CODE OF CONDUCT

Cast

ITALIAN INSTITUTE
OF CULINARY ARTS
& HOSPITALITY

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Introduction

The Plena Education Group (hereinafter also referred to as the "Group"), together with its Schools, aspires to be a model of **academic excellence**, basing every activity on the values of **quality, responsibility, professionalism, fairness, and honesty.** We believe that education is a transformative force, capable of shaping aware individuals and inspiring a positive and lasting impact on society. Through our daily commitment, we aim to shape citizens and professionals who embody these values, actively contributing to building a more equitable, inclusive, and sustainable future.

Our goal is to create an educational and professional environment that inspires trust, promotes personal growth, and fosters innovation. Our choices and actions are guided by the commitment to pursue the highest quality in educational, administrative, and decision-making processes, maintaining a balance between academic rigor, strategic vision, and attention to the needs of our community and stakeholders.

Our strength lies in collaboration: every member of the community is called to respect the principles of this Code, actively contributing to promoting a climate of trust and shared responsibility.

Purpose of the document

The Code of Conduct defines the principles and rules that govern relationships within the academic community, in line with a culture of responsibility and the commitment to build a respectful environment guided by the highest moral, ethical, and social standards. Its goal is to **prevent discrimination, abuse, and conflicts of interest**, ensuring a **positive organizational climate** and an educational and working context that fosters **personal and professional growth**.

By promoting virtuous behaviors, the Code strengthens trust and cohesion among community members, helping to prevent unethical or illegal conduct. Through the description of "*expected behaviors*," the Code not only regulates improper conduct but represents a **proactive vision of ethics**, focused on **positive actions** inspired by the Group's core values. More than a set of rules, the Code is a **concrete and inspirational guide** for everyone's choices and for the strategic direction of the entire institution.

Recipients and scope of application

The Code of Conduct applies to all Schools of the Group and to all members of the academic community, each of whom has the responsibility to adopt behaviors consistent with the values and principles described. The recipients of the Code include:

- **"The student body"**: students enrolled in degree programs, professional courses, or individual training activities, including scholarship holders and researchers.
- **"The faculty"**: teachers, professors, and lecturers, including those visiting from other universities or schools.
- **"The staff"**: technical-administrative personnel and management, whether permanent or temporary, including interns, temporary workers, collaborators, and consultants.

The Code **applies in any context related to the activities of the Schools of the Group**, including initiatives organized during school activities or by student organizations, extracurricular activities, internships, educational trips, and communications made via email, social media, instant messaging, or other digital platforms.

Furthermore, the Code extends to all situations involving legal investigations or disciplinary proceedings, raising doubts about eligibility to attend an educational institution as a student, teacher, or staff member, or that pose a risk to the well-being and harmony of the academic community. It also applies to incidents that occur outside the premises of the Schools, providing support and guidance to students and members involved, regardless of the location of the incident.

How to behave in situations of uncertainty

The Code cannot provide specific recommendations for every situation. When we are uncertain or not feeling particularly comfortable in a situation, we should learn to ask ourselves the right questions:

- *Am I doing the right thing?*
- *Am I observing the values and principles of the Code of Conduct?*
- *Is my behavior in line with my responsibilities?*
- *Am I maintaining a professional attitude?*
- *Would I feel comfortable if my actions were made public?*

If the answer to even one of these questions is "No," or if we have any doubt about the legitimacy of our actions or the application of a principle or standard of behavior, we must stop and seek advice through the most appropriate channel. Expressing doubts and asking questions helps us manage situations properly and resolve any issues.

You have our trust

We trust every member of our community to do the right thing and work with integrity. Our educational mission is based on values of transparency, fairness, and mutual commitment, and each of us has the responsibility to contribute to the success and well-being of the community. The trust we place in each of you is essential for the growth and development of our Schools.

You have the responsibility

Your role is crucial in ensuring that the School maintains a healthy and respectful study and work environment, where values and the educational mission are always at the heart of every decision and behavior. Every member of the community, whether student, faculty, or staff, is responsible for contributing positively to the institution's reputation, adhering to the rules, and supporting a fair and collaborative environment.

