

CODE OF CONDUCT

Introduction

Tigers Childcare, as a leading childcare provider, insist on upholding the highest standards and ethics at every level of our business. We are committed to always acting with integrity and honesty, to maintain and protect our reputation.

Tigers Childcare is a company with a strong set of values and a clear purpose. We strive to improve the lives of children and families through the provision of high-quality education and care. Because of the trust that families give to Tigers Childcare, it is our shared responsibility to be worthy of this trust by being irreproachable on a daily basis in matters of honesty, integrity, and ethics.

Our Code of Conduct sets out the expectations and behaviours expected from all colleagues at Tigers Childcare and is closely linked to our Core Values.

The principles set out in this Code of Conduct are not exhaustive but set out a minimum standard of behaviour which is expected. It does not matter where you work or what your role is, we all have a responsibility to use good judgement, follow our code and always do the right thing.

Scope

Our Code of Conduct applies to all Tigers Childcare colleagues, in all locations, including directors, board members and investors.

Code of Conduct

Respect in the Workplace

We encourage collaboration across all locations and business functions. We are transparent and openly communicate with each other. Trust is key to this collaboration. Trust begins with each of us treating each other with care, courtesy, dignity, fairness and respect. We:

- do not tolerate any form of harassment, bullying, retaliation or intimidation;
- do not discriminate on the grounds of age, race, ethnicity, gender, sexual orientation, gender, gender identity or expression, religion, disability, medical condition or any other characteristics protected by law.

These behaviours undermine the integrity of our relationships.

We respect and encourage open dialogue, to create a climate for open and honest discussions.

Professional Responsibilities in the Workplace

We are all expected to act professionally and show integrity in the workplace. We must:

• strive to provide exceptional service to achieve our mission of delivering highquality education and care to our families;

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- aim to continuously improve the care and support of our children through on-going professional development;
- Model quality practice;
- Acknowledge and support the diverse strengths and experiences of colleagues to:
 - o build shared professional knowledge, understanding, skills and attitudes;
 - build a spirit of collegiality and professionalism through collaborative relationships, and team work based on trust, respect and honesty;
 - collaborate with colleagues to generate a culture of continual reflection and renewal of best practices in early childhood education and care;
- Use constructive processes to address differences of opinion and to negotiate shared perspectives and actions;
- comply with all relevant internal policies and applicable laws to protect the health and safety of everyone we work with and care for;
- be friendly and collaborative at work and communicate in an open and effective way to create a positive workplace environment and to promote the health, safety and wellbeing of those with.
- We are thoughtful in our communications, online and offline.

Professional Responsibilities Relating to Parents and Families

Parents and families have the most active role, and the greatest responsibility, in shaping their child's development.

In relation to parents and families we will:

- Support parents as children's first and most important educator;
- Respect parents' and families' right to make decisions about their child;
- Work collaboratively with parents and families and, engage in shared decision making as necessary, to support children's learning, development, health and wellbeing;
- Develop respectful relationships with parents and families, based upon open communication to encourage family engagement and build a strong sense of belonging;
- Learn about, respect and respond to the uniqueness of each family, their circumstances, culture, family structure, customs, language, and beliefs;
- In keeping with the requirements of the GDPR, and this code of professional responsibilities we will:
 - Respect each family's right to privacy and safeguard information about parents/families, particularly when shared on digital platforms;
 - Ensure that the nature and limits of the privacy inherent in their relationship are clearly understood and applied;
 - Speak respectfully to and about families with colleagues and/or other professionals;
- Be sensitive to the vulnerabilities of children and families at all times and respond in ways that empower and maintain their dignity;
- Facilitate and encourage parental involvement and engagement in early learning in ECEC settings;
- Ensure that no practices carried out are disrespectful, degrading, exploitative, intimidating, emotionally or physically harmful or neglectful in respect of any parent or family.



Professional Responsibilities Relating to Communities

In relation to communities, we will:

- Learn about the community in which we work, and develop and implement early childhood curricula that are responsive to those contexts and community priorities;
- Connect with the services and agencies in the community that support children and families;
- Provide parents and families using our service with full information, including access to records pertaining to work on their behalf (taking account of the rights of others);
- Acknowledge the connectedness of local, national and global communities of children and families to promote shared aspirations for all children's health, wellbeing, safety, welfare and early education;
- Advocate for the development and implementation of legislation/policy that promotes child friendly communities, and work to change those that impede child and family well-being;
- Use knowledge and research to advocate for universal access to quality early childhood education and care services for all children;
- Work to promote community understanding of how young children learn so that appropriate systems of assessment and reporting are used to benefit children;
- In keeping with the requirements of the GDPR and this code of professional responsibilities, we will resist any action that diminishes the good standing of the community.

