

som
—fundació

CRIME PREVENTION PROGRAM

Code of conduct

ANNEX. CODE OF CONDUCT SOM – FUNDACIÓ

1. INTRODUCTION

In the current frame of the new regulation demands, Som – Fundació has set up a System or programme of prevention of crimes. A key instrument in this System is the promulgation of a code of behaviour. With this code, however, the entity does not only want to satisfy the current legal standards, but it tries to go further on and wants to set up a whole culture of respect and promotion of ethical standards.

The project and the mission are strongly rooted in the basic principles and values of our culture.

The approval of this code of conduct represents a further step in this direction and gives visibility to the strict commitment of the entity with the society, its needs and its values. All the people who participate in the project of Som – Fundació are committed to this project. Everybody has the compromise in the good way of the organisation, its reputation and its future.

2. CODE ADDRESSEES

This Code of conduct tries to establish the principles and norms that must rule, compulsorily, the behaviour of the people who work for the entity: workers, directors, patrons, and volunteers.

The entity aim is that all these ethical guidelines help to guide the action of the rest of the people and organisations that are in its area, and within the activity sector: users, families, providers, benefactors, sponsors, collaborators, and entities of the sector, among them. With this purpose in mind, the entity will promote and encourage everybody to respect this Code.

3. ETHICAL VALUES

The mission of Som – Fundació is to defend the rights, protect, and ensure the quality of life of the persons with intellectual disabilities or development and modified capacity in Catalonia. All of this includes to ensure that these persons have the required help and support to be able to develop their personal project along their life. The entity commits itself in the

fulfilment of this mission with essential values that are an integral part of our culture, such as:

1. HUMAN RIGHTS. - Respect to the Universal Declaration of Human Rights is basic, with special emphasis in the respect of the dignity and intimacy of the person and respect to the equality of the persons and their diversity.
2. CORPORATIVE SOCIAL RESPONSIBILITY. - The sensitivity towards social and environmental matters has always to be present in the performance of the persons and organisations. Concepts such as justice and equity in the distribution of resources, the promotion of a sustainable economy that respects the environment and social rights and the collective of workers are key matters.
3. FULFILMENT OF LEGALITY. - Always and, without exception, law must be respected, and not only the letter of the law, but its spirit.
4. INDIVIDUAL ETHICS. - In the taking of decisions and actions, integrity, objectivity, impartiality, and transparency must prevail.

4. WHICH OBLIGATIONS DO I HAVE CONCERNING THE CODE?

<p>1. GET TO KNOW THE CODE AND ACOMPLISH IT. - You must respect the guidelines of behaviour of the Code. There is not exemption of liability of infringing behaviour for the fact that it has been ordered by a superior.</p> <p>2. WHEN IN DOUBT, ASK. - The Code cannot foresee all the possible situations or</p>	<p><u>TEST OF DOUBT. WHEN IN DOUBT , ASK YOURSELF:</u></p> <ul style="list-style-type: none"> • Which impact would have my behaviour over the people affected by it? • What my family and friend would think of my behaviour?
--	---

<p>behaviours. So, when you have any doubt, ask a:</p> <ol style="list-style-type: none">a. A superiorb. An interlocutor of the Area of Human Resourcesc. The responsible of the Regulation Complianced. The Claim Channel <p>3. DO NOT TOLERATE THE NON-COMPLIANCE OF THE LAW OF THE CODE. IT IS COMPULSORY TO COMMUNICATE THE NON-COMPLIANCES OR THE RISK OF NON-COMPLIANCES. In case of having knowledge, clue or suspicion of any legal infringement (or risk of any infringement) of the Code, you must let it know through one of these ways:</p> <ol style="list-style-type: none">a. A superiorb. An interlocutor of the Area of Human Resourcesc. The responsible of the Regulation Complianced. The complaint channel. If, for any reason, you think that these above means are not the appropriate way,	<ul style="list-style-type: none">• How would I feel myself if my behaviour were made public?• How would I feel myself or how were others affected by that behaviour?
--	--

you can communicate with the Claim Channel through an email compliancepenal@somfundacio.org or to tel. 936 348 476.	
--	--

