



Approval	Approval date	Ratification	Ratification date	Version
Executive Committee	10.10.2023	Board of Trustees		1

## **1. MESSAGE FROM THE PRESIDENT OF THE BOARD OF TRUSTEES**

Dear Trustees,

It is with great satisfaction that I present the new code of good practice for the Gran Teatre del Liceu. As President of this institution, I am pleased to share this important milestone in the Foundation's trajectory, which not only involves all our employees, but also all the people connected to the theatre, whether as artists, spectators, collaborators or lovers of culture in general.

Before I continue, I will briefly mention the values that define the Gran Teatre del Liceu Foundation. Our mission is to promote and disseminate the lyrical and performing arts, to consolidate our position as one of the most internationally recognised opera houses. Our activity defines us through values such as artistic excellence, passion, creativity, and so forth. But as an institution we must also be defined by solidarity, commitment to people, honesty and transparency. These values are the basis of our identity and must guide every decision we make.

The importance of this code lies in our determination not to tolerate any form of ethical non-compliance that goes against our aspirations. We want to remain true to our values, and the code of practice provides us with the necessary guidelines to uphold integrity, ethics and accountability in all that we do. This code is not just a formality, rather it represents the high standards of excellence with which we strive to work. Through it, we aim to maintain and enhance the healthy and respectful working environment we have created, while at the same time promoting equality compatible with diversity. Our responsibility is not only to comply with the regulations, but also to exceed them and set new benchmarks in the world of the performing arts.

Through this code, we also want to be an institution that stands out not only for its artistic excellence, but also for its integrity and commitment to the society around it.

We are convinced that the Gran Teatre del Liceu's new code of good practice will help us to improve as an institution. I encourage all of you to learn more about this code. Together we have to build a bright future for the arts and everyone who loves the Gran Teatre del Liceu.

Salvador Alemany President of the Gran Teatre del Liceu Foundation

# **2. INTRODUCTION**

**OBJECTIVES, PURPOSE AND SCOPE OF APPLICATION** 

## PURPOSE

The purpose of the Code of Good Practice is to establish the Foundation's ethical principles, values and essential commitments and determine the behaviour required and expected of all persons linked to the Foundation in one way or another. By establishing these guiding principles, values and commitments, the Foundation commits itself to the highest standards of ethics, integrity and transparency, which will act as a fundamental pillar in the Foundation's management and actions.

Likewise, the Code of Good Practice specifies the fundamental standards of conduct for its users and the behaviour to be avoided.

## **OBJECTIVES**

The main objectives of the Code of Good Practice are:

- To declare the Foundation's values and ethical principles;
- To establish a set of good practices that facilitate coexistence, equality and good treatment among all the parties to which the Code of Good Practice is addressed; and
- To determine the standards of conduct and prohibitions to be observed by all those involved.

The Foundation recommends that this Code of Good Practice becomes the guide for any organisations and institutions that have dealings with the Liceu, and which, either through their management or their links with the Liceu, could have a positive or negative influence on the reputation of the Foundation. The Code of Good Practice is intended to complement the mandatory legal provisions, mainly with regard to guaranteeing their effectiveness in terms of labour relations, transparency, equality, respect for the environment, and other issues covered in this document.

## **SCOPE OF APPLICATION**

This Code of Good Practice will apply to all employees of the Foundation, irrespective of the responsibility or position of the person in question. The scope of the Code of Good Practice also extends to all third parties with whom the Foundation has a commercial or professional relationship, including suppliers, artists, patrons and benefactors, spectators, the media and other third parties. If any person or organisation does not comply with the provisions of this Code, the necessary corrective measures will be adopted and, if this is not possible, the relationship will be terminated.

Similarly, the Code of Good Practice will apply to all activities carried out by the Foundation, regardless of the geographical area in which these take place.

## **3. MISSION, VISION AND VALUES**

## **MISSION**

The Foundation's mission is, in a broad sense, "To inspire, impact and transform societies and people through the Arts, and specifically through opera".

