have had dealings, must be kept confidential.
- You are reminded that there are laws in many countries that prohibit the use of confidential or unpublished information for insider trading on the stock market.

## 9. Conduct & performance at work

- You are expected to apply due skill, care and diligence in the services that you provide for customers. You should, at all times, work to the best of your ability.
- It is your personal responsibility to acquaint yourself with the legal standards and restrictions that are applicable to the location in which you are working any to comply with these in all respects.

- Many of the professional bodies of which staff are members have ethical standards or Codes of Ethics that we individually, and corporately, should strive to adhere to.
- We strive to apply the beliefs, aims and ethos of the Common Purpose Charter through the Charter@work. This means we aspire to the highest levels of skill and professionalism both with our customers/participants and with our colleagues.

If you are a line manager you should:

- Promote ethical behaviour and compliance with the policy
- Monitor compliance with the policy and enforce it as is necessary
- Support employees who ask questions or raise concerns in good faith.

## 10. Client Activities

- If you are reasonably concerned about the ethical aspects of a particular project or charitable activity, you will be allowed to decline involvement following appropriate consultation and agreement with your Line Manager.
- If you are reasonably concerned about ethical aspects of a client's activities, you will be allowed to withdraw from working with that client after appropriate consultation and agreement with your Line Manager and Grandparent.

## 11. Conflicts of Interest

The Common Purpose Charitable Trust's professional duty extends to not placing ourselves in a position where any conflict of interest is likely to arise. Where any potential conflict does arise, we must identify it and ensure it is appropriately addressed. Where we have more than one role on the same project for different clients:

- Follow the procedures for identifying all job opportunities through job application forms.
- Seek client agreement to the arrangements.
- Implement effective information barriers between project teams so that teams are from separately located groups, led by separate project directors, and operating effectively as separate organizations.
- You must not allow your private interests to influence your judgment or decision making on behalf of The Common Purpose Charitable Trust.
- You are not prohibited from owning shares in businesses of any customers, partners, contractors or competitors but it is essential that these business dealings do not raise a conflict of interest or give the appearance of doing so and you must comply with insider trading legislation at all times.
- Jobs/affiliations of close relatives may give rise to the appearance of a conflict of interest and this should be taken into account.

You may be asked to serve on the Board of Directors or as a Trustee of another organization and such roles can provide opportunities for personal development as well as building experience and relationships in new areas. Approval must be sought from your Line Manager, in consultation with the CEO, in the following circumstances before such a post may be accepted:

- Where there is a conflict of interest or where one might arise; or
- Where there are, or may be perceived to be, concerns in respect of time and commitment, financial exposure, or our independence or reputation.

## 12. Political Contributions

- Common Purpose Charitable Trust funds or facilities may not be used to make political contributions to any organization or candidate for public office. You are not restricted from contributing financially, from your own funds, to political campaigns or from participating, in your own time, in political campaigns (unless doing so presents a risk to Common Purpose's independence).

## 13. Asking Questions & Raising Concerns

- The Common Purpose Charitable Trust encourages all staff to discuss any queries or concerns that relate to ethical practices.
- If you have a concern or suspect that a breach of this policy has occurred or may occur, you have a duty to report these concerns.
- You may report suspected breaches of this policy anonymously, although you are encouraged to identify yourself so that a full investigation is possible. Investigation may not be possible or effective where reports are anonymous. We will conduct any investigations sensitively and will take all reasonable steps to keep your identity confidential but in some cases disclosure will be unavoidable.
- All potential breaches of this policy that are reported in good faith will be investigated responsibly.
- The Common Purpose Charitable Trust will not tolerate any form of retaliation against individuals who report, in good faith, breaches or potential breaches of this policy.

If you would like to ask a question or to report a suspected breach, you should:

- Direct all queries through your Line Manager in the first instance.
- Where this is not possible or appropriate, employees may choose to contact their Grandparent or the nominated member of the Board of Trustees.

## 14. Disciplinary Procedure for breach

- Failure to comply with the spirit or letter of this policy may result in significant reputational damage to The Common Purpose Charitable Trust. Breaches of the law, of any country, are a serious matter which may subject The Common Purpose Charitable Trust and/or individual employees to civil and criminal penalties.
- In addition to the above, where individuals are in breach of the terms of their contract of employment they may be subject to disciplinary action, up to and including termination.

## 15. The Board

- The Board accepts responsibility to see that the values, principles and standards of business conduct underpinning how Common Purpose operates are established and applied globally.
- The Board also accepts responsibility for adhering personally to these standards in any work carried out in their role as Trustee of The Common Purpose Charitable Trust.
- In accordance with the Ethical Standards Policy the Board has nominated a member of the Board to be responsible for ethical practices.
- The Board acknowledges that unresolved disputes between licensees over alleged breaches of the Ethical Standards Policy may be referred to the Trust Protectors in relation to issues of independence and/or balance and/or the appointment of Chairs of Key Managers, in accordance with the Sub-Licence Agreement, Schedule K.

# Common Purpose Ethical Standards Policy



- The Trust Protectors themselves accept responsibility for adhering personally to these standards in any work carried out in their role as Common Purpose Trust Protectors.

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