

THE STUDENT CODE OF CONDUCT



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I. Preamble

As a diverse global community, IE University fosters positive change through education, research, sustainability, and innovation, with respect for human dignity, support for equality, and protection against discrimination, as outlined in the UN Declaration of Human Rights. Professional ethics and integrity form the very core of the IE Community. Fairness, honesty, and respect for others are not just virtues; they are what each member of the IE Community can expect from their peers. We pursue quality and academic excellence through continuous improvement.

Since its foundation fifty years ago, the IE Community has established ethical rules that apply to all its members, including the student body. This new Student Code of Conduct is the result of a thorough revision process, updating procedures to adapt to an ever-evolving educational and social environment. It also takes into account the experience acquired by the University during the application of previous regulations, as well as changes in the Spanish regulatory framework. This alignment with new legal instruments includes the Spanish constitutional Law 2/2023, of March 12th, on the university system, the Spanish Law 3/2022, of February 24th, on university coexistence, and the Spanish Royal Decree 1791/2010, of December 30th, adopting the Statute of the university student.

These principles and regulations frame IE's Ethical Standards, bridging students, faculty, and staff into one cohesive and vibrant community.

IE University students are expected to adhere to the principles and procedures defined in this Code and share responsibility for collaborating with other community members to encourage an environment coherent with the academic and community values laid down herein (*). This responsibility involves:

- Asking when a doubt arises in interpreting this Code.
- Helping others to understand and follow the rules laid down in this Code.
- Reporting any situation that may constitute a breach of rules.

Sanctions will be applied based on specific behaviours in particular situations, without assessing students' personal qualities or their behaviour in other contexts. These sanctions must adhere to the ethical standards common to all University students.

() All members of the IE Community are required to observe and comply with them although Faculty and staff members are subject to specific procedures and regulations covering the same principles and values enshrined in this Code.*

II. Ethical Standards (Core Values and Principles), Scope of Application, and Common Rules Applicable to all Ethics Procedures

II.1. ETHICAL STANDARDS: CORE VALUES AND PRINCIPLES

II.1.1. As an academic institution, IE University is built on three main pillars: innovation and entrepreneurship, a global vision, and sustainability.

II.1.2. As a community of students, faculty, staff, we are defined by these **core values**:

- To act fairly, honestly, and with respect for others.
- To create and maintain an environment for the free exchange of ideas.
- To celebrate diversity and global understanding.
- To respect academic freedom in the classroom.
- To uphold academic honesty and integrity.
- To promote well-being among our students and other members of the IE Community.
- To promote sustainable development and the preservation of natural resources.
- To recognize that people are the foremost asset of any community, including institutions and organizations.
- To preserve personal health and safety.
- To respect the right of association and assembly.

All our activities are influenced by these values. They feature prominently in the design of academic modules, assignments, extracurricular activities, and events.

II.1.3. Specifically, at IE University, we embrace the following **principles**:

- **Ethics:** IE University is dedicated to the advancement of ethics in the professional world. Professional and academic ethics and integrity are at the core of our community. Every member of the IE Community has the right to expect fairness, honesty, and respect for others from their peers.

- **Diversity:** Diversity is hardwired into IE's DNA. Different opinions, experiences, values, and identities enrich the learning process and the shared experience of the whole community, making us unique. IE University promotes a culture where every member can freely express their opinions without discrimination based on origin, culture, race, ethnicity, religious beliefs, diversity of conviction or opinion, gender identity or expression, sex, sex characteristics, sexual orientation, disability, health status, age, socio-economic status, political or syndical affinity, or any other personal or social circumstance or condition.
- **Acceptance and Respect:** IE University is a community built on ideas, and as such, we nurture and cherish academic freedom. We foster a culture of respect and acceptance of different opinions, experiences, and outlooks by creating an environment that observes mutual respect.
- **Inclusion:** IE University embraces the contribution each individual makes, not simply because humanism is at the heart of our values, but also because it is only by creating an inclusive space that we will all thrive. We encourage all members of our community to freely express themselves and contribute to the common good.
- **Equity and Justice:** As a community, we work to support equity and justice. IE University is committed to creating equity in our community by combating discriminatory ideologies, policies, and behaviours.

II.1.4. All these values and principles make up what we call **IE Ethical Standards**, which bind the entire IE Community, including students, faculty, staff, and alumni wherever they may be. However, only non-compliance within the scope of application defined below may be subject to sanction through the different processes established in the University regulations applied to the different members of the Community.

II.2. SCOPE OF APPLICATION

II.2.1. IE Ethical Standards apply to all students as members of the IE Community, including regular, exchange, and visiting students, regardless of the program they are enrolled.

II.2.2. IE University expects full compliance with IE ethical standards from all students of the IE Community wherever they may be. However, they will not be subject to judgment by the rules of this Code when the infringement occurs off-campus, with the following exceptions:

- The conduct was in connection with an IE University-related program, event, or activity where IE University exercised substantial control over both the person accused of misconduct and the context in which the incident occurred.

- When such conduct directly affects the IE Community's welfare or core values, including its reputation, as decided by IE University management.

II.3. COMMON RULES APPLICABLE TO ALL ETHICS PROCEDURES

II.3.1. COMMON RULES

II.3.1. The following common rules apply to all the ethics procedures regulated by this Code:

- Length of the process:** The length of the process will depend on the nature and extent of the allegations, the number of parties and witnesses implicated, and their availability. However, every effort will be made to conclude any process within twenty (20) business / academic days of receipt of a complaint. This timeline may be extended if exceptional circumstances occur.
- Confidentiality:** All those implicated in the process shall treat as confidential any related information. The investigation may require disclosure to the persons concerned and to witnesses for the purpose of gathering pertinent information. In such cases, disclosure will be limited to the minimum.
- Anonymity:** With the goal of protecting IE Ethical Standards, anonymous reports of potential violations may be allowed. Due to its anonymous nature, University's investigation will be limited in scope and might not result in proceedings before the relevant body, but in all cases, anonymous claims will be reviewed carefully by the Program Directions, by the Diversity Office (DO) or by the Compliance Office depending on the person involved.
- Hearing, impartiality, and contradiction:** The proceedings must ensure the hearing, fair treatment and defense of all parties implicated.
- Suspension:** All internal procedures may be suspended if there is a pending judicial action and until a final decision is taken by the courts. Notwithstanding, IE University could adopt interim measures to protect all those concerned.
- Procedure for complaints made in bad faith:** IE University accepts its responsibility to balance the rights of all parties. If an investigation reveals that a complaint is malicious or knowingly false, such charges will be dismissed and the person who filed the complaint may be subject to sanctions depending on the transgression according to Academic Standards policies or Discrimination and Harassment policies, as the case may be.

