

# Code of Ethics



**Ports de Balears**



*Autoritat Portuària de Balears*

**Ports of the Balearic Islands**

**Port Authority of the Balearic Islands**

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# FIRST PART

About this Code

## 1.1. Introduction and words of the Chairman

Dear collaborators,

It is my pleasure to present the revision and update of the Code of Ethics of the Port Authority of the Balearic Islands (APB); a document analysed and renewed with the objective of reinforcing our commitment to issues related to legal compliance and ethical principles. This update, within a philosophy of continuous improvement, aims to adapt to our environment and to the people, companies and institutions with whom we interact and represents the firm intention to build a business culture based on integrity and ethics.

On 3 February 2016, our Board of Directors approved a first version of the Code of Ethics, specifically aimed at the people who work at APB, which we have endeavoured to communicate and implement. We now believe it is the appropriate time to review, expand and improve the APB Code of Ethics and adapt it to our progress and new commitments.

Therefore, since 2019 APB has voluntarily adopted the principles derived from the United Nations Global Compact called THE UN GLOBAL COMPACT, relating to human, labour, environmental and anti-corruption rights. These principles committed us to actively work on the policies necessary to make them effective and since then we have striven to incorporate them into our daily operations.

In fact, this update is not an isolated exercise but is part of and incorporated into the design and development of a new Corporate Social Responsibility plan that aims to integrate sustainability into our strategy, committing us to concrete and measurable contributions towards the Sustainable Development Goals (SDGs). Through this Code of Ethics, we extend our commitment to all our stakeholders, because we believe that only together will we be able to achieve the global goals proposed by the United Nations 2030 Agenda.

Furthermore, this Code has also been expanded to address the concerns and expectations of our Stakeholders demonstrated in a thorough materiality analysis on aspects related to transparency, ethics and integrity.

Finally, this Code will also have an immediate practical utility as it will be incorporated as another element of our APB's Anti-Fraud Measures Plan, drawn up to facilitate compliance with the different anti-fraud requirements established at EU, national and regional level, in the context of the management of funds from Spain's Recovery, Transformation and Resilience Plan.

Finally, I would appreciate it if you could pay close attention to the responsible practices proposed by this Code of Ethics, approved and adopted once again by the Board of Directors, and apply its principles and guidelines in your day-to-day responsibilities. Thank you very much for your collaboration.

Best regards,

Francesc Antich Oliver  
Chairman of the APB

## 1.2. Mission, vision and values of the Port Authority of the Balearic Islands

This Code of Ethics is intended to document how APB's values are to be translated into routine guidelines that reflect our commitments. It sets out and explains the attitudes that we expect and allow, as well as those that do not fit in with our culture and are therefore not acceptable within our organisation.

### Our Mission

To guarantee the supply and maritime connectivity of the Balearic Islands in the most efficient and safe conditions, and to facilitate the socio-economic activities that contribute to their development, in terms of economic and environmental sustainability and integration.

### Our Vision

To be ports that are international benchmarks in service excellence for maritime transport and recreational boating and its industry, as well as in sustainability, respect and integration with cities and their socio-economic environment, all through technological innovation.

### Our Values

We understand our values in a very practical way: they are the tools that will allow us to manage and achieve our vision. They must be present in everything we do and guide our relationships with all our stakeholders, and namely:

- Service-minded attitude
- Innovation
- Transparency
- Recognition
- Collaboration
- Responsibility (Environmental, social and technological)
- Continuous improvement-will to succeed

## 1.3 Purpose and scope of our code

In the context described above, this code establishes the rules and criteria that are to guide the decision-making, professional responsibilities and relations with our stakeholders of personnel from the Port Authority of the Balearic Islands.

By applying the Code of Ethics, the people who carry out their activities at APB demonstrate integrity, professionalism and responsibility at all times. Furthermore, they contribute to the effective deployment of APB's commitment as a public service institution, avoiding, not tolerating and denouncing conduct that may damage its culture and reputation.

