



SURKOVSKY CENTRE LTD

CODE OF CONDUCT

Professional Standards, Ethics and Corporate Behaviour

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1. Introduction

Surkovsky Centre Ltd is an independent international organisation established to advance education, scientific research, innovation, publishing, consultancy and professional development.

The Centre seeks to create meaningful connections between scientific knowledge, education and professional practice. Through interdisciplinary cooperation, evidence-based research and international partnerships, the Company contributes to the development of individuals, organisations and society.

This Code of Conduct establishes the ethical and professional framework governing every activity undertaken by Surkovsky Centre Ltd.

The purpose of this document is not merely to define acceptable behaviour, but to promote a culture founded upon integrity, academic excellence, responsibility, transparency and respect for human dignity.

Every individual representing Surkovsky Centre Ltd shares responsibility for maintaining the reputation, credibility and professional standing of the organisation.

This Code complements the Company's governance framework and shall be read together with all applicable Company Policies, Procedures and legal obligations.

Failure to comply with this Code may constitute misconduct and may result in disciplinary or contractual action.

2. Mission, Vision and Core Values

Mission

The mission of Surkovsky Centre Ltd is to promote education, scientific knowledge and innovation through responsible research, high-quality learning opportunities, international collaboration and professional consultancy.



The Centre supports lifelong learning and contributes to the development of evidence-based solutions addressing contemporary social, educational, technological and organisational challenges.

Vision

The vision of Surkovsky Centre Ltd is to become an internationally respected centre recognised for academic excellence, professional integrity and meaningful contributions to education, research and society.

The Company aspires to build long-term partnerships with universities, research institutions, governments, professional organisations and industry throughout the world.

Core Values

Every activity undertaken by Surkovsky Centre Ltd shall reflect the following principles.

Academic Excellence

We pursue the highest standards of education, scholarship and professional competence.

Scientific Integrity

Research shall always be conducted honestly, objectively and responsibly.

Independence

Professional judgement shall remain free from improper influence or personal interest.

Transparency

Our decisions and activities shall be open, accountable and capable of independent scrutiny.

Respect

Every individual shall be treated with dignity, fairness and professionalism.

Innovation

We encourage creativity, critical thinking and responsible adoption of emerging technologies.

Lifelong Learning

Continuous education and professional development are fundamental principles of our organisation.

International Cooperation

We actively support international partnerships founded upon mutual respect and shared knowledge.

Public Benefit

The knowledge created by Surkovsky Centre Ltd should contribute positively to society.



Ethical Leadership

Leaders within the organisation shall demonstrate integrity through their own conduct and decision-making.

All employees, researchers, lecturers, consultants, contractors and representatives are expected to incorporate these values into every professional activity undertaken on behalf of the Company.

3. Scope

3.1 Purpose

This Code of Conduct applies to every individual acting on behalf of Surkovsky Centre Ltd, regardless of the nature of their appointment, contractual relationship or location.

Compliance with this Code is a fundamental condition of employment, engagement, representation and cooperation with the Company.

3.2 Persons Covered

This Code applies to, but is not limited to:

- Directors;
- Officers of the Company;
- Employees;
- Researchers;
- Academic staff;
- Lecturers;
- Trainers;
- Consultants;
- Contractors;
- Visiting researchers;
- Visiting lecturers;
- Interns;
- Volunteers;
- External advisers;
- Temporary workers;
- Agency staff;



- Individuals representing the Company at conferences, meetings or public events.

Third parties acting on behalf of Surkovsky Centre Ltd are expected to uphold standards consistent with this Code.

3.3 Geographical Scope

This Code applies to all activities undertaken:

- within the United Kingdom;
- internationally;
- online;
- during business travel;
- at conferences;
- during research activities;
- during educational programmes;
- during meetings with public authorities, universities, companies and partner organisations.

Professional standards shall not change because activities take place outside Company premises.

3.4 Responsibility

Every individual covered by this Code is personally responsible for:

- understanding its contents;
- complying with its requirements;
- seeking guidance where uncertainty exists;
- reporting breaches where appropriate;
- acting in a manner consistent with the values of Surkovsky Centre Ltd.

Managers and senior personnel carry an additional responsibility to lead by example and promote an ethical organisational culture.

