



FIIAPP

COOPERACIÓN ESPAÑOLA



Code of Ethics

22 November 2024





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1. INTRODUCTION

We are a public-sector foundation that is part of the Spanish cooperation system. We work for public administrations, managing their participation in international cooperation programmes, thereby furthering their international projection and orienting it towards development results. We do this in more than 120 countries through exchanges of knowledge and experiences, mobilising public talent from public institutions.

We are positioned within the common global framework of the 2030 Agenda implementing policies in the countries with which we collaborate, as well as in the administrations participating in peer learning processes. This public technical cooperation is a systemic strand running through the SDGs and a driving force which promotes inclusive and sustainable public policies.

We promote spaces for dialogue and exchange that create alliances and relationships of trust, generating shared values between societies. This allows us to work on behalf of global public assets, committed to facing global challenges jointly and contributing to the global multilateral order.

Our framework for action

 <p>Cooperación Española</p>	 <p>GOBIERNO DE ESPAÑA</p>		
<p>FIIAPP is a foundation within the Spanish cooperation system that specialises in improving public systems through the exchange of public sector expertise between institutions.</p>	<p>We are a tool at the service of the international action and development cooperation priorities pursued by public administrations.</p>	<p>We are part of the European cooperation system, participating in defining priorities and implementing European projects.</p>	<p>We work directly towards two SDGs: 16 (strong institutions) and 17 (partnerships), which are the driving force behind the public policies contributing to the other objectives.</p>

We believe in the power public institutions and policies have to create a better world, because they are the beginning of sustainable change, reaching more people and for a longer time. We are committed to a series of principles and values that must guide our way of acting in order to promote ethical and responsible behaviour among the people who directly participate in fulfilling the Foundation's objectives.

The **objective** of this Code is to **lay the foundations for the expected behaviour of the people linked to FIIAPP, establishing the principles, values and patterns of conduct that should guide our actions.** All this with the aim of:

- Implementing the activities designed to fulfil our mission with the **highest level of ethics, integrity, respect, responsibility and compliance** with current legislation, all in line with our principles and values. We promote public systems that guarantee rights and, therefore, our individual actions must be consistent with the rights and development promoted by our projects.



- Offering guidelines to follow when faced with ethical dilemmas or doubts regarding the interpretation of ethical issues that may arise during the performance of our duties.
- Preventing, detecting and responding immediately to any conduct that violates our Code, in order to prevent it from happening in the future.

We operate in complex contexts, in a changing environment and with multiple actors. We operate in a wide variety of situations and circumstances, making it impossible to collect all of them in detail in a single Code. Nevertheless, the absence of guidance on a particular scenario does not exempt us from acting in accordance with the law and our values. We have an [ethics channel](#), which is freely and publicly accessible on any device, through which ethics-related queries can be raised.

We are committed to fostering a **preventive culture towards compliance** based on the application of our organisational values and on the principle of “**zero tolerance**” towards any **irregular and/or illegal** conduct, and to this end we have the necessary means to enforce compliance. In this regard, FIIAPP expressly prohibits the commission of crimes in any form and any type of non-compliance that may constitute a violation of current legislation.

The **scope of application** of this Code extends to all related persons linked to FIIAPP in the fulfilment of its mission, regardless of their position and the place where they provide their services, and it is valid during the period in which they are linked. We understand related persons to include:

- All FIIAPP **working personnel**.
- All the **personnel serving the public administration** (Spanish or foreign) who are mobilised by FIIAPP, regardless of their type of connection.
- Everybody who undertakes a **professional internship** at FIIAPP on a scholarship formalised through an Educational Collaboration Agreement.
- All **persons hired commercially**, either directly or through other entities, to carry out consulting, advisory and any other tasks that have a professional relationship with FIIAPP.
- Any **person who collaborates with or participates** in FIIAPP's activities, either directly or through other entities.

Members of the **Board of Trustees**, the governing body of FIIAPP, in their capacity as senior officials in the General State Administration, are subject to the “Code of Good Governance” established by the [Integrity System of the General State Administration](#) (hereinafter, SIAGE), which contains the values¹ which aim to guide and direct their behaviour and conduct in an exemplary manner in the exercise of the corresponding public responsibilities.