## VISION

The Foundation's vision is to promote and ethically execute all those initiatives that promote and enhance culture. The Foundation, as a public theatre, therefore seeks in the broadest sense: to promote and execute all those initiatives which contribute to the promotion and enhancement of culture, and more specifically, of opera, the cultivation of which is, historically, one of the distinctive features of Barcelona and which has established the Gran Teatre del Liceu as a centre of international renown.

To achieve these aims, the Foundation continuously updates its human, technological, and organisational resources, as well as any others that may be necessary, in accordance with the law.

## VALUES

The Foundation, as an organisation committed to ethical standards, has the following main values:

- Artistic excellence
- Passion
- Creativity, innovation, inquisitiveness and curiosity
- Sustainability
- Quality in balance and efficiency in management
- Accessibility, inclusion and diversity
- Honesty and transparency
- Commitment to people
- Solidarity
- Ongoing improvement

## **4. COMMITMENT TO SOCIETY**

THE FOUNDATION'S COMMITMENT: THE FOUNDATION SEEKS TO MAKE A POSITIVE IMPACT ON SOCIETY THROUGHVARIOUS LINES OF ACTION THAT PROMOTE RES-PECT, SOCIAL RESPONSIBILITY AND INNO-VATION.

### **RESPECT FOR HUMAN RIGHTS**

The Foundation is firmly committed to treating all people fairly and respectfully, while protecting internationally recognised human rights.

This commitment includes, specifically, compliance with the applicable regulations on working hours, pay and working conditions.

The Foundation has zero tolerance for child labour, and the use of illegal, abusive or forced labour.

#### How should I act?

- Assert your human rights as well as those of your colleagues and third parties with whom you interact.
- Speak up when you identify conduct that does not respect human rights and contact the Good Practices Commission with any questions or doubts that may arise in this regard.

## **ENVIRONMENTAL COMMITMENT**

Sustainability is a priority for the Foundation. As a result, the Foundation is committed to developing all its activities in line with good environmental practices and helping to ensure a habitable planet, for our own benefit and that of future generations.

Since 2004, the Liceu has had an Environmental Management System certified under ISO 14001 and the European EMAS (Ecomanagement and Audit Scheme) regulation; since 2013 it has had an Energy Management System certified under ISO 50001 and since 2016 it has held the Spanish Environmental Quality Assurance Label (DGQA). These certifications and environmental seals make the Liceu an example in the process of continuous environmental and energy improvement within the culture sector.

More specifically, the Foundation's environmental objectives comprise, among other things:

- To create more sustainable, ecological and reusable scenery and costumes
- To maintain water consumption
- To reduce power usage for air-conditioning and stage lighting
- To maintain the ratio of waste collected.

The Foundation's intention is to continue to make progress in environmental and strategic sustainability, maintaining its commitment to the current Environmental and Energy Policy.

#### How should I act?

- Attend the training actions that are given on environmental issues.
- Be an active part of the change: reduce the amount of waste you generate; reuse and recycle.
- Print only when strictly necessary and in black and white.
- Turn off lights and computing devices at the end of your working day.

### **SOCIAL ACTION**

The Foundation is committed to social causes and the general benefit of society, so that it can enjoy and participate in opera, performance and dance, among other cultural expressions that may be promoted.

Furthermore, the Foundation is an organisation that is sensitive to everything related to improving people's lives through art, especially music, and participates in initiatives in many different fields and collaborates with associations and other foundations to help incorporate this facet as long as these foundations can continue to carry out their main function.

In line with "The Liceu for all", and with the desire to be an institution that generates opportunities, knowledge and experiences for everyone, the Liceu develops its educational and social project. The Foundation is committed to the educational and social community, providing tools to help students, teachers, families and vulnerable people gain access to culture. The Liceu guarantees accessibility to the theatre and its programme for everyone. And it promotes activities that contribute to improving the lives of all people.

