# CODE OF CONDUCT

JUNE 2016

### I. INTRODUCTION

The scope of this Code of Conduct is the Guggenheim Museum Bilbao (the "Museum"), which includes the Guggenheim Museum Bilbao Foundation, the private cultural foundation established in accordance with Law 12/1994 on Foundations in the Basque Country; the Tenedora Museo de Arte Moderno y Contemporáneo de Bilbao, S.L., owner of the art collection at the Guggenheim Museum Bilbao; and the Inmobiliaria Museo de Arte Moderno y Contemporáneo de Bilbao, S.L., owner of the Arte sphere of application of this Code of Conduct in each of these organizations shall be determined by their purpose and the nature of the activities that they perform.

This Code of Conduct contains all the behavioral guidelines and general rules that anyone involved in the management, operations, and functioning of the Museum must comply with, regardless of their level in the hierarchy, particularly its employees, managers, members of the governing bodies, volunteers, suppliers and collaborators (all of them henceforth called "professionals" or "people") according to the type of relationship they have with the Museum.

Along with this Code of Conduct, the Museum also has a set of Internal Procedures which everyone must also obey and comply with. The required actions and the best practices that the institution has assembled throughout its lifetime are gathered in the operating procedures, plans, programs, certifications, and, in general, in the management policies listed in the Appendix.

The purpose of the Museum's Code of Conduct and Internal Procedures is to shape the corporate policies of regulatory compliance and to reinforce the governing bodies' commitment to a useful, effective model of risk management and prevention which improves its operations. The Museum and its professionals are fully aware that failure to comply with this Code of Conduct and the Internal Procedures can have serious consequences for both the individual who violates them and the institution itself.

Furthermore, the Executive Committee and the Board of the Guggenheim Museum Bilbao Foundation, in their sessions held on December 14, 2015, and the Boards of Directors of the

Tenedora and Inmobiliaria Museo de Arte Moderno y Contemporáneo de Bilbao, S.L., in their sessions held on March 17, 2016, approved a Code of Ethics which contains the principles of action and best practices which shall govern individual and collective behaviors in the Museum based on a responsible, ethical vision. This Code of Ethics shall also serve as the cornerstone upon which the Code of Conduct outlined in the following section is based.

### **II. CODE OF CONDUCT**

### **1. COMPLIANCE WITH LAWS AND BEHAVIOR DUTIES**

**1.1.** The Museum and its professionals must abide by the laws currently in force, this Code of Conduct, and the Museum's Internal Procedures at all times. They must also comply with all the obligations and commitments taken on in any contractual relationship with third parties.

**1.2.** The professionals shall act towards both individual people and the Museum as an institution with honesty, integrity, diligence, and loyalty at all times. They shall contribute to the good image, reputation, and prestige of the Guggenheim brand.

#### 2. ACTIVE NON-DISCRIMINATION AND EQUAL OPPORTUNITY POLICY

**2.1.** Optimal job performance is inseparable from a climate of interpersonal relationships based on respect, trust, and cooperation among all professionals. The Museum is steadfastly committed to avoiding any situations of moral, sexual or gender-related harassment, as these situations are not only damaging to individual dignity and harmful for the work climate but also generate unwanted effects on the health, morale, confidence, and self-esteem of persons. The Museum has developed policies and procedures to investigate potential situations of moral, sexual or gender-related harassment. Examples include the "Protocol against Moral, Sexual and Gender-Related Harassment" and the "Manual to Avoid Sexist Language," which are compulsory for everyone.

**2.2.** The Museum promotes non-discrimination on the basis of race, nationality, social status, age, sex, marital status, sexual orientation, ideology, political opinion, religion, or any other personal, physical, or social condition of its professionals. To comply with this basic rule, it has developed the Management commitment for work-home balance and the "Equality Plan," which is one of the backbones of our management policy.

**2.3.** The Museum also guarantees equal opportunity for individuals in all their diversity in its selection, hiring, training, and promotion processes, as well as in individual treatment, following objective criteria. To do so, the Museum has approved a "Procedure for Hiring and Promoting Personnel," a "Procedure to Measure the Satisfaction and Commitment of Personnel," and a "Procedure for Work Performance Evaluations," which must be scrupulously implemented.

