



# COLEGIO COLOMBO BRITÁNICO

We Unite People and Cultures  
Through Education

## CODE OF ETHICS AND GOOD GOVERNANCE

Note: This translation was made to aid in comprehension and is not legally binding. The Spanish version is the one that is legally valid.

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The Board of Directors of the Colegio Colombo Británico Corporation, in use of the powers established in article 49, letter b of the bylaws.

**Considering:**

- a. That in its Ethos, the School expresses its commitment to form good human beings, favouring the emotional, social, moral conscience development, the strengthening of values and a positive behaviour.
- b. That the Board considers it useful to compile in a single document the guidelines and ethical principles that should regulate the behaviour of the members of the Educational Community.
- c. That in order to support this purpose, it is necessary to structure a set of self-regulation provisions for the authorities and directors of the School to observe in the exercise of their functions, and to constitute a guiding instrument for the fulfilment of the objectives, with In order to preserve ethical integrity, ensure the proper administration of organizational matters and public knowledge of management.
- d. That the Board of Directors considered it appropriate to publish a Code of Good Governance and entrusted the President with the responsibility for its drafting and approval, and the Rector for the socialization, dissemination and accompaniment in its application, throughout the Management System of the Corporación Colegio Colombo Británico.
- e. That it corresponds to the Rector to comply with and enforce the provisions of the Board of Directors in the previous paragraph.

**Decide:**

ARTICLE ONE. To approve the Code of Good Governance for the Colegio Colombo Británico Corporation, contained in the following text:

**Introduction**

The present Code applies to all actions of the authorities of the School and executives, both academic and administrative, and in general to all members of the educational community in order that their actions comply with the ethical and moral principles and practices of good corporate management.

The Code of Ethics and Good Government:

- Is broad and general by nature and does not intend to make more detailed and precise policies and procedures.
- Compiles a set of self-regulation provisions (basic principles and ethical values) that the members of the educational community must observe.
- Constitutes an invaluable guide, for the fulfilment of the objectives of the School, with the purpose of preserving and modelling the ethical integrity in:

- Relations with associates, work colleagues, suppliers, parents, students, professors, government entities and in general with all those with whom the School has some kind of relationship.
- Ensure the proper administration of their affairs.
- Public knowledge of management.

## CHAPTER I: STRATEGIC ORIENTATION OF THE SCHOOL

### 1. Orientation and Legal Nature

The Colegio Colombo Británico Corporation was created as a non-profit institution, with the purpose of guaranteeing for the new generations an integral education at the height of the best in the universal plane. (Article 4 CCB Statutes).

### 2. Mission and Vision

**Mission:** We prepare minds and hearts to face the challenges of the future.

**Vision:** To be a community whose members are recognized for transforming and positively impacting the environments in which they work.

### 3. Principles and Foundations

The College believes strongly in the defence of the highest standards of ethical behaviour and in the appropriation and demonstration of positive values as an essential element in the educational process of students. All members of the Educational Community (directors, parents, partners, employees, teachers, students and alumni) must apply the values of the Corporation in their actions: Honesty, Respect, Responsibility, Solidarity, Tolerance, Justice, Transparency and Equity, attributes of the IB Profile and institutional principles.

The School recognizes that any context that involves the meeting of the members of its community is an opportunity to demonstrate and develop adherence to these values.

**Explicit presentation and development of values:** The values must be presented explicitly to the students of the College of all ages by the teachers, together with the Section Chiefs and Program Coordinators.

**Implicit Development of Values:** The adults of the CCB Community must demonstrate through their attitudes and behaviour, the respect and adherence to the fundamental values of the CCB, the attributes of the IB Profile and the institutional principles.

**Practice in classrooms:** Teachers will ensure that their relationships with students, their teaching methodology and the activities carried out in the classes promote and develop the fundamental values of the CCB, the attributes of the IB Profile and the institutional principles.

**Student Activities:** Students should interact with each other in all contexts reflecting the fundamental values, attributes of the IB Profile and institutional principles.

Likewise, the members of the educational community must reflect the commitment with the principles of the School, which are:

1. Recognize and respect cultural, religious, ethnic, intellectual, and social diversity.
2. Develop moral, social and intellectual autonomy, as an integrated process through meaningful learning.
3. Generate the necessary conditions for students to reflect on the way they learn.
4. Stimulate research, critical and analytical thinking, and the development of creative capacity.
5. Offer different scenarios for the identification and development of talents in students.
6. Encourage healthy living habits and self-care as fundamental pillars of quality of life.
7. Work as a team with the family and the community, in the mission of training the student.
8. Commit to the preservation and care of ecosystems belonging to the environment.
9. Develop an awareness of the condition that unites us as human beings to identify social problems and act in favour of the solution, in a collaborative way.

## CHAPTER II: MANAGEMENT SYSTEM, SCHOOL GOVERNMENT AND PARTICIPATION COMMITTEES

The School is organized through processes and sub processes, which give rise to strategies and action plans. In addition, it configures action plans for compliance with the imperatives, objectives, standards and indicators, outlined in the strategic planning.

Educational services are offered in the Early Childhood, Primary and Baccalaureate sections.

### 1. SCHOOL GOVERNMENT

The School in development of the principle of educational autonomy enshrined in the Constitution and the Law, is governed by its own rules: General Statutes and the different institutional regulations, which clearly establish the levels of authority in the institution and allow the participation of teachers , parents, students, and alumni, through representation in collegiate bodies of school government and instances of participation, through which the interests and needs of the educational community are

channelled and decisions are made for the participatory construction of their project educational. In addition, it articulates the execution of its personal authorities with the decisions of collegial authorities, to promote accountability and the permanent review of their actions and processes.

The School Government corresponds to those people or collegiate bodies that have a decision level in the School and / or influence its operation and orientation.

