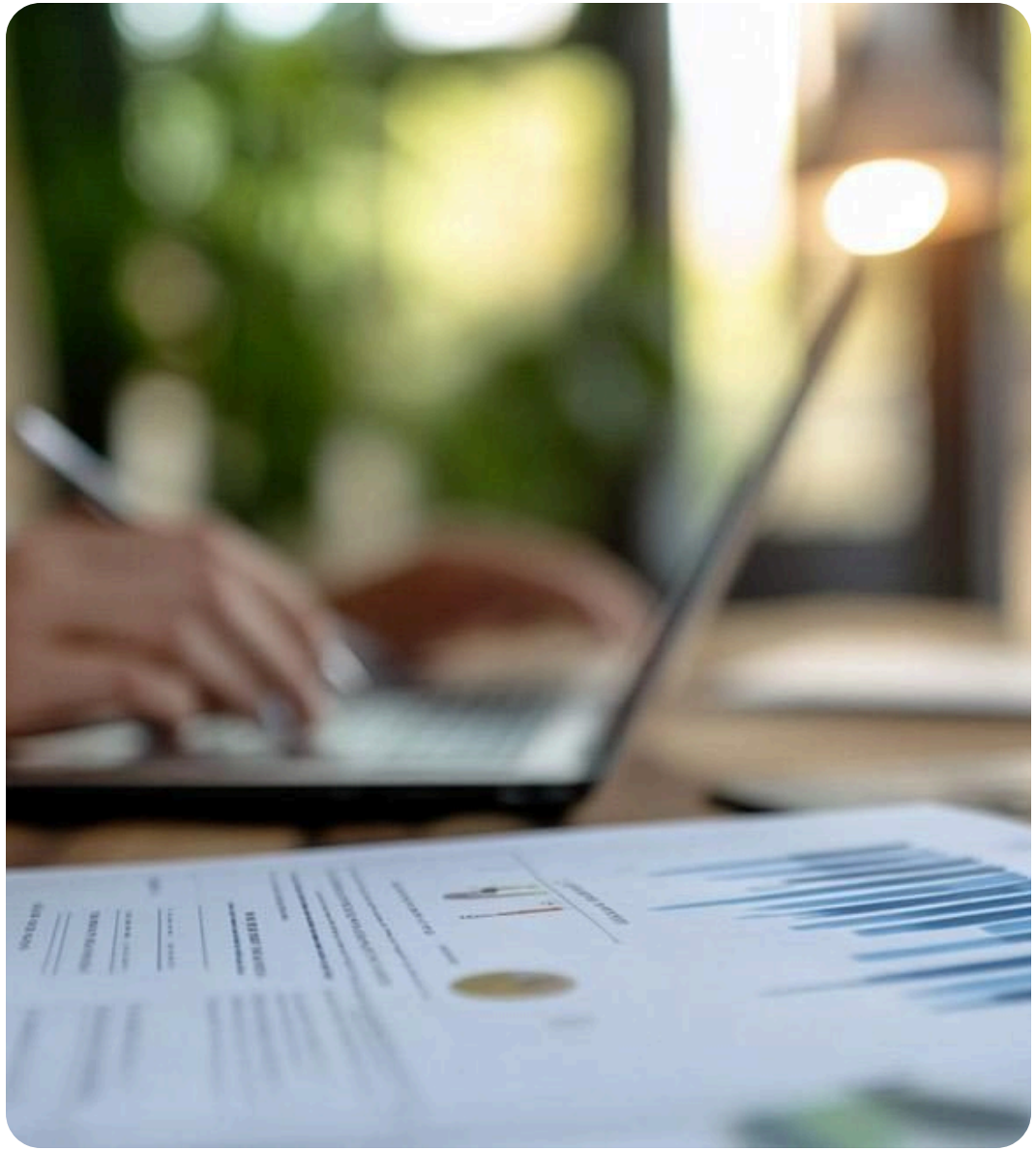
Open eLMS
Established in 2003

Code of Conduct

How we treat our people, clients, suppliers and the planet: the standards everyone at Open eLMS works to.

OPEN ELMS POLICY



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From the Chief Executive Officer

At Open eLMS, we are driven by more than profit; we aim to make a genuine difference. Our core values of honesty, fairness, and inclusion are central to the services we provide and how we treat our clients and employees.

Open eLMS leads by example: we do the right thing because it is the right thing to do. This is reflected in our commitment to paying suppliers within 28 days of a valid invoice, reducing our carbon emissions, and profit sharing with our team.

I encourage you to read through this Code of Conduct and consider how it applies to your role. Are you honest in your dealings with others? Are you fair to your clients and colleagues? And are your decisions free from bias, unconscious or otherwise?

Thank you for your commitment to these standards.

Emil Reisser-Weston

Chief Executive Officer, Open eLMS



Why this code matters

2

Objective

This policy outlines the standards of conduct expected at Open eLMS. These rules protect our employees, the company, and our customers. Inappropriate conduct risks compromising our services, our legal standing, and the trust of our learners and partners.

