

ANTI -
CORRUPTION
POLICY CS COM

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1. Introduction

Creative Solutions Communication [CS com] recognizes the crucial importance of promoting culture and the arts, not only as fundamental human expressions but also as vehicles for the intellectual enrichment of society. Our mission is to encourage creativity, cultural expression, and access to diverse forms of art. However, we understand that this commitment must be sustained by ethical principles and a constant pursuit of integrity.

1.1 Mission, Vision, and Values

Mission:

"To promote and enrich culture and the arts, providing meaningful, accessible, and inspiring cultural experiences for all people. Our commitment is to drive creativity, inclusion, and diversity, establishing a lasting cultural legacy."

Vision:

"To be recognized as a leading agency in promoting culture and the arts, widely admired for its integrity, excellence, and innovation. We aim to be a transformative force in the cultural scene, enhancing the appreciation and participation in artistic events and projects in our community and beyond."

Values:

1. Integrity: We commit to conduct our business in an ethical, transparent, and corruption-free manner, maintaining high standards of integrity in all our actions and decisions.

2. Innovation: We constantly seek new ways to promote culture and the arts, embracing creativity and experimentation as drivers of our success.

3. Inclusion: We advocate for diversity and inclusion, ensuring that culture is accessible to all people, regardless of their background, race, gender, age, or ability.

4. Transparency: We believe that transparency is fundamental to building and maintaining the trust of our audience. We commit to disclosing information in an accessible and understandable manner.

5. Excellence: We strive for excellence in all our activities, from project selection to the execution of cultural events and projects. We continually seek to improve and elevate standards in our sector.

6. Social Responsibility: We commit to being responsible corporate citizens, positively contributing to our community and the environment.

These mission, vision, and values guide our organization in its pursuit of promoting culture and the arts in an ethical, inclusive, and innovative manner. They form the foundation of our daily actions and decisions, reflecting our commitment to integrity and excellence in the promotion of culture and the arts.

1.2 Commitment to Integrity and Anti-Corruption

The success of our mission depends on our ability to conduct our activities with integrity and ethics. Creative Solutions Communication [CS com] is committed to rejecting all forms of corruption, bribery, extortion, and unethical practices. We understand that these practices erode public trust and compromise the quality of our events and projects.

1.3 Legal and Regulatory Compliance

Our organization is committed to strictly adhering to national and international laws related to anti-corruption, as well as all applicable laws and regulations within the cultural sector. This includes compliance with cultural incentive laws, regulations concerning grants, and any other legal obligations that govern our activities.

1.4 Transparency and Accountability

Transparency is fundamental for building and maintaining trust with our stakeholders, including sponsors, partners, artists, and the community at large. We commit to disclosing information about our activities, finances, and operations in an accessible and understandable manner.

2. Commitment to Integrity

The commitment to integrity is a fundamental pillar of CS com. We understand that to fulfill our mission of promoting culture and the arts, it is essential to maintain high ethical standards and resolutely reject any form of corruption. Below, we describe in detail the aspects of our commitment to integrity:

2.1 Rejection of Corruption

We recognize that corruption is harmful not only to our organization but also to society as a whole. We commit to not participate in any corrupt activities, including bribery, extortion, money laundering, or any other unethical practices.

2.2 Ethics and Personal Conduct

Our employees and board members are guided to act with honesty, impartiality, and ethics in all professional and personal interactions. We expect all members of our team to represent the values of integrity in their daily conduct.

2.3 Equity and Justice

Our commitment to integrity also extends to promoting equity and justice in our cultural activities. We ensure that all artists, projects, and initiatives have the same opportunity to be supported, regardless of external influences or personal connections.

2.4 Legal Compliance

To ensure that we uphold our commitment to integrity, we are in strict compliance with anti-corruption laws in force in our country and any jurisdiction in which we operate. This includes compliance with regulations related to sponsorship, cultural incentive laws, and grants.

2.5 Organizational Culture of Integrity

We promote an organizational culture of integrity, where ethics and integrity are valued and rewarded. This means recognizing and celebrating the actions and decisions of our employees that demonstrate a commitment to integrity.

2.6 Ongoing Training

We provide regular training on anti-corruption practices, ethics, and legal compliance to all members of our team. We understand that continuous education is fundamental to keeping all organization members up-to-date and informed about best practices.

2.7 Monitoring and Auditing

We conduct internal monitoring and regular audits to ensure that our operations align with our anti-corruption policy and applicable laws. This includes reviews of project selection processes, sponsorship contracts, and financial accountability.

