

Code of Conduct of the Society of Jesus in Spain



“TO BETTER PROCEED...”
(Saint Ignatius of Loyola, Constitutions SJ [134])

**Approved by the Provincial of Spain
of the Society of Jesus**

January 30, 2013

Updated and revised

December 12, 2018

A stylized, handwritten-style signature or logo in grey, located in the bottom right corner of the page. It consists of a large, flowing 'J' followed by a horizontal line that extends to the right.

Institutional Objectives of the Society of Jesus and aids to achieve them..... 1

I. Nature and Scope of the Code..... 4

II. Values and Behavior to be followed

A) Behavior of the Institution 6

a) Regarding itself..... 6

b) Regarding the Church..... 6

c) Regarding society in general..... 6

d) Regarding its recipients and beneficiaries..... 7

e) Regarding its employees and collaborators 7

f) Those responsible and collaborators
with these obligations..... 10

B) Employees and collaborators with the Institution 10

C) Employees and collaborators with the beneficiaries or
recipients of institutional activities, and society
in general 14

D) Personal relationships
within the Institution 17

III. Measures for Compliance with the Code 18

**Annex. Procedures for revealing and resolving possible
infractions of the Code of Conduct..... 22**



Institutional Objectives of the Society of Jesus and aids to achieve them

- 1.** The institutional objective pursued by the Society of Jesus (Society) in all of its activities and institutions, is the promotion of common good of all of those with whom it comes into contact by these means¹. This objective is also formulated as "service of God and helping others"².
- 2.** This intention of "helping others" extends to all kinds of people³, without distinction, and consists of cooperating with them, according to their diverse circumstances as human beings and their degree of maturity, while respecting their own sense of responsibility and decision-making capacity, in fomenting the full development of their possibilities as people, and active, responsible and supportive members of society.
- 3.** The Society of Jesus takes on and promotes its institutional objectives as participation in the salvific and humanizing mission of the Catholic Church, as transmitted from Jesus Christ, for the good of all Humankind, and in subordination to it⁴.
- 4.** The Society of Jesus, in turn, understands that promoting its institutional objectives constitutes its specific social responsibility, as an active and voluntary contribution to the improvement of society in diverse fields, mainly social, cultural and religious.

¹ Cf. Saint Ignatius, , *First and General Examination* (Ex.), [3].

² Or "service of God to help others", or also "service of God by helping others".

³ Cf. *Constituciones* [163].

⁴ Cf. *Formula of the Institute* (FI), 1; NC 245 §1. The institutional objective has recently been formulated, under the denomination of *Mission of the Society*, as "the service of Faith, of which the promotion of justice is an absolute requirement", together with "the inculturated proclamation of the Gospel and dialogue with other religious traditions, as integral dimensions of Evangelization" (NC 4 §1, 245 §3).

5. In the various activities and institutions aimed at "helping others", the Society of Jesus employs, under its direction and ultimate responsibility, its own members and other persons incorporated in various ways, either through relationships of employment or voluntaries.
6. In order to achieve its objectives, the Society of Jesus uses different means and aids, according to the nature of its respective activities and institutions; standing out, among these, in general, for all types of activities, as first, generally speaking, "the good example of honesty and virtue" of those who collaborate in them, so that they may contribute more with good works and deeds than simply by good words ("edification") of those with whom they deal⁵.
7. More specifically, since its origins, the Society of Jesus has had General Rules or Instructions, or rules and instructions for particular works and activities, which, in addition to describing the way to perform them adequately in order to achieve the intended objectives, reference is also made to the way to relate to the people who should benefit from them⁶.
8. Recently, *Institutional Declarations*, ethos of the schools, *Characteristics* and other similar documents have been drafted for the same purpose, describing the objectives pursued in the various institutions and activities, the basic principles by which they are to be governed, the values that they promote and attempt to communicate, and the basic means used to achieve the objectives. These documents also express the expectations of the Society of Jesus regarding the collaboration of the people who work in the institutions which it administers, beyond what is purely legal or contractual.

⁵ Cf. Cons [637].

⁶ The "Instructions" given by Saint Ignatius himself or given through others, have special meaning in this context, or by his mandate to Jesuits sent to certain missions, thus fulfilling the general provision, referred to in the *Constitutions* [612-614, 620-630].

9. Continuing with this practice of the Society of Jesus, the provisions that follow seek to formulate, for the present time, a *Code of Conduct*⁷ (Código) (Code), which all institutions and activities under the responsibilities of the Society in Spain must abide by in the performance of their functions, whether they be their own, or functions entrusted to them, including the people who collaborate with them.

10. In doing so, the applicable legal and contractual obligations are taken into account, together with the content of the basic documents mentioned (Institutional Statements, ethos of the schools, Characteristics and similar), which are at the foundation of the Code, as they represent an expression of the intentions of the Society of Jesus in its diverse activities.

