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## **CODE OF CONDUCT**

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Social Promotion Foundation

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## 1) INTRODUCTION

1.1) The Social Promotion of Culture Foundation (hereinafter, Social Promotion) is an organization of a foundational nature, constituted non-profit, whose assets are permanently affected to the realization of general interest purposes essentially related to the promotion and development of cultural, welfare, social and educational activities in Spain and abroad, mainly in the developing countries and depressed regions of other countries, in order to cooperate in its cultural, social and economic development.

It is included among the entities regulated by the Law of Foundations of Activities of General Interest and classified and registered in the Registry of Foundations of the Ministry of Education, Culture and Sport with the registration number 114.

The territorial scope in which it mainly develops its activities is not limited to that of a specific Autonomous Community but extends to all those that are integrated into the Spanish State, therefore from the technical-legal point of view, it is a foundation of state competence.

1.2) Social Promotion has as its mission:

- Pay special attention to programs and projects of a formative nature, because it understands that training, in its broadest sense, is the motor for a human and lasting development in people and in social groups.
- Promote all types of initiatives aimed at the protection and social integration, in any possible way, of persons who, regardless of their age or sex, are in a situation of need because they are minors, illness, disability or incapacity of any kind or class, including the development of training and/or retraining plans aimed at employed and unemployed people, entrepreneurship and socio-labor insertion of young people and other groups.
- Promote the promotion of equal opportunities between men and women.

1.3) Without prejudice to the respect of the freedom of expression of every person, will not consent, facilitate, promote, disclose, or protect act or expression that supposes or entails any incitement to violence against any group because of race, religion, sex or beliefs.

1.4) The Foundation, as a Development NGO, has also signed a Code of Conduct promoted by the Coordinator of Development NGOs, whose content is common to all national development NGOs and which includes a series of common elements of all of them, such as their signs of identity and its distinctive features.

None of the articles contained in this Code of Conduct, own and exclusive of Social Promotion, contradicts, opposes or violates any of the principles included in the common and general code referred to in the previous paragraph.

## 2) SCOPE OF APPLICATION

2.1) This Code of Conduct is addressed to the Employers, managers, employees, and independent professionals who provide their services in Social Promotion, which in the future will be referred to *as the members or collaborators*.

- 2.2) Notwithstanding the foregoing, Social Promotion shall promote that all persons (in particular, volunteers), companies, administrations and institutions with which they are related in the actions of its corporate purpose, adopt a behavior in accordance with the rules contained in the present Code.

It will not hire, nor maintain commercial or institutional relations with any person, company or authority that violates the principles contained in this code of conduct.

- 2.3) No one, regardless of their level or position, is authorized to request that a collaborator commits an illegal act or that contravenes the provisions of this Code of Conduct.

### **3) OBJECTIVE**

- 3.1) This document sets out the set of rules that apply to all employees that make up Social Promotion and that are valid to establish not only guiding parameters of the Foundation's corporate culture, but also its rules of action.

Additionally, the Code of Conduct responds to the new obligations of criminal prevention imposed in the area of criminal liability of legal persons.

- 3.2) Social Promotion aspires that its behavior and that of the people linked to it respond and adapt, to the current legislation, to ethical principles and to principles of social responsibility of general acceptance.

### **4) INTERPRETATION OF THE CODE OF CONDUCT**

Any questions that may arise about the interpretation of the Code of Conduct should be consulted with the immediate superior. If circumstances require it, the Compliance Committee will be directly approached.

### **5) GENERAL RULES OF PROFESSIONAL CONDUCT**

- 5.1) Employees will strictly comply with current legislation, in accordance with the spirit and purpose of the regulations, and will observe the provisions of the Code of Conduct.

Likewise, they will respect in full the obligations and commitments assumed by Social Promotion in their contractual relations with third parties.

In their activity, they will always behave diligently, honestly and loyally.

- 5.2) The Board of Trustees and the Social Promotion executives must know particularly the laws and regulations, including internal ones, that affect their respective areas of activity and must ensure that employees, volunteers or external professionals who are hired and who depend on them receive the adequate information and training that allows them to understand and comply with the legal and regulatory obligations applicable to their function, including internal ones.

