

Contents

CHAPTER I SCOPE AND PRINCIPLES 2

 Article 1 Scope 2

 Article 2 General Principles..... 3

 Article 3 Legality 3

 Article 4 Non-Discrimination..... 3

 Article 5 Impartiality and Independence 4

 Article 6 Diligence and Efficiency 4

 Article 7 Confidentiality 5

 Article 8 Environmental Protection 5

CHAPTER II ADMINISTRATION OF FEAL 5

 Article 9 Administration 5

 Article 10 Transparency 5

CHAPTER III CONFLICTS OF INTEREST AND INCOMPATIBILITIES 6

 Article 11 Conflicts of interest 6

 Article 12 Incompatibilities 6

CHAPTER IV EXTERNAL RELATIONS AND REPRESENTATIONS..... 6

 Article 13 Relationships with Third Parties 6

 Article 14 Relations with Other Institutions 7

 Article 15 Relationships with the Media..... 7

CHAPTER V PROTECTION OF DATA, DOCUMENTATION AND PROCEDURES..... 7

 Article 16 Protection of Data 7

 Article 17 Requests for Access of Documents 8

 Article 18 Requests and Procedures..... 8

 Article 19 Preservation of Records..... 8

CHAPTER VI INTERNAL AFFAIRS 8

Article 20 Relationships among Employees 8

Article 21 Use of the Foundation Resources 9

CHAPTER VII DISCLOSURE AND APPLICATION OF THE CODE..... 9

Article 22 Disclosure of the Code..... 9

Article 23 Effective as Of10

CHAPTER I SCOPE AND PRINCIPLES

Article 1 Scope

1. This Code applies to all employees of FEAL, defined as all the people who play professional roles and members of governing bodies, within the limits of the respective agreements, mandates and applicable law.
2. This Code includes a set of general rules and principles of ethics and professional conduct, applicable to all employees of FEAL, in internal and external relationships, constituting a reference as to the standard of conduct required by FEAL.
3. The present Code shall apply to all employees of FEAL at their usual location of work, or in a place where they are working to represent the school, as well as when traveling abroad under professional duties or performing jobs assigned to them.
4. The rules and principles of this Code of conduct do not preclude nor waive the application of other rules of conduct or ethics of any kind, also applicable, which are subsidiary and complementary to the provisions of the internal legal regulation regarding relationships between FEAL and its employees.

Article 2 General Principles

1. In the exercise of their official duties, the employees should guide their actions by loyalty to FEAL and respect the principles of legality, good faith, responsibility, independence, transparency, integrity and confidentiality, consistent with the mission and objectives of FEAL and policies set out by it.
2. The behavior of the employees should aim to maintain and strengthen the trust of the community in the Foundation, so as to contribute to and give evidence of a posture of accuracy, reliability and excellence.

Article 3 Legality

1. FEAL must respect and ensure strict compliance with the rules contained in its statutes and in all legal and statutory requirements applicable to its activities, as well as with internal policies approved by the Board.
2. In carrying out their professional duties, employees must act in accordance with the general law and other specific applicable laws, ensuring, in particular, that any decisions which affect the rights of recipients, have fundament and legal justification.

Article 4 Non-Discrimination

1. While treating requests from third parties, following processes and making decisions, employees should be guided by the principle of equal treatment.
2. Employees may not adopt unjustified discriminatory behavior towards other employees or third parties, namely those based on race, gender, gender identify, religion, political affiliation , disability, age, social origin, wealth or sexual orientation.

3. Due to the specific characteristics and objectives of FEAL in the field of education, it is not considered unjustified discrimination, to give priority in the admission of North American students, students of other English-speaking countries, immigrants, or students arising from other systems of English-teaching or not admitting students whose special needs FEAL conscientiously feels not having the capacity or means to attend.

Article 5 Impartiality and Independence

Employees should make decisions and adopt behaviors guided by the principles of independence and impartiality, acting with objectivity and fairness, without taking advantage for him/herself or from an illegitimate interest of a third party, complying with the rules established by the Board. The employees of FEAL are unable to receive or accept from a source external to FEAL, whether for themselves or for their family members, any benefits, rewards or gifts that exceed a nominal value in regards to the activity they perform in FEAL.

Article 6 Diligence and Efficiency

1. Employees must comply with zeal, efficiency and, in the best possible way, the professional roles and respective duties assigned to them and be coherent in their behavior with the decisions of the Board.

2. Regarding the relationship with third parties, employees must demonstrate availability, efficiency, politeness and courtesy.

3. If an error occurs which unreasonably harms the rights of third parties, employees should immediately report the matter to their hierarchical superiors, promptly complying with the given instructions in order to fix the effects of such an error.

Article 7 Confidentiality

Employees may not assign, disclose, use or refer, directly or indirectly, any information relating to the activity of FEAL or the performance of their official duties, whenever such information is confidential or considered as such by the Board.

Article 8 Environmental Protection

Employees shall adopt and promote the best practices in environmental protection, in particular by promoting an eco-efficient management, in order to minimize the environmental impact of their activities, as well as adopting a responsible use of the resources.