3

Overview

We are committed to protecting Open eLMS users (including employees, contractors, consultants, and temporary workers) and the business from illegal or damaging actions. Responsible business conduct is a company-wide commitment, and every associated person is responsible for understanding and following these policies.

Who this code applies to



This policy applies to anyone conducting Open eLMS business or interacting with our networks, systems, clients, or suppliers, regardless of whether equipment is company-owned, personal, or provided by a third party.

All employees and affiliates are responsible for exercising good judgement regarding information use, electronic devices, and professional behaviour, ensuring compliance with local laws and company standards.

SECTION 5

Code of Conduct

Fair treatment of employees, financial integrity, countering corruption, information security and raising concerns.

Open eLMS
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Respect, integrity and equal opportunity

Open eLMS fosters a diverse and inclusive culture built on respect, integrity, and ethical behaviour.

5.1.1 ANTI-DISCRIMINATION AND HARASSMENT PREVENTION

Employees will be treated fairly and with respect. Equal opportunity is central to our ethos; all employment decisions are based on merit, qualifications, skills, and achievements.

Nobody will be treated less favourably because of any of the nine protected characteristics in the Equality Act 2010: age, disability, gender reassignment, marriage and civil partnership, pregnancy and maternity, race (including colour, nationality and ethnic or national origin), religion or belief, sex, and sexual orientation. This applies to all our dealings with employees, job applicants, contractors, suppliers and customers.



No harassment of any kind

What harassment is

Harassment is unwanted conduct related to a protected characteristic that violates a person's dignity, or creates an intimidating, hostile, degrading, humiliating or offensive environment for them, whether or not that was intended. Sexual harassment is unwanted conduct of a sexual nature with the same purpose or effect. We will not tolerate harassment of any kind, in person or online, by colleagues, clients or anyone else we deal with.

Our duty to prevent it

Under section 40A of the Equality Act 2010, in force since 26 October 2024, we must take reasonable steps to prevent the sexual harassment of our employees. We do this by making these standards clear to everyone, training our staff, dealing promptly and fairly with every complaint, and protecting anyone who raises one. For full details, please refer to our Anti-Discrimination Policy.

A safe and healthy workplace

Open eLMS is committed to providing a safe environment for employees, partners, vendors, and visitors.

Every employee is responsible for prioritising health and safety by:

- Promptly reporting all unsafe or hazardous conditions to supervisors.
- Complying with all applicable laws, regulations, and standards regarding working conditions.
- Adhering to all workplace safety and industrial hygiene policies.

Accordingly, employees must not:

- Undertake work-related activity while under the influence of alcohol or drugs.
- Continue any work that becomes unsafe or unhealthy.
- Assume that others will report a risk or concern.

5.2.1 Financial integrity and intellectual property

Our intellectual property and confidential information are vital assets that must be protected against misuse or theft.

To maintain financial integrity, employees and affiliates must adhere to the following policies.

Internal training is provided to foster continuous improvement in protecting our data and IP.

1. **Password Policy**
2. **Supplier Security Policy**
3. **Data Protection and Information Security**
4. **Information Classification Policy**
5. **Social Media Policy**
6. **Security Incident Management Policy**

Declare conflicts of interest

Conflicts of interest can significantly impact our business.

These are categorised as actual, perceived, or potential conflicts. Any such instance must be reported to management immediately.

The following situations warrant reporting a conflict of interest:

- A family member or close personal contact serving as a public official.
- A family member or close personal contact who works for a competitor, customer, or supplier.
- A substantial financial interest in a competitor, supplier, or customer.
- Any interest in a supplier or customer if you or your team are involved in selecting or negotiating with them.

Zero tolerance for corruption and bribery



Accordingly, employees must not:

- Divert business opportunities that arise during their role at Open eLMS for personal gain.
- Allow personal, financial, or political activities to affect their professional objectivity.
- Provide services to competitors, customers, or suppliers without prior written approval.

Open eLMS operates a zero-tolerance approach to any instance of corruption or bribery.

Accurate accounts, honest gifts

5.2.3 Financial Accountability

Open eLMS is committed to accurate financial reporting and meeting all legal requirements. All employees are expected to conduct their duties with care regarding financial matters. We pay our suppliers within 28 days of a valid invoice.

5.2.4 Gifts and Hospitality

Gifts and hospitality must never be offered, given or accepted to influence a business decision, or where they could look as if they might. Doing so can be a criminal offence under the Bribery Act 2010.

- Anything worth more than £30 must be politely declined or, where that is not possible, recorded and declared to the Managing Director, who decides whether it can be kept.
- Cash, or anything that can be used like cash, is never accepted or offered.

£30

gift and hospitality limit

Occasional, reasonable gifts and hospitality worth up to £30 may be accepted or offered.

Secure information, safe to speak up

5.3 Information Security

Please refer to the Data Protection & Information Security Policy for full details on information security conduct.

