

Compliance Guideline of the Christian Doppler Research Association

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Preamble

The Christian Doppler Research Association (CDG) promotes cooperation between science and industry. In concrete terms, this takes place in specially established research units with fixed terms, in which application-oriented basic research is carried out: Christian Doppler Laboratories at universities and non-university research institutions, Josef Ressel Centres at universities of applied sciences.

Under the leadership of highly qualified scientists, research groups work in close contact with company partners on innovative answers to entrepreneurial research questions and at the same time make valuable contributions to the UN Sustainable Development Goals and to solving global societal challenges.

These research groups are financed within the framework of a public-private partnership model: The Federal Ministry responsible for economic affairs, the National Foundation for Research, Technology and Development, and the "Österreichfonds" provide public funding of 50% (60% for SMEs). The CDG member companies finance the remaining 50 % (or 40 % for SMEs) of the research expenditure.

The legal framework of the CDG ensures that intellectual property rights resulting from the cooperation as well as related access rights are allocated to the cooperation partners in a way that adequately takes into account their work, their contributions and their respective interests.

CDG funding enables application-oriented basic research in all scientific disciplines at universities, universities of applied sciences and non-university research organizations. When selecting research fields and topics, the CDG usually follows the bottom-up principle, i.e. the funding is open to all topics and is based on forward-looking strategic considerations by industry and the latest developments in the scientific community. This bottom-up principle offers companies not only the greatest possible flexibility in defining the research topics that are strategically important to them, but also the advantage of timely knowledge in global competition.

The CDG is committed to scientific excellence in the allocation of research funds. Applications are evaluated according to the highest international standards and research funding is awarded according to the principle of scientific quality, taking into account the potential to use the research results as a starting point for solving applied problems. The results of the research are taken up by the member companies of the CDG and form an important basis for their innovation.

As the central research funding organization of the federal government and as a non-profit association with approximately 200 member companies worldwide, we feel responsible for the fair treatment of our employees, our members and stakeholders and for the fair and transparent allocation of funding.



We are committed to the principles of objectivity, independence, transparency and cost-effectiveness.

Our Compliance Guideline supports the employees and board members of the CDG in the responsible performance of their duties. It is the basis for morally, ethically and legally impeccable conduct.

1. Scope

This Compliance Guideline applies to all CDG employees, irrespective of the type of employment relationship and hierarchical level, and to all members of CDG bodies (General Assembly, Executive Board, Scientific Board, Strategic Advisory Board). Furthermore, it is in the interest of the CDG that the Compliance Guideline is also brought to the attention of the CDG's external stakeholders.

2. Responsibility for implementation

Each individual employee and board member is responsible for adhering to and implementing the Compliance Guideline.

The managers of the CDG must set an example for their employees in implementing the contents of the Compliance Guidelines. They must also instruct their employees in the use of the Compliance Guideline, monitor compliance and provide training if necessary.

When interpreting the rules of the Compliance Guideline, employees 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. Above all, country-specific standards and practices must also be taken into account. In the case of statutory regulations, there is no scope for discretion. In the event of any ambiguities or questions, each employee's direct supervisor is available to provide appropriate advice and decision-making support.

Employees as well as board members may also contact the Secretary General of the CDG. The President of the CDG is the highest authority for the binding interpretation of the Compliance Guideline in matters of dispute and interpretation.

3rd Compliance with laws and other external and internal regulations

All applicable laws and other external and internal regulations, in particular the rules defined in the



Organizational Handbook and the Data Protection Handbook, must be strictly observed in all business actions and decisions.

All employees and board members are required to inform themselves comprehensively about the laws, other regulations and internal guidelines and rules applicable to their respective areas of responsibility and, in cases of doubt, to contact the responsible bodies (see item 2).

4. Equal treatment and human rights

Non-discrimination and equal opportunities as well as tolerance and fair treatment of our stakeholders and each other are part of our fundamental beliefs. Respectful behaviour in the workplace forms the basis for a positive internal working atmosphere and is therefore an essential prerequisite for professional work.