⁷ “Code of Conduct” is an express statement of the policy, values and principles on which the behavior of a company or institution is inspired with regard to the development of its human resources, and its interaction with its employees and collaborators, customers or recipients and beneficiaries of its activities, the governments and communities where activities are carried out, and its environmental management. It also contains bodies and procedures to supervise its own observance and compliance, and to correct and sanction possible infractions (ILO).

Nature and Scope of the Code

- 11.** This Code of Conduct does not create in itself new obligations that do not exist independently of it, either by institutional commitment, by law or by voluntary agreement; but rather, in moving forward and based on them, it specifies and lays out specific ways of proceeding which are appropriate in their fulfillment, and, thus, favor the achievement of the institutional objectives pursued, while at the same time, providing guarantees for this to those directly interested, and to society in general.
- 12.** The Code will be applied to all of the institutions and Apostolic activities of the Society of Jesus in Spain, of its own ownership or those entrusted to it statutorily, or by virtue of particular or private agreements, and will bind all of its directors, employees and collaborators, as well as the members of the Society of Jesus who work therein. It will also be applied to religious communities and organizations that have employees that meet their needs.
- 13.** For the purposes of this Code of Conduct, all of those members of the Society of Jesus and other people who carry out activities that imply managerial power will be considered directors.
- 14.** Employees are considered to be persons linked to an institution of the Society of Jesus through a contractual relationship of employment.
- 15.** Collaborators are considered to be persons who, without having a work or institutional relationship with the Society of Jesus, participate, voluntarily and free of charge in the organization, or by fomenting its activities or institutions.
- 16.** The application of this Code of Conduct may also be extended to any other person or entity related to the institutions and religious communities of the Society of Jesus (external advisors, service providers or suppliers) whenever it is deemed necessary by the Compliance Committee, due to the nature of their activities.

Values and Behavior to be followed

17. In general:

1. The activities and institutions administered by the Society of Jesus in Spain and those who work in it, to the greatest possible extent, must proceed in a positive manner consistent with the institutional objectives pursued by the Society, seeking in all aspects the integral good of the people that they serve, and avoiding anything that may prove to be an obstacle in achieving this.
2. Consequently, all of those who work and collaborate with the institutions and religious communities of the Society of Jesus are encouraged to share the following values, as supporters and ethical informants of this Code of Conduct:
 - i. Support and respect for internationally recognized Human Rights.
 - ii. Respect for workmates and colleagues, for all people and for oneself, and sensitivity to the specific personal situation of others.
 - iii. Cooperation for the common good of society without political interference.
 - iv. The search for justice and peace.
 - v. Social responsibility and vocation of service to others.
 - vi. A sense of effective solidarity, especially with those most in need.
 - vii. Non-discrimination and equal opportunities.
 - viii. A commitment to legality and the rule of law.
 - ix. Professionalism and aspiration to excellence and quality in services and forms of management.
 - x. The promotion of family life.
 - xi. Dialogue and participation.
 - xii. Value diversity in a positive light and learn from differences between people, ideas and situations.
 - xiii. Respect for the environment.
 - xiv. Responsible freedom.
 - xv. Trust.
 - xvi. Loyalty.

- xvii. Integrity.
- xviii. Transparency.
- xix. Truthfulness.
- xx. Honesty.

18. In particular, the behaviors described below will be observed.

A) Behavior of the Institution

a) Regarding itself

- 19.** It must, as a first obligation, carry out its mission, preserve, maintain and strengthen its own identity, and clearly manifest this to its recipients and beneficiaries, and to those who work in it, and make this visible to the general public by all appropriate means for this objective.
- 20.** In practice, this implies the periodic formulation and permanent implementation of effective strategic actions, aimed at these objectives; but, above all, that in its way of functioning and behaving internally and externally, the institution is itself a living embodiment of the Mission that it intends to carry out and of the principles and values which it attempts to transmit, thus manifesting itself publicly as such.
- 21.** The institution will be submitted to regular self-evaluation, which is honest and objective concerning these aspects, so vital to it and to the service which it is called to provide.

b) Regarding the Church

- 22.** It will carry out its activities in communion with the Church, and will cooperate with its plans and initiatives in the community environment in which it resides, maintaining, at the same, solidarity with the initiatives of a universal nature; and will do everything possible to foment cordial relations with the authorities and organisms of local churches and with other similar institutions in the same field.

c) Regarding society in general

- 23.** It will carry out its activities without political interference of any kind. Any relationship with governments,

authorities, institutions and public bodies will be carried out in a lawful, ethical and respectful manner.

24. At the same time, it must be aware of the general duty to cooperate, according to its own nature and possibilities, for the common good of the community in which it is functioning.