2.8 Communication and Stakeholder Engagement

We openly communicate our commitments to integrity to all stakeholders, including sponsors, partners, artists, and the public. We also encourage feedback and collaboration to continuously improve our ethical practices.

This commitment to integrity forms the solid foundation upon which we build our mission to promote culture and the arts. We believe that by adhering rigorously to these principles, our organization will significantly contribute to the promotion of culture, ensuring that our events and projects are conducted with transparency and equity.

3. Guidelines for Direct Sponsorship

Direct sponsorship is an essential part of our ability to promote culture and the arts. However, to ensure that our pursuit of sponsorship is conducted with integrity, fairness, and transparency, we have established specific guidelines for the selection and management of sponsors.

3.1. Transparent Selection

The selection of sponsors and partners is a crucial process that should be based on transparent and objective criteria. For this, we follow the following guidelines:

- Affinity with the Cultural Mission: We prioritize sponsors and partners who share our values and are aligned with our mission to promote culture and the arts.
- Objective Criteria: We establish clear and measurable criteria for evaluating the suitability of sponsors, such as the value of sponsorship, the reach of the target audience, and cultural impact.
- Open Selection Process: We ensure that the selection process is open and accessible to all potential sponsors and partners who meet the established criteria.

3.2. Due Diligence

Before accepting any direct sponsorship, we conduct rigorous due diligence to ensure that the sponsor in question is not involved in corrupt or illegal practices. This process may include:

- Background Checks: We investigate the sponsor's history in relation to legal compliance, ethics, and integrity.
- Financial Review: We analyze the sponsor's financial statements to ensure their financial stability and the source of their resources.
- Examination of Conflicts of Interest: We identify and evaluate any potential conflicts of interest that may arise with the sponsor.

3.3. Financial Transparency

Maintaining detailed records is fundamental for transparency and integrity in our relationships.

- Documentation of Transactions: We maintain complete documentation of all financial transactions related to sponsorship, including agreements, invoices, and payment receipts.
- Disclosure of Amounts: We publicly disclose the sponsorship amounts and corresponding benefits granted to sponsors whenever necessary, ensuring that there is no concealment of information unless it involves the disclosure of confidential and/or strategic information that may hinder the sponsor's business. This does not apply in cases of police and judicial investigations when, at the discretion of our legal department, we may fully support the investigations.

- Rigorous Accounting: Our accounting practices are rigorous and subject to regular independent audits to ensure compliance with financial guidelines and regulations.

By adhering to these guidelines, we aim to ensure that our relationship with direct sponsors is transparent, fair, and aligned with our cultural mission. This ensures that our events and projects are supported by partners committed to integrity and who share our vision of promoting culture and the arts ethically.

4. Utilization of Cultural Incentive Laws and Grants Resources

The utilization of cultural incentive laws and resources from grants is an essential part of our strategy to promote culture and the arts. These resources are obtained from public and private sources, and, therefore, it is imperative that they are managed ethically and transparently. Below, we detail the guidelines and practices related to the use of these resources:

4.1. Compliance with Laws, Regulations, and Normative Instructions

Ensuring strict compliance with all cultural incentive laws and grant requirements is fundamental for our organization. To achieve this goal, we follow the following guidelines:

- Prior Analysis: Before submitting any project for fundraising, we conduct a comprehensive analysis of the applicable laws and regulations to ensure that all requirements are met.
- Legal Compliance: We maintain a dedicated team to monitor changes in laws and regulations related to culture and the arts, ensuring our ongoing compliance.
- Accountability: We comply with all reporting and accountability obligations established by the funding sources, disclosing information as required.

4.2. Transparency in Resource Allocation

To ensure transparency in the allocation of resources from cultural incentive laws and grants, we follow the following guidelines:

- Transparent Selection Criteria: We establish clear and objective selection criteria for choosing projects and initiatives seeking support, ensuring a fair and equitable approach.
- Public Disclosure: We publicly disclose information about selected projects, allocated amounts, and achieved results to keep all stakeholders informed.
- Monitoring and Evaluation: We implement monitoring and evaluation systems to measure the impact of funded projects and ensure that resources are used effectively.

4.3. Conflict of Interest Prevention

Preventing conflicts of interest is a priority in the use of resources from cultural incentive laws and grants. We follow these guidelines:

- Conflict of Interest Policy: We maintain a clear policy that requires employees, board members, and anyone involved in the project selection process to disclose any conflicts of interest and take measures to avoid them.

By following these guidelines, we aim to ensure that resources from cultural incentive laws and grants are used ethically, transparently, and equitably, effectively contributing to the promotion of culture and the arts. These practices reflect our commitment to complying with all regulations and legal obligations and ensuring that integrity is preserved in our cultural project financing and selection processes.