You can count on us

If you ever find yourself struggling to make a decision or have doubts about how to behave in a particular situation, we are here to support you. You can rely on internal resources, such as the Secretariat and Management offices, to receive guidance and clarification.

You have the right to speak up

Every voice matters. If you believe something is not right or are concerned about inappropriate behavior, we encourage you to express your concerns. We are committed to maintaining an environment where opinions are heard and respected. Additionally, we do not tolerate retaliation against those who raise an issue or make a report, as our goal is always collective improvement and respect for all members of the community.

Our Values

Our values define who we are, what we believe in, and the vision we share. They guide our daily actions, inspire our commitment, and shape every relationship and decision we make, building a community based on excellence, respect, and responsibility.

Quality

We believe that the quality of teaching is the heart of our educational mission. We are committed to offering an excellent educational experience, based on innovative and relevant teaching methods that address the challenges of the present and the future. Every student deserves a path that values their talent and nurtures their potential. We support the dreams and aspirations of everyone, creating opportunities for learning, research, and personal and professional growth. We want our Schools to be a place where talent not only emerges but is nurtured and transformed into concrete skills and positive impacts.

Responsibility

We believe in responsibility as the foundation of every action, decision, and behavior. Every individual within our community is called to be accountable for their choices and to contribute to the collective well-being. We are committed to promoting an environment based on mutual respect, where every person is treated with dignity and consideration, regardless of their role. We believe that respect is key to building authentic relationships and fostering collaboration grounded in trust and solidarity.

Inclusivity

The true strength of a community lies in its ability to value differences. We are committed to ensuring equal opportunities for all, regardless of ethnicity, gender, religion, sexual orientation, disability, or other personal characteristics. We recognize and celebrate diversity as an enrichment and work to break down every barrier that hinders participation and success. We ensure that every individual feels welcomed, represented, and free to express their potential, contributing to a community that grows through the richness of its differences.

Honesty

Integrity and honesty are the foundation of every action and decision we make. We are committed to ensuring that everything we do is transparent, fair, and sincere, adhering to the ethical and academic standards that form our foundation. Every member of our community contributes to building a strong and reliable collective identity that represents our vision and values in the world.

Sustainability

We believe that innovation is the key to addressing global challenges and maintaining our role as leaders in academic and professional fields. We promote a dynamic approach that encourages research, creativity, and adaptation to change, fostering critical and transformative thinking. We recognize that progress must be accompanied by a strong sense of responsibility toward the environment and society, which is why we are committed to developing sustainable practices and promoting collective efforts that ensure a prosperous future for the next generations, balancing growth with respect for natural and social resources.

BEHAVIORAL PRINCIPLES

Equal opportunities and non-discrimination

We are committed to ensuring **equal opportunities** by promoting an **inclusive** environment where every individual, regardless of their personal characteristics, can live, work, and learn in a context based on mutual respect, equity, and the appreciation of diversity. We believe that only in a fair and respectful environment can talent, collaboration, and innovation thrive.

We firmly **reject any form of discrimination or prejudice**, both in internal relationships and in dealings with external parties interacting with the Schools. Every decision we make – from admissions to growth opportunities – is based on clear and transparent criteria, ensuring that every member of the community can fully express their potential.

WHAT WE EXPECT FROM THE INTERNAL COMMUNITY

The students

- Treat everyone with respect, without distinction or prejudice, actively contributing to creating a welcoming and inclusive environment.
- Adopt an open and collaborative attitude in group activities, social interactions, and academic life, promoting the participation of all.
- Foster dialogue and constructive discussion, recognizing and valuing diverse perspectives.
- Report any incidents of discrimination or exclusion promptly, whether experienced personally or observed.

The faculty

- Ensure fair and impartial treatment for all students, avoiding any form of discrimination or prejudice in evaluations, teaching activities, or personal interactions.
- Create a stimulating learning environment that offers every student equal opportunity to participate, express themselves, and reach their potential, without exclusion or disadvantage based on their identity or personal condition.
- Integrate cultural and personal diversity as an educational value, fostering dialogue and empathy among students and encouraging respect for others' perspectives.
- Be role models for inclusiveness, promoting respectful behaviors and helping raise awareness among students about the value of diversity.