CHAPTER II ADMINISTRATION OF FEAL

Article 9 Administration

1. According to the statutes of FEAL, it is up to the Board of Directors to manage the activity of the Foundation. The management of it may be delegated to an executive committee.
2. This Code also requires members of the Board to show impartiality and ethics resulting from their positions of responsibility, not being subject to special and additional rules of conduct.

Article 10 Transparency

1. FEAL operates in a transparent way and adopts management practices and accounts services, in order to complement the legal obligations in this area with additional measures deemed appropriate.

2. FEAL offers on its website, the institutional information under the law provided in Article 9 of the Foundation Laws of Portugal as well as information relating to its activities, which might be of general interest.

CHAPTER III CONFLICTS OF INTEREST AND INCOMPATIBILITIES

Article 11 Conflicts of interest

1. Employees shall avoid any situation liable to cause, direct or indirectly, conflicts of interest, and refrain from participating in decision-making which may involve them.
2. Conflicts of actual or potential interests exist whenever an employee has a personal interest, direct or indirectly, in a specific area which could influence or appear to influence, the impartial and objective performance of his/her duties.
3. Situations of conflicts of interest must follow the rules established by the Board and be immediately communicated by the employee.

Article 12 Incompatibilities

No employee may engage in any professional activity to an entity outside of the Foundation, whose corporate purposes or activities may conflict or harm the interests and activities of FEAL or its good name, or if this exercise interferes with the performance of his/her duties.

CHAPTER IV EXTERNAL RELATIONS AND REPRESENTATIONS

Article 13 Relationships with Third Parties

1. Employees should perform their activities with full respect towards the objectives of FEAL, not favoring interests of third parties which may harm the Foundation and refusing any personal benefit or privilege.

2. Employees should also act in a way to allow that commitments to suppliers of products or services are honored and to require from them full compliance with their obligations.
3. The choice of suppliers should be based on impartial and transparent criteria and any situation of exclusivity or of control should be specifically justified.

Article 14 Relations with Other Institutions

Contacts with representatives of other institutions, public or private, should always reflect the policy and specific purposes of FEAL, and the employees should guide their relationships by criteria of quality, integrity, accuracy and transparency.

Article 15 Relationships with the Media

1. FEAL relates to the media with integrity, strictly to the extent necessary for the defense and promotion of its aims and activities, always without prejudice to the confidentiality owed to its employees and students.
2. Any contact with the media must have prior approval of the Director who will ensure that the Board of Trustees is kept informed as necessary.

CHAPTER V PROTECTION OF DATA, DOCUMENTATION AND PROCEDURES

Article 16 Protection of Data

1. Employees who work with or have access to personal data relating to individual citizens, must respect the norms of privacy and the integrity of the person, according to the law.
2. Employees may not use any personal data to which they have access to their own benefit, illicit purposes or transmit such data to unauthorized persons.

Article 17 Requests for Access of Documents

Requests for access to FEAL documents shall be handled according to the guidelines internally established.

Article 18 Requests and Procedures

1. Decisions on requests made to FEAL must be taken within a reasonable amount of time.
2. Whenever a request cannot be decided within a reasonable amount of time due to its complexity, the employee will be notified accordingly.

Article 19 Preservation of Records

The administrative services of FEAL keep adequate records of incoming and outgoing mail, of documents received and actions taken, as well as of other relevant information according to the internal filing policy system.

CHAPTER VI INTERNAL AFFAIRS

Article 20 Relationships among Employees

1. Regarding inter-relationships, the employees shall observe the principle of loyalty, applicable not only to the performance of professional duties assigned to them, but also to compliance with the instructions of superiors and respect for proper hierarchical channels.
2. Employees shall contribute to the creation and maintenance of a healthy, cohesive and friendly work environment, based on team spirit, in achieving the objectives and mission of FEAL.
3. FEAL strives to create and maintain a work environment in which people are treated with dignity, decency and respect and which is characterized by mutual trust and the absence of intimidation, oppression and exploitation.

4. Harassment in any form by any individual toward another is unacceptable and is defined as any behavior (word, attitude) that is unwanted, practiced with some degree of reiteration and that is intended to affect a person's physical and/or psychological integrity or to create an intimidating, hostile, humiliating or destabilizing environment. Harassment is a process in which there is an illicit or, at the very least, ethically reprehensible objective and not an isolated act. Harassment in the workplace could be either sexual or moral in nature.

5. Employees should seek to enhance and update their knowledge in order to maintain or improve their professional skills.

Article 21 Use of the Foundation Resources

1. Employees should watch over the maintenance and protection of assets and resources which are part of FEAL's heritage, neither using them abusively or inappropriately, nor allowing such use by third parties.

2. In the exercise of their professional activity, employees should promote an efficient use of the available resources.

CHAPTER VII DISCLOSURE AND APPLICATION OF THE CODE

Article 22 Disclosure of the Code

1. FEAL will have this Code available on its website.

2. With regards to the compliance of the provisions of this Code, employees should ask their respective hierarchical superiors, for guidelines deemed necessary, as well as for clarification of any doubts.

3. During the process of admitting employees, they will be advised of the existence of this Code.

Article 23 Effective as Of

This Code becomes effective on the following day after its approval by the Board of FEAL.

Approved: August 26, 2014
Revised: January 27, 2022