



---

# Compliance Manual

**Version 24.03.2025**

---

# 1 CONTENTS

---

<b>1</b>	<b>CONTENTS.....</b>	<b>1</b>
<b>2</b>	<b>INTRODUCTION.....</b>	<b>3</b>
<b>3</b>	<b>GENERAL PRINCIPLES .....</b>	<b>4</b>
3.1	What is compliance? .....	4
3.2	What are the objectives of the compliance guideline? .....	4
3.3	Who does the compliance guideline apply to? .....	4
3.4	What values and principles are important to FFoQSI?.....	5
3.5	What is the legal basis for FFoQSI's activities? .....	6
3.6	Is adherence to the compliance guideline an official duty? .....	7
3.7	Who is responsible for adherence to the compliance guideline? .....	7
3.8	How are the provisions of this manual to be understood?.....	8
<b>4</b>	<b>COMPLIANCE BOARD .....</b>	<b>9</b>
4.1	What is the Compliance Board and how does it work? .....	9
4.2	When should the Compliance Board be consulted? .....	9
4.3	How does the Compliance Board proceed? .....	10
4.4	Who does the Compliance Board report to? .....	10
<b>5</b>	<b>INTERNAL PRINCIPLES OF CONDUCT .....</b>	<b>12</b>
5.1	How do I behave as a FFoQSI member in accordance with the law and regulations? .....	12
5.2	How is the chain of command structured in FFoQSI? .....	12
5.3	What duties do line managers have? .....	12
<b>6</b>	<b>DEALING WITH BUSINESS PARTNERS AND THIRD PARTIES .....</b>	<b>14</b>
6.1	What values are important when dealing with business partners and third parties? .....	14
6.2	What principles does FFoQSI follow to prevent corruption? .....	14
6.3	How does FFoQSI fight corruption? .....	15
6.4	What measures does FFoQSI take to prevent money laundering?.....	15
6.5	Why is FFoQSI committed to fair competition? .....	15
<b>7</b>	<b>DEALING WITH BENEFITS .....</b>	<b>16</b>
7.1	How should donations to FFoQSI be handled?.....	16
7.2	What are the rules regarding benefits to FFoQSI employees? .....	16
7.3	How are donations to third parties regulated?.....	16
7.4	What should I bear in mind when participating in events? .....	17
7.5	How should invitations be handled?.....	18
7.6	How should cost reimbursements, compensation and bonuses be handled? .....	18
7.7	How to deal with grants, prizes and awards? .....	19
7.8	How does FFoQSI deal with sponsoring and other donations? .....	19
7.9	When is sponsorship permissible?.....	19
7.10	How should offers for discounts and bonuses be handled? .....	20
7.11	Are donations to political parties permitted? .....	20
7.12	Are other benefits permitted?.....	20

<b>8</b>	<b>DEALING WITH COMPANY INFORMATION .....</b>	<b>21</b>
8.1	What is a trade secret? .....	21
8.2	How do I handle confidential information? .....	22
8.3	What sanctions are provided for misuse? .....	23
8.4	How should personal data be handled? .....	24
8.5	How should personal data be protected? .....	24
<b>9</b>	<b>DEALING WITH CONFLICTS OF INTEREST .....</b>	<b>25</b>
9.1	Why is the separation and disclosure of private and business interests important to FFoQSI? .....	25
9.2	How can a conflict of interest arise and how should it be dealt with? .....	25
9.3	What rules apply to secondary employment .....	26
9.4	What needs to be considered when appointing an expert?.....	26
9.5	What to do in the event of conflicts of interest? .....	27
<b>10</b>	<b>SOCIAL RESPONSIBILITY .....</b>	<b>28</b>
10.1	How FFoQSI researchers assume responsibility towards society .....	29
10.2	Are employees allowed to be politically active? .....	29
10.3	How does FFoQSI conserve and protect environmental resources? .....	29
10.4	How does FFoQSI protect intellectual property?.....	30
10.5	How are decision-making/-processes characterized in FFoQSI?.....	30
10.6	Why are accurate records and financial integrity important to FFoQSI? .....	30
<b>11</b>	<b>OCCUPATIONAL HEALTH AND SAFETY .....</b>	<b>31</b>
11.1	Why are alcohol and drugs taboo in the workplace? .....	31
11.2	What rules must be observed when using infrastructure?.....	31
<b>12</b>	<b>REPORTING MISCONDUCT AND SANCTIONS .....</b>	<b>33</b>
12.1	What sanctions are provided for breaches of compliance? .....	33

## 2 INTRODUCTION

---

Dear colleagues,

As an interdisciplinary research center in an academic environment, FFoQSI GmbH (hereinafter referred to as "FFoQSI") works closely with universities and companies along the value chain in the feed and food industry. As part of our research, we strive to find innovative solutions for current and future issues in science, business and society.

In order to achieve optimal cooperation with each other, as well as with external persons, companies, authorities, etc., it is important to comply with laws, internal regulations and ethical principles.

Due to the special shareholder situation of FFoQSI (FFoQSI is owned by three academic institutions), FFoQSI is subject to auditing by the Austrian Court of Audit. FFoQSI employees are public officials within the meaning of the provisions of criminal law on corruption. Public officials ieS means that FFoQSI employees are subject to the strictest corruption regulations.

This compliance handbook is intended to help you gain an overview and at the same time encourage you to implement the rules and principles courageously and independently. Of course, the compliance guideline also provides answers to frequently asked questions and serves as a point of contact for your assistance.

Our aim is to work together in a collegial, respectful and honest manner while complying with legal requirements and rules.

With best regards

Dr. Jürgen Marchart  
(Managing Director)

## **3 GENERAL PRINCIPLES**

---

### **3.1 WHAT IS COMPLIANCE?**

One of the more official translations of compliance is "conduct in accordance with applicable law". Compliance deals with the question of how to ensure adherence to the company's internal guidelines and rules of conduct as well as legal regulations within FFoQSI, including the handling of all measures for early risk detection and prevention as well as risk minimization.

As FFoQSI is a public sector company whose owners are universities and universities of applied sciences and which is financed to a considerable extent by public funds, the issue of compliance and corruption prevention is of particular importance.

### **3.2 WHAT ARE THE OBJECTIVES OF THE COMPLIANCE GUIDELINE?**

This compliance guideline is intended to explicitly anchor FFoQSI's self-image of behaving in an ethically and legally correct manner. The guideline aims to inform and instruct FFoQSI employees, business partners and third parties and focuses on prevention, transparency and reaction in order to achieve these goals.

This is intended to ensure that FFoQSI employees comply not only with the legal requirements and prohibitions in their respective areas of work, but also with FFoQSI's internal instructions and guidelines and the associated socially recognized values.