The staff

- Ensure respectful and impartial treatment for all members of the community, working to build a work and study environment based on trust and inclusion.
- Promote equal opportunities in every professional activity, ensuring that everyone has equitable access to resources, growth opportunities, and responsibilities, eliminating any form of discrimination.
- Demonstrate leadership in addressing and preventing all forms of discrimination or prejudice, adopting fair, transparent practices aligned with the values of equity and inclusion.
- Actively collaborate to raise awareness within the academic community on issues of equity and diversity, participating in initiatives and programs dedicated to these themes.

Focus on

Dialogue and constructive discussion are the foundation of a cohesive and inclusive academic community. We believe that listening to others' opinions, sharing ideas, and resolving conflicts through discussion are essential practices to promote respect, openness, and collaboration.

Every voice matter, and every discussion is an opportunity to grow and improve. This approach strengthens not only the sense of belonging but also excellence in academic and professional paths.

Combating harassment

We firmly **condemn** all forms of **harassment**, whether **physical**, **verbal**, or **psychological**, recognizing its discriminatory nature and the profound violation of human dignity. We reject any **aggressive**, **hostile**, **derogatory**, **persecutory**, or **oppressive behavior**, and we take concrete measures to prevent and address such situations, offering support to victims and intervening decisively against perpetrators.

We promote a **culture of consent** and **awareness in personal interactions**, recognizing that the perception of behaviors can vary depending on individual experiences and cultural contexts. In a multicultural environment, it is essential to be sensitive to differences and respect that actions considered acceptable in some cultures may be inappropriate or intrusive in others. Active listening, understanding, and respect for others' sensitivities are key elements in ensuring a peaceful and safe environment.

WHAT WE EXPECT FROM THE INTERNAL COMMUNITY

The students

- Respect the dignity and integrity of every individual, avoiding any behavior that could be perceived as offensive, intimidating, or harmful.
- Refrain from inappropriate behaviors, including unwanted sexual advances, offensive comments, or any actions that may cause discomfort or fear in others.
- Be aware of the importance of consent and intercultural sensitivity in interactions, avoiding gestures, physical contact, or expressions that may be perceived as intrusive or inappropriate.
- Report any incidents of harassment promptly, whether experienced or observed, using the protected reporting procedures provided by the School.

The faculty

- Maintain professional and respectful behavior both in-person and online, avoiding any attitude that could be interpreted as harassment, intimidation, or discrimination, both inside and outside the school premises.
- Establish relationships with students that, while cordial, always respect the boundaries of the teacher/student relationship, focusing exclusively on educational and professional matters.
- Actively listen and offer support to anyone reporting harassment, directing them to the available reporting channels and support resources.

The staff

- Treat all members of the academic community with respect and professionalism, ensuring an inclusive work environment free from intimidating or inappropriate behaviors.
- Promote a culture based on respect and awareness of others, ensuring that all anti-harassment policies are understood, respected, and enforced.
- Manage reports in a timely and confidential manner, providing guidance and assistance to anyone in need, ensuring protection and proper resolution of reported issues.

Focus on

Harassment includes any unwanted behavior that, for the person on the receiving end, is perceived as harmful, intimidating, or degrading. It can manifest through verbal, physical, or visual actions and expressions that are defamatory, offensive, or intrusive, especially when referring to an individual's personal characteristics, such as sex, ethnicity, nationality, religion, political affiliation, mental or physical differences, sexual orientation, health status, age, or any other identifying feature.

Harassment can take different forms and have significant impacts on the dignity of the individual and the study or work environment. **Moral harassment** includes repeated and systematic behaviors aimed at undermining a person's dignity, safety, and self-esteem, creating a hostile, humiliating, or offensive environment. It may manifest through social exclusion, systematic devaluation of the person or their work, intimidation, undue pressure, derogatory attitudes, or other forms of psychological abuse that generate prolonged discomfort for the victim. **Sexual harassment**, on the other hand, includes any unwanted sexual behavior that causes discomfort or compromises the freedom and safety of the person experiencing it. These behaviors can consist of unsolicited verbal or written advances, offers of work or academic advantages in exchange for sexual favors, persistent propositions for dates or unwelcome physical contact, as well as retaliation or threats against those who reject advances or report inappropriate behaviors. Sexual harassment also includes explicit comments, innuendo, winks, or sexually suggestive jokes, as well as the distribution of sexual or defamatory images, videos, or texts.

