

CODE OF CONDUCT



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PREFACE

UIC Barcelona is founded on the inspiring ideals of Christian humanism and upholds the principles of freedom, justice, equality and plurality, which it applies to its internal workings with earnest adherence to the Spanish Constitution and the Statute of Autonomy of Catalonia, and with full independence with regard to any outside interference.

The search for truth and intellectual rigor must be present in both its teaching and research. However, freedom in teaching, study and research is guaranteed.

The thorough understanding of these freedoms is accompanied by respect for the truth and people's dignity, the defence of human rights and the loyal fulfilment of contractual obligations.

At the same time, UIC Barcelona also requests all its members to respect and faithfully collaborate with the basic institutional criteria at the heart of the creation of the Universitat Internacional de Catalunya.

For that reason, and bearing in mind the size and complexity of the university, solid organisational support is needed that contributes to avoiding legal and reputational risks in order to guarantee the sustainability of the management model.

This code acts as a point of reference to provide professionals with clear directives on how to uphold UIC Barcelona's ethical rules and the UIC Barcelona IDEOLOGY in their daily activities. Its purpose is for them to assimilate the set of principles, values and rules intended to inspire the behaviour of UIC Barcelona members.

Clearly, this code does not pretend to cover every situation or detail, which is why mechanisms are established that allow for the resolution of queries arising on any issues that may involve ethical implications.

Is a Code of Conduct necessary?

The Code of Conduct is a key element for guaranteeing that the appropriate mechanisms are in place to support members of the university community in fulfilling their obligations and carrying out their activities at UIC Barcelona.

Who does the Code of Conduct apply to?

The Code of Conduct affects every member of the **UIC Barcelona** university community, independently of their role, location or hierarchical level and it covers all activities regardless of titles.

That includes the governing bodies, management staff, academic and administrative staff, as well as the students themselves who must commit to and engage in the improvement of educational quality through their own personal efforts and in collaboration with the University.

Furthermore, all UIC Barcelona suppliers, in the broadest sense of the word, must

also work according to the rules and standards of behaviour detailed in this Code of Conduct

CODE OF CONDUCT REGULATIONS

1- INTRODUCTION

(1.1) The purpose of this Code of Conduct is to establish the values, principles and rules that will govern the behaviour and actions of each and every member of the UIC Barcelona university community as well as the members of its governing bodies.

At the same time, this Code will also apply to its users and suppliers insofar as the principles, values and rules contained in the Code can be applied when carrying out commercial activities with UIC Barcelona or in its name whenever UIC Barcelona has the ability to enforce them.

(1.2) The **values** that guide the work of UIC Barcelona are as follows:

- ✓ **Giving guidance to people**, recognising that the main asset of the university is its people, whether students, lecturers, employees, users or suppliers. A priority for UIC Barcelona is treating everybody with dignity, valuing their contributions towards the achievement of personal and professional success. This respectful treatment must be evident in all written and oral communication.
- ✓ **Integrity**, in the sense of promoting a culture of integrity, honesty and a respect for the law and standards of morality, applicable both to the interests of UIC Barcelona and to those of other interest groups.
- ✓ **Respect for diversity** in all its manifestations compatible with human dignity and universal human rights. In the case of UIC Barcelona, this diversity is based essentially on a commitment to and respect for all human beings and the acceptance of plurality.
- ✓ **Confidentiality of private communications** received and a commitment not to pass data obtained to third parties by means of distribution lists or information from the public areas of the UIC Barcelona Virtual Campus.
- ✓ **The promotion of open knowledge**, compatible with respecting intellectual property rights involved in all of the academic and professional activities undertaken at UIC Barcelona. We are committed to imparting knowledge and giving due recognition to the authorship of the ideas, materials or documents used.
- ✓ **The participation of the entire community in the dynamics of the University**, using the appropriate channels to facilitate the free expression of proposals and actions needed to maintain and improve our activity, promoting dialogue and accountability within the university community.