¹ service to the general interest, integrity, objectivity, impartiality, transparency, confidentiality, diligence and quality, responsibility, equality and equity between women and men, austerity, credibility, dedication to public service, exemplarity, accessibility, efficiency, honesty and promotion of the cultural and environmental milieu.



The **recipient institutions** in the development programmes and projects in partner countries, as well as the staff participating in our activities, will be informed of FIIAPP's principles and values.

This policy was approved by FIIAPP's Permanent Commission, after consultation with the Works Council, on 18 November 2024, on which date it came into force.

This Code replaces the "Code of Conduct" in force until that time, which was approved in December 2020, although its initial version dates back to October 2017. It will be reviewed and updated periodically, taking into account the needs of the Foundation and the proposals channelled through the Ethics Committee.





2. PRINCIPLES AND VALUES

FIIAPP's principles are the fundamental rules that inspire, guide and govern our behaviour and decisions, and they are based on morality and integrity. Our principles emanate from the principles espoused by the constitution, the European Union, foreign policy (as contained in the [Foreign Action and Service Act](#)) and by the cooperation policy included in the [Cooperation for Sustainable Development Act](#)). These principles are: **dignity, freedom, equality, diversity, democracy, rule of law, human rights, solidarity, peace and multilateralism.**

Its **organisational values** are the fundamental standards that define the culture and identity of FIIAPP, and of the people who are linked to it. Our values are:

OUR VALUES



1 Public commitment

We are guided by the common good. We prioritise people: the general interest and the institutions that ensure no one is left behind. We are aware of the impact of our actions on the environment. Our vision is international: it crosses borders. We take on global challenges as our own and seek joint solutions. The planet is our most precious shared asset.



2 Team spirit

Unity is strength. We listen, seek synergies and build consensus, internally and externally. Our achievements are shared. We are people, we work with people: humanity and horizontality are central to this. Camaraderie, proactivity and empathy permeate our daily lives.



3 Integrity.

We do what we say we will, with rigour and honesty. Our principles guide each of our decisions. We seek excellence and exemplarity. We strive to comply with our regulatory framework, optimise the use of resources and communicate clearly and transparently.



4 Resilience

We continually adapt to changing environments.

We support evolving public policies. We strive to operate within different cultural codes. We are resilient in the face of crises, drawing lessons from them to emerge stronger. We embrace difference, we navigate uncertainty.



5 Innovation

We encourage initiative and new ideas, with dynamism and energy. We use our greatest asset - the exchange of knowledge and experience - to continuously learn and adopt new perspectives. We share and create collectively.



3. ETHICAL BEHAVIOUR

We understand **ethical behaviour** to be the way in which a person acts based on the organisational principles and values contained in this Code and always oriented towards improving the lives of people and the planet, fulfilling FIIAPP's mission.

Below we detail the ethical behaviour expected of the people associated with FIIAPP. We reject any conduct that is contrary to the provisions of this Code and that could harm the fundamental rights of individuals, FIIAPP or society. This Code is not intended to cover all possible situations or circumstances that may arise, but rather to establish guidelines that should serve as a guide for our actions.

3.1. We treat people with respect and dignity

We treat each other with respect, dignity, integrity and fairness, fostering a **respectful, healthy, safe and inclusive work environment**, where companionship, teamwork, proactivity and empathy permeate our day-to-day work.

We reject any type of harassment, discrimination, intimidation or exploitation, as well as any conduct that is offensive, humiliating or contrary to the principles of the [United Nations Universal Declaration of Human Rights](#) or the [European Union Charter of Fundamental Rights](#). We do not tolerate actions and comments that incite hatred, xenophobia, homophobia and any other type of discrimination. We do not tolerate any form of sexual abuse or exploitation of people -regardless of their age and including prostitution- or sexual activity with people under 18 years of age, even when legal in the country. For FIIAPP, it is a priority to ensure the protection of the best interests of minors under 18 years of age and respect for their rights².

We show **respect for local ideas, beliefs and customs**. We promote **horizontal relationships between equals**, based on active listening, recognising the right of all people to give their opinion on those aspects that affect them, always seeking a constructive and fruitful dialogue, reaching consensus in which all parties feel respected. We reject any abuse of power or authority towards third parties using our position in FIIAPP.