25. In particular:

1. It will faithfully comply, and within its scope, it will enforce all legally corresponding obligations.
2. It will undertake to act in a manner that is respectful with the environment in which it is operating, observing the generally accepted procedures and practices on the matter and expressly promoted by the Society of Jesus. To achieve this, it will appropriately offer guidance to those who work in it and to its beneficiaries on perspectives, resources and shared practices of an ecological nature, and will request specific behaviors of them which are consistent with these practices.

d) Regarding its recipients and beneficiaries

26. The recipients and beneficiaries of the activities of the institutions of the Society of Jesus must be considered as the center point at which their efforts, and those of all who work toward them, converge. The Society of Jesus will strive to offer all people a high level of excellence and quality in all of its services and forms of management.

27. This desire for excellence must be explicitly orientated towards selfless service to others, especially those most in need.

28. The institution will work to raise awareness in its recipients and beneficiaries with regard to the needs of others, and to instill in them a committed sense of effective solidarity.

e) Regarding its employees and collaborators

29. Dignified and respectful treatment of people

1. Respect and dignified treatment of people, as well as the rejection of any vexatious or discriminatory attitude, constitute a basic and inalienable principle of action.
2. No one will be discriminated against, disadvantaged or benefited at the workplace because of their ideology,



religion or beliefs, their belonging to an ethnic group, race or nation, their sex, sexual orientation, illness or physical or mental disability, for holding the legal or union representation of workers, or for the use of any language that is official within each Autonomous Region of Spain, according to the current legislation established, taking into account the circumstances of each case.

30. Guarantee of safety and health at work

1. Working conditions will be established that guarantee safety and protect the health of both those who work there, as well as their recipients or beneficiaries.
2. For these purposes, the regulations on health and safety at work and environmental protection will be applied, regular instruction and training will be provided in this area, and regular surveillance and maintenance of the facilities, goods and equipment will be carried out.

31. Respect for working conditions and Social Security Health Insurance

1. The working conditions and Social Security Health Insurance established by legal provisions, collective agreements and signed contracts, as well as the rights that are recognized for employees therein, will be respected at all times.
2. Hiring and internal promotion policies will be based on criteria of merit, ability and professional worth, as well as on the personal identification and harmony of employees with the institutional statement or ideology of each institution.
3. In addition to equal opportunities, the promotion of the integral development of employees and collaborators is guaranteed, both in the professional and personal realm, offering them the training and tools necessary for the performance of activities.
4. As an aid to its employees and collaborators, and in order to improve their performance of their tasks and duties, the institutions will provide them with the basic documents that define their mission and will help them to become familiarized with these documents, and assimilate their contents, through periodical information

and periods of reflection, so that their their behavior is inspired in and by them.

32. Guarantee of freedom of association and collective negotiation

Employees are guaranteed, without exception, the rights of association, unionization and collective bargaining.

33. Promotion of personal and family life

1. Family life of employees and collaborators will be promoted. As far as possible, the necessary measures will be taken to provide adequate assistance (timetables, holidays, reductions in working hours or any other measures of similar effect) to those who are responsible for the upbringing of minors, or care-taking of relatives with disabilities or serious illnesses.
2. In order to ensure rest and vacation time, and to respect the personal and family life of employees and collaborators, telephone communications and digital messages related to work outside of working hours will be avoided, taking into account the nature and object of the employment relationship, and subject, in any case, to the provisions of collective bargaining or, failing that, to that which is agreed upon with employee representatives. Cases of *force majeure* or exceptional circumstances are exempt.

34. Participation in other activities and associations

1. The right of employees and collaborators to participate in any non-professional activity will be respected, provided that it does not interfere with the exercise of their functions or that the public image of the institution is not compromised.
2. The right of employees and collaborators to participate in associations or political parties or other economic, social or cultural institutions is also recognized, provided that this does not interfere with the proper performance of their activities at the institution.

f) Those responsible for compliance with these obligations

- 35.** These are the individuals responsible for the fulfillment of the obligations of the institution itself; first of all, those who hold management positions, and additionally, those responsible for the corresponding area: all of those people who work or collaborate within.

B) Employees and Collaborators with the Institution

36. Those committed to the institution

Those who work and collaborate at an institution of the Society of Jesus, aware of the importance of the Apostolic mission and of the social function that they fulfill, must feel committed to it. For this reason, they will always maintain a behavior in accordance with the values and ideals that the institution promotes, expressed in its ideology or institutional statement, respecting these principles and the means to carry them out.

37. Safeguarding the integrity of the institution

1. All those who, in any way, work or collaborate at the institution, must show in their actions a morally upright and consistently faultless behavior with superiors, colleagues, subordinates and with the recipients and beneficiaries of their mission, and thus avoid any conduct that may harm the reputation of the institution.
2. They must also continually strive for self-improvement in their character and their activities, in order to promote excellence in all areas of the Mission, and provide the best service to the institution, to their colleagues and to its beneficiaries and recipients.

38. Private life and conflict of interest

1. The institution respects the private life of its personnel, and consequently, the private realm of their decisions, without prejudice to a desired coherence of lifestyle with the ideology and particular nature of the institution,

particularly when pertaining to those who occupy positions of responsibility.

