



Code of Conduct

This Code of Conduct lays down each employee's responsibilities towards fostering a culture of professionalism, respect and ethical behaviour, as well as good governance. It provides greater insight into the spirit and the scope of the provisions applicable.

Purpose: Public Benefit through Innovation

As laid down in its statute, kENUP Foundation is committed to the promotion of research-based innovation, originating from Europe for Europe in particular, and for a global benefit in general. All employees at kENUP Foundation aim at bringing about change for societal and public benefit through innovation.

Professional acumen: Integrity

All employees at kENUP Foundation show the highest level of integrity and perform their work diligently in a good manner and to a high standard of professional competence. Employees always behave in an honest and trustworthy manner and treat others respectfully.

In carrying out their duties, employees will not violate any of laws related directly or indirectly to their line of work. Employees shall indemnify the Foundation against all liabilities, claims, costs, damages, expenses and losses incurred by or made against the Foundation arising directly or indirectly as a result of wilful default, misconduct or gross negligence of the Employee.

Non-discrimination Policy

kENUP Foundation is an equal opportunity employer. It does not discriminate on the basis of race, colour, religion, gender, gender expression, age, nationality, disability, marital status or sexual orientation, in any of its activities or operations. These activities include, but are not limited to, hiring and firing of staff, selection of volunteers and suppliers and provision of services. kENUP is committed to providing an inclusive and welcoming environment for all members of its staff, clients, and interns. Foundation employees treat each other respectfully and uphold an atmosphere of collegiality.

Confidentiality

Employees treat as strictly confidential any sensitive information concerning the Foundation, or any partner or client information to which they become privy as a result of their work.

Ban on Insider Trading

kENUP employees are aware of the confidential and often privileged nature of the information obtained while performing their work. In order to abide by all applicable laws and to protect the Foundation from loss of trust, no employee may buy, sell or otherwise trade in securities of a client while aware of material non-public information concerning the client. Furthermore, employees shall be prohibited from passing on material non-public information to friends, family members and other third parties.

Conflict of Interest

Employees are obligated to disclose ethical, legal, financial, or other conflicts of interest involving the Foundation and refrain from engaging in any activity which conflicts with their obligations towards the Foundation. They will advise the Foundation as soon as practicable of

any potential or existing conflict of interest and remove themselves from any decision-making position from the Foundation with respect to any situation where a conflict of interest might arise.

Gifts

Permission must be obtained from a kENUP Director before employees may accept from any source outside the foundation any honour, decoration, favour, gift or payment of any kind. Applying the standards of Officials of the European Commission¹, only gifts or presents worth less than EUR 50 may be accepted without a prior request for authorisation. When the value involved exceeds that limit, employees are advised to discourage outside parties from offering them gifts if they are connected with work performed in the line of duty.

Reporting of integrity concerns

Employees will bring to attention of a kENUP Director any situation they believe to be inappropriate behaviour of a colleague, a partner, a client or another third party. Responders treat such reports as confidential and will protect employees from retaliation. Should any concerns arise in regard to the conduct of a Director, the employee may inform another Director/ kENUP lawyer/ supervising authorities of the issue.

Compliance with code of conduct and Foundation policies

This Code of Conduct applies to employees of kENUP Foundation and employees of all other entities that are controlled by kENUP Foundation. Compliance with this policy is a necessary condition of the employee's work with the Foundation. Additionally, kENUP Foundation employees comply with any other Foundation policy that guides kENUP's purpose and day-to-day work. Non-compliance with applicable laws and this policy may result in disciplinary action, including termination of employment, and possible civil and criminal proceedings.

https://ec.europa.eu/info/sites/info/files/communication-to-the-commission-guidelines-on-gifts-and-hospitality_2012_en.pdf