5. TERMS AND DEFINITIONS

Here you are a series of terms definitions used in the Code. They will be given a different meaning from the usual:

- **Customers.** - This term must be understood in a broad sense that comprehends, mainly, users of services or goods, their families, benefactor, or sponsors, whether they are direct receptors of the services or goods, because they are persons who contract and/or pay the services or goods, or because they are persons who give donations or sponsor the entity. In spite of the fact that currently the Foundation does not receive direct contribution from the users, we cannot discard that, in the future, this fact can change. Therefore, we understand that the norms relative to users will refer as well to this eventual and would be hypothesis.
- **Providers.** - This term must be understood in an abroad sense that comprehends, mainly, providers, in a strict sense, of services, works or goods, as well as physical or juridical persons that have established a link of gainful collaboration with the entity.
- **Professionals.** - This term must be understood in an abroad sense that comprehends, mainly, workers (employees or autonomous), managers and directors, members of the patronage, and volunteers.

6. BEHAVIOURAL PATTERNS WITH PERSONS WITH INTELLECTUAL DISABILITIES OR DEVELOPMENT

6.1. EQUALITY

It deals with persons with intellectual disabilities or development (from now on, persons with DID) with equality and without discrimination, whether for reasons of gender, capacity, ethnic, religion, politics, or sex. To respect their equality means, as well, to appreciate their diversity and recognise affectingly their singularity.

6.2. FREEDOM AND SELF DETERMINATION

It respects their freedom of decision and action and promotes their self-determination. Only are admitted those restricted measures of this freedom that, apart from pursuing the superior interest of the person with DID, accomplish these conditions:

1. Measures that pursue to preserve their rights and those of third parties.
2. Measures that are necessary, suitable, and proportional.
3. Measures derived from their decision or action, whose consequences are not easy to understand by people.
4. Those measures that in case they were understood by them, would be accepted. In these cases, the measures must be coherent with the interests, wishes and needs of the person.

6.3. DIGNITY AND INTIMACY

It respects, always, the dignity and intimacy of the persons with DID. Especially:

1. Do not tolerate any form of stigmatisation, disparagement, or offence.

2. Do not take any photos, without a previous generic authorisation of the person, or when required, of his/her parents or tutors. You must inform them of the rights to accede, rectification, cancelation or opposition.
3. Obligation of asking for specific permission to the person just before taking the photo.
4. Photographs can only have relationship with the activity of the entity in order to fulfil their finality.
5. Do not take photos that may be dangerous for their dignity or integrity.
6. Once the photos are taken, transmit them in a safe way to the person responsible of the entity and delete them from the devices they were taken.
7. Do not use or look at the mobile or e-mail without their permission, or that of her parents, or tutors.
8. Do not open correspondence or any communication addressed to the users without their permission, or the permission of their parents, or tutors.

6.4. PHYSICAL AND PSYCHICAL INTEGRITY

Do not attack the physical or psychological integrity of a person with DID. Report the situations of ill treatment, vexatious treatments or any other abusive or unfair situation.

7. BEHAVIOURAL PATTERNS WITH COMPANIONS

7.1. DISCRIMINATION AND HARASSMENT

1. Do not discriminate or tolerate discrimination of any companion whether it is for reason of gender, capacity, ethnics, religion, politics or sexuality.
2. Do not harass or tolerate sexual, labour, or personal harassment to any of your companions.

7.2. PROCESSES OF SELECTION AND PROMOTION

1. In the processes of selection and promotion of workers, only the criteria relative to capacities, abilities and merits of the candidates will be taken into consideration.
2. Do not contract civil servants or politicians that participate or have participated in relevant affairs that affect to the direct interests of the entity. This may be extended to their close relatives (couples or persons with an analogue affective relationship, their children, brothers, uncles, aunts, cousins or brothers in law).