- ✓ **Innovation**, as the cross-cutting axis around which all actions revolve. UIC BARCELONA is open to educational, technological and institutional innovation while also promoting entrepreneurial initiatives and the creativity of the people who make up the university community.
- ✓ **Quality as an institutional culture.** We work towards excellence in education services and activities related to teaching, research and organisational processes. We will ensure that the voices of students, graduates and UIC Barcelona are taken into account and will apply academic rigor to the teaching programmes and lines of research.
- ✓ **The dignity of working, professional and educational conditions**, with the provision of the resources and conditions required to perform the functions of the different groups that work at or collaborate with UIC BARCELONA.
- ✓ **The commitment to imbue UIC BARCELONA with the set of values traditionally associated with university activity**, such as freedom, equality, dialogue and a critical eye.
- ✓ **Environmental responsibility:** sustainability, respect for our habitat and reducing adverse impacts on the environment is an urgent commitment as we all have a common responsibility towards present and future generations.

(1.3) This code is intended as a compendium of rules that are partly based on the aforementioned values, but which also include some specific fundamental principles in respect of how UIC Barcelona operates. These rely, above all, on the trustworthy and ethical conduct of each person this Code applies to.

(1.4) UIC Barcelona will promote knowledge of the code among all its employees in addition to the other target groups mentioned so that their personal conduct is entirely based on the principles of this Code.

Thus, for the Code to be applied effectively, it is necessary for all employees and management staff to know its content as well as any supplementary developments and relevant legal regulations that apply to the activities they carry out as a consequence of their role at the university.

Any query arising from the interpretation or content of the Code or resolving any situations not specifically covered in writing must be clarified by the appropriate senior hierarchy or, ultimately, by the Board of Governors or the Board of Trustees according to the subject matter.

(1.5) Without prejudice to any other liability that may arise, noncompliance with the criteria and conduct guidelines contained in the Code will lead to the appropriate disciplinary sanctions being applied according to the appropriate employment legislation or any other type of legislation that governs the relationship with UIC Barcelona.

2- SCOPE, APPLICATION AND COMPLIANCE

2.1. SUBJECTIVE SCOPE OF APPLICATION.

This Code of Conduct will apply to the following people, whether natural persons or legal persons according to each case:

1st - **EMPLOYEES**, regardless of the type of contract that determines their working relationship, the position they hold or the geographical location in which they perform their work. People who provide their services while physically on university premises will also be considered as employees, even though they are not part of the company's organisation.

2nd - **MANAGEMENT STAFF**, regardless of the type of contract that determines their working relationship, the position they hold or the geographical location in which they perform their work. In all cases, management staff will be deemed to be those people with work contracts issued by Senior Management (defined as those who report directly to the Board of Governors and/or the Board of Trustees).

3rd - **MEMBERS OF THE GOVERNING BODIES** of the university, regardless of the composition, format or operating methods of the body in question.

4th - **STUDENTS, USERS AND SUPPLIERS** insofar as it may apply to them and provided that UIC Barcelona has the ability to enforce it.

The people referred to in sections 1 to 4 above will be jointly referred to as "**Obligated Parties**". The group of natural persons or legal persons included in the subjective scope of application will be referred to as "**Target Users**" of the Code.

2.2. ACCEPTANCE AND COMPLIANCE

(2.2.1) UIC Barcelona will adopt the necessary measures to put into effect the set of values, principles and rules that make up this Code, circulating its content among the Target Users and resolving any queries that its implementation might generate. To this end, efforts will be made, as far as is possible, for Obligated Parties and the rest of the Target Users to commit to complying with it, so that these values, principles and rules, along with the regulations applicable in each case, form the basis of their activities within the university or their commercial or institutional relationships with it.

(2.2.2) Nobody, regardless of their position in the university, is authorised to request a recipient of the Code of Conduct to contravene anything laid down in it. No Obligated Parties can justify conduct that violates the code or defend wrongdoing by using a position of power or claiming ignorance of the content of the code.

(2.2.3) The content of the code will prevail over any internal rules that might contradict it, unless such rules establish even stricter conduct requirements.

(2.2.4) Under no circumstances should the application of the code result in violating any legal provisions that apply. Should such circumstances arise, the content of the code must be adjusted to comply with these legal provisions.

(2.2.5) The code does not amend the existing working relationship between the university and its employees, nor create any rights or contractual obligations whatsoever, but it implies that the rules contained therein should be integrated into the way in which the working relationship is conducted.

(2.2.6) The university does not tolerate the committing of a criminal act by any employee or manager or member of the Board of Governors or Board of Trustees, even when the crime is committed by third parties for the purpose of benefitting from the university, either directly or indirectly.

UIC Barcelona will strive not only to do what is legal but what is right. For precisely that reason, it will not permit any criminal activity to be carried out in its name.