### **Collegiate Organs:**

By collegiate body, we understand those instances of the school government or participation of the educational community that are composed of a plurality of persons, taking decisions democratically by consensus, unanimity or majority.

The members of the collegiate bodies have the obligation to act as a collective; the members thereof shall have no power or authority whatsoever when they decide to act individually, unless they have decided so in a meeting and a clear and complete record of said decision must be recorded in the corresponding minutes together with the powers of attorney. granted The spokesperson will be the President or, failing that, the Vice President of the governing body. Likewise, the members of the directive collegiate bodies are not individually responsible for any of the decisions taken by said collective body.

The collegiate bodies must have a composition that ensures a debate and objective and fair decisions for all the actors of the College; Additionally, they must not interfere in the administrative management of the School and must ensure the training of its members.

### **Governing Bodies:**

We understand by governing bodies those instances (natural persons or collegiate bodies) that have the power to make decisions.

The School Government of the CCB is constituted by the following organs:

**A. Board of Directors:** As a board elected every two years at the General Assembly of Shareholders in accordance with the bylaws of the Colegio Colombo Británico Corporation, and with the functions assigned there. The Board of Directors has various committees such as: Financial Committee, Legal Committee, Admissions Committee, Solidarity Committee, Development Committee, and others that the Board and the Rector deem necessary.

The functions are described in the statutes (article 49) and have been modified by the law who has attributed functions to other estates.

**B. The Directive Council,** as the governing body, of the participation of the educational community and of the academic and administrative orientation of the establishment, with the functions assigned in the Law and the School Handbook (Chapter 5). This is a collegiate body required by law for all educational establishments, with representation from the different sectors of the educational

community.

- C. **The Academic Council**, as the higher management body to participate in the educational orientation of the establishment, with the functions assigned in the Law and the Coexistence Manual (Chapter 5).
- D. **The Headmaster**, as representative of the establishment before the educational authorities and executor of the decisions of the school government.

The Headmaster is elected by the Board of Directors, and has the functions assigned in the Law and the School Manual (Chapter 5).

## 2. PARTICIPATION OF THE EDUCATIONAL COMMUNITY

- A. **Student Council (Primary and Secondary)**: The Student Council is the highest collegiate body of students that ensures the guarantee and the continuous exercise of participation by students and to serve as a good example and model in the exercise of positive leadership in school life. It provides the opportunity for students to participate in community projects.

The functions are described in the School Handbook (Chapter 6).

- B. **Prefects**: The position of Prefect is one of the highest dignities to which a student of the College can aspire. It is a leading position that has its origins in the British educational tradition. It is a recognition of academic excellence, leadership and the promotion of the values of the CCB. Prepares students to face the responsibilities of leadership and at the same time put them in a position to lead or be led by their peers.

The functions are described in the School Handbook (Chapter 6).

- C. **Parent Council**: The The Parent Council is a collegiate body of participation of the parents of the educational establishment aimed at ensuring their continued participation in the educational process and to raise the results of quality of service.

The functions are described in the School Handbook (Chapter 6).

- D. **Coexistence Committee**: It is a committee made up of representatives of the Educational Community. The functions are described in the School Handbook (Chapter 6).

- E. **Parent Association**: PTA, with the functions described in its bylaws.

- F. **Alumni Association**, with the functions described in its bylaws.

- G. **Employees Fund**, with the functions described in its bylaws.

## 3. RELATIONSHIP OF THE MANAGEMENT BODIES WITH THE PARENT ASSOCIATION (PTA), THE ALUMNI ASSOCIATION AND THE EMPLOYEE FUND

The collaboration between the College, the PTA, the Alumni Association, and the Employees Fund will be based on the premise that these entities will promote the principles, foundations and values that guide the College and help it to fulfil its educational mission.

The PTA, the Alumni Association and the Employees Fund will not be decision-making centres that affect the operation of the School. Such entities may propose and promote through their members or representatives' initiatives of an educational, financial and / or administrative nature that they consider important. These initiatives will be subject to the approval or disapproval of the Rector or the governing bodies, as appropriate.

The governing bodies or the Headmaster, as appropriate, will define the type and scope of the assistance that the School will provide to the PTA, the Alumni Association and the Employees Fund to facilitate the development of its social objects. The College will condition the authorization for these entities to provide services to the members of the community within the School's facilities, or in any other preferential way, to verify that the services are provided in a manner compatible with the objectives of the School, whether properly disclosed and provided according to goals or minimum levels of quality.

#### **4. BOARD OF DIRECTORS / HEADMASTER RELATIONS**

The members of the Board of Directors delegate to the Headmaster the management of the School in accordance with the policies established in the quality management system and in the Institutional Educational Project. The functions of the Headmaster are established in the School Handbook and the bylaws; The Board of Directors will set its objectives.

The members of the Board of Directors will limit themselves to defining the policies and objectives that will guide the School, and the Headmaster will administer the School to implement said policies.

The Headmaster will be responsible for the administration, development and implementation of their policies, making the decisions that may arise, and putting to work all the areas that make up the School to ensure its functioning in the service of the Institutional Educational Program (PEI).

The Headmaster is the executor of the policies determined by their governing bodies, is responsible for the management of the College in all its aspects and is obliged to keep the members of the governing bodies informed of the operation, (projects, achievements and problems) of the School.

The Headmaster must present a monthly report on school life to the members of the governing bodies that includes:

- Advances in its management.
- Project report and way to develop the management.
- Any administrative decision that the Headmaster considers must be previously approved by the governing bodies, which is not included among their functions.
- Any other administrative decision that the Headmaster considers should be presented to the members of the governing bodies.



The members of the collegiate bodies, the Headmaster and the staff of the School will respect the assigned functions and hierarchy according to the organization chart of the School.