The effectiveness of the regulatory compliance programs, as well as the internal operating rules of Social Promotion, require the unequivocal commitment and support of the board of directors and the executives so that they will scrupulously comply with it, thus translating the compliance culture, and will demand from the rest of collaborators equal conduct.

Never any conduct that departs from strict compliance with the Law and internal regulations will be rewarded or incentivized, directly or indirectly.

- 5.3) Social Promotion will respect and abide by the judicial or administrative resolutions that are dictated, reserving the right to appeal them if they understand that they do not comply with the law.
- 5.4) The guiding criteria to which the behavior of the collaborators will be adjusted will be integrity and professionalism.
- 5.5) It is the obligation of all members of Social Promotion to inform the Compliance Committee about the initiation, evolution and result of any judicial procedure of a penal or administrative order of a sanctioning nature, in which they are investigated, prosecuted, accused or convicted and may affect them in the exercise of its functions in Social Promotion or harm the image or interests of the entity.
- 5.6) In response to the educational and formative mission of Social Promotion, all public manifestations, whether oral or written, that foments, promote or publicly incite hatred or discrimination of a certain group or person for reasons of race, religion, belief or sexual identity are repudiated and rejected. Therefore, it requires all the members and collaborators of Social Promotion that in the development of their tasks, comply with and respect this principle. Consequently, they are strictly prohibited, through the web, the publications, conferences, seminars, book presentations, training courses, activities with minors, or any other activity organized by the Foundation, the public defense, recommendation, sale, or promotion of books, texts, films, or discourses that encourage, promote, or incite hatred or discrimination against a group or person, for racist, anti-Semitic, or others, related to ideology , religion or beliefs, family situation, sex, orientation or sexual identity, for reasons of gender, illness or disability.

## 6) RULES OF CONDUCT

### 6.1) Relationship with customers

- 6.1.1) Honesty and professional responsibility: Social Promotion fulfills a high commitment of honesty and professional responsibility in its task.
- 6.1.2) Contracts and promotional activity: The professionals of Social Promotion will comply with the following behavior guidelines in the activity of offering and contracting services of the Foundation:
  - They will objectively inform about the different services.
  - The current rates or the commercial conditions approved in each case will apply.
  - They will take care of the socioeconomic situation of the client and his family, studying alternative solutions when the resources of the client and his family are scarce. In case of need, they will ask the Management the possibility of a full or partial scholarship so that the economic aspect is not limiting when it comes to providing a service.
  - They will take care that the contracting of the services is done in the manner established in the internal procedures, obtaining and preserving the required documentation and delivering a copy of it to the person who hires.

- The Social Promotion contracts must be (i) clear and direct so that the parties have all the relevant information for making decisions, (ii) in accordance with the regulations in force, without resorting to deceptive practices or in any way, incorrect and (iii) complete, so that the parties know their rights and obligations.
- Social Promotion undertakes not to use deceptive or false advertising tools. All promotion activity of the Foundation, marketing, information and sale of the training or educational courses that it imparts must be done with the offering of all the relevant information so that its potential clients adopt their informed decisions.
- The information about its activity, and different programs and courses is on its web page (<https://www.promocionsocial.org>) in which useful information for its clients is exposed.

6.1.3) Confidentiality and privacy: The information of the clients must be treated with absolute discretion and confidentiality, and will only be provided to their legitimate owners or under official requirements always with due legal guarantees.

## 6.2) Relationship with minors

The Foundation promotes and organizes numerous courses, programs and activities aimed at minors.

In the development of these tasks, the Foundation respects and fulfills the right to honor and to their own image, right to information, freedom of expression, ideological freedom and other rights recognized in Organic Law 1/1996, of January 15, legal protection of minors, always watching over their best interests.

It will be a requirement for access and exercise to activities that involve regular contact with minors, not having been convicted by a final sentence for any crime against freedom and sexual indemnity, which includes sexual assault and abuse, sexual harassment, exhibitionism, and sexual provocation, prostitution and sexual exploitation and corruption of minors, as well as trafficking in human beings. To this end, anyone who intends to access such activities must prove this circumstance by providing a negative certification from the Central Registry of sex offenders.

