

Ethical code



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1. Introduction

The Nous Cims Private Foundation is a non-profit organisation set up in Barcelona in 2015 with the mission of **promoting innovative programmes with a demonstrable impact on the lives of the most vulnerable people and their communities.**

We identify unmet social challenges or those with room for improvement, from which we develop transformative projects and we are committed to the **generation of knowledge** as a strategy for training and strengthening the sectors in which we work: employability, emotional well-being and global development.

To achieve this, at Nous Cims we promote an ethical culture of the organisation marked by professionalism and responsibility, always **acting for the benefit of the people impacted and with absolute respect for the current legislation.**

This Code of Ethics aims to be a **compendium of the principles, values and general guidelines of conduct** that must guide and orientate the behaviour of the universe of people involved in the present and future of the Foundation within the framework of their activities and work and professional obligations.

We drive transformational change, one person at a time, with non-conformism and commitment.

2. Values



Humility

Understood from the acceptance of our own limitations and the recognition of the key role that all the actors with whom we collaborate have for us.



Professionalism

We are driven by vocation, enthusiasm and commitment, and we strive for **quality and thoroughness** in our day-to-day work. We encourage continuous training as an axis of growth and specialisation, and we do so while enjoying every step of the way.



Innovation

We are curious and have a non-conformist spirit. We make systematic use of approach methods and problem analysis based on **continuous and disruptive learning** so that all projects include aspects of improvement on previous experiences.



Empathy

We like to listen, understand and **accompany from proximity**.

3. Founding Principles

1. People at the centre

We believe that everyone deserves the opportunity to thrive and we understand that behind every project there is a personal story of empowerment.

We start from the premise of respect and dignity of people, we always **act for their benefit in conditions of equity and equality** and we guarantee their rights, whatever their situation.

2. Measuring impact

We **monitor and evaluate** all projects, enabling us to provide empirical/scientific and independent evidence of the impact of the Foundation's programmes, thus enabling approaches based on what works and preserving the principles of independence, objectivity and transparency.

3. Sustainability

Our aim is for the impact to be truly transformative, with deep roots, and for it **to last both in the life trajectories of the beneficiaries and in the systems involved.**

We are committed to the training, capacity building and empowerment of the key actors in the communities we work with, and we seek to integrate the projects we promote into our portfolio of services to third parties.

4. Adding value and the principle of non-duplication

We start from a **complementary view of public administrations and other private initiatives**, and work in collaboration with existing networks with the aim of strengthening them through capacity building and producing new resources and knowledge that can be integrated.

5. Intersectionality

We understand that the precepts of equity, equality and guaranteeing people's rights are not viable without incorporating the perspective of intersectionality.

We work to **eliminate gender barriers** and promote the active participation of all people in all areas of life, thus contributing to a fairer society.

6. Environment

We are committed to reducing our ecological footprint, **promoting and applying efficient and sustainable practices to our projects**, as well as raising awareness of the effects of climate change and the importance of preserving our planet.

7. Respect for equality

We work to guarantee equal opportunities and respect for diversity in all our actions, promoting an inclusive environment free of any form of discrimination. We firmly defend non-discrimination in the workplace and reject any unequal treatment based on gender, nationality, religious beliefs, race or ethnicity, opinion, or any other personal or social condition or circumstance.



4. Scope and addressees

Ethical conduct is everyone's business, without exception. For this reason, this Code of Ethics is applicable to **all those who form part of the NOUS CIMS ecosystem**: beneficiaries and users, workers and direct collaborators, social entities and their staff, trustees and governing bodies and, in general, all the agents involved in the organisation's operations, including volunteers.

It is the responsibility of those who decide to incorporate external collaborators and/or services **to ensure that they share and agree with the principles of action** of this Code of Ethics.

4.1 Beneficiaries and users

The beneficiaries of NOUS CIMS will be those people who are within the object and purpose of the Foundation.

The Board of Trustees will choose the group of beneficiaries under criteria of impartiality and nondiscrimination among the people who meet the following circumstances: to have requested the benefit or service offered by the Foundation and to fulfil the specific requirements that the Board of Trustees may agree upon.

