



Barcelona School  
of Tourism, Hospitality  
and Gastronomy

# CODE OF ETHICS AND BEST PRACTICE

Campus CETT

Integral S.L.

Estudis d'Hoteleria  
i Turisme CETT S.A.

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## Foreword

CETT, School of Tourism, Hospitality and Gastronomy is an international center for research and knowledge transfer in hospitality, tourism, and gastronomy, attached to Universitat de Barcelona.

CETT's core values reflect what is truly important to us as an organization and define our attitude, ethos, and culture.


Our core values are:

1. Taking the initiative
2. Vocation of service
3. Commitment to education
4. Teamwork
5. Capacity to learn and self-growth
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 fundamental pillar** of our foundations and a crucial part of our strategic planning. It has become the basis for defining and carrying out our social, environmental, and economic activities.

In that respect, we care for environmental, **social, and cultural sustainability, incorporating sustainable economy** criteria to improve global management and offer development opportunities; 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 our responsible development and strategic growth plan.

Besides, our **social side** is one of our pillars. Therefore, we have implemented several initiatives from our first steps with other stakeholders. In this respect, **CETT Foundation** deserves a special mention.



“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 to contribute to the development of people, our community, and the country.”

**Gaspar España i Berga**

Founder of CETT

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# 1. CETT GROUP CODE OF ETHICS AND BEST PRACTICE

The CETT Group, to comply with current legislation, the recommendations of public authorities, social responsibility, and correct corporate professional behavior, subscribes to the present Code of Ethics and Good Practice (from now on, we will refer to it indistinctly as the Code or Code of Ethics).

This Code is approved to establish the general guidelines, values, and ethical principles that must govern the conduct of the employers, the members of the management bodies, the management team, the legal representation, the employees, and the interest groups, regardless of the contractual relationship that binds them to the CETT Group (from now on referred to as the CETT Group), of the workers and stakeholders, regardless of the contractual relationship that links them to the CETT Group (from now on, the Group or the Organisation), or of the geographical area where they carry out their activities, and serve as a guide and reference for their actions.

In the same way, the companies in which the CETT Group participates, and the other organizations connected to CETT by a relationship of domination will also be bound by the ethical principles established in this Code of Ethics and Good Practices. The aim is to create a corporate ethical culture in the Group. On the other hand, the CETT Group will ensure that the principles regulated in this Code, principally fairness, equality, and respect for fundamental rights, govern all its commercial or professional relations with other market agents such as suppliers, collaborating companies, contractors or investees and customers over whom it has no control.

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

- 
- Identify risk-prone behavior and practices which may infringe the Code's principles to prevent them from happening in the future.
- 
- Thoroughly define what behavior the Group expects from anyone with a relationship with us or who works for us. Then, establish adequate measures that will help prevent inappropriate or unlawful conduct (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 impeding social environment or to law changes to preserve the Code's full relevance and applicability.

## 2. ETHICAL PRINCIPLES WHICH GOVERN CETT GROUP

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

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's daily business through:

- 
- Good corporate governance.
- 
- When disclosing internal and external information, transparency ensures such information is accurate and specific, especially financial information that 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.
- 
- Creation of value and sustainable and environmentally respectful economic growth.
- 
- Constant commitment to innovation
- 
- Pro-active and efficient social compromise and responsibility
- 
- Loyalty towards the Code: professional ethics, good faith in commercial and transactional relationships, and with stakeholders.
- 
- Integrity and honesty in our commitment and actions.
- 
- Effective protection of Human Rights and the liberties of third parties.
- 
- Utmost respect for the existing legislation of the territory where the Organization may operate and CETT's norms.
- 

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



## **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 España, to disseminate and promote his ethics. It is a private foundation, inseparable from CETT Group; it is an open and creative foundation and the engine of the Group's activity. The Foundation's distinguishing feature is its strong commitment to social responsibility and its commitment to disseminating it across the Group's companies.

The Foundation disseminates its values and principles and exemplifies and defends them daily.

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. Therefore, 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 true; accountability to our donors is always guaranteed.

Any commercial relationship with donors for their own benefit is rejected, as well as any personal remuneration to suppliers or clients, financial or in kind, as compensation for the commercial relationship.

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

The Foundation always examines thoroughly the companies it works with. They must comply with the existing legislation in the country where they may operate and respect human rights, international law, and environmental values beyond 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.