5.4 Raising Concerns (Whistleblowing)

If you suspect wrongdoing at work, such as a crime, a danger to someone's health and safety, damage to the environment, a breach of a legal obligation, or an attempt to cover any of these up, tell us as early as possible. You do not need proof, only a reasonable belief that it is true.

How to raise a concern

- Raise it with your line manager or, if that is not appropriate, with the Managing Director, by email to info@openelms.com.
- We will treat your concern in confidence, look into it promptly and tell you the outcome where we can.
- For free, confidential advice, you can contact Protect, the whistleblowing charity, at protect-advice.org.uk. You can also report your concern to the relevant prescribed person or body, such as the Health and Safety Executive or HM Revenue and Customs (gov.uk/whistleblowing).

Workers who make a protected disclosure are protected by the Public Interest Disclosure Act 1998. Nobody will be dismissed, disciplined or treated unfairly for raising a genuine concern, even if it turns out to be mistaken, and anyone who victimises a person for raising one will face disciplinary action.

SECTION 6

Corporate Social Responsibility

Corporate Social Responsibility is a set of actions that make our business more conscientious, impactful, and sustainable for our clients, suppliers, and the wider community.

Minimising our footprint

Paperless working

As environmental sustainability becomes increasingly critical, Open eLMS strives to minimise its footprint. Operating paperless reduces our environmental impact and enhances security; we encourage employees to remain mindful of paper use and recycle where possible.

Energy and travel

We also focus on reducing energy consumption. Please ensure computers, monitors, and lights are switched off when not in use. We prioritise virtual meetings via Zoom or Teams to reduce travel.

1%

of online sales to carbon removal

Separately from these reductions, Open eLMS gives 1% of its online sales to carbon dioxide removal through Stripe Climate. We do not count this as a reduction in our emissions. Our Environmental Policy and Carbon Reduction Plan set out our emissions and how we reduce them.

A positive force, honest marketing

6.2

Community Impact

Open eLMS aims to be a positive force within the local community. We are proud to sponsor Shinfield Cricket Club, supporting physical health and mental wellbeing. We welcome suggestions for local sponsorship opportunities.

6.3

Marketing Responsibly

Our marketing is conducted with integrity and transparency. Our efforts must:

- Adhere to all applicable marketing laws.
- Describe products and benefits truthfully.
- Respect modern standards of decency.
- Consider environmental impact (e.g., avoiding disposable corporate giveaways).

SECTION 7

Remote and Flexible Working

We empower our employees to work in ways that enhance both productivity and wellbeing. Our flexible working culture is built on trust and autonomy.

Trust, autonomy and outcomes

7.1 Empowering Autonomy

Employees are trusted to manage their schedules responsibly. We encourage open dialogue with team leaders to structure hours in a way that maintains collaboration while respecting personal commitments.

7.2 Outcomes Over Hours

We prioritise results over rigid schedules. Success is measured by the quality and timeliness of outcomes rather than hours spent at a desk.

7.3 Remote Work Expectations

To maintain professionalism, remote workers are expected to:

- Maintain regular communication via Teams, email, or project platforms.
- Be available during agreed core hours.
- Ensure data security and confidentiality at all times.
- Maintain a work environment conducive to focus.

Tools, support and work-life balance

7.4

Technology and Support

We provide the digital tools and support required for effective remote collaboration, including access to learning platforms and cybersecurity resources.

Under the Health and Safety (Display Screen Equipment) Regulations 1992, staff who work at a computer, at home or elsewhere, can ask at any time for a workstation assessment, and for the equipment they need to work safely and comfortably.

7.5

Work-Life Balance

We respect personal boundaries. Employees are encouraged to disconnect outside working hours to support their mental and physical health.



Policies, sanctions and implementation

8

Additional Policies and Standards

Additional Open eLMS policies are available internally to all employees and can be provided to clients upon request.

9

Sanctions

Open eLMS employs technical and administrative methods to monitor compliance with security policies. Violations may lead to disciplinary action, up to and including termination of employment or contracts.

10

Implementation

Technical teams are responsible for implementing the controls required for the secure operation of Open eLMS assets. These controls support our legal compliance, including GDPR, and our duty of care to all stakeholders.

Who is responsible

1

Open eLMS

The company employs best practices to ensure the Confidentiality, Integrity, and Availability of all company assets.

2

Data Protection Lead

Our data protection lead is responsible for policy compliance, providing security guidance, and managing the exception process.

3

Business Management

Managers are responsible for implementing policies within their areas and ensuring staff adherence.

4

Personnel

All personnel must act in a manner that complies with these policies in both content and spirit, reporting any known violations.

Exceptions and document ownership



12 Exception Process

Any exception to this policy requires prior written approval from our data protection lead. Questions regarding this policy should be directed to emilrw@openelms.com.

13 Document Approval and Ownership

Our data protection lead owns this document. It is reviewed every year and was last reviewed in November 2026. This policy is issued on a version-controlled basis under the authority of Open eLMS senior management. Questions about it can be sent to info@openelms.com.

QUESTIONS

Questions about this policy?

Contact our data protection lead at **emilrw@openelms.com**

openelms.com/code-of-conduct

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