## 5. DIRECTIVES PROFILE

The School's directives must possess personal, professional and analytical abilities, of synthesis, of decision and managerial capacity, strategic vision, objectivity and ability to present their point of view, proactive attitude, confidentiality, knowledge and commitment to financial sustainability and permanence of the School, which allows them to exercise an adequate performance of their functions. In this sense, they commit themselves to guide their actions in coherence with the mission and vision of the School, the philosophy of the International Baccalaureate programs and to comply fully with the current regulations, and the confidentiality of the information that requires it.

## CHAPTER III: GUIDELINES OF CONDUCT

1. The behaviour of employees, teachers, authorities and directors of the School must be oriented towards objective and transparent work, fully complying with their different responsibilities.
2. They will be properly informed and act in good faith, with due diligence and care, looking after the interests of the School and taking into account that loyalty to the Institution must always prevail.
3. Utilization and Use of Resources. Any person linked to the School undertakes to take care of the assets and assets of the School as their own, to use the assets and resources of the College, as well as to take advantage of the capabilities of human resources to fulfill the purposes for which they were intended, adopting the management of the resources of the School the criteria of rationality, austerity, transparency and accountability.

This point obliges the person to:

- A. Know and apply the regulations and the current policies regarding allocation and application of resources, as well as accountability.
  - B. Protect and preserve the assets of the College.
  - C. To carry out in its activities an optimum use of the assets and resources of the School for the benefit of the Colegio Colombo Británico community and to use them only for labor purposes, in a rational manner and with criteria of savings without distracting its use for matters beyond the School. This provision applies to laboratories, reagents, computer equipment, programs, use of software, communications equipment, Internet access and all those assets of the School that by reason of the performance of their work at a given time are under their responsibility.
  - D. To strive for the integral sustainability of the School by fulfilling commitments of economic responsibility with the care of its heritage and the efficient use of resources.
4. Decision making. All the decisions taken by a person linked to the School must be in accordance with the laws and other regulations that regulate their performance, as well as in accordance with the

values that the College preaches.

To do this, it must always act in accordance with criteria of fairness and equity for decision-making, without granting privileges, avoiding at all times to benefit or unduly harm another person or third parties. With the obligation to listen and analyze the diverse opinions and consider them when deciding.

5. The members of the educational community will take the necessary actions to protect and guarantee compliance with the policies of the School and inform the institutional control bodies about any procedure that violates the transparency of any of its activities, always prioritizing loyalty to the Institution.
6. The members of the educational community shall promptly inform the respective instances of any fact or irregularity on the part of another official, or third party, that affects or may harm the interests of the School.
7. Protect the institutional image, and preserve the institutional unity of the School.
8. Dignity: The members of the Educational Community must respect people in their human dignity, and lead an exemplary life as citizens.
9. The members of the educational community will establish relationships with the different interest groups based on transparency, trust, benefit and mutual development.
10. Non-Discrimination: The members of the Educational Community will not discriminate against anyone due to age, ethnic or racial origin, gender, sexual orientation or identity, marital status, political affiliation, religion, physical, social or cultural condition.
11. The sound criterion, the experience, the knowledge and the good faith, are elements that must sustain all act or determination of the School.

**12. Knowledge and Application of Laws, Rules and Procedures:**

The School will develop all its activities (educational, administrative and of any other nature), with strict observance of all applicable laws, and will try to make such commitment an example for the whole community.

The foregoing, without prejudice to exercising the resources and other rights granted by law, when the School considers that the corresponding authorities are applying the law unfairly or wrongly.

All members of the educational community of the Colegio Colombo Británico Corporation must act, and exercise their functions in accordance with the legal provisions, regulations, rules, procedures and other legal and administrative regulations that regulate the Corporation.

The members of the educational community will not participate by action or omission in acts considered to be incorrect or criminal, or that may be used to confuse or surprise the good faith of third parties, or used in a manner contrary to the public interest or the interests of the School.

The members of the Board of Directors and Board of Directors, employees and professors, will guarantee compliance with the laws in force, the bylaws and this Code, and will take into account the

considerations of the different interest groups related to the School.

- 13. Actions for Compliance:** The members of Collegiate Bodies and Directors of the School shall promote and disseminate, within the School, knowledge and compliance with the laws and regulations of the institution, as well as the rules of this Code of Good Governance.

The members of the educational community will seek to have a clear knowledge of all those rules and procedures, which regulate the position, or the position they hold and that give the possibility of exercising the rights, responsibilities and obligations as a member of the CCB Educational Community.

You must also know all the activities inherent to your position, or position and apply the knowledge with efficiency, effectiveness and diligence.

- 14. Copyright:** In developing its commitment to the observance of the law, the School will promote the respect of all members of the community for copyright and intellectual property in general. For this purpose, it will:

- Obtain user licenses for all computer programs (“software”) and other forms of intellectual property that you use.
- Take the necessary measures to prevent the installation of computer programs (software) and unlicensed files on the School’s equipment.
- Seek to facilitate access to legal “software” for all members of the community (through means such as information campaigns and the signing of special agreements with suppliers).
- Will not disseminate or use intellectual property works in unauthorized ways.
- Promote respect for intellectual property by all members of the community. It will take the necessary measures to avoid and sanction plagiarism and piracy on the part of teachers, students and administrative personnel, for which it adopts and disseminates the following:

- 15. Honesty Policy or Academic Probity.** As a School belonging to the International Baccalaureate Organization, we welcome the definition of honesty or academic probity of that organization (School Handbook Chapter 3.7).

## CHAPTER IV: PERFORMANCE COMMITMENT

Every person linked to the School is obliged to perform his functions with absolute responsibility, honesty, integrity and transparency. He/she is obliged to complete the work day punctually, ensuring that the activities inherent to the position are carried out efficiently and effectively.

