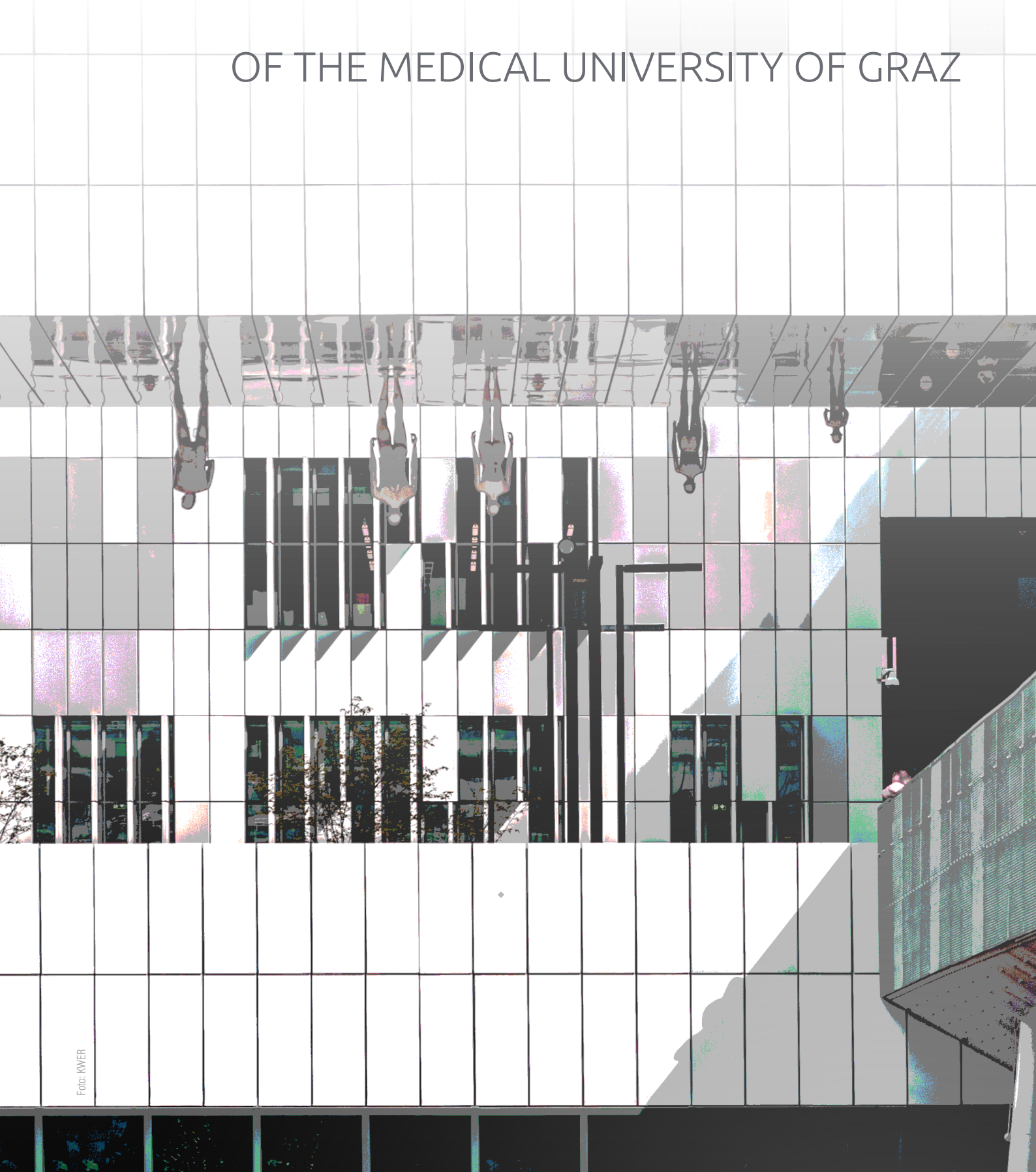


CODE OF CONDUCT

OF THE MEDICAL UNIVERSITY OF GRAZ



Foreword

Dear colleagues,
Dear reader,



As a public university, the Medical University of Graz is very aware of its responsibility to society and stands for excellent research, research-guided teaching and cutting-edge patient care.

Our actions are governed by openness, fairness, equal opportunity and scientific integrity. Each and every one of us is responsible for behaving ethically and professionally.

This Code of Conduct is a binding set of rules that describes the basic principles for conduct within the university and for dealing with students, external partners and the public. The Code of Conduct applies to all employees working at the Medical University of Graz.

