




Code of Ethics & Conduct

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APPROVALS

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Preamble

At the heart of the Escola, and as distinctive elements of our project, lie our values: **Imaginatio** (creativity), **Dialogus** (dialogue and collaboration), **Libertas** (self-determination), **Opus** (individual and collective effort), **Fides** (commitment to people and the environment), and **Sapientia** (knowledge to be shared and acquired).

These values guide our mission in education, logistics, transport, intermodality, sustainability, digitalisation, and port operations across **the Mediterranean region and beyond**. Through the people who take part in our learning community, we aim for this ethical foundation to multiply its impact, extending to their professional environments and future roles.

We are committed to the highest ethical standards in all our actions, ensuring that education and collaboration are always grounded in what we call the “**ethical triangle**” - **respect, integrity, and responsibility**.

This Ethical Triangle is the framework through which the Escola’s core values are expressed and applied.

Values

Imaginatio – Creativity


Encourage the effort to design useful and sustainable solutions that improve both education and operations.

Dialogus – Dialogue and Collaboration

Foster trust through active listening and joint work between people and organisations.

Libertas – Self-Determination

Promote the ability to make well-founded decisions, take responsibility for outcomes, and stand up - respectfully and firmly - for what we believe is right.

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Opus – Collective Effort and Dedication

Embrace teamwork and a shared commitment to doing things well, together, with perseverance and a focus on continuous improvement.

Fides – Commitment to People and the Environment

Act with integrity, respect, and care towards others and the shared environment.

Sapientia – Shared Knowledge

Learn, teach, and share knowledge so that our community can move forward together.

1) Scope of Application


This Code applies to all individuals working for or collaborating with the **Escola Europea – Intermodal Transport**, including staff, instructors, participants, consultants, and external partners directly involved in our activities.

It defines the ethical standards expected of everyone representing the Escola in any capacity - particularly trainers and employees - whose actions reflect our institutional values.

Partner organisations are encouraged to promote similar principles within their own teams; however, this Code applies only to individuals acting directly on behalf of the Escola, under its coordination or in its representation.

2) Core Ethical Principles


- **Integrity** – Act with honesty, transparency, and fairness in all interactions, avoiding conflicts of interest.
- **Respect** – Treat all people, cultures, backgrounds, and perspectives with dignity and without discrimination.

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- **Sustainability and Responsibility** – Integrate environmental and social responsibility into port operations, logistics, and transport education, ensuring full compliance with applicable standards. The same will extend to all activities related to projects that the Escola is involved in.
- **Collaboration** – Value dialogue, knowledge exchange, commitment, and teamwork over competition for its own sake.
- **Innovation and Excellence** – Pursue creativity and continuous improvement while maintaining high professional standards.
- **Accountability** – Take proactive responsibility for one’s own actions, decisions, and their impacts on people, the environment, and the port-logistics ecosystems.

3) General Standards of Conduct

- Show diligence in knowing and complying with all applicable laws, regulations, and standards in education in the framework of port operations, logistics, transport, intermodal activities, and international trade.
- Never accept or engage in behaviour that could involve corruption, bribery, undue influence, favouritism, or conflicts of interest.
- Cooperate diligently with oversight bodies and support the early detection of misconduct that could endanger the integrity or reputation of the organisation.
- Promote equal opportunities and non-discrimination (in terms of gender, race, nationality, age, culture, disability, etc.).
- Protect confidentiality and personal or professional data in line with applicable legislation.
- Ensure accuracy and honesty in communications, reports, and promotional materials.
- Respect the environment by reducing our ecological footprint whenever possible and promoting carbon-conscious practices consistent with our educational and institutional goals, as well as the Sustainable Development Goals of the United Nations that apply to the Escola’s activities.

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4) Digital Ethics and Data Responsibility

In the context of digital transformation and the Escola's commitment to innovation, all members of our community - staff, trainers, participants, and partners - must ensure the ethical, responsible, and secure use of digital tools and technologies.

This applies to all educational, operational, and research activities involving the Escola's digital platforms, including but not limited to **Port Virtual Lab (PVL)**, **Port Virtual World (PVW)**, online learning environments, and data-based projects.

All those who are involved in this Code, agree to ensure:

- **Integrity in Digital Practices** – Use digital systems and simulation tools **honestly** and **transparently**, ensuring that data and results are never falsified, manipulated, or misrepresented.
- **Data Protection and Privacy** – Handle all personal, operational, or project-related data with the highest level of confidentiality and in full compliance with relevant regulations (e.g. GDPR).
- **Artificial Intelligence and Emerging Technologies** – Ensure that the use of AI, automation, or other advanced systems remains fair, unbiased, and subject to appropriate human oversight and ethical judgement - and where appropriate, is referenced.
- **Digital Communication and Behaviour** – Maintain professionalism and respect in all digital interactions - emails, social networks, forums, or internal channels - avoiding offensive, misleading, or discriminatory content.
- **Cybersecurity and Access** – Protect digital infrastructure through strong security practices, prevent unauthorised access, and promptly report any potential breaches.
- **Digital Inclusion and Accessibility** – Promote accessibility and inclusion across all digital education and communication activities, ensuring that technology expands learning opportunities for all.