4. Ethical Principles

Ethics are fundamental to every activity undertaken by Surkovsky Centre Ltd.

The Company expects decisions to be guided not only by legal requirements but also by professional judgement, integrity and responsibility.



The following principles govern all Company activities.

4.1 Integrity

Integrity is the foundation of professional credibility.

Every representative of Surkovsky Centre Ltd shall:

- act honestly;
- avoid deception;
- honour commitments;
- communicate truthfully;
- protect the reputation of the Company.

Professional integrity shall never be compromised for personal, financial or political advantage.

4.2 Independence

Professional judgement shall remain independent.

No individual shall allow:

- financial interests;
- personal relationships;
- political influence;
- commercial pressure;
- external organisations

to improperly influence research, education or professional decisions.

4.3 Objectivity

Decisions shall be based upon:

- evidence;
- facts;
- professional expertise;
- impartial assessment;
- scientific reasoning.

Personal opinions shall never be presented as established facts.



4.4 Accountability

Every individual is accountable for:

- decisions made;
- work performed;
- resources used;
- information provided;
- commitments undertaken on behalf of the Company.

Errors shall be acknowledged openly and corrected promptly.

4.5 Transparency

Where appropriate, Company activities shall be conducted openly.

Transparency strengthens:

- public confidence;
- academic credibility;
- organisational integrity;
- stakeholder trust.

Confidential information shall nevertheless remain protected.

4.6 Respect for Human Dignity

Every individual shall be treated fairly and respectfully.

The Company rejects all forms of:

- discrimination;
- harassment;
- bullying;
- intimidation;
- victimisation;
- abusive behaviour.

Respect extends to colleagues, students, researchers, partners, suppliers, clients and members of the public.



4.7 Social Responsibility

The Company recognises its wider responsibility towards society.

Activities undertaken by Surkovsky Centre Ltd should contribute positively to:

- education;
 - scientific progress;
 - professional development;
 - innovation;
 - public understanding;
 - sustainable development.
-

4.8 Ethical Leadership

Leadership within Surkovsky Centre Ltd requires more than managerial authority.

Leaders are expected to:

- demonstrate ethical behaviour;
- encourage openness;
- support professional development;
- make fair decisions;
- resolve conflicts responsibly;
- promote accountability throughout the organisation.

Ethical leadership shall be measured by conduct rather than position.

5. Professional Conduct

Professional behaviour is essential for maintaining the reputation and credibility of Surkovsky Centre Ltd.

Every representative of the Company shall perform their duties with competence, diligence and respect for others.

Professional conduct extends to all forms of communication, decision-making and representation of the Company.

5.1 Standards of Behaviour

Individuals acting on behalf of the Company shall:

- act honestly and professionally at all times;



- demonstrate courtesy and respect;
 - communicate clearly and accurately;
 - honour professional commitments;
 - exercise sound judgement;
 - avoid behaviour that could damage the reputation of the Company;
 - maintain appropriate professional boundaries.
-

5.2 Professional Competence

Individuals are expected to:

- maintain appropriate qualifications;
- continually develop their professional knowledge;
- participate in relevant continuing professional development;
- perform duties only within their areas of competence.

Where specialist expertise is required, appropriate advice shall be obtained.

5.3 Respectful Communication

Communication shall always be:

- professional;
- respectful;
- factual;
- constructive;
- inclusive.

The Company does not tolerate abusive, offensive, discriminatory or threatening language in any form of communication.

5.4 Professional Appearance and Representation

Employees and representatives shall present themselves in a manner appropriate to the circumstances and consistent with the reputation of Surkovsky Centre Ltd.

When representing the Company publicly, individuals shall ensure that their conduct reflects the professionalism, integrity and values of the organisation.

6. Academic and Scientific Integrity



6.1 Principle

Academic and scientific integrity forms the foundation of all educational, research and publishing activities undertaken by Surkovsky Centre Ltd.

The Company is committed to producing knowledge that is reliable, objective, transparent and capable of independent verification.

Every employee, researcher, lecturer and collaborator is personally responsible for maintaining the highest standards of academic and scientific integrity.

6.2 Scientific Independence

Research conducted under the name of Surkovsky Centre Ltd shall remain independent of improper political, commercial or personal influence.