2. Employees may not carry out professional activities outside the institution that may be in direct competition with its activities, unless they have special authorization.

39. Public activities

Those people who work or collaborate at the institutions and in activities of the Society of Jesus, when representing the institution at events, for lectures, seminars or at any other activity that may have public repercussions, in particular pertaining to the media, must be especially careful in their comments and declarations, so that the character of the institution that they represent is not undermined.

40. Confidential information and discovery and disclosure of secrets

1. All of those who work or collaborate at an institution of the Society of Jesus shall refrain from using, or from communicating in any way, data, documents or information of a strategic or confidential nature, for their own benefit, obtained during the exercise of their activities at the institution.
2. The nature of confidentiality will remain in place once an activity at the institution has concluded, and it will include the obligation to return any materials related to this that the employee or collaborator has in their possession at the time of cessation of work.
3. It is not permitted to disclose secrets or violate the privacy of another person, seize, without their consent, their papers, letters, messages, emails or any other documents or personal effects, or intercept their telecommunications or use technical listening devices, transmission, recording or reproduction of sound or image, or any other forms of communication.



41. Access to documentation, data and computer systems

1. Those who work at and collaborate with the institution do not have the right to access information outside of their functions, except in their capacity as superior or person authorized to do so. No employee may make copies of documents from the institution or computer files, unless they are required for reasons which are related to work.
2. All data and computer files must be kept in such a way that any employee can substitute or replace another employee at all times. Therefore, files should be complete, orderly and easy to understand.
3. It is not allowed, by any means or procedure, and in violation of the security measures established to prevent this, access without authorization to data or computer programs contained in a system, or in any part of it, or to gain access to it against the will of whomever has the legitimate right to exclude intervention.
4. Documents and data storage media used at the workplace may not be made accessible to unauthorized persons, and will therefore be kept under lock and key. Computers should be protected by using passwords that should be changed frequently.

42. Protection of personal data

1. Personal data deserves special protection, and for this purpose the legislation on the matter will be scrupulously complied with by all.
2. In no way is it allowed to seize, use or modify, without authorization, to the detriment of a third party, reserved personal or family data of another that are recorded on a computer, electronic or telematic files or media, or in any other type of file or registry; nor is it permitted to access them by any means or alter or use them to the detriment of the owner of the data or a third party.

43. Property administration

1. Directors and managers at the different institutions must administer temporary goods with great diligence and loyalty, not as owners who may dispose of their own assets at their discretion, but as agents who must administer, in accordance with the laws of the Church

and the Society of Jesus, the assets that have been entrusted to them.

2. Likewise, all directors and managers at the institutions must carefully monitor, so that, in the administration of the assets of the institution, and, especially, in capital investments, they safeguard the ethical quality of the same, and that they do not undermine social justice or evidence a lack of care in promoting this cause.
3. The administrators of the institutions will faithfully comply with accounting obligations. They are not allowed to keep different accounts that, referring to the same activity and financial year, hide or simulate the true situation of the institution; nor cease to record business, activities, operations or, in general, economic transactions in mandatory books; nor write them down with figures other than the true ones; nor practice fictitious annotations in compulsory books and manuals.
4. All accounting records must be made available to internal and external auditors.

44. Money laundering

1. It is not allowed to acquire, possess, use, convert or transmit goods knowing that they have their origin in a criminal activity, nor perform any other act to hide or conceal their illicit origin, or to help a person who has participated in an infraction or infractions to avoid the legal consequences of their actions.
2. Likewise, the concealment or cover-up of the true nature, origin, location, destination, movement or rights over goods or property, thereof, is not allowed, knowing that they come from illegal activities or from an act of participation in them.

45. Use of facilities, equipment and services

1. The assets of the institutions of the Society of Jesus are intended to fulfill the purposes of the same. Consequently, no person may expropriate them, while the facilities, equipment and services of the institution will



be used exclusively for the functions assigned to them. No employee or collaborator may make use of them for personal purposes, without the express authorization of the corresponding superior.

2. The following activities are prohibited with regard to computer equipment: the generation or transmission of viruses, the illegal copying of software, the downloading of content subject to copyright and the distribution of emails for political or commercial purposes.
3. Computer equipment employed for personal use will be allowed in moderation, subject to the control of the institution, in accordance with the criteria previously established and made known to employees and collaborators.
4. At the time of termination of their relationship with the institution, all those who have worked or collaborated there have the obligation to return any equipment or materials related to the institution which they may have in their possession; they also have the commitment not to use institutional electronic mail or digital signatures, unless specially authorized to do so.

