

Code of Conduct and Good Governance

Centre for Genomic Regulation

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Summary

What and Who: Framework setting out standards of behaviour for all CRG members

The CRG Code of Conduct and Good Governance (referred to as “the Code”) establishes the framework for the expected professional behaviour of all CRG employees, including students and collaborators with a collaboration agreement with the CRG (referred to as “CRG members”). It also establishes good governance principles for the members of the CRG governing and executive bodies. We encourage our collaborating companies and institutions, as well as outsourced workers carrying out similar duties to our internal employees, to adhere to the principles of the Code.

Why: Excellence in research in line with CRG’s values

As a scientific research institution under considerable public scrutiny, we must ensure that our professional activities are transparent and are held to a high standard of integrity. This Code addresses the expectations to all CRG members in line with our [Mission, Goals](#) and [Values](#), while conducting their professional activities on behalf of the CRG. As a research institution employing a diverse personnel we value and support diversity in research and among our employees. The present Code establishes basic principles for promoting a positive working environment.

CRG’s values

- ✓ Excellence: Striving for the highest standards in our scientific and administrative activities.
- ✓ Scientific independence: Conducting science with scientific independence and the freedom to publicly present hypotheses and results.
- ✓ Integrity, ethics and social responsibility: Acting with honesty, respect and adhering to ethical standards and in a socially responsible manner.
- ✓ Equal opportunities: Providing equal opportunities without discrimination and fostering a diverse and inclusive environment.
- ✓ Sustainability: Aiming for responsible use of resources and promoting long-term sustainable practices.
- ✓ Transparency: Openness, transparency and good governance principles to promote accountability and trust in our operations.

All CRG members are encouraged to conduct themselves in line with the above values, which includes interacting with peers and colleagues in a professional, collaborative and supporting manner and without discrimination.

In particular, all CRG employees must:

- ✓ Follow the accepted ethical standards in research and other activities as defined by the [PRBB Code of Good Scientific Practice](#)
- ✓ Comply with the established [Internal Staff Regulations, Health and Safety Regulations, Intellectual Property and Technology Transfer Policy](#) and other internal policies
- ✓ Report potential conflicts of interest, including personal and financial
- ✓ Protect personal, confidential and research data when required by law
- ✓ Use the institute’s funds and resources in an efficient and cost-effective manner
- ✓ Follow the good governance principles as established by law and this Code (Members of the Board of Trustees and Executive Board)

How: Implementing the Code and reporting misuse

The Code has been approved by the CRG Executive Board and Board of Trustees and is complemented by internal policies and procedures. All employees are encouraged, and when relevant obligated, to know and follow those rules that apply to their work. Violations or misuse of this Code should be reported.

1 Integrity

We support and foster a culture of open communication, transparency, trust, respect and mutual cooperation, where diverse perspectives and views are encouraged and valued. Intellectual exchanges and synergies are encouraged within the institute, with the aim to contribute towards scientific excellence and an improved community.

Responsibilities of CRG team leaders

Executive Board Members and CRG members with supervision duties (such as Principal Investigators, Head of Units and Heads of Administration Departments and other team leaders) are responsible for setting an appropriate tone, conveying the importance of integrity and setting an example with their own behaviour.

Respect for CRG's reputation

CRG members should respect, preserve and foster the reputation of the CRG. The free expression of personal opinion of CRG members is not restricted as long as it is clearly stated that they do not reflect the views of the institute.

1.1 Responsible research

The CRG strives to perform its research in a responsible manner, conforming with the expected standards of research integrity and contributing to the training of responsible scientists.

1.1.1 Research integrity

CRG members are bound by the [PRBB Code of Good Scientific Practice](#), which defines and strictly bans scientific misconduct. Following these guidelines promotes better science and CRG members are expected to be familiar and comply with the PRBB Code.

CRG members should follow the [Intellectual Property and Technology Transfer Policy](#) and report research with technology transfer potential to the Technology and Business Development Office.

1.1.2 Bioethics

CRG members are expected to conform to all existing ethical practices in research, which are outlined in the [PRBB Code of Good Scientific Practice](#). This includes work on human and animal subjects, and other work requiring ethical approval.

1.1.3 Health and safety

The CRG members must follow safety guidelines outlined in the CRG [Health and Safety Regulations](#). The CRG's Health and Safety Office is responsible for overseeing health and safety regulations, including handling of dangerous waste and chemicals, and provides relevant training. CRG members must avoid endangering themselves and are obliged to safeguard the welfare of staff under their supervision, contractors and visitors. CRG members are responsible for reporting to the Health and Safety Office any hazards related to health and safety at work, cryogenic safety and radioactivity or toxic waste without delay so that necessary measures can be taken.

1.2 Integrity in internal and external relationships

1.2.1 Providing fair and equal opportunities and respecting diversity

The CRG strives to create an open and fair environment with equal opportunity for all workers. Our HR policies on recruitment and employment, internal promotions and training programmes are designed to foster such an environment in accordance with the principles of the [European](#)

[Charter for Researchers and Code of Conduct for Recruitment](#). As an equal opportunity employer of skilled, competent, and responsible people, the CRG recruits, employs, trains, and promotes without regard to race, religion, citizenship, age, gender, sexual orientation, marital status, disability, or any other potentially discriminatory criteria, in accordance with all applicable laws and regulations. Harassment or discrimination will not be tolerated. CRG members should follow the [CRG Protocol for preventing and acting against harassment](#).

