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Compliance: Ethics Code

Regulations



History of document revisions

Version	Date	Summary of Changes	Author	Revised by	Approved by
1	02/2022	Information on the implementation of the new software to manage the institutional complaints channel is included.	People & Culture Technician	Compliance Committee	Board of Trustees Fundación Privada Universitaria EADA
0	12/2019	Initial draft	Compliance Committee	Director General	Board of Trustees Fundación Privada Universitaria EADA



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Introduction

Founded in Barcelona in 1957, EADA was established in 1985 as a Private University Foundation that bases its activity on training, research and the transfer of talent and knowledge to the business world.

For more than 60 years, EADA has maintained the foundations of independence, integrity, diversity, proximity, quality, innovation and respect that have characterized it. On these foundations, its Board of Trustees has guided the institution, ensuring its continuity and sustainability at all times.

In our day-to-day activity, compromising situations may arise that may be subject to ethical or even legal repercussions.

This code contains the minimum standards of conduct required of all employees, and is intended as a guide for decision-making, based on respect for the set of common values and principles shared by the EADA community.

To ensure the trust of our stakeholders, our suppliers and the general public, all employees will respect and adhere to this Code of Ethics.

Mission

EADA bases its activity on training, research and the transfer of talent and knowledge to the business world. Our mission is to promote professional development, the growth of people and the transformation of organizations, in order to contribute to a fairer, more caring and sustainable society.

Vision

EADA is an internationally accredited educational institution recognized for the excellence of its experiential experience, based on the proximity to the reality of current and future management, and with the ambition to help develop sustainable leadership in companies.

We aspire to create an open space for growth, transformation and learning that accompanies people and organizations throughout their life cycle, in alliance with other organizations that share our values and complement what we contribute to society.

Values

EADA's project is based on the following values:

INDEPENDENCE: We are an independent, non-profit foundation that defends the freedom of thought and expression of its participants, faculty and other stakeholders.

DIVERSITY: In our programmes and activities we incorporate, develop and enhance the best of the people and cultures around us. We reflect the cosmopolitan essence of the city of Barcelona, its diversity and creativity, as well as its long tradition of entrepreneurship, commercial activity and hospitality.

CLOSENESS: We work hand in hand with organizations and companies, and train professionals who are able to act effectively and progress in their field of work.

QUALITY: Our training is based on nationally and internationally accredited excellence and on research committed to the business world.

RESPECT: We believe in people, in equity, and in the plurality of perspectives as the central axis of organizations.

INTEGRITY: We train professionals in honesty to ensure the sustainable future of their companies and the society around them.

INNOVATION: We constantly create innovative content and formats in our activities to contribute to overcome, in a sustainable way, the changes that occur in our environment.



COLLABORATION: The EADA team develops its mission by sharing, communicating and developing the values of the institution.

SUSTAINABILITY: It represents the transversal axis that links the different values of EADA with its purpose and the strategic plan of the institution.

Institutional endorsements

Since 2009 we are signatory members of the Spanish Network of the United Nations Global Compact. This international initiative promotes the implementation of the 10 universally accepted Principles of the Global Compact to promote CSR in the areas of human rights, labour standards, environment, anti-corruption activities and business strategy in the company.

We promote, in all training programmes, the adoption of the Six Principles of PRME -Principles for Responsible Management Education-, an initiative launched in 2007 by several business schools with the support of the United Nations to promote responsible education.

We also join the general principles of action declared by the Coordinadora Catalana de Fundacions: the right to work effectively and efficiently with the available resources; to act with professionalism; from quality and transparency with its users/beneficiaries and with society, both in the results obtained and the means used, asserting rights and duties with a realistic and responsible vision.

Ethical code

What is it?

This document sets out the basic institutional principles that must guide the behavior of individuals and the organization within the framework of its activities.

This Code does not include a list of all the behaviours that could be considered improper, but it establishes a common basis that can be understood by all its addressees, and guides them on the legal and ethical issues that may arise in order to be able to deal with them appropriately.

What is its purpose?

The Code has been created to reinforce our commitment to act in accordance with the values that govern EADA, promoting ethical business practices and fair behaviour towards its employees and members, as well as towards its suppliers and partners.

It also aims to analyze the current legal system to prevent behaviors that may involve criminal liability of the Foundation, its Board of Trustees, its directors and employees, as well as to provide the organization with a framework of action and reference for its Compliance policies, and a secure channel of communication to report any circumstance that may affect the proper compliance with this Code.