5. Training and Awareness

Section 5, which addresses training and awareness, is a critical element of our anti-corruption and integrity policy. We understand that to maintain an organizational culture of integrity and ensure that our members understand and embrace the organization's ethical principles, it is necessary to invest in training and awareness. Below, we describe our practices in this area in detail:

5.1. Ongoing Training

- **Mandatory Training:** All team members, regardless of their position or role, regularly participate in mandatory training on anti-corruption practices, ethics, and legal compliance. This includes up-to-date information on relevant laws and regulations.
- **Specific Training:** In addition to generic training, we offer specific training for roles or departments that face corruption or conflict of interest risks. This ensures that team members understand issues relevant to their responsibilities.

5.2. Awareness and Communication

- **Awareness Campaigns:** We regularly promote internal awareness campaigns to highlight the importance of integrity and the fight against corruption. We use communication materials such as videos, posters, and email communications to educate and remind team members about the organization's values and commitments.
- **Code of Ethics and Conduct:** We distribute and maintain a code of ethics and conduct that sets expectations for the behavior of team members and our suppliers. The code is periodically reviewed and updated to ensure its relevance.

5.3. Assessment and Feedback

- **Testing and Assessments:** We conduct periodic tests and assessments to measure team members' understanding of anti-corruption and integrity policies. This allows us to identify areas that require more attention and training.
- **Feedback Channels:** We maintain open communication channels for team members to report concerns, ask questions, and provide feedback on ethical matters. This includes a confidential reporting channel.

5.4. Leading by Example

- **Ethical Leadership:** The organization's leadership sets an example and serves as a reference for ethics and integrity. Leaders demonstrate ethical practices in their decisions and behaviors.

5.5. Inclusion in Performance Evaluations

- **Integrity in Performance Evaluations:** Integrity and adherence to ethical policies are included as criteria in team members' performance evaluations. This helps promote the importance of integrity throughout the organization.

5.6. Continuous Learning

- **Continuous Improvement:** We regularly assess our training and awareness programs to identify opportunities for improvement. We adapt the programs based on feedback and changes in the regulatory environment.

By investing in training and awareness, our organization reinforces its commitment to integrity and the fight against corruption. This not only helps keep our team members informed and aligned with our ethical values but also contributes to building a lasting culture of integrity at all levels of the organization.

6. Reporting and Investigations

Section 6, which deals with reporting and investigations, is a critical component of our anti-corruption and integrity policy. Establishing effective reporting channels and conducting appropriate investigations is essential to maintain an ethical and responsible environment. Below, we detail the practices and guidelines associated with this section:

6.1. Confidential Reporting Channel

- Establishment of the Channel: We have established a confidential and secure reporting channel that allows employees, partners, artists, and other stakeholders to report suspicions of corruption, unethical practices, or violations of our integrity policy.
- Accessibility and Clarity: We ensure that the reporting channel is easily accessible to everyone, with clear information and understandable instructions on how to use the system.
- Guaranteed Confidentiality: Reports are handled with the utmost confidentiality. Whistleblowers can choose to remain anonymous if they wish.

6.2. Investigation Process

- Designated Investigation Team: A dedicated and impartial team is assigned to conduct internal investigations. This team consists of professionals experienced in ethics and compliance and may, if necessary, hire an external audit company to ensure the highest level of transparency and impartiality in investigations.
- Immediate Response: We investigate all reports effectively and impartially, taking immediate actions to prevent any harm to the organization.
- Ensuring Due Process: We ensure that both whistleblowers and accused parties have the opportunity to be heard during the investigation process. This ensures fair and impartial treatment.

6.3. Whistleblower Protection

- Protection Against Retaliation: We have implemented measures to protect whistleblowers from retaliation or reprisals. Any act of retaliation is treated with severity.
- Optional Anonymity: We allow whistleblowers to choose whether they wish to remain anonymous. We ensure that personal data is protected in all cases.

6.4. Communication of Results

- Transparent Communication: We communicate the results of investigations transparently to all relevant stakeholders, as long as this does not compromise the confidentiality of the process.
- Corrective Action: When a violation is confirmed, we take appropriate corrective action, which may include contract terminations, collaborations, or legal actions as necessary.

6.5. Learning and Continuous Improvement

- Case Analysis: We analyze and learn from each whistleblower report and investigation to identify opportunities for improvement in our procedures and policies.

- Preventing Recurrences: We use the insights gained to strengthen our preventive practices and policies, reducing the risk of problem recurrence.