Based on the UN Charter and the European Convention on Human Rights, human rights are regarded as fundamental values that must be respected and observed by all employees and board members.

The corporate culture of the CDG recognizes and welcomes the fact that every human being is unique and valuable and is to be respected for his or her individual abilities. CDG therefore does not tolerate any kind of discrimination, in any form whatsoever. The latter also applies to sexual harassment in any form, for example through obvious advances, demeaning comments, jokes, foul language, suggestive gestures or the display of relevant visual material in the office premises or on the CDG's digital work media. Such conduct may be classified as harassment even if it was not so intended.

These principles also apply to conduct towards external stakeholders.

5. Corruption, bribery, acceptance of gifts

All board members and employees are strictly prohibited from directly or indirectly offering or accepting advantages (e.g. gifts, invitations, purchasing opportunities at conditions not customary for third parties, interest-free loans, benefits to close relatives, etc.) if this is intended to influence CDG business transactions in an improper manner or could even create such an impression. The only exceptions to this rule are gifts of minor value, local and regional courtesies of little value (like ballpoint pens, calendars and small items) and hospitality within the scope of customary business practices. All other gifts must be refused or returned, and the superior must be informed.

Offering or accepting money or monetary benefits and other benefits including medical services is not permitted under any circumstances.



Country-specific laws and customs must be observed in any case.

Honorary gifts are gifts that are given in recognition of services, as part of a festive occasion or as a gesture of politeness. What is important here is that the 'honourable purpose' and not the 'material' purpose is in the foreground. Such gifts may be accepted, but must be reported to the employer. Such honorary gifts of minor or symbolic value may be given for personal use.

Detailed rules of conduct binding on all CDG employees can be found in [the Federal Code of Conduct \(oeffentlicherdienst.gv.at\)](https://oeffentlicherdienst.gv.at) (see also item 12 in the Federal Code of Conduct).

6th Board membership commits to fair competition

Transparent and fair conduct sustainably safeguards the interests of the CDG as a whole. Restrictions on free competition and violations of competition and antitrust regulations are not compatible with the association's philosophy and culture or with the CDG's self-image.

Violations of national or international antitrust regulations can have serious consequences for the CDG and the board members concerned. In particular, they can result in heavy fines and compensation payments, and in some countries even imprisonment. In any case, a violation will result in expulsion from the respective CDG body. Oral agreements and concerted practices are punished in the same way as written agreements.

All board members must comply with the following guidelines in particular in the course of their board activities:

- No agreements may be made with competitors on business issues that determine or influence anti-competitive behaviour. This applies in particular to agreements and arrangements aimed at or resulting in the fixing of prices, price components or production capacities, the division of markets or customers or the boycott of a customer or other market participants.
- In discussions or other contacts with competitors, no information about confidential matters such as prices, price components, terms and conditions of sale, costs, production capacities, capacity utilization, inventories or similar confidential information may be exchanged - not even unilaterally.

7. Donations and sponsoring

Donations of money and goods in accordance with the statutory purposes, especially to support



humanitarian and social projects as well as cultural and scientific purposes and for education, are permitted.

Under no circumstances may such financial contributions be made in order to circumvent other provisions of the Compliance Guidelines or guidelines in force within the CDG. The CDG does not make any donations or other financial contributions to politicians, political parties, party-affiliated organizations or political organizations that do not exclusively pursue social causes. This also includes advertisements in party media or in the media of party-affiliated organizations.

8. Conflicts of interest

8.1. Conflicts of interest among employees

In the course of their business activities, employees may find themselves in situations where their personal or economic interests conflict or may conflict with the interests of the CDG. In such situations, the CDG expects its employees to act exclusively in the interests of the CDG. Since such conflicts of interest cannot always be ruled out, the CDG obligates its employees to deal transparently with such issues. Every employee is committed to disclose current or potential conflicts of interest, even if only the appearance of such a conflict of interest could arise, immediately and in full to the respective superior without being asked and, if necessary, to request special approval.

