



CODE OF ETHICS

institute
imdea
materials



COMMITMENT ON THE PART OF MANAGEMENT

1. Active commitment and oversight by IMDEA Materials' governing body and management is key to achieve the Institute's goal of implementing and managing an effective regulatory compliance system. Inappropriate behavior by just one employee, professional or collaborator of the Institute tarnishes our image and reputation and can result in significant economic damage. We must therefore take active steps to prevent and avoid such a situation.

Accordingly, the Board of Trustees, Management and each and every one of the researchers, staff, professionals, collaborators and other stakeholders must assume the commitment and responsibility for developing a strong culture of compliance within IMDEA Materials. In this regard, the Management assumes leadership with it.

2. The Code of Ethics shall serve as a guide for conducting internal and external relations. The objectives of the Code include the following:
 - Strengthen the values that are the distinctive features of the Institute.
 - Disseminate the fundamental principles and standards of behaviour for senior executives, researchers, professionals and collaborators in the performance of their activities.
 - Ensure ethical and responsible conduct in the performance of their duties and with the community.



OUR ETHICAL CULTURE

1. Our Code of Ethics reflects the Institute's commitment to the principles of ethics and transparency in all its fields of action, establishing a set of principles and conduct guidelines aimed at guaranteeing the ethical and responsible behaviour of directors, managers and employees in the performance of their duties while implementing a culture of compliance.
2. With respect to its scope of application, our Code of Ethics comprises the principles and standards that the Institute's directors, managers and employees should observe in our internal relations, in our relations with interested parties and the scientific community, when handling the assets that are placed at our disposal, and in our relationship with competitors and the environment. The competent internal bodies have been set up to oversee the application of and compliance with the Code as well as the imposition of sanctions in the event of violations.
3. Our Code applies to all directors, managers and employees bound to the Institute by a labour or business relationship of any kind. For purposes of this Code, all the Institute's researchers are employees. The Code also applies to the professionals of interested parties that collaborate in or are subcontracted for the provision of services of any kind to the Institute and its facilities.
4. **Our MISSION** is to conduct research of excellence in materials science in order to contribute to tackling the challenges of society and to foster the sustainable development of the region of Madrid.

5. Our **VISION** is to be a leading research institute, acknowledged internationally for its excellence in materials science and its contribution to the transformation of society.
6. Our **VALUES** are:
- **Spirit of cooperation:** In each situation the manner is sought to contribute to improving whatever we are working on.
 - **Excellence:** This is our set of practices and behaviours established to attain the highest levels of quality with rigour and honesty.
 - **Transparency:** Our compliance with the standards and expectations of the persons and organisations in everything concerning the activity, governance and use of the resources is clearly demonstrated.
 - **Integrity:** We act fairly and coherently in accordance with ethical principles.
 - **Commitment:** We involve and identify persons with the Institute's mission.
 - **Flexibility:** We adapt and quickly respond to changes and needs of the environment in consonance with our mission.
 - **Diversity:** We know that this is where the talent is and we are ready to manage it.





OUR COMMITMENTS TO RESPONSIBLE CONDUCT AND PRACTICES

1. **Compliance.** This is the basic premise of our Code. Directors, managers and employees undertake to comply with this Code of Ethics and its policies as well as all the relevant laws and regulations, and the procedures and instructions that are approved to develop the foregoing.
2. **Upright professional conduct.** Our professional activities shall be in consonance with the criteria of professionalism, integrity and self-regulation in our actions and decisions.
3. **Commitment to human rights.** Respect for the dignity of persons and their fundamental rights constitutes our commitment to conduct in our capacity as directors, managers and employees.
4. **Respect for persons.** None of us, either directors, managers and/or employees, accept any kind of discriminatory conduct due to race, ethnical origin, gender, religion, sexual orientation, political ideas, convictions, social origin, family circumstances or disability, either in the treatment given in the Institution or in professional decisions or in relations with third parties.