**2.4.** As part of the Museum's social commitment to the equal rights and opportunities of all individuals, regardless of their capacities, it pledges to implement policies that actively encourage the social and workplace integration of individuals with disabilities, which is a requirement if we wish to create a more equitable, fair society. To this end, it has adopted a Universal Accessibility Management System which ensures that all people, regardless of their age or disability, have the same chance to access any part of the built environment and to use and enjoy the services provided with as much autonomy as possible. Likewise, the

Museum also informs its employees about its assistance measures meant to ensure the total integration of individuals with any degree of disability in a uniquely diverse setting.

As always, the Museum will continue to partner with organizations that work to integrate individuals with disabilities into the job market.

**2.5.** The Museum respects the personal and family lives of its professionals and pledges to promote work-home policies which make it easier for them to balance their private lives and job responsibilities. The initiatives launched to this end are a good example of the organization's steadfast support of this fundamental principle, including the "CONCILIARTE Plan," the "Procedure for Maternity Protection," the "OPTIMA Committee," and the pioneering implementation of a work-home balance management system which has earned it certification as a "Family-Responsible Employer."

**2.6.** The Museum guarantees its professionals' right to privacy. This principle guides the Museum's regulation of the use of the new technologies, computer equipment, and other tools that it makes available to its professionals at work. This outlines the allowed and forbidden uses, as well as the Museum's authority to oversee proper use of these technologies, as specified in the "Privacy Data Protection Policy."

**2.7.** The Museum will promote the training of its professionals as a tool in its constant quest for excellence and career development.

### **3. WORKPLACE SAFETY**

Preventing workplace risks is an ethical, legal, and social obligation which must become yet another part of the organization's modernization and improvement, with the involvement and participation of each and every member of the staff at all levels within the hierarchy.

Improving the working conditions, wellbeing, and working and professional climate, as well as lowering on-the-job accidents and work-related illness rates, are all part of the continuous improvement cycle in the Museum's business management.

The implementation of a risk management system at all levels of operation which fosters improvements in workplace safety and health is a crucial factor in the success of riskprevention activities and in promoting and developing a preventative culture within the organization.

The Museum has established a Workplace Risk Prevention Plan which defines the underpinnings and main goals of workplace health in the organization and determined its professionals' obligations. They should take special care to observe the rules on workplace safety and health contained in the numerous plans and handbooks with the goal of preventing and minimizing workplace risks.

#### 4. TRANSPARENCY IN MANAGEMENT AND ANTI-CORRUPTION POLICY

**4.1.** The principles of integrity and transparency shall govern the organization's management. The Museum has invaluable mechanisms to ensure this, such as the approval of an "Investment Policy," the "Procedures for Financial Administration and Control," the "Procedure for the Acquisition of Artworks," the "Internal Hiring Procedures," and others, which must be complied with in all organizational operations.

Museum professionals pledge to:

- Guarantee the balance between the institution's reputation and its financing by
  performing an in-depth analysis of any offers of donation or partnership. The Museum
  will not accept donations whose provenance is unknown, which may come from illegal
  acts or criminal behaviors, or which run counter to the Museum's ethics.
- To continuously evaluate work processes and introduce any improvements and synergies needed to reinforce the economic orientation.
- To adapt the Museum spaces and maximize their use with the goal of using them efficiently and, when possible, ensuring their profitability in order to contribute to self-financing.
- To follow objectivity, transparency, and the arm's-length principle in the processes of acquiring goods and hiring services.
- To guide the Museum's economic activities towards fulfilment of its mission and achievement of goals that are in the public interest.
- To protect and preserve the assets that the institution makes available to the Museum's professionals from loss, damage, theft, or illegal use.
- To use the Museum's assets and facilities for strictly professional purposes and to avoid any unjustified private use.