Given that the beneficiaries are an essential element of the Foundation's activity, channels will be set up to relate to them in a **participatory and transparent** manner.

The beneficiaries and users **must commit themselves to the values and principles of NOUS CIMS** included in this Code of Ethics and, in addition, they must comply with the applicable regulations.



NOUS CIMS expects from its users:

- 1**
Commitment
take responsibility for one's own progress within the program.
- 2**
Social return
positive and proactive attitude to help others.
- 3**
Caring and valuing
the materials and services provided.
- 4**
Personal growth
Establish personalised plans and implement them with dedication and interest.
- 5**
Fluid communication
Express their needs by establishing fluid communication with the corresponding social entities and/or NOUS CIMS or the closest environment (involvement of families and friends, etc.).
- 6**
To promote the Foundation
serve as ambassadors for the projects, sharing their experiences and helping to raise awareness of the work of NOUS CIMS.
- 7**
Facilitate contact with NOUS CIMS
during and after the projects, so that the Foundation can continue to support them and carry out a follow-up impact assessment.
- 8**
Use of the IT applications
offered by the Foundation to ensure contact and agile management.
- 9**
Respond objectively and carefully to the surveys
sent by the Foundation in order to contribute to the generation of learning.
- 10**
Positive and proactive attitude
that helps contribute to one's own happiness and that of others.

4.2 Employees and direct collaborators

Professionals selected on the basis of objectivity, merit and personal and professional skills are the most important asset of NOUS CIMS. For this reason, they will maintain a **permanent attitude of responsibility, cooperation and teamwork** with their colleagues. They will try to keep an open mind, making proposals and accepting those of others in order to constantly improve.

These people are expected to carry out the functions for which they have been hired, **with commitment**, following at all times the procedures and protocols established and approved by NOUS CIMS. They are also expected to participate in the training initiatives proposed to them.

Finally, professionals should feel **free and confident** enough to report concerns and make any proposals, always keeping in mind the continuous improvement of NOUS CIMS.

NOUS CIMS requires from its professionals:

- 1**

To dedicate their **working time, both in person and remotely, exclusively to professional matters**, always for the benefit of NOUS CIMS.
- 2**

Attitudes that could be considered, directly or indirectly, as harassment, illegal or corrupt in nature, as well as discrimination on grounds of nationality, religion, gender, disability, sexual orientation or social origin **will not be tolerated in any way** and will automatically be considered as a very serious infringement.
- 3**

Confidentiality. Among other things, they must safeguard their passwords, access cards and other electronic methods of access to information systems. Professionals shall be responsible for any negligent misuse of these means in their custody.
- 4**

Ensure compliance with the LOPD and the safeguarding of any **sensitive information** we receive from our beneficiaries, to guarantee confidentiality and security at all times.
- 5**

Prevent the dissemination of inappropriate information in the media, **strictly following established protocols for external communication.**
- 6**

Taking care of NOUS CIMS assets, such as installations, materials or IT tools.
- 7**

Pay continuous attention to possible intrusions (phishing, malware, etc.) on IT equipment and keep up to date with **cybersecurity** training and updates to protect the Foundation's systems and data.
- 8**

Follow the **security protocols** provided by the Foundation when travelling abroad to ensure their personal safety and the safety of their work.
- 9**

Devote time and effort to **internal evaluations and to training in accordance with the results of these evaluations.**
- 10**

Treat people with **respect and consideration**, and have a **positive attitude** towards others.

11

Admit mistakes with **transparency and humility**.

12

Accept constructive criticism (opinions) at all levels of the organisation and ask for/propose alternative solutions.

13

Maintain a **positive attitude**, always considering that others are acting in good faith.

From an eminently legal perspective, the professionals of NOUS CIMS have the following obligations derived from the Statute of Workers and the Law on Occupational Risk Prevention:

1. To observe the **health and safety measures** adopted by the Foundation.
2. To comply with the **obligation to work** assumed in the employment contract.
3. To act **diligently and collaboratively in their work** and day-to-day activities, subject to this Code of Ethics and other applicable regulations.