Social action not only includes the area related to the theatre's own activity, but is incorporated into all aspects of the organisation and throughout its value chain. The Liceu is an inclusive institute that considers the most vulnerable people

#### How should I act?

- Support the social activities and projects promoted by the Foundation.
- Ask the Good Practices Commission about any questions you may have.
- Contribute by proposing improvements that drive forward an inclusive organisation
- Speak up if you consider that any of the aspects indicated could be improved, or even use the appropriate channels if you identify any conduct or process within the organisation that is not aligned with what is indicated in the code of good practice

#### INNOVATION

Innovation is part of the Foundation's DNA.

The Foundation clearly has a cutting-edge and contemporary profile, positioning itself as a space for creativity, curiosity and musical and cultural talent. It is therefore committed to pursuing its objectives by focusing on modernity and creativity, and by contributing to musical and cultural development.

However, an innovative organisation also reflects this in its processes, procedures and tools that further the institution's digital transformation (in terms of management, scenography and audiovisual tools).

#### How should I act?

Contribute to innovative projects and promote creativity and artistic curiosity within the Foundation.

Adopt an intrapreneurial attitude by improving processes that facilitate the organisation's work or by proposing new ways of working in an innovative way, whether or not this includes the use of technology, which facilitates day-to-day work, efficiency and productivity



# 5.COMMITMENTS TO PEOPLE AND ALL STAKEHOLDERS

THE FOUNDATION'S COMMITMENT: THE FOUNDATION PUTS PEOPLE AT THE HEART OF ITS WORK, CONTRIBUTING TO THE CREATION OF A SPACE WHERE TOGETHER WITH THE STAKEHOLDERS (ARTISTS, EM-PLOYEES, CLIENTS, SEASON TICKET HOL-DERS, BENEFACTORS, SUPPLIERS, PEOPLE WORKING IN THE PUBLIC AUTHORITIES, BOARDS OF TRUSTEES, GOVERNING BO-DIES...) CAN FREELY DEVELOP THEIR PRO-FILES, IN A SAFE AND EQUITABLE MANNER, AND ALWAYS WITH RESPECTFUL, KIND AND HUMANE TREATMENT.

## RELATIONSHIPS BASED ON TRUST AND RESPONSIBILITY

The relationship between the Foundation and its employees and artists is based on mutual trust and responsibility. The Foundation establishes principles and values that promote a respectful and healthy working environment, and it is the responsibility of the employees and artists to put these ethical principles and values into practice, and to report any breaches of them.

Likewise, the Foundation trusts in the integrity, honesty and transparency of its employees and artists and is committed to acting in the same manner towards them.

The trust and responsibility that unites the Foundation and its staff and artists is, and must inevitably be, reciprocal, to create a common project that benefits everyone.

#### How should I act?

- Act with integrity, honesty and professionalism towards your colleagues and the Foundation: do not violate the trust that the Foundation places in you.
- Make sure you find the work formula that best suits your priorities and professional goals.
- Contact the Human Resources Manager if you have any questions or concerns.

## HEALTH AND SAFETY AT WOR AND ON SITE

The Foundation protects the physical and mental health of its employees and artists, guaranteeing the safest working conditions for all of them. In this regard, the Foundation is committed to complying with its legal and contractual obligations in terms of occupational risk prevention and requires the same commitment from contractors.

The protection and well-being of minors must be prioritised at all times, and they must be adequately protected in the event that they participate in shows or other Foundation activities.

#### How should I act?

- Act responsibly and in compliance with the regulations on occupational risk prevention and remember that your individual behaviour influences our brand and the safety of other employees and artists.
- Comply with all the procedures and protocols established to guarantee your health and safety and that of your colleagues in the workplace.
- Actively participate in the Foundation's initiatives aimed at establishing a culture of prevention.



