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Letter from the Chief Executive

With more than 6,000 employees, offices in many lands, and hundreds of business partners, Oxford University Press (OUP) is a truly global organization. It is essential that everyone who works with OUP understands our goals and the manner in which we will achieve them, regardless of their location.

This Partner Code of Conduct has been created to give our business partners a clear view of the values and principles that underpin all our work. Many of the principles in this code focus on compliance with laws and regulations. Such compliance is our minimum standard. In addition, we want to ensure that everything we do and say is consistent with our mission and values and upholds the first-class reputation of the University of Oxford, of which we are a part. Our employee Code of Conduct reflects the same principles.

We choose our business partners with great care, ensuring that they are the most competent, ethical, and reliable. We value our business relationships with them and are committed to making these honest and open. In return we expect all of our business partners always to act in accordance with this Partner Code of Conduct.

Thank you.



Nigel Portwood, Chief Executive, OUP

OUP's mission

Oxford University Press is a department of the University of Oxford. It furthers the University's objective of excellence in research, scholarship, and education by publishing worldwide.

At OUP we have a clear mission which informs everything we do: to create world-class academic and educational resources and services and to make them available across the world. We share the University's uncompromising standards, defining qualities, and belief in the transformative power of education to inspire progress and realize human potential.

Working together

It is important to us that all of our business partners exhibit high ethical standards and principles, in adherence to our Partner Code of Conduct, which was created so that we can share our mission, values, and main principles.

The term "business partner" in this Code refers to customers, suppliers, authors, agents, government officials, and any other person or organisation with which OUP has a business relationship. Where a business partner is an organisation, the term refers to the owners, directors, employees, and associates of that organisation.

In working with you, we want to:

- Uphold our mission and values at all times
- Make sure everything we do is ethical and lawful
- Ensure our business relationships are open, honest, and successful
- Create a sustainable future

Our principles cover:

- Ethical practices
- Business partners
- Intellectual property
- Confidentiality
- Records and data
- Social responsibilities
- · Anti-slavery and human trafficking

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OUP's principles

OUP's Code of Conduct for employees underpins the way we work. It sets out all of our principles of working. Below and on the following pages we set out those principles we consider most important and relevant to our business partners. We expect our business partners to have the same principles of working. (The Code of Conduct with the full list of principles can be found on our website.)

Ethical practices

- We are committed to the highest standards of integrity and we comply with the laws and regulations of every country in which we do business.
- We do not offer, promise, give, request, agree to receive, or accept bribes no matter what the value or local business practice may be. This applies to all business partners with whom we deal. We also expect business partners acting for or on behalf of OUP not to give or receive bribes or to make improper payments.
- We do not make facilitation payments, nor do we allow other people to do so on our behalf.
- We take appropriate action to prevent all forms of fraud, and will take steps to prevent the facilitation of tax evasion.
- We ensure that any gifts or hospitality we give or receive are always clearly for business purposes and are reasonable and appropriate.
- We do not make political donations.

- Our charitable donations are appropriate and properly authorised and, except in special cases, are made for educational purposes.
- We do not engage in anti-competitive practices, such as price fixing, bid-rigging, or collusion with our competitors.
- We do not engage in coercive practices, such as threats or blackmail.
- We expect our employees to avoid situations where a conflict of interest may occur between their own interests and our business interests.
- We expect our business partners to report to OUP all instances of suspected or actual bribery, fraud, or other breaches of OUP's ethical practices, in relation to their business activities with OUP (see OUP contact details on the final page of this Code).

OUP's principles

Business partners

- We value the confidence and trust of our business partners, and will always communicate honestly, openly, and reliably with them.
- When business partners contact us we respond professionally, politely, and within appropriate timescales.
- We welcome business partner feedback and try whenever possible to act on such input to improve our services.
- We always try to ensure that our product information, advertising, and other forms of communication are clear, accurate, and honest.
- We expect to receive payments for goods and services we supply to business partners from their nominated bank accounts.

Intellectual property

- We protect OUP's intellectual property (trademarks, design rights, copyrights, proprietary information, and trade secrets) at all times.
- We respect intellectual property rights throughout the world, including the intellectual property rights of our business partners, and equally we expect our business partners to respect OUP's intellectual property rights.

Confidentiality

- We expect OUP's plans and information to be treated as confidential, and not to be disclosed to people outside our organization unless it is necessary, properly authorized, and appropriate steps have been taken to secure the data.
- We never permit OUP's plans and information to be disclosed for individual private benefit.
- We respect confidentiality obligations to third parties, including competitors and business partners.
- We do not allow unauthorized confidential third party information to be retained, shared with others, or used for our benefit.

Records and data

- We maintain records that fairly and accurately reflect our business transactions as they occur.
- We do not knowingly provide false information.
- We comply with local data protection laws.

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Social responsibilities

- We support universal human rights including equal employment rights, safe workplaces, freedom of speech and of association, and the rights of all to an education.
- We pay fair wages in line with the norms for the industry and market and do not require OUP employees to work excessive hours, particularly where this might have an impact on personal health and safety.
- We are committed to promoting and maintaining a culture of equality and diversity and, as a minimum, we comply with national legal requirements wherever we operate.
- We treat our colleagues with dignity and respect, and promote a safe environment free from discrimination, harassment, and victimization.
- We ensure our work environments are healthy and safe and do not put ourselves or others at risk.
- We are mindful of our impact on the environment and endeavour to minimize the impact of our operations on our surroundings.

Anti-slavery and human trafficking

- We oppose illegal or inhumane labour practices, including the use of forced or child labour.
- We take steps to ensure that employment is freely chosen, and that there is no slavery or human trafficking in our business or its supply chain, and we expect our business partners to do the same.
- We oppose harsh or inhumane treatment of workers.

Making sure our Partner Code of Conduct is understood

Every business partner working with OUP has access to our Partner Code of Conduct through our website. In addition, we will send our Partner Code of Conduct directly to many business partners, either electronically or on paper. We ask that all business partners ensure that they have read and understood this Partner Code of Conduct and will act in accordance with the principles and values it sets out, and we may ask some business partners to confirm this to us in writing.

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Reporting your concerns and further information

If you become aware of matters in relation to your business activities with OUP which are inconsistent with this Partner Code of Conduct, it is very important that you report them to OUP.

You should raise your concerns by email with the OUP Group Compliance Officer (groupcomplianceofficer@ oup.com). The Group Compliance Officer is independent of OUP's divisions and individual businesses, and all reports received will be treated in strict confidence.

Alternatively, reports of concerns can be submitted on an anonymous and confidential basis to OUP's ethical reporting hotline – Speak Up. E-mail SpeakUPOUP@expolink.co.uk

Telephone Call the operator to make a collect call to +44 (0) 1249 661 808

Web site https://wrs.expolink.co.uk/speakupoup

If any matters in this Partner Code of Conduct are not clear, or you have questions or require further information, please contact the Group Compliance Officer at the above email address.





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