The aim of the compliance guideline is,

- to raise awareness of the basic rules and principles of conduct for the behavior of all FFoQSI employees within FFoQSI and in relationships with business partners and third parties;
- to ensure the transparency and traceability of decision-making processes both externally and internally;
- to strengthen socially responsible behavior, integrity, awareness-raising and social responsibility;
- actively support the prevention of and fight against corruption;
- to sensitize all FFoQSI employees, regardless of their position in the company, to correct and respectful interaction with one another.

### **3.3 WHO DOES THE COMPLIANCE GUIDELINE APPLY TO?**

Every person employed, working or commissioned by FFoQSI - regardless of their qualifications under employment law - influences the reputation of the company in both positive and negative ways through their actions.

This guideline therefore addresses all persons employed or working for and commissioned by FFoQSI. They are hereinafter referred to as FFoQSI employees regardless of the legal nature of their employment or commissioning relationship and their position in the company. For employees of FFoQSI GmbH, the guideline is binding in the sense of a service instruction.

The target group also includes:

- Members of the corporate bodies of FFoQSI GmbH
- FFoQSI Managers
- Project managers and working group leaders
- University employees working with FFoQSI on projects, regardless of their employment status at the respective university (e.g. key researchers) and students (e.g. interns, Masters, doctoral and PhD students)
- Third parties, insofar as they are permanently or regularly in a contractual relationship with FFoQSI
- Personnel of other employers who perform or take over FFoQSI tasks on the basis of contractual agreements

Furthermore, it is in the interest of FFoQSI that this guideline is also brought to the attention of FFoQSI business partners.

### 3.4 WHAT VALUES AND PRINCIPLES ARE IMPORTANT TO FFOQSI?

As a public company, FFoQSI is committed to its values and principles. They form the basis for the company's activities.

FFoQSI respects the personal dignity, privacy and personal rights of each individual and works with individuals of different ethnic origin, culture, religion, age, regardless of disability, skin color, sexual identity, ideology and gender. Unobjective preferential treatment or discrimination, as well as support and toleration thereof, are not permitted under any circumstances.

At FFoQSI, the working atmosphere is free from threats, violence, harassment and discrimination. Bullying in any form is in direct contradiction to respectful interaction with one another and is therefore not tolerated.

Equality, equal treatment and the advancement of women are seen as a matter of course at FFoQSI and are actively implemented. FFoQSI strives for a balanced ratio of women to men, especially in management positions.

FFoQSI does not tolerate any form of sexual harassment. Sexual harassment has consequences under criminal and labor law.

All of these principles apply both to internal cooperation between employees and to external cooperation with external business partners and to all other constellations arising from FFoQSI's activities.

Decisions regarding personnel, business partners, etc. are made exclusively on the basis of appropriate considerations and never for other, extraneous motives such as discrimination, preferential treatment or coercion.

FFoQSI members fulfill the areas of responsibility and tasks assigned to them with commitment and loyalty. These standards include honesty, fairness, appreciation and respect for the rights of others, both in the scientific field and in the service sector.

FFoQSI members must perform their duties in accordance with the principles of legality, efficiency, expediency, economy, transparency and in the public interest.

FFoQSI employees treat each other and external business partners with courtesy and reliability and respect their individual personalities.

The concerns of FFoQSI members are always dealt with in a friendly, objective, appreciative and respectful manner and as quickly as possible.

### 3.5 WHAT IS THE LEGAL BASIS FOR FFOQSI'S ACTIVITIES?

FFoQSI's activities are generally based on Austrian law. A different legal basis may be agreed in the relationship with contractual partners.

In connection with compliance obligations, the following guidelines and regulations, as amended, also be observed in particular:

- Criminal law on corruption, whereby FFoQSI employees and university staff are in any case considered *public officials* in the strictest sense
- Primer on the Corruption Criminal Law Amendment Act 2012
- Federal Public Corporate Governance Codex
- European Code of Conduct for Research Integrity
- Code of Conduct for Responsible Research of the WHO
- European Charter for Researchers
- EURAXESS Code of Conduct for Recruitment

In connection with projects, the following also apply in particular:

- Union framework for State aid for research, development and innovation as amended
- Applicable funding guidelines
- Subsidy agreements
- Framework agreements with partners (e.g. COMET Cooperation Agreement, EU Consortium Agreements etc.)
- Cooperation agreements with partners

For employees of FFoQSI, special attention must also be paid to works agreements, guidelines and directives, if available, in the respective applicable version.

Other existing legal provisions and standards as amended and all other FFoQSI guidelines and directives as amended remain unaffected by this directive. This manual supplements these provisions.

If applicable national law and specific operating regulations contain mandatory legal provisions or set stricter standards than those contained in this manual, the stricter standards must be applied.

### **3.6 IS ADHERENCE TO THE COMPLIANCE GUIDELINE AN OFFICIAL DUTY?**

It should be noted that compliance with these (and other) FFoQSI guidelines is an official duty or an obligation arising from the assignment by FFoQSI. In addition, the provisions of this manual must be brought to the attention of all FFoQSI employees and must be complied with by them.

If there are compliance guidelines for FFoQSI members in their "home institutions" to which they are already subject due to their employment/contractual relationship, this handbook is to be understood as a supplement. In the event of contradictions between the compliance guidelines of the "home institution" and this handbook, the FFoQSI Compliance Board should be contacted ([compliance@FFoQSI.at](mailto:compliance@FFoQSI.at)).

### **3.7 WHO IS RESPONSIBLE FOR COMPLIANCE WITH THE COMPLIANCE GUIDELINE?**

Each individual FFoQSI member is responsible for complying with and implementing the provisions of this manual.

Supervisors, such as working group leaders and project managers, must act as role models for other FFoQSI employees in implementing the contents of the compliance guideline. They must monitor compliance and, if necessary, inform and train accordingly with the support of the responsible departments at.

In particular, every FFoQSI member is obliged to

- comply with the laws, regulations, rules and internal instructions applicable in his/her area of responsibility;
- act in a fair, respectful, appreciative and trustworthy manner in all activities and business relationships;
- respect and promote the reputation of FFoQSI;
- avoid conflicts of interest between business and private matters;
- draw attention to potential conflicts of interest on its own initiative;
- not to procure or grant unlawful advantages to themselves or others.



### **3.8 HOW ARE THE PROVISIONS OF THIS MANUAL TO BE UNDERSTOOD?**

When interpreting the rules of the Code of Conduct, FFoQSI members must also be guided by common sense and question whether, on the basis of reasonable ethical and moral standards, a specific course of action could give rise to criticism.

If the Compliance Guideline conflicts with other internal FFoQSI rules and regulations, the FFoQSI Compliance Board must be consulted for final clarification.

## **4 COMPLIANCE BOARD**

---

### **4.1 WHAT IS THE COMPLIANCE BOARD AND HOW DOES IT WORK?**

FFoQSI has set up a Compliance Board (COMBO) to further develop the regulations in the area of compliance and to deal with current issues and specific problems in the area of compliance. The COMBO makes recommendations to the FFoQSI management.