# 3. CETT GROUP'S SOCIAL COMMITMENT TOWARD ITS STAKEHOLDERS

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

Staff members 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 based on age, gender, race, sexual orientation, or religion will be tolerated. Sexual harassment, abuse of authority, or threatening behavior 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 and helping them balance work and personal life. We are also committed to guaranteeing a safe work environment and our team's good health. Therefore, we strictly comply with the existing Health and Safety at Work

legislation by applying the necessary measures. The Group guarantees training in Health and Safety procedures in the workplace and the equipment needed for staff to carry out their professional duties safely; hence, staff must follow the established rules to protect their health in the workplace.

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

At CETT Group, 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 freedom of association of our staff members; we acknowledge our staff's right to join trade unions of their choosing and follow their organizational activities and their right to collective bargaining.

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





## Students, residents, guests, and customers

CETT group guarantees top quality, satisfaction, and excellence in all our services, 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 regarding consumers' and users' rights; all our products are of the highest quality and fully comply with the current legislation.

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

Therefore, all our promotional activities will be: a) clear, b) direct, c) legal, and 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 familial relationships will not interfere with our customer relationships since all our interactions will be guided by impartiality. Independence and impartiality must also guide the con-

cession or the agreed conditions of financial or contractual transactions, which will be carried out to avoid risks for the Group.

As an educational organization, CETT Group is responsible for working with students from different perspectives, transmitting our corporate values of social responsibility, which will also be applied to their academic duties, personal relationships, and professional careers. Since students' satisfaction is our priority, we strive to establish a good connection between students and the corporate world by fostering clear communication and academic excellence; the latter being 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 we care for them. Therefore, we will not tolerate any violation of the values and principles that guide our educational centers. Therefore, we ask our teaching and non-teaching staff to stop or report any harassment or bullying on any grounds, especially if they involve underage or vulnerable students; we also ask our team to inform 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 interfering with personal interests that may cause a conflict of interest. Furthermore, group CETT will thoroughly supervise supplier's appointment procedures to guarantee impartiality.

CETT Group will actively promote the observance and respect of the principles in this Code among the suppliers that provide services and sell us products.

From our side, we will commit ourselves to dealing with suppliers equally and reasonably; we will guarantee the confidentiality of their data and data that may affect the suppliers' ability to compete.

The selection and contracting of suppliers shall always comply with the external and internal regulations in force. We shall guarantee transparency, equal treatment, and the application of unbiased and balanced criteria. We will avoid dealing with suppliers with commercial or personal interests, external activities, or relationships contrary to or potentially conflicting directly or indirectly with the interests and values of the CETT Group.

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

CETT Groups supports the free market and fair play; we deeply respect the 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.

The Foundation is committed to thoroughly supervising the selection processes of donors and beneficiaries so that objectivity is always retained, always selecting donors and beneficiaries who act per the present Code and strictly comply with the applicable regulations at all times.

CETT Group is committed to treating its collaborators and business partners, and the Foundation, the donors and beneficiaries, in an equal and transparent manner, as well as guaranteeing the absolute confidentiality of all their data, especially those that may affect the supplier's ability to compete in the markets.

For the purposes of this Code, our collaborators and business partners, the Foundation, its donors, and beneficiaries shall be considered as personnel concerning all the dispositions and in all that is established in this Code that may apply to them.

## 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 strive 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 acknowledgment 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 should stri-

ve to be a model of behavior for the members of all areas of the organization and those outside the organization.

Each executive is responsible for ensuring that every one of our members of staff and those they oversee knows CETT Group's values and ethos; our executives must provide adequate training according to the staff's position and appropriate training relating to the behavior that may result in the violation of the regulations and their implications.

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

## The sector: competitors

Group CETT competes fairly, within legal boundaries, respects the principles of a free competitive marketplace, and avoids any behavior 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.

By commission or omission, we shall not provide false or illegal publicity that may harm our competitors, consumers, and users.

We will also comply with applicable local legislation (national or international) regarding competition and will fully collaborate with market regulating authorities.

We guarantee the protection of third parties' intellectual and industrial property; we shall not use information from any third parties without seeking authorization or illegally sourced information.



## Relationship with the government and government officials

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. It will always guarantee political impartiality and our organization's reputation.