## 6.3) Relationship with donors

### 6.3.1) True information

Social Promotion provides accurate and truthful information about the destination of the funds, distinguishing the amounts applied to the financing of the programs, from those destined to administrative expenses and those dedicated to raising funds.

Social Promotion promotes transparency in relation to its donors and publishes on its website the corresponding report for each annuity (<https://promocionsocial.org/somos-transparentes/>).

### 6.3.2) Rights of donors

Social Promotion respects the will of its donors without modifying or applying their contributions to a destination other than that stated by them, without having their express authorization.

Social Promotion respects the right of confidentiality of its donors without disclosing information about them, unless they have their authorization, safeguarding compliance with legal obligations, particularly those related to the prevention of money laundering.

Social Promotion will seek, within a maximum period of ten calendar days (except for exceptional circumstances) a response to the additional information demands of its donors.

Social Promotion will issue a donation certificate, duly communicating it to the competent Tax Administration for tax relief, provided that they are provided by the donor with the necessary data to do so.

#### 6.4) Relationship with volunteers

6.4.1) Purpose: The incorporation of volunteers has a purpose of selfless and altruistic support.

6.4.2) Prerequisites: It will be an essential requirement to have the status of volunteers in programs whose exercise involves habitual contact with minors, not having been convicted by a final sentence for crimes against freedom and sexual indemnity, trafficking and exploitation of minors, for which will require the contribution of the corresponding negative certificate of criminal record.

Likewise, persons who have a criminal record not canceled for crimes of domestic violence or gender, for attempting against the life, physical integrity, freedom, moral integrity or sexual freedom and indemnity of the other spouse may not be voluntary. or of children, or for crimes of illegal traffic or clandestine immigration of persons, or for crimes of terrorism in programs whose recipients have been or may be victims of these crimes. This circumstance will be accredited through a responsible declaration of not having a criminal record for these crimes.

6.4.3) Functions of volunteering: Social Promotion previously defines the functions of the volunteers and the area in which they must act, never entrusting tasks of the Foundation's professionals.

6.4.4) Incorporation agreement: the rights and obligations of the volunteers are reflected in the incorporation agreement, which must be signed and must include the specific work of the volunteer.

6.4.5) Training: Social Promotion provides volunteers with adequate training to fulfill their role, through the training activities offered regularly.

6.4.6) Confidentiality: Social Promotion must instruct the volunteers who will be obliged to fulfill the commitments acquired with it and must keep when appropriate, confidentiality of the information received and known in the development of their activity. Social Promotion must also instruct them that in no case will they take photos or videos of the activities they develop without authorization from the Foundation itself.

#### 6.5) Relationship with local counterparts

The Foundation understands by local Counterpart, the organization with implantation in the country where a project is going to be executed, that will assume before Social Promotion, and in

collaboration with this, the responsibility of identifying, executing and giving continuity to the project.

The main criteria to be able to select a Counterpart will be:

- Social implantation and knowledge of the reality where you want to work. This implementation may be in a specific area or throughout the country.
- Technical capacity demonstrated by the experience in carrying out other projects analogous to the one proposed.
- Management capacity to carry out projects of the amount and complexity analogous to the one proposed.
- That there is an affinity between the Mission, Vision, and Values of the two entities.
- The entity Counterpart receiving funds provided by the Foundation must have among its specific purposes the realization of activities of general interest related to the purposes set out in the statutes of the Foundation.
- Hold the condition of the non-profit organization.
- It must be legally constituted and registered in the corresponding registry and prove, before the signing of any agreement or granting of any type of aid, the designation legally confirmed by the individual representing it.
- It must certify that they are subject to the administrative and fiscal controls proper to their national legislation.

For the selection of a local counterpart, the Foundation will comply with the provisions of the Accreditation Procedure for the suitability of local Counterparts approved by the Foundation.

## 6.6) Relationship with suppliers of goods or services

### 6.6.1) Choice of providers:

The processes of choosing suppliers of goods or services should be characterized by the search for competitiveness and quality, guaranteeing equal opportunities among all suppliers.

In particular, from Social Promotion no one will be denied who, fulfilling the requested requirements, can compete in the contracting of products and services, adopting in the election among the candidates objective and transparent criteria.

