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**CODE OF ETHICS**  
**FUNDACIÓN REAL ESCUELA ANDALUZA DEL ARTE ECUESTRE**  
**(FREAAE)**

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## **MANAGING DIRECTOR'S STATEMENT**

The Fundación Real Escuela Andaluza del Arte Ecuestre (FREAAE), as an internationally renowned public institution, firmly commits to conducting its activities in accordance with the highest standards of integrity, responsibility, and excellence. This Code of Ethics reflects our institutional culture and serves as a guide to ensuring exemplary conduct, both in our internal relationships and in our engagement with society.

The FREAAE Code of Ethics constitutes an essential guide setting out the values and principles that should underpin our decisions and conduct. Far from being a mere formality, this document is a living tool that strengthens our organisational culture, facilitates responsible decision-making, and safeguards both our institutional reputation and the trust placed in us by our users, partners, and society as a whole.

The Board of Trustees and Management invite everyone associated with the FREAAE to embrace these principles as their own, thereby strengthening the trust that the public places in our work. The preservation of Andalusian equestrian art, respect for animals, our commitment to education and training, and public service are non-negotiable pillars that this document sets out and develops.

Rafael Olvera Porcel  
Managing Director  
Fundación Real Escuela Andaluza del Arte Ecuestre

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## **1. INTRODUCTION**

This Code of Ethics sets out the framework of professional and ethical conduct that should guide everyone associated with the FREAAE. Its purpose is to promote an institutional culture guided by shared values, provide guidance on the conduct expected of those who form part of the institution, and strengthen society's confidence in the public management of the organisation.

As a global benchmark in the field of classical Andalusian equestrian art, the FREAAE assumes the responsibility to act in an exemplary manner, honouring its legacy while projecting into the future an approach that is responsible, transparent, and committed to the public interest.

## **2. PURPOSE AND OBJECTIVES**

The purpose of this Code is to establish the ethical principles and standards of conduct that should govern the behaviour of everyone associated with the FREAAE. Its main objectives are:

- To promote an institutional culture based on integrity, respect, responsibility, and excellence, thereby consolidating the FREAAE's national and international prestige.
- To prevent conduct that is contrary to the FREAAE's values, applicable law, or public image. This Code constitutes a fundamental pillar of the institution's compliance programme, promoting and reflecting a culture of compliance with the law and internal regulations, together with a "zero-tolerance" approach to criminal conduct.
- To serve as a guidance and reference tool in situations involving ethical dilemmas or conflicts of interest.
- To embed ethics into the day-to-day activities of the FREAAE, as the foundation for exemplary management and the provision of high-quality public services.

## **3. SCOPE OF APPLICATION**

This Code of Ethics applies to all individuals and legal entities that have a professional, contractual, or institutional relationship with the FREAAE, including, but not limited to:

- Members of the Board of Trustees and of the governing and representative bodies.

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- Management, technical, administrative, and support staff of the FREAAE, regardless of their contractual status or applicable legal framework.
  - Students, training staff, the veterinary team, and any other professionals involved in training or technical activities.
  - Suppliers, contractors, collaborating companies, volunteers, and external personnel.

Compliance with this Code is mandatory in connection with all activities, duties, services, or representations carried out on behalf of the FREAAE.

## **4. GENERAL ETHICAL PRINCIPLES AND VALUES**

The ethical principles and values of the Fundación Real Escuela Andaluza del Arte Ecuestre constitute the core of its institutional identity. They provide the framework guiding the daily conduct of everyone associated with the FREAAE and enable the institution to build a strong, consistent organisational culture committed to the public interest. Their practical application is not optional, but an inherent part of fulfilling the institution's founding purposes and upholding the public image of excellence that the institution represents.

### **FUNDAMENTAL INSTITUTIONAL COMMITMENTS**

#### **4.1 Compliance with the Law and Internal Regulations**

All persons subject to this Code are required to strictly comply with the applicable legislation governing their duties, as well as with the rules, procedures, and internal guidelines of the FREAAE. They must also act in accordance with the values and principles set out in this Code, refraining from any conduct that could jeopardise the institution's reputation or undermine public trust.