² Therefore, no person professionally linked to FIIAPP may have direct contact with minors, within the framework of our activities, without the presence of their parents or legal guardians, and/or staff from the recipient institutions. In exceptional situations where this condition cannot be met, the General Secretariat must be informed, which will determine the necessary measures to ensure the protection of minors, in line with the provisions of Article 13.5 of [Organic Law 1/1996, the Legal Protection of Minors Act](#):

"For access to and exercise of professions, trades and activities that involve regular contact with minors, it will be a requirement not to have been convicted by a final judgment of any crime against freedom and sexual indemnity, which includes sexual assault and abuse, sexual harassment, exhibitionism and sexual provocation, prostitution and sexual exploitation and corruption of minors, as well as human trafficking. To this end, anyone seeking access to such professions, trades or activities must prove this circumstance by providing a negative certificate from the Central Sexual Offenders Register."



We embrace the principles of the [Feminist Foreign Policy](#). We integrate the perspective of gender, equality and non-discrimination in our actions, promoting it from a feminist approach, to reduce inequalities between women and men, intensify efforts to close gender gaps, combat all forms of violence and discrimination and promote the empowerment of women, girls and adolescents, as well as strengthen their sexual and reproductive rights from the perspective of human rights and universal public health. To do this, we pay special attention to preventing sexual or gender-based harassment³, we are careful about using expressions that are contrary to these values and we use inclusive language. People who participate in the selection or promotion of personnel will act under the principle of equality, carrying out an inclusive definition of the professional profile and being guided by objectivity in decision-making, with an open attitude towards diversity and with the aim of identifying those people who best fit the profile and needs of the position, promoting equal opportunities at all times.

3.2. We act with integrity and diligence

Our mission is to strengthen institutions in other countries, so our way of acting must be exemplary.

No person linked to FIIAPP, regardless of their hierarchical position, may request other people to contravene the provisions of the “Code of Ethics”. Inappropriate conduct may not be justified by the order of a superior or by ignorance of this Code.

We act in compliance with the responsibilities entrusted to us, with loyalty and in defence of the general interest and of FIIAPP's interests. We always put the general interest before private interests, avoiding situations -in public spaces and before institutional interlocutors or the media- that could damage the image and reputation of FIIAPP.

We respect the law, the internal rules of FIIAPP and the commitments made to third parties in contractual agreements that apply to us within the framework of our professional relationship, including those arising from the countries in which we carry out our work. We will thus show that FIIAPP can be trusted. Any behaviour, in the private and personal sphere, that -even without violating the law- could damage the reputation of FIIAPP is prohibited. Any doubts regarding the interpretation of current legislation will be referred to the Legal Services Department, and in the case of ethical queries⁴ the Ethics Committee may be consulted through the [ethical channel](#).

FIIAPP senior and middle management staff must be aware of the internal and external obligations that affect their areas of activity, be exemplary in the performance of their duties and ensure that the staff under their hierarchical dependence receive adequate information and training to promote their appropriation and compliance.

³ Following, to this effect, the framework of action included in the "[Protocol for Prevention and Action Against Workplace Harassment](#)" and the "[Protocol for Prevention and Action Against Sexual Harassment, Harassment Based on Sex, Harassment or Violence Against LGBT People and Other Conduct Contrary to Sexual Freedom and Moral Integrity in the Workplace](#)".

⁴ Questions or queries raised regarding the interpretation or specific nature of matters of ethics or ethical dilemmas.



We promote healthy and responsible lifestyle habits, avoiding unnecessary risks to the safety, health and well-being of oneself and/or others.

We pay attention to and minimise the environmental impact of our activities. We are concerned about raising awareness among our staff regarding the impacts we generate in our projects and activities.

We are accountable for the results arising from our interventions. We acknowledge mistakes made and are proactive in solving, correcting and preventing them. We communicate clearly and truthfully. To do this, we use clear language in our communications with citizens, avoiding possible barriers, and we ensure that the information we share is complete, accurate and truthful.

3.3. We are objective and impartial in our professional relationships

We are guided by our **vocation for public service, serving the general interest**, always prioritising people and supporting institutions to ensure that no one is left behind. **We avoid any behaviour that may denote preferential or special treatment to individuals or legal entities**, always motivating the adoption of decisions based on an objective analysis and reporting as soon as possible any potential conflict of interest (real, apparent or potential) that may directly affect us or third parties in order to adopt the appropriate decisions.

