

[Stamp:]

Mossakowski

MEDICAL RESEARCH INSTITUTE,

Polish Academy of Sciences

02-106 Warsaw, ul. A. Pawińskiego 5

phone: 22 668-52-50, fax 22 668-55-32

NIP [Tax ID No.] 525-000-81-69, REGON [Business ID No.]

000326463

Annex to Order No. 12/2020
of the Director of the Mossakowski Medical Research
Institute, Polish Academy of Sciences

Anti-corruption policy of the Mossakowski Medical Research Institute, Polish Academy of Sciences

Article 1

1. The Anti-corruption policy of the Mossakowski Medical Research Institute, Polish Academy of Sciences (hereinafter: the *Policy*) defines the standards and rules of conduct to minimize the risk of corrupt activities that may occur in certain areas and processes carried out at the Mossakowski Medical Research Institute, Polish Academy of Sciences (hereinafter: the *Institute*).
2. This Policy should be treated consistently with the Work Regulations of the Institute.

Article 2

1. Whenever the Policy refers to corruption, it should be understood as offering, providing or accepting in any form, regardless of value, any benefit—both tangible and intangible—as well as an abuse of official position, power or influence in order to obtain unofficial and unjustified benefits for oneself or someone else, regardless of whether this behavior constitutes a criminal act under the provisions of law or a violation of ethics.
2. The Institute does not condone behavior that bears the hallmarks of corruption, fosters corruption or causes corruption. This principle applies to all the employees and associates of the Institute, regardless of their basis of employment, as well as suppliers and third-party service providers.

Article 3

1. The Institute operates on the basis of the highest standards of professional ethics and complies with the Polish and international law.
2. Transparent procedures of conduct are in place in the processes of hiring and promoting employees, granting degrees and titles, awarding public contracts, managing public funds, and in any other processes that are exposed to corrupt activities.
3. The Institute shall counteract corruption in particular by:

- a) creating a knowledge base on the website, accessible to all the Institute employees, containing educational materials on corruption;
 - b) a periodic analysis of corruption risks;
 - c) raising awareness of the Institute's employees about corruption, including, in particular, by regularly (at least twice a year) reminding the employees of issues relating to the anti-corruption policy, as well as reporting on actions taken in this regard;
 - d) responding to any behavior bearing the hallmarks of corruption;
 - e) obliging the Institute's employees to comply with this Policy;
 - f) taking other reasonable measures necessary to prevent corruption.
4. In justified cases, the Institute may file a report of a suspected offense with law enforcement agencies.

Article 4

1. Employees of the Institute, regardless of the legal basis of their employment, shall be obliged:
 - a) to comply with this Policy;
 - b) to familiarize themselves with the knowledge base, which includes educational materials on corruption, available to the employees on the Institute's website;
 - c) to carry out their duties in a manner that guarantees transparency and impartiality of actions towards all stakeholders;
 - d) not to offer or provide undue financial or personal benefits to any person associated with the Institute's activities;
 - e) not to accept any undue financial or personal benefit;
 - f) to avoid conflicts of interest, understood as a conflict between the work and duties performed at work and the private interests of the employee, and to inform their supervisor or the Institute's board of directors of the risk of such a conflict;
 - g) to support the Institute's efforts to prevent corruption at the Institute;
 - h) to report any action potentially in violation of this policy to their immediate supervisor or the Institute's board of directors.
2. Notwithstanding the obligations established in Clause 1, the Institute employees who are particularly exposed to the risk of corruption shall be obliged to participate in free electronic training on the Central Anti-Corruption Bureau platform available at <https://szkolenia-antykorupcyjne.edu.pl/> on anti-corruption and on Corruption in Public Administration, and to provide a certificate from the training to the Personnel Department. The following employees shall be considered to be at high risk of corruption:
 - a) Director of the Institute and their Deputy Directors;
 - b) Chief Accountant;
 - c) employees of the Section for Procurement and Investment Purchases;

- d) employees of the Procurement and Transportation Department, whose duties include the procurement of goods and services for the Institute;
 - e) the heads of the various organizational units of the Institute;
 - f) employees acting as managers of externally funded projects;
 - g) members of tender committees;
 - h) members of the Faculty Committee;
 - i) employees representing the Institute in recruitment proceedings for doctoral schools co-led by the Institute;
 - j) other employees designated by the Director of the Institute by official order if the analysis of the risk of corruption shows a high level of their exposure to corruption.
3. The employees referred to in Clause 2 who are employed at the Institute as of the effective date of this Policy shall be required to undergo training and send the certificate by May 31, 2020. Employees who start work during the term of this Policy shall be required to undergo training within 30 days of the conclusion of the employment contract, assumption of the position/function referred to in Clause 2, or notification by the Director of the obligation to undergo training.
4. Behavior that will be considered corruption shall constitute a violation of the basic labor obligations and may be the basis for the Institute, as an employer, to take the actions provided for in the labor laws, including, in particular, the application of a penalty, or in the case of a severe violation, termination of the employment contract with the employee, without notice.

Article 5

1. The Institute undertakes to continuously monitor compliance with the provisions of this Policy and other anti-corruption regulations.
2. In the event that, in order to counteract corruption, it becomes necessary to take further systemic measures not provided for in this Policy, the Institute undertakes to update this Policy.

DIRECTOR

[Signature]

*prof. dr hab. n. med. [PhD, DSc] Leonora
Bużańska*