He must also have respect for all members of the community, harmony in personal relationships and in the execution of his work, rendering his services in a careful and diligent way, maintaining good relations with all the members of the community within a framework of respect for human rights, the principles and values of the National Constitution and the values of the Corporation.

No member of the Educational Community may give or receive gifts or any other type of compensation that is given in exchange for the fulfillment or omission of the assigned functions, of the services rendered or to obtain advantages over a negotiation with suppliers and contractors. The benefits granted by the providers (Travel Agencies, Financial Entities, Insurers, Magazine Subscriptions, etc.) for the use of their services, such as miles, travel tickets, etc., will be for the exclusive benefit of the School.

## HEADMASTER'S EVALUATION

The Board of Directors will evaluate the Headmaster at least once each academic year. The evaluation will be based on objective criteria, based on the objectives set for the respective academic year. These criteria and objectives will be reflected in a document adopted by the Board of Directors within the first two months of the academic year, based on a proposal presented by the Headmaster.

The evaluation will be carried out through a methodology of recognized technical value, which takes into account, among other sources, (i) the opinion of the Headmaster (self-evaluation), (ii) the opinion of the members of the Board of Directors, and (iii) the opinion of a representative number of community members (students, parents, teachers and administrative staff) that is collected through means that guarantee their objectivity.

The results of the evaluation will be taken into account for the design of the work plan and evaluation criteria that will be applicable for the following academic year. Additionally, a management report of the Headmaster 's Office will be disclosed to the school community through the website or any other means deemed appropriate.

## CHAPTER V: CONTROL UNITS

The Quality Management System of the various processes of the School:

Directors, academics and administrative staff, operate within a management framework that aims at the quality of processes.

This system is based on internal referents, such as: The Statutes, the Coexistence Manual, the Institutional Educational Project, the institutional structures, the quality policy and the internal audit and control standards; and external referents or mechanisms of state regulation emanating from Law 115 of 1994 and the regulations of the Ministry of National Education.

The internal and external regulation should facilitate the critical review of the School, its history, the paradigms that support it and its articulation to society.

In the organizational context, the processes of institutional self-assessment and self-regulation are integrated within a global vision of management, which includes people, interactions, processes,

resources and results.

The School has the following units for evaluation and control:

**Statutory Auditor:** The Statutory Auditor fulfills the functions that statutorily and legally have been assigned.

**Internal Audit:** It is the process responsible for supporting the school in the supervision of the different activities, seeking a correct development of its corporate purpose, so that they comply with the rules, policies, processes and institutional procedures, and make recommendations to senior management for prevention. of risk, to protect resources and the efficient use of these, and the strengthening of their management.

## CHAPTER VI: GOOD GOVERNANCE POLICIES FOR INSTITUTIONAL MANAGEMENT

### 1. EDUCATIONAL SYSTEM POLICY

The College is regulated by constitutional and legal precepts, and those issued by the Ministry of National Education.

The Institutional Educational Project (PEI) is the most important internal reference in the progress of the institution and in the fulfillment of its historical mission. It is also a guiding guide for the being and the work of the school, an instrument of organizational self-regulation, and a letter of intention to achieve its goals.

### 2. HUMAN MANAGEMENT POLICIES

The school will include in its plans for training, welfare, and occupational safety and health, human management policies and practices that incorporate constitutional, legal and institutional principles, and transparency in the selection, induction, training, training, promotion and evaluation of the performance of its employees or contractors, taking into account professions, skills, abilities, aptitudes and suitability of these.

### 3. QUALITY POLICY

The Colegio Colombo Británico offers comprehensive, bilingual and multicultural education through:

1. The development of integrated national and international curricular programs that stimulate the search for excellence.
2. The application of strategies for the acquisition and strengthening of English as a second language.
3. The identification and stimulation of the talents of the students.

4. The formation in values.
5. The valuation of the Colombian culture and the identification with it.
6. The influence and experience of British culture.
7. The development of an international mentality and intercultural respect,
8. Through teamwork among the members of the educational community, for the fulfilment of the mission with which the institution is committed and the continuous improvement of its processes.
9. To strive for the protection of the environment.

The quality policy is based on institutional quality certification (ISO 9001-2008). Accreditation of the International Baccalaureate programs integrated in a quality assurance management system aimed at the continuous improvement of processes and the development of a culture of quality. The quality policy contemplates permanent self-evaluation, certification in order to achieve continuous improvement and permanent qualification of the education offered to its students and with the services it provides to the educational community.

For this purpose, the school supports the continuous development of human talent as well as revises and adjusts its quality management system in accordance with the needs and interests of the school community.

#### **4. COMMUNICATION POLICY**

The communication policy of the School assumes the communicational phenomena from a systemic and integral vision, which serves as support to the institutional processes and objectives and not simply from the computer-operative approach. The school assumes communication as a process of dialogue and cohesion; as a decision-making advisor and as a tool to train, educate and consolidate a solid organizational culture, flexible and harmonized with the transformations and needs of the environment.

The school will ensure that the information received and issued is true, complete and timely.

It is the duty of the Board of Directors and the Headmaster to prepare and present information on the real situation of the school and its performance in each academic or fiscal period, with the greatest transparency and in accordance with the academic, administrative and financial legal requirements and in accordance with established accounting standards, to report on:

- a. The objectives that the Headmaster has set for the period and / or the Strategic Plan.
- b. The opportunities and problems that correspond to the evolution of the activity of the school, including information related to the organization, the development of the same, the competitive environment, legal situations and administrative and academic institutional projects.
- c. The management of the main departments of the school in the academic, financial and control areas.

- d. The reports of the control bodies of the Internal Audit and the Statutory Auditor.
- e. Litigation in process or decided during the period.
- f. The end-of-year balance sheet, together with the financial reports and investment projects, which will include the description of the main risks related to the activity of the school.
- g. The management report and compliance with the objectives of each of the academic and administrative sections.

