

## CODE OF CONDUCT

The following document describes the basic principles of conduct that Fundación Educación Para el Empleo (EFE-Europe) has adopted in regarding all its employees.

EFE-Europe's employees must comply with the policy described below, as it is a key guiding principle in the performance of our activities and it reflects to the institutional image we want to portray in the non-profit sector.

This document must be given to every person joining the organization, alongside the Employee's Manual.

### 1. INTEGRITY

- a. We must be accountable for our behaviors and responsibilities, acting with honesty towards external and internal actors.
- b. No degree of doubt about our honesty, transparency, and moral values can be allowed, which must be achieved through unparalleled behavior.

### 2. PROFESSIONAL BEHAVIOR

- a. We must comply with the law and with the policies and norms established by the organization, with the aim to avoid situations which may negatively affect the image of the organization, the non-profit sector, or the people we work with.
- b. We assume irrefutably and with professionalism our role within the organization, promoting at all times the relevance and social impact of our mission.
- c. We discuss the decisions that have been made in an ethical, balanced, constructive, and impartial manner; maintaining the beneficial spirit for the organization and for its employees.

### 3. CONFIDENTIALITY, PRIVACY AND DATA PROTECTION

- a. We must ensure that the information we deal with at work is protected, and that it strictly complies with the Spanish Data Protection Law (Ley Orgánica de Protección de Datos). The law must be applied more extensively and firmly when the information we dealt with is private and confidential.
- b. We process the information we are provided cautiously and with common sense, applying the privacy criteria of the organization strictly. If any doubt regarding these criteria arises, we should approach the executive body of the organization for clarification.

- c. We should not reveal confidential or personal information, except if there is an explicit authorization from the executive body, or if the action is supported by law or the professional duty.

#### 4. REGARDING OPINIONS, DIVERSITY/ IMPARTIALITY

- a. We promote a respectful and egalitarian attitude towards our colleagues and the rest of the people we interact with, regardless of their origin, culture and gender.
- b. We promote and value diversity, applying norms regarding equity and equal opportunities, and highlighting team members' capacities and talent.
- c. We do not tolerate harassment or discrimination of any kind towards any employee and we condemn those acts that can be qualified as such in our professional environment.
- d. We listen and respect all employees' opinions and we do not impose our own unilateral criteria. Instead, we adopt a conciliatory attitude open to dialogue, taking into account other people's point of views and experiences.

#### 5. ANTICORRUPTION

- a. We do not accept corruption or bribery under any circumstances, neither from us, nor from third parties on our behalf.
- b. We condemn any activities liable to corruption.

#### 6. CONTACT WITH SUPPLIERS AND EXTERNAL ENTITIES

- a. We do not accept any dishonest behavior from our suppliers or collaborators.
- b. We comply with our procurement procedure when hiring a specific service.

#### 7. CONFLICT OF INTEREST

- a. We do not support activities or decisions that may be questionable, or that might have been made exclusively as a result of personal connections or favors.
- b. We condemn prejudices and conflicts of interest that may be affecting the image of the organization.

#### 8. OTHER

- a. We respect our professional dress code, bearing in mind that the concept "casual" does not allow for inappropriate clothing. We avoid dirty and offensive clothes.

- b. We respect the organization's facilities and comply with office rules, such as those indicating the proper use of restrooms, kitchen, energy-saving, etc.

Complaints and suggestions are active mechanisms for employees' participation in the improvement of the organization's functioning, and their direct feedback regarding situations that do not meet their expectations.

They are processed through a mailbox situated in front of the restrooms. These complaints and suggestions could be anonymous or not. The Director of Operations and Programs, together with the Compliance Officer, will open the mailbox on a bimonthly basis and will analyze the different petitions submitted. Depending on the severity of each of them and their impact, the Director will decide to send them to the Chief Executive Officer for his consideration.

During weekly meetings, the Director will make public to the team those complaints and suggestions he consider relevant and will share possible conclusions or actions that may be put in practice.