



# CODE OF CONDUCT

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# PREAMBLE: FOR WHOM AND HOW TO USE

## EACH OF US IS ACCOUNTABLE

All IMP and IMBA employees must comply with this Code of Conduct and the internal policies, guidelines, and procedures as well as laws to which it refers.

Transparency is integral to all our actions, including clear communication and documentation, and processes and procedures across all levels shall comply with international and national standards.

As an employee of IMP or IMBA, you must ensure that third parties performing work on your employer's behalf (such as consultants, contract workers, agencies, etc.) and collaborators or scientific contributors also understand and adhere to this Code of Conduct and any applicable internal policies, guidelines, procedures, and laws.

## EACH OF US HAS A VOICE

You may become aware of actions or behaviour that are, or could be perceived to be, not in line with this Code of Conduct, such as wrongdoing, misbehaviour, or dubious practices. In such situations please speak up and report your concern or observation to your supervisor or – as the situation requires – escalate it to a representative of the next management level.

## EACH OF US HAS HELP AVAILABLE

This Code of Conduct serves as a foundation of our work and is intended to support the commitment to scientific and personal integrity. Violations of this Code of Conduct can result in legal consequences and disciplinary action including verbal or written warnings or dismissal.

If you are unsure of what to do in a situation, it is always a good idea to start with your supervisor if you are not comfortable doing so or this option is not available to you, the ombudsperson or PhD student and postdoc representatives (for students and postdocs) will offer advice and refer you to reporting channels and sources for more information.

If you feel that you need professional support with a problem, there is coaching and mental health counselling available on campus and off campus. To ensure compliance with this Code of Conduct and the anti-discrimination policy, each institute has a compliance committee, which is responsible for collecting complaints and coordinating follow-up actions (see annex for further information). IMP and IMBA also maintain respective whistleblowing tools for the anonymous reporting of potential non-compliance. These tools are provided via the institutes' websites.

# OUR CORE PRINCIPLES

## 1) GOOD SCIENTIFIC PRACTICE, INTEGRITY, AND ETHICS

Ethically sound research practices are a foundation of our success with respect to scientific quality. All persons involved in research are obliged to adhere to the standards of good scientific practice, which define the principles of integrity and scientific honesty in research and scholarship. We are committed to the highest international standards of scientific integrity in life sciences and to full compliance with national laws. Scientists shall participate in the further development of research ethics. Senior staff members shall take their function as role model seriously and create a research environment in which compliance with the principles of scientific integrity is clearly communicated to all those involved in research, especially junior researchers.

In all its activities, internal and external, IMBA/IMP and its staff shall ensure that academic freedom is guaranteed, openly represented, and protected. We ensure that scientists can carry out their work in a purely science-driven and impartial manner. We are dedicated to excellence measured at an international level. We strive for achievement and efficiency, and are willing to continuously develop our competencies and skills for the benefit of science and society. Evaluation of scientific achievements is based on international review with several reviewers.

## MY COMMITMENT

I am obliged to work *artis lege*, i.e. to carry out my scientific activities in accordance with legal regulations, ethical standards and the current state of the art of my profession or discipline, to document results and consistently subject all

results to critical analysis, to maintain stringent honesty with regard to contributions by collaborators, competitors, and predecessors, to avoid and prevent scientific misconduct in my work and in my immediate environment, and to comply with the principles and rules described below. I engage in open discourse about methods and views, opportunities and risks including in the context of society as a whole. I will refrain from any action that might harm or contribute to diminishing the scientific integrity of IMP or IMBA.

## 2) ANIMAL RESEARCH

The use of animals in research has facilitated major breakthroughs in medicine that have transformed human and animal health. We support research using animals where alternative methods are not available, where the potential benefits to health are compelling, and where acceptable ethical and welfare standards can be met. We develop training programs to ensure that our personnel acquire the necessary knowledge for handling animals for scientific and research purposes in addition to proper skills and attitudes for animal care and welfare. We ensure that all necessary resources are allocated to properly manage animals including their facilities, husbandry, wellbeing, and veterinary care. We comply with European and national legislation as well as institutional standards of animal care stipulated in accordance with the relevant Austrian legislation. We only select external partners or providers of animals or animal-related services that adhere to the same ethical principles

### MY COMMITMENT

I am committed to the responsible use of animals and to consider good animal welfare as the key pillar of my activities in using animals for research at any time.