The COMBO consists of at least three members who are appointed or dismissed by the Management Board. If a works council exists, it has the right to nominate a COMBO member. The COMBO members appoint a chairperson from among their number. Members of the COMBO are entitled to resign or to suspend their function in the event of bias. In the event of suspension, a substitute member must be appointed for the duration of the suspension. Members who withdraw must ensure that neither FFoQSI members nor FFoQSI suffer any disadvantage as a result.

The members of COMBO are obliged to maintain confidentiality. This obligation does not apply to the Management Board or the Supervisory Board, unless otherwise stipulated by law. However, the members of COMBO must also keep the identity of reporting persons confidential vis-à-vis the Management Board and the Supervisory Board at their request, unless otherwise stipulated by law. The duty of confidentiality shall apply for an unlimited period of time, even after the end of the activity.

The members of COMBO may neither be favored nor disadvantaged on account of their activities. They are not bound by instructions with regard to the content of their recommendations.

The COMBO meets when necessary. Coordination within the COMBO is also possible by telephone or via web conference. In any case, confidentiality must be ensured at the meetings. COMBO recommendations are adopted unanimously. If unanimity is not possible, the recommendation must present the views of the members in a differentiated manner and indicate options for the management.

If necessary, the COMBO can also be replaced by a digital notification system. This will be communicated separately in the event of implementation.

### **4.2 WHEN SHOULD THE COMPLIANCE BOARD BE CONSULTED?**

Compliance issues can be referred to the COMBO by all FFoQSI members. The COMBO must be consulted in particular in the case of

- Suspicion of corruption (corruption report)
- Violations of compliance (compliance report)
- Potential conflicts of interest (conflict request)

Inquiries and reports to COMBO can be made via *compliance@FFoQSI.at* and - as soon as available - via the intranet or a whistleblower portal. Furthermore, the contact details of the members can be requested at this address (or, if available, from the works council). Reports are treated confidentially in any case, and the identity of reporting or inquiring persons is also protected from the management on request.

FFoQSI employees who contact COMBO in good faith regarding suspected violations of the law, the provisions of the Handbook or other internal policies and regulations, whether or not they are substantiated, will not suffer any negative consequences as a result of this report. This also applies to other persons who contribute important information to the investigation and clarification of suspected misconduct. Reprisals of any kind against complainants will not be tolerated.

However, FFoQSI expressly reserves the right to take disciplinary action against FFoQSI employees who intentionally or grossly negligently make false accusations.

#### 4.3 HOW DOES THE COMPLIANCE BOARD PROCEED?

In the case of reports to COMBO, the receipt of the report or request must be confirmed to the reporting person within 5 working days and the further procedure must be communicated.

The COMBO must clarify the facts underlying the report or inquiry, make a legal classification, report to the Executive Board and propose further steps. In justified cases, the COMBO is entitled to decide to report directly to the Chair of the Supervisory Board instead of the Management Board. In the event of inquiries regarding conflicts of interest, the COMBO may make recommendations directly to the person making the inquiry to avoid conflicts of interest; in this case, reporting to the Management Board may be dispensed with. Reports, steps taken and other circumstances must be carefully recorded by COMBO in compliance with confidentiality and data protection regulations.

The management or the Chair of the Supervisory Board may instruct COMBO to carry out further investigations and assessments or to initiate further procedural steps, including legal action. The Chair of the COMBO shall be authorized to represent FFoQSI vis-à-vis third parties to the extent necessary.

#### 4.4 WHO DOES THE COMPLIANCE BOARD REPORT TO?

The COMBO reports to and makes recommendations to the Executive Board while maintaining confidentiality and identity protection. In justified cases (e.g. if the Management Board is affected by a report), the COMBO may decide to report directly to the Chair of the Supervisory Board.

In the event of questions about possible conflicts of interest, COMBO can make recommendations for avoiding conflicts directly to the person making the request.

The person chairing the COMBO reports to the Supervisory Board once a year (in the 4th quarter) on the compliance situation (compliance report) at FFoQSI, current and/or important developments and compliance-relevant incidents.

## 5 INTERNAL PRINCIPLES OF CONDUCT

---

### 5.1 HOW DO I BEHAVE AS A FFOQSI MEMBER IN ACCORDANCE WITH THE LAW AND REGULATIONS?

Every FFoQSI employee must observe the applicable FFoQSI guidelines and directives, the provisions laid down in any company agreements and the statutory provisions of the legal system in which he/she is acting. Violations of the law must be avoided under all circumstances

FFoQSI employees are therefore required to inform themselves comprehensively about the laws, other regulations and internal guidelines and rules applicable to their respective area of responsibility.

### 5.2 HOW IS THE CHAIN OF COMMAND STRUCTURED IN FFOQSI?

The organizational structure of FFoQSI corresponds to a matrix organization. FFoQSI employees are assigned to *working groups*. These working groups are involved in various projects or are part of service centers or research areas.

The heads of the working groups perform the function of a line manager and have the right to issue instructions in matters of occupational safety and orderly operation, even if they are not employees of FFoQSI. Supervisors are also authorized to issue instructions in technical matters. The disciplinary instruction function is carried out by FFoQSI.

In any case, management and authorized signatories have comprehensive authority to issue instructions to FFoQSI employees.

### 5.3 WHAT DUTIES DO LINE MANAGERS HAVE?

Supervisors (project managers, area managers, personnel administrators) fulfil **organizational and supervisory duties** and bear responsibility for the FFoQSI members entrusted to them. However, this responsibility does not release the individual FFoQSI employees from their own personal responsibility.

Supervisors carefully select FFoQSI employees according to their qualifications and suitability as well as objective standards, and the processes in the FFoQSI personnel handbook must be observed. The duty of care increases with the importance of the task to be performed by the FFoQSI employee (**duty of selection**). In the context of university working groups in which FFoQSI employees are involved, they may also be called upon for general activities in the respective working group.

Supervisors must set tasks precisely, completely and bindingly, in particular with regard to compliance with legal provisions (**duty to issue instructions**). Supervisors are familiar with

the necessary legal framework conditions or acquire them within a reasonable period of time. Specialist supervisors who are not in an employment relationship with FFoQSI work together with FFoQSI managers.

Supervisors clearly communicate the importance of integrity and compliance with legal provisions in day-to-day business to the FFoQSI employees entrusted to them. They must point out that violations of the law will not be accepted and will result in disciplinary measures (**duty of communication**).

Supervisors shall grant the FFoQSI employees entrusted to them as much personal responsibility and freedom of action as appropriate. Through appropriate supervision, the manager ensures compliance with legal provisions and the regulations applicable to FFoQSI. (**Duty of control**, incl. (at least) **dual control principle**).

Supervisors shall take measures for the personal and professional development of the FFoQSI employees entrusted to them, e.g. through appraisal interviews, training and courses, in accordance with the resources available. When training objectives are agreed with employees, supervisors ensure that these are realistically assessed and set; they are responsible for their fulfillment and support the employee to the best of their ability in achieving these objectives. Supervisors encourage the FFoQSI employees entrusted to them to continuously develop the work processes and to make suggestions for improvement.

