



Code of Conduct

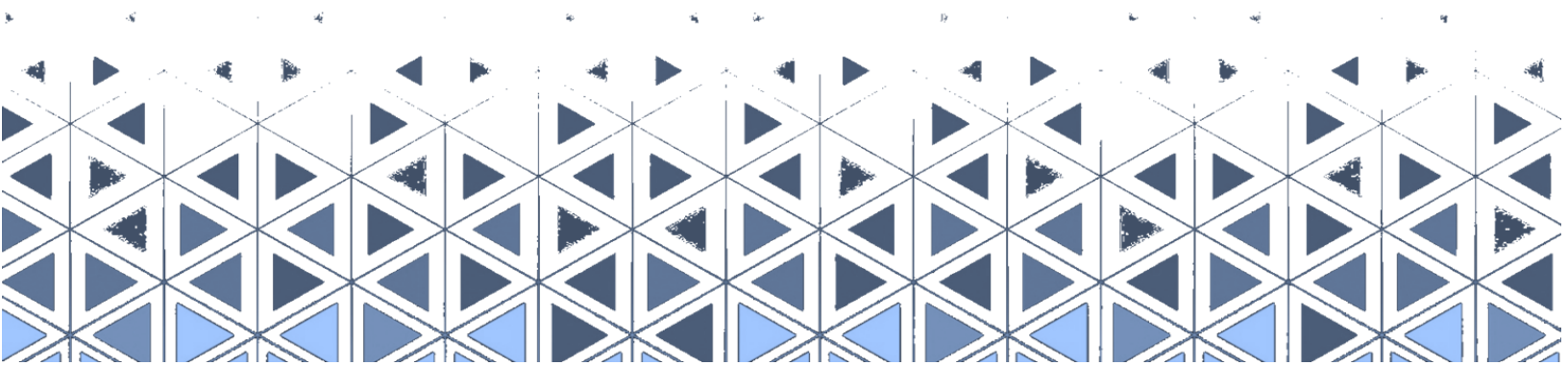


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Amendment History

Title:	Code of Conduct
Responsible Unit:	People and Organizational Development Department
Responsible Officer:	Seyada Mounib – Engy Mansour

Version	Date	Author(s)	Notes	Revision(s)	Approval(s)
V1.0	Feb. 2015	Amin Mohamed	Created for the Employee Handbook	Engy Mansour	Engy Mansour
V1.1	Feb. 2019	Merna Kamel Sarah Samy	Revised as a part of the Employee Handbook	Seyada Mounib	Engy Mansour
V1.2	Nov. 2019	Merna Kamel	Created as a separate policy	Sarah Samy	Seyada Mounib

INTRODUCTION TO CODE OF CONDUCT

Code Applicability

This Code of Business Conduct applies to all MSA University Academic and Non-academic staff.

This code is not a contract of employment.

Code Operation: Decision-Making

MSA University will not tolerate fraud, deceit or concealment.

Decisions must be based on factual evidence and fairness, no bias or prejudice.

Decisions must be based on strict principles of right and wrong as defined set forth in this code.

Compliance with Code

All staff must comply with the code of conduct, which is intended to support the management in; taking good and fair decisions, executing the right and proper actions and to comply with relevant laws, rules and regulations.

All staff covered by this code are expected to demonstrate; integrity and leadership by; complying with the code themselves, promoting, fostering and boosting compliance by others.

Promotion of and adherence to this code are essential elements in evaluating the performance of everyone to whom this code applies.

Reporting and Escalations

MSA University encourages staff if they become aware of any violations or potential violations of the code of conduct, or have complaints or concerns regarding; accounting, internal accounting control, or auditing matters, must promptly and immediately notify the appropriate party or to directly report the case to the Human Resources Division.

For any questions or concerns about interpreting or applying this code, or any related MSA University standards, procedures, policies, or instructions, please contact:

1. Your line-manager, Department head, the faculty Vice Dean, or the faculty Dean
2. Another manager, Supervisor, or Department head
3. A Human Resources representative/ Director
4. A representative in the Legal Affairs
5. The Head of Quality Assurance Centre
6. The University President

Any reports, concerns or complains are kept confidential to the possible extent while still allowing MSA University to investigate and take appropriate action.

MSA University will not tolerate any kind of retaliation or reprisal against anyone who makes a good faith report regarding violation or potential violation of the code.

1. HONEST AND ETHICAL CONDUCT

1.1 Principle 1: Fair Dealing

Each Staff Member will deal honestly and ethically with MSA University's stakeholders, such as academic and non-academic staff, students, workers, suppliers, partners and competitors.

All staff members will treat people fairly and honestly, not taking unfair advantage of anyone through manipulation, concealment, abuse, reprisal of privileged or otherwise undisclosed information, misrepresentation of material facts or any other unfair-dealing practices.

1.2 Principle 2: Avoiding Conflict of Interest

A conflict situation can arise when one of the staff takes action or has interest that may make it difficult to perform our MSA University work objectively, fairly, effectively and efficiently.