Only the President of the Board, the Headmaster, or whoever they designate are authorized to give information to the media.

The educational community must maintain clear communication channels. All members of the educational community are responsible for using the institutional channels when they have any concerns, and to respond in an agile and courteous manner. We must all contribute to improve communication, through effective listening.

#### **4.1. Regular Communication Channels:**

It is the responsibility of each of the governing bodies to ensure strict compliance with the regular communication channels established in the School Handbook Chapter 3.1.1.

#### **4.2. Media:**

The means of communication used are: written communications, the school website, social networks (Facebook, Twitter, You Tube, Instagram), emails, wikis, billboards, and verbal: calls and meetings.

The School, conscious of the care that we must have of our planet, has as a policy to privilege the electronic means of communication. See School Handbook Chapter 3.1.2.

It is important that we all contribute to strengthening the sense of belonging to our community.

The general written communications of the School to the members of the community will be:

- Clear, precise and concise. They will be written in simple, precise language and will avoid unnecessary tricks and idioms.
- Timely. They will be delivered with enough time to allow their recipients to be informed in time about the corresponding matter, and make decisions without pressures of last minute.
- Relevant. They will refer to matters of interest to the community, in the context of the School. They will avoid the promotion of commercial products and services, and the diffusion of political issues.
- Impeccable. They will not have grammatical and orthographic errors.
- Well directed: They will be directed and sent only to the corresponding target audience. For this

purpose, they will be sent in accordance with the “user profiles” in the school's systems, which must be kept permanently updated by the parents. The School will be responsible for the cancellation of the email accounts of any member of the community that leaves the School (the Head of the respective section reports to the systems department).

- Well delivered: As a general rule, they will be sent electronically, in a format that avoids congestion of the School's servers or those of the recipients. In the most urgent or important cases, the safest means will be chosen and measures will be taken to ensure that they have been received by their recipients.
- Open, honest and frank. They will not disguise reality through diffuse or confusing messages or the use of euphemisms. They will take into account and value the opinions of the community on the particular topic.
- In English and Spanish, as a general rule.
- Approved by the Head of the corresponding Section; and by the Headmaster of the School.

#### **4.3. Confidential Information**

Information of a specific nature, subject to reservation, or that which has not yet been made known to the public.

“Confidential Information” includes the information revealed by the CCB about educational services and programs, students, employees, members of the educational community, prices, fees, tuition values, costs, know-how, education strategies, processes and practices, development projects and data related to them, suppliers, personally identifiable information, and confidential and proprietary information that the CCB receives from third parties. These confidentiality obligations apply without limitation to written documents, information disclosed orally, information disclosed through visual observation and in electronic form.

In the development of any of the positions or participation in the collegiate bodies of the College, eventually you may have access to confidential information.

The School Handbook number 3.1.4 establishes: All members of the educational community have the right to privacy in their communications. This right is limited by the need to share information with those people that are necessary for the functions they perform in the institution. Teachers, psychologists, parents, students, administrators, share the duty of confidentiality. Members of the educational community must notify parents and heads of section or Rectory when they know of situations that may affect the health, safety, or cause harm to an individual. In these situations, community members must provide relevant information to education authorities and / or parents. When defining disciplinary or restorative processes, the School will not provide information to parents and students about consequences and sanctions applied to other members of the community.

All members of the educational community, and even more so those in positions of responsibility,



representation and trust, must maintain and tend for the due reserve and permanent protection of all work documents and information classified or considered confidential.

Who knows confidential information acquires the ethical and moral commitment not to reveal this information inside or outside the school, tacitly guaranteeing its custody. Consequently, all confidential information is stored inside the School.

Confidential information will not be provided to any person, member or not of the educational community, unless it is expressly authorized by the Headmaster, by the President of the Board of Directors or to meet certified requirements in writing of legal mandates.

**REQUIREMENT TO DISCLOSE CONFIDENTIAL INFORMATION:** If a member of the educational community requires disclosure of confidential information of the CCB by an order issued by a court or legally established authority, or by an administrative agency order, or any governmental entity, you must send a notification with sufficient anticipation to the CCB regarding said situation, in order that CCB has the opportunity to seek an order of protection or otherwise avoid or limit said disclosure.

Issues related to the activities of the School that are an essential part of its assets or endanger the survival or competitiveness of the CCB should not be discussed, with personnel outside of it, including friends and relatives, when through these comments the good name of the institution is harmed or knowledge and / or intellectual property of the institution is released.

The passwords or access codes of equipment must be confidential and will not be disclosed to third parties. These passwords must be changed with the frequency determined by the School. Personal computer systems should be protected with passwords that prevent unauthorized persons from accessing information.

Businesses and activities that involve confidential information, and that are carried out in the school premises or outside of these, shall be dealt with outside the scope of the personnel not involved in the operation.

**RESERVED INFORMATION:** In the development of the provision of services to the Corporation, employees and members of collegiate bodies may have knowledge of non-confidential information, which due to its sensitive nature are required to be stored and it is not possible to provide it to third parties unless expressly authorized. of the Rector. At this point it is important the responsibility of who knows the information and honesty for its management.

The members of the educational community undertake to use the Confidential Information revealed to it, exclusively for the exercise of their functions in accordance with their responsibility. They agree to: a) refrain from disclosing said Confidential Information to third parties without the express consent of the Headmaster or Chairman of the Board of the CCB. b) take the appropriate reasonable actions to preserve said confidence and confidentiality.