The FREAAE will ensure that all persons carrying out activities on its behalf have access to the information and training necessary to understand the laws and regulations applicable to the performance of their duties. Likewise, they must refrain from participating in unlawful practices, report any known breaches, and use the channels established for reporting irregularities.

#### **A. Relations with Institutions, Authorities, and Public Officials**

In its dealings with public administrations, authorities, institutional representatives, and public bodies, conduct must be guided by legality, integrity, and the highest standards of transparency. It is prohibited to offer, request, or accept gifts, favours, or advantages of any kind, except for tokens of courtesy that

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are symbolic and reasonable in value and consistent with customary institutional practices. Under no circumstances shall cash payments or practices intended to improperly influence the actions of third parties be permitted.

**A. Anti-Corruption and Anti-Bribery Measures**

Under no circumstances may any person subject to this Code of Ethics “offer, promise, give, or accept an undue advantage to or from a public official, employee, or representative of a private company, directly or indirectly, in order to obtain or retain business or any other unlawful advantage.” All such persons shall unequivocally reject any form of corrupt practice, particularly bribery, and shall report any corrupt practice of which they become aware.

**B. Anti-Fraud Measures**

The FREAAE further undertakes to strictly comply with the applicable legal and economic and financial control requirements governing grants, contracts, and public funding, establishing effective preventive measures against corruption, bribery, fraud, and money laundering.

## **PEOPLE AND HUMAN RELATIONS**

### **4.2 Respect for People**

The FREAAE recognises that its people are its most valuable asset. Respect for the dignity, integrity, and rights of all individuals is a fundamental and non-negotiable value. The institution categorically rejects any form of harassment, intimidation, abuse, physical or verbal aggression, as well as any manifestation of disrespect or degrading treatment. The FREAAE will adopt appropriate measures to prevent and address such conduct, including disciplinary measures in accordance with applicable regulations.

The FREAAE will actively promote the personal and professional development of its people, fostering a positive organisational climate based on trust, collaboration, active listening, and the healthy management of conflicts. Respect must underpin relationships among all individuals, who must remain vigilant for any form of violence, abuse, or discrimination and cooperate in its detection and reporting through the established channels.

The FREAAE also undertakes to facilitate the reconciliation of personal, family, and professional responsibilities, ensuring working conditions that respect individual rights and promote the workplace integration of persons with disabilities or those in vulnerable situations.

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#### **A. Equal Opportunities, Professional Development, and Non-Discrimination**

No form of discrimination on the grounds of sex, sexual orientation, gender identity, race, ethnicity, religion, marital status, disability, age, or any other personal or social circumstance will be tolerated. The FREAAE guarantees equal opportunities in both recruitment and professional advancement, basing selection, assessment, and recognition processes on the principles of merit and ability. Equality Plans will also be promoted in compliance with applicable legislation.

#### **B. Workplace Harassment, Sexual Harassment, and Harassment on the Grounds of Sex**

The FREAAE prohibits any conduct constituting harassment in the workplace, including moral harassment, sexual harassment, or harassment on the grounds of sex. This commitment will be implemented through preventive measures, clear procedures for addressing such conduct, and appropriate channels for the reporting, investigation, and resolution of such situations.

#### **C. Respect for Human Rights**

The FREAAE is committed to respecting and promoting the human rights recognised in international treaties and standards. It expressly rejects any form of forced labour, exploitation, or inhumane treatment and undertakes to maintain a dignified, safe, and respectful working environment, both in its direct activities and throughout its value chain.

### **4.3 Institutional Loyalty and Prevention of Conflicts of Interest**

Persons associated with the FREAAE must act loyally towards the institution's purposes and values, avoiding any situation that could give rise to a conflict between their personal, family, or financial interests and the interests of the institution. Objectivity, impartiality, and a commitment to public service must at all times prevail over any private interest.