5. **Right to privacy and personal data protection.** When processing personal data, we are committed to the principles of lawfulness, fairness, transparency, purpose limitation, data minimisation, accuracy, storage limitation, integrity, confidentiality and accountability, as well as attending to the exercise of the rights of data subjects. Directors, managers and employees undertake to respect the personal and family privacy of all persons, whether directors, managers, employees and customers or any other persons to whose data we might have access deriving from our activity in the Institute.
6. **Equality of opportunity and non-discrimination.** We, directors, managers and employees, enjoy equal opportunities to develop our professional careers regardless of our age, sex, civil status, race, nationality or beliefs. The Institute's management is committed to the development of an effective equality of opportunity policy so that we may all develop our professional activity based on the principle of merit.
7. **Protection of health and physical integrity.** The Institute's management is committed to making available to directors, managers and employees all the safety elements that might be necessary and concordant with the activity that we perform, creating occupational safety and health policies of mandatory compliance by all directors, managers and employees, while fostering the preventive measures that are applicable to each case. The Institute has a Safety Management System and an Occupational Risk Prevention Plan, which cover all aspects of the Institute concerning the protection of persons, assets and environs from innate or activity-related risks, focused on minimizing or adequately controlling the risks and administering all the relevant prevention laws and regulations.
8. **Recruitment process and assessment of professionals and researchers.** The Institute has a rigorous and impartial procedure for recruitment, hiring and separation of its directors, managers and employees, in strict accordance with the academic, personal and professional merits of the candidates and the needs of the Institute.
9. **Exercise of outside activities and business opportunities.** We, directors, managers and employees, dedicate to the Institute all our professional capacity and effort necessary for the exercise of our functions. Within the framework of the relevant laws and regulations, we perform our work exclusively for the Institute, except by agreement to the contrary or express authorisation. We cannot take advantage of any business opportunities, of which we might come to know through our work, to our own benefit or to that of a person related to us. Neither may we use the name of the IMDEA MATERIALS Institute, nor invoke our work relationship therewith for purposes of transacting business operations on our own account or on that of persons related thereto.



10. **Prevention of criminal conduct.** We, directors, managers and employees, must avoid the conduct of unethical practices for purposes of obtaining a profit or benefit for the Institute or ourselves, particularly where said practices constitute a crime. Directors, managers and employees shall also observe and comply with the provisions of the Criminal Risk Prevention Plan, which shall be disseminated by the Management and be especially understood by those of us to whom it is applicable.
11. **Use and protection of the Institute's assets.** The Institute places at our disposal the resources necessary for the performance of our professional activity. We, directors, managers and employees, must use the Institute's resources in a responsible and efficient manner that is appropriate to our work. We should protect and conserve them from any inappropriate use that might damage the Institute's interests. We undertake to not use programs or applications, the use of which might be unlawful and that might damage the image and reputation of the IMDEA MATERIALS Institute. We undertake to not make use of, download or distribute illegal or offensive content or content that might breach "service agreements" with third parties.
12. **Treatment of grants and public aid.** We, directors, managers and employees, are bound and committed to not obtaining any kind of public aid, tax or social benefit or public grants fraudulently or by simulation or evasion of the law. All documentation that we submit to justify grants or aid requested is strictly veracious, informing the authorities in an honest, upright and transparent manner of the concurrence of the conditions required for concession, while no kind of concealment that might impede the concession of a grant or aid shall be admitted. Moreover, the grant shall be used exclusively for the purposes for which it is conceded.
13. **Management of economic-financial information.** The Institute's economic-financial information, particularly the annual accounts, shall give a true and fair view of its economic, financial and wealth status in accordance with the generally accepted accounting principles and the standards applicable thereto. For the purpose hereof, none of us, director, manager or employee, shall conceal or misrepresent the information of the Institute's accounting records and reports, which shall be complete, accurate and veracious.