The content was discussed and mutually agreed upon by the Senate and the interest representations of the Medical University of Graz.

We trust that each individual will act properly and appropriately in every situation. Failure to comply with the Code of Conduct damages the reputation of the Medical University of Graz and may also have legal consequences.

We request that you become familiar with the content of the Code of Conduct and keep it in mind in your day-to-day work.

The Rectorate leads by example, and we invite all employees to join us on this path and contribute to a working atmosphere characterized by trust, tolerance and fairness in their respective areas of responsibility.

On behalf of the Rectorate

Univ.-Prof. Dr. Hellmut Samonigg

Rector of the Medical University of Graz



Table of contents

I. General provisions	4
1. Introduction and objective	4
2. Scope and implementation	4
II. Guiding principles	5
1. Integrity and equal treatment	5
2. Research and teaching	5
3. Data protection and confidentiality	5
4. Business and cooperation partners.....	6
5. Conflicts of interest and secondary employment.....	6
6. Financial integrity.....	7
7. Use of resources	7
8. Health and safety.....	8
9. Anti-corruption	8
10. Handling of public communication and social media	9
11. Knowledge of misconduct.....	9
III. Final provisions	9
1. Consequences of non-compliance.....	9
2. Compliance organization	10
3. Entry into force	10



I. General provisions

1. Introduction and objective

This Code of Conduct describes the basic principles for conduct within the university and for dealing with students, external partners and the public. It guides and protects every individual.

The members of the governing bodies and all executive staff have a role model function (“tone from the top”); among other things, they must actively practice legally compliant conduct and ensure a working atmosphere characterized by trust, tolerance and fairness in their area of responsibility.

All employees working at the Medical University of Graz (Med Uni Graz) are required to comply with all legal provisions that apply to them (laws, statutes, university guidelines, etc.).

This Code of Conduct is a binding set of rules and does not replace any university-related legal provisions or internal guidelines. The Code of Conduct supplements other implementation provisions (especially the Compliance Policy).

Conduct at the workplace and in other work-related situations, such as on business trips, at congresses or social events with a professional and/or business background, has a direct impact on the reputation of Med Uni Graz. The conduct of employees should therefore be responsible, respectful and well-considered in every situation, including in social networks.

Since 2013, all employees of Med Uni Graz have been considered “public officials” within the meaning of Austrian criminal law on corruption and are themselves liable to prosecution in the event of violations of the strict criminal provisions on “official corruption” in relation to official activities within the framework of public and private sector administration.

2. Scope and implementation

This Code of Conduct applies to the members and substitute members of all governing bodies of the university as well as other bodies and committees, to all executive staff and all employees including lecturers of Med Uni Graz.

The Rectorate of Med Uni Graz has the ultimate responsibility for compliance with the Code of Conduct. The operational responsibility for the introduction and implementation within Med Uni Graz lies with the Compliance staff unit.

All employees, including the members of all governing bodies, are required to confirm in writing their acknowledgement of the Code of Conduct. The obligation to act in accordance with the principles of the Code of Conduct also applies without this declaration.

Executive staff has a special personal obligation to ensure that the Code of Conduct is implemented and complied within their area of responsibility. This also includes people who are functionally equivalent to internal employees, such as visiting scientists and researchers.



This Code of Conduct also applies mutatis mutandis to all employees of companies in which Med Uni Graz holds a direct stake of more than 50%.

II. Guiding principles

1. Integrity and equal treatment

The employees of Med Uni Graz are expected to treat each other, students and all other persons in their professional environment in a correct, appreciative and respectful manner and respect their personal integrity.

This respectful interaction also includes making sure that one's outward appearance is appropriate for their role.

Med Uni Graz does not tolerate improper preferential treatment, nor does it tolerate discrimination, threats, insults, bullying or harassment due to ethnicity, origin, nationality, culture, religion, belief, political or union activity, skin color, gender, sexual orientation, age or mental or physical constitution.

An appropriate personal distance must be maintained between superiors and employees, doctors and patients or teachers and students, especially in situations of authority and dependency.

2. Research and teaching

Neither scientific misconduct, nor fraud are tolerated at Med Uni Graz. To ensure scientific integrity, employees shall adhere to the recognized standards for good scientific practice and good clinical practice in research and teaching.

When carrying out third-party funded activities, executive staff and employees working in the field of science and research shall strictly adhere to all applicable guidelines (*Drittmittelrichtlinie* (Third-Party Funding Guideline), etc.) in their respective current versions.

