

# CETT GROUP

## Code of Ethics and Best Practice



## FOREWORD

**CETT Group** is an international centre for research and knowledge transfer in hospitality, tourism and gastronomy, adjoined to Universitat de Barcelona.

Our core values represent us as organization, define our attitude, behaviour and personality.

Our core values are:

1. Taking the initiative
2. Vocation of service
3. Commitment with education
4. Team work
5. Capacity to learn and grow
6. Integrity
7. Entrepreneurial spirit and perseverance
8. Talent, Effort, Ambition & Modesty (TEAM)
9. Open-mindedness
10. Social Corporate and Individual Responsibility
11. Work for the good of the community

**CETT Group** is formed by education and training companies and services specialized in hospitality and quality touristic products. Sustainability is a basic pillar of our foundations and a key part of our strategic planning and it has become the basis to define ourselves and carry out our activity in social, environmental and economic areas.

In that respect, we care for environmental, social and cultural sustainability, incorporating sustainable economy criteria with a view to improving global management and offer opportunities for development; we also transmit our skills in responsible management in many areas, to our students (economic, environmental, social, etc.). We believe in helping people grow and in organic growth as a basis for both our responsible development and strategic growth plan.

Besides, our social side is one of our pillars. Therefore, from our first steps, we implemented and carried out several initiatives in collaboration with other stakeholders. The Gaspar Espuña-CETT Foundation deserves special mention in this area.

**“We are fully aware of our social and educational commitment; the Foundation Patrons have the responsibility to maintain, consolidate and expand our founding principles and actions, in line with the sign of times so as to contribute to the development of people, our community and the country”**

**Gaspar España Berga**

**Honorary Founding Chair of Fundación Gaspar España-CETT**

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## 1. CETT Group Code of Ethics and Best Practice

CETT Group is complying with this Code of Ethics (Code) and Best Practices because of our willingness to comply with the existing legislation, follow the recommendations from the authorities and adhere to corporate social responsibility practices.

Our Code has been drawn up to set general guidelines, values and ethical principles that must be followed by trustees, members of the governing body, legal representatives and stakeholders, whatever their relationship with CETT Group, to guide their activities.

Likewise, company subsidiaries and other organizations with links to the Group will also be upheld to the principles of the Code. Our goal is to create our own ethical corporate culture. CETT Group is committed to enforcing the Code and to ensuring that its principles are followed in all commercial and professional relationships with other agents in the marketplace such as suppliers, collaborators, contractors, subsidiaries or customers over whom we have no power. The Code will also apply when we participate in Joint Ventures, temporary associations with other companies or any other type of associations.

By drawing this Code, CETT Group aims at preventing socially unacceptable behaviour or behaviour contrary to law. Hence, our Organization is committed to carrying out the following actions:

- Identify risk prone behaviour and practices which may infringe the Code's principles.
- Thoroughly define what behaviour is expected by the Group from any person who has a relationship with us. Establish adequate measures that will help prevent inappropriate or unlawful behaviour (Crime Prevention Models).
- Supervise and enforce the Code; assign responsibilities if there is an infringement of the Code principles.
- Define disciplinary action

CETT Group is fully committed to adapting the Code to the impending social environment or to changes in law so as to preserve the Code's relevance and applicability.

## 2. Ethical principles which govern CETT Group. The Foundation

CETT Group's core is providing training and services in the hospitality, tourism and gastronomy sector.

Our Group is fully committed to upholding the following principles and to using them to inform its ethical commitment towards our community, to inspire and guide our staff daily business through:

- Good corporate governance.
- Transparency when disclosing internal and external information, making sure such information is accurate and certain, especially financial information which may affect trustees, shareholders, partners and the marketplace.
- Loyal Competition from the Group towards other operating agents in the marketplace by encouraging free competition and respect towards consumers and users.

- Respect towards the environment; sustainable economic growth
- Constant commitment to innovation
- Pro-active and efficient social compromise and responsibility
- Loyalty towards the Code: professional ethics, good faith in commercial, transactional relationships and from stakeholders.
- Integrity and honesty in our commitment and actions.
- Effective protection of Human Rights and of the liberties of third parties.
- Utmost respect for the existing legislation of the territory where the Organization may be operating as well as to CETT's own norms.

