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## DOCUMENT DETAILS

<b>Document</b>	<b>Code of Conduct</b>
<b>Description</b>	<b>IrsiCaixa Code of Conduct</b>
<b>Company</b>	IRSICAIXA
<b>Purpose</b>	To establish the ethical principles underpinning entity activities and actions
<b>Classification</b>	INTERNAL DOCUMENT
<b>Author</b>	Ribas y Asociados

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Document author:  
Xavier Ribas

**ribasyasociados**

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## INTRODUCTION

The IrsiCaixa AIDS Research Institute (hereinafter IrsiCaixa) is a private foundation and an international reference institute whose objective is to contribute to improving knowledge, preventing and treating HIV infection and AIDS with the ultimate goal of eradicating the epidemic.

This Code of Conduct establishes standards of ethical behaviour by means of principles to be applied in all areas of IrsiCaixa's activities, thereby ensuring a culture of ethical compliance based on the promotion of good practices.

The principles of this Code of Conduct apply to all persons who are members of IrsiCaixa governing bodies and all IrsiCaixa employees, but also to all third parties with whom the IrsiCaixa Foundation has contact.

The objective of this Code of Conduct is to ensure professional, ethical and responsible behaviour in persons associated with IrsiCaixa.

This commitment, rather than constituting a mere declaration of principles, applies to daily practice and is integrated in routine Foundation management. It represents an undertaking to comply with the law and with the ethical values promoted by the Foundation.

This Code of Conduct has been drawn up taking into account national and international recommendations on good governance of non-profit entities and the principles of foundational social responsibility underpinning IrsiCaixa. It also covers and is aligned with the values and principles of Catalan Research Centre Institution (CERCA), as well as with recent reforms to the Criminal Code regarding crime prevention and the criminal liability of legal persons.

Regulatory compliance should not be limited solely to compliance with the law. Ethical behaviour is the basis for all Foundation decisions and actions that will ensure integrity. This integrity, along with transparency, is also required in third parties with relationships with the Foundation.

The Code of Conduct is part of IrsiCaixa regulations and will be published on the institutional website in application of its transparency policy. It should be translated as necessary so that all members, employees and third parties understand its scope and content.

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## 01 SCOPE

- 0101 **Corporate scope.** This Code of Conduct shall apply to all persons associated directly with IrsiCaixa, including members of the Board of Trustees and Executive Committee, managers, professionals and employees in general, irrespective of their hierarchical level, functional location or legal association with the Foundation, whether in the form of an employment, training or conventional contract or based on visiting scientist credentials.
- 0102 **Personal scope.** Foundations and other entities shall observe the Code of Conduct in the exercise of their activities and shall promote the application of the mission, purposes, values and norms of conduct of the Foundation in any organizations, associations, foundations or other entities with which they collaborate.
- 0103 **Relational scope.** The Code of Conduct shall extend to collaborating entities, suppliers, external staff and, in general, to all agents involved in IrsiCaixa activities whose illicit or unethical practices may affect or be attributed to the Foundation. It shall also apply to all entities over which IrsiCaixa has effective control or in which it has administrative or governance roles.
- 0104 Compliance is understood without prejudice to strict compliance with statutes and other regulations in force in the Foundation, as well as regulations that are applicable as a consequence of membership of CERCA.

