

CODE OF CONDUCT REGARDING AGENTS RECRUITING STUDENTS TO HIGHER EDUCATION IN FINLAND

The co-operation requires that the Parties are aware of and in compliance with the following aspects of Code of Conduct.

In addition to the specific subject areas defined below we also recommend all our Agents to be aware of and work in compliance with the most important international regulations:

- United Nations Universal Declaration of Human Rights
- ILO Declaration of Fundamental Principles and Rights at Work
- ILO Code of Practice in Safety and Health

The Agent and its employees shall comply with the laws of the country in which it operates as well as this Code of Conduct.

1. Compliance with Laws, Rules and regulations

Obedying the law, both in letter and in spirit, is the foundation on which this Agreement's ethical standard is built. All Agents and undertakers to the Agent must respect and obey the laws, rules and regulations of the cities, states and countries in which the Agent operates as well as the laws, rules and regulations in the country of the Institution which is a party of the Agreement.

2. Accuracy of records and finance

The Agent shall have accurate record-keeping consistent with all applicable standards.

3. Business operations

The Agent employees may not give or accept gifts, favours, entertainment or other inducements unless they:

- are consistent with common business practices
- are not excessive in value and cannot reasonably be construed as a bribe or payoff
- do not violate applicable law

The Agents employees shall not, directly or indirectly, offer promise, give request, demand or accept a bribe or other improper benefit to obtain or retain business.

The Agent shall comply fully and in good faith with the applicable antitrust and competition laws and regulations.

The Agent shall establish and maintain appropriate procedures to evaluate and select subcontractors on their ability to meet the requirements of the Code of Conduct.

4. Labour

The Agent shall provide a safe and healthy working environment and shall take reasonable steps to prevent accidents and injuries.

Workplace violence, including threats, threatening behaviour, harassment, intimidation, assaults and similar conduct will not be tolerated.

The Agent shall strive for equal employment opportunities for all qualified individuals without distinction or discrimination.

The employees of the Agent should not be allowed to distribute, possess, use or work under the influence of drugs or alcohol while recruiting students.

The Agent shall work for that all employees shall treat one another with courtesy, dignity and respect, regardless of gender.

The Agent shall ensure that:

- wages paid for a standard working week at least meet the legal or industry minimum
- standards are sufficient to meet the basic needs of the employees
- wages and benefits are rendered in full compliance with all applicable laws

The Agent shall comply with applicable laws and industry standards on working hours.

The Agent shall guarantee that working hours and working conditions will comply with all statutory requirements.

The Agent shall neither tolerate the use of child labour when conducting business, nor accept products from subcontractors that utilize child labour in the contracting, subcontracting or other relationships.

5. Information

The Agent will clearly communicate to the prospective student that it is possible to apply to the program/education directly to the Institution itself, without using an Agent. This information should also be provided on the Institution's website.

No negative comments in any form should be made by the Agent regarding competitors. If prospective students ask the opinion on other institutions of higher education, which the Agent does not represent, the Agent should not answer such questions but invite the prospective student to address the question directly to the institution concerned. The Agent may not prevent any other institution to provide information, e.g. interfere with information given by others.

The Agent will report to the Institution on a regular basis and in accordance with guidelines provided by the Institution. The guidelines can also include how the Agent shall provide the Institution with statistical information.

6. Anti-discrimination policy

The Institution is committed to basing judgement concerning the admission and education of individuals upon their qualifications and abilities. In accordance with the Institution's antidiscrimination policy, the Agent cannot discriminate services provided against any individual on account of the individual's sex, race, marital status, color, religion, age, sexual orientation, political opinions, functional impairment, nationality or ethnic origin.

7. Environment

The Agent shall comply with or strive for exceeding environmental requirements set by applicable laws, ordinances and international agreements.

8. Conflicts of Interest

A “conflict of interest” exists when a person’s private interest interferes in any way - or even appears to interfere - with the interests of the Institution. A conflict situation can arise when an Agent takes actions or has interests that may make it difficult to perform his or her commitments under the Agreement objectively and effectively. Conflicts of interest may also arise when an Agent, or a member of his or her family, receives improper personal benefits as a result of his or her commitments to the Agreement.

Conflicts of interest are prohibited. Conflicts of interest may not always be clear-cut; whenever there is any doubt of whether a situation should be regarded as a conflict of interest the Agent should consult with the Institution. Any Agent or undertaker hired by the Agent who becomes aware of a conflict or potential conflict should bring it to the attention of the Institution.