By establishing a confidential reporting channel and conducting transparent and impartial investigations, our organization demonstrates its commitment to maintaining integrity and ethics as fundamental values. This ensures that any violation is identified and addressed appropriately, promoting a transparent and trustworthy work environment and operations.

7. Consequences for Violations

Section 7, which deals with consequences for violations, is essential to ensure the effectiveness of our anti-corruption and integrity policy. Establishing clear and proportionate measures to address violations reinforces the importance of compliance with our ethical principles. Below, we detail the practices and guidelines associated with this section:

7.1. Disciplinary Process

- Identification of Violations: When a suspicion of ethical violation, corruption, or unethical practice is identified, the matter is immediately referred for in-depth assessment and investigation.

- Impartial Investigation: Investigations are conducted impartially by a designated team experienced in ethics and compliance. The goal is to determine whether a violation has occurred and, if so, to identify the extent of the violation.

7.2. Appropriate Consequences

- Disciplinary Actions: If a violation is confirmed, appropriate disciplinary actions are taken based on the severity of the violation. Actions may include, but are not limited to, warnings, suspensions, terminations, contract terminations, restitution, or legal actions.

- Proportionality: Consequences are proportionate to the severity of the violation. This ensures that minor infractions receive an appropriate response, while serious violations are treated more rigorously.

7.3. Whistleblower Protection

- Protection Against Retaliation: We ensure that whistleblowers reporting suspicions of corruption or unethical practices are protected against any form of retaliation.

- Preserved Confidentiality: We maintain the confidentiality of whistleblower information, allowing them to choose to remain anonymous if they wish.

7.4. Transparent Communication

- Reporting of Results: We communicate the findings of investigations and actions taken in a transparent manner to all relevant stakeholders. However, confidentiality is preserved when necessary.

- Transparency as a Deterrent: Transparent communication serves as a deterrent against violations, showing that all violations will be appropriately addressed, and corrective actions will be taken.

7.5. Learning and Continuous Improvement

- Case Analysis: We analyze each violation and the investigation process to identify opportunities for improvement in our integrity procedures and policies.

- Prevention of Recurrences: We use lessons learned to strengthen our preventive practices and reduce the risk of ethical violations recurring.

By establishing clear and proportionate consequences for violations, our organization reinforces its commitment to integrity and compliance with anti-corruption policies. This ensures that all team members are aware of the consequences of ethical violations, and the organization maintains its culture of integrity and transparency at all levels.

8. Review and Continuous Improvement

Item 8, related to review and continuous improvement, plays a crucial role in our anti-corruption and integrity policy. The ongoing review of our processes, policies, and practices helps ensure that we are always aligned with best practices and ready to face new challenges. Below, we describe in detail the practices and guidelines associated with this item:

8.1. Periodic Evaluation

- Regular Assessment: We conduct regular evaluations of our anti-corruption policy to ensure that it remains effective, up-to-date, and relevant. This includes an analysis of its clauses, procedures, and practices.
- Risk Assessment: We identify and assess the risks related to corruption and unethical practices in our operations to prioritize areas that require more attention.

8.2. Feedback and Collaboration

- Stakeholder Engagement: We actively seek feedback from our stakeholders, including employees, partners, suppliers, sponsors, and artists, to understand their concerns, suggestions, and experiences related to integrity and anti-corruption.
- External Collaboration: We may collaborate with external organizations, such as ethics and compliance experts, to review and enhance our policies and practices.

8.3. Improvements and Updates

- Policy Revisions: Based on assessments and feedback, we review and update our anti-corruption policies to ensure they remain effective and aligned with best practices.
- Enhanced Procedures: We continually improve compliance, training, and awareness procedures to reflect changes in the regulatory environment and the organization's needs.

8.4. Communication and Education

- Communication of Changes: We proactively communicate all changes to our integrity and anti-corruption policies and practices, ensuring that all team members are up-to-date.
- Ongoing Education: We continue to provide regular training and awareness to all team members, ensuring they are aware of updated policies and procedures.

8.5. Leadership Commitment

- Senior Management Engagement: The organization's senior management is committed to the ongoing review and improvement of our anti-corruption policies. This is demonstrated through their active involvement and support for integrity initiatives.
- Leadership Example: The organization's leadership serves as an example of the importance of integrity and compliance with anti-corruption policies.

Final Remarks

By adopting an approach of continuous review and improvement, our organization demonstrates its commitment to maintaining integrity and ethics as fundamental values. This ensures that our policies and practices are always up-to-date, relevant, and effective in the fight against corruption and in promoting a culture of integrity.