- To use the resources available rationally and efficiently, and to pursue energy savings that will ensure respect for the environment.
- To reuse and recycle all materials used, especially in exhibitions, by striving to use them in future projects and/or by other cultural organizations or agents based on sustainable criteria.

**4.2.** Professionals are obligated to be familiar with and strictly apply the Museum's Anti-Corruption Policy, which is based on the following Rules:

4.2.1. Rules of action in interactions with civil servants (domestic or foreign)

**a)** Offering or giving the following to a domestic or foreign official or civil servant, either directly or via middlemen or people associated with them, is forbidden:

(i) any gift, money, favor, or service, regardless of its monetary value, which is either explicitly or implicitly conditioned upon that official or civil servant making a decision that will benefit the Museum;

(ii) any gift, money, favor, or service, regardless of its monetary value, which serves either directly or indirectly as a reward for a decision adopted previously by that official or civil servant that benefitted the Museum;

(iii) any gift, money, favor, or service whose monetary value, exceptional nature, exclusivity, or any other condition makes it exceed the common social mores and courtesies.

Accepting an official's or civil servant's request to give the gifts, money, favors, or services mentioned in the previous points is also forbidden.

**b)** Exerting influence over a domestic or international official or civil servant is forbidden in the following situations:

(i) taking advantage of the existence of a prior personal relationship (kinship, friendship, mutual business, etc.) with this specific official or civil servant or with another official or civil servant,

(ii) with the purpose of securing a decision that is beneficial to the Museum's interests.

**c)** Authorization will not be required when a corporate gift has a minimal or insignificant value.

**4.2.2.** <u>Rules of action in interactions with the private sector (with clients, suppliers, external collaborators, other museums, etc.)</u>

**a)** It is forbidden to promise, offer, or give a manager, administrator, employee, or external collaborators or any private company or entity gifts, money, favors, or services, either directly or through a third party, so that they fail to fulfil their obligations in the hiring of professional services by favoring the Museum over other centers.

**b)** Offering or giving gifts to clients or suppliers when these gifts consist of money or the equivalent in any form (checks, transfers, etc.) is forbidden, unless the gift offered has a minimal or insignificant value.

**c)** Soliciting unjustified gifts, benefits, or advantages of any nature from clients or suppliers for either oneself or a third party is forbidden.

**d)** Accepting gifts from clients or suppliers when these gifts consist of money or the equivalent in any form (checks, transfers, etc.) is forbidden.

e) The Ethics Committee must be notified by email (cetico@guggenheim-bilbao.es) of the receipt of any gift or present that falls within the common social mores and courtesies from clients or suppliers, and the person or entity giving it must be identified.

This notification is not necessary when the gift or present received has a minimal or insignificant value.

The Ethics Committee will respond to the applicant in writing (email) to grant or deny authorization to receive the gift. If this authorization is denied, the applicant must refuse the gift or, if they have already received it, they must return the gift to the donor; if they believe that returning the gift is inappropriate, the gift shall be used for charitable purposes to be determined at that time.

**f)** The Museum must observe the criteria of objectivity and impartiality when hiring suppliers and vendors. Professionals shall avoid any kind of interference or influence from clients, suppliers, or third parties which may alter their professional impartiality and objectivity.

**g)** The Museum must be notified of any invitations to deliver lectures or participate in debate panels or similar events unless they are held based on previous professional qualifications or activities and the reason for participating in these events is totally irrelevant to the job performed at the Museum. The Museum must approve these activities, which must be dealt with in compliance with any applicable internal policies.

**h)** When professionals must travel for work, they shall only accept payment of the cost of transportation, accommodation, and per diem and must refuse any other kind of payment, honorarium, or commission.

 i) Professionals may not earn money, commissions, or any other form of payment from physical or legal third parties for professional activities and services performed in the Museum or in relation to its operations.

### 4.2.3. Rules of action in relation to political parties

**a)** The Museum shall abstain from engaging in any kind of prohibited activity related to the financing of political parties. Specifically, in compliance with the laws currently in force, the Museum is forbidden from making any kind of donation or contribution, regardless of its amount and form, to any political party, federation, coalition, or group of electors.