Professional Responsibilities Relating to the Early Childhood Education and Care Profession

In relation to our profession, we will:

- Present a positive demeanour including professional dress, good attendance, and time keeping;
- Advocate for our profession and the provision of quality early childhood education and care;
- Engage in critical reflection, and ongoing professional learning;
- Be pro-active in remaining up to date with research, changes in legislation and policy, and take personal responsibility for our ongoing professional development and learning;
- Act with responsibility, accountability and integrity at all times;
- Value training and professional qualifications, and participate in continuous professional development; including the development of language and communication skills appropriate to the needs of children in our setting;
- Base our work on research, theory, content knowledge, practice-evidence and understanding of the children and families with whom we work;
- Articulate our professional values, knowledge and practice, as well as, the positive contribution our profession makes to society;
- In keeping with the requirements of the GDPR and this code of professional responsibilities, we will:
 - Engage in respectful communication at all times;
 - Resist any action that diminishes the good standing of our profession. This includes/extends to the use of social media (i.e., Facebook, Instagram, TikTok etc.).



Professional Responsibilities relating to Social Media

Colleagues must conduct themselves professionally and respectfully on social media, as their behaviour can reflect on the company. We must:

- not share confidential or proprietary information about the company, children, families, or colleagues on social media;
- not post inappropriate content. Posts should be appropriate, respectful, and free of offensive language, discriminatory remarks, or any content that could harm the company's reputation;
- make it clear that views are our own and not necessarily those of the company. Use disclaimers such as "opinions are my own.";
- avoid discussing sensitive company-related topics such as financial performance, internal projects, or child/family details;
- engage with colleagues, customers, and the public in a respectful and nonconfrontational manner;
- not use social media to harass, bully, or discriminate against anyone, including colleagues, children/families, or competitors;
- resolve issues through appropriate company channels, not on social media;
- not speak on behalf of the company on social media unless expressly authorised to do so.

Protection of Tigers Childcare Assets

We will treat property belonging to Tigers Childcare, and the property of the children, suppliers and other business partners, whether material or intangible, with respect and care. We must:

- not misuse any company property, in particular:
 - o for a non-business-related activity or for personal gain; or
 - o Illegal or unethical activity
- seek permission before using company property for personal use, and only seek that permission where the use will be legal and ethical and will not interfere with your role at Tigers Childcare;
- protect company property and equipment from damage and vandalism, whenever possible. We do not lend, sell or give equipment away unless we have the express permission to do so; and
- respect all intangible property. This includes branding, trademarks, copyright and other property (information, reports etc.), and we must remember that Tigers Childcare owns any work product (such as ideas, processes or procedures) that we develop and design in our role within the business.

Record Keeping

Where our role involves reporting, we will always act honestly and with integrity. We will always provide full, fair, accurate and understandable reports in a timely manner and be aware of the legal obligations of accurate reporting where applicable.

We will cooperate fully with any authorised internal or external investigation. We must never withhold information that raises ethical questions and/or information that should be brought to the attention of those more senior than us or that should be disclosed to applicable regulatory authorities.



Records must be maintained in accordance with relevant internal policies and in accordance with all applicable laws. We will not destroy or dispose of information that might be needed for an investigation, an audit or legal proceeding.

Acting Fairly, Legally and Ethically

"We are honest, open, ethical and fair. We speak up when our core values are not being respected"

1. Compliance with Laws & Policies

We respect the law and are committed to complying with all laws and regulations applicable to our business in every country in which we operate. We will not knowingly participate in any illegal or unethical activity and will follow this Code and all other policies that are applicable to our role at Tigers Childcare.

2. Whistleblowing

An important aspect of accountability and transparency is a mechanism to allow colleagues to voice concerns in a responsible and effective manner. It is a fundamental term of every contract of employment that colleagues will not disclose confidential information about Tigers Childcare. Nevertheless, where an individual discovers information which they believe shows serious malpractice or wrongdoing then this information should be disclosed internally without fear of reprisal, and there should be arrangements to enable this to be done independently of line management.

Our Whistleblowing Policy has been designed to encourage and enable colleagues to raise, rather than overlook, genuine concerns or disclose information related to potential wrongdoing. Refer to our *Whistleblowing Policy* for more information.

A concern / disclosure may be made anonymously via our <u>colleague intranet site</u> or our <u>reporting website</u>.

3. Conflicts of Interest

Whether in your professional or private life, none of your actions should conflict with your professional responsibilities within Tigers Childcare. The mere appearance of a conflict of interest could damage the reputation of the company, our colleague and business partners.

A conflict of interest exists when a personal interest interferes with the function performed within Tigers Childcare and such interference is likely to affect the correct performance of the duties performed on behalf of the company. Such conflicts may arise when an in a situation where a colleague's personal, social, financial or political interests alter their judgment by no longer objectively serving the interests of the company.