We will also enforce the compliance with the Code, when external services may be subcontracted.

**Gaspar Espuña-CETT Foundation is responsible for enforcing the principles and values of the Group which also upholds.**

The Foundation was created in 2000 by [CETT Group](#) founder, Gaspar Espuña, to disseminate and promote his ethics. It is a private foundation, inseparable from CETT Group; it is an open and creative foundation and it is also the engine of the [Group's](#) activity. Its strong commitment to social responsibility and its commitment to disseminating it across the [Group's](#) companies is the Foundation's distinguishing feature.

The Foundation not only disseminates its values and principles, but it exemplifies and defends them every day.

The Foundation raises its funds following principles of honesty, respect, integrity and transparency, always considering the interest of its beneficiaries and not personal or professional interests. Fundraising is done, lawfully, unequivocally and following the Foundation's mission.

Our search for resources is based on maximizing results with the lowest cost, highest efficiency and utmost respect for the environment. Both public and private donations which pose a conflict of interest with our values and goals are rejected. Information regarding funds raised is made public, and it is accurate and certain; accountability to our donors is always guaranteed.

The Foundation counts with criteria and rubrics to inform what activities are in line with the Foundation's goals, that is, support academic research in the field of hospitality, tourism and gastronomy. These activities will always be assessed considering the balance between economic and business feasibility, impacts and profit, degree of innovation, consistency and compliance with ethical values described on the Code.

The Foundation always examines thoroughly the companies it works with. They all must comply with the existing legislation in the country where they may operate, respect human rights, international law and environmental values beyond a mere compliance with the legislation; they must also have a similar corporate culture and set of values to [CETT Group](#).

Safety, liquidity, profitability, diversification, non-speculation and ethical values guide the investments made by CETT Group and the Foundation in particular.

### **3. CETT Group's social commitment towards its stakeholders**

The following paragraphs describe the commitment made by **CETT Group** towards its stakeholders (staff, shareholders, partners, trustees, customers, residents, guests, students, suppliers, the local community).

**CETT Group** will actively enforce compliance with this Code and its principles among its stakeholders.

#### **Our Team**

**The Group** is committed to thoroughly examining recruitment processes for both academic and non-academic personnel, so they also follow the Code and its principles.

Members of staff will be treated with respect, their rights will always be guaranteed, (especially their right to privacy); staff will be treated equally within our Organization and their diversity, protected. Under no circumstance discrimination on the basis of age, gender, race, sexual orientation or religion will be tolerated. Sexual harassment, abuse of authority or threatening behaviour will also be prohibited. Employment and promotion are based solely upon individual merit and qualifications directly related to professional competence so personal or subjective criteria will never apply. **CETT Group** is committed to actively promoting professional development among our staff as well as to helping them balance work and personal life. We are also committed to guaranteeing a safe work environment and to the good health of our staff and therefore we strictly comply with the existing Health and Safety at Work legislation by applying the required measures. The **Group** guarantees training in Health and Safety procedures in the workplace and the necessary equipment for staff to carry out their professional duties safely, and hence, staff must follow the established rules to protect their health in the workplace.

**CETT Group** guarantees a safe work environment, promotes teamwork and a solid corporate identity.

We prioritize lifelong learning and professional development among staff, by offering training opportunities (in-office) and financial support for training, considering the needs of each business unit.

We recognize and respect the right to freedom of association of our members of staff; we recognize our staff's right to join trade unions of their own choosing and follow their organisational activities, and their right to collective bargaining.

**CETT Group** will actively promote among staff the content of this Code and will ensure its acceptance and compliance.

#### **Students, residents, guests and customers**

**CETT group** guarantees top quality, satisfaction, and excellence in all the services we provide, all the products we sell to customers, students and guests and the best customer service to meet the highest quality standards. Respect, professional responsibility and honesty guide all our commercial relationships and we always comply with the existing legislation that regards

consumers and users' rights; all our products are of the highest quality and fully comply with the existing legislation too.