In the event that the supplier, in the development of its own activity for Social Promotion, adopts behaviors that do not comply with the general principles of this Code of Conduct, Social Promotion will be entitled to take the appropriate measures, and may reject collaboration in the future with said provider.

Relations with suppliers are regulated by common principles and are subject to rigorous quality control, compliance and excellence by Social Promotion.



The formalization of a contract with a provider must always be based on clear relationships, in writing and avoiding forms of dependency.

#### 6.6.2) Independence: conflicts of interest:

Any economic, family or friendship relationship of a collaborator with a supplier will be immediately revealed by the employee concerned, who must refrain from any action in relation to the operation in which he has a conflict of interest, complying with the Protocol to that effect has written the Foundation.

#### 6.6.3) Presents, gifts and favors:

It is forbidden to receive presents, gifts or favors from third parties that may influence the independence of Social Promotion decisions.

Consequently, the acceptance of a gift by Social Promotion from a supplier of goods and services will only be allowed when concurrently each and every one of the following three circumstances:

- They are of symbolic economic value or promotional nature.
- They respond to usual standards of courtesy or usual commercial attention.
- They are not prohibited by law or generally accepted business practices.

In no case may they consist of cash.

#### 6.6.4) Company Secret:

If, as a consequence of any legal or contractual relationship or professional collaboration with another entity or professional, they have knowledge of any information related to their business environment, used and maintained with confidentiality and exclusivity criteria in order to ensure an optimal position in the market, no may disseminate, reveal or assign, or use it for their own benefit.

It is also strictly prohibited to seize any data, written or electronic document, computer media, make recordings or intercept any means of communication of an entity or professional, with the purpose of discovering a business secret.

### 6.7) Relationship with the staff that makes up the Foundation

#### 6.7.1) Selection criteria:

Social Promotion will maintain the most rigorous and objective selection program, attending exclusively to the academic, personal and professional merits of the candidates and the needs of the entity.

#### 6.7.2) Moral Integrity:

Social Promotion rejects any manifestation of violence, physical, sexual, psychological, moral or other harassment, abuse of authority in the workplace and any other conduct that

generates a humiliating, intimidating or offensive environment for the personal rights of its collaborators

6.7.3) Freedom of Thought:

Social Promotion does not impose criteria in the opinion and respects the freedom of thought.

6.7.4) Conciliation:

Social Promotion respects the personal and family life of its employees and will promote conciliation programs that facilitate the best balance between that and their work responsibilities.

6.7.5) Training:

Social Promotion promotes the training of its employees.

6.7.6) Right to privacy:

Social Promotion respects the right to privacy of its employees, in all its manifestations, and especially in regard to personal, medical and economic data.

6.7.7) Safety and health at work:

Social Promotion promotes a safety and health at work program and adopts, at least, the preventive measures established in this regard in current legislation.

The members or collaborators of Social Promotion will observe the norms relative to safety and health in the work, with the aim of preventing and minimizing the labor risks.

6.7.8) Gifts and favors:

The members or collaborators of Social Promotion cannot give or accept gifts in the development of their activity within the Foundation.

Exceptionally, the presentation and acceptance of gifts in the exercise of their professional activity will be allowed as long as each and every one of the following four circumstances concurs simultaneously:

- They are of symbolic economic value (but never cash).
- They respond to usual rules of courtesy or usual commercial attention.
- They are not prohibited by law or generally accepted business practices and.
- They were communicated to your hierarchical superior.

6.7.9) Business opportunities:

No member or collaborator of Social Promotion may use the name of Social Promotion or invoke their professional category to carry out operations for their own account or for related persons.

No member or collaborator of Social Promotion may carry out, for their own benefit or that of related persons, investments or any operations linked to the assets of the Foundation that they have knowledge of during their professional performance, when the investment or operation would have been offered to Social Promotion or Social Promotion would have an interest in it, provided that the Foundation has not rejected said investment or operation without being influenced by the corresponding collaborator.