Research outcomes shall never be altered, suppressed or manipulated to satisfy:

- financial interests;
- political agendas;
- institutional pressure;
- commercial expectations;
- personal preferences.

Scientific conclusions shall always reflect the evidence obtained through appropriate research methods.

6.3 Research Integrity

Researchers shall conduct all research honestly, responsibly and transparently.

They shall:

- follow recognised scientific methodologies;
- maintain accurate research records;
- report findings objectively;
- acknowledge research limitations;
- distinguish clearly between evidence and personal opinion;
- preserve the integrity of research data.

Research shall always be capable of independent scrutiny and verification where appropriate.

6.4 Research Ethics



All research involving individuals, organisations or sensitive information shall be conducted ethically.

Researchers shall:

- respect human dignity;
- protect participants' rights;
- obtain informed consent where required;
- minimise foreseeable risks;
- maintain confidentiality;
- comply with applicable legal and ethical requirements.

Research shall never place participants at unnecessary risk.

6.5 Research Misconduct

The Company adopts a zero-tolerance approach towards research misconduct.

Research misconduct includes, but is not limited to:

- fabrication of data;
- falsification of results;
- selective reporting intended to mislead;
- plagiarism;
- inappropriate authorship;
- manipulation of citations;
- concealment of conflicts of interest;
- destruction or alteration of research records.

Any allegation of research misconduct shall be investigated fairly, confidentially and without unnecessary delay.

6.6 Data Integrity

Research data represent an important institutional asset.

Researchers shall ensure that data are:

- accurate;
- complete;
- traceable;



- securely stored;
- retained in accordance with applicable legal and organisational requirements.

No individual shall intentionally manipulate, destroy or misrepresent research data.

6.7 Publication Ethics

The Company is committed to responsible scholarly publishing.

All publications produced under the name of Surkovsky Centre Ltd shall:

- present truthful findings;
- acknowledge contributors appropriately;
- disclose relevant conflicts of interest;
- identify sources accurately;
- comply with recognised publication standards.

Duplicate publication, plagiarism and misleading publication practices are prohibited.

6.8 Authorship

Authorship shall reflect genuine intellectual contribution.

Individuals shall not be listed as authors unless they have made a substantial contribution to:

- conception;
- methodology;
- research;
- analysis;
- interpretation;
- writing;
- critical revision.

Honorary or guest authorship is inconsistent with the ethical standards of the Company.

6.9 Peer Review

Where peer review forms part of Company activities, reviewers shall:

- act objectively;
- maintain confidentiality;



- avoid conflicts of interest;
- provide constructive feedback;
- respect intellectual property.

Peer review shall contribute to academic quality rather than personal criticism.

7. Education and Learning Standards

7.1 Educational Mission

Education provided by Surkovsky Centre Ltd shall promote knowledge, critical thinking, professional competence and ethical responsibility.

Learning activities shall encourage intellectual curiosity, independent reasoning and lifelong learning.

7.2 Learner-Centred Approach

Educational activities shall recognise the dignity, diversity and individual needs of learners.

Every participant shall be treated fairly and respectfully regardless of:

- nationality;
 - age;
 - gender;
 - disability;
 - religion;
 - language;
 - cultural background;
 - previous educational experience.
-

7.3 Teaching Standards

Lecturers, trainers and instructors shall:

- prepare thoroughly;
- deliver accurate and evidence-based information;
- encourage discussion;
- support independent learning;
- promote academic honesty;



- maintain professional boundaries.

Educational content shall be regularly reviewed to ensure relevance and quality.

7.4 Fair Assessment

Assessment shall be:

- objective;
- transparent;
- consistent;
- evidence-based;
- free from discrimination.

Learners shall receive clear information regarding assessment criteria.

7.5 Academic Freedom

The Company recognises academic freedom as an essential principle of education and research.

Academic freedom includes the responsible exchange of ideas, critical discussion and scholarly debate.

Academic freedom does not justify:

- discrimination;
 - harassment;
 - dissemination of knowingly false information;
 - unethical behaviour;
 - unlawful conduct.
-

7.6 Continuing Professional Development

The Company encourages every employee and associate to engage in continuous professional development.