3- ETHICAL AND RESPONSIBLE BEHAVIOUR (RULES OF CONDUCT)

3.1. GENERAL PRINCIPLES

All Obligated Parties are responsible for knowing and complying with the **laws applicable** to their duties according to their area of responsibility and place of work, fulfilling these duties and obligations while fully respecting the established procedures in their field of activity.

Should doubts arise, Obligated Parties can obtain assistance on how to comply with the content of this code and other applicable regulations through their immediate hierarchical superior or, if appropriate, through the Board of Governors, Compliance Officer or the Ethics and Compliance Committee (as determined by the Board of Governors).

Noncompliance with the regulations described above may incur the legal liabilities that result from it, notwithstanding the appropriate disciplinary action, including dismissal.

In addition to compliance with this code, the regulations applicable in each case and UIC Barcelona's internal procedures and processes, all Obligated Parties must demonstrate ethical behaviour in all of their professional actions and avoid any conduct which, even without breaking the law, could damage the university's reputation and negatively affect its interests and public image (such as inappropriate use of social medias).

Using social media to advertise activities organised by students that have nothing to do with the university's activity will be considered as conduct contrary to the Code of Conduct. Examples include using Facebook or Instagram to promote a party being held to raise funds for an end of degree course trip or to sell tickets to any kind of event not directly related to university activity.

3.1.1. RESPECT FOR THE LAW

In carrying out their professional duties, no Obligated Subject will consciously collaborate with third parties to break any national or international law, or collaborate with them in actions or omissions that compromise the principle of legality or which, if known about, could damage the reputation of the university.

In this respect, no excuse, pretext or pressure can justify conduct contrary to the law - national or international - or to internal regulations. Knowledge of deeds or conduct that may imply a violation of the law should be reported immediately through the Ethical Channel.

3.1.2. HONESTY AND TRUSTWORTHINESS

Obligated Parties must be honest and trustworthy in any negotiations in which the interests of the foundation are involved and at stake, strictly complying with their obligations.

Equally, they will protect the confidentiality of information they have been entrusted with relating to the University, as well as that relating to students, teaching staff, employees, users and suppliers.

The privacy of personal data benefits from very special protection at UIC Barcelona. Thus, it will not be permitted, under any pretext, to disclose information or the personal data of the university's students, teaching staff, employees and management staff, unless required by the law or judicial authority. Likewise, the existing security procedures for protecting such data will be respected.

It will constitute a serious breach of the Code of Conduct, even to the point of being considered a criminal offence, for an employee to divulge personal data to third parties that he or she has access to through their job role, such as telephone numbers, private postal or email addresses, current account details, or any other personal or private information.

It will also be deemed to be a breach of the Code of Conduct to publicise or contribute to publicising comments that violate people's physical or moral integrity or the honour of the institution. Those who form part of the university community have a duty of loyalty towards the institution and the people that constitute it.

3.1.3. INTEGRITY

Under no circumstances will Obligated Parties offer or accept gifts, invitations, hospitality services or other types of incentives that may reward or unduly influence a decision or that may serve to gain an unfair advantage.

In this regard, UIC BARCELONA self-imposes a strict policy of not accepting gifts or donation in cash or in kind. Exceptionally, Obligated Parties can accept gifts, invitations, hospitality services or other types of incentives that do not exceed what can be considered as commonplace, social or courtesy uses and which are strictly related to the activities of the University itself.

To ensure that these gifts, invitations and rewards are offered in good faith, a **local register of gifts and invitations** will be created under the control of the People Management Department, which will log the donor, the recipient and the estimated value. A report will be sent to the Compliance Officer on a quarterly basis.

Likewise, Obligated Parties cannot promise, offer or bestow any kind of benefit or advantage of an unjustified nature to managers, employees or collaborators of a commercial company or society, association, foundation, organisation or public administration designed to favour it or a third party above any others in the buying and selling of goods or in contracting professional services.

Offering gifts, invitations or rewards to third parties with the intention of influencing them to perform their duties in a dishonest way or under more favourable conditions than other users will constitute conduct contrary to the Code of Conduct to the point of it being a criminal offence.