We shall not have a part in any project that may compromise the respect for legality, honesty, and integrity described in this Code. Likewise, the re-

lationship 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 nationally or internationally.

## Relationship of people with the impact on the environment

We guarantee the utmost respect for the environment and contribute to sustainable growth by substantially reducing or eliminating negative environmental impacts caused by our activities. For this reason, we are committed to reducing the effect of climate change. We fully comply with the existing environmental legislation and aim to develop 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. We will do so by looking for the most cost-efficient use of resources, e.g., implementing measures to save electricity and water, reducing waste, and using the best and most economically viable technology to make our services and activities more environmentally respectful.

The Group has an integrated policy of quality, environment, and social responsibility that the Management of the CETT Group is committed to extending to everyone who collaborates with the Organization.

CETT Group also holds an integrated quality and environmental management system based on the ISO 9001:2008 (training), ISO 14001:2004 & EMAS (Hotel Alimara) and voluntarily adheres 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, GOVERNING BODY MEMBERS, 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 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 in their everyday tasks.

Likewise, our staff is responsible for knowing, following, and applying the norms, policies, and procedures that may apply according to their role, responsibility, and position; the staff is also committed to respecting traditions and standard 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 interests and those of CETT Group; staff members 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. It is essential to emphasize the patrimonial, entrepreneurial, or personal relationships with suppliers, co-workers, competitors, clients, or public authorities.

All staff members must report the existence of a conflict of interest or if there is reasonable doubt of its existence. Our company may authorize transactions that 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, quality of service, and the benefit for the Organization.

Under no circumstance shall no staff member use information obtained because of their position within CETT Group for their benefit or for someone they are close to.

## 3. Use of information

CETT personnel will guarantee the strictest confidentiality and custody of all non-public information CETT Group stakeholders, regardless of whether or not the employment relationship with the Organization has been terminated.

All employers shall fully comply with the Data Protection Law and will not divulge or change data without the owner's consent or the competent public authority upon official request and with the appropriate legal guarantees. Likewise, employers will help preserve the integrity and availability of the Group's documents.

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

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



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

Staff members must stay clear from unethical behavior for their benefit or the benefit of others in the Group that may interfere in decision-making with the authorities or public or private legal entities.

Employees shall not make promises, give gifts, make donations, give money, or offer advantages to bribe public agents, companies, or individuals for personal benefit or the Group. Likewise, staff will not accept gifts or improper payments that may influence 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 public or private figures of authority who may be requested to give favors in return.

Staff must ask their supervisors or the Compliance Body if they have questions about whether to accept a gift or invitation or receive anything of value or advantage.

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

If a member of staff suspects or has proof of an irregular situation of this nature, they shall immediately bring the facts to the attention of their immediate supervisors or the Compliance Body so that the appropriate measures may be taken.

CETT Group does not make direct or indirect donations to political organizations (nor to relatives or close associates of political organizations) or politicians. All contributions 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 staff members 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

Staff will actively avoid any behavior that may be classified as money laundering or financing of terrorism and will collaborate with the courts and administrative bodies when necessary. 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 that are not in line with the nature of the transaction.
- 
- 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 made using a different currency to the currency expressed in the contract or bill.
- 
- Payments done to or by third parties not present in the contract.
-

As stated before, should staff have any questions, they must speak to their supervisors or the Compliance Body. Should any employee learn about an inappropriate situation of this nature, they 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 behavior.

## 6. Social Security and Tax Revenue

CETT Group and the companies of the Group declare that any conduct that attempts to avoid compliance with tax obligations or to obtain benefits to the prejudice of the Public Treasury, Social Security, and other equivalent public bodies is forbidden.

Likewise, our staff is 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 critical economic transactions are thoroughly recorded and kept in the ledgers and that these financial operations are faithfully recorded. To achieve this, all current accountancy principles, regulations, and recommendations will be followed.

Any unlawful payment made by any member of CETT Group staff with access to financial assets will be severely sanctioned. In addition, any economic operation which uses CETT Group's funds must meet the following criteria:

a) It is related to the goals of any legal entity that is part of CETT Group or follows the Group's principles of Corporate Social Responsibility.

- b) Any quantity spent is reasonable according to current financial and marketplace criteria.
- c) It has been authorized by the relevant member.
- d) Any payment must be made 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 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 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 regulations):

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



Electronic devices like telephones and computers will always be used for 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 correctly used or authorized. Hence, unauthorized software, dangerous downloads, or inappropriate behavior that may endanger our cybersecurity or violate 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.