### EQUALITY, DIVERSITY AND INCLUSION

The Foundation guarantees equal opportunities and treatment regardless of ethnic origin, gender, ideology, religion, sexual orientation and/or any other circumstance.

Likewise, the Foundation promotes the diversity of people, perspectives, talents and experience as the main factor in achieving the excellence, creativity and innovation sought in all its actions.

Equality, diversity and inclusion among all people is one of the fundamental pillars for achieving the Foundation's mission and promoting its vision and values.

#### How should I act?

- Actively participate in the integration of employees and artists with whom you collaborate.
- Treat everyone with respect.
- Contact the Head of Human Resources or the Good Practices Commission if you identify conduct that is not in line with the Foundation's values, that affects you personally or someone else, or if you have any doubts.

## NO DISCRIMINATION OR HARASSMENT

The Foundation's professionals, including the artists, are selected, recruited and promoted according to their qualifications and abilities.

All the artists and staff are obliged to avoid any kind of discrimination and to facilitate respectful and collaborative treatment.

The Foundation will not tolerate any kind of discrimination or harassment in the professional or personal environment.

#### How should I act?

- Avoid making comments that may be offensive to the Foundation's staff and artists, and speak up if you witness or know of any discriminatory situations towards any person.
- Listen and give your opinion in a respectful and polite manner.
- Contact the Head of Human Resources or the Good Practices Commission if you suspect or become aware of a situation of discrimination or harassment, whether it involves you or another person in the Foundation.
- If you detect any improper behaviour, report it to the Head of Human Resources or the Good Practices Commission in order to avoid possible harm. Any behaviour that is not respectful of people needs to be addressed in order to achieve an organisation full of good people with good intentions.

## 6. COMMITMENTS TO THIRD PARTIES WITH WHOM THE FOUNDATION HAS RELATIONSHIPS

THE FOUNDATION'S COMMITMENT: TRANSPARENCY AND HONESTY ARE TWO ESSENTIAL ASPECTS OF THE FOUNDA-TION'S RELATIONSHIP WITH THE THIRD PARTIES WITH WHOM IT HAS DEALINGS.

Honesty in relationships with suppliers, agents, patrons and benefactors, spectators, the media, organisations and institutions with which it collaborates and other third parties

The Foundation undertakes to treat all suppliers, artists, collaborators, spectators and other third parties with whom it comes into contact with total professionalism, transparency, honesty, loyalty and respect, always providing them with truthful information and data. This commitment includes a positive attitude of cooperation with the people and organisations that relate to the foundation.

#### How should I act?

- Act with professionalism, commitment, and a collaborative spirit in your dealings with any third party with whom you interact.
- Do not disseminate false or misleading information about the Foundation or any aspect related to it.
- Do not disseminate information not authorised by the Foundation by any means or to persons outside the institution.

## **SUPPLIERS**

The Foundation's suppliers are a strategic partner and key to its success.

The Foundation promotes long-lasting and mutually beneficial relationships with these third parties, based on respect, trust and transparency.

Objectivity will be guaranteed when selecting the companies, organisations and persons to collaborate with the Foundation, taking into account criteria of quality, competitiveness, price and service, in accordance with the applicable public sector regulations in force. Its social values of equality and diversity, as well as its commitment to the environment, must also be observed. Under no circumstances may members of the Foundation receive from their suppliers any remuneration or benefit for the services deriving from their professional activity, nor any benefit that unfairly favours them over other suppliers.

It will be ensured that the activities of the suppliers with whom the Foundation collaborates comply with the provisions of this Code of Good Practice.

#### How should I act?

- Be careful in your relations with suppliers and collaborating companies with which you may interact, promote trust and transparency.
- Inform the Good Practices Commission of any doubts or incidents of which you are aware.

## **CLIENTS AND SPECTATORS**

The Foundation facilitates the greatest possible accessibility to its programmes and services to everyone, proposing inclusion and leaving no one out. It ensures equal access to the artistic offer and other activities promoted by the Foundation without any kind of privilege or priority, except for the order of demand.