**PROTECTION AND RETURN:** The members of the Educational Community must treat and handle in all aspects the Confidential Information revealed to them, at least with the same care that they have with their own businesses, trade secrets, or Confidential Information and will have with them the Security measures that apply to your own business, trade secrets or Confidential Information. Upon the termination of the link with the CCB and / or within the term of thirty (30) calendar days from the date of the request by CCB, who has received confidential information, will return to CCB all the Confidential Information disclosed. to it, including but not limited to all copies or printed materials and information stored electronically.

**RIGHTS NOT TRANSFERRED.** The Confidential Information must remain at all times owned by CCB. No license or right is granted on any patent, trademark, copyright, trade secret or any other type of intellectual property right or property except the right to use Confidential Information in compliance with the Clauses of this Code and in exercise of assigned functions.

**4.4. NON-CONFIDENTIAL INFORMATION:** Confidential Information does not include information that is generally available to the public or becomes public knowledge, without there being a breach of the duty of confidentiality.

**RESPONSIBILITY:** The breach of the obligation of confidentiality will cause the corresponding legal sanctions, without prejudice to the obligation to indemnify the Corporation and the members of the educational community for the damages caused to them. In addition, the sanctions established in the School Handbook, Statutes, Internal Work Rules, Work Contract, if applicable, will apply.

**REMEDIATION:** The members of the educational community that have access to confidential information, agree that the Confidential Information revealed by CCB is of a special, unique and intellectual nature, and that its loss cannot be reasonably or adequately compensated by means of damages and damages or legal action.

Therefore, it is agreed that CCB will have the right to seek a sanction or sanctions, in order to avoid non-compliance with this Code and to specifically enforce the terms thereof before any Court that has jurisdiction, in addition to all other remedies. or legal actions to which CCB is entitled, or for reasons of equity.

**4.5. TRUTHFULNESS:** All members of the community share the duty to ensure the accuracy of all communications. See School Handbook Chapter 3.3.

## **5. COEXISTENCE POLICY**

The CCB is an institution that recognizes, respects and defends the dignity of all human beings and promotes policies, procedures and practices that oppose any type of discrimination based on age, ethnic or racial origin, gender, sexual orientation or identity, marital status, political affiliation, religion, physical, social or cultural condition.

The CCB is committed to providing a safe environment in which all members of the community, including students and their families, teachers, administrators and all school employees, interact with the highest standards of courtesy and respect. Everybody must observe good behaviour, use appropriate language and excellent standards of courtesy at all times, according to our core values: respect, honesty, solidarity, responsibility, tolerance and justice.

The School must be a space for meeting and friendship, a space for building the values of solidarity, cooperation, respect and dignity. See School Handbook Chapter 3.6.

## **6. ENVIRONMENTAL POLICY AND SUSTAINABLE DEVELOPMENT**

The School recognizes the importance of environmental education, for which it will develop and implement a school environmental project. As a result of the foregoing, each section Head will present his annual plan of activities to the Headmaster and the Academic Council for approval and follow-up. Once approved, the integral environmental school project and its results must be presented each academic year to the Board of Directors of the School Government.

The School makes explicit commitment to environmental management and seeks continuous improvement through permanent evaluation of its environmental impacts, prevention, control and mitigation thereof and compliance with applicable environmental legislation. All members of the educational community will be proactive in caring for the environment. The preservation and care of the ecosystems belonging to the school environment must be ensured and the recycling programs advanced in the School must be supported.

In addition to the comprehensive school environmental project, all members of the community will commit to:

- Inform about the need to take care of the environment. All are responsible for making good use and maintaining cleanliness in all the facilities and dependencies of the School.
- Reinforce the habits of care, hygiene and cleanliness of school facilities.
- Promote the reduction of unnecessary consumption and reuse. Promote the use of recycled materials within the departments.
- Encourage participation in national or international events that promote awareness of the environment.
- Contribute to the correct management of garbage: All members of the CCB Educational Community must contribute to the separation of waste at the source by using the garbage cans properly:
  - Green: Organic: If the plastic and paper objects are smeared with food, they should be placed in the organic container.
  - Blue: Plastic.
  - Gray: Paper.

## 7. RELATIONSHIPS

There must be a commitment to offer a quality, fair, cordial and equitable treatment, always complying with current regulations to the educational community and society in general.

Actions by any member of the community, should be addressed promptly and expeditiously to always respecting the established regular conduct. The obligation to provide timely and quality answers, when responding to requests for the provision of a service inherent to the position held, promoting actions, confidence in the community and society in general, respecting the manifestations of religious beliefs, policies, sexual, gender, age, special or intellectual abilities.

### A. Policy for interest groups

The interest groups correspond to all those persons or entities with whom the School has academic, social, commercial, financial, and service relationships, without prejudice to other groups that are identified within its function.

### B. Relations with students and employees

The institutional welfare is conceived, on the one hand, as a space for the construction of the educational environment and institutional life, tending to raise the quality of life of the educational community: students, teachers, parents and employees, and on the other, as a complement of academic and administrative actions.

In this double perspective, the School seeks to contribute to the integral formation, to the construction of the life project and to the development of the individual and group capacities of those who are part of the Institution, within a participative and pluralistic context. This is carried out by the institution through policies and strategies that allow the construction of a friendly, respectful, comfortable and safe environment.

### C. Relations with suppliers of goods and services

For the celebration of contracts in the Colegio Colombo Británico, the following requirements must be taken into account, in order to ensure transparency and clear, efficient and efficient management of the contract.

1. For the choice of the contractor, the experience and compliance in the execution of the contracts shall be taken into account, among other factors.
2. The people who participate in the contracting processes with the School will have the same rights and opportunities.
3. The selection of the most favorable proposal must be ensured, taking into account the offer of several contractors under equal conditions.
4. The employees of the School that intervene in the contractual process are obliged to monitor and control the correct execution of the contract, and to watch over the interests of the School.
5. The choice of the contractor will be made without taking into account factors of affection or

personal interest, or any subjective motivation.