The Code of Ethics constitutes an express and comprehensive declaration of the principles, commitments and standards of conduct that are to guide the performance of all APB personnel, promoting exemplary behaviour based on the ethical values and formal commitments to professional conduct contained herein.

## 1.4. Our stakeholders

APB has developed a detailed process of relational identification with its stakeholders, documented in the procedure IT-PE-PLA-03-B, which takes into account the following groups:

- a) Members of the Board of Directors.
- b) Employees.
- c) Clients, users and consumers.
- d) Suppliers, partners and collaborators.
- e) Governments, public administrations and regulatory bodies.
- f) Local community and society in general.
- g) NGOs and organisations related to the environment.

This Code of Ethics will be published on the APB corporate website and its latest version will be available to all of them.



CLIENTS, USERS AND CONSUMERS

NGOS AND ENVIRONMENTAL ASSOCIATIONS

LOCAL COMMUNITY AND SOCIETY IN GENERAL

GOVERNMENTS AND PUBLIC ADMINISTRATIONS

SUPPLIERS, PARTNERS AND COLLABORATORS

EMPLOYEES

MEMBERS OF THE BOARD OF DIRECTORS

## SECOND PART

Principles, commitments to professional conduct and responsible practices at APB

## 2.1 Principle of legality

At APB, the principle of legality, i.e. the obligation, without exception, to strictly comply with the laws and regulations in accordance with the legislation in force and to abide by internal policies and regulations, is a priority requirement.

In this sense, all persons subject to this Code must be aware of their obligation and commitment to carry out their professional activity in a legal manner and to fully respect the commitments and obligations assumed by APB in its contractual relations with third parties, as well as the customs and good practices set out in this document.

The directors of APB shall be particularly familiar with the laws and regulations affecting their respective areas of activity and shall ensure that the professionals reporting to them receive adequate information and training to enable them to understand and comply with the legal and regulatory obligations applicable to their work.

## 2.2 Professionalism, impartiality and integrity

All APB personnel must act ethically, honestly and in good faith, ensuring strict compliance with the law in order to prevent any illegal activity.

Impartiality and integrity are fundamental elements of APB's activities, and it is therefore of paramount importance that the evaluation and decision-making processes are not affected by pressures from outside the process itself that seek to influence the outcome. Any interference by internal or external individuals or organisations attempting in any way to violate this principle shall be immediately brought to the attention of the APB ethics office.

The internal or external relationships that APB managers or employees establish by virtue of their position or job shall not be used for their own benefit or that of third parties, nor shall they in any case compromise the integrity that characterises APB's actions at all times.

## 2.3 Respect for people and human rights

APB defends and promotes respect for people, compliance with human and labour rights and is committed to the application of regulations and good practices in terms of employment conditions, health and safety.

APB does not tolerate any kind of discrimination concerning race, religion, age, nationality, gender or any other personal or social condition prohibited by law, paying special attention to the care of people with disabilities or handicaps and always seeking the long-term development of human relations based on trust and mutual respect. APB has set up an Equality Committee to define and implement its own Equality Plan.

APB fosters an environment of cooperation and teamwork in order to make the best use of all skills and resources. APB employees must work efficiently, making the most of the time and resources at their disposal and trying to provide the maximum value in all processes in which they participate.



## 2.4 Social, environmental and quality commitment

APB has an integrated management system as a key to transparency, service quality and sustainable development. The Presidency and Management of APB, as the Governing and Management Bodies respectively, are responsible for ensuring knowledge of and compliance with the “Quality, Environment and Document Management Policy” in relation to the services provided within the framework of excellence, commitment to continuous improvement and customer and user satisfaction.

This Policy serves as a reference framework for establishing integrated management objectives, aligned and compatible with the strategy and its context. It is periodically reviewed by APB and is available to all interested parties in several languages.

Likewise, APB, through the Spanish Network, has expressed at the highest level and documented its commitment to the continued support of the Global Compact, the 2030 Agenda for Sustainable Development initiative and its principles.