**b)** These prohibitions are also applicable to any donations or contributions made to foundations and entities associated with or dependent on political parties under the terms stipulated in the Seventh Additional Provision of Organic Law 8/2007 dated July 4, 2007 on Political Party Financing.

#### 5. CONFLICTS OF INTEREST

Museum professionals should avoid any conflict of interest and should always report when a decision or action could entail a conflict between their own interests and those of the organization. In particular:

**5.1.** They shall not participate in businesses or economic activities that could cause a conflict of interest with the Museum without prior authorization, and under no circumstances when they could be viewed as disloyal to the Museum.

**5.2.** They cannot serve as the Museum's suppliers and providers or purchase or rent goods to the Museum without authorization.

**5.3.** They may not influence the conditions under which contracts or authorizations are granted or awarded when they have private interests in the beneficiaries, and they should abstain from taking part in any affair which may involve anything that could affect their subjectivity.

**5.4.** They should neither take part in nor approve any agreement or transaction with suppliers, artists, dealers, or advisors on behalf of the Museum if they have a kinship relationship with them or a business relationship or interest without previously informing the Museum of this relationship and securing explicit permission to do so.

**5.5.** They should not take advantage of their position in the Museum to secure personal or material benefits, nor should they take advantage of business opportunities using knowledge acquired through their professional activity.

### 6. PREVENTING MONEY LAUNDERING AND THE FINANCING OF TERRORISM

The regulations on preventing money laundering and the financing of terrorism consider art objects or antiques particularly sensitive assets. In fact, anyone who deals professionally with art objects or antiques is obligated to comply with the regulations on preventing money laundering and the financing of terrorism. Foundations and associations in general must comply as well.

The Museum and its professionals must comply with the regulations on preventing money laundering and the financing of terrorism applicable to them at all times.

The Museum's rules and procedures on this matter shall appear in the Handbook on Preventing Money Laundering and the Financing of Terrorism, with which all Museum people must comply.

### 7. RESPECT FOR THE ENVIRONMENT

The activity performed by the Museum does not have a significant impact on the environment. However, the constant quest for excellence that characterizes the Museum is also expressed in its commitment to help achieve better environmental protection and a more efficient use of natural resources. The outcome of this commitment is the Museum's implementation of an Environmental Management System in Accordance with Standard ISO 14.001.

### 8. CONFIDENTIALITY REQUIREMENT

**8.1.** The Museum abides by a "Privacy Data Protection Policy" and has a Head of Security for all matters related to confidentiality.

Any information referring to an identified and identifiable physical person (first and last names, address, email, ID number, telephone number) is considered personal data.

Under no circumstances may the professionals' personal data be used for purposes other than those stipulated legally or contractually.

Any documentation (either physical or electronic) that contains personal data must be treated with extreme confidentiality: nobody who does not need to know this information because of their job at the Museum should have access to it.

**8.2.** The Museum has an "Information Security Policy" in place which regulates the structure and organization of its IT systems and networks, as well as the mechanisms and tools that guarantee that they work properly and protect against possible intrusions.

8.3. The Museum and its professionals pledge the following:

- Not to reveal confidential information or information learned because of the job they
  perform at the Museum under any concept or circumstance, even after their relationship
  with the Museum has been severed.
- Not to reveal to third parties or the media any information obtained during their work or via their association with the Museum. This obligation will continue even after their relationship with the Museum has been severed.
- To observe the strictest confidentiality regarding information on the security of the Museum and its art collections.
- To show the utmost respect and confidentiality regarding the data, documents, and in general any information that they might have gotten from other companies and organizations which falls within their exclusive area and know-how.

#### 9. INTELLECTUAL AND INDUSTRIAL PROPERTY

In its day-to-day activities, the Museum has ongoing contact with artistic, literary, and musical works and creations, as well as with architectural and museum designs and a wide range of materials and formats that are protected by intellectual property. The Museum and its professionals must show the utmost respect in the way they use and treat all works and creations, as well as for the rights of their authors or owners.