We are committed to disclosing all information required by our customers, students, residents and guests; such information will be transparent, clear and unequivocal and it will comply with the existing norms so as to provide accurate and certain information and to allow fair play.

Therefore, all our promotional activities will be: *a) clear, b) direct, c) legal, d) complete* so our customers, students, residents and guests always have the best information to inform their decisions. Under no circumstance **Group CETT** will use misleading or deceptive promotional tools.

Personal or familiar relationships will not interfere in our relationship with customers since all our interactions will be guided by impartiality. Independence and impartiality must also guide the concession or the agreed conditions of financial or contractual transactions, and these will be carried out avoiding risks for the Group.

As an educational organization, **CETT Group** is responsible for working along with students from different perspectives, transmitting our corporate values of social responsibility which will also be applied on their academic duties, personal relationships and professional careers. Students' satisfaction is our priority and we strive to establish a sound relationship between students and our company as well as to achieve academic excellence; the latter is one of our core values besides our commitment to innovation, specialization and internationalization.

We are fully aware that our students are a vulnerable community because of their ongoing personal, professional and academic development, and because of that, we care for them. Therefore, we will not tolerate any violation of the values and principles that guide our educational centres and we ask our teaching and non-teaching staff to stop or report any situation of harassment or bullying on any grounds, especially if they involve under age or vulnerable students; we also ask our staff to report the presence of drug use or dealing by any member of CETT's community.

### **Suppliers and contracted companies**

**CETT Group** will prioritize relationships with suppliers and companies that are managed following sustainability and quality criteria.

We will appoint suppliers considering impartial and objective commercial and economic criteria without the interference of personal interests that may cause a conflict of interest. Group CETT will thoroughly supervise supplier's appointment procedures to guarantee impartiality.

We will encourage suppliers and service providers to comply with and respect our Code. From our side, we will commit ourselves to dealing with suppliers equally and fairly; we will guarantee confidentiality of their data and of data that may affect the suppliers' ability for competition.

Appointment and selection of suppliers will follow our internal regulations and the existing legislation; it will be done with transparency, equality and impartiality. We will avoid dealing with suppliers whose commercial or personal interests or whose activities infringe or may infringe our interests and values.



**Donors and beneficiaries of the Foundation, agents, representatives, commission agents, contractors and partners**

We support the free market and fair play; we deeply respect competition and anti-corruption legislation and disregard unfair competition. Our commercial relationships are based on innovation, sustainability, cost-efficiency, and quality of service. We are committed to thoroughly supervising the selection processes of our collaborators. We will also enforce adherence and compliance with our Code and its principles among our collaborators.

Stakeholders such as donors and beneficiaries will also uphold the Code. Our donors will be selected objectively and impartially. The Foundation is committed to supervising the selection of donors and beneficiaries and will make sure that such donors and beneficiaries follow our Code and comply with the existing legislation.

CETT Group and the Foundation are also committed to treating its business partners, donors and beneficiaries with transparency and equality and we guarantee their data confidentiality, especially data that may affect their performance in the market.

Upon enforcement of this Code, business partners, donors and beneficiaries will be considered as members of staff and therefore, will have to comply with it.

**Shareholders/partners, trustees, members of the governing body, legal representatives and top executives**

We are fully committed to guaranteeing that the information we disclose to shareholders, partners and trustees is accurate; we thrive to achieve common beneficial goals and to achieve a trusted environment based on communication, mutual trust, transparency and loyalty.

In that sense, CETT Group will actively promote the acknowledgement of the Code and the importance of its principles for our shareholders, partners and trustees.

We are fully committed to complying with existing and future laws regarding good corporate governance or any other recommendations from the authorities on this matter.

Top executives, legal representatives, members of the Administration Board and trustees must display an exemplary conduct for all members in all areas of business and for external agents.

Each executive is responsible for ensuring that each and every one of our members of staff and those they oversee, that they know CETT Group's values and ethos; our executives must provide adequate training according to staff's position and the necessary information that can help stop unacceptable behaviour from happening.