- vii. **Protection from retaliation:** IE University expressly prohibits any form of retaliation against any member of the IE community who in good faith initiates the process and /or participates in investigations, compliance reviews, or disciplinary proceedings under internal policies.

Depending on the circumstances referred to above, retaliatory acts may include but are not limited to:

- Removal from an educational or working program.
- Interference with the academic or professional career of another individual.
- Engaging in conduct which constitutes stalking, harassment, or assault.
- Encouraging others to engage in retaliatory behaviour.

- viii. **Interim measures:** When appropriate, prior to or during an investigation, IE University may take reasonable and appropriate interim steps to protect the safety and well-being of people implicated, safeguard the investigation and/or resolution, and prevent retaliation. These steps may include, but are not limited to, being removed from the class for the duration of the complaint process or being removed from the work group in the case of various students, or continuous monitoring of the affected student throughout the rest of their learning period. In cases related to discrimination and harassment, the affected person has the right to receive psychological support.

- ix. **Ethics procedure record:** A case file will be kept in IE University archives for one year after the student's graduation. For cases involving expulsion, litigation risk, or staff or faculty involvement, files may be retained until legal action expires. Decisions will be communicated to the Registrar's Office if needed for academic purposes. Records and supporting documents will be stored by the Program Direction register or the Diversity Office (DO) except those involving faculty or staff, which will be filed by the Compliance Officer.

II.3.2. COMMON DEFINITIONS

In the implementation of the ethics procedures regulated by this Code, the following definitions will apply:

- i. **Person affected:** Person who claims to be victim of misconduct.
- ii. **Person involved:** Person accused of infringement.

II.3.3. RIGHTS OF STUDENTS SUSPECTED OF AN INFRACTION

Any individual who has been suspected of misconduct must keep in mind their rights throughout the process. Such rights are as follows:

- i. The right to receive notice of the infraction they have been suspected of in writing.
- ii. The right to respond to any allegation in writing.
- iii. The right to request a private meeting in person with a representative of the program or the department concerned.
- iv. The right to see all the relevant elements of proof, whether against or for the individual's case.
- v. The right to request the testimony of witnesses or present other evidence relevant in the case.
- vi. The right to defend the case in front of the specific authority in which the case is dealt.
- vii. The right to be sanctioned only after the completion of the established procedure.
- viii. The right to appeal the decision of the case.

III. Academic Integrity and Behaviour : Principles and Procedures

III.1. ACADEMIC INTEGRITY AND BEHAVIOUR

Academic integrity is one of the main values of IE University and contributes to guarantee that the work of every one of the students is treated with equity, and that all members of IE Community and IE University properties are treated with respect, in accordance with this Code. Additionally, academic integrity has an impact on the reputation of the University; a reputation that has been built and nourished since its foundation. It is the responsibility of every one of its members to maintain it and to contribute to making it stronger.

As part of this community, students accept to work and behave with honesty and respect in their academic undertakings and towards their fellows and professors and consequently are entitled to expect academic integrity from all their peers.

Academic integrity applies to all academic work performed or submitted as part of a course, seminar or workshop, including but not limited to assignments, papers, projects, presentations, quizzes, tests or examinations (including take-home examinations or online assignments), as well as contributions to online discussion forums in programs with an online learning component.

When turning in group work, each and every member of the group is responsible for the academic integrity of the work. If sections of a group report are plagiarized, for example, it is not acceptable to just argue that those sections were written by somebody else. If one's name is on the report, that person is responsible for its academic integrity. Eventual sanctions could be modulated if the specific responsibility of a member or some members of the group could be demonstrated, for example if one or some members intended to damage the work of the rest of the group.

Professors and management staff are responsible for the organization of the assessment instruments, and they have the authority to take all the measures to ensure a proper ethical conduct and to guarantee the normal course of any assessment instrument assuring an equitable and fair evaluation to all participating students. Their reports will be considered as evidence of a possible infraction and only could be challenged if an evident mistake can be proved.

Academic integrity and behaviour is a responsibility shared by students, professors and management staff and rests on the following pillars:

- i. Creativity and original work.
- ii. Honesty in all academic activities.
- iii. Respect and correct behaviour towards the community.

III.1.1. CREATIVITY AND ORIGINAL WORK

IE University students are expected to produce and submit their own original work and to acknowledge any sources used while carrying out their academic undertakings.

Failure to act accordingly may result in **Plagiarism**, which is the dishonest and unethical practice of presenting someone else's ideas, writings, or words as if they were one's own. Plagiarism is against academic integrity, it is explicitly forbidden and will be penalized.

This conception of Plagiarism includes, but is not limited to, the following:

- i. Copying or using someone else's exact words, without using quotation marks and properly acknowledging the source.
- ii. Paraphrasing someone else's ideas (restating them using different words) without properly acknowledging the source.
- iii. Performing academic work in collaboration with someone else or with the support of artificial intelligence if not allowed by the professor or, when allowed, without properly acknowledging the other person's or artificial intelligence's help or input.
- iv. Self-plagiarism: presenting or using one's own work without mentioning its origin.

The definition of Plagiarism does not presuppose intentionality. When a student has doubts about whether they have properly cited or referenced another's thoughts, words, or collaboration, the student should seek guidance from a professor or program manager.

III.1.2. HONESTY IN ALL ACADEMIC ACTIVITIES

IE University students are expected to conduct themselves with academic honesty in all their academic undertakings.

Failure to act accordingly may result in **Dishonest Academic Behaviour**, which is a conduct intended to obtain an unfair academic advantage over one's classmates or colleagues. Dishonest Academic Behaviour is against academic integrity, it is explicitly forbidden and, therefore, will be penalized.

This conception of Dishonest Academic Behaviour includes, but is not limited to, the following:

- i. Cheating in examinations, including copying from someone else's work, using, and/or possessing unauthorized materials during an exam or connecting online to unauthorized resources, unauthorized communication with any other person during an exam on place or online, and giving or receiving unauthorized assistance during an exam, including artificial intelligence.
- ii. Obtaining unauthorized access to examination questions or answers, giving, or receiving advance knowledge of such questions or answers.
- iii. Falsifying identity in the execution of any evaluation activity.
- iv. Refraining from indicating sources in online posts on forums.
- v. Distributing or obtaining without authorization case solutions, solutions to problem sets, case teaching notes and other materials (in physical or electronic form) whose sharing could undermine the academic enterprise by giving some students an unfair advantage and/or by depriving students of the ability to learn on their own.
- vi. Using resources or information without the authorization of the professor.
- vii. Presenting any academic work obtained from, or based on material prepared by, another person, enterprise, or artificial intelligence (including students in another section or former students).
- viii. Submitting the same work for credit in more than one course, without prior authorization from the professors of each course. (If a student wishes to hand in the same project in different courses, they must get approval from both professors. If a student wishes to quote a small part of a previously submitted piece of work, they may do so. Nonetheless, the correct citation rules must be applied to avoid plagiarism, even if it is the same student's work).
- ix. Intentional interference with others' work, including the concealment of publicly available books, papers, or other information.
- x. Forgery is considered as falsifying or making improper use of any degree certificate or document attesting to academic achievement.