Examples of conflicts of interest include:

- Engaging in commercial transactions with a supplier or subcontractor on their own behalf or on behalf of third parties (family, friends, etc.)
- Investing directly or indirectly in the capital or debt of a supplier or subcontractor;
- Participating in the selection of a supplier when there is a conflict of interest;



• Holding a second job. If this is permitted by the employment contract with the company, this activity must always be authorised in advance by the line manager.

Conflicts of interest alter judgment. You must avoid any situation that creates or may create a conflict between your personal interests (or those of your family members) and those of the company.

All colleagues, as included under the scope of this policy, undertake to:

- Prioritise the company's interests by highlighting any personal, financial or family interest that could raise doubts as to their integrity;
- Inform their line managers and, where applicable, the Board as soon as possible and in writing, of potential or proven conflicts of interest
- Refrain from participating in the tasks and duties entrusted to them and likely to give rise to the conflict of interest, if any.

4. Fraud Prevention

All colleagues, as included under the scope of this policy, will refrain from committing any act that could constitute a form of fraud. Fraud includes deliberately deceiving others to obtain some sort of benefit, illegitimately or illegally, or to evade a contractual or legal obligation. In particular, the following is prohibited:

- Misappropriate sums, products or equipment belonging to the company for personal use or use other than that permitted by the company;
- Falsify any document, especially accounting, administrative or financial documents (e.g., financial statements or invoices);
- Make a false statement, whether mandatory or voluntary, to a private entity or public authority that requires it by law or contract;
- Destroy supporting documents.

5. Confidentiality and Data Privacy

We take our responsibility and obligations to only collect, use and process the personal information of the children we care for, their families, our colleagues and other relevant business partners for proper and legitimate purposes very seriously. Our ability to protect confidential information is critical to our ability to maintain trust. It doesn't matter it whether the information is received orally, on paper, in an email or in any other form.

- We respect the privacy and confidentiality of information of our families, our colleagues and others with whom we do business;
- We protect personal and other confidential information in all forms;
- We all play a role in protecting confidential information entrusted to us in its various forms;
- We will comply with all applicable data protection laws and regulations and follow all internal policies and procedures when working with personal information;
- We only use approved systems and applications in our work;
- We don't inappropriately divulge confidential information, including when using social media;
- We are cautious when discussing work-relate matters in public spaces;
- We take care to protect physical copies of confidential information; and



• We promptly identify any unintended disclosure of confidential information and escalate as appropriate and in line with internal policies.

6. Bribery and Corruption

We take a zero-tolerance approach to bribery and corruption across all jurisdictions in which we operate. We do not engage in or accept any form of bribery, collusive anticompetitive discussions, or arrangements. Refer to the *Anti-Bribery and Corruption Policy*.

7. Improper Gifts

One cannot give a gift, consideration or advantage to a person knowing that this will be used to facilitate an offence. However, this does not prohibit gifts of low value (below €100 in value) and normal and appropriate hospitality that are given in good faith rather than to secure an improper advantage.

This applies equally to the giving and the receiving of gifts. Any gifts to an individual which have a value more than €100 must be notified to the executive management team who will decide if it is appropriate to accept the gift.

We acknowledge that educators may receive gifts from families to show their appreciation. These gifts should be refused if they breach this Code or are excessive, with a value of $\leq 100 / \pm 100$ or more.

8. Fair Dealing

We will always compete fairly and ethically for business opportunities. We will not:

- make deals with competitors about who we compete, including arrangements on matters such a pricing;
- discuss or exchange information with competitors (or potential competitors) about topics such as pricing, costs, business plans or marketing strategies;
- seek information on our competitors in an unethical or unlawful way. Whilst seeking information about our competitors is normal business practice, we will do this properly, using public or other permitted sources; and
- make any false or misleading statements to win business.

Our Responsibilities under the Code

- We must read, understand and comply with the Code
- We are required to avoid any activity that might lead to, or suggest, a breach of this Code.
- We must notify our line manager or make a report in accordance with our Whistleblowing Policy if we believe or suspect that a conflict of this Code has occurred or will occur in the future.

Code of Conduct Breaches

We take compliance with this Code very seriously and failure to comply puts us and our business at risk. If we breach this Code, we should expect to face disciplinary action, which could result in dismissal for misconduct or gross misconduct.



We may also terminate our relationship with other individuals and organisations working on our behalf if they breach this code.

References

- 1. Code of Professional Responsibility and Code of Ethics for Early Years in the Department of Children and Youth Affairs (2021)
- 2. First 5 A Whole of Government Strategy for Babies, Young Children and Families (Gov. of Ireland, 2018).

Policy Review

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Policy Reviewed: Annually