Scope of application

The Code applies to all EADA professionals and serves as a guide for all our decisions. It contains rules of conduct that govern relations between people working at EADA, but also with third parties, whether clients or suppliers.

With this Code of Ethics, the Board of Trustees of EADA formalizes its commitment to the culture of the Foundation, its commitment to the values that underpin the organization and reinforces its desire to comply with regulations, requiring all those who interact with the institution to actively comply with it.

The Board of Trustees approved this Code on January 21, 2020 and informs its staff and collaborators of the same, requesting their involvement so that each one of them can assume it as a personal commitment to the Foundation and the principles on which it is based.



Article 1. Compliance with laws, rules and regulations

All of us who form part of EADA assume, as part of our obligations, respect for the ethical culture that defines our institution, while we are responsible for strict compliance with the regulations in force at all times, not only with regard to relations between the Foundation and staff, but also with regard to the relations of employees with each other, and also with third parties.

To ensure that we comply with the mandate of the Board of Trustees, in the hiring process it is mandatory to read our Code of Ethics as an essential document for the understanding of our culture, for its subsequent assimilation and signature.

At all levels of EADA we will ensure the real and effective application of the prevention and control measures set out in this code, so that this system of self-regulation achieves the elimination of any behaviour that may jeopardize the reputation in the market and the tangible and intangible assets of EADA.

This Code will be adapted to jurisprudential trends and legal modifications that affect the Foundation's liability.

Article 2. Conflicts of interest

A conflict of interest is defined as a situation where the personal interests of a professional or third party compete with those of EADA.

In our day-to-day work, we constantly make decisions and in order to comply with EADA's ethical standards and those required by current legislation, we must always put the interests of our clients before those of the Foundation, and those of the Foundation before our own.

When we are faced with a possible conflict of interest, we will inform our superiors, the Compliance Committee or the Board of Trustees. Sometimes, it will be possible to resolve the conflict to the benefit of all, and this will help us, in any case, to improve our decision-making processes.

Failure to disclose a potential conflict of interest would constitute a violation of this Code and, therefore, an offense punishable by labour law.

Article 3. Bribery, corruption and favoritism

EADA values its reputation for ethical conduct and integrity. We understand that, apart from constituting a crime, any case of corruption would have a negative impact on our prestige and image.

Corruption involves the abuse of power or position for the benefit of the person who exercises it, and includes bribery, extortion, public and private malfeasance, fraud and money laundering.

Bribery is the acceptance, solicitation or offer of financial compensation, gifts, hospitality or other favours in exchange for something valuable or advantageous to the briber.

Of course, we may not offer or accept, directly or indirectly, bribes or facilitation payments of any amount from/to third parties, whether public or private. We will be especially cautious when dealing with countries where the practice of facilitation payments is part of the local culture.

If bribery involving a person connected with EADA occurs, the Foundation will be liable, even if it had no knowledge of such bribery. Therefore, third parties may not be used to try to conceal it. No suppliers, agents, consultants, distributors or business partners may offer or receive bribes in connection with their work for the company.

In this regard, no donations shall be made to charities, political parties or other organizations with the intention of obtaining a commercial advantage.



All EADA employees and representatives are required to refuse, if asked to make a facilitation payment - which is a payment made to a government official to obtain or expedite a routine government action, such as processing visas, planning inspections, protecting the delivery or collection of mail, or discharging supplies.

Nor may they accept cash payments in excess of the legal limits in force at any given time or without justification of the origin of the funds, as such transactions could contravene money laundering and terrorism prevention regulations.

EADA adopts a zero-tolerance position with respect to any corrupt conduct, and will ensure all necessary procedures, including the training of its employees and managers, so that the conduct of the institution is at all times honest and ethical, regardless of the field in which its activities are carried out.

Article 4. Gifts and invitations

It is considered that these practices may have an impact on individual decisions and harm free competition in the market.

Certain gifts of value can always be considered improper: any gifts, money, loans, redeemable vouchers, similar monetary advantages, or invitations intended to influence decisions.

This code permits the receipt of occasional non-cash gifts of a nominal value of less than or equal to 30 euros. In cases where this amount is exceeded, the gifts will be donated to the EADA Teaming committee with the aim of donating the proceeds to a third sector organization.

Meals or invitations to regular and reasonable events may also be accepted, provided there is a legitimate business purpose.

Occasionally, EADA offers small gifts (such as pens, diaries, backpacks, etc.) to clients, suppliers and others. If the gift in question has been authorized by your superior, it may be given to the person concerned.