I will use suitable animal models to answer pertinent scientific questions only when there is a lack of alternative experimental methods, and I will always strictly abide by the 3R principles - Replacement, Reduction and Refinement - to ensure the ethical and scientific use of animals.

## 3) GENE RESEARCH AND TECHNOLOGY

All research activities involving genetically modified organisms (GMOs), or the modification of the genome must be documented in laboratory notebooks and reported to and approved by the responsible internal and external regulatory bodies. These approvals take various biosafety levels, biocontainment precautions and additional criteria according to the Austrian Gene Technology Act into account.

### MY COMMITMENT

I will handle GMOs in compliance with Austrian law and keep detailed records of the experiments I have conducted. I will ensure that all required safety measures and methods for the harmless disposal of GMOs are strictly adhered to and put in place before I start working with GMOs.

## 4) HUMAN MATERIAL AND STEM CELLS

In order to work with human material, each researcher must comply with relevant institutional human material guidelines, especially regarding the need for patient consent, relevant Ethics Committee or Biosafety Commission approvals, custodianship of samples, and an awareness of any human implications and all legislative requirements. Support and advice on principles and guidelines for the protection of biomaterials obtained from human subjects is given by the Institutional Review Board (IRB).

### MY COMMITMENT

I will take all required actions to ensure the appropriate and responsible use and storage of human biospecimens and associated private data in full compliance with the relevant human material guidelines. I will ensure that my work with human material is strictly based on a written consent of donors and limited to the use of such human material and associated data to what has been permitted and approved by the relevant Ethics Committee. If I experience problems with ethical issues, I will consult the Institutional Review Board.

## 5) ENVIRONMENT, HEALTH, AND SAFETY

In all our activities, we endeavour to protect our employees' health, the environment, and climate from harmful influences. We conserve natural resources and promote awareness. We select collaborators and suppliers who share this commitment. We promote a work culture that maintains physical and mental health. We support the reconciliation of work and private life and create an appropriate work environment that values family life.

### MY COMMITMENT

I will keep myself informed about the latest safety guidelines and procedures for environmental protection at our institutes'. I will take part in all relevant training programmes as identified by the EHS office. I comply with all applicable occupational safety regulations and internal guidelines. I will follow all directions and advice from our EHS safety personnel and, should I notice an opportunity to improve the safety of our operations, I will immediately bring it to the attention of the EHS officer. I will use resources, including the building and facilities, responsibly and consider more sustainable alternatives in my daily work, as well as in my participation in events and conferences.

## 6) RESPONSIBILITY TOWARDS FUNDERS

We use the research budgets and resources that are provided to us by our shareholders or public and private funding organisations in the most economical fashion and based on strict rules to avoid any waste of resources and funds. We invest our funds responsibly and in full compliance with the sponsor's purpose and provisions. We strictly comply with transparency and reporting standards required by our shareholders and funding organisations. We use the institutes' resources responsibly and treat resources with diligence and take care to minimise wear and tear.

### MY COMMITMENT

I will use all research funds and resources provided by my employer or public and private funding organisations in the most economical fashion and in full compliance with internal regulations and all provisions determined by funding organisations. I treat all resources with utmost diligence and care to avoid abrasion and reduce investments into repair and maintenance to a minimum.

## 7) INTERACTION WITH THE PUBLIC

We have worked hard to build a reputation of excellence and integrity. Media representatives and other external observers of our work depend on us to promote relevant, accurate and balanced information, which we are committed to delivering in a professional manner. We have a responsibility to share our work with the public and strive to publish all our scientific discoveries in line with our Open Access Policy and principles of research integrity.

### MY COMMITMENT

I will abide with media guidelines and involve the relevant communications staff in requests by media and external individuals. I fully support the institutes' open access policy and will endeavour to make my scientific findings as accessible as possible (e.g., through appropriate publishing) after screening for patentability has been completed. I exercise good judgment when engaging on social media and I report adverse events I encounter in any social environment.

## 8) PROCUREMENT AND SUPPLIER RELATIONS, CONFLICTS OF INTEREST

Recognising that our suppliers and partners play an important role in our success, we only work with partners that are appropriately selected and which share our commitment to quality, service, and ethical business practices. We conduct all our professional activities in a manner that ensures that decisions are made objectively and free of undue personal, academic, or economic interests. We promote diversity and inclusion in our supply chain by offering opportunities to small and medium-sized businesses and/or diverse-owned businesses where required.