A conflict of interest shall be deemed to exist when a person participates in decisions concerning matters in which they themselves, immediate family members, or third parties with whom they have close ties have competing interests. In such cases, the person concerned must refrain from participating in the decision, immediately inform their line manager or the Compliance Committee, and in no way seek to influence the outcome of the matter.

In particular, persons must refrain from participating when:

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- They have a personal interest in the matter or in another matter that could influence it, or maintain a corporate or legal dispute relationship with any interested party.
  - There is a marital, domestic partnership, or family relationship, up to the fourth degree of consanguinity or second degree of affinity, with any of the persons or bodies concerned.
  - There is a close personal friendship or manifest hostility towards any of the persons involved in the proceedings.
  - They have previously acted as a witness or expert in the same proceedings.
  - They have had a professional relationship with an interested party during the previous two years.

#### **A. Gifts, Commissions, or Remuneration from Third Parties**

The acceptance of gifts, invitations, commissions, or any other form of compensation from third parties —such as suppliers, collaborating entities, or sponsors— is prohibited, except in the case of symbolic or customary tokens of courtesy that are reasonable, proportionate, and do not compromise independence or impartiality. Such benefits must comply with the institution's internal guidelines. In case of doubt, the matter must be referred to the Ethics Committee, and the offer must be declined courteously and with the appropriate documentation.

#### **B. Industrial and Intellectual Property Rights**

Furthermore, the FREAAE and its members undertake to strictly respect intellectual and industrial property rights, both their own and those belonging to third parties. Any use of materials, products, documentation, or content must comply with applicable copyright, patent, and trademark laws, including the proper acknowledgement of and respect for third-party rights.

### **4.4 Occupational Health and Safety**

The Fundación Real Escuela Andaluza del Arte Ecuestre is firmly committed to ensuring a safe and healthy working environment for all persons within its organisation. In compliance with applicable occupational health and safety legislation, the institution will implement the technical and organisational measures necessary to eliminate or reduce the risks associated with the performance of its activities, including those specific to the equestrian field.

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Professional activities shall always be carried out with due respect for the dignity, integrity, and well-being of employees, providing working environments that promote both physical and emotional health. The FREAAE will provide appropriate protective equipment for each position and will promote the active participation of its personnel in the continuous improvement of health and safety conditions.

In addition, specific and ongoing training in occupational health and safety will be provided, and compliance with all internal protocols will be required of personnel, students, collaborators, and contractors. The FREAAE will ensure that its suppliers and collaborators likewise comply with and apply occupational health and safety legislation.

All persons associated with the institution must be familiar with and comply with the established safety rules, use protective equipment correctly, remain vigilant with regard to any potential risks, and promptly report any incident or situation that could compromise their own safety or that of others.

The consumption, possession, distribution, or manufacture of narcotic or psychotropic substances is strictly prohibited, as is the consumption of alcohol or the improper use of medication during working hours or in the workplace, given their potential negative impact on safety, health, and the institution's public image.

## **HERITAGE, IDENTITY AND LEGACY**

### **4.5 Protection of Cultural Heritage**

The Fundación Real Escuela Andaluza del Arte Ecuestre has an ethical and institutional duty to preserve, safeguard, and promote the rich cultural heritage entrusted to it. This commitment encompasses both tangible heritage—including the Palacio del Recreo de las Cadenas, its historic gardens, and the architectural and infrastructure complex in which the institution is located—and intangible heritage, represented by Andalusian equestrian art and its unique techniques, traditions, knowledge, and cultural expressions.

With regard to its architectural and natural heritage, all persons associated with the institution must actively contribute to its care, maintenance, and responsible promotion. Any use of the facilities must ensure their preservation and respect for their historical, artistic, and environmental value. The Botanical Garden, as a living environment and educational space, shall be managed sustainably, in a manner that is compatible with biodiversity and ensures its preservation and accessibility for future generations.