EADA organizes events to thank customers and suppliers for their loyalty and collaboration: if it is deemed necessary to organize an additional meeting, prior approval must be obtained from the department management.

It is considered usual and permitted, for commercial purposes, to offer discounts on training programmes to suppliers or clients of interest, either for commercial purposes or in order to achieve an optimal number of participants in a programme.

In case of doubt, the question should be referred to our line manager, the Compliance Committee or the Board of Trustees.

Gifts or invitations that do not comply with the provisions of this Code must be diplomatically refused on the basis of this document.

Article 5. Accounting, tax and labour obligations

EADA complies with all its tax and labour obligations and, with the same zeal, its employees must ensure compliance with these obligations on the part of clients and suppliers, when they are entrusted with this function.

The financial information, accounts, contracts and auxiliary documentation faithfully record the nature of the transactions that EADA carries out, so that the annual accounts reflect the reality of business operations.

Consequently, employees and directors undertake to ensure that the information in the preparation of which they participate is complete, true and reliable.

Each year, the annual accounts are subject to an independent external audit and are then submitted to the Protectorate of the Generalitat de Catalunya.



Article 6. Prevention of money laundering and the financing of terrorism

EADA complies with the regulations governing the prevention of money laundering and the financing of terrorism and, to this end, all its economic transactions are carried out through banks, authorising only cash payments and collections that do not exceed €2500 per transaction.

In order to comply with these regulations, it is necessary that we follow all procedures and assess the integrity, quality and credibility of our customers and suppliers.

In particular, cash receipts and payments in excess of the legal limits are prohibited; these limits are set per transaction, not for each individual payment or collection.

Article 7. Defence of competition and commercial legality

EADA believes in honest, fair and loyal competition and, consequently, we do not accept misleading, fraudulent or malicious conduct.

We must compete with integrity and in compliance with competition laws, without spreading inaccurate comments regarding the products or services offered by our competitors. We will in all cases avoid abusive or unfair commercial practices.

EADA will not share confidential information with any competitor or other third parties and will respect the confidential nature of the information of third parties that they may communicate to EADA in the performance of their commercial or institutional relations.

Commercial policy and prices will be established independently and will never be agreed with competitors or other unrelated parties, either directly or indirectly.

Engaging in verbal or written agreements that violate laws in this area is against our values and compliance with this code and will be sanctioned.

Article 8. Protection of intellectual property

We support the existence of a legal and regulatory environment that protects intellectual property rights and respects both our own and those of third parties, meaning processes, improvements or developments, as well as patents, brands or any publication/information of value to our organization.

The EADA brand and logo must be used correctly at all times, respecting the prestige of the institution. Their use by third parties will be restricted and their improper or unauthorized use will be controlled.

Only brands, images and texts authorized by the General Management will be used.

Article 9. Protection of personal data and confidential information

In the course of our daily work, we have continuous access to confidential data of clients, as well as of the Foundation itself and its employees or collaborators. EADA must guarantee their confidentiality, as well as their exclusive use for the purposes for which they were collected, in full compliance with the provisions of current regulations on personal data protection, Regulation (EU) 2016/679 of 27 April 2016 and Organic Law 3/2018, of 5 December, on the Protection of Personal Data and Guarantee of Digital Rights and other applicable regulations (hereinafter LOPDGDD).

We provide all employees with a confidentiality and professional secrecy agreement, which they are obliged to comply with.

EADA has implemented a policy on the protection of personal data and confidentiality clauses in order to provide the best service and maintain the prestige of the Foundation. By means of these clauses, all managers and



employees must undertake to maintain secrecy and not to use information belonging to EADA or our clients that is not intended to be disclosed to third parties for their own benefit or that of third parties.

This duty of confidentiality must also be respected among colleagues, sharing only the information required for each job.

We are committed to the implementation of a culture of privacy in the institution, which is why it is necessary that the people authorized to process personal data have the necessary information in this regard and take responsibility for it.

To this end, EADA will ensure that the personal data to which it has access is collected and processed in a fair and lawful manner. To this end, the holders of such data must be informed of how they will be handled and for what purposes. To this end, EADA will have a Privacy Notice which will include an email address to which interested parties may turn to exercise all the rights they are entitled to with regard to data protection.

EADA will only process personal data to which it has access in the following cases: (i) where the data subject has consented to such processing for one or more specified purposes; (ii) where the processing is necessary for the performance of a contract to which the data subject is a party or in order to take steps at the request of the data subject prior to entering into a contract; (iii) where the processing is necessary in order to comply with a legal obligation; (iv) where necessary to protect the vital interests of the data subject or another natural person; (v) where necessary for the performance of a task carried out in the public interest; or (vi) where necessary for the purposes of EADA's legitimate interests, except where such interests are overridden by the interests or fundamental rights and freedoms of the data subject which require protection.