Knowledge of any conduct that could be construed as a bribe will be reported immediately through the Ethical Channel

Obligated Parties will either avoid or declare any conflicts of interest that imply putting personal interests and priorities ahead of collective ones or those of the university, and they will behave with integrity, without seeking unjustified benefits or advantages of any kind that favour them or a third party above any others, thus failing in their obligations in respect of the purchase or sale of goods or in the contracting of professional services.

Obligated Parties will avoid or, according to the situation, will declare a conflict of interests that may put personal interests above collective ones. They will behave with integrity without, under any circumstances, seeking to benefit themselves or third parties by using their position or contacts at UIC Barcelona.

It will be deemed a breach of this code for an employee or manager to contract certain services and/or acquire goods from a company whose shareholders include one of their relatives or friends, and to conceal this information from UIC Barcelona.

In the same way, institutional activities will be performed with strict political neutrality, abstaining from taking a direct or indirect position either in favour or against legitimate political processes and protagonists.

Specifically, the University will abstain from all donations of any type, in cash or kind, to political parties, organisations, movements and entities, whether public or private that have clear connections to political activity.

3.2. MISSION OF THE DIFFERENT TARGET USERS OF THE CODE OF CONDUCT

Given the distinctive characteristics of the members of the university community according to their activity, in each case they need to try to safeguard a set of values and principles that consist of the following commitments:

3.2.1. GOVERNING BODIES AND MANAGEMENT STAFF

- ✓ To communicate this Code of Conduct to their teams.
- ✓ To lead compliance with the code through example. To act and take decisions using objective criteria, duly justified with equanimity and making appropriate use of the authority provided by their position.
- ✓ To give support to their teams in coping with the moral dilemmas that may arise at any time. To encourage actions and decision-making based on participation, consultation and communication channels, seeking to avoid unilateral decisions.
- ✓ To correct any incidents of straying from compliance with the Code of Conduct.
- ✓ To establish an appropriate timetable and mechanisms that will ensure compliance with the code in their areas of responsibility.
- ✓ To report on processes and actions that contradict the provisions of this code.
- ✓ To instil the principles of fairness, merit and transparency in hiring and promoting staff, and also the principles of equality and transparency for the purchase and provision of services.

- ✓ To promote a climate of trust and collaboration between all of UIC Barcelona's own team and their collaborators.

3.2.2. TEACHING AND RESEARCH STAFF (PDI)

- ✓ To commit themselves to quality and the continuous improvement of the teaching-learning and research processes in their field of knowledge.
- ✓ To participate, in a direct or delegated way, in the consultation and decision-making areas of UIC Barcelona that affect teaching and research.
- ✓ To be willing to be flexible and adapt to changes in responsibilities and tasks.
- ✓ To foster an atmosphere of trust and collaboration among teaching staff across all fields of study.
- ✓ To lead the teaching process and guarantee fluid communication between collaborating teaching staff and students.

3.2.3. ADMINISTRATION AND SERVICE STAFF (PAS)

- ✓ To commit themselves to quality and the continuous improvement of management processes and activities.
- ✓ To be willing to be flexible and adapt to changes in responsibilities and tasks.
- ✓ To participate, in a direct or delegated way, in the consultation and decision-making areas of UIC Barcelona that affect management.
- ✓ To foster an atmosphere of trust and collaboration among all management staff across all areas.

Both PDI and PAS members of staff are subject to the following obligations:

- a) To know the Code of Conduct and take decisions based on these principles and the policies derived from them.
- b) Additionally, they must communicate, in a responsible way, any indication of the existence of processes and actions that contravene the provisions of the Code of Conduct.
- c) Failure by management or employees to observe the code and the rules derived from the implementation of specific policies, duly communicated, could give rise to the opening and initiation of internal corporate investigation procedures as determined by the Board of Governors, possibly leading to disciplinary dismissal.

3.2.4. STUDENTS

- ✓ To commit themselves to the learning process, fostering attitudes rooted in the desire for knowledge, personal effort, responsibility, a critical eye and cooperation.

- ✓ To become involved in improving the educational quality of the University, using the participation and communication channels available.
- ✓ To promote an atmosphere of trust, collaboration and teamwork with other students.

4. SPECIFIC PRINCIPLES APPLICABLE TO ALL TARGET USERS

4.1 HUMAN RIGHTS

Relationships between all employees must always be based on non-discriminatory respect for people.

The university prohibits the abuse of authority and any type of harassment, whether physical or psychological, as well as any other behaviour that could create an intimidating, offensive or hostile work environment for people. No form of child or forced labour will be tolerated.