8. BEHAVIOURAL PATTERNS RELATED WITH THE ENTITY

8.1. ACCOUNTABILITY AND DOCUMENTATION

Enter the income, expenses, and operations with reliability and accuracy. Do not ever indebtedly miss, hide or change information. Keep safe the documentation and registrars. It is very important that the entity and third parties can get to know and verify, when necessary, the reality of its economic and financial situation.

8.2. SIMULATION OF OPERATIONS AND DISTORTION OF DOCUMENTS

Do not participate or tolerate any simulation of operations or distortion of documents, because it is a mean frequently used to cheat, defraud, or corrupt Providers, Users and Administrations.

8.3. JUSTIFIED, AUTHORIZED, DOCUMENTED, AND ACCOUNTED EXPENSES

1. The expenses you make in the exercise of your professional functions must answer to services, which have been effectively done or to goods delivered, and with an economical legitimate purpose.
2. Do not get rid of the authorisation of any responsible of the entity when prescriptive.
3. When you have to decide discretionality the import of the expenses, be sure that this is proportional to the finality and to the possibilities of the entity.
4. Every single expense, without any exception, must be documentally justified. You must always communicate the expenses and deliver their justification in order to be accounted.

8.4. USE OF RESOURCES AND EMAIL

1. Do not use the resources and email of the entity for private use. You can only use them in particular cases and in a moderate way without causing prejudice to the entity or third parties. The entity can monitor and revise the use you make and the information you keep in the files or the information you have transmitted.
2. Do not ever alter or delete data or electronic documents or computer programmes, or either put obstacles or interrupt computer systems of the entity or third parties.

8.5. INDUSTRIAL AND I INTEL·LECTUAL PROPERTY

1. The result of your intellectual ask (inventions, programmes, processes, technics, systems, concepts, ideas, etc.) is property of the entity. Do respect it and protect these actives, property of the entity.

2. Respect the industrial and intellectual property of third parties. Especially:
 - a) Don't unload illegally music, films, pictures, or other protected contents with copyright.

 - b) Don't unload or use software without a licence.

 - c) Don't use brands that infringe the rights of intellectual property of third parties to distinguish the products or services in market.

 - d) Do not reveal or use company secrets or know how of third parties (p. ex. Lists of clients, technics, systems, reserved information of products or strategies). And do not tolerate, allow or incentive that other professionals of the entity do so. When in doubt, and considering if the information constitutes a company secret or know how of third parties, consult to the legal services or to the Responsible if the Regulatory Compliance.

8.6. DATA PROTECTION POLICY

Do keep safely the personal data to which you have access and do use them respecting the norms, policies, protocols, and controls adopted by the entity. Protect them from the undebted use of third parties.

8.7. CONFIDENCIALITY

All the information about Users, Professionals, or third parties with reserved or private character is confidential. Keep it safe and protect it from the access of third parties, even after the end of your relationship with the entity.

8.8. PRESENCE IN THE SOCIAL NETWORK

1. When you publish information or any opinion in the social network as worker of the entity, do it with caution and common sense and make sure that you do not damage the image, dignity, intimacy or reputation of anybody. Do not upload photos without previous authorisation of a superior or following the policy approved by the entity.
2. When you publish information or any opinion of your own, do not mention your condition of worker of the entity or make any reference that allows linking you with the entity.
3. Do not publish or upload photographs on your own to the web or to social networks: This only can be done by the person responsible of the entity.
4. If you are responsible of the social networks, in the profiles opened by the entity, do apply filters of control of the publication of contents of third parties, in order to control that they are adequate.
5. When you publish information or opinion on your own behalf, do not mention your status as worker of the entity or make any reference that allows you to link to it.