Policies regarding the conditions for the assessment instruments could be adopted and communicated to the student body each academic year. This Code does not cover its implementation; thus, infractions will be treated as academic breaches and sanctioned accordingly. However, if in addition to this academic breach of the conditions, objective evidence of unethical behaviour appears, that conduct will be subject to the applicable academic ethics procedures.

During an exam, professors and management staff may verify students' behaviour. If any irregularity regarding the policy is detected, the exam may be invalidated, the students involved may be asked to leave the room and the situation will be reported to the Program Direction.

After completion of an exam, the University reserves the right to perform random checks to verify the integrity of the exam. This could include technical reports on the exams and the additional intervention of the professor to directly verify the student's knowledge of the subject if there are reasonable doubts on the exam's content.

III.1.3. RESPECT AND CORRECT BEHAVIOUR

IE University students are expected to respect their peers, professors, staff, and facilities with the highest standards in the University's environment.

Failure to act accordingly may result in **Disrespectful Behaviour** towards the community, which is any conduct which may constitute an infraction of the principles of respect and tolerance for all individuals and for IE University's academic mission. This Disrespectful Behaviour is against IE ethical standards, it is explicitly forbidden and, therefore, will be penalized.

This conception of Disrespectful Behaviour includes, but are not limited to, the following:

- i. **Lack of respect toward individuals and the academic institution**, including:
 - Violence, threats of violence, verbal abuse, or defamation as or against a member of the IE community or visitors, including false accusation of breach of the IE ethics standards or criminal regulations.
 - Disrupting or causing a disturbance in classes, examinations or within the University environment, including all curricular and extracurricular activities.
 - Inobservance of the rules on behaviour during classes that could be established each academic year.

- ii. **Lack of respect for property:** Infringement of the principle of respect to others' property includes the misuse or damages to their property, as well as the buildings, furniture, equipment, educational materials, trademarks, and other intellectual property of the University or members of its community.
- iii. **Misrepresentation:** Falsifying the personal condition or impersonating someone's own position.
- iv. **Disorder and illegal activities:** Students shall refrain from engaging in behaviour that could constitute disorder or an illegal activity or against IE University rules activity. Such illegal activities may take the form of, but are not limited to:
 - The possession, traffic or use of illegal substances or weapons.
 - The involvement of minors in activities unauthorized by internal and public regulations.
 - The organization of riots on campus.
 - The use of the facilities and services for activities considered illegal according to the legislation and/or the internal regulations.
 - Gambling within the institution's facilities, except if it is demonstrated that no financial profit is derived from these activities.

III.1.4. BREACH OF ACADEMIC INTEGRITY AND BEHAVIOUR

The behaviours described in this Code are illustrative and not exhaustive. The Academic Ethics Committee may determine a breach of ethical integrity in cases not explicitly mentioned but that nonetheless violate the IE ethical standards, in particular the duties of academic honesty, respect for other community members and professional conduct.

III.2. CLASSIFICATION OF INFRACTIONS

Academic Integrity violations are categorized into three levels based on the conduct's significance and consequences:

- Minor infractions
- Serious infractions
- Very serious infractions

III.2.1. MINOR INFRACTIONS

- i. Lack of respect towards individuals or the academic institution, including disruptions in activities (non-serious disturbances).
- ii. Misuse of university premises or non- serious disrespect to property.
- iii. Inobservance of the rules on behaviour during classes that could be established each academic year.

III.2.2. SERIOUS INFRACTIONS

- i. Plagiarism.
- ii. Academic dishonesty, except for forgery that will be always considered as a very serious infraction.
- iii. Lack of respect towards other individuals or the academic institution (disrupting or causing very serious disturbance in curricular and extracurricular activities; threats of violence, verbal abuse).
- iv. Misuse of university premises or serious disrespect to property.
- v. Misrepresentation.
- vi. The utilization of the facilities and services for activities deemed illegal under applicable legislation and/or internal regulations.
- vii. Repeated occurrence of a minor infraction, regardless of whether it is of the same or different nature.

III.2.3. VERY SERIOUS INFRACTIONS

- i. Plagiarism, academic dishonesty or misrepresentation if they deserve that classification based on the severity of the violation and the context in which the conduct occurs.
- ii. Lack of respect toward other individuals or the academic institution (violence, defamation).
- iii. Forgery.
- iv. Disorder or illegal activities.

- v. Repeated occurrence of a serious infraction, regardless of whether it is of the same or different nature.

III.3. PROCEDURES FOR POTENTIAL VIOLATIONS OF ACADEMIC INTEGRITY AND BEHAVIOUR

In addition to faculty or staff members, any student is entitled to initiate a procedure for a possible breach of the academic standards by any member of the IE Community, whether a student, professor, or staff member (*). Depending on the person involved in the possible breach, the following procedures are considered:

1. Procedure when the person involved in a possible breach is a student.
2. Procedure when the person involved in a possible breach is a faculty or staff member.

() The specific procedures when a faculty or staff member is involved are referred to in Annex II below for informative purposes.*

III.3.1. PROCEDURES WHEN A STUDENT IS INVOLVED

i. ADMISSIBILITY

When a student, professor, or staff member witnesses a potential infraction of academic standards by a student or a group of students, the infraction should be reported to the Program Direction, who shall evaluate the issue, make an initial assessment, and determine whether the facts fall within the scope of this Code. Professors are especially called to react to any potential infraction they witness and to inform immediately to the Program Direction, who has the exclusive decision on the continuation of the procedure.

Depending on this first assessment, the Program Direction shall:

1. Decide that the case is not within the scope of the Code.
2. Decide that the case is within the scope of the Code and that it can be dealt at the Program Direction level as the infraction could be considered minor or serious.
3. Decide that the case is within the scope of the Code, but it shall be solved by the Academic Ethics Committee (AE Committee) as the infraction could be considered very serious (including recidivism of a previous serious infraction).