The severity of these acts is heightened when there is an asymmetry or hierarchical subordination between the perpetrator and the victim, particularly when such behaviors affect the person's working, studying, or career conditions.

Impartiality and recognition of merit

We place the principles of **transparency**, **impartiality**, and **meritocracy** at the core of our actions, recognizing that individual merit is the foundation of every academic, professional, and organizational decision. We are committed to ensuring that every decision-making process is clear and understandable, providing students, faculty, and staff with the certainty that the criteria adopted are fair and transparent.

We firmly reject any form of **nepotism** or **favoritism**, which undermines the integrity and fairness of our community. Through the recognition of merit, we strengthen mutual trust, promote excellence, and value the unique contribution of each member of our community.

WHAT WE EXPECT FROM THE INTERNAL COMMUNITY

The students

- Recognize and support the achievements of peers based on effort and results, without resorting to favoritism or improper behavior.
- Demonstrate dedication and seriousness in academic activities, knowing that opportunities and recognition are based on merit and the quality of work.
- Collaborate honestly and responsibly in group projects, contributing fairly and respecting established rules.

The faculty

- Ensure that all academic evaluations, such as assessments, exams, feedback, and assignment of opportunities, are based solely on merit, without external influences or bias.
- Ensure that student evaluation is done with transparency and impartiality, considering the students' results and abilities, and, when necessary, support the judgment with advice, suggestions, and constructive criticism.
- Promote academic excellence and encourage students to continually improve, recognizing and valuing their efforts and successes fairly.

The staff

- Ensure that every organizational or administrative decision is made transparently and communicated clearly, avoiding any form of ambiguity that might undermine the community's trust.
- Reject any form of abuse of position, ensuring that one’s role is not used to interfere with tasks assigned to others or to grant unjustified advantages.

Focus on

Nepotism occurs when a member of the school community uses their position to grant benefits or facilitate the undue assignment of tasks in favor of spouses, partners, relatives, or in-laws up to the fourth degree, or other individuals with whom they have personal ties.

Nepotism also includes undue influence over recruitment or selection procedures aimed at achieving benefits or advantages, including external funding or access to employment.

It also **encompasses favoritism practices**, which consist of the arbitrary allocation of opportunities to students or subordinates, in contrast with the principle of meritocracy and detrimental to the prestige of the School.

Respect for roles and the institution

We promote an academic environment based on **mutual respect and the appreciation of roles** within the academic community. Every member is called upon to preserve and strengthen the values and integrity of the institution, supporting its educational, cultural, and social mission. The success of our community relies on a shared commitment to adhering to regulations, valuing individual responsibilities, and actively contributing to the reputation and prestige of the School.

Respect for roles and hierarchies is essential to foster active and constructive collaboration. This requires **transparent dialogue, mutual listening, and trust**, so that collaboration between students, faculty, and staff can create an inclusive academic environment focused on excellence. Every individual is encouraged to recognize and respect others' roles and responsibilities, contributing with competence and commitment to the smooth functioning of the institution and achieving its mission.

To ensure fairness and professionalism, the Group **prohibits romantic relationships** between students and faculty or administrative staff, as such relationships may generate conflicts of interest, compromise impartiality, and undermine trust in the academic community. We firmly uphold the principles of fairness and impartiality in interpersonal relationships, safeguarding the professionalism and integrity of educational and work dynamics.

WHAT WE EXPECT FROM THE INTERNAL COMMUNITY

The students

- Respect the rules, policies, and the educational mission of the School, participating correctly and transparently in academic activities.
- Interact with faculty and staff in a respectful manner, recognizing their respective roles and responsibilities and valuing the diversity of perspectives within the academic community.
- Understand and respect academic hierarchies, adopting a critical yet constructive approach that fosters dialogue and collective improvement.

The faculty

- Be examples of professionalism and leadership, promoting an educational environment based on trust, collaboration, and mutual respect.
- Maintain professional interactions with students, avoiding behaviors that may be perceived as inappropriate or conflicting with the values of the School.
- Refrain from romantic or personal relationships with students, preserving the integrity of educational dynamics and ensuring fairness and impartiality.
- Know and respect the School's internal regulations, consulting with the Academic Offices for official responses, avoiding direct agreements with students on regulatory matters to promote transparency and cohesion within the institution.
- Actively and constructively collaborate with colleagues and staff, contributing to the success of the institution and the well-being of the academic community.