Supervisors are aware of their relationship of authority to the FFoQSI members entrusted to them in their professional environment and ensure that they maintain an appropriate professional distance when exercising their supervisory function.

Supervisors take into account any care responsibilities of employees as far as possible when allocating tasks and determining working hours.

Supervisors bear cost responsibility for the assigned unit, taking into account the overall interests of FFoQSI. Together with the FFoQSI employees entrusted to them, they ensure that resources are used economically and efficiently and that FFoQSI's economic and scientific interests are safeguarded.

Supervisors observe the principles of risk minimization and value preservation in connection with financial transactions.

## 6 DEALING WITH BUSINESS PARTNERS AND THIRD PARTIES

---

### 6.1 WHAT VALUES ARE IMPORTANT WHEN DEALING WITH BUSINESS PARTNERS AND THIRD PARTIES?

FFoQSI expects business partners and external institutions and persons to share FFoQSI's values and to comply with all legal requirements.

In addition, business partners and external persons are also expected to apply the following principles, as FFoQSI assumes them for itself with regard to responsibilities towards stakeholders and the environment:

- compliance with all applicable laws,
- the renunciation of corruption,
- respect for the human rights of its employees,
- taking responsibility for the health and safety of their employees,
- compliance with the relevant national laws and international standards on environmental protection.

FFoQSI wins orders fairly through the quality and price of its innovative services, and not by offering others undue advantages.

No FFoQSI employee may offer, promise, grant or authorize unjustified advantages - directly or indirectly - to public officials or other third parties in connection with business activities. No monetary payments or other benefits may be made in order to influence official decisions or to gain an unjustified advantage. The same applies with regard to unjustified advantages vis-à-vis persons in the private sector.

FFoQSI also acts sensitively with regard to prohibited agreements and antitrust regulations. In particular, it is not permitted to talk to competitors about prices, production performance, capacities, sales, tenders, profit, profit margins, costs, distribution methods or other factors that determine or influence the company's competitive behavior in order to persuade them to behave similarly.

### 6.2 WHAT PRINCIPLES DOES FFOQSI FOLLOW TO PREVENT CORRUPTION?

In accordance with the **separation principle**, there is a clear separation between donations and business transactions. Contributions to FFoQSI or FFoQSI employees may not be made dependent on sales transactions. In particular, benefits may not be granted in order to exert undue influence on decisions.

The **transparency principle** stipulates that donations as well as the documentation of service exchanges in the form of agreements and contracts must be disclosed.

Based on the **documentation principle**, all paid and unpaid services and consideration are documented in writing. As a rule, documentation is provided in the form of contracts. Corresponding documents must be kept for at least 10 years.

In accordance with the **principle of equivalence**, benefits and consideration must be in reasonable proportion to each other. Under no circumstances may any benefits or services serve the private interests of FFoQSI members.

### 6.3 HOW DOES FFOQSI FIGHT CORRUPTION?

Every offer, promise, contribution and gift must comply with the applicable laws and FFoQSI guidelines. In addition, any appearance of dishonesty or impropriety must be avoided.

### 6.4 WHAT MEASURES DOES FFOQSI TAKE TO PREVENT MONEY LAUNDERING?

It is FFoQSI's declared aim to only maintain business relationships with consultants and business partners whose business activities are in accordance with legal regulations and whose financial resources are of legitimate origin. FFoQSI only maintains business relationships with companies that disclose the ownership structure and the identity of the owners.

Before initiating business with consultants and business partners, FFoQSI checks their economic background and performance on the basis of generally accessible sources of information (e.g. KSV query, company register query, internet research).

FFoQSI employees are obliged to strictly comply with anti-money laundering laws.

### 6.5 WHY IS FFOQSI COMMITTED TO FAIR COMPETITION?

Fair competition is a prerequisite for free market development and the associated social benefits. Accordingly, the principle of fairness also applies in business life and in competition for market share.

The tendering and awarding of supplies and services is carried out in fair competition between different providers in compliance with the principle of dual control and the defined value limits. In particular, every member of FFoQSI is obliged to comply with the rules of fair competition. In addition, FFoQSI's procurement regulations must be complied with in all cases.

FFoQSI is subject to the Federal Procurement Act. In the case of higher-value procurements, contact must be made with the responsible FFoQSI office *before initiating procurements* and its instructions must be followed. The solicitation of offers and examination of potential suppliers shall only take place in agreement with Procurement in order to avoid any possible violations of the law.



## **7 DEALING WITH BENEFITS**

---

### **7.1 HOW SHOULD DONATIONS TO FFOQSI BE HANDLED?**

In principle, the management decides on the acceptance of offers made to FFoQSI regarding any kind of benefits. Corresponding offers must be forwarded to the management.

Donations may only be accepted on the basis of a corresponding agreement (e.g. sponsorship agreement, donation pledge, etc.).

### **7.2 WHAT ARE THE RULES REGARDING BENEFITS TO FFOQSI EMPLOYEES?**

The acceptance of monetary benefits or benefits of monetary value by FFoQSI employees is generally prohibited, unless otherwise stipulated by law or internal guidelines. Similarly, the acceptance of gifts and other benefits from third parties by FFoQSI employees is generally prohibited, unless otherwise stipulated by law or internal guidelines.

The acceptance of advantages, benefits or rewards from third parties by FFoQSI employees is generally prohibited, unless otherwise stipulated in this guideline or unless the advantages are available to all FFoQSI employees in the same way on the basis of an agreement (e.g. with the works council or the company). The acceptance of monetary prizes and awards - e.g. for scientific achievements - is only permitted in accordance with the provisions of the employment contract or any company agreements, otherwise only with the consent of FFoQSI.

Donations to family members or other related parties are generally not to be accepted.

Offers of benefits and gifts that are not expressly permitted under these guidelines must be politely rejected with reference to these provisions. The management must be informed of the offer in writing or by e-mail. If necessary, the Compliance Board must be consulted.

The acceptance of low-value gifts and promotional gifts such as pens, calendars, writing pads etc. by FFoQSI employees is permitted if they are clearly promotional items and the value of the promotional gift to be accepted does not exceed EUR 100.00.

The acceptance of guest or honorary gifts, for example in the course of visits by international guests or delegations, is permitted if these are typical or customary guest gifts of appropriate value and FFoQSI is the recipient of the guest or honorary gift. Guest or honorary gifts received must be reported to the management. The latter shall decide on the further use.

### **7.3 HOW ARE DONATIONS TO THIRD PARTIES REGULATED?**

If guest or honorary gifts are to be presented in the course of an event or business trip, the express approval of the management must be obtained in advance. Procurement shall be

carried out in accordance with the provisions of the procurement guidelines. The intended use must be documented during the procurement process. Minor guest gifts up to an equivalent value of EUR 100.00 are exempt.