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With regard to its equestrian legacy, the Foundation has a mission to protect and transmit the values, techniques, and expressions of Andalusian equestrian art as an element of intangible cultural heritage. This legacy must be taught faithfully, practised with respect, and disseminated authentically, avoiding its trivialisation or decontextualisation. All persons involved in training, artistic, or technical activities have a responsibility to act as active custodians of this heritage.

The FREAAE will also promote awareness-raising, research, institutional cooperation, and dissemination initiatives, both nationally and internationally, to ensure the comprehensive safeguarding of its cultural heritage in all its dimensions.

#### **4.6 Protection of Animal and Equine Welfare**

Horses, as an essential part of the spirit of the FREAAE, must be treated with respect, patience, and care. Training and dressage must be carried out without coercion, using methods based on positive reinforcement and supported by continuous veterinary and technical supervision.

The FREAAE places animal welfare at the heart of its institutional identity and considers horses not only an essential part of its living heritage, but also animals deserving of special protection. Their care, treatment, and handling must be guided by the highest standards of respect, professionalism, and sensitivity.

Training and dressage shall always be carried out in accordance with the principles of positive reinforcement, using respectful and progressive techniques that are free from coercion. The FREAAE shall ensure continuous and specialised veterinary care, appropriate nutrition, clean and safe facilities, and balanced routines that respect the horses' need for rest, exercise, and social interaction.

All persons associated with the institution have an ethical and professional duty to act in the best interests of the animals' physical and emotional welfare. Any negligence, mistreatment, improper treatment, or conduct incompatible with these principles shall be considered a serious ethical breach and shall be addressed in accordance with the established internal procedures.

Furthermore, the FREAAE will promote awareness, ongoing training, and the continuous improvement of its protocols in this area, taking as a reference the best international practices in the classical equestrian sector and the recommendations of specialised animal welfare organisations.

#### **4.7 Professional and Training Excellence**

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The FREAAE will promote excellence in the performance of all its functions, fostering continuous improvement, technical and pedagogical innovation, and the recognition of merit as essential elements of its organisational model. The ongoing updating of knowledge and methods will be encouraged, incorporating national and international best practices in order to ensure high-quality, cutting-edge education and training.

The transmission of Andalusian equestrian art shall be carried out with professional rigour and deep respect for its heritage and cultural value, ensuring its preservation, authenticity, and international promotion. Each training and artistic activity shall reflect the historical richness, technical precision, and artistic sensitivity that characterise this discipline, contributing to its sustainability and recognition as a unique cultural legacy.

## **RESOURCES, INFORMATION AND THE ENVIRONMENT**

### **4.8 Use of Institutional Resources and Assets**

The material, technological, financial, and infrastructure resources of the Fundación Real Escuela Andaluza del Arte Ecuestre are public assets intended to fulfil the institution's purposes and must be used efficiently, responsibly, and exclusively for activities related to the institution's mission.

Any improper, negligent, or fraudulent use of FREAAE resources is strictly prohibited. All persons associated with the institution must safeguard its assets, preventing their deterioration, loss, misappropriation, or misuse, and contributing to their preservation and improvement.

The use of IT and technological systems shall be governed by the institution's internal policies on security, confidentiality, and responsible use. Accessing inappropriate or unlawful content is prohibited, as is installing programmes or applications without the appropriate authorisation or licence. Intellectual property rights relating to the materials and resources used must likewise be strictly respected.

The FREAAE will provide training and resources to facilitate the proper use of its assets. Persons subject to this Code must exercise due diligence in managing resources and immediately report any incident, damage, loss, or improper use detected in the course of their duties.

### **4.9 Protection of Information and Confidentiality**

The Fundación Real Escuela Andaluza del Arte Ecuestre recognises the importance of information as a strategic asset and is committed to rigorously protecting all confidential information generated or received in the course of its institutional

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activities. This obligation extends to all personal, financial, administrative, contractual, technical, and other information whose disclosure has not been authorised.