#### 6.7.10) Corporate image and reputation:

Social Promotion considers its image and corporate reputation as one of its most valuable assets in order to preserve the trust of donors, customers, collaborators, suppliers, authorities and society in general. Consequently, the members and collaborators are obliged to:

- Take the utmost care to preserve the image and reputation of Social Promotion in all its activities.
- Observe at all times an irreproachable conduct when Social Promotion authorizes the use of the brand, logo or any other tangible or intangible assets of the Foundation, including both professional and extraprofessional conduct, and preventing both from compromising or damaging the image or the reputation of Social Promotion.
- Be especially careful in public interventions.

#### 6.7.11) Confidentiality. Data Protection:

All information owned or guarded by Social Promotion of a non-public nature is considered reserved and confidential. In relation to this information, employees are subject to the following obligations:

- They must keep strict confidentiality about the information they access as a result of the performance of their professional activity.
- They must use said data or information exclusively in the performance of their professional activity and may not provide it more than those other professionals who need to know it for the same purpose and will refrain from using it for their own benefit.
- They must not fraudulently use said information and avoid personally benefiting from a profit opportunity of which they were aware during the performance of their duties.
- In particular, they must maintain professional secrecy in relation to data, reports, accounts, balance sheets, strategic plans, organization charts, and ways to organize the Foundation.

- They will not reveal, in any case, personal data obtained from customers, donors, suppliers, public administrations and the public in general.
- Likewise, the information about which, for any reason or circumstance, one may have knowledge about employees, members of the board, and executives, including, where appropriate, the information related to any personal or familiar data , remuneration or that relating to health information or medical nature to be of a personal nature, is sensitive information and therefore especially protected by the legislation on Protection of Personal Data.
- The obligation of confidentiality of the professionals of Social Promotion will subsist even after finalizing its relations with this Foundation.

#### 6.7.12) Disclosure of recordings and images of clients, volunteers and employees:

- The obtaining, reproduction, publication or disclosure by photography, video or any other procedure, medium, or current or future support, of the image, name and / or voice so that they can be used in the present or in the future, for advertising purposes, scientific, educational, informative or informative, will always require the express permission of the person.
- In the use of these images, Social Promotion must comply at all times with the requirement of Organic Law 1/1982, of May 5, Civil Protection of the Right to Honor, Personal and Family Intimacy and the Own Image, and with Regulation (EU) 2016/679, of April 27, 2016, general data protection or legislation that replaces them.
- In no case will the dignity of the person being violated, and should always be respectful images.
- The disclosure made by Social Promotion will be non-profit.
- In no case will the persons included in the photographs, videos or media be remunerated.
- The authorization must be kept in the corresponding file.
- Regarding the workers and employers of Social Promotion, their express authorization for the dissemination of images or recordings will also be required. Said authorization may be revoked at any time by any of them.

#### 6.7.13) Responsible use of Social Promotion resources:

- Social Promotion makes available to its members or collaborators the necessary resources for the performance of their professional activity and undertakes to provide the necessary means to protect and safeguard them.

The members or collaborators will use the resources placed at their disposal by the Foundation in accordance with the rules that follow.

- The computer systems and, in general, any other means that Social Promotion makes available to its members or collaborators for the performance of their tasks, are not provided for non-professional personal use and are not suitable for private communication. Consequently, they do not generate the expectation of privacy in case they have to be supervised by Social Promotion in the proportionate performance of their control duties.

Therefore, for the protection of the founding patrimony and to ensure the security and confidentiality of the information of the donors, clients, and the models and standards generated, Social Promotion has reserved the permanent faculty to review and verify the devices placed at its disposal as well as the content of the hard disks of the computers and the accesses and extraction of documents outside of their systems, files or programs.

Such revisions will always be carried out by the internal technical services, or external ones that are expressly designated for that purpose.

- Unless the Foundation expressly authorizes it, the members and collaborators of Social Promotion:
  - a) They will not use said resources for personal or extraprofessional uses and/or for the performance of activities that are not directly related to the interest of the Foundation, except for exceptions. In those cases in which exceptionally these resources are used for personal purposes, the use must be reasonable, adequate and in accordance with the principle of good faith contractual, being prohibited access to inappropriate or immoral content of the Internet.
  - b) They will not deliberately subtract or consent to a third party subtracting said resources, as well as the assets, effects and other assets of any kind.
  - c) The domain [promocionsocial.org](http://promocionsocial.org) corresponds exclusively to professional use and is the only channel to communicate with customers, suppliers or any other professional or third party for issues that affect the scope of action of Social Promotion.
  - d) Social Promotion professionals will strictly comply with the rules established for the Foundation at all times in terms of computer security and in particular, will provide special protection to computer systems, adopting all security measures to protect them and that includes, As the most elementary, do not provide the computer password or access code or any similar data that allows access to all or part of the system.