14. **Pursuance of best tax and social security practices.** We, directors, managers and employees, undertake and represent our commitment to contribute to the sustainability of public expenses by assuming best tax and social security practices.
15. **Protection and care of the Institute's brand, image and reputation.** The IMDEA MATERIALS Institute considers its corporate reputation and image to be one of its most valuable assets to preserve the confidence of its trustees, directors and managers, employees, customers, suppliers, authorities and society in general. We, directors, managers and employees, undertake to make every endeavour to preserve the Institute's image and reputation in all our professional actions.
16. **Conflict of Interest.** A conflict of interest shall be considered to exist in situations where the personal interest of a director, manager or employee collide direct or indirectly with the interest of the IMDEA MATERIALS Institute. The directors, managers and employees act in accordance with the principles of independence, abstention and communication. We are not involved, personally or through family, in any economic transaction or operation in which the Institute might be a party. We do not negotiate or enter into contracts, either personally or through a related person, on behalf of the Institute with persons related to ourselves, or with legal entities in which we might hold a managerial position, whether as shareholder or managing director. We are not, for example, shareholder, managing director or board director of customers, suppliers or any of the Institute's interested parties. On no account may any operations or activities that involve or might involve a conflict of interest be transacted within the Institute unless on prior written authorisation from the Institute's management or functional management that in each case might be established by the Ethics and Compliance Committee.
17. **Confidentiality of information.** The Institute and ourselves, as directors, managers and employees, are committed to putting in place sufficient resources and applying the procedures established to protect the Institute's reserved and confidential information, recorded on paper and electronic media, from any unauthorised internal or external access risk, manipulation or destruction, whether intended or accidental. For said purpose, we shall keep the content of our work in our relations with third parties confidential.
18. **Protection of intellectual and industrial property.** The Institute holds title to the industrial and intellectual property rights, and the exploitation thereof, deriving from its activity. Directors, managers and employees, undertake to not make copies of software, except for backup copies or to create files. We do not make copies of internally designed computer programs. We do not obtain confidential information from third parties by inadequate media nor do we disseminate it without authorisation. We only use the computers made available by the Institute, and the programs and applications acquired and provided by the Institute. Software is only installed by personnel designated according to their IT expertise. We are expressly prohibited from installing, storing and using in the Institute's PCs and computer equipment any software not provided by the Institute. Particularly, and by way of illustration, the installation and/or use of games, music or utilities programs is expressly prohibited.



OUR PRINCIPLES OF ACTION VIS-À-VIS OUR ENVIRONMENT

1. **Identification of the interested parties.** The interested parties identified by the Institute are the following: trustees, members of the Scientific Council, Community of Madrid, directors and managers, employees, external researchers, students, IMDEA Foundations, suppliers and service providers, State Public Administration, European Union, customers, Universities, other R&D Centres, Laboratory Network, Getafe Town Council, audit and inspection bodies, collaborators and society in general.
2. **Vis-à-vis the scientific community.** The Mission, Vision and Values of the IMDEA MATERIALS Institute inspire its principles of action vis-à-vis the Scientific Community of which it forms part. This is brought to fruition by doing research of excellence in materials science. The Institute promotes the value of collaboration and the quality of research while it proposes models for the organisation of said research. It transfers the importance of this to society as a whole, fostering dialogue between the economic and social agents, particularly, while offering its advice and its experience in research activities.

3. **Vis-à-vis our customers and collaborators.** The Institute conscientiously pursues its activity in accordance with the law, and it does not accept deceitful, fraudulent or malicious conduct that might enable the Institute to obtain undue advantages. There is a commitment to providing our customers and collaborators with services that meet their needs, contributing to the creation of a climate of mutual trust, while attending to any complaints that might be made.
4. **Mutual commitment vis-à-vis our suppliers and service providers.** The Institute strives to establish relations based on trust and mutual benefit with its suppliers and service providers. The procurement decisions of the Institute are made according to the contracting process established. In this respect, it is mandatory and innate to our ethical culture that directors, managers and employees should apply the basic principles of public contracting that are currently applicable.
5. **Vis-à-vis our competitors.** The Institute pursues its activities fairly and does not engage in deceitful or derisory advertising in regard to the competition or third parties. Any information obtained on third parties, including information on the competition, is done in a lawful manner.
6. **Transparency vis-à-vis our trustees.** The Institute is committed to the purpose of continual creation of value for its trustees and shall place at their disposal on an ongoing basis communication and consultation channels which will provide them with adequate, useful and complete information about the development of the Institute.
7. **Collaboration with the public administrations.** The professional activities of the IMDEA MATERIALS Institute depend to a large extent on its relations with the public administrations of its most immediate environment, Europe and other countries in which it pursues its activities. Its relations with the authorities, public bodies, national or international public servants and public administrations in general are pursued in accordance with the law, integrity, collaboration, cooperation and transparency.