All persons associated with the FREAAE must use such information solely within the scope of their duties and must refrain from communicating or disclosing it to third parties unless expressly authorised to do so or required by law. Particular attention shall be paid to professional secrets, strategic plans, personnel or student data, supplier relationships, internal communications, and technical or sensitive documentation.

The FREAAE will ensure strict compliance with applicable legislation on the protection of personal data, in particular the General Data Protection Regulation (GDPR), ensuring the confidentiality, integrity, and availability of information. Data must be accessed, stored, and processed using authorised systems, in accordance with internal protocols and avoiding the use of unsecured devices or channels.

Any person responsible for processing data or confidential information must be familiar with the applicable legislation and internal policies governing its handling. Failure to comply with these obligations may give rise to administrative, civil, or criminal liability.

Institutional information may not be used for personal purposes or exploited for the benefit of oneself or third parties. Any incident, loss, unauthorised access, or suspected breach of confidentiality must be reported immediately to the Ethics Committee or through the appropriate channel.

#### **4.10 Sustainability and the Environment**

The Fundación Real Escuela Andaluza del Arte Ecuestre embraces sustainability as a strategic principle that is integral to its institutional commitment. As a public entity dedicated to preserving cultural and natural heritage, the FREAAE will actively promote responsible practices that minimise its environmental impact and foster harmony with its surroundings.

In carrying out its activities, particularly those relating to the use and maintenance of facilities, animal care, resource management, and the organisation of events, criteria of energy efficiency, waste reduction, responsible water use, and the efficient use of materials shall be applied.

The FREAAE will foster a culture of sustainability among its personnel, students, suppliers, and visitors, raising awareness of the importance of protecting the natural environment surrounding the institution. It will also promote initiatives aimed at improving its environmental performance and will establish monitoring and continuous improvement measures in this area.

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In its dealings with suppliers, contractors, and collaborators, the FREAAE will communicate these principles as an essential part of its values, promoting the integration of sustainability throughout its value chain.

## **5. ETHICS CHANNEL AND MECHANISMS FOR REPORTING IRREGULARITIES**

The FREAAE provides all its employees and third parties with an Ethics Channel as a secure and confidential means of reporting any irregular conduct or conduct contrary to the law or to the principles set out in this Code.

This channel guarantees the anonymity of the reporting person, respect for their integrity, protection against retaliation, and the confidentiality of the process, in accordance with Law 2/2023 of 20 February on the protection of persons who report regulatory and criminal offences and the fight against corruption.

The use of the Ethics Channel should be regarded as a duty of responsibility and commitment to integrity and transparency. Reports must be made in good faith and should provide as much information as possible. Communications will be handled by the Internal Information System Officer, who will act impartially and safeguard the rights of all parties involved.

Access to the Ethics Channel will be available through the FREAAE's corporate website, where a link will provide access to a platform operated by a specialised technology company. The platform incorporates appropriate technical measures to ensure the confidentiality and security of information, as well as anonymity where this communication option is selected.

## **6. COMPLIANCE AND OVERSIGHT OF THE CODE**

### **6.1 Compliance and Communication**

Compliance with this Code is mandatory for all persons within its scope of application. The institution will ensure that the Code is known, disseminated, and integrated into its corporate culture through training, communication, and ethical reinforcement initiatives.

### **6.2 Oversight and Monitoring**

Oversight of compliance with this Code shall be the responsibility of the Compliance Committee, which will assess its degree of implementation, propose improvements, and promote its periodic review, adapting it to new legal, social, or strategic circumstances.

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Team leaders will act as role models in complying with the Code and must lead by example and foster a culture of integrity, transparency, and responsibility among their colleagues.

### **6.1 Measures in the Event of Non-Compliance**

Any breach of this Code may result in disciplinary action being taken in accordance with the applicable legal framework and the organisation's internal procedures, without prejudice to any civil or criminal liability that may arise.

The Foundation regards this Code as an essential instrument of its governance framework, a reflection of its institutional identity, and a safeguard for its stakeholders.