C) Employees and collaborators with the beneficiaries or recipients of institutional activities and society in general

46. Relations of cordiality and respect

1. The people affected by this Code of Conduct are obliged to act, in their relations with the beneficiaries or recipients of the activities of the institution, in accordance with criteria of respect, cordiality, dignity and justice, not allowing any form of violence, intimidation, hostility, humiliation, harassment or abuse, whether it be of a sexual or merely personal nature, nor discrimination based on ideology, religion or belief, ethnicity, race or nation, sex, sexual orientation, illness or physical or mental disability.
2. The development and dignity of minors deserves special respect, and they must be preserved from any conduct that may imply violence against them. intimidation,

hostility, humiliation, harassment or abuse, whether it be of a sexual or academic-related nature (such as *bullying*).

3. Likewise, personnel will avoid at all times contacting minors through the Internet, telephone or by means of any other information and communication technologies to propose or arrange encounters with them for sexual purposes (such as in the case of *on-line grooming*).

47. Complete, truthful and transparent behavior

1. All those who work or collaborate in activities and at institutions of the Society of Jesus will interact with their beneficiaries or recipients and, in general, with any natural person or persons of a legal nature with whom they deal, in a complete and transparent way, always providing true, clear and proven information, avoiding all deceptive, fraudulent and false conduct that could harm others.
2. Personnel and collaborators will also avoid any conduct that implies altering or simulating documents or contracts, steering clear of involvement in situations in place of other colleagues, and avoid attributing statements or comments different from those have been made to those who have participated in an event, as well as not telling the truth in the narration of the facts.
3. They will also respect the obligations derived from the intellectual property of others.
4. All individuals responsible for collecting information on the institution and transmitting it to Ecclesiastical authorities and public bodies, or for placing it in public announcements and statements, must communicate the information in a timely manner, in its entirety, in a truthful, open, precise and understandable fashion.

48. Relations with suppliers of goods and services

1. All those who work and collaborate at institutions and in activities of the Society of Jesus will interact with the suppliers of goods and services in a lawful, ethical and righteous manner.
2. The selection of suppliers of goods and services will be governed by criteria of objectivity and transparency, reconciling the interest of the institution to obtain the best conditions of supply, preserving an ideal situation of maintaining stable relationships with ethical and responsible suppliers. Under no circumstances should a



personal relationship or personal interests influence the awarding of a contract.

3. No individual who works and collaborates at these institutions and in the aforementioned activities may, by themselves or through an intermediary, promise, offer, grant, request or accept, directly or indirectly, gifts, favors, benefits, advantages or compensation, in cash or in form of payment, whatever their nature, that may influence the decision-making process related to the performance of the functions corresponding to their position. Commonly-recognized token gifts that have minimal monetary or intrinsic value, or which are considered advertising or promotional material, are exempted from this prohibition.
4. If an offer of this type is made to a manager, employee or collaborator, he or she must immediately notify his or her superior.
5. Any gift received in violation of this Code of Conduct must be immediately returned, and the circumstances should be brought to the attention of the superior or direct manager. If its return is not reasonably possible, the gift will be delivered to the superior or person in charge of the institution, who will use it for purposes of social benefit.

49. Relations with authorities and public bodies

In relations with Public Administrations, no one who works or collaborates at institutions or in activities of the Society of Jesus may unduly influence an authority, public official or person who participates in the exercise of public function to obtain favorable decisions from them regarding the institution.

D) Personal relationships within the Institution

50. Performance of work in an environment of trust and freedom

1. All employees and collaborators will contribute to creating a rewarding and stimulating work environment at the institution, in which individual merit is recognized

and respect is promoted, as well as the mutual exchange of ideas, equality, companionship and ideally, friendship.

2. Therefore, any form of violence, intimidation, hostility or humiliation and harassment or abuse, both of a work-related or sexual nature, will not be tolerated, with special attention being paid to the integration of individuals with disabilities into the workplace.

51. Respectful and dignified behavior

1. Verbal offenses, as well as vulgar or disrespectful words, gestures or manners to others must be eliminated from behavior.
2. Respect for others requires that employees must go to work properly dressed, in accordance with the rules of each institution.
3. It is prohibited to enter with, sell, display, offer, facilitate or possess pornographic material in the workplace.

52. Behaviors discouraging the abuse of alcohol and drugs

1. Respect for others and good performance at work are incompatible with the abuse of alcohol and the use of toxic drugs, narcotics or psychotropic substances.
2. No act of cultivation, processing or trafficking of these illegal substances, or their possession, in the workplace is permitted.





Measures for compliance with the Code

53. Dissemination and communication

This Code of Conduct will be sent to all of those who work and collaborate at institutions and in activities of the Society of Jesus in Spain. It will remain in published form on the websites of the Society and its various institutions, and will be the subject of timely communication, training and actions to foment awareness in order to encourage its appropriate understanding and implementation.

54. Commitment

The people to whom this Code of Conduct applies will sign an acknowledgment that they have received a copy of it, stating that they understand its contents and applicability.