We do not offer or accept gifts, hospitality or any type of advantage, favour or unjustified benefit that influences, may influence or may be interpreted as influencing the decisions made by FIIAPP, even in cases where it is a normal cultural practice or may be considered a simple courtesy⁵.

FIIAPP staff **can participate, to a limited extent, in other activities** (business-related or otherwise) other than those we carry out internally, provided that they are legal, do not conflict with our dedication and responsibilities at FIIAPP and do not constitute a breach of the regulations regarding incompatibilities⁶. When such activities are related to their duties at FIIAPP, they must be authorised in advance and in writing by the Human Resources Department, and the hierarchical superior must be duly informed.

We will strive for an **adequate separation between the private and professional**

⁵ This duty of refusal includes minor formal courtesies (corporate hospitality or invitation to lunch/dinner) that, even if of little economic value, could compromise our impartiality or objectivity in decision-making. In any case, any gift or courtesy of an estimated value of more than €100 must be returned politely or declared and delivered to the Ethics Committee, which will decide on its use, as implemented under the "[Procedure for Prevention and Management of Conflicts of Interest](#)".

⁶ Specifically, this point refers to [Law 53/1984, of December 26, on Incompatibilities of Personnel in the Service of Public Administrations](#), which is applicable to FIIAPP's working staff, and which establishes, as a general rule, the incompatibility of holding two positions in the public sector and the recognition of the compatibility of a public position with private activities, the exercise of which it respects, provided that they cannot prevent or undermine the strict fulfilment of their duties or compromise their impartiality or independence.



spheres, in order to prevent opinions or preferences that may be expressed publicly on the occasion of the exercise of fundamental rights or public freedoms from giving the impression that they represent the position of FIIAPP. We act with transparency, responsibility and prudence. To do this, we will channel information through official spokespersons determined by the Communications team. We will not provide internal information on an individual basis, even in informal spaces. On social media, it is advisable to keep profiles that offer details or images of your personal life private and to publish a safeguard on open media such as “my opinions only”. We will act with caution, even in the case of personal opinions, so as to not publish messages that may contravene our principles and values or put at risk the work of FIIAPP or its reputation.

3.4. We use resources and information responsibly

We **make responsible, rational, lawful and sustainable use of the financial and material resources** made available to us by FIIAPP, using them exclusively for the performance of our functions in order to avoid wasting or squandering them, as well as their possible diversion to other objectives.

We will use financial resources sparingly, being aware that these are public funds that come from taxpayers, and therefore must be allocated efficiently to satisfy the general interest. Travel expenses financed by FIIAPP must be duly justified, taking into account the principles of necessity, proportionality and transparency.

Technological resources are FIIAPP’s work tools, so their use must be aimed at fulfilling professional purposes, in accordance with the provisions of the “*Information Security Policy*”, with the obligation to report any security incident as stipulated in the “*Incident Management Policy*”.

We protect the confidentiality of the internal information that has been entrusted to us in the performance of our duties, and we **properly handle the personal data** in said content. We will maintain due discretion, both on matters or issues whose disclosure is legally prohibited, as well as on any other matters that we are aware of due to our association with FIIAPP, without making use of the information obtained for our own benefit or that of third parties or to the detriment of the general interest. The duty of secrecy and confidentiality will be maintained even after the professional relationship with FIIAPP has ended.



4. HOW WE PROMOTE COMPLIANCE

FIIAPP will promote compliance with this Code by making its employees aware of the Code and by providing specific training, as well as through its monitoring and compliance system.