EADA undertakes to collect only such data as are necessary to fulfil the purposes indicated in the previous paragraph and to the extent necessary for those purposes.

Personal data shall not be retained for longer than is necessary for the fulfilment of the relevant purpose, and once this purpose has been fulfilled, it shall be anonymised or deleted, unless there is a legal obligation requiring it to be retained for a certain period.

Personal data shall be transferred or stored electronically or otherwise in a reliable and secure manner, taking all appropriate technical and organizational measures to protect personal data against unauthorized or unlawful processing (including unauthorized or unlawful access) and against accidental loss, destruction or damage.

All personal data/information provided to EADA may only be used by EADA and must not be transferred to any other company, unless such information has been disclosed to the data subject and the data subject has consented to such data exchange or there is other legal justification for doing so.

Any person authorized to process personal data is required to read, understand, comply with and enforce this data protection security policy as a measure to protect the data that form part of the processing entrusted to them.

In this regard, to ensure and enforce compliance with this policy, the Board of Trustees has appointed a committee for compliance with the LOPDGDD, which will be available to all staff and will be responsible for coordinating, controlling, developing and verifying compliance with the LOPDGDD, and which will be responsible for coordinating, controlling, developing and verifying compliance with the LOPDGDD.

Article 10. Families and relatives

Our recruitment policy does not contemplate the incorporation of direct family members and partners of employees, except as provided for in the following paragraph. In this way, we ensure not only a clean, transparent and orderly selection process, but also avoid generating possible doubts in relation to the competencies, experience, and requirements of the position on the part of the candidate.

The only exception to the entry of qualified family members for the open vacancy will be with job offers where the required profiles have not been submitted through the different recruitment sources and which have followed the selection process together with other candidates and, in addition, are temporary positions.



Article 11. Protection of workers

Health and safety at work

The physical integrity, health and life of workers are rights whose protection must be a permanent priority for those who work at EADA and, especially, for those who perform managerial functions.

We are committed to achieving a high level of health and safety at work, not limiting ourselves to complying with the legal provisions in force, but going beyond the minimum requirements if necessary, so that in each workplace there is optimum protection for each worker, providing and maintaining a healthy and safe working environment that includes safe access and adequate facilities.

EADA's people management policy includes the following commitments:

Provide training to enable employees to carry out their work safely;

(ii) Conduct risk assessments, implement identified control measures and ensure that safe systems of work are in place in relation to all work activities;

(iii) Establish emergency management programmes and investigate all occupational health and safety incidents that may occur;

(iv) Conduct regular audits of compliance with this policy, documenting all incidents that have occurred and taking appropriate action to prevent future occurrences.

This commitment to prevention and the responsibilities that derive from it affects all levels of EADA, the governing bodies, management, teaching and research staff, service staff and participants. Only by assuming this policy, compliance and respect for the rules by all levels and in all activities will we be able to achieve this objective.

Respect and equality

The dignity, respect and equality of workers are rights recognised and protected by our institution.

All EADA employees are protected by the Foundation against any type of discriminatory, harassing or offensive conduct that violates their dignity due to their gender, race, colour, nationality, religion, political opinion, age, sexual orientation or any other category that the law establishes as requiring protection.

EADA will ensure and prosecute those who, acting on behalf of the entity, discriminate against or harass another person or group in any way, either directly or indirectly, whatever the reason.

There is an equality plan promoted by our Board of Trustees, which monitors its compulsory compliance by all members of the institution. The equality plan is clear and public and acts on any type of discriminatory conduct, measures and sanctions to be adopted.

Dress code

The dress and appearance of all employees should reflect a professional image. The appearance of employees can influence public perception and working practices, both when they are carried out on our premises and when we act in other settings on behalf of EADA.

Anyone who has been issued with a work or safety uniform must comply with the relevant guidelines when wearing it and is responsible for keeping it clean and in good condition.

EADA reserves the right to recommend and request that the image offered by its staff at workplaces and times should not have any type of identification denoting religious affiliation, ideology, nationality, political or sporting opinions.



Article 12. Best practices in electronic communication

EADA provides all staff with the necessary IT tools to facilitate their daily work. Their use must comply with the procedure established by regulation, which must be signed by all members of the organization within the framework of its welcome process.