1.2.2 Relationships with companies and collaborating organisations

Personal interests of CRG members may not influence professional decisions with companies and with collaborating profit and non-profit organisations. We oppose illegal or inhumane labour practices and expect our suppliers and partners to do the same.

Suppliers and contractors: Suppliers and contractors are selected based on quality and price, goods and services are purchased in accordance with the applicable public procurement regulations, applicable legislation and the CRG Public Procurement Internal Regulations. Personal interests cannot influence procurement decisions.

Collaborating organisations: Collaboration is important to the CRG research activities and provides the platform for ambitious projects, addressing global challenges, advancing and transferring knowledge, and fostering mobility. The CRG has established, and continues to foster, collaborations and alliances with research institutes and organisations in Spain, Europe, and throughout the world. The CRG endorses the principles of the [Montreal Statements on Research Integrity in Cross-Boundary Research Collaborations](#).

Fundraising activities and donors: To ensure society's trust in our work, fundraising activities at the CRG are based on honesty, respect, integrity and transparency. Donations and funds raised are used exclusively for activities related to the CRG's mission and goals, following the fundraising guidelines outlined in the [Spanish Fundraising Association Ethical Code of Fundraising Practice](#). In line with these principles, donors' wishes regarding the use of the funds and the confidentiality of their personal information are respected and proper transparency and accountability of funds is ensured. Applicable legislation on the prevention of money laundering and the funding of terrorism is observed when accepting private or corporate donations.

1.2.3 Confidentiality and transparency in data handling

We protect personal and confidential information to which we have access, except when disclosure is required by law. Procedures and controls for the protection of personal and confidential information are in place, including the [PRBB Code of Good Scientific Practice](#), which includes guidance on scientific data usage. The CRG members must follow the [Policy for Research Data Management \(RDM\)](#) and its implementing guidelines.

Data protection: In accordance with legislation on the protection of personal data, personal details made available to the CRG are used solely for the purposes for which they were obtained. CRG members who have access to personal data cannot disclose them, except when required by law.

Data security: We protect the institution's data with all the appropriate technical and organisational means at our disposal to prevent unauthorised access, misuse or loss.

Maintaining confidentiality: CRG members are required to protect confidential information, internal or third-party. This obligation continues even when the member is no longer employed by CRG.

Transparency: We are transparent in our operations and publish truthful information about the institute on [CRG Transparency Portal](#), in line with the applicable regulations.

1.2.4 Preventing conflicts of interest

CRG members should avoid situations with conflicting personal or financial interests as established by the [CRG Conflict of Interest Policy](#). A conflict of interest might arise through secondary employment or contractual obligations with third parties, the use of institutional assets, professional interaction with close relatives, financial interests or accepting gifts from third parties. As a general rule, gifts cannot be accepted, except in case of non-venal courtesy, official or protocol gifts, which will be treated according to the guidelines applicable to the public sector. Any actual or potential conflicts of interest must be reported in accordance with the procedure established by the [CRG Conflict of Interest Policy](#).

1.2.5 Environmental responsibility

The CRG is committed to sustainability and protecting the environment, and strives to minimize its environmental footprint. CRG has made voluntary commitments to minimise the environmental impact of its activities which go beyond its legal obligations, including the development of energy and waste management systems. The waste system particularly focuses on managing the hazardous waste generated by CRG.

All CRG members are encouraged to use energy resources responsibly and to incorporate the principles of sustainability and whenever possible to follow environmentally friendly practices.

1.3 Financial integrity

CRG members are required to use the institute's funds and resources in an effective, efficient and cost-effective manner in line with the mission and objectives of CRG. Staff are required to report any significant waste or misuse of the funds and resources entrusted to CRG. The misuse of funds and resources, deliberate or otherwise, is a serious offence. The [CRG Anti-fraud Measures Plan \(AMP\)](#) has been adopted to ensure that funds received are used in accordance with applicable rules, in particular as regards the prevention, detection and correction of fraud, corruption, double funding and conflicts of interest. We have procedures and controls to guarantee financial integrity.

1.3.1 Budget holders' responsibilities

Budget holders are responsible for funds and resources allocated to them in line with relevant regulations. This includes ensuring that goods and services are delivered on time and are of acceptable quality.

1.3.2 Administration personnel's responsibilities

Administration personnel are responsible for ensuring proper bookkeeping, ensuring that records of transactions are complete, timely and, to the best of their knowledge, accurate, and produced in accordance with current regulations.

Internal protocols ensure that funds are received from lawful sources in accordance with legislation on the prevention of money laundering and the funding of terrorism. CRG follows the ethical guidelines on financial investments for non-profit organisations issued by the Spanish National Securities Market Commission, based on the criteria of security, liquidity, profitability, diversification, non-speculation and ethical values.