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## 02 GENERAL PRINCIPLES

0201 This Code of Conduct is based on the following principles:

- a) **PRINCIPLE OF GOOD GOVERNANCE.** The Foundation is committed to national and international recommendations on good governance of non-profit entities, as well as to the principles of foundational social responsibility and the principles of ethics and transparency in all its activities.
- b) **PRINCIPLE OF GOOD FAITH.** All members and employees shall act loyally, honestly and in good faith, avoiding any deceit, malice or negligence in their actions regarding both the Foundation and its members.
- c) **PRINCIPLE OF COMMITMENT TO CONSTITUTIONAL RIGHTS.** IrsiCaixa expresses its commitment to established constitutional rights applying in scope and content to the workplace, including the rights of expression, association, privacy and image, the confidentiality of communications and the dignity of workers.
- d) **PRINCIPLE OF SOCIAL COMMITMENT.** The Foundation permanently seeks to fulfil its undertaking, to maintain and empower its firm belief in its project and to improve day by day. Values, ethical commitment and excellent treatment of its people complete and define the work culture of the Foundation.
- e) **PRINCIPLE OF PERSONAL, FAMILY AND WORKING LIFE RECONCILIATION.** The Foundation respects the personal and family life of its employees and shall promote actions that facilitate responsible balance between personal and working life.
- f) **PRINCIPLE OF EQUAL OPPORTUNITIES.** The Foundation will ensure equal treatment between men and women in terms of working conditions, access to employment and training and promotion. This principle also applies to public tenders for the acquisition of goods and services.
- g) **PRINCIPLE OF PUBLIC INTEREST.** All actions shall be conducted in a way that pursues the general interest over self-interest while avoiding the private use of public resources.
- h) **PRINCIPLE OF PRIVACY.** The rights to privacy of the Foundation's members and employees and especially of personal, medical and financial data shall be respected. No personal data may be disclosed except when the consent of the interested parties has been granted and in cases of legal obligation or compliance with judicial or administrative decisions. Under no circumstances may the personal data of members and employees be processed for purposes other than as legally or contractually envisaged. Members and employees who access the personal data of others are bound by the confidentiality clause and undertake to keep confidential data secret.
- i) **PRINCIPLE OF LEGALITY.** IrsiCaixa undertakes to fully comply with applicable laws, rules and regulations and with the principles of this Code of Conduct and internal policies and procedures. Members and employees shall, in their actions, decisions and statements, absolutely respect laws, rules and regulations. They may not apply personal interpretations that could distort those laws, rules and regulations but should request external guidance in the event of doubts about compliance and applicability. IrsiCaixa members and employees shall behave in accordance with the spirit and letter of this Code of Conduct.

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- j) **PRINCIPLE OF POLITICAL NEUTRALITY.** The Foundation does not subscribe to any political ideology or tendency. Consequently, without prejudice to the constitutional rights of freedom of expression and ideological freedom, any behaviour or practice that associates or may associate the Foundation with any specific political current shall be rejected. Any membership, collaboration or other kind of association with political parties or with other types of entities, institutions or associations for public purposes shall be such that their personal nature is clear and not associated in any way with the Foundation.
- k) **PRINCIPLE OF NON-DISCRIMINATION.** The Foundation promotes, as well as equality of opportunities, non-discrimination based on race, nationality, racial origin, age, sex, marital status, sexual orientation, ideology, political opinions, religion and any other personal, physical or social condition of its members and employees. IrsiCaixa rejects any manifestation of violence or of physical, sexual, psychological, moral or other harassment that generates an intimidating or offensive environment for its members and employees and will, furthermore, adopt any measures necessary to prevent or terminate such conduct once detected.
- l) **PRINCIPLE OF PROFESSIONALISM.** Researchers, technicians and management shall apply objective professional criteria in all their actions, with the diligence necessary to guarantee excellence in both the scientific and management areas.
- m) **PRINCIPLE OF ENVIRONMENTAL RESPECT.** All IrsiCaixa activities shall be carried out respecting the environment and minimizing environmental harm by efficiently managing waste, saving energy and evaluating the environmental impact of projects.
- n) **PRINCIPLE OF RESPONSIBILITY.** Foundation members and employees shall be responsible for their actions, decisions and statements within the workplace and shall carry out their tasks with integrity and responsibility.
- o) **PRINCIPLE OF HEALTH AND SAFETY AT WORK.** The Foundation promotes health and safety at work as an essential element of its activity and implements preventive measures as established in the ruling legislation or as may be established in the future, ensuring that they are observed in order to avoid risks to collective or public health as well as to members and employees.
- p) **PRINCIPLE OF TRANSPARENCY.** In its teaching and research activities, IrsiCaixa demands the highest standards of transparency and academic rigour. Consequently, results adulteration, mendacious concealment or undue bias in modifying conclusions are strictly prohibited. Loyalty and transparency are central tenets governing IrsiCaixa's compliance with standards.
- q) **PRINCIPLES OF SCIENTIFIC INTEGRITY.** Data, materials and substances shall be processed in accordance with the principles and values established in the CERCA Code of Ethics.