55. Compliance

1. Compliance with the provisions of this Code of Conduct is an essential part of the contractual obligations of the employees of the different institutions and communities of the Society of Jesus, so that, without prejudice to any other liability that may arise, the breach of the Rules and Guidelines for Action contained therein may be cause for the adoption of disciplinary sanctions applicable in accordance with the provisions of the current legislation on labor-related themes now in force.
2. No one may request that any person to whom this Code of Conduct applies knowingly break any of the provisions contained therein.

56. Compliance Committee

1. In order to guarantee compliance with the Code of Conduct, there will be, as a body dependent on the Provincial of Spain, a Compliance Committee composed of three members, appointed by the body for a specified period of time. The Executive Secretary, who will be in charge of its ordinary management, will also be a part of the Committee.

2. The functions of the Compliance Committee are:
 - i. Study and respond to inquiries, complaints and any form of communication received.
 - ii. Process the appropriate complaints and, where appropriate, propose to the director of the institution or the superior of the religious community, or to whom they have delegated, the adoption of the appropriate corrective measures.
 - iii. Order audits and evaluations in compliance with the Code of Conduct, as well as prepare an annual report that will be presented to the Provincial.
 - iv. Promote appropriate actions for communication, training and awareness for the timely understanding and implementation of the Code of Conduct in all of the institutions and religious communities of the Society of Jesus in Spain.
 - v. Propose, to the Provincial, the modifications in the Code of Conduct that allow the permanent adaptation of it regarding new commitments and circumstances.
3. This Committee may act on its own initiative and at the request, or by means of communication, of any person who works at an institution or in a religious community of the Society of Jesus, or who is related to it.
4. For these purposes, all communications may be sent to the Committee, in addition to the means indicated in Article 60, through any of the following means:

Email: comitecumplimiento@jesuitas.es

Postal address: Compliance Committee. Society of Jesus.. Avenida de la Moncloa, 6, 28003 Madrid (Spain).

57. Communication of infractions

1. As a contribution to the good of the institution and those who are related to it, the people to whom this Code applies must inform their director or, where appropriate, the superior of the religious community, or, if they prefer, the Compliance Committee, of the actions in violation of its provisions, of which they have knowledge; in particular, of those that could represent a transgression of laws or general regulations that must be complied with or cause harm to others.
2. People who are considered affected by actions contrary to the provisions of this Code may communicate the facts



that they consider harmful to the director of the institution or to the superior of the appropriate religious community. They may also do so to the Compliance Committee, provided that the events are sufficiently important and are of general interest. Complaints of a lesser nature from employees concerning their employment status will be processed through the department or person in charge of Human Resources at the institution.

3. The communication of possible infractions of this Code of Conduct is protected with the corresponding obligation of confidentiality and secrecy as applied to the people who have knowledge of said communications.
4. Access to the data contained in the complaints system will be limited exclusively to the Compliance Committee. However, other people may have access to them, or may even communicate with third parties, whenever necessary, for the adoption of disciplinary measures or for the processing of legal procedures that, where appropriate, are applicable.

Without prejudice to notifications given to the competent authorities concerning acts which constitute a criminal or administrative offense, and only when the adoption of disciplinary measures may proceed, will such access be allowed to personnel with functions of management and control of Human Resources. In any case, and always with due confidentiality, the Compliance Committee may seek, at any time during the procedure, the advice and collaboration of other departments or centers in order to determine the consequences and procedure to act with regard to any complaints.

5. The confidentiality of the data related to the persons affected by the information supplied will be guaranteed, especially that of the person or persons who have made the facts known to the institution, whose innocence will also be guaranteed and identity protected. In no case will retaliation be taken against an individual when the information provided has been sent in good faith.
6. The data of the person communicating an offense, as well as the employees and affected third parties, must be kept in the complaints system only for the time

considered essential to decide on the appropriateness of initiating the investigation into the reported events. In any case, after three months from the introduction of the data into the system, it will be deleted from the complaints system, unless they are kept on file in order to provide evidence of the use of the Code of Conduct. If, while keeping this data on the computer system, it is necessary to continue the investigation, the data may continue to be processed by the investigating body of the institution responsible for said investigation, not being kept in the internal reporting information system itself.

58. Supervision

In any case, the directors and managers of the different institutions and activities of the Society of Jesus must also take the initiative to regularly supervise the activities of their subordinates.

59. Review

The Code of Conduct will be revised when necessary to adapt it to future legislative changes and to the new circumstances and commitments that the Society of Jesus may face.