2 Good governance

The actions of the members of the governing body (Board of Trustees) and legal representatives of CRG (Director and Administrative Director) defined by the CRG [Bylaws](#) must be based on the principles of transparency and fairness and in accordance with relevant legislation. The governing members must:

- be transparent in their activities and decisions
- act impartially and independently, avoiding conflicts of interest
- ensure equal treatment and opportunities
- use public resources according to the budget and grants regulations and for the purposes for which they have been awarded
- carry out their duties on a full-time basis in accordance with the provisions of the legislation on the compatibility of employment with public authorities¹
- carry out their duties and use information to which they have access exclusively in the public interest
- show commitment to their work and to providing quality services, demonstrate good faith and reject gifts, favours or services that may be offered because of the position they occupy

Members of the Executive Board of the CRG shall exercise their responsibilities in the interest of the institution, attend its meetings regularly and actively participate in its proceedings and decisions and provide an environment for discussion of the decisions at the faculty level.

We also encourage the members of the advisory boards of the CRG (Scientific Advisory Board and Business Board) to adhere to the principles of the Code.

3 Compliance with the Code and reporting misconduct

We adhere to the standards of conduct and strive to behave with integrity and in accordance with applicable regulations and internal policies and procedures. Whenever appropriate, CRG members are encouraged to speak directly, respectfully and privately to the involved individuals to resolve minor behavioural or communication issues. However, in instances of gross violations of research or safety standards or misuse of resources the CRG members should follow established procedures for reporting misconduct. Reporting of misconduct cannot be used as a mechanism for voicing employee grievances, which should be addressed to a direct superior or HR.

Compliance with the Code is ensured through the development of a Compliance programme at CRG according to the terms established in the relevant Compliance policies and internal regulations coordinated by the Coordinator of the Compliance Committee or Compliance Officer². The Code will be disseminated to CRG members and published on the CRG Website.

¹ Occasional research activities, including technical and scientific consulting activities are permitted.

² Designated by the Board of Trustees, the Coordinator of the Compliance Committee is responsible for setting-up the Compliance programme, reviewing, evaluating and reporting compliance issues/concerns and providing guidance to the Director, Administrative Director and Board of Trustees on matters regarding compliance. She/he is authorised to implement all necessary measures to ensure the objectives of an effective Compliance programme are achieved. The Coordinator of the Compliance Committee is the Head of the Legal Department.

Consequences of misconduct: Violations of the Code may result in disciplinary sanctions as established by the [Internal Staff Regulations³](#), depending on the nature and seriousness of the misconduct or violation.

Reporting misconduct: If a CRG member becomes aware of a possible violation of the principles of the Code they are expected to:

1. Speak with the direct superior, another senior member of the CRG or HR.
2. Contact the Compliance Committee through the CRG registered office or by email at compliance@crg.eu as stated in the regulations on the Compliance communication channels. Suspected wrongdoing or unethical activities affecting the members of the Compliance Committee must be reported to the relevant direct supervisor.

The specific [procedure in cases of alleged research misconduct](#) must be followed.

Handling reported instances of misconduct: An impartial committee shall investigate the reported suspected wrongdoing or unethical activities confidentially establishing the facts and recommending appropriate action following a due process and fair treatment of all parties involved.

Where the issue cannot be resolved by the means described above, the ad-hoc Compliance committee will be set up in consultation with the Director or Administrative Director (if they are not involved in the case) to investigate the alleged misconduct. The ad-hoc Compliance Committee shall be composed of the members identified in the Compliance Committee regulations, as well as any appropriate internal member or external expert with relevant expertise in the matter concerned as requested by the committee.

Protection of whistle-blowers and preventing the spread of false information: Whistle-blowers will be protected and acts of retaliation or revenge against any CRG member who reports violation of this Code will be themselves considered a violation of the Code. Persons who intentionally spread false information about CRG members are guilty of misconduct following the [Internal Staff Regulations](#).

4 Questions and comments

Making sure the Code is widely understood: Before starting at the CRG, all members are required to read the Code, ask questions if something is not clear, and sign an acknowledgement that they have understood it. CRG members are expected to comply with the Code both in letter and spirit.

Questions about everyday operations: Ethical or behavioural questions that come up in the day- to-day work that are not covered by this Code or by the internal policies or procedures should be discussed with the direct superior, another senior member or HR.

Questions and comments regarding monitoring and compliance: Questions and comments regarding monitoring or compliance can be addressed to the Compliance Committee through the CRG registered office or by the email compliance@crg.eu. If a waiver of, or amendment to, the Code seems to be necessary, please contact the Coordinator of the Compliance Committee.

Internal policies and procedures and contact details: Specific internal policies and procedures, and contact details of the Coordinator of the Compliance Committee and its members are available on the Intranet.

³ This applies to employees and students with a work contract with CRG.

Version	Date	Aproved by	Changes
V.1	25/11/2015	Managing Director – Executive Board	
V.2	15/12/2022	Administrative Director – Board of Trustees	Adaptation of the Code to the CRG policies and regulations on Compliance and update of references to other specific policies implemented at CRG.