## 2.5 Transparency, image and reputation

Transparency of information is a basic principle that governs the actions of APB. In this sense, the authority, as a public entity at the service of customers and citizens, is committed to providing truthful, appropriate and useful information on the programmes and actions it carries out.

In this way, APB is in line with its obligation to respond rigorously and objectively to stakeholder demands for information, without compromising that which could be considered sensitive for reasons of public interest or because it belongs to the private sector.

On the other hand, APB’s institutional image and reputation must be preserved and valued. Therefore, all persons subject to this Code will promote and ensure respect for and appropriate use of the image, brand and reputation of APB by all its members and by any entity with which they come into contact.

They will be especially careful in any public intervention before the media, professional conferences or seminars, when attending meetings organised by national and international public bodies and in any other public action in the name and on behalf of APB. In this regard, members of the organisation may not, under any circumstances, issue personal opinions through social networks or other channels, identifying themselves as representatives or members of the organisation, and must state for the record that these are solely and exclusively personal opinions and do not necessarily represent the official opinion of APB.

## 2.6 Confidentiality, data protection and obligation of professional secrecy

APB personnel, as well as the members of the Board of Directors, are obliged to protect the information and knowledge generated within the organisation, as well as its ownership or custody.

Both members of the Board of Directors and APB employees shall refrain from using for their own benefit any data, information or document obtained in the course of their professional activity. Nor shall they disclose information to third parties, except in compliance with the applicable regulations or when expressly authorised to do so. Likewise, they shall not use confidential data, information or documents from third parties without their prior written authorisation.

The members of the Board of Directors and APB personnel undertake to maintain confidentiality and to use any data, information or document obtained during the exercise of their responsibilities in the entity in accordance with the internal regulations on the matter. In general, and unless they are instructed otherwise, the information to which they have access must be considered confidential and may only be used for the purpose for which it was obtained. Likewise, they must not make duplicates, reproduce or use the information for any purpose other than that necessary for the performance of their tasks, nor must they store it in information systems that are not owned by APB, except in the cases and for the purposes expressly authorised.

Likewise, APB personnel must know and respect all internal procedures implemented with respect to the storage, custody and access to data and which are intended to guarantee the different levels of security required in accordance with the nature of such data, as established in APB's document management system.

Under no circumstances shall APB employees consult or request confidential information on files for which they have no direct or indirect responsibility. Any reasonable indication of leakage of confidential and reserved information and/or its private use must be reported by those who are aware of it to their immediate superior or, where appropriate, to the APB ethics office.

The obligation of confidentiality shall continue to apply even after the termination of work, employment or professional relationships.

APB will have the necessary technological tools and systems in place to ensure that the information can be properly protected and secured from unauthorised access. Access to information and/or IT resources shall be based on the principle of least privileges, for personnel to carry out the tasks entrusted to them and in the appropriate modality for this purpose. All personal data are adequately protected to prevent any unauthorised disclosure or modification, and the necessary control mechanisms and procedures are in place to prevent any unauthorised access, copying, transfer or disclosure. Persons subject to this code who, due to their function, have been given access to the systems, networks and files that process or store personal data, are responsible for keeping their passwords confidential in order to prevent their disclosure.

All natural persons from whom data are required have the right to contact APB to request to be informed of the data held on them, as well as to exercise their right to rectification or cancellation except by legal or contractual obligation.

## 2.7 Intellectual and Industrial Property Rights

APB is committed to the protection of its own and others' intellectual and industrial property. This includes, but is not limited to, copyrights, patents, trademarks, domain names, and reproduction, design, database extraction and know-how rights.

All persons subject to this Code must respect the intellectual property and the right of use that corresponds to APB in relation to documents, knowledge, processes, brands, courses, programmes and computer systems, and in general, any work developed or created by APB, whether as a result of its professional activity or that of third parties.

They must also respect the intellectual and industrial property rights held by third parties outside APB, and in particular, they may not incorporate, use or employ in the Entity any type of physical or electronic information or documentation belonging to a third party, which has been obtained as a result of a previous position or activity without the due consent of its owner.

