



Code of Conduct and Ethics Policy 01/2026

Introduction

Learnmera's work is based on trust, creativity and collaboration with clients, learners and partners across Europe and beyond. This Code of Conduct and Ethics defines how we behave and what we expect from each other in all professional contexts.

1. Core values

We commit to:

- Integrity and honesty in all dealings
- Respect and dignity for all individuals
- Transparency and accountability in use of resources
- Professional quality in our services and outputs

2. Professional behaviour

- Staff and collaborators must act in a way that upholds the reputation of Learnmera.
- Conflicts of interest must be declared to management (e.g. close personal relationships with suppliers or project partners).
- Corruption, bribery, fraud, unauthorised use of resources or falsification of documents are strictly prohibited.

3. Anti-harassment and anti-bullying

Learnmera does not tolerate:

- Harassment, sexual or otherwise
- Bullying, intimidation or humiliation
- Offensive jokes or comments related to gender, sexual orientation, race, disability, religion or any protected characteristic

This applies in person, online and on all communication channels. Anyone experiencing or witnessing such behaviour should report it to management; complaints will be taken seriously and handled confidentially.

4. Social media and communication

- When communicating on behalf of Learnmera, staff must respect confidentiality, avoid sharing sensitive information and use a professional and inclusive tone.
- Personal social media use should not damage the reputation of Learnmera or reveal confidential or internal information.

5. Cooperation in EU projects

In EU-funded projects, we commit to:

- Fulfilling our contractual obligations honestly and on time
- Accurately reporting activities, outputs and financial information
- Respecting the rules, ethical standards and visibility requirements of each programme



6. Reporting concerns (whistleblowing)

- Any staff member, freelancer or partner who suspects serious misconduct, fraud, harassment or other ethical breaches is encouraged to report it.
- Reports can be made directly to the managing director or designated contact.
- Learnmera will not tolerate retaliation against any person who raises a concern in good faith.

7. Monitoring and review

This Code will be reviewed periodically and can be updated to reflect new risks, legislation or programme expectations.