

Oxford University Press

Code of Conduct 2014



Understanding our mission
and values and the manner in
which we will achieve them.





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Nigel Portwood

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Letter from Nigel Portwood

Oxford University Press (OUP) is a growing and thriving organization, currently employing more than 6,000 people across the world. Our work spans a broad spectrum of publishing genres, education and research systems, and geographies but we are united by one mission, shared values, and a range of important principles that we pursue and uphold throughout our work. These are captured within our Code of Conduct, which we first launched in 2012, and which we update and reissue annually.

The OUP Code of Conduct has become an important tool for many of us. It is a useful summary of the most important principles we must abide by in order to operate legally and with the highest levels of integrity. It refers to other global policies and guidelines that explore specific issues in more depth, and which we are all required to read and understand. In your work with colleagues or with external clients and partners, it provides support in making a wide range of decisions that might impact your collective work and behaviour. It also demonstrates a commitment by OUP to protect and value the first-class reputation of the University of Oxford of which we are a part.

The 2014 edition of the Code of Conduct contains a few updates, so it is important for all employees to read it again, even if you are familiar with previous editions. We supply the Code of Conduct in 18 languages and we ask you to confirm that you have read the Code via a formal acknowledgement system.

Thank you for continuing to ensure that OUP is an organization of which we can all be proud.



A handwritten signature in blue ink that reads "Nigel Portwood".

Nigel Portwood
Chief Executive, OUP

Our mission and values

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 Oxford University Press we have a clear mission which informs everything we do; to create world-class academic and educational resources and to make them available across the world. We do this because we are part of the University of Oxford, one of the world's most influential and prestigious centres of learning.

Our work today is rooted in nearly 500 years of publishing history and several important values.

- We believe that access to education and research changes lives for the better, and so we create high-quality resources that inspire learning and provide new insights.
- We believe that trust underpins all of our work; from building strong relationships with our authors, customers, suppliers, and colleagues to ensuring that everything we do is honest and appropriate.

- We value the University's excellent reputation and strong global brand, and believe that our actions must support these important assets.
- We believe that we must continue to innovate in order to maximize the value we bring to the creation and dissemination of academic and educational resources.

In addition to being guided by our mission and these values, we must also uphold the University's charitable status through all of our work. This means that the University's primary purpose is at the core of all we do, and we apply our resources responsibly in pursuit of that purpose.

The following set of principles guides all of our work around the world.

The people we work with

OUP employees

- OUP seeks to recruit people who share its values and will contribute to its success.
- We are committed to promoting and maintaining a culture of equality and diversity and, as a minimum, we comply with relevant legal requirements wherever we operate.
- We respect the knowledge, skills, and experience that each individual brings to their work here, and we endeavour to involve our colleagues to the best of their abilities.
- We try to create a working environment that people find stimulating and enjoyable, and where learning opportunities are available.
- We treat our colleagues with dignity and respect, and promote a safe environment free from discrimination, harassment, and victimization.
- We endeavour to provide safe and healthy workplaces.
- We respect our colleagues' privacy and right to a life outside work.
- OUP employees can expect fair remuneration for doing their job.

We have two global policies that provide further guidance on aspects of employment in our organization:

- Pre-employment Vetting Policy
- Health and Safety Policy of Intent

If you need help with locating and understanding these policies, contact your HR Manager.

Suppliers, authors, and other partners

- When choosing suppliers, authors, partners, or any organization or individual with whom we do business, we choose the most competent and reliable.
- We value our relationships with suppliers and other partners and endeavour to create honest, open, and reliable working practices.

We produce a Partner Code of Conduct for all of our suppliers, authors, customers, agents, government officials, and any other business partner with whom OUP has a business relationship. We make this available to the majority of our partners. If you need help with locating and understanding the Partner Code and how to use it in your work, contact your Divisional Compliance Manager or Officer.

The way we operate

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 local business practice may be. This applies to current or would-be suppliers, authors, partners, customers, government officials, or any other party. We also expect third parties acting on behalf of OUP not to bribe.
- We do not make facilitation payments, nor do we allow third parties to do so on our behalf.
- We take appropriate action to prevent all forms of fraud within OUP.
- We expect you to report any instances of suspected bribery or fraud, and in return OUP commits to investigating them appropriately.
- We ensure that any gifts or hospitality we give or receive are for proper business purposes and are reasonable and appropriate.
- We do not make political donations.
- We do not engage in collusive practices such as price-fixing with competitors or bid-rigging on tenders.
- We do not engage in coercive practices such as blackmail.
- We have a duty to avoid situations where there might be conflict between OUP’s interests and our own interests.
- We do not manage directly or report to another member of staff with whom we have a close personal relationship.

- As individuals we don’t compete with any activity or business of OUP’s, directly or indirectly, or use the knowledge gained here to help anyone else to compete with or undermine us.
- We don’t make personal investments that might affect our business judgement. For instance, we don’t have personal interests in companies that compete with or do business with OUP unless we have disclosed this interest to the Group Legal Department and they have approved it.
- We treat OUP property with respect and we make sure that it is not used for personal purposes except in special, authorized circumstances.

We have eight global policies that provide further important details on our ethical practices:

[Bribery and Fraud](#)

[Gifts and Hospitality](#)

[Raising Ethical Concerns](#)

[Charitable Giving](#)

[Conflict of Interests](#)

[Collusive and Coercive Practices](#)

[Ethical Marketing](#)

[High- Risk Business Activity](#)

If you need help with locating and understanding these policies, contact your Divisional Compliance Manager, Divisional Compliance Officer, or the Group Compliance Officer.