Staff members must avoid any investment, interest, or association that interferes or might interfere with the independent exercise of their own individual best judgment, and with their obligation to perform their responsibilities in the best interests of MSA University.

For example: Private business (ex. Training agency, any educational institute or education service provider, Private paid teaching classes ...etc.) as this may lead to contract termination.

When presented with opportunities related to MSA University's business interest, staff members must first offer those opportunities to MSA University.

Staff members will **not**:

- a. Take for themselves personally, or for members of their household, acquaintances or close relatives, opportunities that are discovered through the use of MSA University property, information or position.
- b. Use MSA University property, information, or position for personal gain.
- c. Hold any employment, managerial, directorial, consulting or other position with any company or university which is a competitor of MSA University.

1.3 Principle 3: Bribery and Gifts

Staff members will not; seek, accept, offer, promise, or give (directly or indirectly) anything of monetary value – indicating payments, fees, loans, services, favors or gifts from or to any person/ student or firm as a condition or a result of doing business with MSA University, otherwise it will be considered a sort of bribe. This may lead to legal actions.

1.4 Principle 4: Protection of Confidential Information of Staff/Students and Others

The disclosure of confidential information regarding; MSA University's business, financial, legal, regulatory or scientific operations, whether intentional or accidental, can adversely affect the financial stability and competitive position of MSA University and the job security of its Staff members.

"Confidential Information" means all non-public information in MSA University's possession, whether through; internal or external development that might be of use to competitors, or harmful to the financial stability or competitive position of MSA University if disclosed, including but not limited to:

- Personal data
- Students database
- Financial, accounting data
- Suppliers data (names of suppliers, pricing, source of supply, and anticipated requirements)
- Results of Regulatory inspections/ audit
- Business Plans, and updates to business plans
- Potential business agreements, licenses, partnership, accreditation, or other business deals
- Regulatory filings and approval dates
- Marketing and sales information
- All other know-how trade secrets

Staff members must not accept non-public information provided by staff/student, supplier or other party with the condition or understanding that it is kept confidential unless such information is subject to a written confidential disclosure agreement or confidentiality: provision drafted or approved by the Legal Division.

Staff members must maintain the confidentiality of information entrusted to MSA University by a student/ staff member or other third party, except when disclosure is legally mandated as determined by the Legal Division.

Staff members must not seek or accept confidential information of or about competitor in an illegal or unethical manner.

If Staff members have confidential information about a former Staff Member or any other entity with which they were previously affiliated, they are expected to abide by their obligation to keep such information confidential. MSA University will not require and does not want staff to use or disclose such information in their capacity as a tutor or Staff Member of MSA University.

1.5 Principle 5: Non-Discrimination and Anti-Harassment

MSA University strives to establish and maintain a work environment in which all individuals are treated with respect and dignity and to create an environment that supports, encourages and rewards career and educational advancement based on ability and performance.

The University prohibits discrimination, harassment and retaliation against employees, students, interns, contractors and other third parties conducting business with the University. Discrimination or harassment based on race, gender and/or gender identity or expression, color, creed, religion, age, national origin, ethnicity, disability, veteran or military status, sex, sexual orientation, pregnancy, genetic information, marital status, citizenship status, or on any other legally prohibited basis is unlawful and undermines the character and purpose of the University. These are considered forms of employee misconduct and sanctions will be enforced against individuals engaged in such misconduct.

Any form of retaliation against anyone who has complained of and/or reported discrimination, harassment or has participated in an investigation of such a complaint, regardless of whether the complaint relates to the complaining person or someone else, will not be tolerated, violates this Policy law and may result in discipline.

More information about the Non-Discrimination and Anti-Harassment procedures are provided in details in the Non-Discrimination and Anti-Harassment Policy.

1.6 Diversity, Inclusion and Equal Opportunity

MSA University recognizes its ethical and legal obligation to provide a work environment in which employment opportunities are open to all qualified individuals.

The University states the right of any individual/employee to apply and/or to be evaluated for employment opportunities without regard to any discriminative basis and it guarantees everyone the right to be considered solely based on his/her ability to perform the duties of the job in question, with or without reasonable accommodations as appropriate. In line with its commitment, the University will take affirmative action to recruit, hire, promote, and educate un-presented minorities, women, and individuals with disabilities.

Main Principles

The University is committed to the following principles:

- Staff and students are encouraged to bring their capabilities, approaches, experiences and ideas, which reflect our diversity and inclusiveness.
- All individuals have the right to be given equal and fair consideration for a position/transfer/promotion or other position related benefits regardless of race, colour, sex, sexual orientation, gender identity or intersex status, pregnancy, age, marital status,

physical or mental disability, family or careers' responsibilities, religion, political opinion, national extraction, social origin, and or any other discriminative basis.

- Provides reasonable accommodations for qualified faculty and staff with disabilities to allow them to perform the essential functions of their jobs.
- Insuring that promotion decisions are in accordance with principles of equal employment opportunity by imposing only job related requirements for promotional opportunities.
- Recruiting, hiring, training, retaining, and promoting individuals, in all job classifications, without regard to any discriminative basis.
- Insuring that all personnel actions, such as compensation, benefits, transfers and leave policies, are administered without regard to any discriminative basis.