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## 03 RELATIONAL SCOPE

### 0301 Relationship with employees

IrsiCaixa considers people to be a key factor in the Foundation and, therefore, defends and promotes compliance with human and labour rights and is committed to the implementation of regulations and good employment and workplace health and safety practices.

All members, employees and collaborators shall respect internal safety guidelines and regulations issued by the Quality and Work Safety Area of IrsiCaixa, as well as those established in occupational risk prevention legislation.

IrsiCaixa guarantees all its members and employees the rights contemplated in the Workers' Statute as well as any other rights deriving from specific employment contracts.

Under no circumstances shall employment or Social Security conditions be imposed in IrsiCaixa that violate, suppress or restrict the rights of employees recognized by law, in collective agreements or in individual contracts.

All IrsiCaixa employees shall undertake their work in safe and healthy settings and will be provided with the necessary personal protective equipment (PPE) to carry out their work without risk. The withdrawal or neutralization of any security measure implemented in the workplace is totally forbidden. All premises and mechanical devices shall be monitored in terms of installation, use, maintenance and repair to ensure they comply with applicable regulations and that they pose no risk to the health of members, employees, collaborators or third parties.

Employees, in their workplace relations with other employees, shall act according to the criteria of respect, dignity and justice, taking into account different cultural sensitivities and not tolerating any form of violence, harassment or abuse at work, nor discrimination based on race, religion, age, nationality, gender or any other personal or social condition unrelated to merit and ability, with special consideration for the care and integration of people with disabilities or handicaps. No form of harassment of employees or collaborators shall be tolerated.

IrsiCaixa employees may not undertake any professional activities unrelated to those carried out at IrsiCaixa when these diminish the performance of their duties in IrsiCaixa. Any professional activity that may affect their work or the interests of the Foundation must be previously authorized by the Ethics Committee.

Non-national employees may not be hired without first having obtained the corresponding work authorization and techniques to simulate contracts or placements may not be used.

The procedure for hiring staff must guarantee the veracity of the job offer. Under no circumstances may false or misleading work conditions be offered.

### 0302 Relationship with suppliers

Document author: Xavier Ribas	<b>ribasyasociados</b>
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IrsiCaixa staff shall interact with suppliers of goods and services in a lawful, ethical and respectful manner. Transactions with suppliers shall be carried out according to objective, impartial criteria that guarantee equal opportunities and avoid favourable treatment and conflicts of interest in supplier selection processes.

IrsiCaixa members and employees may not offer, promise or provide any kind of gifts, commissions or advantages from companies or institutions with which IrsiCaixa has a relationship and which may improperly influence their decision-making processes.

Members and employees of IrsiCaixa may not accept or receive gifts, invitations or payments in kind, beyond mere gestures of courtesy, from companies, institutions or suppliers.

IrsiCaixa requires from its suppliers a level of commitment to socially responsible practices compatible with this Code of Conduct.

Members and employees may not participate in or influence procedures for contracting products or services from companies or persons with whom they have a financial or family tie. Such circumstances must be brought to the notice of the Ethics Committee as soon as they are known.

All requests for external procurement and purchases must be undertaken with maximum transparency and must avoid any favourable treatment.

### 0303 Relationship with public and private institutions

Relations with the authorities, regulatory bodies and public administrations shall be approached according to the principles of cooperation and transparency. IrsiCaixa members and employees shall interact with such bodies in a legal and ethical manner, respecting laws aimed at preventing corruption and bribery.

No employee of IrsiCaixa may offer, grant, request or accept, directly or indirectly, any gift, favour or compensation of whatever nature from authorities or public officials.

No employee of IrsiCaixa may facilitate or streamline procedures by paying money or offering objects of value in exchange for ensuring or expediting a procedure or action of any nature before a judicial body, public administration body or other official body.

Members and employees will refrain from obtaining undue advantage for IrsiCaixa in tax matters and will ensure that tax information declared to the authorities is true and faithfully reflects the circumstances of the Foundation.

