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COMPLIANCE: Ethics Code

Regulations

History of Document revisions

Version	Date	Summary of Changes	Author	Revised by	Approved by
2	11/2023	Revision of the law 2/2023 20 th February, regulation of protection of individuals who report regulation infractions and fight against corruption.	Compliance Committee	Compliance Committee	Board of Trustees Fundación Privada Universitaria EADA
1	02/2022	Information on the implementation of the new software to manage the institutional complaints channel is included.	People and Culture Technician	Compliance Committee	Board of Trustees Fundación Privada Universitaria EADA
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Summary

Introduction	3
Mission	4
Vision	4
Values	4
Institutional endorsements	5
Ethical code	5
Article 1. Compliance with laws, rules and regulations	6
Article 2. Conflicts of interest	6
Article 3. Bribery, corruption and favoritism	6
Article 4. Gifts and invitations	7
Article 5. Accounting, tax and labour obligations	8
Article 6. Prevention of money laundering and the financing of terrorism	8
Article 7. Defence of competition and commercial legality	8
Article 8. Protection of intellectual property	9
Article 9. Protection of personal data and confidential information	9
Article 10. Families and relatives	10
Article 11. Protection of workers	10
Article 12. Best practices in electronic communication	12
Article 13. Sustainability and environmental protection	12
Communication Channels related to compliance with the Code of Ethics	12

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 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 November 28, 2023 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 fulfillment 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, the 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 work places 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 centers 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, remodeling 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.

EADA has established a whistleblowing channel, which can be accessed both by persons linked to the institution and third parties who may be aware of incorrect or illegal practices and wish to report them, in order for the entity to initiate an internal investigation.

The whistleblowing system implemented by EADA has been adapted to Directive (EU) 2019/1937 relative to the protection of persons who report breaches of EU law, as well as to Law 2/2023 of 20 February, regulating the protection of persons who report regulatory breaches and the fight against corruption.

Reports can be submitted through the platform set up for this purpose at the following link <https://eada.canaldenunciasanonimas.com/es> and can be anonymous. We recommend, however, that the whistleblower leaves his or her contact details in order to facilitate the investigation.

They may also be processed by means of a face-to-face meeting with the person responsible for the internal system, appointed by the Board of Trustees of the Foundation.

Once a complaint has been received, the investigation process shall be initiated according to the following timetable:

a) within 7 calendar days of receipt, receipt of the complaint shall be acknowledged to the informant.

b) the person designated by the Board of Trustees as Head of the internal reporting system shall decide whether or not to accept the complaint, either (i) because the facts reported are not plausible or do not relate to a possible commission of one of the offences that may be reported through the Internal Channel, or (ii) because the report is manifestly unfounded, it has been submitted in bad faith or there are rational indications that the information supporting it has been obtained through the commission of an offence, or finally (iii) because the communication refers to facts subject to a previous commission and does not contain new and significant information that justifies its processing or is a matter of well-known facts that are publicly known

In the event that the complaint is inadmissible, the informant will be notified of this decision within 5 working days, unless the complaint was anonymous or the informant has waived receipt of communications relating to the procedure.

If the complaint is admitted, the person under investigation shall be informed of the filing of the complaint within one month of receiving the communication, provided that the information provided to the person under investigation does not jeopardise the success of the investigation. If necessary, the period of one month may be extended up to a maximum of thirty days, for reasons that must be duly justified and documented.

Once the complaint has been admitted, the person in charge of the system shall carry out the appropriate investigative procedures and propose the adoption of the appropriate measures.

If appropriate, the final resolution will be forwarded to the People and Culture Department, which will apply the appropriate disciplinary measures in accordance with the applicable labour legislation, which may lead to the termination of the employment relationship, without prejudice to any 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.

These investigation actions may last up to an ordinary maximum period of three months; only in cases of special complexity may the period be extended for a further three months.

The person responsible for the whistleblowing and whistleblower defence channel will have the support of the Compliance Committee, and will report periodically to the Board of Trustees of the Foundation. The Board of Trustees has appointed Mr. Antonio Coca Macías as the person in charge of the Whistleblower Protection System.

EADA will keep a record of the communications in the manner provided for by law.

Informants will enjoy the protection legally established at all times, provided that they have acted in good faith.



EADA will adopt the necessary measures to ensure the protection of the information, guarantee the confidentiality of the information, as well as the anonymity of the informant, in the cases provided for by law, as well as the protection of the informant against possible reprisals.

At the same time, the persons subject to communication and/or investigation shall enjoy the benefit of innocence, the right of defence and access to the file in the manner provided for by law.

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)