Conflicts of interest may arise in particular in connection with the following aspects:

- Secondary activities may contradict the duties in the CDG or lead to a collision of interests. They are therefore prohibited in the case of secondary employment with other central research funding institutions or central research institutions, with CDG member companies and with business partners, in particular customers or suppliers, or require prior written approval by the Secretary General or the President in any other case, in particular for hosts of CD Laboratories and JR Centres. Employees are generally required to report secondary employment. Accepting such secondary activities as described above may constitute an impermissible acceptance of a gift or favour.
- Economic involvement (in the form of a shareholding, supervisory board activity, or similar) with member companies or with business partners of the CDG, in particular with customers or suppliers, is not permitted (with the exception of small shareholdings in listed companies, insofar as they correspond to normal asset management). Such participations by close relatives shall be brought to the attention of the Secretary General in writing. Close relatives include the employee's spouse or partner, his/her parents, siblings and children as well as other persons, provided they have been living in the employee's household for at least one year.

Close relatives of CDG staff are of course free to work for other central research funding organizations or central research organizations, CDG member companies, hosts of CD Laboratories and JR Centres, or customers and suppliers of the CDG. However, it is in the interest of the CDG to ensure that the interests of the CDG are not affected by such employment relationships. Such impairments may result in particular from:

- the disclosure of confidential information
- a general impairment of objectivity in decision-making.

The employees of the CDG are therefore obliged to ensure in an appropriate manner that the employment of relatives described above does not influence their own duty of loyalty to the CDG and does not influence the CDG as a whole. CDG employees shall avoid participating in and influencing business transactions with institutions or companies in which close relatives are involved in the same business transactions (e.g. checking the proper use of grant funds, approving invoices). If participation in such business cases cannot be avoided, employees must inform their supervisor in writing in good time before the start of processing the respective business case.

If employees purchase goods or services (including medical services) from CDG member companies, customers or suppliers of the CDG, or from persons working for a CD Laboratory or JR Centre (e.g. Heads of Laboratory), the usual market price must be paid. Discounts and other benefits offered may only be claimed if they are granted to all CDG employees and have been approved by the Secretary General or the President.

8.2. Conflicts of interest among board members and reviewers

Board members and reviewers of the CDG undertake to report any personal or institutional bias or conflict of interest. Reviewers who are biased with regard to an application to be reviewed may not review it. Members of the boards who are biased may be asked for their professional opinion, but must abstain from voting in the respective votes.

Reasons for bias can be:

- affiliation with the institute/clinic/university of applied sciences at which the CD Laboratory/JR Centre is to be established or has been established.
- cooperation or joint publications with the Head or with employees of the CD Laboratory / JR Centre (within the last five years)
- affiliation with commercial partners of the CD Laboratory / JR Centre concerned
- family or personal reasons
- scientific disagreements



9. Data protection

In the course of their work for the CDG, the CDG, its board members and the experts commissioned by it, process the personal data of employees, applicants, customers, suppliers and other business partners. The CDG takes the protection of personal data very seriously. The processing of personal data (such as the collection, use, disclosure, publication and storage) is only permitted in compliance with the statutory provisions, including the General Data Protection Regulation GDPR (EU) and the CDG data protection guidelines. All employees, board members and experts commissioned by the CDG must handle personal data carefully and conscientiously.

10. Confidential information

Confidential information of any kind obtained in the course of work for the CDG - this also includes information outside the CDG's own sphere of activity - may neither be used for the pursuit of the CDG's own interests nor made accessible for the use of the interests of third parties.

Confidential information includes, but is not limited to, all oral or written information that is not publicly available or is marked as confidential or should be regarded as confidential by its nature and whose disclosure or transfer to third parties could harm the interests of the CDG or its partners.