All documentation and information sent to public or private authorities in order to obtain financing, funds, grants or subsidies must be honest and truthful and must not deliberately overlook relevant data or information. Likewise, IrsiCaixa will ensure that funding requested or received from public administration bodies shall be properly used and shall not be used for a purpose other than that for which it was granted.

IrsiCaixa vehemently vetoes the fraudulent act known as "double financing" (not to be confused with concurrent financing). Double financing consists of claiming for the same item of expenditure (a specific

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cost) from different subsidizing bodies separately (whether EU, national or regional) such that the same cost is funded twice by public funds. This is clearly illegal and involves fraudulent use of public money.

#### **0304 Relationship with the media and misleading publicity**

Foundation members and employees undertake to develop a dignified, respectful and truthful relationship with persons working in the communications media.

No member or employee may disclose any kind of misleading information that in any way induces or misleads recipients.

Information disseminated to the media shall be truthful and transparent and shall respect the privacy of individuals and the confidentiality of their data. Likewise, there must be no misleading or denigrating publicity regarding competitors or third parties.

All information and knowledge generated within the scope of the Foundation is owned by IrsiCaixa under the terms established by the current legislation.

#### **0305 Relationship with political parties**

Except in the execution of agreements adopted by the Board, which shall always respect the principles and guidelines of the Code of Conduct, employees shall refrain from making contributions, including loans or advances, for the Foundation to political parties, authorities, agencies, public administrations or institutions in general.

Employee association, membership or collaboration with political parties or with other types of entities, institutions or associations for public purposes shall be such that their personal nature is clear and not associated in any way with the Foundation.

Before making a donation to any NGO and before participating in sponsorship, patronage or any other social, cultural, scientific, charitable, sporting or similar project, IrsiCaixa will implement a protocol to verify the real destination of the funds.

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## 04 CONFLICTS OF INTEREST

0401 IrsiCaixa members and employees shall avoid situations that may involve any conflict between their own personal interests and those of the Foundation.

0402 A conflict of interest exists when the personal interests of the individual linked to the Foundation and the interests of the Foundation directly or indirectly collide. This applies when the matter concerns the individual directly or concerns a person linked to them.

0403 All members and employees have the obligation to promote the interests of IrsiCaixa and are prohibited from benefiting personally or benefiting third parties with opportunities arising through IrsiCaixa information available to them. Members and employees may not receive, request or accept, themselves or through an intermediary, any benefit, advantage, offer or promise that unduly favours another in acquisitions, sales, the contracting of services or other commercial relationships.

0404 IrsiCaixa members and employees shall refrain from any kind of disloyal action that places it in a position of advantage in the market.

### 0405 **Associated persons**

For the purposes of this Code of Conduct, the following shall be considered as natural or legal persons linked to members and employees:

- a) Spouse or partner or person in an analogous affective relationship
- b) Ascendants, descendants and siblings (and persons in analogous affective relationships)
- c) The spouses or partners (and persons in analogous affective relationships) of ascendants, descendants and siblings.
- d) Entities in which the member or employee or a relation, themselves or through an intermediary, hold or have held in the two years immediately prior to association with IrsiCaixa, any of the control positions established by law.
- e) Entities in which a member or employee or their relations, themselves or through an intermediary, in the two years immediately prior to their association with IrsiCaixa, exercises or has exercised a position as administrator or manager or who receives or has received emoluments for any reason, provided that, in addition, in the two years immediately prior to their association with IrsiCaixa, the member or employee directly or indirectly exercises or has exercised significant influence on the financial and operating decisions of said companies or entities.

### 0406 **In the event of a conflict of interest**

In relation to possible conflicts of interest, members and employees shall observe the following rules of action:

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- a) Independence: Act at all times with professionalism and loyalty to the Foundation, independently of one's own interests or those of third parties. Consequently, in all cases refrain from giving priority to one's own interests at the expense of those of the Foundation.
- b) Abstention: Refrain from intervening in or influencing decision-making that may affect the Foundation in which there is a conflict of interest, from participating in the meetings in which said decisions are made and from accessing confidential information related to said conflict.
- c) Any possible or probable conflict of interests must be communicated in writing to the immediate superior who will inform management of the Foundation for its communication to the governing bodies.