The Program Direction could require the advice of the Chair of the AE Committee in order to assess the qualification of the potential infraction.

ii. BREACH ACADEMIC INTEGRITY AND BEHAVIOUR PROCEDURE

a) Procedure before the Program Direction:

When the Program Direction decides that the case could entail a minor or serious infraction of academic integrity and behaviour they will:

- i. Inform the student of the allegations, including the relevant elements of proof in the case.
- ii. Within a reasonable time period determined by the Program Direction, provide the student with the opportunity:
 - To respond to the charges in writing.
 - To present additional evidence relevant in the case.
 - To meet in person with a representative of the program or the department concerned to defend the case.

At their discretion, the Program Direction may choose to gather additional evidence, including hearing from witnesses other than the student involved in the initial allegation. Written exchanges may occur via e-mail.

The Program Direction, based on their own competence, can then assess the case in accordance with precedents.

If the Program Direction rules that there has been an infraction of academic integrity and behaviour set forth in this Code, a sanction can be imposed based on the principles of this Code, according to the precedents, and commensurate with the infraction.

The Program Direction will communicate the decision to the student and the person in charge of ethics of the respective school within the period of twenty (20) business/academic days from the information to the student of the potential infraction. This timeline may be extended if exceptional circumstances occur.

The student has the right to appeal based on the grounds set forth in this Code.

b) Procedure before the Academic Ethics Committee (AE Committee):

The Program Direction shall refer a potential infraction of the Code to the AE Committee when the case could imply a very serious infraction of academic integrity and behaviour.

The Chairs of the respective AE Committee will consider the admissibility of the case and decide if the procedure will continue at the level of the program or the AE Committee level.

If the case is accepted for the consideration of the AE Committee, the Chair of the respective Committee will call for a meeting that can be held in-person and/or on-line, and conduct the procedure through the following steps:

- i. The Chair will convene a meeting of the Committee where the student involved will present the case in person. In order to preserve the educational character of the procedure as well as its confidentiality, the student involved may not have any external assistance at the meeting. The Committee will define the conditions for the eventual intervention of external assistance.
- ii. Before the Committee's meeting, the Chair will inform the student involved of the allegations, including the relevant elements of proof in the case, and provide the student with the opportunity to respond to the charges in writing and present evidence within a reasonable time period as determined by the Chair. The written exchange may occur via e-mail. The student's written response shall be made available to all Committee members prior to the meeting.
- iii. At its discretion, the Committee may choose to gather additional evidence, including hearing in person from witnesses other than the student involved in the initial allegation.
- iv. Committee deliberations shall be held in strict confidence, and resolutions are adopted by a simple majority vote of all members in attendance.
- v. If the Committee rules that there has been an infraction of the standards set forth in this Code, a sanction can be imposed based on the principles of this Code, according to the precedent, and commensurate with the infraction.
- vi. The Committee will communicate the decision to the student and the Program Direction within the period of fourteen (14) business/academic days from the date of the meeting. This timeline may be extended if exceptional circumstances occur.

The student has the right to appeal based on the grounds set forth in this Code.

c) Exceptional circumstances:

In cases of special urgency or seriousness or cases affecting an important number of involved students, the Program Direction may request the Chair of the AE Committee to set up a specific procedure, that will be authorized by the University Ethics and Diversity Committee and communicated to the involved parties before its implementation. This specific procedure could include, among others, the simplification of the procedure, guaranteeing in any case the possibility for the students involved to see all the relevant elements of proof and to respond in writing to any allegation.

d) Appeal:

The student has the right of one appeal against the sanction stating the arguments and evidence in support of one or more of the grounds set forth above:

- i. When the decision was taken by the Program Direction, the appeal will be addressed via email to the Dean of the School, who could delegate this task to an associate Dean.
- ii. When the decision is taken by the AE Committee, the appeal will be addressed to the Student Appeal Committee (Appeal@ie.edu).

In both cases, the appeal decision is final and closes the internal procedure.

Appeals may only be based on the following grounds:

- i. If the process deviated from this Code's rules.
- ii. If new, previously unconsidered evidence emerges.
- iii. If the sanction is clearly disproportionate to the offense, considering any aggravating or mitigating circumstances.

It should be noted that an appeal is not "a de novo" reconsideration of the whole case, nor an examination of the Program Direction's or the AE Committee's authority to hear the matter. Instead, the appeal is limited to consideration of whether any of the aforementioned grounds are present in a degree sufficient to justify revising the decisions.

Appeals must be presented within five (5) business/academic days from the date the decision is notified to the student. Appeals must be resolved by the respective appeal body within an additional period of ten (10) business/academic days from the date the appeal is presented. This timeline may be extended if exceptional circumstances occur.

The final decision will be communicated to the involved student, the Program Direction and the Registrar's Office if needed.

iii. SANCTIONS

One or more sanctions may be imposed, based on:

- i. The categorization of the behaviour set up in this Code.
- ii. The severity and/or intention of the infraction.
- iii. Any aggravating or mitigating circumstances present in the particular case:
 - Aggravating circumstances could be considered, among others, the recidivism of the action (whether of the same or different nature) and the hampering of the investigation.
 - Mitigating circumstances could be considered, among others, as the recognition of the facts, collaboration in the investigation and the repentance.
 - The intention of the infraction and the involvement in the action could be considered aggravating or mitigating circumstances.

Besides the main sanction, decided according to the importance of the infraction, accessory sanctions could be decided to mitigate the effects of the infraction. Restitution of damages or lost property will be mandatory.

Type of sanctions:

Sanctions for minor infractions:

- i. Written apology by the student to others affected by their misconduct.
- ii. Verbal or written admonishment.
- iii. Counseling or training activities.
- iv. Loss of program endorsements to optional academic activities and events.
- v. Any other sanction deemed appropriate by the authority concerned.

Sanctions for serious infractions:

- i. Re-submission of the assignment.
- ii. A failing grade in the assignment.
- iii. A failing grade in the course (ordinary or/and extraordinary call).
- iv. Loss of program endorsements to optional academic activities and events.
- v. Removal from honours lists.
- vi. Counseling or training activities.
- vii. Working hours to the benefit of the community.
- viii. Interdiction of access to the facilities or the common services.
- ix. Any other sanction deemed appropriate by the authority concerned.

Sanctions for very serious infractions:

- i. Temporal expulsion from IE University.
- ii. Permanent expulsion from IE University.
- iii. Any other sanction deemed appropriate by the authority concerned.

This procedure does not supersede any responsibilities or liabilities which may arise under any laws and/or regulations.

IV. Discrimination and Harassment: Principles and Procedures

IV.1. RESPECT TOWARDS THE COMMUNITY

Giving IE University's nature as an international academic institution harbouring students, faculty and staff from diverse backgrounds, respect to all members of the IE Community is inexcusable under any circumstances as a foundation of its community. For this reason, all members of IE University are called to refrain from any behaviour or activity that may be intentionally offensive to another person, threatening the values of tolerance and diversity.