Our shareholders, partners, trustees, members of the Board of Directors, legal representatives and executives all know and comply with the existing good governance principles of the Group.

**The sector: competitors, public administration, associations, foundations, NGOs, professionals of the sector and the media.**

We compete fairly, within legal boundaries and respecting the principles of a free competitive marketplace and we avoid any behaviour that may appear to restrict another company's ability to compete.

We base our business decisions, ordinary or strategic, on independence, self-development, self-financing and sustainability and we always carry out our business decisions respecting and exemplifying our Code principles.

We shall not, by commission or omission provide false or illegal publicity that may harm our competitors, consumers and/or users.

We will also adhere to comply with the existing applicable local legislation (domestic or international) regarding competition and will fully collaborate with market regulating authorities.

We guarantee the protection of intellectual and industrial property of third parties; we shall not use information from any third parties without seeking authorization, nor illegally sourced information.

### **Public bodies, government officials and authorities**

**CETT Group** carries out its activities with the utmost respect for the existing and future legislation in the locations where it is or may be carrying its activities out and will always guarantee political impartiality and our organization's reputation.

We shall not have a part in any project which may compromise the respect for legality, honesty and integrity as described on this Code. Likewise, the relationship between **CETT Group** and public bodies will be based on principles of cooperation and transparency.

All relationships between **CETT Group** and any public body will be guided by principles of integrity and lawfulness, always complying with the existing legislation in any locations where we may operate.

### **Environmental practices**

We guarantee the utmost respect for the environment and we contribute to sustainable growth by reducing or getting rid of negative environmental impacts caused by our activities. It is for this reason that we are committed to reducing the effect of climate change. We fully comply with the existing environmental legislation and we aim at developing R+D measures to help promote the protection of the environment; we will train our staff in this matter too.

We are fully committed to reducing our environmental impact and the pollution derived from our activities, products and services and we will do so by looking for the most cost-efficient use of resources, e.g. implementing measures to save electricity and water, focusing on waste reduction, using the best and most economic viable technology available, to make our services and activities more environmentally respectful.

**CETT Group** has a comprehensive quality, environmental and socially responsible policy which we are committed to disseminating among our stakeholders.

We also hold an integrated quality and environmental management system based on the ISO 9001:2008 (training), ISO 14001:2004 & EMAS (Hotel Alimara) and we also voluntarily adhere to other compromises.

We shall respect the existing administrative and urban planning legislation in any location where we may be.

CETT's staff, as defined later, will also respect and uphold the commitment we have described here.

#### **4. Duties for trustees, members of the governing body, legal representatives, executives and CETT staff.**

Trustees, members of the governing body of all [CETT Group](#) companies, legal representatives, executives and staff (also referred to as personnel) whichever the contractual relationship they may have with [CETT Group](#), will uphold the principles and norms in the Code of Ethics and Best Practice and will comply with all the commitments made by [CETT Group](#) and also with the following guidelines:

##### **1) Abide by the Code of Ethics and Best Practice**

CETT's personnel will abide by the Code on their everyday tasks.

Likewise, staff are responsible for knowing, following and applying the norms, policies and procedures that may apply according to their role, responsibility and position; staff are also committed to respecting traditions and common practices of the countries where they may operate.

##### **2) Conflict of interest**

CETT staff are fully committed to avoiding any situation that may cause a conflict of interest between their personal interests and those of [CETT Group](#); members of staff will not make decisions that may cause such conflict of interest and will immediately report the situation to their supervisors or appropriate body.

The nature of personal interests that may create conflict directly or indirectly with those of [CETT Group](#) is varied. The nature of these interests with suppliers, collaborators, competitors, customers and the authorities may be commercial, personal or property related.

All members of staff must report the existence of a conflict of interest or if there is reasonable doubt of its existence. Our company may authorize certain transactions that may appear to create a conflict of interest if they are fully justified. Such situations will always be reported to line managers, supervisors or the applicable governing body. Business decisions will therefore, be made considering transparency, impartiality, cost-efficiency and quality of service and the benefit for the Organization.

Under no circumstance no member of staff shall use information obtained because of her/his position within [CETT Group](#) for their personal benefit or for someone they are close to.

