

Code of Ethics

Documentation Control

Description

The purpose of this document is to establish a framework of values, ethical principles, and conduct guidelines that Lleida.net seeks to adhere to guide its operations and its employees' behaviour.

Historical documentation

Version	Date	Author	Description
1	17/06/2022	Compliance	First version
2	08/02/2023	Compliance	Version

Distribution list

Name	Company
Employees, providers and clients	Lleida.net

Classification

Document classification
Public

Related documents

Description	File	Tag

Contents

Letter from the CEO	5
Presentation	3
Purpose.....	3
Scope of Application	3
Dissemination and Compliance.....	4
Core Values of the Organization	5
Mission.....	5
Vision.....	5
Values.....	5
<i>Leadership</i>	5
<i>Trust</i>	5
<i>Sustainability and Responsibility</i>	5
<i>Accessibility</i>	5
Behaviours in Alignment with the Code of Ethics	6
Conduct of Directors	6
Conduct of Executives.....	6
Conduct of all professionals.....	6
Aspects Covered in the Code of Ethics	7
Compliance and Integrity	7
Conflicts of Interest.....	7
Anti-Corruption and Anti-Bribery.....	8
Prevention of Money Laundering and Financing of Terrorism	8
Fiscal and Financial Integrity	9
Relations with Third Parties	10
Market Relations	11
Employment Practices.....	12
Training and Communication	13
Information Security	14
Protection of Personal Data and Privacy	15
Trust service.....	16
Sustainability and Corporate Social Responsibility.....	17
United Nations Commitment.....	17
Information and resources	18
Information on policies and procedures.....	18
Whistleblowing channel.....	18
Follow-up and interpretation.....	19

How to deal with non-compliance..... 19

Letter from the CEO

A quarter of a century, 25 years, 9,125 days, 219,000 hours. Yonks ago? Probably for ordinary people, but not for us "lleidaneters"; for us is as if it was ... yesterday.

It is now 25 years since three friends, and I decided to create what eventually was the first Internet service provider in Spain, then came chats, SMS and electronic certification services. With subsidiaries in 14 countries, we are a multinational company enjoying a 25-year history and currently listed on three Stock Exchanges (BME Growth, Euronext Growth and OTC NY).

You might wonder how a company reaches its silver wedding anniversary. It's as sophisticated and simple as maintaining innovation and taking on new challenges daily.

Responsibility and sustainability are integral components of our approach. Since Lleida.net is a listed company, it must work to be profitable. Financial sustainability is a responsibility we hold towards shareholders, employees, and society. A responsibility that can only be understood by respecting the rules of the game, complying with regulations, and falling within legal frameworks. Those who play fairly and with integrity maintain their reputation and that of those who engage directly or indirectly in the project.

Companies are made up of people and it is their effort that has allowed us to get where we are. For this reason, Lleida.net wagers for quality employment with good working conditions and opportunities for all, regardless of age, ability, or sex.

We aim to build confidence in people and society. Trust is a perception that is strengthened over time. Therefore, we care about issues beyond our business's day-to-day operations. Our transparency in our operations, accreditation of our services by independent third parties, and participation in associations and forums are all aimed at creating value and trust in the market in which we operate.

We also aspire to create trust and value in society through volunteering to help the disadvantaged. Furthermore, we seek to foster community and respect through volunteer service to the disadvantaged. And, above all, promoting the defence of the Environment with prevention policies, fostering responsibility, and especially disseminating technologies with less environmental impact, which are the essence of our work.

All these are the values that have cemented our path in these years, and we still have things, many things, to do, so thank you very much to all of you! Here's to another 25 years!

Presentation

Purpose

Lleida.net strives for its conduct and that of its affiliated individuals to comply with current legislation, adhere to ethical principles aligned with the Company's values, and responsibly contribute to society, particularly in environmental matters.

This Code of Ethics outlines the values of the Lleida.net group for the development of an ethical culture and serves as a guide for the actions of the administrators and professionals of the Group of companies in a global, complex, and ever-changing environment. All companies within the Group, collectively known as Lleida.net, share these values and are bound by this Code.

In addition, the Code of Ethics has been developed considering widely recognised good governance recommendations in international markets and the principles of the Global Compact of the United Nations, to which Lleida.net adheres as a reference in human rights, labour, environment, and anti-corruption.