IV.1.1. DISCRIMINATION

Discrimination is considered as adverse behaviours or treatments based not on merit but by reason of origin, culture, race, ethnicity, religious beliefs, diversity of conviction or opinion, gender identity or expression, sex, sex characteristics, sexual orientation, disability, health status, age, socio-economic status, political or syndical affinity or by any other personal or social circumstance or condition.

IV.1.2. HARASSMENT

Harassment is considered as unwelcome behaviour or speech including:

- i. **Moral harassment, bullying or mobbing:** this is systematic and reiterated harassment that takes place over a prolonged period of time, which may be incited by colleagues and/or superiors, and is based on physical and/or psychological actions aimed at making the victim give up his/her position or simply by deriving pleasure from the victim's suffering.
- ii. **Harassment on the basis of personal or social circumstance:** this type of harassment includes unwanted behaviour or language based on discrimination due to diversity of origin, culture, race, ethnicity, religious beliefs, diversity of conviction or opinion, gender identity or expression, sex, sexual characteristics, sexual orientation, disability, health status, age, socio-economic status, political or syndical affinity or by any other personal or social circumstance or condition, in such an extreme or persistent manner that interferes with that person's ability to work, terms of employment, participation in an educational program, or creates an intimidating, hostile, or offensive environment for study, work, or living.

- iii. **Sexual harassment:** this is harassment, either verbal or physical, of a sexual nature, with the intention or the effect of undermining the victim's dignity and of creating an intimidating, degrading or offensive situation.

In determining whether reported speech or conduct qualifies as harassment under this Code, IE University will consider all circumstances surrounding allegations, along with the frequency, location, severity, context, and nature of the speech or behaviour, including whether they are physically intimidating or humiliating, as opposed to an offensive remark. The intent of the speaker(s) will also be taken into account.

Harassment may be done not only face to face but through any means of communication, digital, artificial intelligence creations or manipulations or otherwise, including e-mail, telephone or voicemail, text messaging, social media, virtual environments, or other internet networks as long as the mean of communication is under IE University control.

IV.2. PROCEDURES FOR POTENTIAL DISCRIMINATION AND/OR HARASSMENT

Any student is intitled to initiate a procedure for potential discrimination and/or harassment by any member of the IE Community, whether a student, professor, or staff member (*) Depending on the person involved in the possible breach, the following procedures are considered:

1. Procedure when the person involved in a possible breach is a student.
2. Procedure when the person involved in a possible breach is a faculty or staff member.

() The specific procedures when a faculty or staff member is involved are referred to in Annex III below for informative purpose.*

Notwithstanding the scope defined in section II.2 of this Code (scope application), even if IE University cannot act, because the case is not within the scope of application previously defined, all persons who believe they may have been the subject of any form of discrimination or harassment are encouraged to speak to the Diversity Office (DO) about the incident because, even if no process is commenced or formal complaint is filed, that information will help IE University to identify any concerns about discrimination or harassment and work to address them.

IV.2.1. PROCEDURE WHEN A STUDENT IS INVOLVED

If any student, faculty, or staff feel that they have been the object of a violation of this Code harassment or discrimination rules by a student, they should submit a claim to the platform managed by the DO: [Harassment and Discrimination Intervention Line \(HDI Line\)](#).

i. INVESTIGATION

The DO Upon receipt of the claim, will investigate, issue findings, possible witnesses, etc. and If possible, and if the matter falls within the scope of application, mediate between with the parties to find a solution. The academic team with responsibility for the parties concerned could also be implicated at the request of the DO. The inquiry may include written statements, interviews, and any other sources of evidence, as appropriate.

ii. MEDIATION

Considering the results of the investigation and the nature of the alleged violation, the DO will mediate with the parties to find a solution if possible.

If the complaint cannot be resolved by mediation, The DO may refer the matter to the Harassment and Discrimination Intervention Committee (HDI Committee). The affected student can also require the DO to refer the matter to the HDI Committee.

iii. PROCEDURE BEFORE THE HDI COMMITTEE

The Chair of the HDI Committee has the authority to determine the admissibility of a case. If the Chair accepts the case, a meeting will be convened, which may be held either in-person or online, to carry out the procedure through the following steps:

- i. The Chair will convene a meeting of the Committee where the affected person will present the case in person. Alternatively, the case can be presented by the DO if chosen by the affected person.
- ii. Before the Committee's meeting, the Chair will inform the students involved of the allegations, including the relevant elements of proof in the case, and provide the student with the opportunity to respond to the charges in writing and present evidence within a reasonable time period as determined by the Chair. The written exchange may occur via e-mail.
- iii. Upon receiving statements from the students involved, a dossier including the student's written response shall be made available to all Committee members prior to the meeting.

- iv. At its discretion, the Committee may choose to gather additional evidence, including hearing in person from witnesses other than the student involved in the initial allegation.
- v. During the meeting, the presenter (either the affected person or a member of the DO if so, decided by the affected person), provides a brief overview of the case and answers questions from Committee members. After the introduction, the presenter is excused. The Director of the DO can stay for the discussion but cannot vote.
- vi. If the involved student (in case he chooses to respond to the charges in person), will be invited to enter the meeting, speak, and answer questions from the Committee. The student involved will be then excused from the rest of the meeting. In order to preserve the educational character of the procedure as well as its confidentiality, the student involved may not have any external assistance at the meeting. The Committee will define the conditions for the eventual intervention of the external assistance.
- vii. Committee deliberations shall be held in strict confidence, and resolutions are adopted by a simple majority vote of all members in attendance.
- viii. If the Committee rules that there has been an infraction of the standards set forth in this Code, a sanction can be imposed based on the principles of this Code, according to the precedent and commensurate with the violation.
- ix. The Committee will communicate the decision to the student involved and the Program Director within the period of fourteen (14) business/academic days from the date of the meeting. This timeline may be extended if exceptional circumstances occur.

Decisions shall also be communicated to the DO, which in turn will communicate the decision to the person affected and to the Registrar's Office if needed.

The student involved has the right to appeal on the grounds set forth in this Code.

iv. APPEAL

The involved student has the right of one appeal to the Student Appeal Committee via email (Apeal@ie.edu) stating the arguments and evidence in support of one or more of the following grounds :

- i. If the process deviated from this Code's rules.
- ii. If new, previously unconsidered evidence emerges.

- iii. If the sanction is clearly disproportionate to the offense, considering any aggravating or mitigating circumstances.

It should be noted that an appeal is not “a de novo” reconsideration of the whole case, nor an examination of the HDI Committee’s authority to hear the matter. Instead, the appeal is limited to consideration of whether any of the aforementioned grounds are present in a degree sufficient to justify revising the decisions.