Client and spectator loyalty is vital for the Foundation, including both locals and visitors.

#### How should I act?

Participate in the mediation and outreach activities with clients and spectators within your area of activity.

### **PATRONS AND BENEFACTORS**

The Foundation is committed to outreach to all the theatre's stakeholders, by actively seeking support from organisations that make up the country's economic and social fabric and from individual and corporate sponsors.

Furthermore, it ensures that the activities of the organisations, companies and individuals who make contributions do not contradict the provisions of this Code of Good Practice.-

#### How should I act?

Strengthen, increase and consolidate the relationship with the Foundation's patrons and benefactors within your field of action.

#### **THE MEDIA**

The Foundation undertakes to act responsibly when expressing opinions, especially in the conventional and social media, respecting the reputation of the Foundation and preserving confidentiality in all cases. Likewise, relations with the media are handled only by the individuals assigned this task and in the areas in which their competence lies.

Acting responsibly when expressing opinions in the conventional and social media is essential for preserving the Foundation's brand and image.

#### How should I act?

- Refrain from expressing opinions publicly on behalf of the Foundation.
- Avoid disclosing confidential Foundation information to which you have access as a result of your professional relationship with the Foundation.
- Check the Gran Teatre del Liceu's Manual for the ethical use of personal social media by staff for more details on good practices when using social media, and/or contact the Communications Department if you have any questions.



## OTHER INSTITUTIONS IN THE SECTOR

The Foundation cooperates with other theatres and organisations in an open and transparent way, exchanging information, knowledge and essential resources.

#### How should I act?

Facilitate cooperative relationships with professional teams from other theatres and organisations in the sector within your field of technical and professional specialisation.

The Foundation will promote and apply favourable conditions to artistic staff within its scope, so as to enhance and dignify careers in the sector.

## 7. INTEGRITY IN COLLABORATION AND ACTION WITH THIRD PARTIES

THE FOUNDATION'S COMMITMENT: INTE-GRITY AND ETHICS IN ACTION AND CO-LLABORATION WITH THIRD PARTIES ARE VITAL FOR THE FOUNDATION SO THAT IT CAN ACHIEVE ITS MISSION.

## **CONFLICTS OF INTEREST**

The Foundation is committed to managing all conflicts of interest, taking into account both the interests of the Foundation and those of professionals, adopting all measures necessary to prevent and detect situations of conflict that may affect the image of the Foundation and the trust placed in it by third parties.

## What is understood by conflict of interest?

A situation in which an action or decision of the Foundation may be influenced by a particular interest of a Foundation employee, or of a third party with whom there is a personal relationship.

Examples of situations in which a conflict of interest may exist or arise:

- The contracting of services provided by a relative or friend without disclosing the relationship to the Foundation.

- Using one's position at the Foundation to pursue commercial or professional opportunities for direct or indirect personal gain.

#### How should I act?

- Use objective criteria for any professional decisions you may make in relation to the Foundation.
- Immediately inform the Good Practices Commission if you are involved in a situation where there is a conflict of interest so that you know how to act.

## COMBATING CORRUPTION AND FAVOURITISM

The Foundation rejects any corrupt behaviour that may harm it or of which it becomes aware, and undertakes to act at all times with integrity, transparency, ethics, and rigour and to do business only with third parties that share the same anti-corruption standards.

The Foundation will not make, either directly or indirectly, any contributions to political parties, their representatives or candidates.

The Foundation has zero tolerance for corruption and is committed to strict compliance with the regulations on the prevention and fight against corruption.

## What practices can be considered acts of corruption?

- Donations, sponsorship or patronage for corrupt or illegal purposes, or for the purpose of improperly influencing a decision.



- Influencing the actions of a public official, civil servant or public authority, through a personal relationship, for financial gain.