4.3 Collaborating social entities, staff and self-employed persons

NOUS CIMS develops part of its foundational activity through social entities and autonomous collaborators all over the world, with the aim of **generating impact, innovation and transformation** in the beneficiaries and their immediate environment.



This group must meet the following requirements:

- 1 Have **values that are coherent and compatible** with those of NOUS CIMS and be in agreement and aligned with the Foundation's backbone principles.
- 2 Promote an inclusive, respectful and non-discriminatory **work environment**.
- 3 **Avoid misuse of positions of influence for personal gain**, while maintaining an ethical and professional commitment.
- 4 Promote **transparency and respect** in all interactions, and ensure a smooth and safe relationship.
- 5 **Working together** to develop a project according to the strategic plan of NOUS CIMS and the social entity itself.
- 6 Agree on an evaluation plan and **put in the necessary resources and effort** to meet the plan and the established delivery time.
- 7 Agree on the **drafting of an agreement/contract**. Sign and comply with the established clauses.
- 8 **Continuous reporting** on the status of the project according to the terms of the agreement/contract.
- 9 Be **open-minded to innovation and continuous improvement**, and actively participate.
- 10 **Use the software applications** offered by the Foundation for a good interaction between the parties involved, as well as for a proper evaluation of the projects on the basis of the advice and good practices provided on cybersecurity.
- 11 Work in alignment with NOUS CIMS to ensure **long-term self-sustainability of projects**, promoting systemic change through close and continuous collaboration.
- 12 If the organisation has volunteer workers who deal with minors, these people **must hand in their certificate of Sexual Offences** or sign the appropriate authorisation so that the social organisation can process the certificate on behalf of the person concerned.

If the entity maintains a relationship with public administrations, a stable relationship must be guaranteed, based on **transparency, independence, collaboration, service, honesty and correctness.**

The entities with which NOUS CIMS decides to collaborate must comply with the **minimum legal requirements of constitution and operation and share values compatible with those of the Foundation.**

4.4 Relations with authorities, regulators and public administrations and public administrations

Any relationship with public administrations must maintain maximum transparency, honesty, correctness and compliance with the law. It is forbidden for people employed by NOUS CIMS, as well as collaborating entities, either directly or through intermediaries, to offer, grant, try to obtain or accept unjustified advantages or benefits that aim to obtain a benefit for NOUS CIMS,

for their entity, for themselves or for a third party. In particular, they may not give or receive any kind of bribe, commission or bonus from any other party involved, such as public sector officials or personnel, other companies, political parties or suppliers.

4.5 Unjustified advantages

The Foundation condemns the offer, acceptance, delivery, receipt or promise of gifts, favours or services to/from a third party in the name of the Foundation, as well as the receipt, request or acceptance of unjustified benefits or advantages with the aim of unduly favouring another person or entity in the contracting of services or commercial relations.

The target group of this Code of Ethics, i.e. beneficiaries, direct and indirect collaborators, the staff of the social entities, members of the Board of Trustees and family members may not give or accept gifts or presents in the exercise of their professional activity, except those that are signs of courtesy

or affection, are of an irrelevant or symbolic value (an amount of less than 50 euros collectively in a period of one year) and are not prohibited by law or by generally accepted practices.

No hospitality may be given or accepted that influences, could influence or could be interpreted as influencing decision-making. In case of doubt, or in the event of any circumstances not expressly stated in this section, as well as any exceptions to what has been established, the offer must be declined or, if applicable, the express written authorization from corporate management will be required.

4.6 Conflicts of interest

A conflict of interest is considered to exist in those situations in which the personal interest of the professional and the interest of the Foundation directly or indirectly collide. The professional's personal interest shall be deemed to exist when the matter affects him/her directly or a person to whom he/she is related.

In relation to possible conflicts of interest that may arise, professionals, employees and members of the Board of Trustees of the Foundation shall observe the following general principles of action:

Abstention

To abstain from intervening in or influencing decisions that may affect the Foundation when there is a conflict of interest; as well as to abstain from participating in meetings where such decisions are discussed.

Disclosure

To report conflicts of interest that arise in the course of their work to their immediate superior and/or to the Director of the Foundation or, in the case of employers, to the President.