The offer or provision of benefits to third parties, including gratuitous benefits to third parties, by employees is prohibited, unless otherwise stipulated by law or in this policy.

In particular, it is prohibited to make or promise to make direct or indirect payments, gifts or benefits to third parties,

- if they are offered to the third party with the aim of entering into or maintaining business relations with certain persons or companies. This does not apply to promotional gifts that are provided with FFoQSI branding for the purpose of passing them on.
- if they can be understood as an attempt to influence a public official or to bribe a business partner in order to gain business advantages for FFoQSI.

When engaging business partners or external persons, it must be ensured in an appropriate manner that such third parties are aware of and comply with FFoQSI's anti-corruption guidelines or comparable provisions, that the qualifications and reputation of such "third parties" are carefully checked and that suitable contractual provisions are agreed to protect FFoQSI.

In order to ensure this, FFoQSI must check the ethical and economic conduct of business partners and external persons (e.g. consultants) using generally accessible sources of information (e.g. KSV query, company register query, internet search) before initiating business with them. This applies in particular if they have contact with public officials on behalf of FFoQSI.

Contracts may only be awarded in accordance with the procurement regulations.

## **7.4 WHAT SHOULD I BEAR IN MIND WHEN PARTICIPATING IN EVENTS?**

Participation in external events is only permitted for FFoQSI employees if this is part of their official duties or for their own professional development or to represent the Centre.

Invitations to further education and training events addressed to the Centre must be forwarded to the area management, which decides on the participation of employees.

The acceptance of invitations to guest lectures or contributions to further education and training events or congresses is permitted if the duration of the event is proportionate to the costs borne by third parties. Before accepting such an invitation, the approval of the management (travel request) must be obtained. As a rule, any reimbursement of costs must be made directly to the Centre.

The acceptance of personal invitations to further education and training events is prohibited if the acceptance of the invitation involves the assumption of costs by third parties and no personal contribution is made to the event (lecture, chairmanship, etc.). Such invitations must

be reported to the management. The inviting person must be informed that the invitation (at least a copy) must be sent to FFoQSI GmbH (*office@ffoqsi.at*). FFoQSI decides whether the invitation is accepted and which employee is sent. If approval is not possible before participation in a framework event because the invitation is only issued at the event location during the conference, the management must be informed immediately by e-mail or telephone.

In the case of events with an extensive supporting program (e.g. skiing, sightseeing, etc.), agreement must be reached with the management when applying for the business trip, and an agreement must be reached on the assumption of costs, unless the costs for the supporting program are borne privately.

The acceptance of invitations to events of a predominantly recreational nature (cultural, social, sports, wellness events, etc.) is prohibited. Such invitations must be reported to the management.

In any case, caution is advised when participating privately in external events - especially if business contacts act as organizers or sponsors. Clarification with the management is recommended.

In addition, the assumption of business travel expenses by business partners or third parties is only permissible if this is done on the basis of an agreement between FFoQSI GmbH and the business partner and if this does not create any appearance of bias.

The assumption of travel or accommodation costs of close persons or relatives is generally not permitted.

## **7.5 HOW SHOULD INVITATIONS BE HANDLED?**

The acceptance of invitations or participation in hospitality on the occasion of official activities, meetings etc. is only permitted if the hospitality is customary and appropriate (e.g. buffet etc.).

Strict standards must be observed when assessing appropriateness. Reasonableness can be assumed if the catering relates to a large number of participants (event buffet). In the case of communal meals with a small number of people (less than 5 participants as a guideline) and/or in an unusual setting, the assumption of costs by third parties should be rejected in case of doubt or agreement should be reached with the management.

Participation in meetings, discussions, etc. organized by the Centre is unobjectionable and permissible, even if hospitality is provided as part of the event.

## **7.6 HOW SHOULD COST REIMBURSEMENTS, COMPENSATION AND BONUSES BE HANDLED?**

If reimbursements of costs, compensation or bonuses due in the course of employment are accepted, they must be collected on behalf of FFoQSI. This includes in particular reimbursements or compensation in the course of travel (flight delays etc.). Credit notes,

vouchers or refunds from travel companies are due to FFoQSI and must be offset. They may not be used for personal purposes.

## 7.7 HOW TO DEAL WITH GRANTS, PRIZES AND AWARDS?

Applications for funding by FFoQSI employees are generally only permitted with the approval of the management or as part of approved secondary employment (as defined by 9.3).

Applications for scholarships and similar grants must be coordinated in advance by FFoQSI employees with the management.

In the case of a monetary award granted to FFoQSI (e.g. inventor innovation prizes etc.), the acquisition of which is attributable to the initiative of one or more persons on duty, the respective persons shall be entitled to remuneration. If a monetary prize or award (e.g. presentation prize, poster prize, Nobel Prize) is awarded by a third party *ad personam* on the basis of personal achievements, FFoQSI shall not be entitled to claim this. However, the award must be reported to FFoQSI.

## 7.8 HOW DOES FFOQSI DEAL WITH SPONSORING AND OTHER DONATIONS?

All donations must be transparent. This means, among other things, that the identity of the recipient and the planned use of the grant must be known. The reason for and purpose of the grant must be legally justifiable and documented.

Remuneration similar to donations, i.e. benefits that appear to be granted as remuneration for a service but significantly exceed the value of the actual service, violate the transparency requirement and are prohibited.

Only the management decides on the awarding of gifts, donations or the entering into sponsorship commitments.

## 7.9 WHEN IS SPONSORSHIP PERMISSIBLE?

Accepting or demanding support from third parties for internal company events (e.g. sponsoring of company parties etc.) is not permitted.

Sponsoring activities, i.e. donations in the form of money, material assets or services by third parties to FFoQSI or by FFoQSI to third parties, are only permitted on the basis of written sponsoring agreements. They must be transparent, set out in the form of a written contract, be intended for a serious business purpose and be in reasonable proportion to the value offered by the organizer.

Sponsorship agreements are concluded by the management. Sponsorship offers received or offers of other benefits must be forwarded immediately to the management, which will decide on how to proceed. Unauthorized commitments or acceptances by FFoQSI employees must be refrained from in any case.

#### **7.10 HOW SHOULD OFFERS FOR DISCOUNTS AND BONUSES BE HANDLED?**

Offers of donations in kind, discounts in kind and similar benefits must be forwarded immediately to the management, which will decide on how to proceed. Unauthorized acceptance is to be refrained from in any case.

Unless otherwise contractually agreed, the acceptance of gifts for deliveries and services is prohibited. Any unsolicited gifts must be reported. Unobjectionable promotional gifts with a value of up to EUR 100.00 (pens, notepads, jelly babies, etc.) are excluded from this.

The agreement of discounts, rebates or other benefits shall be made exclusively by the FFoQSI ordering department. Corresponding offers must be forwarded to the FFoQSI ordering department.

#### **7.11 ARE DONATIONS TO POLITICAL PARTIES PERMITTED?**

Contributions to political parties by FFoQSI are expressly prohibited. FFoQSI is subject to the statutory reporting obligation to the Court of Auditors with regard to business relationships with institutions associated with political parties.