APB personnel are expressly forbidden to use works, creations or distinctive signs of intellectual or industrial property belonging to third parties without proof that the organisation has the corresponding rights and/or licences, and shall adopt the necessary measures to protect such property. This entails ensuring that processes and decisions in this area are traceable, in the sense of being documented, justifiable and verifiable, in particular by means of the titles of the works, creations

or distinctive signs themselves and the application of contractual clauses guaranteeing the originality and peaceful use of those of third parties.

Intellectual and industrial property resulting from the work of employees during their stay in the organisation, and which is related to present and future business, shall be the property of APB.

## 2.8 Controls over financial reporting

APB has an adequate system of internal control over the preparation of financial information, guaranteeing regular supervision of its effectiveness.

To this end, APB also undertakes to provide its employees with the necessary training so that they are aware of, understand and comply with the commitments established by the organisation in matters of internal control over financial reporting.

APB periodically submits itself to the mandatory processes of control and rendering of accounts by the General Intervention Board of the State Administration (IGAE), the Court of Auditors and the Public Body Puertos del Estado, in addition to its own internal controls.

## 2.9 Conflicts of interest

Port Authority employees must at all times avoid situations that could lead to a conflict between their personal interests and those of the company.

They must also abstain from representing the company and from intervening in or influencing the taking of decisions in which, directly or indirectly, they or a third party linked to them, have a personal interest.

They may not use their position in the organisation to obtain financial or personal benefits or business opportunities of their own, and they must refrain from taking any decision from which they might be suspected of obtaining a personal benefit or acting against the interests of APB, avoiding any risk of calling into question the impartiality and honesty of their actions.

## 2.10 Gifts and presents

APB unequivocally rejects any appearance of corruption, bribery or extortion, and declares itself opposed to influencing the will of others in order to obtain any benefit through the use of illegal or unethical practices.

As a general rule, no APB employee may offer, grant, solicit or accept, directly or indirectly, gifts or handouts, favours or compensation, in cash or in kind, whatever their nature. Exceptionally, the giving or acceptance of gifts is permitted in any of the following circumstances:

- promotional items, of an advertising nature and of merely symbolic value.
- proportionate and reasonable expenses and hospitality arising from participation in or attendance at conferences, congresses, seminars or similar events of a scientific, technical or altruistic nature.

Any gift or handout received in contravention of this Code must be returned immediately, explaining the Port Authority's policy and notifying the APB ethics office of this. If it is not reasonably possible to return it, the gift will be handed over to the APB ethics office which, after issuing the corresponding

receipt, will proceed to return it or, if this is not possible, allocate it, if appropriate, to the purposes of social interest approved by the Board of Directors, leaving the whole process duly documented.

Gifts of cash are expressly prohibited.

In any situation of doubt or observation of corruption or bribery, APB personnel shall inform the company through their line manager and/or the ethics office.

## 2.11 Responsible use of APB property and equipment

APB provides its personnel with the resources necessary for the correct performance of their professional activity and undertakes to provide the means for the protection and safeguarding of these resources. Each person is responsible for the correct use and protection of these resources, which include: intellectual property, facilities, equipment, furniture, financial resources and other elements provided by APB,

They shall only be used for professional purposes and never for personal ones, and any improper use that could prejudice the interests of APB is forbidden.

Employees must be aware that the documents and data contained in APB's information technology systems and equipment may be subject to review by the competent units of the organisation, or by third parties appointed by the organisation, when deemed necessary and permitted by the regulations in force.

## 2.12 Health and safety at work

One of APB's priorities is to safeguard and improve working conditions and safety in all its facilities, as well as the safety of its employees and external collaborators at client facilities. It therefore actively promotes the adoption of health and safety at work policies and measures and adopts the preventive measures established in current legislation,

All APB personnel and external collaborators must know and comply with the health and safety at work regulations and ensure their own safety and that of all persons who may be affected by their activities.

Likewise, APB considers the consumption of illegal drugs or alcoholic beverages to be totally incompatible with the full and responsible performance of work activities. Along these lines, APB is committed to providing help to employees who may need it as a result of drug or alcohol addiction.