In its effort to investigate and disseminate culture, the Museum frequently uses objects that are protected by intellectual property for analysis, commentary, or critical judgement; to illustrate didactic and educational activities; and to report on the Museum's programming and upcoming events. All of these are non-commercial uses within the framework of the non-profit mission that characterizes the Museum's operations.

The Museum's professionals must scrupulously comply with the internal procedures and regulations on intellectual property. To do so, before reproducing, publicly communicating, distributing, or otherwise exploiting any kind of creation, the Museum must secure the corresponding authorizations and licenses from its authors/owners/management organizations, and it must pay any royalties stemming from this use.

These rules must also be followed for any activity related to producing and commercializing the items in the Museum's Store-Bookstore.

Likewise, any graphic representation of the Guggenheim Museum Bilbao's building is a registered trademark held by the Guggenheim Museum Bilbao Foundation. Its use is subjected to the "Procedure to Use the Museum's Image," which contains the rules that regulate the situations and conditions under which authorizations and licenses shall be granted to third parties. Likewise, the Museum and its professionals must also show the utmost respect in their use of patents, trademarks, models, and other industrial property objects owned by third parties. Any licenses needed to use these objects must be secured prior to each use.

### 10. GENERAL RULES ON EXHIBITING WORKS OF ART

- The exhibitions will comply with the Museum's Mission, policies, and objectives.
- The exhibitions will showcase the artworks with dignity, in accordance with international museum standards.
- The information offered in the exhibitions will be well founded, correct, and academically rigorous. In addition, the information will take into account the diversity of visitors to the Museum, adapting to a wide range of expectations and demonstrating sensitivity towards all beliefs or groups represented.
- The exhibition design will strive to balance the requirements of the lenders, the standards of conservation, the security of the artistic objects, and the public's accessibility and enjoyment.
- Works with human remains or sacred objects will be exhibited with the utmost sensitivity. If the artworks include live animals, their wellbeing will be cared for.
- In the case of exhibiting replicas, reproductions, or copies, the Museum will respect the integrity of the original and will indicate the duplicate or facsimile nature of the exhibited object.
- The Museum will consider the community's suggestions about exhibition contents with diligence, respect, and sensitivity.
- Objects of questionable or unknown origin will not be included in any exhibition.
   Moreover, any object without a valid ownership title, which may have been illegally exported from its home country or an intermediate country, or for which there is reason to believe has been obtained through pillaging, the violation of human rights, or the destruction of heritage, will not be exhibited.
- The utmost caution will be exercised if third parties, which could have a direct or indirect connection to the Museum, offer artwork for exhibition in the Museum.

- Curators will work with other professionals, from within the Museum and externally, to maintain the integrity of the exhibitions and protect the institution's interests.
- Curators will keep up to date on artistic production, advances in academic research, and current international museum trends.
- Recommendations by curators regarding the incorporation of artworks into the Collection, whether through purchase, donation, gift, or bequest, will be governed by the Museum's policies and interests.
- Curators will contribute to the intellectual integrity of the artworks in the Collection, ensuring the creation of a documentary resource.
- Curators will adhere to strict curatorial and conservation criteria when granting or denying the loan of artworks from the Collection.
- In their work as Museum professionals, curators will not obtain any personal benefits from the privileged relationship they might establish with artists, lenders, sponsors, collectors, gallery owners, etc. Neither will they use their position to promote a personal, relative's, or close friends' collection of art.
- Curators will not provide professional services, such as advice, authentication, appraisal, etc., to collectors, dealers, or other art professionals. Moreover, they will report any situation that could be considered a conflict of interest.
- Curators, as well as other Museum professionals, will decline gifts of an artistic nature that could affect their decisions or interfere with the Museum's activity or its Collection. Likewise, they will report this type of situation with the utmost transparency.
- Museum professionals will exercise maximum caution before accepting private invitations to lunches, dinners, or other forms of leisure, offered by individuals or organizations, when there could be a conflicting commercial interest.

 Professionals who participate in external activities similar to those they perform at the Museum, whether paid or unpaid, will report those activities to the Museum, which reserves the right to determine if those professionals may attend in their own name or as representatives of the institution, or must withdraw their participation.