8.9. CLANDESTINE IMMIGRATION

1. Do not help to enter or transit around Spain to persons who do not belong to EU, infringing the law about foreigner's residence.
2. Do not help to remain in Spain to persons who do not belong to EU, infringing the immigration law.

9. BEHAVIOURAL PATTERNS COMMON TO PROVIDERS AND USERS

9.1. CONFLICT OF INTERESTS

1. Do not take decisions, participate or influence in the decision making process in matters that involve conflict of interests with the entity, Users, or Providers. The conflict of interests exists when there is a collision, direct or indirect, between personal interests and those of the entity, Users, or those of the Providers. There must be considered personal interests those relative to persons who have relationship with oneself, such as close relatives, companies, or entities in which one has relevant participation, direct or indirect. We understand by close relatives: couples or persons with an analogue affective relationship, their children, brothers and sisters, uncles and aunts, cousins, nephews and nieces, or brothers and sisters in law.
2. When you find yourself in a conflictive situation of interest, report it to your superior or responsible of the Regulatory Compliance. Do fulfil the obligations of communicating of conflicts of interests that the entity might establish in the normative of internal policies.
3. Do not participate, direct or indirectly, in organisations that are users or providers of the entity of the entity without informing to your superior, to an interlocutor of the area of Human Resources or to the organ of government or administration. Don't divert inappropriately any business or activity of the entity towards third persons.

4. Don't take advantage, on your own profit or other persons' close to you, an opportunity of business of the entity. We understand by opportunity of business the possibility of carrying out an economic activity that has turned up or has been discovered thanks to the tasks carried out in the entity or through means and information of the entity.
5. Don't use the name of the entity or invoke your condition of being part of the entity to favour inappropriately the completion of private operations or activities.

9.2. OFFER, PUBLICITY AND CONTRACT OF SERVICES

The offer, promotion, or publicity of services to Users or compensations and commitments with Providers must be sincere and honest and must not induce to confusion or cheat. You must always inform Users or Providers with truthfulness, transparency, and without missing the conditions and characteristics of contract that might be projected to be carried out. When in doubt, if the publicity might be unlawful, consult to the legal services and/or to the Responsible of the Regulatory Compliance.

9.3. FAITH IN THE FULFILMENT OF COMMITMENTS

Be sure that the entity fulfils its commitments with Users and Providers with honesty and good faith without taking advantage of their weakness or vulnerability or their gaps or deficiencies of their contract.

9.4. SELECTION OF PROVIDERS

In the processes of selection of Providers, you must respect the principles of transparency, objectivity, no discrimination and confidentiality.

1. Transparency forces the processes of selection of Providers to be open to a plurality of Providers, and allows the selection to be reserved or secret. Transparency forces

as well to not deny the opportunity of presenting the offer to any Provider interested that fulfils the necessary requirements.

2. Objectivity forces to select Providers based on criteria related with objective characteristics. Objective characteristics of the very same Provider (among them, experience, economic solvency, technical solvency, satisfaction of ethic requirements, environmental, social, or territorial, availability, and commitment criminal legislation) and objective characteristics of their products or services (mainly, quality and price , but delivery or execution deadline, facilities of payment, technical service, post-sales service, maintenance and other similar).
3. Non-discrimination forces to not discard or select a prior or, in an arbitrary way, to any Provider. All of them must have the same opportunities in the selection process and with the guarantee that all the offers are weighted averaged in an equal and even minded way, and without unjustified favouritisms.
4. Confidentiality forces to not reveal to any Provider the offer of others participating in the selection process.

9.5. ILLEGAL COMISSIONS

1. Don't demand or accept, direct or indirectly, payments, advantages, or compensations that might aim to influence your decisions in order to favour unduly to third parties related with the activity of the entity.
2. Don't offer or carry out, direct or indirectly, payments, advantages, or compensations that might aim to influence in the decision of third parties related to the activity of the entity in order to favour unduly you or the entity.
3. Inform the entity about any clue or proof of this type of behaviours in the same entity.