##### **3) Use of information**

CETT staff will guarantee confidentiality and protection of private information of [CETT Group's](#) stakeholders, whichever the professional relationship they may have or may have had with CETT.

All employers shall fully comply with the Data Protection Law and will not divulge nor make changes to data without the owner's consent. Likewise, employers will help preserve the integrity and the availability of the Group's documents.

Staff who may have access to non-public information shall not use it unlawfully nor for personal benefit and will always keep it private. Employers who may have access to financial information shall not use it to influence on trading in stocks and will also refrain from stock trading or providing information to others so that they may trade.

If you suspect or have proof of someone using non-public information or leaking non-public information, it will be immediately reported to the Compliance Body.

#### **4) Anti-corruption policies. Bribery and influence peddling**

Members of staff must stay clear from unethical behaviour for their own benefit or the benefit of others in the Group that may interfere in decision making, with the authorities or public or private legal entities.

Employers shall not make promises, give gifts, make donations, give money, or offer advantages with the intention of bribing public agents, companies or individuals for personal benefit or the Group's. Likewise, staff will not accept gifts or improper payments that may influence on their professional relationships with other public or private agents in the marketplace. This will not apply when and if local customs make situations like these acceptable.

The same applies to relatives and friends of government officials or of public or private figures of authority who may be requested to give favours in return.

Should staff have questions as to whether to accept a gift, invitation or receiving anything of value or any advantage, they will ask their supervisors or the Compliance Body.

**CETT Group** is committed to cooperating with institutions that have the enough means and the ethics to properly deal with any received donations and account for them following the General Accountancy Plan. **CETT Group** will effectively monitor and supervise such donations.

If you suspect or have proof of an irregular situation of this nature, you will report it to your supervisors or the Compliance Body.

**CETT Group** does not make direct or indirect donations to political organizations (nor to relatives or close associates of political organizations) nor to politicians. All donations must comply with the existing legislation and not harm the Group's image and therefore, both applicants and recipients of donations must be easily tracked down.

**CETT Group** will refrain from engaging in actions aimed at financing political parties or funding events with a political objective. Likewise, the Group will refrain from exercising direct or indirect pressure of a political nature.

All members of staff must report the existence of such situations and these should be immediately reported to supervisors or the Compliance Body.

#### **5) Money laundering. Financing of terrorism**

Employers will actively avoid any behaviour that may be classified as money laundering or financing of terrorism. We consider the following to be examples of money laundering:

- Payment recipients that cannot be tracked or with a non-traceable origin
- Unusual cash payments.
- Payments to legal entities or individuals who live in tax havens or have bank accounts there.
- Payments by cheque payable to bearer or order cheques
- Payments done using a different currency to the currency expressed in the contract or bill.
- Payments done to or by third parties who are not present in the contract.

As stated before should you have any questions you must speak to your supervisors or the Compliance Body. Should you learn about an inappropriate situation of this nature, you should also report it. [CETT Group](#), will implement systems of organization and management to prevent penal risks, or avoid and reduce, within our reach, unlawful or unacceptable behaviour.

## **6) Social Security and Tax and Revenue**

[CETT Group](#) staff and staff from the Group's company state that behaviour which leads to tax avoidance or to Social Security fraud will not be tolerated.

Likewise, staff are committed to cooperating with supervising government officials or bodies and processing their requests to help them with their auditory or supervisory duties.

## **7) Methods of payment and financial operations**

Our personnel will ensure that the Group's important economic transactions are thoroughly recorded and kept in the ledgers and will ensure these financial operations are faithfully recorded. To achieve this, all current accountancy principles, regulations and recommendations will be followed.

Any unlawful payment done by any member of [CETT Group](#) staff with access to financial assets will be severely sanctioned. Any financial operation which uses [CETT Group](#)'s funds must meet the following criteria:

- a) It is related with the goals of any legal entity that is part of [CETT Group](#) or follow the Group's principles of Corporate Social Responsibility.
- b) Any quantity spent is reasonable according to current financial and marketplace criteria.
- c) Any operation must be authorized by the relevant member of staff.
- d) Any payment must be done by bank transfer or order cheque except for authorized petty cash operations.
- e) Any operation must be faithfully and dutifully recorded and accounted for.

f) The recipients of the payments must be clearly identifiable and legal.