The Code of Ethics is also a commitment by the Company to the principles of business ethics and transparency in all areas of operation. It establishes principles and guidelines to ensure the ethical and responsible behaviour of all administrators and professionals at Lleida.net.

Scope of Application

The Board of Directors of Lleida.net approved the Code of Ethics on June 17, 2022, and it became effective immediately upon approval. It is binding on all companies within the Lleida.net Group (hereinafter referred to as Lleida.net).

This Code of Ethics is intended for directors, executives, and employees of Lleida.net (including external or temporary individuals) who have affiliations with Lleida.net, regardless of the legal nature of their relationship (hereinafter referred to collectively as professionals).

Additionally, this document contains provisions that apply to Lleida.net's suppliers, who may be expressly requested to comply with these provisions, in writing.

Lleida.net seeks to apply the principles of this Code to uncontrolled subsidiaries and joint ventures.

This Code of Ethics applies as long as it does not conflict with the legal frameworks of the countries where Lleida.net operates. Its provisions prevail unless the law requires more restrictive measures. Its principles and values should take precedence over local customs.

Dissemination and Compliance

Lleida.net will publish this document on its website and distribute a copy to all individuals to whom it applies by electronic means.

These individuals must sign a declaration of responsibility declaring that they have read the document and commit to complying with it.

Core Values of the Organization

Mission

Our mission is to provide companies, public administrations, and individuals with secure, trustworthy, efficient, and cost-effective electronic communication solutions. By doing so, we aim to directly contribute to improving their overall results. We are committed to innovation, continuously adapting to meet the evolving needs of our clients, ensuring sustainable profitability for our shareholders, and fostering the professional development of our employees.

Vision

Our vision is to be the leading international operator in registered electronic communications. We strive to deliver services recognised as industry standards, offering society new and improved ways of communication that improve and facilitate relationships between people, turning traditional communication processes into value services in line with new technologies.

Values

Leadership

We are committed to excellence, professionalism, efficiency, and teamwork in all that we do.

Trust

We prioritise building trust with our clients and society by providing the highest level of service, ensuring quality, and offering robust security measures.

Sustainability and Responsibility

We are dedicated to responsible growth, caring for our employees' interests, promoting personal and professional development, and fostering a healthy work-life balance.

Accessibility

We believe in providing services accessible to everyone without physical, sensory, or other barriers.

Behaviours in Alignment with the Code of Ethics

Conduct of Directors

- Integrity
- Devotion to shareholders
- Prohibition of insider trading

Conduct of Executives

- Loyalty to the Company Contributing to the collective project above the personal interests of the group.
- Avoiding misuse of power
- Fair treatment
- Abstaining from the use of privileged information

Conduct of all professionals

- Adherence to the Company's values and the principles outlined in the Code of Ethics
- Not using company resources for illegal or fraudulent purposes

Aspects Covered in the Code of Ethics

Compliance and Integrity

Addressing Compliance Policy aspects:

- Adhering to laws and regulations
- Mitigating risks
- Taking measures to identify and investigate non-compliant conduct.

Compliance with current legislation, internal policies and procedures, social responsibility, and corporate ethics are fundamental requirements for every professional within Lleida.net.

Lleida.net unequivocally rejects any behaviour that contradicts these principles and any personal gain or profit resulting from such misconduct. Therefore, it is the responsibility of all professionals at Lleida.net to safeguard the integrity and reputation of the Company.

The formulation and approval of all necessary policies and procedures are essential to ensure compliance with existing legislation, minimise risks, and prevent any actions or behaviours that deviate from the law or the provisions of this Code of Ethics.

Additionally, all professionals must transparently collaborate by providing accurate and reliable information to Lleida.net's oversight and control departments and external or internal audits and must cooperate with any public authorities or official bodies that require information or assistance.

Conflicts of Interest

Professional decisions must prioritise the best interests of Lleida.net and should not be influenced by personal relationships, family ties, or individual interests.

Employees of Lleida.net are prohibited from using their position, resources, or the Company's reputation for personal gain, promoting personal interests, or favouring family or friends. They should abstain from any decision that could conflict with their interests and those of Lleida.net.

Lleida.net acknowledges that its employees may engage in social or charitable activities, have family businesses, or pursue personal ventures outside of work if it doesn't impact on their performance, create conflicts of interest, or involve unfair competition.

Anti-Corruption and Anti-Bribery

Implementation of anti-corruption and anti-bribery policies.