More information about the Diversity, Inclusion and Equal Opportunity procedures are provided in details in MSA University Diversity, Inclusion and Equal Opportunity Policy.

2. COMPLIANCE

2.1 Principle 6: Compliance with Laws and MSA University Standards, Policies and Procedures

All staff members are required to familiarize themselves with all the laws, rules and regulations that apply in the areas within the scope of our work responsibilities, including, as applicable, the following areas:

- Official Leave(s)
- Academic Promotions
- Academic Degrees
- Deductions & Penalties
- Disciplinary Actions

Contact the Personnel or OD Sections for advice in any area where you have any questions.

Staff members will comply with applicable University policies, and applicable policies and procedures issued by, for example, Departments of People & Organization Development, Purchasing, Quality Assurance, Finance, IT, etc.

3. PROTECTION OF MSA UNIVERSITY RESOURCES

3.1 Principle 7: Protection of MSA University's Assets

Staff members must safeguard MSA University's assets against loss, damage, carelessness, waste, misuse and theft.

MSA University's assets, such as; intellectual property, electronic media, work time, equipment, funds, products and services, are intended for legitimate business use.

Staff members must use MSA University's assets efficiently and for legitimate purposes, never for illegal or unethical purposes.

3.2 Principle 8: Academic Material, Inventions, Discoveries, and Software

MSA University reserves the rights to intellectual property created by Staff members as part of their jobs. Any academic material, course content development material, invention, discovery, product, or device-like software which results from activities carried out at the University or with substantial aid of its facilities or funds must be disclosed to the University, will become the property of the University, will be published on the e-learning system, and will be assigned to the University or a University-designated organization. The best practices should be shared and applied through MSA University.

Guidelines:

- If a researcher, staff member, or student develops any academic material in the course of his/her work, and/or with the aid of unit/University facilities and/or funds administered by it, there is an obligation to disclose academic material to the University.
- Academic Material should be disclosed at the earliest possible date in their development.
- Disclosure should be made with the Center of Excellence.

3.3 Principle 9: Health and Safety

MSA University is committed to protecting the health and safety of its Staff members.

Staff members will act promptly to address any unhealthy or unsafe condition.

This includes taking steps to protect the physical safety and security of MSA University Staff members.

As MSA University considers the health and safety of the staff members a top priority, the Health and Safety dedicated the: safety@msa.eun.eg mailbox to receive any complaint or

suggestion that relates to any arising or immediate safety and occupational health issues at the University.

3.4 Principle 10: Electronic Media Usage

MSA University provides access to and use of electronic mail, the intranet, the internet, and other electronic media for business purposes to make it easier for MSA University staff members to communicate with each other and with appropriate outside parties – including students, suppliers, business partners, affiliates, international agents and government agencies.

Staff members must not use MSA University's electronic media for any other purposes that violate applicable laws, rules and regulations or MSA University standard policies or procedures. This includes; transmission of threatening, obscene or harassing materials.

Incidental personal use of electronic media that does not interfere with MSA University's business or a staff member's performance of his or her responsibilities is acceptable, as long as such use does not include illegal, unethical or otherwise offensive subject matter.

Except as otherwise provided by applicable law, no staff member has any right to privacy regarding use of or access to any electronic media provided by or through MSA University. MSA University may monitor or access staff use of its electronic media at any time in accordance with applicable law.

3.5 Principle 11: Using Competitor's Brand

MSA Staff Members are required to use only:

1. MSA official Emails for any form of communication related to their business.
2. Stationary (office stationary, mugs, glasses, cups, block notes, pens, mouse pads, etc.)
3. MSA official paper with the appropriate header and footer for official communication.

MSA Staff members will not use or promote any competitors brand while being currently employed.

4. GRIEVANCE FOR THIS CODE

Each staff member is responsible for their decision making and for adherence to the principles set forth in this Code of conduct.

4.1 Internal Investigations

MSA University will promptly investigate all alleged violations of this Code, or of any related MSA University standard, policy or procedure. Any allegations will be treated confidentially, to the extent consistent with MSA University's interests and its legal obligations. Staff Members are all expected to cooperate in the investigation of an alleged violation of the Code.

If MSA University determines that corrective action is necessary to fix a problem and avoid the likelihood of its recurrence, MSA University will promptly decide what steps to take, including legal proceedings when appropriate.

4.2 Disciplinary Action

To the extent legally permissible under applicable law, appropriate disciplinary action will be taken, in relation to this Code or any related MSA University standard, policy or procedure, for:

- Authorization of or participation in violations
- Failure to report a violation or potential violation
- Refusal to cooperate in the investigation of an alleged violation
- Failure by a violator's supervisor(s) to detect and report a violation, if such failure reflects inadequate supervision or lack of oversight
- Retaliation against an individual for good faith reporting of a violation or potential violation

Disciplinary action may be activated, when appropriate, including dismissal.

4.3 Disclaimer

All staff members must certify, in writing or electronically, that they have received, read, understood, and shall abide by this Code.