4. The entity will not accept donations from its providers. Do watch in order to ensure that this commitment is fulfilled.
5. Donations from companies are welcome, but do not allow that these ask you or offer recommendations or give advice about the products or services of the benefactor company.

9.6. POLICY OF PRESENTS OR COMMERCIAL ATTENTIONS

1. Don't offer or accept, direct or indirectly, gifts from Providers or Users.
2. The prohibition or offering or accepting gifts has, as an exception, those gifts or commercial attentions of value under 150€ that happen in circumstances socially accepted as courtesy practices. The gifts given or taken between two persons cannot be, altogether, over 150 € a semester.
3. In no case cannot you accept or give gifts in cash or equivalents (gift cards, for example) not even in those cases contemplated in the preceding sub-section.

10. BEHAVIOURAL PATTERNS WITH ADMINISTRATIONS, AUTHORITIES, AND POLITICIANS

10.1. TRANSPARENCY AND COOPERATION

1. Act with honesty and integrity in all your contacts, managements and actions before authorities, civil servants, being sure that all the information, certifications and declarations that you make are truthful, clear, and without omissions.

2. Don't put obstacles to the functions, actions or demands of information required by civil servants in the legitimate exercise of their faculties and while they correspond in full to the valid legal situation.
3. Comply with the administrative and judicial resolutions, whether they have executive character or whether they affect to the entity, Professionals, Providers, or their Users; except in case their execution is suspended.

10.2. BRIBES AND GIFTS

1. Don't offer or carry out, direct or indirectly, payments, advantages, or compensations that might aim to influence the decision of third parties related to the activity of the entity in order to favour indebtedly you or the entity.
2. Inform the entity about any clue or proof of this type of behaviours in the same entity.
3. Don't offer, direct or indirectly, gifts to civil servants, politicians, or authorities, unless these are under the circumstances and limitations regulated in the Policy of Gifts and commercial Attentions of this Code.

10.3. INFLUENCE PEDDLING

1. Don't take advantage of a personal or confidence relationship or of anybody around you with a civil servant or an authority to influence them and obtain a decision that may generate, direct or indirectly, any economic profit for the entity or third parties. The previous behaviour is prohibited as well, although the civil servant or the authority or the person who influences in them receive nothing at all.
2. Don't demand payments, gifts or favours to make use of your personal or confidence relationship with a civil servant or authority to influence them with the finality above mentioned.

10.4. TAX OBLIGATIONS AND SOCIAL SECURITY

1. Develop your professional activity in a way that the entity accomplish integrally and correctly its tax obligations and avoid any practice that supposes to avoid illicitly the payment of taxes.
2. Develop your professional activity in a way that the entity accomplish integrally and correctly with the obligations with the Social Security and avoid any practice that supposes to avoid illicitly the payment of taxes.

11. BEHAVIOURAL PATTERNS RELATED WITH MARKET AND COMPETITORS

11.1. OPEN MARKET AND UNFAIR TRADE

1. Don't make agreements with competitors about prices, volume of production, market sharing, boycotts or any other practice which alters the open trade.
2. Don't apply practice of abuse of the dominant position of the entity or unfair trade that jeopardise other competitors or consumers.
3. Information to third parties, especially to competitors, must be obtained in a legal manner. In any case, you must ask, accept, or use reserved, confidential or secret information belonging to third parties.

12. BEHAVIOURAL PATTERNS RELATED WITH SOCIETY

12.1. MONEY LAUNDERING

1. Watch to ensure that the entity does not carry out operations in which money from illicit or crime origin is used.
2. Especial attention must be taken in unusual operations such as:
 - a) Payments or charges of a high import in cash or in checks to persons, entities or bank accounts located in tax havens.
 - b) Payments or charges to third parties unmentioned in the contracts or done by extraordinary operations not written in the contracts.
 - c) Impossibility of identifying the real account holders of the participants in the operations or when these do not have a real activity, but only apparent.
3. Inform the entity before any clue or proof of this type of activities or any other which may result suspicious or with clues of being irregular or illicit.
4. Apply the policy and protocols that may approve the entity to prevent money laundering.