- Making payments, even of small amounts, to officials, in a broad sense, to secure or expedite a process (e.g., processing a licence, permit, etc.). These are called facilitation or process payments and are intended to speed up or secure a routine institutional action. - Accepting a payment or benefit of any kind in exchange for unduly favouring one supplier over another.

#### How should I act?

- Refrain from giving gifts or hospitality that could be construed as intended for an illegitimate purpose or which are intended for government officials.
- Do not make payments or give any other form of consideration on behalf of the Foundation to unfairly favour the Foundation.
- Review the Foundation's Anti-Corruption Policy for further details on the principles of conduct and prohibited conduct for employees.
- Do not give gifts of tangible or intangible assets from the Foundation that have a financial value for direct or indirect personal gain. Always follow the Foundation's code of ethics and anti-corruption policy.

#### **FREE COMPETITION**

The Foundation is committed to respecting the principle of free competition in the markets and the applicable competition law. The Foundation supports a free and fair market with a level playing field and rejects access to market and competitor information by illicit means.

# TAXATION AND FINANCIAL INTEGRITY

The Foundation respects general accounting principles, reflecting its financial, asset and economic reality in a truthful and transparent manner.

#### How should I act?

Provide clear and realistic accounting and financial data for the Foundation that you can share with the staff in charge of managing this data.

## TRANSPARENT MANAGEMENT OF RESOURCES

The Foundation will ensure that all resources from the development of its activity [fees from members and collaborators, donations, sponsorship and so on] are obtained in accordance with transparent, objective and reviewable criteria.

In particular, the Foundation is committed to the diligent and transparent management of the public resources allocated to it, guaranteeing accurate and complete information on the Foundation's activities, as well as explicitly stating the rigour, efficiency and maximum return on resources.

#### How should I act?

- Avoid sharing misleading or false information about the Foundation's activities and how the resources obtained by the Foundation are used.
- Regularly submit the financial results to the competent bodies in a clear and comprehensible manner and in accordance with the principles of transparency.

#### **MONEY LAUNDERING**

The Foundation undertakes not to engage in practices that may be considered irregular in its dealings with third parties, including those related to money laundering.

It will ensure compliance with the applicable national and international regulations and provisions in force in the fight against money laundering and the financing of terrorism.

#### When does money laundering occur?

Money laundering occurs when money or any other asset originating, directly or indirectly, from criminal activity is put into circulation or any act is undertaken to conceal its illicit origin or to help the person who has participated in the offence to evade the legal consequences of their actions.

#### How should I act?

- Be vigilant and be wary of unusual payments; check that payments made to or by third parties match the person in whose name the invoice is issued.
- Immediately notify the Good Practices Commission of any event or transaction for which there is an indication of money laundering.

## 8. CO-RESPONSIBILITY BETWEEN THE LICEU AND ITS STAKEHOLDERS

THE FOUNDATION'S COMMITMENT: THE FOUNDATION CONSIDERS IT A SHARED RESPONSIBILITY WITH THE ORGANISA-TIONS WITH WHICH IT COLLABORATES TO MAKE APPROPRIATE USE OF ASSETS AND RESOURCES, AVAILABLE DATA AND ANY OTHER ELEMENTS OVER WHICH THIRD PARTY RIGHTS ARE HELD.

## USE OF FOUNDATION ASSETS AND RESOURCES

The Foundation provides its employees with the tools necessary for the proper performance of their duties. We must all use them responsibly and in accordance with internal policies and regulations to ensure the security of the Foundation's information technology assets and systems, in order to protect information from unlawful use, misuse and access, damage, deterioration, theft and loss.

#### How should I act?

- Ensure proper use of the resources and any assets of the Foundation, including its facilities.
- In case of damage, theft, loss or unauthorised access to any work tool provided by the Foundation or to confidential information, business secrets or personal data, report this immediately to the IT department.

## INTELLECTUAL AND INDUSTRIAL PROPERTY

The Foundation is committed to respecting intellectual and industrial property rights, both its own and those of third parties, especially the rights of third parties that may relate to artistic works.