APB will provide its personnel with the necessary resources and training to enable them to carry out their duties safely and in a healthy environment.

## 2.13 Performance of other professional activities

APB employees may only carry out work and professional activities other than those carried out in the entity when these are duly authorised in accordance with the legislation on incompatibilities of personnel in the service of the Public Administrations, without implying less efficiency in the performance of their duties or any conflict of interest whatsoever.

In any case, employees, and especially APB managers, when performing their activity, shall always give priority to the interests of APB over personal interests or those of third parties that may influence their decisions or actions.





## THIRD PART

Guidelines for responsible conduct  
required of APB staff in their dealings  
with our stakeholders

### 3.1. APB's behavioural guidelines for dealing with its employees

- We will protect employees in the exercise of their work.
- We will provide employees with the necessary information for the development of the work entrusted to them and their integration into the organisation.
- We will take care of collaboration and especially interdepartmental communication, sharing the necessary information to achieve common objectives.
- We will provide employees with the tools and training sessions for the correct development of their work.
- Communication and active recognition will be the organisation's basic motivation tool.
- We will preserve the confidentiality of the information entrusted to us by our employees.
- We will not tolerate verbal or behavioural disrespect between employees from any level of the organisation.
- We will ensure and guarantee compliance with internal regulations and policies.
- We will act decisively against any form of direct or indirect discrimination associated with race, colour, age, gender, nationality, disability, ideology, religion, sexual orientation, marital status, family burdens, hierarchy or others.
- We will observe the parameters of competence, professional worth and merit, good performance, and the effective implementation of our values in our work.
- We will foster a culture of positive recognition and improvement in all directions.
- We will not tolerate any form of threat, harassment, abuse of power or coercion in the workplace.
- We will uphold the rights of our employees, internally and in all appropriate bodies.
- We will take decisions affecting the working conditions of our employees objectively and within the established legal framework.

<b>Aligned with our Values (We Want / We Do / We Are)</b>	<b>Against our Values (We Don't Want / We Avoid / We Are Not)</b>
<i>People-oriented leaders</i>	<i>Authoritarian or coercive bosses</i>
<i>We recognise a job well done</i>	<i>Destructive criticism</i>
<i>We listen to input from our teams and colleagues</i>	<i>Listening selectively, shunning or ignoring some people</i>
<i>We respect individuals and teams equally</i>	<i>Discrimination of any kind</i>
<i>Transparent and skill-based assignment of tasks</i>	<i>Arbitrary allocation of work</i>
<i>People are more important than their jobs</i>	<i>Getting results at all costs</i>

## 3.2. Behaviour patterns for employees in their relationship with APB

- We will protect the organisation's reputation, being aware of our responsibility as employees and ambassadors of its identity, culture and values.
- We will preserve appropriate confidentiality with regard to the information to which we have access in our work place.
- We will avoid using the organisation's tangible and intangible assets, and the information to which we have access in our workplace, for our own personal benefit or that of our close associates and/or family members.
- We will show professional loyalty in our daily behaviour and a proactive attitude towards the organisation and the achievement of its objectives.
- We will work professionally and as a team with the other areas of the organisation.
- We will take advantage of the training offered to us.
- We will avoid the abuse of power in any form.
- We will accept debate and constructive criticism to help us improve our work.
- We will maintain a service-minded attitude with the areas of the organisation for greater collective efficiency.
- We will avoid unjustified expenses to the organisation.