Appeals must be presented within Five (5) business /academic days from the date the decision is notified to the student. Appeals must be resolved by the respective appeal body within an additional period of ten (10) Business/ academic days from the date the appeal is presented. This timeline may be extended if exceptional circumstances occur.

The final decision will be communicated to the involved student, the Program Direction and the Registrar’s Office if needed. Decisions shall also be communicated to the DO, which in turn will communicate the decision to the person affected.

The appeal decision is final and closes the internal procedure.

v. SANCTIONS

One or more sanctions may be imposed, based on:

- i. The categorization of the behaviour in this Code.
- ii. The severity and/or intention of the infraction.
- iii. Any aggravating or mitigating circumstances present in the particular case:
 - Aggravating circumstances could be considered, among others, the recidivism of the action (whether of the same or different nature) and the hampering of the investigation.
 - Mitigating circumstances could be considered, among others, as the recognition of the facts, collaboration in the investigation and the repentance.
 - The intention of the infraction and the involvement in the action could be considered aggravating or mitigating circumstances.

Besides the main sanction, decided according to the importance of the infraction, accessory sanctions could be decided to mitigate the effects of the infraction.

Type of sanctions:

- i. Written apology by the student to others affected by their misconduct.
- ii. Verbal or written admonishment.
- iii. Counseling or training activities.
- iv. Working hours on the benefit of the community.
- v. Interdiction or limitation of access to the facilities or the common services.
- vi. Loss of program endorsements to optional academic activities and events.
- vii. Removal from honours lists.
- viii. Temporal expulsion from IE University.
- ix. Permanent expulsion from IE University.
- x. Any other sanction deemed appropriate by the HDI Committee.

This procedure does not supersede any responsibilities or liabilities which may arise under any laws and/or regulations.

V. Procedure Regarding Suggestions on Diversity

The Student Advisory Board represents the student and alumni contributions to IE University Policies regarding ethics and diversity. This board works under the supervision of and in close coordination with the Ethics and Diversity Committee. This Board receives student suggestions on these matters and will submit its proposals to the Ethics and Diversity Committee.

Any student of undergraduate, graduate, or doctoral programs and alumni can make a written demand to the Student Advisory Board, which will discuss the proposal and request the application.

The Student Advisory Board will regularly transmit any proposals to the designated member of the Ethics and Diversity Committee for its discussion. At least once per term, the Chair of the Ethics and Diversity Committee will convene a joint meeting with the Student Advisory Board to exchange views on its suggestions and initiatives related to ethics and diversity.

The Student Advisory Board is composed of a maximum of six acting members appointed by the Ethics and Diversity Committee for each academic year among student representatives of each educational level: two undergraduate students, two graduate students, one doctorate student, as well as one member of one IE Alumni club.

VI. Final Provisions

VI.1. REPEAL OF PREVIOUS REGULATIONS

All conflicting regulations of equal or lower rank are repealed by this Code.

This Code of Ethics may be updated by the University whenever deemed necessary or when required by applicable legislation. The update will take effect upon notification to the IE Community and will apply to actions carried out from that moment onward.

IE University students are invited to present proposals and suggestions on the development of the ethical standards to preserve the diversity of the IE Community, including possible amendments to this Code, through the established procedure.

VI.2. IMPLEMENTATION AND DEVELOPMENT

The University's Ethics and Diversity Committee is authorized to establish rules and provisions for the implementation and development of the principles and procedures set forth in this Code. They are also empowered to interpret and partially review these regulations.

Under the supervision of the Ethics and Diversity Committee, the program directors at Bachelor, Master, and Doctorate levels will ensure the adoption of these regulations. They will individually address any pre-existing matters from previous academic years, adhering to the principles established in this Code, with particular attention to students previously enrolled.

VI.3. VALIDITY AND DISCLOSURE

This Code shall come into effect upon approval by the Governing Board of IE University and will be applicable, following its communication to the IE Community, to new students and, from the academic year 2025/2026 onwards, to all students enrolled in any program offered by the University, regardless of their original enrolment year.

Its content will be published immediately through standard communication channels and formats for comprehensive dissemination within the University community, in both Spanish and English versions.

VII. Annexes

ANNEX I

BOARDS AND UNITS RELATED TO THE IMPLEMENTATION OF IE UNIVERSITY ETHICAL STANDARDS

1. COMMON BOARDS

1.1. ETHICS AND DIVERSITY COMMITTEE (E&D Committee)

Members

- i. President of IE University.
- ii. General Counsel.
- iii. Vice Rector for Academic Affairs.
- iv. Vice President for Global Recruiting and Marketing.
- v. Head of Student Experience.
- vi. Deputy Dean for Ethics Diversity and inclusion.
- vii. Director Ph. D Program.
- viii. Director of the Diversity Office (DO).
- ix. Ombudsperson.
- x. The E&D Committee may invite a member of the community to join as a member when deemed appropriate.

Functions

- Overseeing protocols and procedures regarding the prevention of unethical academic behaviour.
- Overseeing protocols and procedures regarding the prevention of discrimination and harassment.
- Reporting to the decision-making bodies of IE University on the measures and protocols discussed regarding the protection of ethical academic standards, diversity, and inclusion, and recommending possible improvements or changes.
- Appointing members of the AE Committee, the HDI Committee, the Appeal committees and the Student Advisory Board.
- Coordinating with the Student Advisory Board on student diversity proposals.

Functioning

- The E&D Committee meets once a quarter, in addition to any meetings called to address specific issues.
- At least once per term during the academic year, the Chair of the E&D Committee will convene a joint meeting with the members of the Student Advisory Board to exchange views on student suggestions and initiatives related to ethics and diversity.

Contact: Deputy Dean for Ethics, Diversity and Inclusion at IE University.

Deputydeanedi@ie.edu

1.2. DIVERSITY OFFICE (DO)

Functions

The DO serves as the central point of contact for anyone wishing to file a complaint about discrimination or harassment within the IE community via the Harassment and Discrimination Intervention Line (HDI Line) platform. The DO manages complaints from all community members (faculty, staff, or students) if they involve a student and occur within the IE University environment or at events organized by IE University.

Contact: diversityline@ie.edu

Platform for submitting a claim: [Harassment and Discrimination Intervention Line](#)

1.3. COMPLIANCE OFFICE

Functions

To manage possible complaints if they involve a faculty or staff member.

Contact: complianceoffice@ie.edu

2. BOARDS RELATED TO STUDENTS

2.1. ACADEMIC ETHICS COMMITTEE (AE Committee)

Members

The AE Committee is composed of a maximum of five (5) acting members appointed by the Ethics and Diversity Committee from the administration and faculty members, and student representatives of each educational level (Bachelor, Master, and Doctorate) for each academic year. The members' mandate could be renewed.