### 11. GENERAL RULES ON ACQUISITION AND DEACCESSION ARTWORKS

- The Museum's procedure concerning the acquisition of artworks will be followed in all cases, without exception.
- All works of art that are considered for a possible acquisition will be subject to an exhaustive investigation to guarantee their authenticity, quality, and historical importance.
- No work will be acquired through purchase, donation, loan, bequest, or exchange
  without the certainty that it has a valid ownership title, that the work has not been
  illegally exported from its home country or an intermediate country, and that there is no
  reason to believe it has been obtained through pillaging, the violation of human rights,
  or the destruction of heritage.
- The incorporation of artworks into the Collection will always take place under objective curatorial criteria that are in keeping with the policies and interests of the Museum.
- Archaeological, sacred, or human remains will not be acquired. If these types of remains are present in a work of art, the piece will only be incorporated into the Collection if the remains can be safely preserved and treated with respect.
- When a work of art contains biological contents, such as live botanical or geological specimens, the Museum will ensure that its acquisition does not violate laws or regulations which protect natural life/history, unless the work has express permission from the authorities of the corresponding country.
- The deaccession of objects will only occur with full awareness of the work's importance, nature (renewable or not), and legal condition, all of which will be appropriately recorded. Moreover, deaccession may not be realized at the expense of the Museum's mission of serving the public good.

- Given that the Museum Collection is a good in public custody, it cannot be considered a realizable asset. As such, the income or compensation obtained by the deaccession of a work of the Collection will be exclusively used in the benefit of the Collection.
- Museum personnel, relatives, or close friends will not be allowed to acquire artworks through deaccessions from the Collection.

### 12. GENERAL RULES ON ARTWORK REGISTRY, DOCUMENTATION, AND MANAGEMENT

- The works in the Museum Collection, those in deposit, and the loans for temporary exhibitions will all be registered and documented.
- The Museum has in place the following procedures that shall be observed at all times without exception: (i) management of the Collection; (ii) (incoming/outgoing) loans; (iii) management and control of artworks equipment; and (iv) documentation and inventory of the Collection.
- The Museum has, and will keep updated, a coherent documentary resource for its Collection, which adheres to national and international standards.
- The activities and findings gained by the research, study, or conservation of the artworks will continue to be documented, with the resulting information made available to the public.
- The Museum will meet all requirements related to the processes of acquisition, importexport, exhibition, or transport of the artworks, which are carried out under its responsibility or derived from it.
- The works of the Museum Collection, those in deposit, and the loans for temporary exhibitions will all be covered by an all-risk insurance.
- Under no circumstances will Museum professionals, their relatives, or friends appropriate artistic objects from the Museum's custody for their personal use, not even temporarily.
- The Museum will continue to follow privacy policies for the protection of information about the artworks and their owners or lenders, guaranteeing confidentiality.

### 13. GENERAL RULES ON CONSERVATION AND PROTECTION OF ARTWORKS

- The works in the Collection, as well as those in deposit and the temporary loans, whatever their nature, are treated with the same conservation and protection criteria.
- The Museum has in place the following procedures that shall be observed at all times without exception: (i) procedures for artwork preventive and corrective conservation;
   (ii) procedure for the fabrication of artwork crates; and (iii) specification manual for manipulation and handling of works of art.
- Professional responsibility for the conservation, safekeeping, and handling of the works will be given exclusively to personnel who have the appropriate experience, qualifications, and knowledge.
- The Museum follows a policy of preventive conservation, which allows for the creation and maintenance of a suitable environment for the protection of the Collection, the works in deposit, and the loans that are stored, exhibited, or in transit.
- The Museum has emergency and security plans designed to protect the artworks from potential risks, such as natural disasters, accidents, or incidents caused by people, when the works are exhibited as well as when they are stored.
- Transfer, handling, and installation processes can only be carried out by specialized transport agents and experts in the handling of artwork. Optimal work conditions and secure, air-conditioned storage spaces will be guaranteed.
- The Museum guarantees preventive conservation and restoration actions for its holdings whenever necessary.
- All preventive conservation or restoration treatments will be appropriately recorded and, whenever possible, will be reversible so that all modification to the original object can clearly be identified.
- External artistic holdings will not receive any intervention without the prior consent of their owner or managing entity, except in the case of an emergency.