Professional learning may include:

- further education;
- conferences;
- workshops;
- research activities;



- professional certifications;
- publication of scholarly work.

Continuous improvement is considered a professional responsibility.

8. Equality, Diversity and Inclusion

Surkovsky Centre Ltd is committed to maintaining an inclusive environment where every individual is treated fairly, respectfully and without discrimination.

The Company values diversity as a source of innovation, creativity and academic excellence.

Equal opportunities shall apply throughout recruitment, employment, education, promotion, research participation and professional development.

Discrimination based upon age, disability, race, nationality, ethnic origin, religion or belief, sex, sexual orientation, gender reassignment, pregnancy, maternity, marital status or any other protected characteristic is strictly prohibited.

Bullying, harassment, victimisation and abusive behaviour will not be tolerated under any circumstances.

All representatives of the Company share responsibility for promoting a culture of dignity, inclusion and mutual respect.

9. International Cooperation

9.1 Commitment

Surkovsky Centre Ltd recognises international cooperation as a fundamental element of education, scientific research, innovation and professional development.

The Company actively promotes collaboration with universities, research institutions, public authorities, professional organisations, non-governmental organisations and industry partners throughout the world.

International partnerships shall be established on the principles of mutual respect, academic freedom, transparency and shared responsibility.

9.2 Professional Relationships

All representatives of the Company shall maintain professional relationships characterised by:

- mutual respect;
- honesty;
- openness;
- cultural sensitivity;



- impartiality;
- professionalism.

The Company shall not tolerate behaviour that may damage long-term international partnerships or undermine confidence in the organisation.

9.3 Cultural Respect

Surkovsky Centre Ltd values cultural diversity.

Employees and representatives shall respect:

- national traditions;
- cultural differences;
- languages;
- religious beliefs;
- social customs;
- local legislation.

International cooperation shall always be conducted in a manner that promotes dignity and mutual understanding.

9.4 International Representation

Individuals representing the Company abroad shall act as ambassadors of Surkovsky Centre Ltd.

Their conduct shall demonstrate:

- professionalism;
- competence;
- integrity;
- courtesy;
- respect for local customs;
- commitment to academic excellence.

Personal behaviour shall never compromise the reputation of the Company.

9.5 International Projects

The Company shall ensure that international projects are managed responsibly through:

- transparent governance;



- responsible financial management;
 - ethical research;
 - effective communication;
 - quality assurance;
 - appropriate risk management.
-

10. Artificial Intelligence and Digital Ethics

10.1 Responsible Innovation

Surkovsky Centre Ltd recognises the transformative potential of Artificial Intelligence and emerging digital technologies in education, research and professional practice.

Innovation shall always be accompanied by ethical responsibility.

Technology exists to support human expertise, not replace professional judgement.

10.2 Principles for Responsible AI

Artificial Intelligence shall be used in accordance with the following principles:

- transparency;
 - accountability;
 - fairness;
 - human oversight;
 - data integrity;
 - security;
 - legality;
 - respect for intellectual property.
-

10.3 Human Responsibility

Final responsibility for any decision remains with the individual using AI-assisted tools.

AI-generated outputs shall never be accepted without appropriate professional review.

Users shall critically evaluate:

- accuracy;
- reliability;
- completeness;



- potential bias;
 - ethical implications.
-

10.4 Research and AI

Researchers using Artificial Intelligence shall clearly distinguish between:

- original scientific work;
- automated analytical support;
- AI-generated content.

AI shall never be used to fabricate research findings or misrepresent scientific evidence.

10.5 Education and AI

Educational use of AI shall promote learning rather than academic misconduct.

Learners shall be encouraged to develop:

- independent thinking;
 - critical analysis;
 - ethical decision-making;
 - responsible digital literacy.
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10.6 Cyber Responsibility

Every representative of the Company shall contribute to maintaining a secure digital environment.

This includes:

- protecting passwords;
 - safeguarding electronic devices;
 - recognising cyber threats;
 - reporting suspected security incidents promptly.
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11. Confidentiality and Information Governance

11.1 Confidential Information

Confidential information includes all non-public information relating to:

- research;



- education;
- finance;
- contracts;
- intellectual property;
- strategic planning;
- commercial activities;
- employees;
- students;
- partners.