Functions

The AE Committee will be called into session as deemed necessary to hear cases referred to by the Program Directions of the respective educational level (Bachelor, Master, and Doctorate).

Functioning

- There will be one AE Committee for Bachelor programs and one for master's programs. For Doctoral programs, the functions of the Committee will be assumed by the Doctorate Academic Commission.
- Each committee will have a Chair, designated by the E&D Committee, who will convene the meetings when appropriate. Meetings will require a minimum quorum of three members, including representatives of faculty and students.

Contact : IEU.Academics@ie.edu

2.2. HARASSMENT AND DISCRIMINATION INTERVENTION COMMITTEE (HDI Committee)

Members

- The HDI Committee is composed of five (5) members appointed by the E&D Committee from the administration, faculty members and elected students' representatives.
- The members include two (2) faculty or staff members (nominated each year by the E&D Committee), two (2) members of the Student Advisory Board (that would be decided in each case) plus the Chair.

Functions

It is called into session as deemed necessary to hear cases referred by the DO.

Functioning

The HDI Committee is presided by a Chair, who will convene the meetings when appropriate.

Contact: Chairhdic@ie.edu

2.3. THE STUDENT APPEAL COMMITTEE

Members

- i. General Counsel.
- ii. Vice Rector for Academic Affairs.
- iii. Deputy Dean for Ethics, Diversity and Inclusion.

Functions

Decisions appealed by a student from the AE Committee y and the HDI Committee.

Functioning

this Committee will meet when appropriate. Its decisions close the internal procedures and will not be subjected to any further appeal.

Contact: Appeal@ie.edu

2.4. THE STUDENT ADVISORY BOARD

Members

The Student Advisory Board is appointed by the E&D Committee. This board can have a maximum of six members:

- i. 2 members from the Bachelor Student Government.
- ii. 2 Master Students representatives
- iii. 1 PhD Student.
- iv. 1 member of one IE Alumni club.

Functions

- The Student Advisory Board receives suggestions or feedback on Diversity and Inclusion suggestions from undergraduates, graduates, doctoral programs or IE Alumni and regularly transmit any proposals to the designated member of the Ethics and Diversity Committee for its discussion.
- At least once per term, the Chair of the Ethics and Diversity Committee will convene a joint meeting with the Student Advisory Board to exchange views on its suggestions and initiatives related to ethics and diversity.
- Two members of the Student Advisory Board will represent the Student Advisory Board at the HDI Committee when called by its Chair.

Functioning

The Student Advisory Board will establish its internal procedures.

Contact: diversitysab@ie.edu.

3. BOARDS RELATED TO FACULTY AND STAFF

3.1. PROFESSIONAL DIVERSITY AND EQUALITY COMMISSION (PDEC)

Members

- i. Compliance Officer.
- ii. Chief People Officer.
- iii. Vice Rector for Coordination and Research.
- iv. Executive Vice President IE Foundation.
- v. Associate Dean of full time Faculty.
- vi. Associate Dean of adjoint and visiting Faculty.
- vii. Deputy Dean for Ethics, Diversity, and Inclusion.
- viii. Director of Communications.

Functions

The Commission is formed by 5 members out of the permanent list.

Functioning

It is called into session as deemed necessary to hear cases:

- i. Referred by the DO or the Program Direction when the complainant is a student, and the person involved is member of faculty or staff.
- ii. Cases where the complainant and the involved person are both members of faculty and staff.

Contact: ComisiondeDiversidadelgualdad@ie.edu

3.2. PROFESSIONAL APPEAL COMMITTEE

Members

- i. President of IE University.
- ii. Rector of IE University.
- iii. General Counsel.

Functions

Dealing with cases deriving from the PDEC

Functioning:

this Committee will meet when appropriate. Its decisions close the internal procedures and will not be subjected to any further appeal.

Contact: Appeal1@ie.edu

4. UNITS OF ASSISTANCE AT IE UNIVERSITY

4.1. OMBUDSPERSON

Functions

Designated person who investigates and helps settle complaints. The Ombudsperson is responsible for ensuring the respect of the rights and freedoms of all members of the university (faculty, staff, or students) in relation to the actions of various university bodies and services. The Ombudsperson may also undertake tasks of mediation, conciliation, and good office.

Contact: ombudsperson@ie.edu

4.2. IE GENDER EQUALITY OFFICE

Functions

The IE Gender Equality Office guides and advises women in matters of gender violence and promotes women's issues through conferences, information, and awareness campaigns in collaboration with the regional authorities of Castilla y León.

Contact : iegenderequalityoffice@ie.edu

4.3. COUNSELING

Functions

female/male guidance counselors are available for confidential consultation. Clinical counseling is also offered.

Contact: Undergraduate, Master and PhD students <https://ieucounseling.ie.edu/>

4.4. INFIRMARY

Segovia Campus Infirmary: enfermeriaie@preversalud.es

Madrid Campus Infirmary: enfermeriaie@preversalud.es

ANNEX II

ACADEMIC ETHICS: PROCEDURES WHEN A FACULTY OR STAFF MEMBER IS THE PERSON INVOLVED (ACCUSED OF INFRINGEMENT)

1. FIRST STEP

If the person affected is a student, they should refer the case to the Program Direction. If the matter cannot be solved, the Program Direction should report the case to the Compliance Office (ComplianceOffice@ie.edu). The Compliance Office may investigate (including external advice if necessary) issue findings, possible witness and if possible, find a solution to resolve the case or refer the case to the Professional Diversity & Equality Commission (ComisioneDiversidadelgualdad@ie.edu).

If the affected person is a faculty or staff member, they should report the case to the Compliance Office (ComplianceOffice@ie.edu), that will investigate (including external advice if necessary) issue findings, possible witness and if possible mediate with the parties to find a solution. If the complaint is not resolved by mediation, the Compliance Officer can refer the matter to the Professional Diversity & Equality Commission (ComisioneDiversidadelgualdad@ie.edu).

2. PROCEDURE BEFORE THE PROFESSIONAL DIVERSITY & EQUALITY COMMISSION (PDEC)

The Professional Diversity & Equality Commission (PDEC) will investigate the case (or will designate an individual to do so if appropriate), gather, if necessary, will ask for additional witnesses, statements, or other information, or request further investigation according to its internal procedures.

If the PDEC finds that there has been inappropriate behaviour, but not a violation of IE University's policies regarding academic standards, this inappropriate behaviour may merit counseling or training, ongoing monitoring, coaching, or other appropriate action.

If the PDEC finds that there has been a breach of IE University's policies regarding academic standards, the appropriate corrective actions will be taken in consultation with the Head of Faculty and/or HHRR.