We would also like to stress the importance of all internal and external emails being written in a professional manner: these are business communications, and an e-mail should never be sent that could compromise the institution or the employee if the document were to be made public.

EADA employees shall refrain from issuing or publishing, under any medium or format, opinions on behalf of this institution, without prior authorization from their superiors. In any case, they shall ensure that their opinions, even in a personal capacity, do not undermine the values of EADA or compromise its reputation in any way.

Article 13. Sustainability and environmental protection

EADA promotes sustainable development, which implies an attitude of maximum respect for the environment where it carries out its activities. We are all responsible for contributing to minimizing the environmental impact of our institution in our centres in Barcelona and Collbató. If incidents occur, we must ensure the effective activation of the protocols for their correction.

In its relationship with third parties, EADA ensures that its actions in this area are consistent with those of our Foundation. The professionals directly involved, depending on their area of responsibility, must be familiar with the laws, policies, processes and controls of the organization in this area. The contracted collaborating organizations must carry out their work in accordance with environmental protection regulations. For example, construction, remodelling or restoration work, among others, may only begin once the corresponding licenses and authorizations have been obtained.

Communication channels related to compliance with the Code of Ethics

The purpose of the communication channels provided for in this Code is to make it easier for those who become aware of any breach of the Code of Ethics to report it to the Institution, so that the Institution may take the measures it deems appropriate.

In case of doubt, any person may contact their hierarchical superior, the Compliance Committee created by mandate of the Board of Trustees or, if it is easier for them, the Board of Trustees directly to request clarification, or to bring to its attention any conduct that may be irregular or conflictive.

If you wish to file a complaint and wish to do so anonymously and confidentially, we have a complaints channel that can be accessed through our website, in the space dedicated to transparency: <https://eada.canaldenunciasanonimas.com/home>.

The identity of the person who reports an anomalous situation is guaranteed to be preserved.

EADA will actively ensure that in no case will there be reprisals against persons who, acting in good faith, report the existence or suspicion of apparently irregular conduct, even if, after the appropriate investigation, it has not been possible to conclude the existence of any infringement.

On the other hand, if it is proven that the whistle-blower has knowingly filed a false report, he/she shall be subject to the corresponding disciplinary measures. The same action will be taken when the purpose of the report is for the complainant's own personal gain or advantage.

We also have suggestion boxes located at the reception areas of the Barcelona and Collbató campuses.



Non-Compliance

It is the responsibility of each employee to consult this code whenever in doubt to ensure full compliance with all its provisions and the highest standards of integrity. It is the obligation of each individual in his or her personal capacity. Failure to comply may result in disciplinary action, including the possibility of dismissal, without prejudice to civil and criminal prosecution if appropriate.

Procedure

In order for a complaint to be considered valid, at least the following requirements must be met:

- Identity of the complainant, which will be kept confidential if so requested.
- Content of the complaint and the evidence or evidence on which it is based.
- Person or persons to whom the alleged facts are attributed.

The Committee shall analyse the information submitted and make the pertinent inquiries. Once the results have been evaluated, the committee will determine whether the complaint is admissible and, if appropriate, will transfer the file to the corresponding area to complete the investigation, concluding the process with the proposed resolution that said area will submit to the company body, which is responsible for issuing the resolution that, as a result of the initiation of the file, will be adopted. This resolution will be forwarded, for the appropriate purposes, to the People and Culture Department, which will apply the appropriate disciplinary measures in accordance with applicable labour legislation, which may lead to the termination of the employment relationship, without prejudice to other responsibilities that the employee may have incurred. Employees have the duty to inform the Compliance Committee when they have reasonable indications of the commission of any irregularity, violation of the law or of the Code of Ethics.

Exceptionally, if anonymous reports are brought to the attention of the Compliance Committee, the Committee will assess the credibility and consistency of the same, and will decide to initiate, if it deems it appropriate, the corresponding informative procedure, which may lead, where appropriate, to a subsequent disciplinary procedure.



APPROVAL AND VALIDATION OF THE CODE OF ETHICS

This Code of Ethics has been approved by the Board of Trustees. The Code will be reviewed and updated at the intervals indicated by the Board of Trustees and the Compliance Committee.

DOCUMENT JUSTIFYING KNOWLEDGE OF THE EXISTENCE AND OBLIGATIONS ESTABLISHED IN THIS CODE OF ETHICS.

I declare that I have read and agree to comply with this Code of Ethics.

Place and Date:

Name and Surnames:

Signed by: _____ (employee)