Confidential information shall only be accessed by authorised persons.

11.2 Information Security

Information shall be protected against:

- unauthorised access;
- alteration;
- destruction;
- loss;
- theft;
- accidental disclosure.

Appropriate technical and organisational safeguards shall be maintained.

11.3 Personal Data

Personal data shall be processed:

- lawfully;
- fairly;
- transparently;
- securely;
- only for legitimate purposes.

The Company is committed to complying with all applicable UK data protection legislation.



11.4 Records Management

Official Company records shall be:

- accurate;
- complete;
- reliable;
- securely maintained;
- retained in accordance with legal and organisational requirements.

No record shall be intentionally altered or destroyed without proper authority.

11.5 Intellectual Property

Intellectual property created through Company activities shall be respected and protected.

Employees shall respect:

- copyright;
- patents;
- trademarks;
- confidential know-how;
- research outputs;
- educational materials.

Unauthorised use of intellectual property belonging to others is prohibited.

12. Corporate Governance

12.1 Governance Principles

Corporate governance within Surkovsky Centre Ltd shall be based upon:

- integrity;
- accountability;
- transparency;
- lawful decision-making;
- responsible stewardship.

Governance arrangements shall support the long-term sustainability of the Company.



12.2 Conflict of Interest

Individuals shall avoid situations where personal interests could influence professional judgement.

Potential conflicts shall be declared promptly.

Appropriate mitigation measures shall be implemented before decisions are made.

12.3 Anti-Bribery and Corruption

The Company operates a zero-tolerance policy towards:

- bribery;
- corruption;
- fraud;
- improper payments;
- facilitation payments;
- financial misconduct.

No representative of the Company shall offer, request or accept any improper benefit.

12.4 Gifts and Hospitality

Business hospitality may only be accepted where it is:

- lawful;
- reasonable;
- transparent;
- proportionate;
- incapable of influencing professional judgement.

Excessive gifts shall not be accepted.

12.5 Responsible Decision-Making

Company decisions shall be:

- evidence-based;
- objective;
- transparent;
- proportionate;



- properly documented.

Decision-makers shall always act in the best interests of Surkovsky Centre Ltd rather than personal interests.

12.6 Protection of Reputation

The reputation of Surkovsky Centre Ltd is one of its most valuable assets.

Every representative of the Company has a personal responsibility to protect:

- the credibility of the organisation;
- public confidence;
- academic reputation;
- professional standing;
- relationships with stakeholders.

Actions capable of bringing the Company into disrepute shall be regarded as serious misconduct.

13. Financial Integrity

13.1 Principle

Surkovsky Centre Ltd is committed to maintaining the highest standards of financial integrity, accountability and responsible stewardship of all financial and material resources entrusted to the Company.

Every financial decision shall support the Company's mission, protect its long-term sustainability and comply with applicable legal, regulatory and contractual obligations.

13.2 Responsible Management of Resources

All employees and representatives shall ensure that Company resources are used:

- efficiently;
- economically;
- responsibly;
- exclusively for legitimate Company purposes.

Waste, negligence and misuse of Company resources are inconsistent with the values of Surkovsky Centre Ltd.

13.3 Financial Records



All financial records shall be:

- complete;
- accurate;
- truthful;
- verifiable;
- maintained in accordance with applicable legislation.

No financial transaction shall be intentionally concealed, altered or misrepresented.

13.4 Procurement

The procurement of goods and services shall be based upon:

- fairness;
- transparency;
- value for money;
- objective evaluation;
- ethical business practice.

Suppliers shall be selected without discrimination or improper influence.

13.5 Fraud Prevention

Every representative of the Company has a responsibility to prevent:

- fraud;
- theft;
- embezzlement;
- financial misconduct;
- misuse of Company assets.

Any suspected financial irregularity shall be reported immediately through the appropriate reporting procedures.

14. Publications and Intellectual Property

14.1 Commitment

Publications produced by Surkovsky Centre Ltd contribute to the advancement of knowledge and therefore must meet the highest academic and ethical standards.



The Company supports responsible publishing in books, journals, conference proceedings, reports, policy papers and educational materials.