The way we operate

Customers

- We value the confidence and trust of our customers, and will always endeavour to communicate honestly, openly, and reliably with them.
- When customers contact us we respond professionally, politely, and within appropriate timescales.
- We welcome customer feedback and try wherever possible to act on it to improve our services.
- We always try to ensure that our product information, advertising, and other forms of communication are clear, accurate, and honest.

Intellectual property

- We protect OUP's intellectual property (trademarks, design rights, copyrights, proprietary information, trade secrets) at all times.
- We follow OUP's global Corporate Visual Identity Manual for guidance on use of our logo and other brand marks.
- We respect intellectual property rights throughout the world, including the intellectual property rights of our suppliers, authors, partners, and any organization or individual with whom we do business.

Confidentiality

- We treat OUP plans and information as confidential, and don't disclose them to people outside our organization unless it is necessary and we are authorized to do so. We never disclose information for our own or others' private benefit.
- We take due care with our computers, laptops, and other mobile devices to ensure that sensitive information cannot be mislaid or stolen.
- When we receive a media or external enquiry about OUP which is not directly related to our products or is unusual in any way, we refer it to the appropriate PR or communications department (Group or Local). We don't attempt to respond ourselves unless asked to do so by a member of our Divisional Board or the Group Communications Department.

We have a Global Media Policy, Global Social Media Policy, and other Information Security Policies in some locations that provide further information. Our Group Legal Department and Group Communications Department can provide more information about intellectual property, data protection, and confidentiality, should you require it.

The way we operate


Our records and data

- We maintain records that fairly and accurately reflect our business transactions as they occur.
- We don't make false or misleading entries. We follow all our control and financial policies.
- We don't knowingly provide false information to OUP or about OUP externally.
- We are each responsible for protecting information when handling other people's personal data, whether it relates to an employee or a customer.
- We comply with local data protection laws.

Charitable giving

- As a department of the University of Oxford, OUP is part of a charity. This means that OUP's charitable giving is restricted to organizations that share a similar educational mission to that of the University.
- We support a number of organizations on a longer term basis including several that donate books to educational outlets in developing countries and widen access to education and research. We also make one-off donations of publications and small financial gifts to many small charities every year.
- We don't make any donations without first consulting OUP's global Charitable Giving Policy or the Group Communications Department.

Our 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 oppose illegal or inhumane labour practices and expect our suppliers and other partners to do the same.
 - We are mindful of our impact on the environment and endeavour to minimize the impact of our operations on our surroundings. We have a Global Environmental Policy that provides more information about our practices.
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Making sure our Code is widely understood

Everyone working for OUP receives a copy of the Code, either electronically or on paper. It is also available on OUP's intranets (Oxford Share and any local intranet sites) and our corporate website.

- All managers are responsible for ensuring that their team members receive a copy of the Code, and that they understand all of the principles.
- If there is anything in the Code of Conduct that you don't understand, or if you want some guidance, you can ask for help from the following people:
 - Your manager
 - Your HR Manager
 - Your Divisional Compliance Manager
 - Group Compliance Department (see contact information on page 11)
 - Group Legal Department (see contact information on page 11)
 - Group Communications Department (see contact information on page 11)
- All employees will receive an annual reminder about OUP's Code of Conduct, whether or not there are any changes to the content of the document. It is assumed that every individual will read the document on receipt, send an acknowledgement that they have understood it, and retain an easily accessible copy for reference on a day-to-day basis.

Reporting your concerns

If you think someone is acting in a way that is inconsistent with OUP's Code of Conduct, then it is important that you take action. You can report it to your manager, but if you feel uncomfortable doing so, you have several choices:

- For ethical concerns, please contact your local Divisional Compliance Officer.
- For employment matters, please contact a member of your local HR team.
- You can contact the Group Legal or Compliance Departments (details on page 11).
- Or contact the Compliance and Ethical Concerns Helpline, a confidential telephone and email service. Details about the service can be found in OUP's Raising Ethical Concerns Policy. The phone numbers and other relevant contact details can be found on Oxford Share.

More resources and contacts

Many OUP policies are referred to within the Code of Conduct. Most are Group-wide policies and we include a list of these below. All OUP global policies are available on Oxford Share. There are also other policies of local relevance. If you have trouble locating the policies please ask your manager or HR Manager for help.

Please be aware that where a specific clause in this Code of Conduct is not consistent with local laws, the local laws will prevail.

Group-wide policies:

Pre-employment Vetting Policy	Ethical Marketing
Health and Safety Policy of Intent	High-Risk Business Activity
Bribery and Fraud	Corporate Visual Identity Manual
Gifts and Hospitality	Global Media Policy
Raising Ethical Concerns	Global Social Media Policy
Charitable Giving	Global Environmental Policy
Conflict of Interests	
Collusive and Coercive Practices	

The Code of Conduct is available in the following languages, copies of which can be downloaded from Oxford Share or are available from your HR Manager or the Group Communications Department:

Arabic	Russian
Bahasa Malaysian	Spanish (European)
Brazilian Portuguese	Spanish (Latin American)
Chinese	Swahili
English (British)	Taiwanese
Hindi	Thai
Japanese	Turkish
Korean	Urdu
Polish	Vietnamese

Group Compliance Department

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Group Legal Department

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Group Communications Department

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