#### **7.12 ARE OTHER BENEFITS PERMITTED?**

Other benefits may not be promised, offered or provided in order to gain unlawful business advantages for FFoQSI or to pursue an inappropriate purpose.

## 8 DEALING WITH COMPANY INFORMATION

---

As an innovative company, FFoQSI attaches great importance to the protection of its corporate information, especially its business secrets. FFoQSI employees must therefore treat **all data and information, even if it is not explicitly marked as confidential, secret or top secret**, with particular care and sensitivity during and after the end of their work at and with FFoQSI; in particular, the confidentiality and data protection provisions of the FFoQSI Consortium Agreement must be observed when passing on information or data (both externally and internally) .

All information is subject to the provisions of Austrian and European data protection law, Austrian and European competition law as amended, as well as corresponding company regulations.

All FFoQSI employees undertake to maintain confidentiality regarding business and trade secrets as well as information relevant to the business of business partners, suppliers, other contractual partners and third parties. The obligation to maintain confidentiality shall continue indefinitely beyond the end of the cooperation.

### 8.1 WHAT IS A TRADE SECRET?

Trade secrets are defined in § 26b UWG. Trade secrets include, in particular, the information listed in the FFoQSI Consortium Agreement under "5.1.4 Confidentiality and restriction of use", e.g:

- All data generated in the course of research work, research approaches, research and development results, experimental work, results, inventions and developments including DNA sequences, protein sequences, biological constructs, chemical formulas and methods for their production or analysis, and biological constructs as well as biological and chemical materials, project drafts, manuscripts, theses, speculations, discourse results, drafts, protocols, records and similar data;
- All personal data from data processing that has been entrusted to the employee exclusively for professional purposes or has become accessible in accordance with § 6 of the Data Protection Act as amended;
- All economic data, reports, concepts, contracts, agreements and the like, in particular details of the company's organization and facilities, prices, sales, profits, markets, customers and other business matters such as business processes, business forecasts, business strategies, internal reporting figures;
- "Negative information" such as imminent insolvency, violations of the law, difficulties in projects or research priorities, etc;
- All confidential data or information provided by third parties (industrial partners, scientific partners), especially if a confidentiality agreement has been concluded

FFoQSI supports scientific publications; these are possible under the conditions listed in the consortium agreement under "5.3.7. Publications". Furthermore, the framework conditions specified in the IPR Policy must be complied with.

## 8.2 HOW DO I HANDLE CONFIDENTIAL INFORMATION?

All information obtained in the course of professional activities - including information outside the scope of one's own activities - may neither be used for the pursuit of private interests nor made accessible for the use of the interests of third parties.

FFoQSI members must observe the need-to-know principle. Even within the working groups or between the individual working groups and within FFoQSI, confidential information should only be passed on after careful consideration to those FFoQSI members who absolutely need the confidential information for the fulfillment of their task.

The transmission or other disclosure of information, data or personal data as well as materials to unauthorized recipients within and outside FFoQSI is prohibited. Should external third parties require access to confidential information, they must sign a binding confidentiality agreement regarding the content of the information made accessible to them, unless confidentiality is secured by contracts concluded with FFoQSI (e.g. cooperation agreement, consortium agreement, etc.)

Confidentiality agreements for FFoQSI must be signed by the FFoQSI management or the FFoQSI authorized signatory. It should be noted that confidentiality agreements between FFoQSI and third parties do not automatically apply to employees of the scientific partners, but sometimes a separate agreement is necessary. It should also be noted that any agreements signed by employees of the academic partners on behalf of the respective university do not apply to FFoQSI.

Even if a non-disclosure agreement has been concluded, the trustworthiness of persons who are to receive information must be assessed and taken into account.

To protect business secrets, access data to computers, laptops, online systems, etc. must be kept secure and confidential. Sharing access data and passwords is prohibited in any case.

The use of IT systems of scientific partners for the processing and storage of data is only permitted for confidential and secret data and only if there is suitable access protection (no general passwords or open servers!). Strictly confidential data may only be processed or stored on FFoQSI systems (servers, project folders, etc.) or must be suitably encrypted.

If PCs, laptops or cell phones - including private devices - are used, suitable protective measures (encryption, theft protection, third-party access, etc.) must be taken to effectively protect business secrets. If this is not possible, use is prohibited.

When storing data in cloud services, services provided by FFoQSI are to be preferred. When using other cloud services, the security provisions of these providers must be applied accordingly.

Secret or top secret data that is no longer required must be destroyed appropriately (e.g. paper shredder, secure deletion on the computer). A simple waste paper basket or waste paper garbage can and simple deletion on the computer are not sufficient. For top secret data, secure deletion with multiple overwriting is required.

Written records, in particular minutes, minute books, manuscripts, motions, etc. must be stored securely. If strictly confidential data is involved, a higher security standard (locked storage) must be applied.

Caution should also be exercised when making business calls in public places. Such telephone calls should be kept as short as possible and postponed if possible. Confidential information should in any case be omitted.

Confidentiality obligations must also be strictly observed in the context of examinations and lectures (diploma examinations, intermediate examinations, rigorous examinations, habilitation lectures, etc.). It is the responsibility of the respective examinee or lecturer to ensure compliance with the confidentiality provisions. This can be done, for example, through confidentiality agreements with persons present and/or exclusion of the public. For these purposes, FFoQSI will issue a confirmation of compliance with confidentiality regulations. Furthermore, FFoQSI provides confidentiality agreements for such occasions on request (*office@FFoQSI.at*).

Business secrets of the employee's former employer may not be used under any circumstances in the context of the employment relationship with FFoQSI. The unauthorized use of third party trade secrets is strictly prohibited.

Any further-reaching other provisions on confidentiality obligations remain unaffected by the above obligations, provided they do not conflict with data protection law.

### 8.3 WHAT SANCTIONS ARE PROVIDED FOR MISUSE?

FFoQSI members acknowledge that the violation of business or trade secrets as well as the misuse of entrusted documents for the purpose of competition is punishable by law in accordance with § 11 UWG as amended.

Data processing with the intention of profit or damage is also punishable by law according to § 63 DSG as amended. The violation of data secrecy is punishable by an administrative penalty in accordance with § 62 DSG as amended.



## 8.4 HOW SHOULD PERSONAL DATA BE HANDLED?

Without prejudice to other confidentiality obligations, FFoQSI employees may only process and transmit personal data that has been entrusted to them or has become accessible to them as a result of their work at FFoQSI on the express instructions of FFoQSI. In particular, they are prohibited from

- to transmit **or otherwise** make data **accessible to unauthorized recipients within and outside FFoQSI** (this applies, for example, to university members, partners, but also family members);
- to obtain or process data without authorization;
- to use personal data **for any purpose** other than the **respective lawful execution of tasks**; this obligation shall continue to exist even after the termination of their activity and/or after leaving FFoQSI GmbH.

