



**Aim:**

This document defines the Code of Ethics and Anti-Discrimination policy that is expected to be followed within MUC. The aim is to provide the necessary guidance to ensure a safe and welcoming learning environment for all staff, trainers and students.

**Scope:**

The Code of Ethics and Anti-Discrimination policy applies to all company personnel, including all trainers, participating in activities within MUC.

**Reason for Revision:**

- The reference in all sections has been changed from Malta University Training Services (MUTS) to Malta University Consulting (MUC) (26/04/23)
- The Author and Approver Signatures have been removed and replaced due to a change in staff, to reflect current organisational set up. These have been replaced by the following signatories: Ms Victoria Vella (Head of Training) and Ing. Mark Farrugia (Manager Consultancy & Training Services) (23/08/23)
- The SOP was reviewed by the Head of Training, Manager, and Training & Consultancy Executive to ensure that its content aligns with current practices and guidelines (27/05/26)

**Detail:**

**Code of Ethics**

We base our business code of ethics on common ethical principles:

- Respect for others: Treat people as you want to be treated.
- Integrity and honesty: Tell the truth and avoid any wrongdoing to the best of your ability.
- Conflict of Interest: Avoid situations that can result in a conflict of interest. If such a situation occurs, advise your superior accordingly and refrain from involvement in related decision-making.
- Justice: Make sure you're objective and fair and don't disadvantage others.
- Lawfulness: Know and follow the law – always.
- Competence and accountability: Work hard and be responsible for your work. Keep yourself up to date.



- Teamwork: Collaborate and ask for help.

A more detailed overview of our code:

1. Respect for others

It's mandatory to respect everyone you interact with. Be kind, polite and understanding. You must respect others' personal space, opinions and privacy. Any kind of violence is strictly prohibited and will result in immediate disciplinary proceedings. The harassment or victimisation of others is strictly prohibited.

What constitutes harassment or victimization? As a general rule, try to put yourself in someone else's place. How would you feel if someone behaved in a specific way to you? If the answer is "I wouldn't like it much" or "I would never let them behave like that to me", then we don't tolerate this behaviour no matter the person it comes from.

If anyone, be it customer, colleague or any other stakeholder, is offensive, demeaning or threatening toward you or someone you know, report them immediately to your manager. You can also report rudeness and dismissiveness if they become excessive or frequent.

2. Integrity and honesty

Employees are expected to conduct themselves in a manner that supports and advances MUC's mission, values, and objectives. Every individual contributes to the achievement of our organizational and financial goals, and professional conduct should reflect a commitment to these shared outcomes.

Integrity, honesty, and transparency are fundamental expectations. Employees must act in good faith and deal fairly with colleagues, customers, suppliers, and other stakeholders. Conduct that is dishonest, deceptive, malicious, or intended to mislead others is inconsistent with our values and may result in disciplinary action.

MUC maintains a zero-tolerance approach to theft, fraud, misappropriation of assets, or any other form of unlawful or unethical conduct involving MUC property, funds, information, or the property of others. Any employee found to have engaged in such conduct will be subject to disciplinary action, which may include termination of employment and referral to the appropriate authorities where warranted.

3. Conflict of interest

Conflict of interest may occur whenever your interest in a particular subject leads you to actions, activities or relationships that damage the reputation or undermine MUC. This includes situations



like using your position's authority for your own financial or ideological personal gain or exploiting MUC resources to support a personal money-making business. Employees must avoid actual, potential, or perceived conflicts of interest and disclose any such situations promptly.

Where a conflict of interest is intentional or knowingly undisclosed, disciplinary action, up to and including termination of employment, may result. If a conflict arises unintentionally, MUC will work with the employee to resolve the situation. Repeated occurrences or failure to cooperate with corrective measures may lead to further disciplinary action, including termination.

#### 4. Justice

Employees must not take advantage of others, their work, or their mistakes. Everyone should be treated fairly and given equal opportunity, and employees are expected to raise concerns when they observe unfair treatment.

Decisions that affect others must be made objectively and be supported by clear rationale and, where appropriate, documented evidence. Consistent and structured approaches should be used wherever possible; for example, standardized questions should be used when interviewing candidates.

Those in positions of authority must act impartially and avoid any form of favouritism. Recognition, rewards, and feedback should be based on clear, transparent criteria. Employees must also act fairly in their dealings with customers and suppliers. Where errors or disputes arise, employees should not attempt to conceal issues or unfairly assign blame. Instead, they should escalate the matter to a manager to identify a constructive and balanced resolution.

#### 5. Lawfulness

Employees are required to comply with all applicable laws and regulations relevant to MUC and their role. Certain positions may be subject to additional legal or professional obligations, which employees are expected to understand and follow.

Any contracts, legal clauses, disclaimers, consent forms, or other materials that may have legal implications must be reviewed and approved by legal counsel prior to finalization.