4.1. Promulgation and acceptance

FIIAPP will communicate this Code, by different means, to all natural or legal persons included in the scope of application. Below we detail how the **acceptance commitment** will be formalised, as appropriate:

- **FIIAPP working staff:** inclusion of an acceptance clause in the employment contract. The Code will be sent in advance by email.
- **Personnel from the public administrations linked to FIIAPP through a commitment:** inclusion of an acceptance clause in the commitment. The Code will be sent in advance by email.
- **People who undertake professional internships** with FIIAPP: inclusion of an acceptance clause in the document they sign on the day of their incorporation, as a complement to the Educational Collaboration Agreement. The Code will be sent in advance by email. The Human Resources Department will be responsible for the due safekeeping of said declaration.
- **Persons hired commercially:** inclusion of a clause regarding respect for our organisational principles and values, included in our Code, in the technical specifications (tenders) or Bid-Declaration of Responsibility (minor contracts), as well as in the commercial contract to be signed by both parties, when it is formalised. In the case of personnel from a public administration, whether Spanish or foreign, hired on a commercial basis, a clause on acceptance of this Code will be included.
- **People who collaborate with or participate** in FIIAPP, either directly or through other entities: inclusion of a clause regarding respect for our organisational principles and values contained in our Code, in the document that is formalised where appropriate.

To this end, FIIAPP may implement **training and/or awareness-raising programmes** aimed at the personnel linked to the organisation, to promote the appropriation and updating of knowledge on the subject.



FIIAPP applies a policy of continuous improvement. All FIIAPP staff have the **duty to report** any conduct that might be suspected of being non-compliant and/or irregular⁷ in the implementation of FIIAPP activities, because only in this way will it be possible to adopt appropriate measures to prevent its repetition in the future and repair its consequences for people and the organisation itself. To facilitate this, we have enabled different **communication routes** through which any person may:

- **Report a complaint⁸**: in writing through the [ethics channel](#) (freely and publicly accessible on any device), with the possibility of reporting the complaint anonymously. Or in person, by requesting a face-to-face meeting with the person responsible for managing the ethics channel, depending on the topic.
- **Submit a query concerning the interpretation or clarification of ethics and compliance issues or ethical dilemmas**: in writing through the [ethics channel](#), which is freely and publicly accessible on any device.

This is without prejudice to the fact that individuals can address their queries to the relevant teams and their complaints or information to the Independent Whistleblower Protection Authority or to any other competent institution, body or organisation⁹.

In this regard, FIIAPP expressly prohibits acts constituting retaliation, including threats of retaliation and attempted retaliation against whistleblowers, provided that the report was filed in good faith.

4.2. Supervision

The Ethics Committee is the high-level, multidisciplinary collegiate body designated

⁷ Behaviour that could be suspected of being a violation of the “Code of Ethics”, an infringement and/or a possible criminal act will be considered as a non-compliance or irregularity. Accordingly, this will include conduct that is suspected to constitute workplace harassment, sexual harassment, bullying based on gender, sexual orientation or gender identity, as well as behaviour referred to in Article 2.1 of [Law 2/2023, of 20 February, regulating the protection of persons who report regulatory offences and the fight against corruption](#):

- Actions or omissions that may constitute violations of European Union Law.
- Criminal offences and serious or very serious administrative offences, with offences implying economic loss for the Public Treasury or Social Security being considered as such under all circumstances.

⁸ Whistleblowing will be understood as communication that reports any non-compliance and/or irregularity committed either by any person linked to the organisation (through a professional relationship of a commercial, civil or employment nature) during the implementation of the activities undertaken by FIIAPP, under the terms established in the [PO.YY.DEN. “Internal Ethics Information System Management Policy”](#).

⁹ As of the date of adoption of this Code, the Independent Whistleblower Protection Authority has not yet been established. Therefore, any person who has knowledge of events that could constitute fraud or irregularity in relation to projects or operations financed, in whole or in part, with funds from the European Union may bring these events to the attention of:

- The National Anti-Fraud Coordination Service (SNCA), through the [channel](#) that they have set up.
- The European Anti-Fraud Office (OLAF), following these [instructions](#).
- The European Public Prosecutor’s Office, following these [instructions](#).

In the case of information on possible anti-competitive practices, the whistleblower may use the [channel](#) set up by the Competition Department of the National Markets and Competition Commission.



by the Permanent Commission of the Board of Trustees as being responsible for the supervision, surveillance, compliance and promulgation of the FIIAPP "Code of Ethics", which will be available to all persons linked to the organisation to advise, guide and support them in matters related to ethical conduct and compliance.

It should be noted that the Permanent Commission of FIIAPP's **Board of Trustees** is ultimately responsible for ensuring and evaluating compliance with this Code. For this purpose, the Ethics Committee, via the General Secretariat, will submit to the Commission an annual report that must contain the complaints and ethical queries received, as well as any updates required to the Internal Ethics Information System and this Code.