6. Spouses or permanent companions or their relatives within the second degree of consanguinity, or second of affinity, or first civil employees, teachers, members of governing bodies or collegiate bodies, or companies in those that have participation, cannot contract with the School, unless prior authorization from the Ethics Committee.
7. As long as there are contracts in execution, another contract with the same contractor cannot be signed in order to guarantee compliance with each obligation; only a simultaneous contract will be possible, in cases where the conditions of the contractor are clearly favourable for the School, whether due to economies of scale, administrative or control facilities, or some reason that facilitates the execution of both contracts.
8. Natural or legal persons who have breached previous contracts with the School cannot be contracted with.
9. Transparency in the selection and contracting processes will be guaranteed.
10. There will be no business with natural or legal persons whose ethical, social and business behaviour is contrary to the laws, ethics and good customs or that are legally challenged.
11. The requests, claims and requirements must be addressed in a precise and timely manner.
12. Suppliers should be consulted in the database for the control of money laundering.

#### **D. Relations with the Community**

The School thinks about the social education as complement of the comprehensive education, as a foundation for the construction of the social responsibility of the students and a contribution to the development of the society. In this perspective, it generates training processes characterized by respect for life and dignity, for solidarity, for the search for social coexistence and the well-being of people.

In addition, it builds the identity and social meaning of students through research projects and social service, and promotes projection programs to the community.

#### **E. Relations with other educational institutions or entities**

We will promote respectful, cordial and collaborative relationships with other educational institutions avoiding that if on the part of officials, teachers, members of governing bodies and collegiate situations of Conflict of Interest.

#### **F. Conflicts of interest**

The School expects all members of the educational community to avoid any conflict between their personal interests and those of the School, in their relations with suppliers, clients, students, associates, governmental organizations and any other organization or individual that must interact with the School.

The members of the governing bodies and collegiate bodies must always behave in a completely impartial manner, without any bias other than the desire to defend the interests of the School.

Conflicts of interest is present in any situation in which a person faces their personal interests, direct or indirect, or their relatives or close friends with those of the College, in personal activities, or in dealing with third parties, whether suppliers, contractors, employees , students, relatives of students and employees or others, in such a way that the freedom and independence of the decision is affected or interfere with their duties and motivate an act in their performance, contrary to the correct fulfilment of their work obligations.

It will be considered that there is a conflict of interest when a member of any of the governing bodies or collegiate bodies is in a position to influence the adoption of a decision from which, directly or indirectly, an advantage for himself or his relatives may derive. within the fourth degree of consanguinity, second of affinity or first civil.

Businesses, financial activities or other interests, direct or indirect, that may create a conflict of interest with the Corporation or that jeopardize loyalty to the Corporation, are not allowed.

A person who is labor-related, through a contract for rendering services, or occupying a position in one of the governing bodies or collegiate bodies of the Corporation, cannot develop business with the Corporation in which he intends to profit personally or by intermediate of companies in which it has individual or family participation. This limitation includes all instances of the Colegio Colombo Británico Corporation community.

When a teacher or employee wants to exercise an employment relationship, to provide services or leadership to the community independently must request authorization to the Headmaster, who will authorize as long as there is no conflict with their current work and not put at risk the name from college.

In the case of the members of the Board of Directors, the members of the Directive Council, members of collegiate bodies (instances of participation) and persons occupying management positions of the Corporation, it will be clear that this Conflict of Interest policy must be of strict compliance and under no circumstances may be altered unless expressly approved by the Board of Directors or the Ethics Committee (in any case the body that analyzes the conflict may not have a member involved in the conflict).

#### **G. Declaration of Conflict of Interest:**

The members of the Educational Community must disclose their conflicts of interest or any situation that due to their particularities conflicts with the convenience of the School.

When a member of the Educational Community is in a conflict of interest situation:

1. He will inform his / her direct manager or the corresponding governing bodies or collegiate bodies as soon as possible.
2. The person confronted with a possible conflict of interest must make a complete and detailed presentation of the specific events, which may cause some damage to protect the interests of the Corporation. It must provide the pertinent and necessary information that leads to the

prevention and solution of such conflicts, that are presented or can be presented with any group related from the labour, commercial, administrative, academic or any other point of view with the School.

In a situation that could apparently generate a conflict of interest, it is advisable to provide prior information in order to make a comprehensive assessment of whether or not there is such a conflict.

3. Refrain from participating in the respective discussions, deliberations and voting. Your vote can not be taken into account to determine the quorum or the majority decision.

In case of doubt, the respective member will request the Direct Chief, governing body or collegiate body to determine if there is a situation of conflict of interests, for which he will provide the information that is relevant. Before deciding the substantive issue, the governing body will deliberate (without the participation of the respective member) and decide if there is a conflict of interests, and if it is positive, it will exclude the member from the discussions, deliberations and votes on the merits.

This same procedure and effect will be applied in cases in which the member of the governing body fails to declare the possible existence of the conflict of interest, and the latter becomes aware of it through other means.

This policy will also be applied, as relevant, to the members of the committees formed by the governing bodies and the administration of the School, and other instances of participation of the educational community. It will also apply to the employees of the School.

The directors and members of collegiate bodies will inform the Board of Directors and / or the Headmaster of the direct or indirect relationships that they maintain among themselves, or with suppliers, with clients or with any other interest group from which conflict situations could arise. of interest or influence in the direction of its management or vote.

No director may have a conflict of interest, be linked in any way with suppliers, competitors or customers who place him in a position to benefit individually by a decision taken in the performance of his duties and that affect or may affect the interests of the School.

No director may be a counterpart in litigation against the College.

The members of the educational community will act under absolute transparency, fairness and impartiality, without any type of preference or exception being presented to their benefit, even if the image and integrity of the School is not affected.