## 8.5 HOW SHOULD PERSONAL DATA BE PROTECTED?

In addition, personal data must **be stored securely** and may only be transferred if the necessary precautions are taken.

In particular when processing information and data electronically and when accessing data on mobile devices, FFoQSI members must also observe the precautionary/protection measures set out by FFoQSI or implement them on their own responsibility.

The standard of data quality and technical protection against unauthorized access must correspond to the current state of the art. The use of data must be transparent for the data subjects, and their rights to information and, where applicable, to object, block and delete data must be safeguarded.

FFoQSI employees must not suffer any disadvantage from refusing to carry out an order that would violate data secrecy.

## **9 DEALING WITH CONFLICTS OF INTEREST**

---

### **9.1 WHY IS THE SEPARATION AND DISCLOSURE OF PRIVATE AND BUSINESS INTERESTS IMPORTANT TO FFOQSI?**

All FFoQSI employees are obliged to make their business decisions in the best interests of FFoQSI and not on the basis of personal interests. Conflicts of interest arise when FFoQSI employees pursue their own activities or personal interests at the expense of FFoQSI's interests.

In order to avoid any actual or perceived conflicts of interest, a strict separation of FFoQSI interests and private interests, as well as transparency, must therefore be ensured.

Should conflicts of interest arise between FFoQSI members and their "home institutions", this conflict must be disclosed and, if necessary, referred to the Compliance Board.

### **9.2 HOW CAN A CONFLICT OF INTEREST ARISE AND HOW SHOULD IT BE DEALT WITH?**

Conflicts of interest can arise in many situations. These include, among others:

- If a member of FFoQSI manages a company or works for a company that competes with FFoQSI or engages in activities that compete with FFoQSI.
- If a member of FFoQSI pursues a secondary activity that could represent a competitive situation for FFoQSI.
- If a member of FFoQSI has private orders carried out by companies with which he/she has business dealings in the course of his/her work for FFoQSI and if he/she could gain advantages from this. This applies in particular if the FFoQSI employee has direct or indirect influence or can exert influence on the commissioning of the company for FFoQSI.
- If a FFoQSI employee who directly or indirectly holds or acquires an interest in a company that is in competition with FFoQSI, this must be reported to the HR department.

It is important that all FFoQSI employees recognize and avoid conflicts of interest that may arise in the course of their professional activities. The FFoQSI employee must disclose any personal interest that may exist in connection with the performance of his/her duties at FFoQSI to his/her manager and bring it to the attention of the FFoQSI COMBO.

### 9.3 WHAT RULES APPLY TO SECONDARY EMPLOYMENT

All gainful secondary employment or other activities of FFoQSI employees or relatives must not conflict with the interests of FFoQSI or prevent employees and relatives from dutifully fulfilling their duties at and for FFoQSI.

All gainful secondary employment of employees must be reported to the employer in writing and is subject to approval; this also applies mutatis mutandis to the activities of employees in the preparation of or in "spin-off" companies.

The commencement of such an activity may be prohibited, stating reasons, if this is necessary to prevent an impairment of the legitimate interests of FFoQSI, whereby FFoQSI generally has a great interest in the establishment of "spin-offs" and supports future entrepreneurs wherever possible. The same also applies to consents already granted to carry out an activity, which can be subsequently revoked.

The provision of services for remuneration as part of an approved secondary employment is permitted, but must be proven to take place outside working hours. As a rule, a vacation notification must be submitted for this purpose. The approval of secondary employment is carried out by the management via the HR department.

If services are to be provided in return for payment as part of an approved secondary employment, in combination with business activities or business trips (e.g. paid lecture in the course of a business trip), agreement must be reached with the management in advance.

Otherwise, a written agreement between FFoQSI as the service provider and the service recipient is required for the provision of services against payment.

Approval is also required in particular when joining a legal entity as a member of an executive body, when assuming a trusteeship and when holding offices in associations and organizations, provided that these are not exclusively related to private life.

Services to third parties that are to be provided on the basis of the service activities at the Centre (lectures, mandates, etc.) are generally to be provided in the name of the Centre and invoiced via the Centre. Corresponding requests must be forwarded to the management.

Since independence and impartiality are of fundamental importance to FFoQSI, all circumstances that could influence impartiality or independence, or even create the appearance of influence, must be strictly avoided.

### 9.4 WHAT NEEDS TO BE CONSIDERED WHEN APPOINTING AN EXPERT?

If employees work for FFoQSI as experts or experts on behalf of authorities or international organizations as part of their official duties, this guideline must be applied. This activity must be reported as a secondary occupation if it lasts longer than 3 months or is carried out regularly. This also applies to work as a reviewer, proofreader or editor.

## 9.5 WHAT TO DO IN THE EVENT OF CONFLICTS OF INTEREST?

In the event of conflicts of interest due to personal close relationships (bias), FFoQSI members must disclose their personal bias in advance. Disclosure can be made to the HR department or COMBO.

Conflicts of interest or bias must be discussed in the COMBO, if necessary, which should propose a mutually agreeable, transparent and fair solution for all parties involved between the FFoQSI member, his/her sending institution and FFoQSI.

## 10 SOCIAL RESPONSIBILITY

---

FFoQSI stands for **scientific integrity**. FFoQSI researchers are committed to the criteria of scientific integrity in their research activities. They act responsibly, fairly and in accordance with the standards of good scientific practice.

FFoQSI stands for **compliance with ethical principles of scientific work and for the moral and ethical independence of research**. Against the background of freedom of research, the ethical principles of scientific work are adhered to in order to prevent plagiarism, deception or the falsification of research results.

FFoQSI members ensure that the way in which a research project is funded does not exert any unacceptable influence on ethical principles, procedures and research results. The hierarchies within research projects do not jeopardize the independence of research. Transparency is created with regard to the objectives, results, funding and, where applicable, commissioning parties of research projects. The aim is to market and/or publish research results independently of the political or economic interests of funding bodies or research participants.

FFoQSI also stands for **fair team research**. In the research group, the researchers strive for a fair discourse, the integration and appreciation of the performance of the individual persons, from the project application to the publication of the results. The ethical convictions of each individual researcher are taken seriously and respected. Persons with managerial authority have a special responsibility for ensuring respectful treatment and standards of good scientific practice.

FFoQSI also stands for **the promotion of young scientists**. FFoQSI sees itself as a nationally and internationally sought-after partner for young academics. Graduate students, doctoral candidates and post-docs work in networked research groups and receive sound preparation for successful work as scientists in a global context. FFoQSI researchers in established positions enable and promote the independent academic development and qualifying research of their academic staff.

FFoQSI stands for **methodological diversity and interdisciplinarity**. FFoQSI promotes diversity of topics and methods in its research in an international network. The profile is formed by setting research priorities, taking into account socially relevant research questions. Innovative interdisciplinary research and cooperation between subjects are specifically promoted. With a view to social practice, the researchers go beyond their subject boundaries when planning and implementing corresponding projects and develop and promote inter- and transdisciplinary forms of scientifically sound cooperation.

