

CODE OF CONDUCT FOR STAFF & FACULTY

The management requires all faculty and staff members to abide by the GCWUS Code of Conduct and maintain the highest standards of work performance and conduct, abide by the established rules and regulations, and to contribute effectively towards accomplishment of GCWUS's goals. This Code of Conduct is binding on all employees throughout the Institute without any exceptions. All employees are required to familiarize themselves with these codes.

Employee Behavior

1.1 Compliance with the Law

Compliance with the local laws in which we operate is an absolute requirement for GCWUS and its employees. Each employee is expected to be familiar with the law as it applies to his/her job, and management shall be responsible for the provision of necessary instruction and advice as appropriate. Although a few employees are legal experts, they are expected to use good judgment and common sense in seeking to comply with all applicable requirements and to ask for advice from management and/or from the Audit or Human Resources function, as appropriate, when uncertain.

Regardless of the sanctions foreseen by the law, any employee guilty of a violation, will be liable to disciplinary consequences because of the violation of his/her employment duties and may entail dismissal from service.

1.2 Responsibility for the Image of GCWUS

To a large extent, the image of GCWUS is determined by our actions and by the way each and every one of us presents and conducts himself/herself. Inappropriate behavior on the part of even a single employee can cause the Institute considerable damage.

Every employee should be concerned with the good reputation of GCWUS in all aspects of performing his/her job.

Every employee must focus on maintaining the good reputation of, and respect for, the Institute.

1.3 Respect for People

Each employee is entitled to fair, courteous and respectful treatment by his or her supervisors, subordinates and peers. GCWUS will not tolerate discrimination or harassment based on race, sex, religion, creed, regional/national origin, disability, age, family status or any other factor.

All employees shall conduct themselves in accordance with letter and spirit of these principles. Any person who believes that he or she has been discriminated against or personally harassed should report the incident and circumstances to his or her immediate manager or Human Resource manager or other senior manager. They will arrange for the incident to be investigated impartially and confidentially.

GCWUS values the individuality, diversity and creative potential that employees bring to its business, and supports the continuous development of their skills and abilities. Judgments about people for the purpose of recruitment, development or promotion should be made on the basis of a person's ability and potential in relation to the needs of the job. Only those elements relevant to the performance of that job should be taken into account. Overall, success and advancement within the group must depend on personal ability and work performance.

GCWUS does not employ individuals under the age of eighteen.

1.4 Honesty and Integrity

We respect the personal dignity, privacy, and personal rights of every individual. There is no discrimination, harassment or offence allowed. We are honest and ethical and stand by our responsibility. These principles shall apply to both internal cooperation and conduct towards external partners.

1.5 Avoiding Plagiarism

GCWUS has stringent rules for students regarding plagiarism when writing their papers, which are available in the form of a booklet on the GCWUS Portal. The same rules apply to faculty members in their research/publications.

1.6 Avoiding Conflict Of Interest

The GCWUS considers it important to prevent its employees from succumbing to conflicts of interest or of loyalty in their professional activities. Such conflicts can come about if an employee is active on behalf of, or has interests in, another company. The following examples of conflict that must be declared and resolved include:

- Having a family interest in a transaction with GCWUS or any supplier of GCWUS, including through a family member acting as an officer of the counterparty company;
- Being an employee or consultant or advisor to, or being a shareholder of any counterparty in a transaction with GCWUS or of any supplier of GCWUS;
- Hiring or encouraging others in the Institute to hire a family member in any capacity who doesn't otherwise qualify on merit;
- Having an interest in a competitor or supplier GCWUS including acting as an officer, director, employee or consultant or advisor to or being a shareholder of any competitor, supplier or joint venture partner;
- Having an interest in an organization that has, or seeks to do business with GCWUS, including acting as an officer, director, employee or consultant or advisor to or being a shareholder of any competitor, supplier or joint venture partner;
- Acting as an elected or appointed official of any branch of government or any government agency, or as an advisor or consultant to any government agency, which has any regulatory or supervisory power over GCWUS;
- Making unauthorized use of the GCWUS name or letterhead or otherwise representing oneself as
 a representative of GCWUS to the public, any governmental agency or public interest group
 regarding policies or positions;
- Having any other business interest or relationship in which it might appear to third parties that an employee has the ability to influence GCWUS's decision-making so as to obtain a monetary or other benefit for the employee, his or her spouse, and child or close family member.
- Intending to begin paid sideline activities; he/she must inform his/her immediate superior beforehand in writing in such an instance. Permission for such activities may be denied if it leads to a decrease in work performance, contradicts the employee's duties within the GCWUS, or threatens to present a conflict of interest. Exceptions are occasional writing activities, lectures, and comparable occasional activities.
- Any employee wishing to know whether an outside business interest represents a conflict of interest
 must ask the designated senior manager in advance.

Handling of GCWUS's Property

1.7 Assets

• Assets of the GCWUS such as vehicles, equipment, furniture & fixtures, machinery, spares etc. are to be used exclusively for GCWUS business, unless specifically authorized, as in the case of Company-assigned cars, laptops, mobile phones, etc.

1.8 Information Handling

- In no case may any information be retrieved or transmitted which incites racial hatred, glorification of violence, or other criminal acts.
- No employee shall be permitted without the consent of his/her superior to make records, databases, recordings or reproductions unless this is done for GCWUS's business.

1.9 Records and Reports

- Open and effective cooperation requires accurate and truthful reporting. This applies equally to the relationship with investors, employees, customers, and business partners, as well as with the public and all governmental offices.
- Any records and reports produced internally or distributed externally must be accurate and truthful.

Confidentiality

- Confidentiality must be maintained with regard to internal matters, which have not been made known to the public.
- The obligation to maintain confidentiality shall extend beyond the termination of the employment relationship.

Data Protection and Security

Personal data may only be collected, processed, or used insofar as this is necessary for
predetermined, clear, and legitimate purposes. High standards must be ensured with regard
to data quality and in technical protection against unauthorized access. The use of the data
must be transparent for those concerned; and the rights of the latter must be safeguarded
with regards to information and correction and, if applicable, to objection, blocking and
deletion.

Electronic Media Usage

- GCWUS provides access to and use of electronic mail, the intranet and the Internet for academic purposes. We do this to make it easier for GCWUS employees to communicate with each other and with appropriate outside parties including contractors, suppliers, and government agencies and other academic institutions.
- Not to use GCWUS's electronic media for any purposes that violate applicable laws, rules
 and regulations or GCWUS standards, policies or procedures. This includes transmission
 of threatening, obscene or harassing materials.
- Incidental personal use of electronic media that does not interfere with GCWUS's business or an employee'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 employee has any right to privacy regarding use of or access to any electronic media provided by or through GCWUS.
 GCWUS may monitor or access officer or employee's use of its electronic media at any time in accordance with applicable law.

Implementation

- The management of GCWUS shall actively foster the widespread distribution of the Code of Conduct and see to it that they are implemented permanently.
- Compliance with the law and observance of the Code of Conduct shall be monitored on a regular basis.
- In none of these areas can the Code serve as an exhaustive statement of policy and practice. Reference should be made, where applicable, to the detailed policies, guidelines and rules referred to above. The standards set out in the Code are general and do not address each and every situation which may confront employees at GCWUS. Guidance on the application of the Code to particular situations should, therefore, be sought from management or from the Human Resources, or Audit functions, as appropriate.