In the absence of express rules that regulate a particular subject or matter, nobody can act in such a way that decisions are made contrary to the interests of the School. Managers and members of the collegiate bodies must identify and ensure the resolution of conflicts of interest of the different levels of the School, for the appropriate use of assets and for transparency in transactions with stakeholders. If a situation arises that could generate a conflict of interest, it will be submitted for consideration and decision by the School Ethics Committee.

The deliberations and recommendations will be recorded in a written document.

### **Rules Concerning Conflicts of Interest:**

1. Legally requested and unprivileged information must be provided clearly.
2. No type of economic preference will be granted or received, which is outside the parameters of ethics and policies established by the School, for the different businesses that they carry out, whether for purchases, contracts, investments and any other type of commercial, labor, administrative and financial actions.
3. Proceed in a truthful, dignified, loyal and in good faith. Not to intervene in simulated acts or in fraudulent operations or in any other that tends to conceal, distort or manipulate the information of the School, to the detriment of the Institution, the interests of third parties or the State.
4. Avoid intervening directly or indirectly in improper arrangements in public institutions or bodies, in another entity or between individuals.
5. Avoid unjustifiably delaying the completion of the tasks proper to the position or those entrusted to it by their superiors, to the detriment of the School or the interest groups.
6. Failing to act by omission, or failure to provide information, with the purpose of protecting, favouring, harming or injuring a person or the educational community.
7. Inhibit to perform actions or business based on feelings of friendship or enmity on the part of those who have in their hands the ability to decide.
8. Refrain from deciding, participating or suggesting the decision, in actions or services in favour of people with whom they have private businesses.
9. Not accept gifts, excessive attention, concessions or preferential treatment from suppliers, students, parents, graduates or any other interest group that tend to receive reciprocal considerations of the same type, or influence decisions.
10. When a manager, employee, member of a chartered body and / or Legal Representative finds that in the exercise of his / her functions he / she may be faced with a conflict of interest, he / she shall inform the Ethics Committee or the Board of Directors immediately and abstain. in any case to participate in the discussion and decision of the matter that generates the situation of the mentioned conflict.
11. Avoid actions, relationships or decisions that are opposed, or even appear to be in opposition, to their duties as employees or to the interests of the School.
12. Refrain from misusing the intellectual property, facilities and other physical resources of the School (including supplies, office equipment, email and other computer applications).
13. Inform, as soon as he/she is aware, of the theft or inappropriate use of the property of the School.
14. Refrain from acquiring assets that are known (or should be known) are of interest to the School.



15. Refrain from owning shares, participation fees or any other type of economic interest in companies that provide goods and services to the School unless (i) said community member has expressly declared to the School that it owns such shares, fees of participation or interests, before the selection of the respective contractor; and (ii) the Ethics Committee expressly authorizes the hiring because it is subject to objective terms and conditions more favourable than those offered to the Association by other contractors.
16. Declare in writing the existence of assets, businesses or other financial interests that may generate a conflict of interests in the future, or the relationship of kinship with (i) students of the School, (ii) other employees of the School, (iii) persons who provide goods and services to the School, or with the owners, shareholders, employees or officials at the service of companies that provide goods and services to the School.

## CHAPTER VII: ADMINISTRATION OF THE CODE OF GOOD GOVERNANCE

The content of this Code is mandatory application and compliance. Any person related to the Corporation is responsible for compliance with this Code of Conduct, being able to make inquiries regarding its interpretation to the Rectory, the Heads of Department, Human Resources and the Ethics Committee. Equally before the knowledge of any type of infraction must bring it to the attention of the instances previously indicated. Any complaint must be investigated and whoever reports it may not suffer any kind of reprisal.

The Ethics Committee will be made up by:

- The Headmaster who will be the Chairman of the Committee.
- The President or Vice President of the Board of Directors.
- 1 member of the teaching staff chosen by the teachers.
- 1 student elected by the Student Council.
- The President of the Parent Council or his deputy.
- 1 representative of the administration chosen by the Administrative Director.
- The General Assistant who will act as secretary, without the right to vote.

The appointment as a member of the Ethics Committee will be made each school year, once the representatives to the Parent Council and Student Council are elected. Appointments will be disseminated to the entire community through the school's website.

### Functions:

1. Review the text of the Code of Ethics and Good Governance and propose modifications to the Board of Directors.

2. Disseminate the Code of Ethics.
3. Resolve inquiries regarding the interpretation of the Code of Ethics and Good Governance.
4. Verify and authorize, if appropriate, the hiring with members of the educational community, when conflicts of interest manifest themselves.
5. Resolve violations of the Code of Ethics.

The Ethics Committee will meet every 3 months in an ordinary manner, and when situations arise that require it. The Headmaster or the Chairman of the Board will be responsible for convening the Ethics Committee. The meetings will be recorded in Minutes that will be signed by the President and the Secretary. The Minutes will be filed in the Headmasters office.

**DISSEMINATION:** This code will be published on the school website in order to ensure that members of the educational community know it so that they can comply. All members of the Educational Community in turn are responsible for compliance with this code, and whoever has knowledge regarding the commission of a prohibited or illicit act must immediately inform the Ethics Committee.

In case of violation, the ETHICS COMMITTEE of the School will be responsible for conceptualizing and sending it to the corresponding instances in accordance with the regulations and rules of the School.

ARTICLE TWO. Validity. This Resolution governs from the date and repeals all provisions that are contrary.

Note: We have been inspired by some ideas contained in the Code of Ethics and Good Governance of the Pontificia Universidad Bolivariana, apart from the policy manual of Anglo Colombiano School and has been complemented with policies established in the Institutional Educational Project and the School Handbook of the CCB, and with contributions from members of the Educational Community. We thank everyone.