<b>Aligned with our Values (We Want / We Do / We Are)</b>	<b>Against our Values (We Don't Want / We Avoid / We Are Not)</b>
<i>Honesty and internal transparency</i>	<i>Ulterior motives and hidden interests</i>
<i>Sense of belonging</i>	<i>Badmouthing the organisation</i>
<i>Proactivity</i>	<i>Passivity and disinterest</i>
<i>Information sharing</i>	<i>Opacity and lack of communication</i>
<i>We learn from our mistakes in order to move forward</i>	<i>We punish failure</i>



### 3.3 Behaviour patterns with other people working at APB

- We will be respectful with our colleagues, avoiding any kind of disrespect or lack of fellowship in our relationship, treatment or language.
- We will encourage transparent communication, based on trust, and will share the information necessary for the alignment and achievement of common objectives.
- We will seek to work as a team, offering our support to take advantage of interdepartmental synergies.
- We will avoid creating or being complicit in situations of discord, discrimination and isolation of colleagues.
- We will respond to requests for information and avoid unnecessary delays.
- We will attend the meetings to which we are summoned or decline to attend, informing the person summoning us of our inability to be present.

<b>Aligned with our Values (We Want / We Do / We Are)</b>	<b>Against our Values (We Don't Want / We Avoid / We Are Not)</b>
<i>We respect our colleagues</i>	<i>Making value judgements and labelling people</i>
<i>We work as a team</i>	<i>Withholding information and individualism</i>
<i>We share knowledge</i>	<i>Organisation with watertight compartments</i>
<i>We create relational spaces</i>	<i>Participating in rumour spreading and</i>
<i>We are professionals</i>	<i>Burdening others with your work</i>

### 3.4. Behaviour patterns with the State and other public administrations

- In all our actions we will be guided, above all, by the general interest to which we owe ourselves as public employees and to which the APB owes itself as an institution.
- We will practice and effectively promote coordination and transparency in our relations with the local, regional and state public administration, aware that we are part of it.
- We will be agile and clear in our communications and relations with other bodies of the State Administration and with other administrations.
- We will foster trust in relations, valuing and sharing successes.
- We will share tools and resources to simplify tasks and we will collaborate effectively and efficiently in our mutual interest.
- We will facilitate better governance through a positive and proactive attitude, seeking to streamline tasks and communicating with clarity and transparency.
- We will actively contribute to making it possible for the public administrations to which it corresponds and which need it, to have spaces and conditions available for the development of their functions directly related to port activity.
- We will progressively adapt to new technologies in order to improve services.
- We will not hinder the procedures and needs of the public administrations, avoiding unnecessary delays in the processing and management of documentation.
- We will respect and promote the principles of cooperation and institutional loyalty within the competency framework established by law and the Spanish Constitution.

<b>Aligned with our Values (We Want / We Do / We Are)</b>	<b>Against our Values (We Don't Want / We Avoid / We Are Not)</b>
<i>We do our work as efficiently as possible</i>	<i>Hinder or delay procedures</i>
<i>We collaborate as much as possible, facilitating coordination and show loyalty and respect for the current framework of competences.</i>	<i>Hinder the work of other administrations</i>
<i>We share success</i>	<i>Personal protagonism</i>
<i>We try to do better and better</i>	<i>It has always been done this way</i>

### 3.5. Behaviour patterns for our users and customers

- We will not accept, nor will we demand, the giving of money or any other type of gifts, presents or handouts intended to influence our decisions.
- We will be quick and efficient in responding to user requests, speeding up procedures as far as possible.
- We will not give internal information that the user does not need or should not know.
- We will avoid speaking ill of colleagues, superiors or collaborators, or of the organisation itself, to external users.
- We will show professional diligence with users, seeking to solve problems with solutions that reconcile their interests with the general interest.
- We will protect the information and data that users entrust to us.
- We will support the use of new technologies aimed at improving communication and simplifying and optimising the process of responding to users.
- We will maintain a cordial, close, transparent and respectful relationship with all users, making known the services offered by the ports and their conditions.
- We will not allow disrespectful, patronising or unequal treatment of users.