This communication must indicate:

- a) If the conflict of interest affects one personally or occurs through an associated person, in which case that person should be identified.
- b) The situation that gives rise to the conflict of interest, detailing the object and the main conditions of the operation or projected decision.
- c) The measures adopted to avoid the conflict and safeguard the general interest.

These general principles of action shall be observed most particularly in cases in which the conflict of interest is, or can reasonably be expected to be, of such a nature that it constitutes a structural and permanent situation, for instance, in relation to the contracting of goods and services and the recruitment and hiring of staff. Such matters must be submitted, in any case, for deliberation by a plenary session of the Board, whose decision will be binding.

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## 05 INFORMATION PROCESSING

- 0501 Non-public information owned by the Foundation shall be treated as confidential. IrsiCaixa members and employees are obliged to protect all scientific, technical, commercial and financial information of the Foundation as well as the personal data of third parties available to them. They undertake, moreover, to maintain the confidentiality of any information to which they have access and to maintain professional secrecy at all times in accordance with the current legislation. The obligation of confidentiality continues even after a position has been vacated.
- 0502 IrsiCaixa is obliged to protect the personal data of all IrsiCaixa members and employees as well as of the third parties linked to it. To this end, it undertakes to adopt the necessary measures to ensure that information is protected, whatever its physical or electronic format, and is safeguarded against any internal or external risk of non-authorized access, manipulation or destruction, whether deliberate or accidental.
- 0503 In the event of termination of a relationship with IrsiCaixa, all information must be returned, including confidential documents, storage media and devices and information stored in computer terminals. The obligation of confidentiality continues even after the relationship has ended.

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## 06 CORPORATE IMAGE AND REPUTATION

- 0601 IrsiCaixa members and employees shall use the institutional name only for legitimate purposes in the institution's interests. Thus, for example, the IrsiCaixa name may not be used to sponsor or recommend commercial services or products, even when there is no express interest in the company that markets those services or products.
- 0602 Any member or employee who leaves IrsiCaixa or establishes a spin-off or new entity may not use the name, corporate image or factors alluding to IrsiCaixa without the express written consent of the Foundation.
- 0603 The irruption of the Internet and Web 2.0 has led to a progressive blurring between the private and institutional spheres of natural persons. Widely reported in the press are stories in which opinions expressed in the social media by a person linked to an institution, company or communication medium cause de facto repercussions for the organization. Consequently, IrsiCaixa members and employees acting in their own name in their own profiles in social media, blogs, etc shall avoid making comments or spreading rumours that could place the public image of IrsiCaixa at risk.

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## 07 USE OF ASSETS

- 0701 The Foundation undertakes to make available necessary and suitable resources and means for the development of the professional activities of its members and employees. IrsiCaixa is owner of the property and rights of use and exploitation of information technology (IT) systems, computer programs, equipment, manuals, videos, projects, studies, reports and other works and rights created, developed, perfected or used by its members and employees within the framework of their activities or based on the IT systems and equipment of the Foundation.
- 0702 In using the computer equipment, systems and programs that the Foundation makes available to members and employees for the development of their work, and including access and operations on the Internet, members and employees shall comply with security and efficiency criteria and shall avoid any use, action or IT function that is illegal or contrary to the rules or instructions of the Foundation.
- 0703 Members and employees undertake to make responsible use of the resources and the means at their disposal and to only use them for their professional activities on behalf of the Foundation. The use of those resources and means does not imply any expectation of privacy if their use has to be overseen by the Foundation.
- 0704 IrsiCaixa members and employees shall respect the principle of confidentiality regarding the technological knowledge, rights, licenses, programs and systems whose ownership and rights of exploitation or use correspond to the Foundation. Any information or disclosure in relation to the IT systems of the Foundation shall require the prior authorization of the Ethics Committee.
- 0705 Members and employees may not exploit, reproduce, replicate or assign use of the IT systems and applications of the Foundation for non-intended purposes. Likewise, they may not install or use programs or applications in the Foundation's IT system that are illegal or that may damage systems or harm the image or interests of the Foundation or of third parties.
- 0706 Given the exposure risk of computer files to piracy, infection with viruses and other similar risks, members and employees are obliged to respect the security standards established by the IT area and included in the IrsiCaixa risk prevention programme. All staff undertake to retain their personal access codes for their own exclusive use and under no circumstances may they assign their use to third parties.
- 0707 Members and employees should not have any expectations of privacy in the use of corporate resources.