8. **Participation in Society.** The IMDEA MATERIALS Institute and its directors, managers and employees wish to contribute so that our activities have a positive impact on society. Thus, by social commitment, the Institute, as a development agent in the region in which it is located, is committed to socially responsible action, in compliance with the law and, in particular, it assumes the responsibility of respecting the cultural diversity and the customs and principles in place between persons and the community affected by its activity.
9. **Protection of the environment.** The Institute follows the procedures and recommendations to mitigate any environmental impact of its activities on its environs and to comply with all the relevant environmental legislation. It thus endeavours to reduce the use of toxic, pollutant or hazardous materials and products, replacing them with others that are less aggressive to the natural environment and people.
10. **Relations with political parties.** The Institute's general policy is that of not extending contributions to political organisations, parties or committees or politicians in order to promote private political interests. On no account may any director, manager or employee link and/or relate the position we hold in the Institute or the brands with which it is identified with the political activities in which we might individually and in a private capacity take part.
11. **Media relations and information transparency.** The Institute communicates its activities and projects in a truthful, adequate, useful and consistent manner. The transparency of the information to be disseminated is a basic principle that governs the action of directors, managers and employees.



OUR COMMITMENT TO COMPLIANCE

1. **Ethics and Compliance Committee.** The Ethics and Compliance Committee is a collegial body of an internal and permanent nature, having competences in the compliance with and application of the Code of Ethics and the Compliance Management System. The composition, operation and functions of this Committee shall be overseen directly by the Institute's management in accordance with the internal rules governing same. The Committee has the material and human resources necessary to perform its functions and its resolutions shall be binding on the Institute, its directors, managers and employees.
2. **Acceptance and responsible compliance.** This Code of Ethics is binding on all directors, managers and employees of the IMDEA MATERIALS Institute and on third parties that have voluntarily undertaken to comply therewith. All directors, managers and employees must expressly accept the conduct laid down hereunder.
3. **Communication and training.** The Ethics and Compliance Committee is responsible for promoting the dissemination of the content of the Code of Ethics among directors, managers and employees, as well as the other interested parties where it deems necessary. An Annual communication and internal training action plan for directors, managers and employees shall be prepared and approved. Specialized training shall be given to directors, managers and employees who, due to the activities they perform, require more specific and detailed knowledge of the model of conduct that is expected and the inherent risks.

4. **Ethics Channel.** This is a transparent channel for directors, managers and employees to communicate behaviours that could involve the commission of an irregularity or of an act contrary to the law or to the rules of the Code of Ethics governing conduct or for consulting queries that might arise about the interpretation thereof. The rules governing the Ethics and Compliance Committee and the Ethics Channel set out the Channel's scope of application, the Committee's competences and, where necessary, those of other governing bodies involved in its management, the access and procedure rules and any other matters in relation to the Ethics Channel necessary for the correct implementation and functioning thereof.
5. **Noncompliance: sanctions.** The Institute shall put into practice the measures necessary for the effective application of the Code of Ethics, based on the principle that there is no tolerance for unethical behaviours, unlawful practices, inappropriate professional conduct or violations of the relevant laws. Where the Ethics and Compliance Committee determines that a director, manager or employee has demonstrated conduct that might contravene the Code of Ethics, its rules of implementation or the law in general, it shall commend as a function to human resources the application of disciplinary measures in accordance with the rules governing misconduct and sanctions laid down by labour law and/or other relevant laws and regulations.
6. **Updating.** This Code of Ethics may be amended or updated from time to time on the criteria of the Institute.
7. **Approval and effect.** This Code of Ethics was approved by the executive committee of the IMDEA MATERIALS Institute in May 2019, and has since been in effect for all of the Institute's directors, managers and employees.



CODE OF ETHICS

institute
idea
materials