

Annual report

Annual report on the UIC Barcelona Code of Conduct for the 2021-2022 academic year

1. Introduction

Organic Law 5/2010, of 22 June, introduced into the legal system the criminal liability of legal persons as a result of the international harmonisation of criminal law. This incorporation was made through the regulation of Article 31 bis of the Criminal Code, a regulation that was criticised from the outset by a broad sector of the doctrine, which considered it incomplete and confusing in many essential aspects. It was in 2015, by means of Organic Law 1/2015, of 30 March, and with the purpose of clarifying the interpretative doubts that had been raised by the previous regulation, that the definitive wording was provided for article 31 bis, among others, and the doubts surrounding the interpretation of the criminal liability of legal persons were clarified.

The most significant aspect of this reform is the specification of the requirements for legal persons and the express exclusion of criminal liability when they "comply" with certain conditions. These requirements will also serve to mitigate criminal liability where no exemption is granted for lack of any requirement.

The Criminal Code sets out the requirements for organisational and management programmes or systems that legal persons must apply to their organisations in order to comply with the standard.

The Universitat Internacional de Catalunya, Fundació Privada (hereinafter UIC Barcelona) complies with the requirements of the Criminal Code and has developed a criminal compliance programme, called "Criminal Compliance".

In this context, UIC Barcelona will use this report to publicly carry out the actions carried out during the 2021-2022 academic year as part of its Criminal Compliance programme.

1. Actions

—Analysis and study of potential criminal risks at the University.

Interviews with the heads of services, departments, faculties, etc.

—Communication channel:

Email address: canaldedenuncia@uic.es

The purpose of creating this email account is to provide a channel through which internal complaints regarding this matter can be made, as well as any related queries that any member of the UIC Barcelona community may have.

1. **Actions to be implemented**

- More dissemination and raising awareness among the entire university community by the compliance officer.
- Review and adapt, if necessary, the internal compliance regulations and the Code of Conduct.
- Make progress in terms of equality and non-discrimination policy.
- Progress in environmental policy, taking new measures or improving existing ones.
- Continue monitoring the integrity of the different cooperating companies, cooperation agreements, student work placement centers, etc.
- As a result of the complaint files against a university employee (legally bound) for alleged malpractice, the Compliance Officer, applying the Code of Conduct, opened the appropriate file to resolve the situation.

1. **Assessment**

The work of the compliance officer, and the monitoring of planned actions, are deemed to have been fully satisfactory during the 2021-2022 academic year.

UIC Barcelona will continue its efforts to make progress and improve in the years to come.

Barcelona, 25 May 2022