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## 08 ACCESS TO ASSETS

- 0801 Computer media, including hardware, installed software and their content, and electronic mail are work tools owned by the Foundation and, as such, are intended strictly for professional use for entrusted assignments.
- 0802 The Foundation expressly authorizes, as its entitlement, the implementation of the controls it deems necessary regarding the use of resources and means available to members and employees. This includes access to the content of electronic mail and any files stored on computers, as such content is considered, for all intents and purposes, to be documentation belonging to IrsiCaixa.
- 0803 At all levels of IrsiCaixa, prevention and control will be ensured regarding crimes that may be committed against the IT system, such as denial of service attacks, industrial espionage through the Internet, etc.

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## 09 GIFTS

- 0901 In the exercise of their work or responsibilities, Foundation members and employees and persons associated with them may not give or accept gifts of such relevance that they are likely to constitute a conflict of interest in that they affect a person's freedom and independence to act.
- 0902 Foundation members and employees shall reject any gifts they receive, delivering them to their superior for appropriate measures to be taken according to internal procedures.

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## 10 TRANSPARENCY

- 1001 The relationships of the Foundation with suppliers and public administration bodies shall be governed by the principles of cooperation and transparency.
- 1002 The Foundation will truthfully, fully, usefully and consistently provide information on its purposes, activities and projects. The actions of the Foundation's members and employees shall be governed by transparency in information as a basic principle.
- 1003 The economic-financial information of the Foundation shall faithfully reflect its economic and financial status, in accordance with generally accepted accounting principles. Annual accounts will be externally audited, without prejudice to compliance with legal obligations.
- 1004 IrsiCaixa will ensure the correct management of its activities, ensuring no infringements or excesses that harm third parties, and, accordingly, will be extremely diligent in its relations with public officials and entities, whether of the EU or third countries, to avoid incorrect management of their financial interests. It will proceed under the same principles in its relations with third parties or individuals.
- 1005 IrsiCaixa vehemently rejects, in its relations with suppliers, authorities, etc, any practices that may be considered irregular, including those related to tax fraud, money laundering and the financing of terrorism.
- 1006 In the interest of ensuring transparency, the following information is published in the institutional website: this Code of Conduct, statutes, annual accounts, scientific report and other information of relevance for transparency purposes.

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## 11 INTELLECTUAL AND INDUSTRIAL PROPERTY RIGHTS

- 1101 IrsiCaixa is committed to the protection of its own and others' intellectual and industrial property rights.
- 1102 IrsiCaixa members and employees are forbidden to use any distinctive signs of intellectual and industrial property rights belonging to third parties without evidence of having the corresponding rights or licences. They will, furthermore, adopt the necessary measures to protect intellectual and industrial property rights, ensuring that the corresponding processes and decision-making are traceable.
- 1103 Collaborators are required to always respect the scientific authorship of others.
- 1104 Publications and results produced by IrsiCaixa will be disseminated and shall always faithfully reflect the real contributions of researchers and other participants, exclusively according to criteria of merit and effective dedication.
- 1105 Members and employees shall pay special attention to content and programs downloaded from the Internet, even if obtained through search engines such as Google, to ensure that they are licensed by the owner of the intellectual property rights. All programs installed in the computers and mobile devices belonging to the Foundation must be licensed for use unless the software is free, which, by definition, means that it is exempt from this requirement.
- 1106 Trademarks, patents, industrial designs, domain names and other intangible assets protected by industrial property rights shall have the same protection.