Annex

Procedures for revealing and resolving possible infractions of the Code of Conduct

1. Initiation phase

- 60.** Communication or complaints of possible violations of this Code by employees, collaborators and persons related to the institutions of the Society of Jesus must be made personally and verbally or in writing to the director of the institution or, wherever appropriate, to the superior of the religious community, or directly in writing to the Compliance Committee through the channels indicated in Article 56.4. In the event that the complaint is made personally and verbally, the superior or director, unless he or she considers that the problem leading to the complaint can be solved within the institution or community itself, will be responsible for collecting it in writing, signed by the person filing the complaint.
1. Once the complaint is received directly, the director of the institution or the superior of the religious community will proceed to adopt the precautionary measures that he or she deems appropriate, reporting them to the Committee, to which everything gathered up to that point will be forwarded in the shortest possible time.
 2. In the event that it is the director of the institution or the superior of the religious community who has violated the Code of Conduct, the complaint must be addressed in writing to the corresponding Delegate of the Provincial or to the Provincial himself, respectively, as well as directly to the Compliance Committee. Once the communication has been received, the Provincial or the Delegate, where appropriate, will proceed to adopt the precautionary measures deemed appropriate, reporting them to the Committee, to which everything that has been compiled will be sent as soon as possible.
 3. If the complaint is directed against any member of the Compliance Committee, said individual will not be able to participate in its processing.
 4. The document of complaint must contain, at least, the following points:

- The identification of the person responsible for presenting it.
- A detailed description of the events reported (circumstances, dates, area of activity affected, people involved, people who witnessed or have knowledge of the events...).
- The identification of the person responsible for the act of non-compliance, if known.

The complaint must be accompanied by all of the evidence that is available.

Exceptionally, anonymous complaints may also be accepted provided that they are sufficiently based on, and accompanied by, the corresponding evidence.

5. The Compliance Committee, within a period of seven calendar days, counting from the receipt of the complaint, will send a letter to the individual registering the complaint, acknowledging receipt of the complaint and informing him or her of the collection and processing of personal data in accordance with the established procedures in current legislation on this matter. If it considers that the information provided is not clear or complete, the Committee will request that the individual registering the complaint clarify or comment further on the specific aspects that may be relevant within a period of no more than five days.
6. In the event that: the complaint: does not meet the established requirements; the information provided is not complete - even after requesting further details -; it does not present reasonable indications of violating the Code of Conduct; the facts have been reported to any judicial body or before any administrative authority that is judging or investigating the facts; or for any other reason that is not the competence of the Compliance Committee, it will refrain from proceeding with its processing of the case. When the issue affects an institution that has its own Code of Conduct, the Compliance Committee, after obtaining the consent of the individual presenting the complaint, will forward the complaint to that institution so that it can proceed with its evaluation and processing in accordance with its own rules.
7. Once the complaint is accepted for processing, in the same letter of acknowledgment of receipt, or in a later one, after receiving the amplification of the requested information, the Compliance Committee will indicate to the person registering the complaint the possibility of adopting

precautionary measures, in the event that they have not yet been established.

8. Likewise, in the event that the complaint has been addressed directly to the Compliance Committee, the latter will send a letter to the director of the institution or to the superior of the religious community, transmitting the contents of the complaint and indicating the precautionary measures that it deems appropriate to adopt, as well as request, if considered necessary, a written report on the facts constituting the complaint, particularly when they affect the general interest or operation of the institution itself.
9. Likewise, the Compliance Committee will send a letter to the person accused, providing him or her with the contents of the complaint and indicating the purpose for which the personal data incorporated therein, and any subsequent data that may be obtained throughout the processing of the procedure, must be processed. However, when this communication entails a risk of manipulation or elimination of the evidence necessary for the investigation of the facts by the accused, the communication to the latter may be delayed up to a maximum of one month from the receipt of the complaint.

2. Development phase

- 61.** If, after analyzing the complaint and, where appropriate, the report that was requested, the Compliance Committee estimates, within a period not exceeding ten days, counting from the date of acceptance of the complaint, that there is no indication whatsoever of violation of the Code of Conduct, it will proceed to discontinue and file the proceedings, thus ending the procedure. The dismissal will be communicated in writing to both the person who initiated the procedure with the complaint and the person accused, as well as to the person in charge of the institution. Likewise, all protected personal data that appears in the file will be deleted, and the documentation provided will be returned to the person lodging the complaint, where appropriate. However, if any data are kept to provide evidence of the functioning of the Code of Conduct, they may be recorded anonymously.
- 62.** If, on the contrary, the Compliance Committee considers, within the aforementioned period, that in the facts presented, there are indications of any violations of the

Code of Conduct, a search for evidence may be opened for further investigation and verification. This decision will be communicated in writing to the person who reported the events, to the accused and to the person in charge of the institution, indicating the person or team that will be in charge of the investigation.