The staff

- Act with respect and professionalism, supporting faculty, students, and colleagues in achieving the School's objectives.
- Ensure that administrative activities are conducted in accordance with institutional policies, contributing to the creation of an inclusive, harmonious, and collaborative work environment.
- Refrain from romantic or personal relationships with students, maintaining behavior that respects assigned roles and responsibilities, safeguarding professionalism, and integrity.

Professionalism and commitment

We recognize **professionalism and commitment** as fundamental elements for the success of the academic and working community. Every member is called to operate with **competence, transparency, and responsibility**, contributing with integrity to educational and organizational processes. We believe that only through constant dedication and a culture of merit can we build a dynamic, innovative environment focused on excellence. We expect students, faculty, and staff to approach their activities with seriousness and dedication, respecting roles and responsibilities.

Everyone has the duty not only to pursue their own goals but also to contribute to the collective well-being, collaborating constructively and fostering mutual growth. Professionalism and commitment are not only abstract values but also concrete tools for individual and collective growth.

WHAT WE EXPECT FROM THE INTERNAL COMMUNITY

The students

- Adopt professional behavior in all academic activities, respecting deadlines, regulations, and commitments with seriousness and reliability.
- Demonstrate proactivity in their studies, tackling challenges with commitment, dedication, and openness to continuous learning.
- Respect the decisions and evaluations of exam committees and faculty, acknowledging their role and authority within the educational process.
- Take responsibility for their own learning, tackling each activity with determination to achieve quality results and foster personal development.

The faculty

- Be role models of professionalism, maintaining high standards of conduct, communication, and commitment in both teaching activities and relationships with students and colleagues.
- Provide active support to students, prepare lessons carefully, participate in the development of innovative methodologies, and promote a stimulating and inclusive learning environment.
- Invest in their own professional growth by participating in training and updating initiatives to improve teaching skills and methodologies.

The staff

- Operate professionally in managing administrative and organizational activities, respecting procedures and ensuring discretion in handling information.
- Provide quality service, demonstrate competence and dedication in supporting students, faculty, and colleagues, and contributing to the smooth functioning of the School.
- Demonstrate reliability and precision, completing assigned tasks with diligence and meeting expectations to support collective progress.

Focus on

We promote a healthy and safe work environment, in line with our educational mission. For this reason, **the use of alcohol is generally prohibited** during educational activities and within academic facilities, except for specific authorizations granted for institutional or celebratory occasions.

The use of **drugs is strictly prohibited** in any academic context and during events sponsored by the institution. Any inappropriate behavior attributable to the consumption of alcohol or substances will result in disciplinary measures, which may include immediate removal from the classroom or the venue where academic activities are taking place.

Freedom of expression, thought, and copyright

Freedom of expression and thought is an essential value for the intellectual, cultural, and social growth of the academic community. We promote an environment where every individual can freely express ideas, opinions, and beliefs, both through dialogue and creative or intellectual production. We believe that **open debate and creative freedom** are crucial to stimulating research, innovation, and critical thinking. However, freedom of expression must be exercised responsibly, respecting the dignity and rights of others and in compliance with current regulations[1]. This means avoiding statements or content that incite hatred, discrimination, or violence, as well as expressions that may offend the sensitivities of other members of the academic community.

At the same time, we firmly protect **copyright and intellectual property**, ensuring recognition of creative, scientific, and artistic work. Every member of the community has the duty to respect current regulations, avoid plagiarism, and ensure the proper use of others' works. The protection of intellectual property not only enhances academic work but also strengthens mutual trust and the integrity of scientific and artistic production.

WHAT WE EXPECT FROM THE INTERNAL COMMUNITY

The students

- Exercise freedom of expression and thought in a respectful and constructive manner, actively participating in academic and cultural discussions, valuing debate, and respecting the opinions and beliefs of others.
- Ensure that their creative and intellectual expression is not harmful to other members of the community, avoiding content that incites hatred, discrimination, or violence.
- Respect copyright and others' creative works, avoiding any form of plagiarism and using sources properly in their research and academic creations.
- Contribute to academic dialogue with original ideas and opinions, supporting the growth of the academic community and ensuring respect for the rights of every member.