**MY COMMITMENT**

I will always act in the best interests of my employer and will avoid or freely disclose situations that present an actual or perceived conflict between my personal or economic interests and the interests of my employer. I will conduct my work with due diligence to ensure that I cooperate only with reputable and qualified partners. I immediately report suspected violations of human rights such as human trafficking and forced, bonded or child labour, in our relationships with our suppliers or partners/collaborators.

**9) PREVENTION OF BRIBERY AND CORRUPTION**

We do not promise, offer, pay, ask for, or accept anything of sufficient value or use to improperly influence decisions or actions with respect to our professional activities. Third-party contributions, including donations and gifts, made to the IMP or IMBA, whether in the form of money, material assets, or services, shall be made transparent. We will not use our employment at the IMP/IMBA for personal gain. We adhere to the four-eyes principle, and we have internal controls in place to combat money laundering and terrorism financing.

**MY COMMITMENT**

I will refrain from any activities that could lead to actual or perceived inappropriate influence being brought to bear, either directly or indirectly, through third parties. I am committed to strictly separating private and professional interests. Any gifts, invitations, or other economic advantages I receive may only be small in value to not inappropriately influence, or be perceived by others to potentially influence, current or future projects or business cases. In case of doubt, I will consult with my supervisor.

**10) FUNDRAISING AND SPONSORING**

We always act honestly and truthfully so that public trust is protected, and donors and beneficiaries are not misled. We always act with respect for the dignity of our profession and our employer as well as with respect for the dignity of donors and beneficiaries. We act openly and in accordance with our responsibility for public trust. We work in a way that promotes our purpose and encourages others to adopt the same professional standards and commitment.

**MY COMMITMENT**

I respect the fact that all fundraising (e.g., for conference sponsorship) at our institutes is institutionalised and centrally organised. I will not approach potential sponsors individually. Where relevant, I will ensure that sponsorship does not lead to any conflicts of interest (e.g., potential influence on purchasing decisions through sponsorship) and that external funds are spent in line with their intended purpose. I will also refrain from proposing unrealistic returns on any donation or sponsorship.

**11) GENDER AND EQUALITY, FAIR AND RESPECTFUL BEHAVIOUR, DIVERSITY, AND INCLUSION**

We always treat each other and external third parties professionally, with fairness, respect, professional attitude, and dignity, and resolutely oppose any form of discrimination or harassment based on gender, origin, ethnicity, age, religion, ideology, disabilities, socio-economic background, parental status, physical appearance, or sexual orientation. Hires are based on strict quality criteria. We value the diverse individual characteristics, different perspectives, and distinctive background of our staff. We adhere to human rights and international labour standards. We encourage active information sharing, especially to assist colleagues with work processes and practices. We are committed to working actively to achieve gender parity across the organisations and hierarchies. We do not tolerate any form of harassment, bullying, or mobbing. Any employee who has been found to have committed any of the mentioned offenses is liable to verbal or written warnings and dismissal.



**MY COMMITMENT**

In professional interactions, I support my colleagues, respect their individual abilities and needs, appreciate their achievements, and give feedback in a constructive manner. I respect my colleagues' differences, and neither practice nor tolerate any form of discrimination, harassment, or aggression. I treat all colleagues and professional contacts equally and do not tolerate any form of discrimination or harassment based on gender, origin, ethnicity, age, religion, ideology, disabilities, socio-economic background, parental status, physical appearance, or sexual orientation. If I witness any form of harassment, discrimination, bullying or mobbing, I am encouraged to offer my support to the affected person. I will inform them about the support resources available on campus and encourage them to take advantage of this offer.

**12) PERSONAL RELATIONSHIPS AT THE WORKPLACE**

We respect our employees as individuals and treat their social and personal life as private. We do not allow personal matters to affect decision-making or other conduct at the workplace.

**MY COMMITMENT**

I do not let personal circumstances or relationships interfere with my professional abilities; if potential conflicts of interest arise, I will take appropriate steps to keep work requirements and personal circumstances separate. If my personal circumstances or relationships change and cause a conflict of interest, I will notify my supervisor and we will work together to find appropriate solutions.