4.3. Disciplinary regime

Any non-compliance with the provisions of this Code will be assessed within the framework of our Internal Ethics Information System and, where appropriate, sanctioned in accordance with our internal procedures, the Collective Agreement, the Workers' Statute and other applicable current legal regulations. If, once the investigation of a complaint has been closed, it is concluded that conduct contrary to the "Code of Ethics", an infringement and/or a possible criminal act has occurred, the decision-making body will emit an **opinion** on the disciplinary, precautionary and/or legal measures, taking into account the seriousness of the acts committed and the principle of proportionality, and taking into consideration circumstances such as recurrence and the damage or harm caused to people and the organisation. The measures adopted must be duly notified to the Ethics Committee.

4.3.1. Disciplinary measures

- If the disciplinary measure concerns a **staff member** or an **intern** working with FIIAPP, the Human Resources Department will be responsible for preparing the relevant documentation to initiate the imposition of the disciplinary measure.

In these cases, the formal communication of the opinion to the person(s) concerned will be issued by the Human Resources Department. However, under exceptional circumstances, such as dismissal, an assessment will be made as to whether it would be advisable for this communication to be carried out in the presence of the hierarchical superior of the person concerned or, where appropriate, by FIIAPP's General Secretariat or management.

Such communication must be made in writing, except in cases of verbal warning, expressing clearly and precisely the alleged facts, the classification of the offending conduct (minor, serious or very serious offence), the sanction imposed, and from when it takes effect.

Depending on the sanction imposed, the Human Resources Department will implement the necessary actions associated with the measure adopted. Under all circumstances, the Human Resources Department must notify the Company Committee of the sanctions imposed for very serious offences.

- In the case of **commercially contracted persons** or **persons who collaborate or participate** with FIIAPP, whether directly or through other entities, should the



investigation conclude that there are well-founded suspicions of conduct contrary to the FIIAPP “Code of Ethics”, the provisions of the document formalising the relationship, if any, and the current legal regulations that are applicable in each specific case will apply. Under these circumstances, it will be the responsibility of the Legal Services Department to evaluate the disciplinary measures to be adopted and the actions necessary for their due management.

When the person who has allegedly violated FIIAPP’s principles and values falls outside the power of direction and control of FIIAPP, the competent entity will be informed so that it can adopt and apply the appropriate measures and, where appropriate, sanction the responsible person, warning him/her that, if they do not do so, FIIAPP reserves the right to terminate the commercial relationship that unites both entities.

4.3.2. Precautionary measures

Precautionary measures deemed appropriate in each case may be adopted, taking into account that they:

- Must be based on the principle of proportionality, respecting the presumption of innocence of the person accused.
- May not impair the working conditions of the alleged victim, or cause a substantial modification thereof.

Such precautionary measures may include, among others:

- When, for security reasons and to avoid further damage, it is considered **a necessary precaution that the affected person(s) do not have access to FIIAPP’s** computer systems or facilities until the investigation is completed.
- When the non-compliance or irregularity could be related to the violation of fundamental rights, an assessment will be made of the need to **adopt organisational measures to prevent or minimise the contact of the affected person(s)** with the victim, informant (if they are not the same person) and any other possible persons involved.
- When the complaint is related to conduct that involves a very serious breach by the person responsible for managing the ethics channel, during the duration of the investigation the person will be provisionally and temporarily suspended from his or her duties on said channel (until the case is resolved), while at all times guaranteeing his or her procedural rights as an affected person. Another member of the Ethics Committee will be appointed to assume these functions on a temporary basis.

4.3.3. Legal measures

In the event that legal measures are required or when the events may lead to the generation of any type of civil, criminal or any other type of liability for FIIAPP, management of the issue will be referred to the Legal Services Department.

If it is determined that a **false accusation** has occurred with foreknowledge of such



falsehood or made with the sole purpose of harming other people or the image or reputation of FIIAPP by the reporting person, or when **the information has been obtained illegally**, the informant will not be protected by protection guarantees and will lose his or her right to confidentiality and freedom from reprisals. In such case, FIIAPP may reserve the right to take legal action in addition to disciplinary measures, as this is considered a very serious offence.