#### What does intellectual and industrial property law protect?

Intellectual property protects original literary, artistic and scientific works, including musical compositions, audiovisual works and dramatic works, among other things.

Industrial property includes trademarks, designs, trade secrets and patents.

#### How should I act?

Avoid using materials or other resources that are protected by intellectual or industrial property rights without the relevant permission to do so.

### CONFIDENTIAL INFORMATION AND TRADE SECRETS

The Foundation will ensure that only authorised persons on a need-to-know basis have access to confidential information and that they use it responsibly. For this reason, the Foundation puts in place security measures to protect all confidential information and business secrets, in whatever medium, against any risk, accident or manipulation.

#### What is meant by trade secrets?

A trade secret can be any type of information or knowledge that has a value that we do not want competitors to know and is therefore kept secret.

#### How should I act?

- Make sure you identify and properly manage confidential information you may have access to and share it only with strictly necessary persons.
- Comply with any measures that may be put in place at the Foundation to safeguard confidential information.

## DATA PROTECTION AND PRIVACY

The protection of confidential, secret and personal data is one of the Foundation's guiding principles in its relations with professionals, artists, spectators, suppliers and other third parties.

The Foundation collects, processes and uses personal data only to the extent necessary for defined, clear and legitimate purposes and in compliance with data protection law.

The Foundation will ensure that professionals comply with their obligations with regard to the legal provisions on the protection of personal data as well as legal and company regulations on information security.

#### How should I act?

- Never share your password for accessing the Foundation's systems.
- Please take into account the obligations arising from the data protection regulations that apply to you, and try to share the personal data of third parties to which you have access as little as possible, with as few people as possible.

## 9. THE GOOD PRACTICES COMMISSION

The Foundation's Good Practices Commission is an internal body with independent initiative and control powers, responsible for supervising, among other things, the operation and compliance with the Crime Prevention Model.

Within the scope of its functions, the Good Practices Commission has supervisory powers over all the Foundation's employees, and is equipped with the appropriate financial, human and technological resources necessary to carry out its functions.

Among other functions regulated in the Regulations, the Good Practices Commission is responsible for: (i) supervising the correct application of this Code of Good Practices and other internal regulations; and (ii) receiving, responding to and processing queries and irregularities relating to this Code of Good Practices received via any channel.

## **10. QUERIES AND REPORTING OF IRREGULARITIES**

## QUERIES

#### If in doubt, ask first, act

The Foundation encourages all its employees to express their doubts or concerns.

In the case of doubts relating to the Code of Good Practices or other regulations applicable to the Foundation, contact the Good Practices Commission.

The Good Practices Commission will redirect queries to the appropriate departments.

## We are here to help you, please get in touch!

### REPORTING

If you know of or suspect any inappropriate behaviour or any situation that contravenes the Code of Good Practice, internal regulations, the law or the ethical values of the Foundation, **please report it:** 

- Through the Ethics Channel
  - or
- To your line manager

The Foundation's Internal Information System complies with the rights and guarantees of the parties involved, preserving, among other things, guarantees of proportionality, non-reprisals, presumption of innocence and privacy.

Note: "How should I act?" aims to describe through examples the attitude and behaviour that both individuals and the organisation should adopt in the face of the various commitments that the Foundation makes through the Code of Good Practice. This section outlines some ideas on how to act in certain situations. These are by no means the only ways to proceed, although some of the examples given may be the most relevant.



## 11. APPROVAL, MODIFICATION AND ENTRY INTO FORCE OF THE CODE

## **APPROVAL AND MODIFICATION**

This Code of Good Practice has been approved by the Board of Trustees. Any modification and/or updating of the content of this Code of Good Practice must also be approved by the Board of Trustees.

## **ENTRY INTO FORCE**

The Code of Good Practice enters into force on 10/10/2023