The image, brands, and reputation of the CETT Group will be preserved, cared for, and protected by the personnel in developing their professional activities. Staff will avoid any conduct that could damage or put at risk the Group's image, brands, and reputation.

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 the Groups' 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.

On the other hand, the acquisition of goods and services will always be carried out under conditions that guarantee transparency and objectivity and that prevent conflicts of interest.

CETT Group highly respects 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 licenses should the use of copyright-protected information be required.

## 9. The environment

CETT staff treat the environment with the utmost respect and contribute to sustainable development by reducing or radically avoiding negative impacts and helping reduce the effects of climate change. Therefore we are committed to complying with all current environmental regulations, minimizing environmental impact, and preventing pollution derived from our activities, products, and services of the CETT Group, seeking ever greater efficiencies in the consumption of resources, applying energy and water conservation measures and progressively increasing the use of renewable energies. We are also committed to managing waste appropriately, prioritizing reduction and recovery.

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

## 10. Goods trading

Under no circumstances will our staff 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 a conflict of interest.

## 11. Staff training

Our personnel commits to actively participate in the training programs offered by the CETT Group, as well as to develop an ongoing learning process to ensure the commitment of the entire CETT Group team to excellence in teaching and human resources.



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

## 12. Human rights and civil liberties

Our staff is 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. We are particularly committed to the rights that refer to the protection of children and minority groups.

Under no circumstance will our staff collaborate or cooperate with organizations that do not respect human rights or civil liberties.

We will devise and offer training programs to support our staff in human rights-related issues, and we will help disseminate knowledge of these rights. Our team will be committed to taking part in these programs.

## 13. Equality and protection against discrimination

Staff must treat each other respectfully and avoid aggressive, discriminatory, or offensive behavior, sexual harassment, and abuses of authority.

## 14. Prevention of work harassment

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

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

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

## 15. Other obligations

Staff is 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 critical decision-making, they must ask line managers or the Compliance Body.

## 5. MONITORING AND ASSESSING COMPLIANCE WITH THE CODE OF ETHICS AND BEST PRACTICE. ETHICS CHANNEL (CANAL ÈTIC)

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

Failure to comply with this Code of Ethics and Best Practice will lead to the application of disciplinary measures or any other type that may be deemed necessary. These non-compliances can be detected through the different means the CETT Group makes available to its personnel and stakeholders who wish to use them for the purposes outlined in this Code. Staff are committed to actively collaborating with the Organization and any external auditor or advisor concerned with compliance with this Code, reporting any possible non-compliance they may be aware of. CETT Group provides staff and stakeholders with the following channels to notify and prevent possible misconduct:

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- Canal Ètic (Ethics Channel) or report to the Compliance Body. The Canal is a highly effective means; staff and stakeholders can communicate confidentially and safely any wrongdoing that may occur within the Organization.
- 
- Staff and stakeholders can also approach the Compliance Body through these means: -  
Telephone: 93 428 07 77.  
Email: [canaletic@cett.cat](mailto:canaletic@cett.cat)  
Postal address: av. de Can Marcet, 36-38,  
08035 Barcelona.
- 

On the other hand, we offer staff and stakeholders the option of consulting the Legal and Human Resources Department should they have any questions regarding the applicable legislation in cases of non-compliance with 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 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 will staff ask other staff members or stakeholders to infringe the principles of the Code; cases of staff violating 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 staff will be considered a serious offense and a violation of good contractual faith; in such cases, the essential facts will be analyzed and sanctioned following the applicable disciplinary measures established by our internal norms, collective bargaining or existing labor law regardless of possible consequences that the application of such sanctions may carry.

Barcelona, 20th June 2016

Revised: 25th Novembre 2022



## Questions and Suggestions

Do you need help understanding or using the Code of Ethics and Best Practice? Do you have any questions or suggestions? If that is so, please get in touch with your immediate supervisor or the Compliance Body. When problems happen, open collaboration and cooperation are vital to solving them.

Should you have any further questions or suggestions, there is an email address you can use:

**canaletic@cett.cat**

If you want to know if a specific behavior complies with the CETT Group Code of Ethics and Best Practice, you can refer to the questions below. Use these questions as a guide if you are unsure of the ethics of an action or transaction:

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



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