- Taking action against bribery and corruption in any form. Zero tolerance approach
- Employees should not accept gifts or favours beyond ordinary courtesy.
- Gifts or favours should only be exchanged when considered reasonable and within the normal scope of professional or business relationships.
- Employees should not attempt to influence decision-making by exchanging gifts or favours.

Lleida.net conducts its business in compliance with applicable laws, adhering to ethical standards and without engaging in bribery or corruption, whether in the public or private sector. Employees are required to comply with the Anti-Bribery and Anti-Corruption Policy. They must not promise, offer, provide, or accept payments, gifts, donations, sponsorships, or any other benefits to influence or attempt to influence the decisions of third parties, public officials, or authorities to gain unjustified advantages. Likewise, employees should not solicit or accept gifts, payments, or benefits to achieve the same outcomes.

All employee payments must be properly documented, with invoices, receipts, or other supporting documents indicating the purpose of the payment. These transactions should be faithfully recorded in Lleida.net's internal records.

Any sponsorships, donations, or charitable contributions must be documented, approved, and recorded by Lleida.net. Such decisions should not be made solely by one individual.

Lleida.net does not provide direct or indirect contributions, monetary or in-kind, to political parties or individuals involved in politics. Any contributions made by employees must be on a personal basis, without using the name or image of Lleida.net.

Prevention of Money Laundering and Financing of Terrorism

Lleida.net acknowledges the importance of combating money laundering and the financing of terrorism and is committed to rejecting any practices associated with these criminal activities.

To uphold the integrity and reputation of Lleida.net, the Company will not engage in business relationships, employ individuals, or enter into agreements with any person or entity that:

- Possesses information that suggests a connection to money laundering or terrorism financing or raises suspicions of involvement in any form of criminal activity.
- It is included in international sanction lists.
- Requires administrative authorisation to operate by law but does not possess such authorisation.
- Uses or intends to use Lleida.net's products for illicit purposes or in violation of applicable laws.
- It is involved in economic activities related to producing or distributing weapons, dual-use goods, or other military products.
- Requests to conduct financial transactions through bank accounts that they do not rightfully titles to.
- Requests or receives transfers from or to countries with banking secrecy laws, weak anti-money laundering or counter-terrorism financing controls, tax havens, or high levels of corruption.
- Requests payments not specified in the contract, to third parties, to bank accounts not included in the agreement, or to countries unrelated to the performed operation or service.

Fiscal and Financial Integrity

Provision of the Fiscal and Financial Policy:

- Complying with applicable tax obligations.
- Ensuring control of income and expenses for optimal efficiency.
- Conducting transparent and ethical practices in financial markets.

Lleida.net and all its subsidiaries adhere to the current accounting, financial, and tax legislation in each country of operation. They actively promote measures to mitigate risks and prevent behaviours that could give rise to such risks.

Prudence is the guiding principle in all decision-making processes concerning potential accounting, financial, or tax risks. Additionally, all activities aimed at evading taxes unlawfully or improperly seeking, claiming, or obtaining tax benefits, such as deductions, allowances, or similar advantages, are strictly prohibited.

Opaque corporate structures are strictly prohibited, including intermediary or instrumental entities in tax havens or non-cooperative jurisdictions with tax authorities. Such structures may impede the identification of responsible parties or beneficial owners of assets or rights involved.

Consequently, the following fundamental guidelines must be observed:

- Maintain transparent, good-faith, and cooperative relationships with Tax Administrations or Authorities
- Prohibit the alteration, manipulation, modification, or omission of any relevant information or transactions within the accounting, financial, and tax domains.
- Refrain from engaging in activities that present or may present conflicts of interest, always prioritising the interests of clients, the organisation, and its shareholders.
- Prohibit the use of privileged information obtained through one's position for personal gain or on behalf of third parties.
- Regularly develop budgets and closely monitor compliance, promptly addressing any deviations.

Relations with Third Parties

Privacy policy.

- Provision of the Third-Party Policy:
- Contracting services with a focus on efficiency
- Exercising due diligence in selecting suppliers and clients

Lleida.net is dedicated to providing and maintaining the highest quality of services and customer support, consistently striving to meet client requirements and expectations. Mutual success is our goal.

We commit to ensuring appropriate quality standards in our services and regularly assessing their quality and customer satisfaction. We carefully consider client complaints or suggestions, analysing them with our professionals.