Expressing injurious, offensive, defamatory or degrading comments about other colleagues, directly or indirectly, and by whatever means - verbal, SMS, WhatsApp, social media, email, etc. - or adopting inappropriate behaviour that interferes with the normal performance of work duties will constitute a breach of this code, which might be considered to be a serious offence or even a crime.

The university recognises that the principle of equal treatment and opportunities for employees is an inspiring one for Human Resources and that it will be applied to recruiting and training employees, career opportunities, salary levels and other aspects of employee labour relations.

There will be no impediment or limitation to exercising the rights of association, union membership and collective bargaining within the framework of the regulatory standards for each of these fundamental rights.

The university will respect and promote human rights. It recognises that human rights are fundamental and universal, and must be interpreted and recognised in accordance with international law and practice, especially the United Nation's Universal Declaration of Human Rights and the principles proclaimed by the International Labour Organisation.

4.2 PROFESSIONAL DEVELOPMENT

UIC Barcelona will promote the personal and professional development of its employees, encouraging them to become involved in improving their own skills and abilities. Policies and actions applied to the selection, recruitment, training and internal promotion of employees must be based on clear criteria of ability, competence and professional merits. Consideration will be given to the internal promotion of employees to positions appropriate to each one.

Discrimination in the recruitment of employees for reasons of race, functional diversity, illness, religion, sexual orientation, political opinion, age, nationality or sex will constitute a breach of this code, which might be considered to be a serious offence or even a crime.

Employees will be informed of the assessment policies that apply to their job role and will actively participate within the framework of management processes constructed to improve their work, initiative and dedication.

4.3 COMMITMENT TO PEOPLE'S HEALTH AND SAFETY

UIC Barcelona will strive to guarantee a safe and healthy work environment for employees, adopting whatever measures are reasonable to maximise the prevention of occupational risks.

Furthermore, the university will provide the necessary means for the due fulfilment of any measures considered opportune to prevent occupational risks.

All employees will be responsible for maintaining their place of work, adhering to the rules and practices of health and safety.

It will constitute a breach of this code if any employees carry out their duties without respecting the measures introduced to prevent occupational risks in their place of work and not using the PPE (Personal Protection Equipment) provided to them for compulsory use.

4.4 COMMITMENT TO REPORTING HARASSMENT IN THE WORKPLACE

The university rejects any type of harassment at work, considering it to be unacceptable and intolerable and it will not permit either behaviour or organisational factors that display such conduct in the workplace.

Harassment in the workplace, a process by which a person, or group of people, engage in systematic and prolonged psychological violence towards another person or people, either at work or as a consequence thereof, for the purpose of harming or undermining their personal or professional status or getting them expelled from the organisation, will constitute a breach of this code, which might be considered to be a serious offence or even a crime.

4.5 ALCOHOL AND DRUG CONSUMPTION

The consumption of alcoholic beverages during working hours is prohibited, to the point that it could have an adverse effect on the safety and productivity of the working environment and the maintenance of employee's professionalism and sense of responsibility.

The consumption of drugs is totally prohibited on UIC Barcelona premises.

The consumption, supply or sale of drugs on UIC Barcelona property will constitute a breach of this code, which will be considered to be a serious offence or even a crime.

The consumption and sale of alcoholic drinks can only occur in the spaces set up to provide catering services. Only the supplier of catering services is permitted to sell alcoholic beverages.

Smoking is only permitted in the areas designated for this purpose.

Any conduct that does not comply with the actions described is totally prohibited. UIC Barcelona reserves the right to admonish or punish anybody who ignores these instructions.

4.6 CULTURE OF CONTINUOUS LEARNING AND IMPROVEMENT

Our desire for continuous improvement pushes us to encourage the ability to listen and take into account other people's opinions while maintaining a receptive attitude. Limiting people's professional and personal growth needs to be avoided.

UIC Barcelona must foster the professional development, training and promotion of its employees.

Furthermore, UIC Barcelona will encourage the university community to participate in all the events, competitions and grant applications that could have a positive impact on their learning.

4.7 BEHAVIOUR IN THE MARKETPLACE

All UIC Barcelona professionals are committed to complying with the current laws on unfair competition in force in the different countries in which they carry out activities, avoiding any action that could signify an abuse or illicit restriction to competition. Likewise, they must desist from engaging in any misleading advertising in respect of UIC Barcelona's activity.