<b>Aligned with our Values (We Want / We Do / We Are)</b>	<b>Against our Values (We Don't Want / We Avoid / We Are Not)</b>
<i>We like to do our job well</i>	<i>We give any convenient answer</i>
<i>We want to help, we give facilities and options</i>	<i>We delay, hinder and make tasks difficult</i>
<i>We transmit confidence, sincerity and optimism</i>	<i>We impede and withhold information from users</i>
<i>We are cordial and close to users</i>	<i>Unequal treatment, superiority attitude towards the user</i>

### 3.6. Behaviour patterns towards our suppliers

- We will not accept cash or other gifts, presents or handouts intended to influence our decisions.
- We will speed up the certification of work well done as well as payment of the same, fulfilling our contracts.
- We will have a positive and cooperative attitude in our relationship with the supplier while defending the general interest to which we are bound.
- We will be effective and efficient in our dealings with suppliers, supporting the use of new channels and technologies to speed up their fulfilment.
- We will offer transparency in contracting procedures and criteria.
- We will verify, check and, where appropriate, demand the normal and proper fulfilment of the supplier's obligations, in order to protect the general interest to which we are bound.
- We will set up mechanisms to extend our social responsibility criteria to our supply chain.
- We will prevent internal disputes from having repercussions on our relationship with suppliers.

<b>Aligned with our Values (We Want / We Do / We Are)</b>	<b>Against our Values (We Don't Want / We Avoid / We Are Not)</b>
<i>We care about our suppliers</i>	<i>Exercising passive or abusive power in relationships</i>
<i>We look for ways to streamline processes through new technologies</i>	<i>Unjustified delays in payments</i>
<i>Transparency and fairness in contracting</i>	<i>Choice based on personal interests</i>
<i>We collaborate with suppliers</i>	<i>Generate insecurity in the relationship</i>

### 3.7. Behaviour patterns towards society as a whole

- We will transmit the functions of the organisation and of the ports and maritime signals (and their role at the service of the economic and social fabric of our Islands, and how they are integrated into their cities and their environment), as being serious and responsible, but at the same time open, close, transparent and efficient.
- We will be sensitive to social needs, especially those of the most disadvantaged groups or those at risk of exclusion, which may be affected or alleviated by our activity.
- We will actively listen to the needs and proposals put forward by the different groups in society, in particular those to which our activity can provide a response.
- We will evaluate and minimise the environmental impact of our work, with prudent and rational use of resources.

<b>Aligned with our Values (We Want / We Do / We Are)</b>	<b>Against our Values (We Don't Want / We Avoid / We Are Not)</b>
<i>We listen to society</i>	<i>Insensitivity, discriminatory or unequal</i>
<i>Transparency</i>	<i>Secrecy</i>
<i>We will transmit the fact that our infrastructures, primarily for port uses, are available to society.</i>	<i>Lack of knowledge of ports and port activities.</i>
<i>We care for the environment</i>	<i>Ignoring the environmental impact of our activity</i>

# FOURTH PART

## Implementation and management of our Code of Ethics

## 4.1 Implementation and acceptance of the Code of Ethics

This revised version of APB's Code of Ethics came into effect after its approval by APB's Board of Directors on 28/09/2022.

All current and possible new members of APB will be informed about this code and its enforceability. It will remain in force until its modification or cancellation is approved, which will be duly communicated. Failure to comply with this Code may lead to the adoption of disciplinary measures as defined by APB in its disciplinary regime.

This Code attempts to address many of the situations we face on a day-to-day basis, but it cannot address all of them. APB has put in place the mechanisms for defining and communicating the Code, but we are all responsible for complying with and enforcing its spirit and letter.

It is impossible to cover every possible situation in which any employee may find themselves. These pages contain a series of guidelines determining your behaviour and decisions at all times, especially in complex, doubtful or pressurised situations. In situations that are not covered directly, there are other documents and internal regulations that you should consult, as well as using your common sense and conversing with your superiors. Both the Code of Ethics itself and the rest of the policies and regulations are protected by a series of internal working procedures that guarantee their compliance and give them credibility. This document does not replace any legislation, conventional standards or covenants applicable to APB and its employees but is intended to be a framework for coexistence inspired by values that facilitates internal and stakeholder relations.

The image of our organisation depends on our daily relationship with our stakeholders. This relationship must be based on ethics and responsibility in order to be sustainable and create value for all.