The faculty

- Foster an academic environment where freedom of expression and critical thought are encouraged and valued, promoting the exchange of ideas and intellectual innovation.
- Ensure that every student can express their opinions in a climate of mutual respect, avoiding any form of censorship, marginalization, or intimidation.
- Educate students on the importance of copyright, raising awareness about the protection of intellectual property and the proper use of sources.
- Provide transparent feedback and evaluations, encouraging critical dialogue that respects the value of each student's contribution.

[1] For example, the Penal Code regarding defamation and incitement to hatred, laws on the protection of personal data (GDPR), the Code of Self-Regulation for Internet and Social Media, and copyright legislation (e.g., Law 633/1941 on copyright in Italy).

The staff

- Respect and support the right to freedom of expression and thought of all members of the academic community, contributing to creating an inclusive and respectful environment.
- Ensure respect for intellectual property rights, handling all academic and artistic works with the utmost care and in compliance with copyright laws.
- Promote the integrity of academic and artistic productions, responsibly managing the intellectual resources of the School and encouraging fair and informed use of works.

Focus on

Being part of the academic community means representing an institution based on values of excellence, integrity, and inclusivity. For this reason, every communication made in the name and on behalf of the institution must be authorized and carefully reflect the mission and principles of the School and the Group. We encourage all members of the community to actively contribute to promoting a **consistent and positive image** of the institution by adopting responsibility and awareness in public communications. Anyone wishing to express themselves officially as a representative of the School must obtain **prior authorization** to ensure consistency and respect for the entire community.

In personal communications, it is important to **distinguish one's opinions from those of the institution** and maintain a respectful and thoughtful approach, especially in digital contexts and on social media. Every public expression can have an impact on the institution and its reputation. Expressing oneself as a member of the academic community is a privilege that comes with responsibility. Acting with transparency and respect not only protects the image of the Group but strengthens its role as a model of excellence and integrity in the educational landscape.

Transparency and fairness

Transparency and fairness are fundamental principles for building an academic community based on trust, integrity, and justice. We believe that an open and accessible environment fosters a sense of belonging and enables each member of the community to clearly understand the decision-making processes that concern them. We are committed to **communicating clearly and honestly**, ensuring that decisions and criteria are public, understandable, and free from ambiguity. Every choice must be justified and based on principles of fairness, avoiding any form of favoritism, conflict of interest, or discrimination.

Fairness guides every decision and interaction within the School. It means always acting with integrity, respecting the rules, and treating every individual with equity and justice. It is our duty to avoid any form of conflict of interest, favoritism, or discrimination to ensure that every action and decision is grounded in fairness, impartiality, and justice.

WHAT WE EXPECT FROM THE INTERNAL COMMUNITY

The students

- Adopt transparent and honest behavior in academic activities, respecting rules and communicating clearly and correctly with faculty, peers, and staff.
- Be aware of your actions, actively engage in your educational journey, and understand the consequences of your choices.
- Maintain a fair and respectful attitude toward all members of the academic community, contributing to an equitable, inclusive, and collaborative environment.

The faculty

- Ensure transparency in teaching methods and evaluation criteria, making sure every decision is understandable, justified, and accessible to students.
- Act with seriousness and impartiality in assessments and feedback, basing decisions exclusively on merit and students' educational needs.
- Avoid favoritism or unfair treatment, promoting an educational environment that guarantees fairness, respect, and equal opportunities.

The staff

- Ensure transparency in administrative processes and communications, making sure information is easily accessible and understandable.
- Provide a professional and timely service, responding with integrity to requests and always upholding university standards.
- Manage resources and interpersonal relationships fairly, avoiding abuse of power and promoting a workplace based on fairness, respect, and mutual trust.