Exempted from this is information and results

- for which an agreement to the contrary has been expressly made,
- or which were already known before the CDG received the information or before the start of the activity mentioned or were subsequently disclosed by authorised third parties,
- or which are the general state of the art,
- or which are or become generally known without violation of this guideline.

It must be ensured that CDG-related information of any kind (documents, files, applications, etc., including copies thereof on paper as well as electronic or other data carriers) is always kept safe and that no third parties are allowed to inspect or access it.

Strict confidentiality must be maintained with regard to all business and trade secrets as well as confidential information, in particular information from research funding applications, information in the course of assessments, evaluations or the examination of the proper use of funding as well as information from board meetings, regardless of the source of the information. If external partners (e.g. service providers, suppliers, experts) are involved, appropriate confidentiality agreements must be concluded.



The obligation to maintain confidentiality shall continue to apply without restriction even after the CDG's activities have ended and ends only when the information in question becomes public knowledge or is lawfully accessible through other sources..

11th Procedure in the event of misconduct

It may happen that employees or board members of the CDG discover violations of the provisions of the Compliance Policy, of other internal guidelines and regulations or of statutory provisions.

If employees or board members of the CDG identify such misconduct, they are free to report it immediately.

The following options are available for this purpose:

- Information to the direct supervisor
- Information to the Secretary General
- Information to one or more members of the Executive Committee
- Information to one or more members of the Executive Board

Compliance violations should primarily be reported openly, i.e., by stating the name of the whistleblower. All reports received will be carefully investigated and, if requested, treated confidentially. In order to promote open and trusting communication, it is expressly stated that employees who report identified violations of laws, the Compliance Guideline or other internal guidelines and regulations will under no circumstances suffer negative consequences of any kind. This also applies to other persons who contribute important information to the investigation of such misconduct.

However, CDG expressly reserves the right to take disciplinary action against employees or external persons who intentionally or grossly negligently make false accusations, or to claim damages.

12th Code of Conduct for the Prevention of Corruption in the Public Sector

The [Code of Conduct for the Prevention of Corruption in the Public Sector \(oeffentlicherdienst.gv.at\)](https://oeffentlicherdienst.gv.at), published by the Federal Chancellery, must be observed by all CDG employees.

The corresponding e-learning training at:

<https://forms.office.com/e/uzb59eNfts?origin=IprLink> must be completed by every employee of the CDG.

13th Code of Practice for Integrity and Ethics in Science and Research

Recipients of CDG grants are instructed to follow the [Code of Practice for Integrity and Ethics in Science \(oeawi.at\)](https://oeawi.at).

14. Implementation

The employees are instructed to adhere to the Compliance Guideline. The content is made clear to them in compliance training sessions. Special attention is paid to precautionary measures and information.

The members of the CDG Executive Board declare their adherence to the Compliance Guideline by means of a consensual resolution of the same in a voluntary commitment. The other members of the bodies (General Assembly, Scientific Board, Strategic Advisory Board) declare compliance with the Compliance Guideline by taking note of it in a voluntary commitment.

The CDG Compliance Guideline is published on the CDG website.

15. Further documentation

The Compliance Guideline contains general principles of conduct that serve as the basis for the CDG's detailed policies. These guidelines include in particular:

- the statutes of the CDG
- directives or documents issued by the Ministry of Economy that relate to the CDG's funding model
- the CDG Organization Manual
- the CDG's Data Protection Manual
- the [Code of Conduct for the Prevention of Corruption of the Federal Government \(oeffentlicherdienst.gv.at\)](https://oeffentlicherdienst.gv.at)
- the [Practice Guide on Integrity and Ethics in Science \(oeawi.at\)](https://oeawi.at)

16. Period of validity and amendment

The Compliance Guideline was adopted by the CDG Executive Board on 27.09.2024 and shall apply in its present form until further notice.