CETT Group's staff will not engage in the following activities when they carry out their professional duties:

- a) No parallel bookkeeping will be kept.
- b) False or inaccurate records will not be kept.
- c) Manipulate bookkeeping records or use false documents.
- d) Purposefully destroy documents before the date fixed by law.

#### **8) Use of company resources**

CETT Group resources are available for staff to use so they can dutifully carry out their professional activity. However, the Group's resources must be used following the rules for use we will describe below (unless differently determined by internal rules):

- Our personnel must look after the available resources and use them for purposes in the interest of the Group and for its benefit.
- CETT Group resources will not be used for private or extraprofessional purposes except in reasonable occasions and following contractual good will.

Electronic devices such as telephones and computers, will always be used with professional purposes, unless otherwise stated in a contract. The use of external files or software can cause harm to Group CETT's security or may infringe copyright laws if they are not properly used or authorized. Hence, the use of unauthorized software, dangerous downloads or inappropriate behaviour that may endanger our cybersecurity or infringe intellectual property and copyright laws is strictly prohibited.

It is also strictly forbidden to send offensive or threatening emails, use inappropriate language, make inappropriate comments that may compromise or tarnish CETT Group's image and surf websites with inappropriate content.

CETT Group's image, brands and reputation will be protected by staff members as they carry out their professional activity and they will not engage in activities that may tarnish or destroy the Group's image.

The Group's patent rights and copyright licenses will be used by our staff internally and for the benefit of the Organization. The know-how created by CETT staff will belong to the Group. Third party copyrights will never be infringed, and the relevant authorizations and licenses will always be sought.

Staff will watch over our resources to avoid theft, whichever their value.

Both tangible and intangible resources will only be used for the benefit of the Organization and never for the benefit of third parties.

The acquisition of resources, goods and services will always be done transparently and objectively to avoid conflicts of interest.

We highly respect copyrights. We will comply with the existing legislation and staff will be trained so they do not infringe any copyright laws and learn how to obtain the necessary licences should the use of copyright protected information be necessary.

#### **9) The environment**

CETT staff treat the environment with the utmost respect and contribute to a sustainable development, by reducing or totally avoiding negative impacts and hence, helping reduce the effects of climate change. We are therefore, committed to complying with the existing environmental legislation and consequently, reduce pollution caused by our activities, products and services and to looking at ways to save energy and water by increasing the use of renewable sources of energy. We are also strongly committed to managing and reducing waste efficiently.

Our staff are completely committed to respecting the administrative and urban planning legislation existing in all locations where they may develop their professional duties.

#### **10) Goods trading**

Under no circumstances, our staff will acquire goods or rights whose rightful owner is the Organization or any legal entity that is part of [CETT Group](#); likewise, they will not carry out any business trading such goods.

However, [CETT Group](#) can authorize some operations or acquisitions if they are transparent, meet the standard market conditions and do not cause any conflict of interest.

#### **11) Staff training**

Our personnel are fully committed to participating in training programmes offered by the [Group](#) and are also committed to updating their knowledge in line with CETT's commitment to academic and human excellence.

The Group is committed to promoting and facilitating the personal and professional development of our team by offering in-house training and financial help for external training that can help address the training needs prioritized by each department.

#### **12) Human rights and public liberties**

Our staff are committed to protecting human rights and public liberties as recognized by the Universal Declaration of Human Rights and the most widespread international conventions and agreements on this matter. We are particularly committed with the rights that refer to the protection of children and minority groups.

Under no circumstance, our staff will collaborate nor cooperate with organizations that do not respect human rights nor public liberties.

We will devise and offer training programmes to support our staff in human rights related issues and we will help disseminate the knowledge of these rights. Our staff should be committed to taking part in these programmes.

#### **12) Equality and protection against discrimination**

Staff must treat each other with respect and avoid aggressive, discriminatory or offensive behaviour, sexual harassment and abuses of authority.