## 6.8) Relationship with public agencies

- 6.8.1) Corruption, bribery, influence peddling, in any of its forms, are unacceptable behaviors that Social Promotion does not tolerate under any circumstances.
- 6.8.2) No Social Promotion professional is authorized to offer, promise or grant any undue advantage or benefit, pecuniary or of any other kind, corrupt or attempt to corrupt, by himself or by an intermediary, an authority, public official, employee or director of a company or public, national or foreign agency, for their own benefit or that of a third party,

for the purpose of acting or abstaining from acting in relation to the exercise of their public functions to obtain or keep a contract, business, or any other competitive advantage in the realization of economic activities, whether at the local, regional, national or even international level. In the same way, such behaviors are forbidden during the processing of disciplinary proceedings or in any procedure to obtain subsidies or any advantage or benefits of a fiscal or administrative nature.

Likewise, no employee of Social Promotion must attend any request regarding the behaviors described in the previous paragraph, which come from an authority or public official.

6.8.3) Consequently, the realization of a gift by Social Promotion in favor of an authority, public official, employee or manager of a company or public, national or foreign organization will only be allowed when concurrently each and every one of the following three circumstances:

- They are of symbolic economic value or promotional nature, and they will never consist of cash money.
- They respond to usual standards of courtesy or usual commercial attention; AND,
- They are not prohibited by law or generally accepted business practices.

6.8.4) Likewise, an obligation is established to make known, in order for the Foundation to know about it, relationships of kinship, friendship or any other past or present relationship, which may exist between Employers, employees or executives of the Promotion Social with authorities, public officials, executives of public entities or organizations, so that influence peddling does not take place, understood as the exercise of an efficient pressure derived from personal relationships with an authority or official in such a way that the The motivation of its decision is based on personal elements, alien to public interests, in order to achieve a benefit of an economic nature.

6.8.5) In the event that a Social Promotion professional faces a situation in which he or she may be induced or forced to perform a corrupt practice such as those previously defined, or have a personal link with an authority or official, he or she should contact immediately and seek the advice of the Compliance Committee.

6.8.6) Any meeting held with public officials or authorities will be attended by TWO employees, managers or employers by Social Promotion, except in the case of mere formalities.

6.9) Relationship with political parties or unions

6.9.1) Social Promotion is alien to all expressions of ideas and opinions of political parties or groups and unions.

6.9.2) Social Promotion will abstain from carrying out any activity related to the financing of political parties and unions or sponsorship of events whose sole purpose is political activity.

6.10) Relationship with the Community and the environment

Social Promotion assumes behavioral guidelines to minimize waste and pollution, conserve natural resources, promote energy savings, and respect environmental legislation.

#### 6.11) Relationship with the Public Treasury and Social Security. Compliance with the rules on the prevention of money laundering and financing of terrorism

##### 6.11.1) Fiscal and tax obligations

Social Promotion acts in accordance with Spanish regulations in compliance with its fiscal and tax obligations. For these purposes, and independently of internal control, the entity is subject to an external audit to verify its accuracy and, in its capacity as a Foundation, submits its annual accounts and the annual action plan to the Protectorate.

##### 6.11.2) Obligations with Social Security

Social Promotion is up to date with its obligations to Social Security in relation to all of its employees.

##### 6.11.3) Compliance with regulations on the prevention of Money Laundering and financing of terrorism

The Foundation complies with the regulations on the prevention of money laundering and the financing of terrorism in its policy of accepting donations and the current legislation on the protection of the founding patrimony.

#### 6.12) Financial Investments Policy

The Foundation makes all the temporary financial investments that are reflected in its Annual Accounts in accordance with the principles and recommendations indicated in the approved Codes of Conduct in development of the fifth additional provision of Royal Legislative Decree 4/2015, of October 23, by which approves the revised text of the Securities Market Law.