The behaviour of Lleida.net professionals towards our clients should be guided by assistance, courtesy, and respect, promoting a professional and long-term relationship while avoiding discrimination, and with the objective of always maintaining a long-term professional relationship.

We expect our clients to share our values and uphold high ethical standards. We engage in business relationships with those who respect the law and share similar principles. Hence, our professionals

must make an effort to evaluate the reputational and economic risks associated with potential business commitments before proceeding.

When selecting suppliers, we prioritise merit and competitiveness, employing objective and transparent processes while avoiding favouritism or situations that could create conflicts of interest.

Lleida.net aims to establish enduring relationships with our suppliers built on mutual respect. Suppliers must align their conduct with our values and principles when providing services or products.

The responsibilities of our suppliers concerning our Code of Ethics are as follows:

- Respect and adhere to our Code of Ethics throughout the contractual relationship.
- Understand and comply with the laws governing our business activities.
- Report any breaches of the Code of Ethics or relevant information related to compliance to Lleida.net in good faith.
- Cooperate fully with any investigations related to the Code of Ethics, providing complete and accurate information regarding the incidents under scrutiny.
- Ensuring that their suppliers have policies that respect our principles and values.

Failure to fulfil these responsibilities may harm the reputation of Lleida.net and society as a whole. Depending on the severity of the non-compliance, Lleida.net may issue a warning to the supplier or terminate the contractual relationship without prejudice to any legal actions that may be pursued.

Market Relations

Lleida.net acknowledges the importance of adhering to competition regulations, as it recognises that any violation of these rules would seriously harm its reputation and could result in legal repercussions such as penalties, damage claims, or even being barred from government contracts.

Therefore, it is expected that Lleida.net professionals avoid engaging in anti-competitive agreements or behaviours that undermine fair market practices. These may include price-fixing, market allocation, sharing strategic information, or manipulating public or private tenders in which they seek to participate. Lleida.net strictly prohibits its professionals from attending meetings that discuss topics aiming to restrict free market competition.

Bearing in mind that Lleida.net is a listed company, Lleida.net professionals must also adhere to the Internal Code of Ethics, ensuring they refrain from misusing insider information or disclosing it to unauthorised individuals.

Professionals are strictly prohibited from engaging in transactions involving securities or financial instruments based on non-public information until that information is effectively made public. They must also avoid manipulating the market, such as executing false orders or disseminating misleading or false information.

Employment Practices

Policy provisions regarding personnel:

- Preventing and addressing Psychological Harassment
- Preventing and addressing Sexual Harassment or Harassment based on sex
- Promoting work-life balance Working-from-Home and digital disconnection
- Ensuring fair compensation
- Transparency and fairness in selection and promotions
- Providing appropriate training for job roles
- Respecting freedom of association and collective bargaining
- Maintaining workplace safety and health

Lleida.net respects equality and diversity, condemning physical, sexual, psychological, or verbal harassment or abuse among its employees. It prohibits any behaviour or situation that creates a hostile, offensive, or humiliating environment.

Harassment or discrimination based on gender, age, race, nationality, religion, sexual orientation, marital status, disability, union membership, or any other grounds is strictly prohibited.

Each employee is responsible for fostering an inclusive and non-discriminatory workplace, treating others fairly and respectfully. Threats, humiliation, derogatory remarks or actions, or invasion of personal space are unacceptable.

Lleida.net employees must comply with protocols addressing psychological and sexual harassment.

Lleida.net promotes fair employment practices by hiring, promoting, training, and compensating employees based on merit and equal opportunities. Personal biases should not influence decision-making regarding recruitment, evaluation, promotion, compensation, task allocation, or training.

Lleida.net is committed to its professionals and their talent, giving special importance to their training, personal and professional development through periodic evaluations of the professionals and identifying necessary training facilitating such training.

Workplace safety and health are prioritised, adhering to relevant legislation. Employees are informed, trained, and expected to actively participate in maintaining a clean, safe environment for themselves and their colleagues.

Employees have the right to join associations and are not subject to discrimination based on their affiliations. Collective bargaining rights are recognised, enabling worker representatives to fulfil their duties freely. Employee representatives shall be free to carry out their functions within the workplace.

To ensure adequate rest, personal privacy, and work-life balance, Lleida.net has implemented protocols for Working-from-Home and digital disconnection.