The obtaining of habilitations, titles or other awards by fraudulent means is not tolerated at Med Uni Graz.

3. Data protection and confidentiality

Med Uni Graz and its employees shall follow the current data security standards and procedures and prevent unauthorized individuals from viewing, using, changing, stealing or destroying data and information of Med Uni Graz.

Med Uni Graz and its employees must handle all data and information (i.e., personal data, research data, student data, clinical data, financial data, human specimens, etc.) in compliance with the law and proceed with due diligence when collecting,



storing, using, transferring or deleting data and information.

University work involves the handling of confidential, privileged or sensitive data. Therefore, the employees of Med Uni Graz shall observe the applicable legal regulations when handling data and information during and after their employment at Med Uni Graz.

In addition, they shall handle all data and information, even if it is not explicitly marked as confidential, with particular care and sensitivity during and after the end of their employment at Med Uni Graz and pay particular attention to data protection when passing on information/data (both externally and internally).

Employees are prohibited from removing official documents, including electronic data and e-mails, from the sphere of the university without the official authorization or consent of Med Uni Graz. Upon termination of the employment relationship, all official documents, including electronic data and e-mails as well as copies, must be offered for handover to their respective superior.

Employees must ensure that trade secrets, the university's own knowledge (know-how), intellectual property rights and copyrighted works of Med Uni Graz as well as third-party intellectual property are not violated.

In governing bodies, committees and commissions, special importance shall be attached to data protection, and confidentiality must be maintained.

Employees are responsible for their login information to the university's IT systems. They must keep their passwords a secret and change them regularly.

The obligation to maintain confidentiality also applies to the time after the termination of the employment relationship or function.

4. Business and cooperation partners

As a public contracting authority, Med Uni Graz is subject to the applicable Federal Procurement Act. Award procedures and procurement processes shall be carried out transparently and in compliance with the law.

Med Uni Graz attaches particular importance to the careful and objective selection of its contractors and consultants and all other third parties acting on behalf of Med Uni Graz.

Med Uni Graz values and respects its business and cooperation partners and maintains trusting and fair business relationships.

5. Conflicts of interest and secondary employment

The employees of Med Uni Graz shall adhere to a strict separation of university and personal interests. Circumstances that could influence



impartiality or even give the appearance of bias must be avoided.

Conflicts of interest or loyalty arising from a close personal relationship between employees and representatives of business or cooperation partners, or other employees must be avoided. Political activities of employees at Med Uni Graz must not have any influence on their work at Med Uni Graz.

Secondary employment must not conflict with the interests of Med Uni Graz. Based on the applicable legal provisions and contractual agreements, employees must immediately report any gainful secondary employment in accordance with the guidelines or have it approved in advance in the cases provided for this purpose (see *Nebenbeschäftigungsrichtlinie* (Guideline on Secondary Employment) in the currently valid version).

6. Financial integrity

The employees of Med Uni Graz must perform their duties as part of the university's financial management in accordance with the principles of the rule of law, efficiency, expediency, frugality and transparency and use the university's financial resources responsibly and economically. Particular attention must be paid to avoiding and/or minimizing financial risk.

This applies in particular to executive staff with regard to cost responsibility for the unit assigned to them and to project leaders for dedicated and undedicated third-party funds.

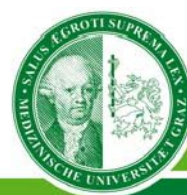
Budgeting, bookkeeping, accounting, and reporting, cash and receipt management must always be carried out in full and correctly and be documented in a clear and comprehensible manner.

In the case of correspondence, particularly with external effect, employees with signing authority must be aware of the responsibility and consequences of signing documents.

7. Handling of resources

Employees are expected to handle the available resources in a careful, proper, responsible and efficient manner. Employees should protect the property and assets of Med Uni Graz from loss, theft, damage or misuse.

Staff and material (equipment, premises, physical resources, etc.) and immaterial (intellectual property/IPR, licenses, etc.) property belonging to Med Uni Graz is generally not intended for private use or for activities that do not pertain to the purpose and responsibilities of the university. Exceptions to this are only possible if called for by specific regulations/agreements or permitted by Med Uni Graz. Med Uni Graz allows all employees and public servants the private use of the "medunigraz.at" e-mail address and Internet access. However, private use is restricted by Med Uni Graz within the meaning of the ICT Usage Ordinance of the Austrian Federal Government



(original version: Federal Law Gazette II Nr. 281/2009) as amended and must be observed by public servants and employees alike.