4.7 Board of Trustees and governing bodies

The Foundation's Board of Trustees is the main body responsible for the entity. The members of the Board of Trustees act collegially and form a **selfless team with a spirit of service**, which ensures the aims and values of the Foundation, acting with loyalty.

The responsibility of the Board of Trustees is to **achieve the aims of the Foundation** while transmitting them to all the collaborators and to society in general.

All members of the Board of Trustees and governing bodies - who may be assisted by the necessary internal or external professionals - **must fulfil their organisational and supervisory responsibilities**, as they are responsible for the entire group of employees. In this regard, they must emphasise the importance of ethical conduct, integrate it into day-to-day activities and promote training in this area.

Among others, they have the following obligations:

- 1**
Select employees on the basis of **objective personal and professional qualifications**.
- 2**
Providing **clear, precise and binding instructions** to the collaborators, especially with regard to compliance with the law.
- 3**
Maintain a **positive, proactive and participative attitude towards the proposed** activities in order to be updated and make informed decisions that benefit the objectives of the Foundation.
- 4**
Ensuring that **compliance with the law** is continuously monitored.
- 5**
Clearly communicate to employees **the importance of applying the Code of Ethics** in day-to-day activities.
They should also indicate that non-compliance with the law is unacceptable and will result in penalties.
- 6**
Fostering **democratic, participatory and transparent governance**.
- 7**
Establish mechanisms that allow for the evaluation of the performance of the Board of Trustees and the development of the functions of the trustees.



5. Others

5.1 Suppliers, consultants and external partners

1. NOUS CIMS will select, through the comparison of different options, people (natural or legal), social entities that provide services, subcontractors and works, as well as external collaborators, according to objective criteria of quality and professionalism, avoiding any favouritism or interference of conflicts of interest in their selection, with the premise of **achieving an optimal use of the economic resources** of the Foundation. These figures will also have **values that are coherent and compatible** with those of NOUS CIMS.
2. NOUS CIMS formalise the corresponding contract for the provision of services, supplies and works with any supplier and/or habitual external collaborator, including in the corresponding contract a specific clause of **submission to and compliance with this Code of Ethics**.
3. **We will work together**, agree on an evaluation plan and **put all the necessary resources and efforts** to meet the established plan and timeframe.
4. In any case, the contracting of suppliers and external collaborators is **subject to the applicable regulations**, as well as to the internal management and action protocols of NOUS CIMS in force.

5.2 Asset and economic management

- Wealth management shall be **balanced**, taking into account performance and prudence criteria.
- The management of financial resources - both in their collection and application - must be **honest, austere and transparent**, while ensuring internal and external control mechanisms.
- The **budget shall be consistent with the aims of the Foundation**, both at the time of its adoption and during its subsequent implementation.
- In order to prevent irregularities in payments and money laundering, **it is prohibited to receive or transfer property** knowing that it is derived from criminal activity.

The management of assets and the activities aimed at attracting resources, as well as the economic and business activities that NOUS CIMS may carry out, **must be ethically compatible** with its purpose, with the fact that it is a Foundation and with its own values.

5.3 Donations

The Foundation will not accept financial or material funds from illicit activities or activities contrary to the founding values set out in this Code of Ethics.

Donations subject to conditions that violate any foundational objective or value, or that may compromise the independence of the Foundation, will not be accepted.

Under no circumstances will NOUS CIMS receive cash donations, except those legally made within the framework of events duly organised and authorised by the Foundation.

In any case, donations will be treated in accordance with the applicable regulations.

5.4 Data processing

NOUS CIMS protects the treatment of personal data, the privacy and the security of all the information it has, including especially the most sensitive, such as the bank details of the beneficiaries, suppliers, etc. The Foundation guarantees the **appropriate treatment of files containing personal data**.

Personal data will only be obtained, processed and used when strictly necessary to carry out certain clear and legitimate purposes. In addition, **personal data will be kept securely** and appropriate precautions will be taken for its protection, including in the IT area.

5.5 Corporate image and reputation

All persons affected by this Code of Ethics shall ensure the preservation of the image and corporate reputation of NOUS CIMS, as well as that of its founders and donors, taking the utmost care in their participations, interventions, communications and, in general, any public action.