Specifically:

- Decisions on the investments made are taken in accordance with the indications made by the Executive Committee of the Board of Trustees, which is made up of people with sufficient technical knowledge.
- All of them are carried out according to their security, liquidity, and profitability and at all times monitoring the balance between these three principles.
- The Foundation diversifies the risks of these investments, making them in secondary official markets and avoiding the performance of operations that respond to a purely speculative use of their financial resources.

#### 6.13) Relationship with Members of Board of Trustees

##### 6.13.1) Incompatibilities

The following people cannot be proposed for the position of member of Board of Trustees:

- The bankrupt during the period of disqualification.
- Those sentenced to penalties that include the disqualification for the exercise of public office.
- The personnel at the service of the Public Administrations with functions that are directly related to the Foundation's own activities.
- Persons with due and due debts of any kind in front of the Foundation.

#### 6.13.2) Honorability and capacity

The person proposed for the position of member of Board of Trustees must observe a dignified personal behavior and possess the adequate capacity to exercise the functions of the Board

#### 6.13.3) General Obligations

- Direct and control the management of the Foundation with complete fidelity to the interest of the Foundation.
- Actively participate in the meetings of the Board of Trustees, collect the necessary information, request the collaboration or assistance it deems appropriate and urge the call for meetings of the Board of Trustees, or the inclusion in its agenda, of those points it deems appropriate.
- Keep secret of the information you know as a result of the exercise of their functions.
- Refrain from attending and intervening in the deliberations in which it may be affected by a conflict of interest and shall advise the Board of the existence thereof.
- Carry out for its own benefit, or of the persons related to it, any investment or operation of which it has knowledge during the exercise of its position.

## 7) THE NORMATIVE COMPLIANCE COMMITTEE

The Compliance Committee for Social Promotion is the collegiate body responsible for the highest vigilance and control functions of this Code of Conduct and regulatory compliance.

### 7.1) Composition

It will be composed by the Secretary of the Board, the General Director and the Director of the Legal Department of the Foundation.

The Normative Compliance Committee of Social Promotion may go to an external professional if it deems it necessary for the clarification of the facts that it will be obliged to keep the maximum reservation on the question posed.

### 7.2) Funtions



The Compliance Committee will have, among others, the following functions:

- Disseminate the knowledge and understanding of the Code of Conduct.
- Check the application of the Code of Conduct through specific activities aimed at controlling the continuous improvement of behavior in the field of Social Promotion.
- Receive and investigate notices of infractions of the Code of Conduct and any other internal regulation, such as the Manual for the prevention of criminal offenses and the different protocols that Social Promotion has at each moment.
- Propose the imposition of sanctions and the adoption of disciplinary measures.
- Propose to the Board the modifications or contributions to integrating the Code of Conduct.

### 7.3) Training

The Code of Conduct will be announced through its delivery to the people involved, who will sign a receipt.

Additionally, and in order to ensure a correct understanding of the Code of Conduct at all levels, an annual training plan will be established to explain the knowledge of the principles and norms established in this Code of Conduct, as well as the specific action protocols for each specific field of activity, which will be taught according to the specific functions performed by the staff.

### 7.4) Complaints and suggestions channel

Social Promotion has established a channel of complaints and suggestions and will ensure confidentiality in the treatment of information.

The electronic address is as follows: [compliance@promocionsocial.org](mailto:compliance@promocionsocial.org).

In-person or telephone interviews with all or any of the members of the Compliance Committee may also be maintained.

### 7.5) Violation of the Code of Conduct

The Social Promotion Compliance Committee will send reports on the violations of the Code of Conduct detected following complaints made or indications of those involved or after the audit activities, as well as any suggestions deemed necessary:

- In the most serious cases, to the Board.
- In other cases, to the Executive Committee of the Foundation.

### 7.6) Review

The present Code will be revised and modified as many times as the circumstances require and in every case, every three years.

This Code of Conduct has been approved by the Board of Social Promotion on December 20, 2018 and will take effect in the week following its approval.

The signatory states that he has read and understood the Code of Conduct and declares to be informed of its obligations.

Madrid, 14 December 2018