In this respect, it is essential to understand what type of information we can gather on the competition and how we can use it, while at the same time guaranteeing that our own sensitive or confidential information is not revealed to competitors, especially in terms of research, either directly or indirectly.

UIC BARCELONA professionals cannot take advantage, for their own benefit or that of people connected with them, of information or business opportunities that they have become aware of through their place of work.

UIC BARCELONA professionals may not carry out other activities, either in their own name or on behalf of a third party, paid or unpaid, that are incompatible with their obligations arising from their working relationship with UIC Barcelona.

4.8 POLITICAL NEUTRALITY

As an institution UIC Barcelona declares itself to be politically neutral and does not take responsibility for the political opinions expressed by its students, lecturers, employees and suppliers. UIC Barcelona carries out its activity without interfering with or participating in the political processes in which its activities take place.

Any relationship UIC Barcelona has with governments, authorities, institutions and political parties must be based on the principles of legality and political neutrality.

UIC Barcelona recognises the rights of its professionals to exercise their rights of free expression, political thought and, in general, to participate in public life, so long as it does not interfere with performing their duties at UIC Barcelona and that it takes place outside the working environment and not on any UIC Barcelona premises, thus preventing an outside observer from associating UIC Barcelona with one political option or another.

Allowing publicity, direct or indirect, which employs any means of communication that incites discrimination towards any group because of its ideology, religion, etc., will constitute a breach of this code, which could be considered to be a serious offence or even a crime. This also applies to allowing employees to use the UIC Barcelona corporate mail service to send messages through social media that incite hatred or violence.

4.9 MONEY LAUNDERING

UIC Barcelona professionals must be especially vigilant in cases where there may be signs of a lack of integrity shown by the people or entities with which UIC Barcelona has a relationship.

The professional and management staff of UIC Barcelona has to pay particular attention to:

- Payments in cash (when these are permitted) that are unusual given the nature of the operation and the amounts involved.
- Payments by cheques payable to the bearer.
- Payments made in currencies other than those previously agreed upon or payments made in the legal tender of the country where the transaction takes place but involving a much higher amount than is usual for that country.

They also have to be alert to payments made by or on behalf of third parties that are not mentioned in the corresponding contracts, and to payments made into accounts other than the usual ones when dealing with a particular entity, company or person.

Attention should be given to payments made to people, companies, entities or bank accounts in tax havens, and to payments made to entities whose shareholders, owners or end beneficiary are impossible to identify.

Special attention should be paid to checking extraordinary payments that are not covered in the corresponding agreements or contracts.

Accepting payments involving large amounts of cash or else high denomination notes in payment for minor amounts will constitute a breach of the Code of Conduct.

It will also be considered a noncompliance for invoice payments to be made into bank accounts other than the one registered for the company unless the reason for such a payment can be justified.

4.10 BRIBERY AND CORRUPTION

UIC Barcelona understands corruption to be the use of unethical practices to obtain a benefit.

Under no circumstances may anybody connected with UIC Barcelona resort to illegal or unethical practices to influence the will of people who do not form part of UIC Barcelona in order to obtain a benefit either for UIC Barcelona or for themselves.

UIC BARCELONA specifically prohibits non-contractual or illicit payments to any person or entity, public or private, with the objective of securing or maintaining business or any other benefits or advantages.

UIC BARCELONA professionals cannot make, offer or receive, directly or indirectly, any payments in cash or in kind or any other benefit that, by virtue of its value, nature or circumstances, could reasonably alter the course of the commercial, administrative or professional relationships they are involved in.

However, these professionals should refrain from making any payments to facilitate or speed up procedures that involve handing over money or other items of value, no matter what the amount is, in exchange for guaranteeing or speeding up the handling of a process or action by any branch of the judiciary, public administration or official body in any part of the world.

Paying, or offering to pay public officials at any level - local, regional, national or international - whether directly or indirectly, to obtain privileged information about a particular tender or to influence the outcome of the award of a contract will constitute a serious breach of the Code of Conduct.

4.11 THEFT OR ILLICIT APPROPRIATION OF ASSETS

The university provides its members with the necessary resources to accomplish their professional activity. The Obligated Parties must make appropriate use of the resources provided to them by UIC Barcelona to carry out the tasks assigned to them.