Training and Communication

Policy provisions regarding training and communication:

- Confidential information shall be respected.
- Respectful and loyal behaviour is expected on social media platforms.

The image and reputation of Lleida.net are crucial for maintaining trust among our clients and society as a whole. Therefore, all communications must be truthful, transparent, and respectful towards our competitors, avoiding misleading advertising or practices.

The responsibility for media and social media contact lies with the Business Development department, which is authorised to disseminate information about Lleida.net.

When expressing opinions, making contributions, or engaging in collaborations on social media, blogs, forums, or other media platforms, our professionals must do so in their capacity. They are prohibited from using the image or name of Lleida.net or any of its brands and sharing confidential or non-public information of Lleida.net or third parties. Furthermore, professionals at Lleida.net are strictly prohibited from using their corporate email accounts for personal website subscriptions or creating user profiles.

Information Security

Provisions of the security policy:

- Compliance with high information security standards and relevant accreditations (ISO 27001).
- Protection of tangible and intangible assets of Lleida.net.
- Maintenance of a security management system and commitment to continuous improvement.
- Control of access to information.
- Confidentiality is a fundamental principle.
- Respect for intellectual and industrial property.

Lleida.net is committed to providing its professionals with the necessary resources and means to do their work. Professionals must use Lleida.net's assets, properties, and facilities with respect and diligence, strictly for their assigned purposes, and to protect them against misuse, abuse, fraud, or any actions that could pose economic or reputational risks to Lleida.net. Confidentiality of information is a cornerstone of our business, and maintaining the trust of our clients is crucial. Therefore, the management of data, documents, or information management must be carried out properly.

Professionals at Lleida.net must maintain professional secrecy regarding client data, documents, and information they become privy to due to their professional activities. This obligation extends beyond terminating their contractual or employment relationship with Lleida.net. Information should only be used for professional purposes and must not be exploited for personal gain or to benefit family or friends.

Lleida.net will employ the necessary security measures and tools to safeguard our information and that of third parties against internal or external risks, unauthorised access, manipulation, or destruction. Professionals must adhere to the Information Security Policy and any accompanying instructions.

Information will be classified accordingly, and appropriate security measures will be implemented for each classification level. Our professionals must exercise discretion and caution to prevent the disclosure or unauthorised release of confidential information during conversations and when writing, printing, or sharing information. Furthermore, professionals should exercise caution when handling suspicious emails or links and must not share access passwords for systems or access cards for facilities.

Respecting intellectual and industrial property is paramount for Lleida.net, and we will protect both our rights and those of third parties. This encompasses rights related to copyrighted software and content, design rights, registered trademarks, patents, and source code licenses.

Professionals at Lleida.net must comply with the 2015 Regulatory Legal Compliance Regulations, refraining from using information or documentation belonging to third parties without their consent. Such information may only be used within the scope of their professional activities and must be returned with any supporting materials when requested.

To ensure clarity regarding the responsibilities and obligations related to information security, Lleida.net will create a Handbook for its professionals. This Handbook will provide clear guidelines and instructions and will be provided to professionals upon their recruitment. Additionally, relevant training sessions will be organised, requiring active participation from professionals.

Protection of Personal Data and Privacy

Provisions of the policies for the protection of personal data and privacy:

- Personal data shall always be used for specific, explicit, and legitimate purposes in compliance with the letter and spirit of the General Data Protection Regulation (GDPR) and other data protection regulations.
- To ensure compliance with data protection legislation, each employee shall sign the Company's Handbook, expressly committing to observe all legal provisions contained in the GDPR and other regulations governing data protection, as well as Lleida.net's privacy and security policies, to protect the privacy and

personal data processed in the performance of their duties while maintaining strict confidentiality.

- Lleida.net guarantees the necessary and appropriate training of employees in data protection and privacy, which shall be provided upon their integration into the Company and at least once a year throughout their employment.
- Lleida.net ensures that its suppliers consistently comply with the provisions of the GDPR and other regulations governing data protection. Suppliers shall process personal data solely for the purposes outlined in the service provision contract, strictly following Lleida.net's instructions and never for their own purposes. Suppliers must also adhere to Lleida.net's specified security measures as stipulated in their service contracts and maintain strict confidentiality regarding any personal data accessed while providing services.
- Lleida.net commits to promptly and effectively responding to data subjects exercising their fundamental privacy rights in compliance with the GDPR and other data protection regulations.