Employees must also adhere to MUC's confidentiality and data protection policies, including all applicable GDPR requirements, and must not disclose or misuse any confidential information relating to customers, employees, stakeholders, or MUC operations.

Compliance with laws relating to fraud, bribery, corruption, and violence is mandatory. Where there is uncertainty regarding legal requirements in any situation, employees are expected to seek guidance before proceeding.



6. Competence and accountability

A level of effort and discretionary behaviour is expected from all employees. All employees are responsible for the organization's success, and a clear lack of engagement affects others' work experience and productivity. Incomplete or slow working might hinder other people's work or cause them to have to shoulder the burden themselves. This comes in direct conflict with our principles of respect and integrity.

Staff is expected to take up opportunities for learning and development, either on-the-job or via educational material or training. Each department manager is available to discuss opportunities for training and growth.

It is imperative that staff take responsibility for their actions. Everyone makes mistakes or needs to make tough decisions, and it is important to own up if/when a situation arises. Regularly failing to take accountability especially in significant situations which can cause harm to MUC and its reputation (e.g. a crucial mistake) will result in disciplinary action. This can be mitigated if a person takes responsibility and offers a solution to mitigate the risk or solve the issue.

7. Teamwork

Collaboration is a valued strength, not merely a workplace expectation. Each staff member is encouraged to work autonomously, whilst working closely with colleagues, supporting when necessary and contributing to shared objectives.

Be generous in sharing your expertise and knowledge and remain open to learning from others around you. Meaningful collaboration fosters innovation, strengthens decision-making and drives better outcomes.

**Anti-Discrimination Policy**

Discrimination is defined as any negative action or attitude directed toward someone because of protected characteristics, such as race and gender. Other protected characteristics are:

- Age
- Religion
- Ethnicity/ nationality
- Disability/ medical history
- Relationship status
- Pregnancy/ maternity/ paternity
- Gender identity/ sexual orientation



## 1. Discrimination and harassment

MUC's anti-discrimination and anti-harassment policies go hand-in-hand. Any kind of discrimination that creates a hostile and unpleasant environment for employees, interns or clients will not be tolerated.

Any employee found to have engaged in the harassment of a colleague will be subject to MUC's disciplinary procedures. All incidents, investigations, and resulting disciplinary actions will be documented and retained in the employee's personnel file in accordance with MUC policies and applicable legal requirements.

MUC recognizes that sometimes discrimination is unintentional and that unconscious biases can influence behaviour and decision-making. Identifying and addressing such biases can be challenging, and we are committed to supporting employees in developing greater awareness and fostering an inclusive workplace.

Where an employee is found to have engaged in discriminatory conduct arising from unconscious bias, MUC will provide appropriate support, including training, coaching, and counselling, and will implement measures designed to reduce the impact of such biases, as outlined in the following section. Employees are expected to actively participate in these efforts and demonstrate a commitment to improving their behaviour..

However, where an employee is unwilling to acknowledge concerns, engage with corrective measures, or make reasonable efforts to change their behaviour, MUC may take disciplinary action, which may include reassignment, demotion, or termination of employment, depending on the circumstances.

MUC maintains a zero-tolerance approach to assault, sexual harassment, and workplace violence, whether physical, verbal, psychological, or otherwise. Such conduct is considered gross misconduct and will be treated with the utmost seriousness. Any employee, including managers, supervisors, trainers, or other representatives of MUC, who is found, following a fair investigation and due process, to have engaged in such behaviour may be subject to immediate dismissal, in accordance with applicable laws and MUC procedures.

MUC also reserves the right to refer any such matter to the appropriate authorities, including law enforcement agencies, where the circumstances warrant further investigation or legal action.

## 2. Actions to prevent discrimination

- Inclusive language must be used in any job ads
- Compensation and benefits must be offered in accordance to position, seniority, qualifications and performance, not protected characteristics.



- Accommodations must be made for those with disabilities.
- Managers must be required to keep detailed records of their decisions concerning current team members and potential job candidates.

**In cases of discrimination:**

If you experience discriminatory behaviour, or suspect that discrimination is occurring, you should report to your manager as soon as possible. Management is responsible for reviewing concerns, conducting an appropriate investigation, and determining any necessary action in accordance with MUC policy.

Disciplinary action for discriminatory behaviour will depend on the nature and severity of the conduct. For example, unintentional conduct that causes offence may result in corrective feedback or a formal reprimand. In contrast, deliberate discrimination will be treated as a serious matter and may result in significant disciplinary action.

***If you raise a concern or make a report to a regulatory authority, MUC is committed to complying with applicable laws prohibiting retaliation, and will not take any adverse action against you for doing so.***

All employees are expected to actively support the prevention and addressing of discrimination. This includes reflecting on potential unconscious bias and reporting any instances of discrimination affecting themselves or others. Employees are also encouraged to share suggestions for improving fairness, equality, and inclusion within the workplace.