The misappropriation and improper use of these assets may result in legal prosecution, including minor thefts of office material.

4.12 CORPORATE IMAGE AND REPUTATION

One of the basic elements of the image and reputation of UIC Barcelona is establishing responsible relationships with the local communities in which it carries out its activities. UIC Barcelona considers social trust and reputation to be among their most valuable assets.

Every professional involved needs to put their best efforts into preserving the image and reputation of UIC Barcelona in all of its professional activities, especially in its public interventions. Equally, they have to ensure that users, suppliers and collaborating companies in general also maintain respect for the image and reputation of UIC Barcelona.

4.13 USE OF ASSETS AND RESOURCES

UIC Barcelona provides its members with the necessary resources to accomplish their professional activity. The misappropriation and improper use of these assets will be considered as fraud.

All Obligated Parties must protect the resources of UIC Barcelona and make good use of them in a responsible way. They must protect them and prevent any possibility of them being lost, damaged, stolen or misused which would be prejudicial to the interests of UIC Barcelona.

It will be constitute a serious breach of the Code of Conduct for Obligated Subjects to use UIC Barcelona resources and premises for engaging in activities that have nothing to do with carrying out university business.

For example, employees who, either during their working day or at any other time, make use of UIC Barcelona meeting rooms to hold a private meeting about an activity that has nothing to do with UIC Barcelona and may even be contrary to its interests.

In order to protect the integrity of UIC Barcelona and its professional staff, UIC Barcelona is authorised, at the same time as guaranteeing the dignity and privacy of each professional affected, to implement controls on the correct use of email, the internet and all computer equipment.

Using the corporate email of the University for sending and receiving personal private emails will constitute a breach of this Code, especially when this may have consequences for or adversely affect the university.

4.14 PRIVACY OF INFORMATION

UIC Barcelona collects, stores and manages personal information about professionals, users, suppliers and other people.

Personal data must be processed according to the procedures laid down by UIC Barcelona.

Every UIC Barcelona professional must comply with current legislation regarding the protection of personal data, and they must request and use only the data necessary for the efficient management of UIC Barcelona activities.

It will constitute a serious breach of the Code of Conduct if an employee receives an internal email containing confidential information and then circulates it among other members of the university community, thus publicising confidential data.

Confidential information will be understood to be that which refers to contracts, strategic plans, financial information, employment information, etc.

4.15 APPROPRIATE USE OF IT TOOLS

Employees make use of IT tools (email, intranet, internet, telephone, etc.) in conditions appropriate to the activity of their location and the job functions they fulfil. Their use must not be abused or used for personal gain or for activities that could affect the reputation of image of the university.

Employees may only access the IT systems they are authorised to use and for which they hold the appropriate licences. No type of programme will be installed, used or distributed that may affect system security, nor unauthorised copies made or actions taken that allow in computer viruses.

A violation of the measures provided for in the security document for IT tools will constitute a serious breach of this Code of Conduct: for example, disclosing passwords and access keys to in-house or third party computer systems which could lead to the loss of a great deal of important information; downloading programmes or software that could contain elements harmful to operating systems, give access to dubious websites, copy files and archives contained in USB devices attached to UIC Barcelona terminals or send them to a personal computer, which may result in the loss or theft of these devices or computer and, with them, all of the confidential information stored on them.

Communications that can be sent using IT tools must not contain offensive or defamatory statements.

Users of any IT or communication medium that belongs to the university may not divulge or transmit information that is illegal, sexist, abusive, defamatory, obscene, racist, offensive, pornographic, or any type of information that is offensive or legally unauthorised, whether by means of photos, texts, advertising banners or links to external pages: neither can any other component that is harmful to the integrity of the IT systems or that infringe intellectual property rights be published, broadcast, reproduced, distributed or exploited. Likewise, no material can be published or provided or access given to resources regarding hacking, cracking or any other type of information that UIC Barcelona deems susceptible, even if only potentially, to compromising the security or integrity of the IT systems.

4.16 PROTECTION OF CONFIDENTIAL INFORMATION

Employees must maintain the strictest professional secrecy and keep confidential all the information that they handle in the course of their professional work.

Employees will not be able to access, use or disclose confidential information other than that for which they are duly authorised in writing from their immediate superior. In the event of doubt, and unless indicated to the contrary, employees should consider any information they have access to in the course of their professional activities as being confidential.