14.2 Publication Standards

Every publication issued under the Company's name shall:

- be factually accurate;
- be evidence-based;
- acknowledge sources appropriately;
- respect copyright legislation;
- maintain academic objectivity;
- reflect professional editorial standards.

The Company rejects sensationalism, misinformation and academic misconduct.

14.3 Copyright

Surkovsky Centre Ltd respects intellectual property rights belonging to both the Company and third parties.

Employees shall not:

- reproduce copyrighted material without permission;
 - infringe licences;
 - misuse proprietary information;
 - publish confidential material without authorisation.
-

14.4 Authorship and Attribution

Proper credit shall always be given to individuals who have made a genuine intellectual contribution.

Ghost authorship, honorary authorship and misrepresentation of contributions are inconsistent with this Code.

14.5 Open Knowledge

Where appropriate, the Company supports responsible dissemination of knowledge for the benefit of education, research and society while respecting legal, contractual and commercial obligations.



15. Public Representation

15.1 General Principle

Every representative of Surkovsky Centre Ltd contributes to the public image of the organisation.

Professional conduct shall strengthen confidence in the Company's integrity, competence and independence.

15.2 Representation

When acting on behalf of the Company, individuals shall:

- behave professionally;
 - communicate accurately;
 - avoid misleading statements;
 - distinguish personal opinions from official Company positions;
 - maintain appropriate standards of appearance and behaviour.
-

15.3 Conferences and Public Events

Employees representing the Company at conferences, seminars, workshops or public events shall:

- demonstrate professional competence;
- respect differing viewpoints;
- present information accurately;
- acknowledge sources appropriately;
- promote constructive dialogue.

Professional disagreement shall always remain respectful.

15.4 Media Relations

Only authorised representatives may issue official statements to:

- journalists;
- broadcasters;
- publishers;
- government bodies;
- public authorities.



Unauthorised public statements may damage the Company's reputation and should therefore be avoided.

15.5 Social Media

Representatives shall use social media responsibly.

They shall not:

- disclose confidential information;
- publish misleading information;
- engage in abusive communication;
- present personal opinions as official Company policy.

Online conduct should reflect the same professional standards expected in the workplace.

15.6 Protection of the Company's Reputation

The reputation of Surkovsky Centre Ltd is built upon trust earned through professional conduct and academic excellence.

Every individual shall actively protect the Company's:

- name;
- reputation;
- credibility;
- independence;
- professional standing.

Conduct likely to damage public confidence in the Company shall be regarded as a serious breach of this Code.

16. Health, Safety and Wellbeing

16.1 Commitment

Surkovsky Centre Ltd is committed to providing a safe, healthy and supportive environment for employees, students, researchers, visitors and all other persons participating in Company activities.

Health and safety are shared responsibilities.

16.2 Individual Responsibilities



Every individual shall:

- work safely;
- comply with health and safety requirements;
- report hazards promptly;
- cooperate during emergency situations;
- protect the wellbeing of colleagues and visitors.

16.3 Wellbeing

The Company recognises that employee wellbeing contributes directly to organisational success.

Surkovsky Centre Ltd supports:

- respectful working relationships;
- professional development;
- work-life balance;
- psychological wellbeing;
- an inclusive organisational culture.

A healthy working environment promotes creativity, innovation and academic excellence.

17. Reporting Misconduct

17.1 Commitment to Ethical Reporting

Surkovsky Centre Ltd encourages an organisational culture in which concerns may be raised openly, responsibly and without fear of retaliation.

Every individual has both the right and the professional responsibility to report conduct that may:

- violate this Code;
- breach Company Policies;
- contravene legal or regulatory requirements;
- threaten the integrity or reputation of the Company;
- compromise the safety or wellbeing of others.

Early reporting enables the Company to address concerns promptly, fairly and effectively.

17.2 Matters That Should Be Reported



Concerns that should be reported include, but are not limited to:

- fraud;
- corruption;
- bribery;
- financial misconduct;
- conflicts of interest;
- research misconduct;
- plagiarism;
- falsification or fabrication of data;
- discrimination;
- harassment;
- bullying;
- breaches of confidentiality;
- misuse of Company assets;
- cyber security incidents;
- violations of health and safety requirements;
- unlawful conduct;
- serious breaches of Company Policies or Procedures.