12.2. CURRENCY FORGERY

When you receive cash money and later you detect that it is fake money, don't use it afterwards to do any payment. Inform your superiors so that they can keep the fake money and report to the authorities.

13. BEHAVIOURAL PATTERNS RELATED TO ENVIRONMENT

1. In your professional activities, have a responsible behaviour with the environment.
2. Apply the policy and protocols that the entity may approve about environmental conservation in order to achieve the sustainability objectives of the entity.

14. APPLICATION OF THE CODE OF CONDUCT

14.1. COMMITMENT OF NORMATIVE AND ETHICAL COMPLIANCE. OBLIGATIONS OF THE ADDRESSEE OF THE BEHAVIOURAL CODE

- 1. Commitment with the entity.** - The entity, with its Patronage leadership, commits itself to develop its activity with full respect to the general and sectorial legality applied to it, as well as with the ethical principles and behavioural patterns contemplated in this code.
- 2. Obligations of the Professionals of the entity with third parties.**- Workers, members of Patronage, as well as third parties related with the entity (where applicable or possible) have the following obligations towards this code:
 - a) Comply with the Code of behaviour.** To get to know and comply the patterns of behaviour established in the code of Behaviour. It does not exempt liability the fact that the behaviour has been ordered by a superior.
 - b) When in doubt, ask.**- When in doubt about the correction of a certain behaviour, ask to:
 - A superior,
 - An interlocutor of the Area of Human Resources,

- A responsible of the Normative Compliance,
- A Claim Channel.

c) Don't tolerate the infringement of the Code of Behaviour. Obligation of reporting the infringements.- - In case of having a clue or suspicion of any legal infringement (although they come from areas, services or functions outside your control), you must report through one of these ways:

- A superior,
- An interlocutor of the Area of Human Resources.
- A responsible of the Normative Compliance.
- A Claims Channel. If, for any reason, you think that the above mentioned ways are not the appropriate, you can report the infringement through Claims Channel of the email: compliancepenal@somfundacio.org or to tel. 936 348 476.

14.2. CLAIM CHANNEL

- 1. Internal and external communication y externa.** - The Claim Channel is a communication way, which is at the disposal of the Professionals of the entity and third parties related with the entity (users, families, collaborators, providers, benefactors, sponsors, and other entities of the sector, civil servants, or authorities).
- 2. Objective.-**The channel has as main objective to solve doubts about the ethical or legal correction of any act of behaviour. Another objective to receive communications of legal infringements (or the risk of having infringements) in order to verify the facts and adopt the appropriate measures.

3. Functioning. - The Claim Channel is managed by the Responsible of the Compliance Normative with the support of external professionals. These persons process and solve legal or ethical doubts and possible claims. The principles and doubts that will rule the process and resolution of doubts of claims are:

- a) The law does not allow anonymous claims. The fact that the claimer must be identified means that his/her identity may be made published. Thus, the confidentiality of the identity claimer will be held with the only exceptions contemplated in the law and when it is indispensable to investigate the fact claimed.
- b) The investigation and verification of claimed facts must be carried out with objectivity, impartiality and the outmost discretion and possible reserve.
- c) The investigation of facts must be compulsory, as well as the matter of keeping the confidentiality of the information related to the facts investigated.
- d) If a person is author or participant of infringing facts and he or she is the first to claim the facts, the following benefits will be applied to him /her:
 - If he or she is the only responsible, the penalty provided by the law will be reduced, according to the cases.
 - If there are several responsible persons, and he /she is the first person to claim the infringement, the penalty provided by the law will be reduced, according to the cases.
- e) Independently on the above mentioned benefits, the Criminal Code contemplates mitigating criminal penalties for those authors or participants of a crime that inform about a crime to the authorities, repair the damage to the victim, or reduce their effects.