5.6 Security

Protecting the health and safety of the people employed in the workplace is one of Nous Cims' priorities.

We are committed to adopting the necessary measures to look after the health of our staff and ensure their well-being, in strict compliance with the legal requirements regarding health and safety.

We continuously study possible risks, both physical and psychological, and take the appropriate measures to minimise them as far as possible.

It is essential that all employees work consciously and safely, free from influences that could compromise their ability to do so. In the event of witnessing or becoming aware of an incident or dangerous situation, it is the employee's responsibility to inform the management immediately and, if necessary, to take corrective measures.

6. Control and assistance organ. Ethics channel

The Code of Ethics requires, for its effectiveness, a **person responsible for Ethical Management**. This person will be the control body that will oversee its compliance and take the concrete and necessary measures to ensure the proper updating and implementation of the Code of Ethics. Additionally, they **will prepare an annual compliance report**, which will be submitted to the Board of Trustees of the Foundation. The Board of Trustees of NOUS CIMS may commission the relevant compliance audits of this Code of Ethics if it deems it necessary and/or appropriate.

The **Ethical Channel** is a confidential communication channel available to all NOUS CIMS staff and partners. If you have any questions or suggestions regarding the Code of Ethics, please contact the Compliance Officer (Head of Ethics).

Potential **complaints** that arise from possible violations of this Code of Ethics, internal development regulations, or any other breach of current regulations can be submitted.

As complaints will not be anonymous, the Complaints Officer (Legal) will maintain the confidentiality of the reporting person/complainant at all times, except if such information is required by an administrative or judicial authority.

Anyone wishing to file a complaint or report a violation of the code of ethics may use the Ethics (Complaints) Channel via the following link:

<https://talent-nouscims.factorial.es/complaints>

This report may be submitted either under your name or anonymously, and will be received and handled in a unique, independent, and confidential manner by the legal representative.



7. Sanctioning regime

The behaviors outlined in this Code of Ethics are the foundation of the commitments made by all individuals to whom it applies.

The violation of this Code of Ethics will result in a sanction proportional to the breach and its effects, in accordance with the applicable labor legislation, and especially the Workers' Statute and the applicable collective agreements.

This sanctioning regime will be complementary to any legal proceedings that may be directed against the professional and/or employee, in addition to any sanction or consequence that may arise from such proceedings.

Additionally, after a violation of this Code, the Foundation will conduct an analysis of the situation and the circumstances that may have facilitated the commission of the violation and, if necessary, will adopt new measures or make modifications to this Code to prevent future violations.

NOUS CIMS will not tolerate any form of retaliation against individuals who report alleged violations in good faith, and will sanction, in accordance with current regulations, those violations or breaches that constitute labor offenses, without prejudice to other responsibilities that may arise based on the specific circumstances of the case.

However, false or defamatory reports will be subject to disciplinary sanctions by the Foundation, in accordance with the applicable agreements and legal regulations.



8. Dissemination

This Code of Ethics of NOUS CIMS will be available for consultation on the Foundation's website and will be distributed to the Board of Trustees of the Foundation, to individuals in management positions, and to all staff, partner companies and organizations, suppliers, external personnel, and, in general, to all stakeholders involved in the operations of the Foundation, including the volunteer group of NOUS CIMS.

9. Validity

The Board of Trustees of NOUS CIMS, in the session held on October 19, 2019, approved this Code of Ethics and any other internal protocols that may be developed. It will come into effect on the day of its publication on the Foundation's website.

FINAL PROVISION. - The Board of Trustees will review this Code of Ethics four years after the date of its approval and will propose any necessary modifications.

Review 30/01/2024:

As stated in the Final Provision of the Code of Ethics, four years after the approval date, the Board of Trustees has reviewed the adequacy and validity of the Code of Ethics and has deemed it appropriate not to propose any modifications. The Board of Trustees commits to conducting a new review within another four years, without prejudice to the possibility of carrying out a total or partial review earlier if deemed necessary. NOUS CIMS reserves the

right to conduct checks, always in compliance with current legislation, to verify the application of this Code, as well as to prevent activities that may affect legal compliance, integrity, confidentiality, and availability of information.