### 14. GENERAL RULES ON RESEARCH AND ARCHIVE

- Research done by Museum professionals should align with the Museum's Mission and objectives and should conform to the established ethical and academic practices.
- Museum professionals will share their knowledge and experience with other researchers, experts, and scholars in their areas.
- The Museum will conserve its bibliographic resources in an appropriate archive center, which will be available to the public, free of charge. This will contribute to the preservation of such heritage for future generations as a social, educational, and informational service.

### **III. WHISTLEBLOWING PROCEDURE**

All Museum professionals are obligated to notify the organization of anything of which they are aware which poses or may pose a risk of crime or violation of the Compliance Program.

The Museum guarantees that no one who reports a complaint in good faith will suffer from any retaliation or adverse consequences of any kind for this reason.

To guarantee this, the Museum has a Whistleblowing Procedure which defines and regulates the procedure used to confidentially report presumed non-compliance directly to the Compliance Committee.

### IV. CONSEQUENCES OF NON-COMPLIANCE

Non-compliance with this Code of Conduct and the Museum's Internal Procedures will give rise to the corresponding disciplinary measures or other appropriate actions depending on the violator's relationship with the Museum. This could include termination of this relationship by the Museum as per the regulations approved by the Museum as contained in the Protocol in Case Non-Compliances Are Detected.

## APPENDIX

Below is a list of the most relevant procedures, handbooks, policies, certificates, and programs implemented in the Guggenheim Museum Bilbao:

**Collective Bargaining Agreement** Commitment to Transparency (Recognition of the most transparent museum in Spain in 2015) **Complaints and Suggestions Procedure CONCILIARTE** Plan **Data Protection Policy** Deposit Management Procedure Directors' Commitment to Private-Professional Life Balance **EFQM Silver Q Emergency Plan** Emergency Plan for Works of Art Entity collaborating with Emakunde **Equality Plan Exhibition Management System Evacuation Procedures Fire Protection Manual** Human Resources Strategic Plan Information Security Policy Internal Hiring Procedures (Foundation, Inmobiliaria, and Tenedora) Instructions Regarding the Fabrication of Crates for Works of Art Investment Policy Manual for Customs Administration and Export-Import Permissions Manual for Handling and Installing Artworks Manual to Avoid Sexist Language **Occupational Risk Prevention Plan OPTIMA** Committee **OSASUN** Project

Procedure for the Management of the Permanent Collection Procedure for the Management of Loans (incoming/outgoing) Procedure for the Management and Control of Artwork Inventory and Equipment Procedure for Hiring and Promoting Personnel Procedure for the Admittance of Artworks Procedure to Measure the Satisfaction and Commitment of Personnel Procedure on the Use of the Museum's Image Procedure for the Acquisition of Artworks Procedure for the Documentation and Inventory of the Museum's Collection Procedure for Work Performance Evaluations Procedure for Maternity Protection Procedures for the Preventative and Corrective Conservation of Artworks Procedures for Financial Administration and Control Programs for Collaboration with Entities that Work to Place Disabled People Protocol against Moral, Sexual, and Gender-Related Harassment Protocol Manual **Reception Orientation Plan** Recognition of ARHOE Safety Instructions regarding Access, Credentials, and Surveillance: (i) staff access to the Museum; (ii) access by suppliers and vendors; (iii) ID cards and accreditation; (iv) permanent posts Security System Maintenance Plan Security Plan Strategic Plan Style Manual System of Universal Accessibility, in accordance with certification ISO 170.001 System of Private-Professional Life Balance, in accordance with the certification as Family-Responsible Organization (EFR) System of Environmental Management, in accordance with certification ISO 14.001 Training Plan Procedure

Visitor Services Manual

Volunteer Program Worker's Health and Safety Committee Works Council