#### **13) Prevention of work harassment**

CETT Group will not tolerate any direct or indirect comment or behaviour that degrades, undermines or scorns another person because of her/his sexual orientation, beliefs, origin, race, physical appearance, skills, political affiliation or trade union affiliation.

Any behaviour or act that attacks sexual liberties will not be tolerated.

Should any member of staff know of any behaviour of this nature or were suffering it, it should be immediately reported to supervisors, line managers or the Compliance Body. CETT Group is committed to ensuring confidentiality and victim's protection as well as to doing everything in our power to stop the situation once for all, and if need be, reporting the situation to the authorities.

#### **14) Other**

Staff are committed to fully complying with existing and future in-house or external legislation that may arise regarding our activity with the sector which CETT Group may be working with. Should staff have questions or queries before important decision-making, line managers or the Compliance Body must be asked.

### **5. Monitoring and assessing compliance with the Code of Ethics and Best Practice. Ethics Channel (Canal Ètic)**

All members of staff will display an exemplary conduct, upholding the principles that inspire this Code of Ethics and Best Practice, as well as complying with internal regulations, hence, ensuring honesty and transparency lead their professional activity and their commercial relationships.

Failure to comply with this Code of Ethics and Best Practice will lead to the application of disciplinary measures. CETT Group will provide staff and stakeholders with the necessary means to report failures of compliance; likewise, staff, stakeholders or auditors will fully commit themselves to monitoring compliance with the Code (for instance, by reporting suspected failures of compliance).

CETT Group is providing staff and stakeholders with the following channels to report and prevent possible misconduct:



- Canal Ètic or report to the Compliance Body. The Canal is a highly effective means; staff and stakeholders will be able to communicate confidentially and safely, any misconduct that may occur within the Organization.
- Both staff and stakeholders will also be able to contact directly the Compliance Body through these channels:
  - Telephone: 93 428 07 77.
  - E-mail: [canaletic@cett.cat](mailto:canaletic@cett.cat)
  - Postal address: av. de Can Marcet, 36-38, 08035 Barcelona.

Additionally, besides making queries to the Compliance Body, staff and stakeholders can consult the Legal and Human Resources Department should they have any queries regarding the applicable legislation in cases of non-compliance of the Code.

The Compliance Body, whose main task is to ensure compliance with the Code, will regularly report to the Board of Directors and [CETT Group's](#) Foundation on the results obtained from the cases assessed and, on the improvements, to be made.

## **6. Disciplinary measures of the Code of Ethics and Best Practice**

Staff are fully committed to following the Code regardless of their position, place of work or contractual relationship with the Organization.

Under no circumstance, staff will ask other members of staff nor stakeholders to infringe the principles of the Code; cases of staff infringing the Code because they may have followed orders from managers, shall not be justified.

Failure to comply with the Code of Ethics and Best Practice from staff, will be considered a serious offence and a violation of the contractual good faith; in such cases, the key facts will be analysed and sanctioned following the applicable disciplinary measures established by our internal norms, collective bargaining or existing labour law regardless of possible consequences that the application of such sanctions may carry.

Barcelona, 20th June 2016

## QUESTIONS AND QUERIES

Do you need help to know whether the Code of Ethics and Best Practice needs applying? Do you have any questions or queries? If that is so, please get in touch with your manager or the Compliance Body. When problems happen, open collaboration and cooperation are key to solving them.

Should you have any questions or queries there is an e-mail address you can use:

[canaletic@cett.cat](mailto:canaletic@cett.cat)

In order to know if a specific behaviour complies with [CETT Group](#) Code of Ethics and Best Practice you can pose yourself the questions below. If you have questions regarding your own behaviour you can also ask yourself these questions and try to answer them:

- Is this operation/transaction legal?
- Does my decision comply with the spirit and terms of the Code of Ethics and Best Practice and with the other principles of the Group?
- Is this operation/transaction fair and free of personal conflict?
- Is this operation/transaction fully based and justified for public approval?
- Does this operation/decision protect [CETT Group's](#) image? Does it comply with [CETT Group](#) ethical standards?