It is not permitted to use the IT systems (including cell phones, etc.) for activities that are harmful, unlawful or unethical, or in any other way not in accordance with this Code of Conduct.

8. Health and safety

Med Uni Graz is responsible for the health and safety of its employees in the workplace and takes every reasonable precaution required by law to ensure that the workplaces at Med Uni Graz enable safe working conditions.

Med Uni Graz shall create working conditions that motivate employees and make it possible to combine work, family and private life.

Employees are also responsible for complying with all applicable regulations and internal guidelines for the protection of health and occupational safety. All employees at Med Uni Graz are responsible for adhering to these guidelines.

All executive staff must instruct and support their employees in exercising this personal responsibility.

Any suspected health or safety hazard must be reported immediately to the employee's immediate superior, the safety expert or the responsible safety officer.

The consumption of alcohol as well as narcotic substances as defined in the current version of the Narcotic Substances Act—as long as the latter are not prescribed by a doctor—is not permitted during working hours, nor working under their influence. Moderate consumption of alcohol is permitted at official celebrations.

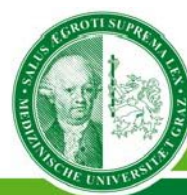
Employees should follow the Med Uni Graz smoking policy.

9. Anti-corruption

At Med Uni Graz, no form of bribery or other acts of corruption are tolerated, and employees are expected to avoid even the appearance of misconduct.

A moderate exchange of gifts and invitations can be a socially accepted part of successful business relationships. However, gifts and invitations carry the risk of unduly and improperly influencing an official act or business decision. The principles of appropriateness and transparency therefore apply when dealing with the acceptance of benefits.

The acceptance of reasonable travel and accommodation expenses as well as participation fees for exclusively work-related scientific or academic events or further training courses is permitted.



The acceptance and giving of cash or cash equivalents is only permitted to the extent permitted by law (details are regulated in the Compliance Policy).

Employees are obliged to inform their immediate superior or the Compliance staff unit if they are offered an undue personal benefit.

10. Handling of public communication and social media

The Rector represents Med Uni Graz externally. In the interests of consistent and transparent information, the Public Relations and Event Management staff unit assigned to the Rector must therefore always be involved in contacts and discussions with the media (including the Internet and social media) in advance.

Statements that will be issued to the public and can affect the interests of Med Uni Graz, and which will appear in traditional and social media, must be approved by the Rectorate. Such statements may only be made by employees authorized by the Rectorate.

Contributions or publications that are exclusively professional in nature and are made as part of academic activity do not need the prior approval of the Rectorate.

When using social media privately, employees should take steps to ensure that no confidential, official information is disclosed or that the reputation of Med Uni Graz is damaged through such disclosures.

11. Knowledge of misconduct

Employees with knowledge of breaches of official duties must inform their respective immediate superior, the Rectorate directly or the Compliance staff unit of such breaches. All information received in this regard will be treated confidentially.

In order to promote trusting communication, it is expressly stated that employees who report suspected misconduct solely in good faith shall not suffer any negative consequences of any kind, regardless of whether this suspicion is ultimately confirmed or not. This applies equally to other persons who contribute important information to the investigation of any misconduct.

III. Final provisions

1. Consequences of non-compliance

In the event of indications of illegal or irregular conduct, the Rectorate shall initiate an objective, transparent review of the suspicion and then take appropriate action.

Any proven violation of this Code of Conduct and the underlying legal provisions or other guidelines of Med Uni Graz may have consequences under employment or labor law. In such cases, the works council shall be involved within the scope of its statutory right to participate or represent the employee.



If legal violations result in damage, this may also result in personal liability on the part of employees.

2. Compliance organization

In the current Rules of Procedure of the Rectorate of Med Uni Graz, the area of responsibility for compliance is assigned to the Rector with the relevant staff unit.

The head of the Compliance staff unit is responsible for setting up and ensuring a compliance management system to promote legally compliant and ethical conduct at Med Uni Graz in accordance with the Rector's guidelines.

In this role, the staff unit informs and advises the Rectorate on the one hand and, on behalf of the Rectorate, the executive staff and employees on issues relating to this Code of Conduct and the Compliance Policy on the other.

3. Entry into force

This Code of Conduct is considered as a guideline of the Rectorate pursuant to section 22 (1) of the Universities Act 2002 as amended and takes effect on the day it is published in the university gazette.