- f) Claims will be filed when facts result to be false or cannot be demonstrated (without prejudice to the right to report to the authorities when the claimed facts are similar).
- g) No retaliations will be permitted against the penalties or the claimer, or even when the facts will result to be false (except when the claims were presented in bad faith or conscious of their falsehood).
- h) Once verified the truthfulness of facts, the adoption of penalties and corrective measures will be adopted, and the facts will be reported to the authorities when legally perceptible. The facts, that, in spite of not having been verified, do have similar existence, will be reported as well to the authorities.
- i) Once the process is finished, the results will be communicated to the claimer and to the accused.

4. Responsible of the Normative compliance

The entity has designed a Responsible of the Regulatory Compliance that, by delegation of the patronage, has the function of supervising, with independency and objectivity, that the persons of the entity (and other addressees of the Code of Behaviour (where applicable or possible) fulfil faithfully with the normative of this Code. With this finality, the Responsible will help to promote the knowledge and compliance of this Code as well as to solve the doubts derived and will manage, as well as, the Claim Channel.

5. Disciplinary Regime and measures of reaction

- **Workers and directors.**- The non-compliance of the Code of Behaviour by workers or directors will be punished. The law and the collective convention applicable to the entity determine the penalties that may be imposed and the process to carry it out.
- **Members of the Patronage.** - The non-compliance of the Code of Behaviour by the members of the patronage will be punished through the application of disciplinary measures that may have been determined by the statutes of the entity.
- **Third parties.** - The non-compliance of the Code of Behaviour by third parties related to the activity of the entity will carry out the corresponding legal and contractual consequences and that, eventually, have been determined in contracts, agreements, or subscribed with them. The entity will promote the above mentioned measures of contractual and legal reactions, when applicable and possible, against these third parties.

6. Other penalties and legal consequences

The penalties laid down in the previous article do not exclude the application of other penalties, like for example, the criminal ones, and other legal consequences when the law determines so.

7. Dissemination of the Code of Behaviour

The preventive efficacy of the Code of Behaviour requires that the Professionals of the entity and third parties related with the entity have the knowledge of its existence and content. In order to determine the level and scope of dissemination of the Code of Behaviour, the following rules are established:

- a) The Code of behaviour will be made public in its whole integrity through the means mentioned below. Without prejudice, additionally the entity will be able to promote the knowledge of the Code of Behaviour, disseminating extracts, summaries, synthesis of them through the same means, or others considered appropriate.

The means to make public the above mentioned information are:

- Website. - It will be included in the website of the entity in a tab named "Transparency" that will contain a section with the above mentioned information.
- Email. - There will be an email addressed to the members of the Patronage, the professionals of the entity, providers and volunteers, in which they will be informed about the existence of the code of Behaviour and there will be an adjunct integral copy of it or a link that enables the access to internet. This type of deliveries will be repeated at least once a year whether there have been any modification of the Code of Behaviour or not.
- Delivery of the Code of Behaviour. - The entity will deliver personally the Code of Behaviour to the professionals of the entity personally, collecting their signature as a proof of their reception. This type of deliveries will be repeated at least once a year whether there have been any modification of the Code of Behaviour or not.
- Subscription to terms and addenda to contracts. – In the contracts, agreements or current conventions with third parties related with the entity, there will be the possibility of setting up terms by means of an addenda in which those parts involved acquire the commitment of compliance of the ethical prescriptions of the Code of Behaviour – those that affect to the relationship and activity of both organisations –and the commitment of claiming the infringements of the same through the Claim Channel. In future contracts, agreements or conventions, there will be a requirement of acceptance of this type of terms as a condition sine qua non for the subscription of these documents. Only on rare or exceptional occasions, will the entity renounce to these terms.