17.3 Reporting Procedure

Concerns should normally be reported through one of the following channels:

- the immediate line manager;
- the Director;
- the designated Compliance Officer;
- the Company's confidential reporting procedure, where applicable.

Reports should be made as soon as reasonably practicable and include all relevant information available at the time.

Individuals are encouraged to provide factual information and avoid speculation.

17.4 Confidentiality

All reports shall be handled with appropriate confidentiality.



Information relating to an investigation shall only be disclosed to those who have a legitimate need to know.

The Company will make every reasonable effort to protect the identity of individuals making reports in good faith, subject to legal obligations.

17.5 Protection Against Retaliation

Surkovsky Centre Ltd strictly prohibits retaliation against any individual who reports a genuine concern in good faith.

Retaliation includes:

- dismissal;
- intimidation;
- harassment;
- discrimination;
- threats;
- victimisation;
- any disadvantage arising from making a protected report.

Any act of retaliation shall itself constitute a serious breach of this Code.

17.6 Investigation

All reported concerns shall be assessed objectively, impartially and without unnecessary delay.

Investigations shall be conducted:

- fairly;
- independently;
- confidentially;
- proportionately;
- in accordance with applicable law and Company procedures.

Individuals involved in an investigation are expected to cooperate fully and honestly.

18. Compliance and Enforcement

18.1 Obligation to Comply

Compliance with this Code of Conduct is mandatory for every person acting on behalf of Surkovsky Centre Ltd.



Ignorance of this Code shall not exempt any individual from responsibility.

18.2 Individual Responsibility

Every representative of the Company shall:

- read and understand this Code;
- comply with its requirements;
- seek guidance where uncertainty exists;
- promote ethical behaviour;
- lead by personal example where appropriate.

Managers and senior personnel are expected to demonstrate the highest standards of ethical leadership.

18.3 Breaches of the Code

Failure to comply with this Code may result in appropriate action, including:

- informal resolution;
- additional training;
- written warning;
- disciplinary proceedings;
- termination of employment or contractual relationship;
- recovery of losses where appropriate;
- referral to professional or regulatory bodies;
- notification of law enforcement authorities where required.

The nature of any action shall be proportionate to the seriousness of the breach.

18.4 Continuous Improvement

Ethical governance requires continuous improvement.

The Company shall regularly evaluate:

- organisational culture;
- governance arrangements;
- ethical risks;
- compliance processes;



- staff awareness;
- effectiveness of this Code.

Lessons learned from investigations, audits and organisational experience shall be used to strengthen future governance.

19. Monitoring and Review

This Code shall be monitored to ensure its continuing effectiveness.

The Director is responsible for ensuring that the document remains:

- legally compliant;
- operationally effective;
- consistent with the Company's strategic objectives;
- aligned with recognised standards of good governance.

This Code shall normally be reviewed:

- annually;
- following significant legislative changes;
- following major organisational changes;
- following significant governance or compliance issues.

Revised versions shall supersede previous editions and shall be communicated to all relevant persons.

20. Final Provisions

This Code of Conduct forms part of the corporate governance framework of Surkovsky Centre Ltd.

It establishes the minimum standards of ethical and professional behaviour expected from every individual acting on behalf of the Company.

Nothing within this Code limits any obligation arising under:

- applicable legislation;
- employment contracts;
- consultancy agreements;
- Company Policies;
- Company Procedures;
- regulatory requirements.



Where higher professional or legal standards apply, those standards shall prevail.

Every representative of Surkovsky Centre Ltd is expected to uphold not only the letter of this Code but also its spirit, demonstrating integrity, professionalism, academic excellence and respect in every aspect of their work.

Related Company Documents

This Code should be read in conjunction with, where applicable:

- Articles of Association
- Academic Integrity Policy
- Research Ethics Policy
- Equality, Diversity and Inclusion Policy
- Data Protection Policy
- Information Security Policy
- Anti-Bribery and Corruption Policy
- Whistleblowing Policy
- Health and Safety Policy
- Quality Assurance Policy
- Complaints Procedure
- Recruitment Policy
- Safeguarding Policy
- Risk Management Policy

Approval

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1.0	1 August 2026	Initial issue	Director

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