Confidentiality and protection of sensitive information

We are committed to ensuring the **confidential and secure handling of all sensitive information and personal data** related to students, faculty, staff, and any other individuals involved in academic and administrative activities. **Protecting privacy** and securely managing information are essential pillars for building an environment grounded in trust, respect, and safety. Our commitment is based on strict compliance with local and international regulations, such as the General Data Protection Regulation (GDPR), and on the adoption of high standards for data protection. Every member of the academic community is responsible for handling sensitive information with the utmost discretion and professionalism. It is essential that such information be protected from unauthorized access, disclosure, alteration, or destruction, using tools and methods appropriate for ensuring its security.**Sensitive information** must only be shared with authorized individuals or in cases of strict professional or academic necessity, always in accordance with the purposes for which it was collected. Any breach of confidentiality or security incident must be promptly reported to the designated officers so that timely corrective measures can be taken and risks to the community minimize.

WHAT WE EXPECT FROM THE INTERNAL COMMUNITY

The students

- Respect the privacy of every member of the academic community, refraining from disclosing personal or sensitive information regarding peers, faculty, or administrative staff.
- Use technology responsibly, adopting behaviors that ensure the security of the School's IT resources and the protection of academic and personal information to which they may have access.
- Understand and comply with data protection laws, being aware of their rights and responsibilities both in academic activities and in interactions with staff and peers.

The faculty

- Protect students' academic and personal data, ensuring the confidentiality of exams, grades, evaluations, and other sensitive information, and handling them only in appropriate academic contexts.
- Safeguard sensitive student-related information, ensuring it is treated with the utmost confidentiality and protected from unauthorized access.
- Maintain confidentiality in communications with students, addressing private or sensitive matters in secure environments that respect individual privacy.

The staff

- Handle administrative and personal information securely, treating sensitive data, such as assistance requests, payment details, or personal records, with discretion and in compliance with the School's security policies.
- Limit access to sensitive data, ensuring it is viewed only by authorized personnel and only when strictly necessary to perform their duties.
- Ensure confidentiality in internal communications, handling personal or sensitive information with care and sharing it only with authorized individuals, in accordance with current regulations.

Implementation mechanisms

The **Code of Conduct** is an essential reference for the entire academic community of the Plena Group Schools, guiding the behavior of students, faculty, and staff based on the values of **excellence, inclusivity, and integrity**. To ensure its **full adoption and application**, we have implemented clear mechanisms that promote awareness, adherence, and compliance with the principles outlined in the Code. The Code is always accessible through each School's digital platforms and in printed form at the Secretariat and Management offices. Upon enrollment or hiring, every new member of the community receives and signs the Code, formally committing to upholding its principles and to contribute to the creation of an environment grounded in respect, collaboration, and inclusion. The implementation of the Code is a shared responsibility among all members of the academic community. To strengthen awareness and adherence, each School organizes regular training programs for students, faculty, and administrative staff.

The Code of Conduct is not a static set of rules, but a living and evolving document, designed to respond to the needs of the academic community and to the challenges of a changing world. The active and conscious participation of each member is essential to ensure its effectiveness and relevance, thereby reinforcing the Group's role as a virtuous example of excellence, integrity, and inclusivity, in service of both individual and collective growth.

Reporting channels

We invite all members of the academic community to **promptly report** any behavior or situation that could compromise the integrity or well-being of the community or conflict with the principles of the Code. Reports can be submitted through the designated channels (whistleblowing) provided by each School, which also allow for anonymous submissions. Every report will be handled with the **utmost attention and confidentiality** by the designated **reporting channel** officer, who will ensure a fair and impartial process. If necessary, the findings of any investigations will be shared with the parties involved and may result in corrective or disciplinary measures.

We are committed to protecting those who make a report in good faith. **Retaliation**, discrimination, or penalties against individuals who report misconduct or cooperate with an investigation **will not be tolerated**. Any retaliatory act will be considered a serious violation of the Code and may result in appropriate disciplinary action. If in **doubt** about how to proceed, members of the community may contact the Academic Office or Management, who are available to provide guidance and support. All reports will be handled with full respect for the dignity and rights of all parties involved, reinforcing an environment based on trust and shared responsibility.

Disciplinary system

Failure to comply with the Code constitutes a **violation** and is considered a serious **breach of the contractual obligations** of employees, students, and faculty. Therefore, non-compliance with the principles of the Code may result, depending on the circumstances, in disciplinary actions and/or sanctions or termination of the relationship with the School, including expulsion of the student or termination of employment for faculty and staff.

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