1. The Compliance Committee will proceed to the appointment of a case instructor, which may fall both on any of its members or on other persons outside the Committee, depending on the matter to be investigated. The investigation may not be entrusted to any person who has a direct relationship with the department or center of activity of the institution to which the complaint refers, with the facts reported, with the individual registering the complaint and other persons mentioned in the complaint brief, or with the accused or any other person with whom there may be a conflict of interest.
2. This designation may only be reasonably appealed to the Committee both by the person who reported the facts and by the person accused, as well as by the institution involved, in the event that it is able to provide a reliable account of the circumstances that correspond to those which are described in the previous paragraph, within two days from receipt of the previous communication. The Committee will issue its resolution within three days.
3. In order to carry out the required investigation, within a maximum period of twenty days from its opening, the case instructor may collect as much information, clarifications, testimonies, opinions or documentation as he or she considers necessary, as well as carry out the personal interviews that he or she also deems necessary. During these interviews and meetings, both the privacy of all people and the reputation of the institution must be preserved, and minutes will be drawn up by the case instructor and signed by both him or her, and the person interviewed. The deadline for carrying out or submitting each of these actions will be five days.
4. In any case, once the investigation is concluded, the proven facts collected will be transmitted to the person accused, so that, within a period of five days, he or she may submit in writing whatever is deemed appropriate.
5. In carrying out all of these actions, which will always be appropriate and proportionate to the circumstances of each case, total independence and impartiality will be

maintained, guaranteeing respect for the right to a hearing and the presumption of innocence of any person affected. All of the people who participate in the process are obliged to keep due confidentiality, discretion and collaboration, their indemnity being guaranteed, as well as that of those who have communicated the infraction.

3. Completion or resolution phase

- 63.** In view of the actions carried out, the Compliance Committee, within a maximum period of ten days from the conclusion of the investigation, will propose to the director of the institution or the superior of the religious community or, if they were responsible for the non-compliance or infraction, to the corresponding Delegate of the Provincial or, where appropriate, to the Provincial himself, the adoption of the appropriate sanctions or measures, sanctioning in accordance with labor regulations, those breaches or infractions that constitute offenses of this nature, without prejudice to administrative responsibilities or criminal acts that may occur, which must be immediately brought to the attention of the competent administrative or judicial authorities by the person in charge of the institution. The Compliance Committee will also propose those measures that allow for the repair or, at least, abatement of the damage caused.
- 64.** In the case of infractions committed by collaborators, the Compliance Committee, depending on the seriousness and repetition of the offense, will propose whether there is to be a reprimand, or whether the established collaboration should be terminated, also without prejudice to the administrative or criminal responsibilities that may occur, which must be immediately brought to the attention of the competent administrative or judicial authorities by the person in charge of the institution. It will also propose those measures that allow for the repair or, at least, abatement of the damage caused.
- 65.** When the person responsible for an infringement or non-compliance with the Code of Conduct, is a member of the Society of Jesus, the proposed measures will be directed,

according to established procedures, to the Provincial or to the “*Delegado para la Tercera Edad*” and its Preparation.

- 66.** The director of the institution or the superior of the religious community will inform the Compliance Committee of the adoption and contents of the measures applied.
- 67.** When there are no doubts regarding the facts reported, or whenever they have been confessed by the offender, the Compliance Committee may resolve without the need to open a further investigation.
- 68.** The file will not necessarily have to end without further proceedings upon a dismissal, or with the proposal of sanctions or disciplinary measures, being able to do so independently of this in the form of recommendations, warnings or other measures. Likewise, when the issue at hand warrants this, and those individuals involved agree, a process of mediation may be opened.

4. Appeal phase

- 69.** An appeal may be filed against the decision adopted by the director of the institution or the superior of the religious community within seven days, which will be resolved by the corresponding Delegate of the Provincial or, where appropriate, by the Provincial himself. When the decision has been adopted by the latter two, the appeal will be presented to the Provincial.

Once the appeal has been filed in writing to the postal address: Avenida de la Moncloa, 6, 28003, Madrid, SPAIN, the Provincial or the appropriate Delegate will collect the following documents:

- The complete file of the actions carried out by the Compliance Committee.
- The resolutions adopted by the director of the institution or the superior of the religious community.
- Reports from the Compliance Committee in relation to the resolution of the case, and from the director or superior who adopted the measures, if deemed necessary.

The Provincial or his Delegate will resolve the case within one month from the filing of the appeal.

5. Existence of other responsibilities

- 70.** If a dismissal has been delivered, the investigation shows sufficient indications of the false nature of the contents of the complaint, or the person registering the complaint having acted maliciously or with manifest recklessness, the corresponding case file will be initiated to determine, where appropriate, any liabilities which could be incurred. It will be understood that good faith is lacking when the complaint is made with the intention of revenge, harassment, causing employment or professional damage or damaging the honor of the person denounced or of a third party.
- 71.** When there are administrative or criminal liabilities, collaboration will always be given to the investigation of the facts by providing evidence throughout the procedure to clarify them; the Committee will proceed as soon as possible to repair or reduce the damage caused by the offense or crime, and effective measures will be established to prevent and disclose the infractions that in the future could be committed with the means available, or under the coverage of any institution of the Society of Jesus in Spain.
- 72.** In the event that a natural person has been the victim of a crime, apart from establishing, as soon as possible, the measures that are deemed most convenient to repair or reduce the damage caused, the necessary support will be provided to eliminate the consequences of any nature that may have been caused.