If the conclusion is that there has been no violation of IE University's policies or standards, both parties will be informed.

3. APPEALS

Sanctions may be appealed once by the professor or staff to the Professional Appeal Committee via e-mail to (Appeal1@ie.edu), who will jointly review the case and give a final answer. This decision is final and closes the internal procedure.

Appeals may only be based on the following grounds:

- i. If the procedure has not followed the rules and principles set forth in the respective regulation.
- ii. If new evidence becomes available that was not considered in the process.
- iii. If the sanction imposed is clearly disproportionate to the infraction committed, taking into account any aggravating and/or mitigating circumstances.

Appeals must be presented in writing, stating the arguments and evidence in support of one or more of the grounds set forth above. The appeal is limited to consideration of whether any of the aforementioned grounds are present in a degree sufficient to justify revising the decisions.

Besides the involved person, the final decision will be communicated to:

- i. The affected person.
- ii. The Head of Faculty if the involved person is member of the faculty.
- iii. The HHRR Department if the involved person is a member of faculty or staff.
- iv. The Program Direction when the affected person is a student.

The decision and any supporting documents must be filed at the register of the Compliance Officer.

4. SANCTIONS

Sanctions may include, but are not limited to:

- i. Counseling or training.
- ii. Separation of the parties.
- iii. Disciplining of the accused, including a written warning, financial penalty suspension, demotion, or termination in accordance with IE University labour policy in case of employees.

Any sanctions applicable according to Article 35 of the Collective Agreement of Private Universities, Private University Centers, and Centers of Postgraduate Education.

ANNEX III

DISCRIMINATION AND HARASSMENT: PROCEDURES WHEN A FACULTY OR STAFF MEMBER IS INVOLVED (ACCUSED OF INFRINGEMENT)

1. MEDIATION

If the affected person is a student, they should submit a claim to the platform managed by the DO: [Harassment and Discrimination Intervention Line \(HDI Line\)](#).

The DO will investigate, issue findings, talk to the Academic Team with responsibility for the implicated person, possible witnesses, etc. and if possible and if the matter is under the scope of application, mediate with the parties to find a solution. If the complaint is not resolved by mediation, the affected student can require the HDI Office, to refer the matter to the Compliance Office (ComplianceOffice@ie.edu).

The Compliance Office may decide to accept the case. In such a case it will investigate (including external advice if necessary) issue findings, possible witness and if possible, find a solution to resolve the case or refer the case to the Professional Diversity & Equality Commission (ComisionedeDiversidadelgualdad@ie.edu).

If the affected person is a faculty or staff member, they should report the case to the Compliance Office (ComplianceOffice@ie.edu), that will investigate, (including external advice if necessary) issue findings, possible witness and if possible find a solution to resolve refer the matter to the Professional (ComisionedeDiversidadelgualdad@ie.edu).

2. PROCEDURE BEFORE THE PROFESSIONAL DIVERSITY & EQUALITY COMMISSION (PDEC)

The Professional Diversity & Equality Commission (PDEC) will investigate the case (or will designate an individual to do so if appropriate), gather the facts and review all the information, and if necessary, will ask for additional witnesses, statements, or other information, or request further investigation.

If the PDEC finds that there has been inappropriate behaviour, but not a violation of IE University's policies regarding discrimination and harassment, this inappropriate behaviour may merit counseling or training, discipline, ongoing monitoring, coaching, or other appropriate action.

If the PDEC finds that there has been a breach of IE University's policies regarding discrimination and harassment, the appropriate corrective actions will be taken in consultation with the Head of Faculty and/or the HHRR Department.

If the conclusion is that there has been no violation of IE's policies or standards, both parties will be informed.

3. APPEALS

Sanctions may be appealed by the professor or staff to the Professional Appeal Committee via e-mail to (Appeal1@ie.edu), whose decision is final.

Appeals may only be based on the following grounds:

- i. If the procedure has not followed the rules and principles set forth in the respective regulation.
- ii. If new evidence becomes available that was not considered in the process.
- iii. If the sanction imposed is clearly disproportionate to the infraction committed, taking into account any aggravating and/or mitigating circumstances.

Appeals must be presented in writing, stating the arguments and evidence in support of one or more of the grounds set forth above. The appeal is limited to consideration of whether any of the aforementioned grounds are present in a degree sufficient to justify revising the decisions.

Besides the involved and the affected persons, the final decision will be communicated to:

- i. The DO when the affected person is a student.
- ii. The Head of Faculty and/or the HHRR Department when the involved person is a member of faculty or staff.

The decision and any supporting documents must be filed at the register of the Compliance Officer.

4. SANCTIONS

Sanctions may include, but are not limited to:

- i. Counseling or training.
- ii. Separation of the parties.
- iii. Disciplining of the accused, including a written warning, financial penalty, suspension, demotion, or termination in accordance with IE University labor policy in case of employees.

Any sanctions to employees will be in accordance with Article 35 of the Collective Agreement of Private Universities, Private University Centers, and Centers of Postgraduate Education.

ANNEX IV

PROCEDURE WHEN AN ALUMNI IS INVOLVED

All alumni club constituents –including its officers, members, volunteers, and guests– share the duty to promote and uphold IE community standards. This means acting in a considerate manner towards all club constituents in accordance with the University mission and its community values. Governed by these actions, IE University aspires to maintain and strengthen trust and confidence in the integrity of the alumni club network worldwide.

Alumni clubs and their constituents pledge to operate solely to further the goals of IE University and for the benefit of its constituent base (as stated in the club guidelines) and not to further any business or individual agendas. Alumni are expected to respect these policies and will be subject to the following rules in cases of potential violation that occur in IE University-related events, wherever they may be located, and/or if they particularly affect IE community welfare.

1. PROCEDURE

Complaints and/or reports associated with a breach of these policies and/or club guidelines must be made and submitted to the president of the respective alumni club.

The president of the alumni club will decide if the complaint should be further investigated, and in that case will contact the involved member in writing. The involved member will be given full and fair opportunity to present his/her case either orally and/or in writing at a time and place to be determined.

The president of the alumni club may decide either to resolve the case directly or to take it to the IE University alumni management of alumni clubs for further investigation and a final decision, sending an e mail to clubs@ie.edu.

2. SANCTIONS

IE University reserves the right to determine the appropriate measures to be taken if the final resolution is that breach of IE University ethical academic standards has taken place. Such actions may include termination of club membership, suspension of specific rights and privileges, or other such disciplinary measures.

A member who is disciplined as a result of misconduct will be notified in writing by the president of the respective club or by IE University alumni management.

This procedure does not supersede any responsibilities or liabilities which may arise under any laws and/or regulations.