**13) PRIVACY AND DATA PROTECTION**

We respect the privacy rights of our employees and other professional contacts. We handle personal data in full compliance with the applicable guidelines, laws, and regulations to prevent unauthorised or unlawful use, loss, or damage of personal data and all other data. We collect, use, and retain personal data that is necessary for a specific business purpose. We process personal data fairly, transparently, and on a lawful basis.

**MY COMMITMENT**

I will safeguard the rights of all colleagues, stakeholders, and other professional contacts by protecting their private data from abuse and/or unauthorised access. If I come across any breach of data protection policy, I will immediately inform the relevant data protection officer.

**14) RESPONSIBLE HANDLING OF CORPORATE INFORMATION AND INTELLECTUAL PROPERTY**

Information is one of our most valuable assets. We protect and manage it with care. We maintain confidentiality and obtain, enforce, and defend our intellectual property rights. We control physical access to protect our people, sites, facilities, and information and communication systems. We appropriately use our IT devices, systems, and services consistent with relevant policies and procedures.

**MY COMMITMENT**

I am aware that I am not permitted to disclose confidential information relating to IMP or IMBA, reproduce it or use it for commercial purposes. I will exercise caution when handling confidential information in public places. I use, manage, and protect confidential information appropriately to prevent abuse of such data by unauthorised third parties. I adhere to confidentiality obligations even after my employment relationship has ended.

## 15) POLITICAL ACTIVITIES

We respect and support individuals' rights to participate in political activities outside the workplace using their own resources.

### MY COMMITMENT

I will refrain from pursuing any activities to support any political party, candidates, or initiatives on behalf of my employer. I will not make political statements or engage in political activities on my employer's behalf. When engaging in political activities in a private capacity, I will avoid creating the impression that I am acting or speaking on behalf of my employer.

## 16) LEADERSHIP RESPONSIBILITY

All group leaders, department heads, and facility heads fulfil organisational and supervisory duties and bear responsibility for the staff assigned to them. They are responsible for knowing the legal framework and guidelines relevant for their tasks and will ensure the compliance of these regulations by the staff they supervise. They shall grant staff freedom of action and personal responsibility as well as training and development opportunities. Through appropriate supervision, they should ensure compliance with these by the staff members for whom they are responsible.

### MY COMMITMENT

I will ensure trust-based cooperation with and among staff members, as well as the broadest promotion and development of individual talents and careers. I am aware of my function as a role model and will grant my staff members freedom of action and personal responsibility as well as the opportunity for further training, within the scope of the options available. I am committed to carefully guiding, supporting and supervising junior colleagues and I am responsible for the cost-efficient management of my organisational unit.

## 17) INSIDER TRADING

We work with partners whose shares or securities may be publicly traded. This means we might come across non-public information about these partners (inside information). Using inside information to trade, getting others to trade, or sharing it unlawfully is strictly prohibited.

### MY COMMITMENT

I will keep inside information strictly confidential and only use it only for the purpose it was provided.

## 18) ANTITRUST AND FAIR COMPETITION

We strive to provide scientific freedom and adhere to the standards of good scientific practice. In the process, we always follow all competition and antitrust laws in our professional activities, promoting free and fair competition worldwide. We never pursue a competitive edge through unethical or illegal practices. We avoid anti-competitive agreements with our partners.

### MY COMMITMENT

I gather [competitive] intelligence ethically and in compliance with legal guidelines. We participate in tender procedures in a fair way without any form of manipulation.

## WHEN IN DOUBT

No document can cover every situation that you may encounter or every policy that may apply to you and your work; moreover, it cannot be a substitute for good judgment. There are times when you may be unsure what to do, or certain issues that may not be immediately apparent or clear. In these situations, please refer to the documents provided as Annex to this Code of Conduct and ask yourself the following questions before making a decision or choosing a course of action:

- Is it legal?
- Does it comply with this Code of Conduct and respective company policies and guidelines?
- Would I feel comfortable if it was made public?

If you can truthfully answer all these questions in the affirmative, then you do not need to be in doubt. If you are unable to answer any of these questions in the affirmative or if you are unsure, please consult with your supervisor or - as the situation requires – escalate the matter to the next management level.

## QUESTIONS?

If you have questions regarding specific aspects of this Code of Conduct, we encourage you to approach the competent specialists at your respective institute. Contact information is given in an annex to this document.