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## 12 FINANCIAL INTEGRITY

- 1201 IrsiCaixa shall be governed by generally accepted accounting principles. It is consequently forbidden to in any way prevent or obstruct the verification and evaluation tasks of the company entrusted with the auditing of financial statements.
- 1202 IrsiCaixa will comply punctually with its tax obligations with the Social Security and both the state Treasury and the EU Treasury.
- 1203 IrsiCaixa accounting must faithfully reflect its financial situation, including all revenues and payments. No contrivance aimed at concealing revenues or profits shall be allowed.
- 1204 At all levels of IrsiCaixa, attention will be paid to any customer or supplier who attempts to use IrsiCaixa for money laundering operations. Any suspicion of a risk of this happening must be communicated immediately through the channels enabled for this purpose. Likewise, any transaction or payment to an organization or entity that may be associated with the funding of terrorist activities must also be communicated.
- 1205 IrsiCaixa will not use, sell or distribute knowingly, or import or export to Spain or any other Member State of the EU false or altered currency. Money and currency are understood to be the currency intended for legal tender, whether national, EU or foreign.

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## 13 RESPECT FOR PRIVACY

- 1301 IrsiCaixa shall respect the right to privacy, in all its manifestations, of its members and employees, most especially in regard to personal, medical and financial data, and will respect personal communications through the Internet and other means of communication.
- 1302 No personal data shall be disclosed by the Foundation except when the consent of the interested parties has been granted and in cases of legal obligation or compliance with judicial or administrative decisions. Under no circumstances may the personal data of members and employees be processed for purposes other than as legally or contractually envisaged.
- 1303 IrsiCaixa will control the channels through which personal data are collected and will ensure that it complies with the applicable legislation. Data will be stored with the security measures that correspond to their nature.

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## 14 COMPLIANCE

1401 This Code of Conduct is an internal regulation of mandatory compliance for all members and employees of the Foundation, regardless of their hierarchical level or seniority or their function within the Foundation. Likewise, third parties with relationships with IrsiCaixa shall read and respect this Code of Conduct in their relations with the Foundation.

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## 15 COMMUNICATIONS CHANNEL

- 1501 IrsiCaixa members and employees have at their disposal a communications channel where they are obliged to disclose, confidentially but not anonymously, any contraventions of the principles contained in this Code of Conduct, any behaviour contrary to current legislation, including that governing the prevention of criminal risk. Such communications should be addressed to the following email: [canaldecomunicaciones@irsicaixa.es](mailto:canaldecomunicaciones@irsicaixa.es)
- 1502 Members and employees who become aware of illegal or irregular conduct and who fail to communicate it will be subject to sanctions.
- 1503 Any behaviours that contravene the law or the provisions of this Code of Conduct will result in the application of disciplinary measures as provided for in the corresponding legislation and regulations governing members and employees of the Foundation, In the case of external personnel, contraventions will give rise to measures as deemed necessary according to the criterion of proportionality that guarantees compliance with the Code of Conduct.
- 1504 IrsiCaixa members and employees must communicate any change in their professional situation or change of any other nature that may affect the normal performance of their duties. They must also communicate the commencement, progress and result of any criminal or administrative judicial procedure in which they are being investigated or are accused and that may affect the exercise of their functions in the Foundation or harm the image or interests of the Foundation.
- 1505 The communications channel should only be used for irregular or illicit conduct that constitutes a criminal offence or a contravention of this Code of Conduct.
- 1506 The communications channel may not be used to report, for instance, the following: human resource issues, defects in work equipment, requests for office material, complaints, opinions, etc and issues of a similar nature.

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## 16 PROHIBITION OF RETALIATION

1601 IrsiCaixa will ensure that no collaborator who has reported an incident in good faith is punished in any way. Retaliation of any kind, furthermore, is a serious deontological violation that must be reported as soon as possible.

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## 17 APPROVAL

1701 This Code of Conduct was approved by the Board of Trustees on 25 June 2019 and will remain in force until approval of any new modifications or revisions. Any modification or revision will be suitably notified to Foundation members and employees and shall be made available to all persons, entities or bodies with a relationship with the Foundation.