In any case, the following rules will apply to the handling of confidential information:

- a) All information will be protected and kept strictly confidential.
- b) Confidential information will only be disclosed and used by the Obligated Party for the purposes assigned to them by their work contract or the relationship that links them to the university. Should the Obligated Party need assistance from a third party and were it required to reveal confidential information to them, the employees would take the necessary measures to ensure that the information remained duly protected, by signing a written and binding confidentiality contract to this effect containing all the guarantees provided for in law.
- c) The information will not be used, totally or in part, for a purpose other than that which the Obligated Party is assigned based on their job role.
- d) The Obligated Party will not disclose, directly or indirectly, information to third parties other than those referred to in the previous section.
- e) The information will not be copied, reproduced or duplicated, totally or partially, without written authorisation from the university.
- f) The Obligated Party will notify, as promptly as possible, any processing or incorrect use of confidential information, cooperating with the university to protect such information.
- g) No Obligated Party will keep information about the university on private computers or other means not provided by the university itself.
- h) In the event that the Obligated Party has to take information off university premises for work purposes or as part of their relationship with the university, this information must be returned once the off-site tasks have been completed.

4.17 COMMITMENT TO SUPPLIERS

UIC Barcelona will not buy goods or contract services from manufacturers or suppliers that do not have ethical and acceptable conditions and practices.

Suppliers that contract or wish to contract products or services with UIC Barcelona must comply with our Code of Conduct, as established in this document.

Any supplier who, in turn, has to contract products and services from another organisation that will end up being supplied to UIC Barcelona must ensure that the conditions of our Code of Conduct are met.

Special emphasis will be given to complying with national and international agreements on every aspect of the Defence of Human Rights, including banning child labour as well as labour discrimination based on race, religion, sex or ideology.

4.18 RESPECT FOR THE ENVIRONMENT

UIC Barcelona undertakes its activities based on respecting the environment, complying with the standards established in current environmental legislation and minimising the impact of its activities on the environment.

It will constitute a serious breach of the Code of Conduct, to the point of even being considered a criminal offence for UIC Barcelona staff, in contravention of laws or other general measures to protect the environment and constituting a grave risk to the balance of natural systems, to be responsible for emissions or the dumping of waste in any unauthorised area.

UIC Barcelona must also ensure that their suppliers comply with international, national or local environmental legislation.

5. ADMINISTRATION AND COMPLIANCE WITH THE CODE OF CONDUCT

(5.1.) The *Compliance Officer* appointed by the Board of Trustees is the competent body within the organisation to oversee and resolve disputes in the way these regulations are applied.

The *Compliance Officer* performs the following functions:

- Ensures compliance with the Code of Conduct.
- Proposes revisions and makes suggestions for amending the Code of Conduct.
- Communicates and circulates the Code of Conduct.
- Assesses and proposes disciplinary measures in the event of non-compliance with the Code of Conduct.
- Prepares an annual management report and then presents it to the Governors' Council and Board of Trustees.

(5.2) The function of Compliance Officer as a single-member body can be assigned to a manager or else to an internal or external professional.

(5.3) The Compliance Officer will present an annual report to the Board of Governors on the progress of policies to prevent criminal risks which will include information on how the policy of internal complaints is working and other relevant activities related to this area.

(5.4) At least once a year, the Board of Governors will assess and supervise the Criminal Risk Prevention Model, unless circumstances dictate shortening the period in response, for example, to a legal reform or any incident arising that warrants it.

(5.5) The Compliance Officer will put forward an annual budget for the finances required to review and update the Criminal Risk Prevention Model which will always include a permanent training plan for employees, management and members of UIC Barcelona.

(5.6) The Compliance Officer will be responsible for putting forward proposals to the Board of Governors for all of the policies needed to implement this Code of Conduct and, in general, to effectively manage criminal risks.

(5.7) In any case, the ultimate responsibility for overseeing the correct implementation of the Compliance Programme lies with the Board of Trustees of UIC Barcelona.

(5.8) Notwithstanding that it is an internal function of the organisation, the compliance function may look to external consultants or even outsource some of the tasks established that arise from the implementation of the Compliance Programme or Programmes.

VALIDITY

This Code of Conduct comes into force on [...], the date of its approval by the UIC Barcelona Board of Trustees as proposed by the Board of Governors on [...]