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These principles reflect the Escola's conviction that digitalisation must serve people, learning, and sustainability - never replace ethical judgement or human collaboration.

5) Ethical Reporting (Whistleblowing)

Anyone who becomes aware of conduct that violates this Code should report it immediately directly to the designated **Ethics Officer** at ethics@escolaeuropea.eu, who will then report it to the management team of the Escola. Reports will be handled under principles of anonymity, confidentiality, and protection against retaliation.

The Escola guarantees **confidentiality**, **impartiality**, and **fairness** in the handling of reports. Whistleblowers are protected from retaliation in accordance with applicable laws. The Escola encourages responsible reporting - aimed at safeguarding our values, not at creating conflict or harm.


6) Oversight, Compliance and Consequences

The Escola will monitor compliance with this Code through internal reviews, feedback mechanisms, and regular evaluations of its educational, project, and operational activities.

An **Ethics Officer**, jointly appointed by the Director, Deputy Director General, and the Head of Administration, will serve as the point of reference for all matters related to ethics and conduct (see **Annex 1** for full definition and functions).

The Ethics Officer is responsible for promoting awareness of this Code, supervising its application, and recommending updates or improvements when necessary.

Procedure in Case of Non-Compliance

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If a potential violation of this Code is identified, it must be reported confidentially to the Ethics Officer, who will initiate a structured and impartial process consisting of the following stages:

- **Preliminary Review:** Verification of facts, collection of relevant information, and assessment of the seriousness of the incident.
- **Hearing:** The individual(s) involved will be invited to provide explanations or clarifications in a respectful and confidential manner.
- **Evaluation:** The Ethics Officer - together with the Escola's management, when appropriate - will assess the findings and determine corrective or disciplinary measures.

Possible Consequences


Depending on the severity of the breach, the Escola may apply one or more of the following measures, ensuring proportionality and fairness:

- Verbal or written warning;
- Mandatory participation in ethical or procedural training;
- Temporary suspension from activities, projects, or collaborations;
- Termination of collaboration or employment;
- Financial restitution or other corrective actions, where applicable and in accordance with relevant regulations.

All cases will be managed with confidentiality and respect for those involved. This process is primarily **corrective, not punitive**, aimed at preserving the integrity, trust, and ethical coherence of the Escola's community.

7) Review and Updates


This Code is a living document. The Escola will review and update it regularly - at least every two years - to reflect emerging ethical, digital, or environmental challenges.

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All stakeholders will be informed of any substantial updates and invited to reaffirm their commitment.

8) Acceptance

By enrolling in courses, collaborating in projects, or entering into employment or partnerships with the Escola, individuals confirm that they have read, understood, and agree to comply with this **Code of Ethics and Conduct**.

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Annex 1. Ethical Officer of the Escola Europea – Intermodal Transport


1. Definition and Purpose

The **Ethics Officer** is appointed by the Management of the Escola Europea – Intermodal Transport to ensure the proper implementation and observance of the Code of Ethics and Conduct. Their main mission is to promote integrity, responsibility, and respect across all activities of the Escola, ensuring that institutional values are consistently reflected in decision-making, project management, and professional relationships.

2. Main Functions

The Ethical Officer acts as a trusted advisor and point of contact for all individuals connected to the Escola - staff, collaborators, trainers, and participants - and performs the following functions:

- **Advisory and Guidance Role:** Provide support and advice when ethical dilemmas or doubts arise in the course of professional or educational activities.
- **Monitoring and Compliance:** Ensure respect for the principles of the Code of Ethics and promote their application across all areas of work.
- **Training and Awareness:** Facilitate educational sessions, awareness activities, and communication materials related to ethical culture and good practices.
- **Management of Ethical Communications or Alerts:** Receive and handle, in full confidentiality, any communications regarding potential breaches of the Code, ensuring protection for whistleblowers.
- **Review and Continuous Improvement:** Recommend updates or revisions of the Code of Ethics in light of new normative, digital, social, or environmental developments.

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- **Reporting to Management:** Annually submit a report to Management with relevant observations and recommendations.

3. Appointment and Independence

The Ethical Officer is appointed by the Director of the Escola, with the endorsement of the Deputy General Director and the Head of Administration. This role must be held by an individual with recognised professional integrity, moral credibility, analytical capacity, and impartial judgement, as well as a collaborative and empathetic attitude.

The Ethics Officer performs their duties with functional autonomy and independence of judgement and shall not receive instructions in matters concerning ethical oversight.


4. Term and Renewal

The appointment has a duration of **two years**. Renewal or termination may be decided by the Management of the Escola, with prior formal communication, ensuring continuity of service.

5. Contact Channel

The Ethical Officer maintains a dedicated communication channel for queries and reports through the email address: **ethics@escolaeuropea.eu**.

This channel guarantees confidentiality, anonymity if requested, and protection against any form of retaliation.

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6. Principles of Action

The Ethical Officer acts according to the following principles:

- **Confidentiality:** Preserve the identity and privacy of all parties involved.
- **Impartiality:** Act objectively and without bias.
- **Respect:** Treat all individuals with dignity and fairness.
- **Rigour and Transparency:** Base all actions on verifiable facts and sound criteria.
- **Educational and Preventive Approach:** Focus on guidance and improvement rather than sanctions.