In relation to the application of this Code of Ethics, it is important to point out that all employees must collaborate diligently in any related review, consultation, investigation or verification processes that may arise, providing the information required.

Likewise, all APB members are required to undergo mandatory training to know and understand this Code of Ethics, so that they can rely on it and its operating mechanisms in the proper manner.

Finally, it is important to remember that APB does not discriminate or retaliate against employees for reporting, in good faith, any violations of this Code.

## 4.2. Organisation and functioning of the Code of Ethics

### APB Code of Ethics Committee

To ensure effective implementation of the Code of Ethics and its principles, APB has established an Ethics Committee. The following are members of the Ethics Committee, according to their positions:

- Head of Human Resources Organisational Unit
- Head of the Secretariat and Legal Affairs Organisational Unit
- Director of APB
- Head of Quality, Environment, Innovation and CSR
- Head of Management Control Division
- Chairman of the APB Works Council or a legal representative of the employees appointed by the Works Council.

- (Optional external Ethics Advisor)

The Ethics Committee may request the presence of an employee or even an external agent or representative of stakeholders as it deems appropriate.

If a member of the Ethics Committee is affected as a result of a complaint, the Chairman of APB will provisionally appoint a new member to replace him or her. Membership of the Ethics Committee shall not entail any bonus or salary benefit.

### Ethical channels

Any APB employee or stakeholder can use the channels of the Code of Ethics to make an enquiry or report a complaint. Queries and complaints should be sent to the following e-mail addresses:

[consulta.codigo@portsdebalears.com](mailto:consulta.codigo@portsdebalears.com)

[denuncia.codigo@portsdebalears.com](mailto:denuncia.codigo@portsdebalears.com)

The Human Resources division shall be responsible for managing both channels, although all members of the Committee shall receive communications through these channels simultaneously.

Requests for information or queries shall be registered and answered within a maximum period of 14 (fourteen) working days. Even if the response requires further research or documentation, receipt shall be acknowledged and a response shall be given explaining the reasons why a longer period is required.

Any complaint shall be acknowledged and responded to within seven (7) working days, even if further analysis of the seriousness of the complaint and the actions required is necessary.

Whistleblowing processes do not override the normal systems and procedures of work supervision and the logical hierarchical order of the organisation. Upon receipt of the complaint, the Ethics Committee shall decide how to proceed.

The Ethics Committee shall decide whether it can assess the complaint on the basis of the information available to it or whether it requires internal instructions.

If the members of the Ethics Committee consider that the action in question may be of disciplinary relevance, the Committee will inform the Board of Directors and, if appropriate, include a proposal for a sanction.

APB guarantees that no reprisals will be taken, directly or indirectly, against those persons who, acting in good faith, report suspicions or complaints regarding breaches of this Code or of the law by APB itself or any of its members. It also guarantees the right to honour, privacy, defence and the presumption of innocence of those considered to be in default.

### Documentary control: versions and reviews of the Code of Ethics

This Code of Ethics will be reviewed at least every two years. The Human Resources division, responsible for the Ethical channels, will collect information related to complaints and queries and will prepare an annual report to be submitted to the Ethics Committee, proposing the appropriate reviews to the text for its better use and understanding by employees.

In addition, after the annual report and analysis of queries and non-compliance, periodic improvement plans can be drawn up to correct priority or repeated situations (e.g. if statistics show that employees have not been sufficiently informed about an issue, training on this issue must be reinforced).



We can all send our suggestions or proposals for improvement to the Consultation Channel.

Maximum dissemination of this Code of Ethics will be sought, ensuring sufficient versions and formats (paper, online, etc.) as well as in different languages (Spanish and Catalan).

A copy of this Code of Ethics can be requested by e-mail from the Ethics Channel:

[consulta.codigo@portsdebalears.com](mailto:consulta.codigo@portsdebalears.com)

It can also be downloaded from the APB's corporate website.



**Ports de Balears**

Autoritat Portuària de Balears

**Ports of the Balearic Islands**

**Port Authority of the Balearic Islands**