Trust service

Provisions for the development of trust services and associated policies:

- Deliver trust services in full compliance with the legal and regulatory frameworks of the territories where they are provided.
- Offer secure and innovative services.
- Objectively and truthfully transmit the necessary information about the services to clients, suppliers, and trusted parties, promptly informing them of any relevant changes.
- Collaborate with regulatory and supervisory authorities to enhance regulatory frameworks and the implementation of services.
- Manage the services while upholding standards that ensure their sustainability and longevity, including potential service termination scenarios.
- Ensure accountability, diligence, and responsibility in providing services to users, trusted parties, and supervisory bodies.

Sustainability and Corporate Social Responsibility

CSR policy provisions

- Ensuring the protection and respect of human rights
- Showing due regard for the environment
- Fostering economic collaboration with social causes at both the Company and individual levels are key tenets of Lleida.net's CSR policy.
- Participating in and organising activities related to social causes at a corporate level and extending invitations to individuals to participate.

For Lleida.net, it is of utmost importance that all economic benefits derived are rooted in principles such as respect for human rights, equal opportunities, and environmental sustainability. To uphold these principles, the Company meticulously designs, develops, and offers services that align with these values. Furthermore, Lleida.net expects its professionals to use resources efficiently, minimise waste generation, and use selective waste collection containers.

Furthermore, Lleida.net endeavours to utilise hybrid or electric vehicles whenever feasible and encourages the use of public transportation for professional travel. The Company prioritises sourcing renewable energy for its offices and implements measures to enhance energy and water efficiency while promoting conservation.

When appropriate, Lleida.net offers remote work opportunities to its professionals to foster flexibility, optimise work-life balance, and contribute to reducing pollution.

Additionally, the Company actively collaborates with social organisations and engages in local volunteering programs while providing incentives for its professionals to participate in these initiatives actively.

Lleida.net expects its professionals to play an active role in promoting the social and environmental sustainability of the Company, thereby generating value, and fostering responsibility for society and the organisation itself.

United Nations Commitment

As part of its commitment to social responsibility and sustainability, Lleida.net actively supports the United Nations Global Compact, incorporating the Ten Principles of the United Nations into its business strategies.

Principle 1: Lleida.net supports and respects the protection of internationally proclaimed human rights; and

Principle 2: ensures they are not complicit in human rights abuses.

Labour

Principle 3: Lleida.net upholds the freedom of association and the effective recognition of the right to collective bargaining.

Principle 4: Eradication of all types of forced and compulsory labour;

Principle 5: Effective elimination of child labour; and

Principle 6 : the elimination of discrimination in respect of employment and occupation.

Environment

Principle 7: Lleida.net supports a precautionary approach to environmental challenges.

Principle 8: undertakes initiatives to promote greater environmental responsibility; and

Principle 9: Promote the development and dissemination of environmentally friendly technologies.

Anti-corruption

Principle 10: Anti-corruption

Lleida.net is committed to combating corruption of all types, including extortion and bribery.

Information and resources

Information on policies and procedures

Accessed by employees through Lleida.net's Corporate Cloud platform.

Whistleblowing channel

For the whistleblowing channel, employees can report any concerns or wrongdoing through the dedicated

Whistleblowing Channel at Lleida.net website (www.lleida.net).

Follow-up and interpretation

Employees can contact the Compliance Department to seek clarification or address any doubts regarding policies and procedures.

The Compliance Department is responsible for reviewing and updating the document regularly, and any modifications to the policies and procedures require approval from the Board of Directors.

Employees are encouraged to contact the Compliance Department via email at compliance@lleida.net for inquiries or concerns about the policies and their applications.

How to deal with non-compliance

What will occur if the Code of Ethics is breached.

Non-compliance with the Code of Ethics or any associated Policies will initiate an internal investigation and may result in disciplinary measures outlined by labour laws, relevant collective bargaining agreements, and the internal procedure 3022 - Procedure for disciplinary proceedings.

These investigations will be conducted in a fair, unbiased, and confidential manner. Any form of retaliation against individuals who, in good faith, report misconduct or cooperate with an investigation is strictly prohibited.

If an individual is found to have made a false or malicious report or engaged in retaliatory actions against someone who reported or raised a concern in good faith, they will be subject to disciplinary action.