## 10.1 HOW FFOQSI RESEARCHERS ASSUME RESPONSIBILITY TOWARDS SOCIETY

FFoQSI researchers stand for **social responsibility**. Researchers assume their responsibility by applying their knowledge, experience and skills with the utmost care and taking social values into account.

FFoQSI researchers stand for the **precautionary principle in research**. Observing the precautionary principle in research means considering the consequences of research and its application. In particular, risks arising from a high level of penetration into natural and social contexts and the danger of irreversible damage to nature, the environment, people and society are taken into account.

FFoQSI researchers stand for a **comprehensive dialog**: The researchers see an obligation and added value in self-critical dialog within the scientific community, with representatives of social practice and with the public. This increases the quality of research and its social relevance.

## 10.2 ARE EMPLOYEES ALLOWED TO BE POLITICALLY ACTIVE?

Personal political activities of employees concern the area of private life and are not to be assessed by FFoQSI. However, FFoQSI reserves the right to terminate the employment relationship if necessary in the event of activities that damage the reputation of FFoQSI.

However, political activities may under no circumstances be carried out during FFoQSI working hours, may not damage the reputation of FFoQSI and may not have any other influence on the activities at FFoQSI and FFoQSI as a company. No FFoQSI infrastructure or data may be used for these political activities.

## 10.3 HOW DOES FFOQSI CONSERVE AND PROTECT ENVIRONMENTAL RESOURCES?

The protection of the environment and the conservation of natural resources are corporate goals of high priority for FFoQSI. Through appropriate leadership responsibility on the part of management and the commitment of FFoQSI employees, FFoQSI aims to conduct business in an environmentally friendly manner and is constantly working to improve its environmental footprint.

Every FFoQSI member tries to contribute to achieving these goals in the best possible way through their own behavior.

#### 10.4 **HOW DOES FFOQSI PROTECT INTELLECTUAL PROPERTY?**

Scientific inventions and intellectual property may not be used or passed on to third parties without the authorization of the entitled person. The intellectual property rights of third parties must be respected.

#### 10.5 **HOW ARE DECISION-MAKING/-PROCESSES CHARACTERIZED IN FFOQSI?**

Constructive cooperation requires transparency, openness, fairness and correctness. FFoQSI members attach great importance to ensuring that their decisions are comprehensible to others. They strive for objective comprehensibility in all relevant decision-making processes. The distribution of resources should be comprehensible.

In collective decision-making processes, the individual member assumes the responsibility to work to the best of their knowledge and belief for the benefit of the community and society.

#### 10.6 **WHY ARE ACCURATE RECORDS AND FINANCIAL INTEGRITY IMPORTANT TO FFOQSI?**

Open and effective communication includes the correct and truthful fulfillment of statutory reporting obligations. This applies equally to the relationship with FFoQSI employees, business partners and national, international and EU funding bodies. FFoQSI is committed to a transparent approach in the area of payments, both in the preparation, review and approval of payments and in the execution of payment transactions.

All FFoQSI members must ensure that the laboratory, machine books, time and other records prepared by them in the course of their work or otherwise under their responsibility

- are complete,
- are correct,
- reflect each transaction or expense accurately and
- are prepared on time and in accordance with the applicable rules and standards;

whether or not the information is intended for publication or submission to a national, multinational or international body.

These books and records include all data and other written documents that are necessary for financial reporting and fulfillment of disclosure obligations.

## 11 OCCUPATIONAL HEALTH AND SAFETY

---

FFoQSI assumes its responsibility towards all FFoQSI employees with regard to health protection and occupational safety. FFoQSI employees bear joint responsibility for this - appropriate regulations must be complied with and implemented through mindful behavior.

Responsibility towards FFoQSI employees requires the best possible precautions against accident risks and applies to:

- the technical planning of workplaces, facilities and processes,
- security management and
- personal behavior in everyday working life.

The working environment must meet the requirements of a health-oriented design.

If necessary, the FFoQSI safety officer of the respective location must be involved.

### 11.1 WHY ARE ALCOHOL AND DRUGS TABOO IN THE WORKPLACE?

The consumption of alcohol and other legal drugs is prohibited during working hours for reasons of occupational safety. This does not apply to the appropriate consumption of alcohol at company-internal or company-related celebrations.

### 11.2 WHAT RULES MUST BE OBSERVED WHEN USING INFRASTRUCTURE?

All premises and other infrastructure (equipment, furniture, work equipment, IT infrastructure, etc.) provided by FFoQSI or its partners are generally reserved for business use; this also applies mutatis mutandis to the working hours and work assignments of FFoQSI employees.

Excluded from this are activities that are carried out in the context of off-duty attendance time for research work in the interest of the employee's own academic career (e.g. Master's theses, PhD). The applicable house rules must be observed in any case.

FFoQSI members shall use the resources and facilities provided by FFoQSI and its partners in a dedicated, cost-conscious and responsible manner. The FFoQSI member assumes full responsibility for items and technical equipment borrowed from FFoQSI (e.g. for work at home).

FFoQSI employees expressly undertake to return items handed over by FFoQSI at any time upon request within a period of two weeks. This applies in particular, even without an express request, at the latest on the last working day of a FFoQSI employee. The equipment must be returned in a condition appropriate to its age and technical use.



All FFoQSI employees are obliged to comply with all existing guidelines regarding the IT use of FFoQSI as well as any other usage principles of their organizational unit or workplace-specific usage regulations.

## 12 REPORTING MISCONDUCT AND SANCTIONS

---

In case of ambiguities or questions regarding the understanding of this guideline, the responsible COMBO can be contacted at [compliance@FFoQSI.at](mailto:compliance@FFoQSI.at).

If FFoQSI members recognize any misconduct, they are required to report this immediately by e-mail to COMBO ([compliance@FFoQSI.at](mailto:compliance@FFoQSI.at)).

### 12.1 WHAT SANCTIONS ARE PROVIDED FOR BREACHES OF COMPLIANCE?

All FFoQSI employees are considered "public officials" under the Austrian Criminal Code on Corruption (StGBidgF).

It should be noted that compliance with these (and other) FFoQSI guidelines is an official duty or an obligation arising from the position as a FFoQSI employee/employee.

In the event of non-compliance or suspected non-compliance with these Compliance Guidelines or the legal provisions on which they are based, measures may be taken under employment law. Furthermore or additionally, FFoQSI may restrict or completely withdraw the usage and access authorizations of employees and FFoQSI employees, and in particular other authorizations in the area of information and communication technology.

FFoQSI makes use of all sanctions permitted under labor law when punishing violations within the company. In the case of discretionary decisions, the respective sanction is based on the severity of the violation.

Furthermore, non-compliance or suspected non-compliance with the regulations on which this Compliance Guideline is based may lead to consequences under labor law, civil law and/or criminal law.