

Compliance

**CODE OF CONDUCT
HELMHOLTZ MUNICH
DEUTSCHES FORSCHUNGSZENTRUM FÜR GESUNDHEIT UND
UMWELT (GMBH)**

- in the following "*Helmholtz Munich*" -

Version May 29, 2026

TABLE OF CONTENTS

I.	PREAMBLE	- 3 -
II.	CODE OF CONDUCT	- 4 -
1.	COMPLIANCE WITH LAWS AND STANDARDS	- 4 -
2.	ENSURING GOOD SCIENTIFIC PRACTICE	- 4 -
3.	PREVENTION OF DISCRIMINATION	- 4 -
4.	SAFE AND FAIR WORKING CONDITIONS	- 5 -
5.	COOPERATION WITH EMPLOYEE REPRESENTATIVES	- 6 -
6.	ETHICS AND SUSTAINABILITY	- 6 -
7.	ENVIRONMENTAL AND ANIMAL PROTECTION	- 7 -
8.	CORRUPTION PREVENTION	- 7 -
9.	SAFEGUARDING FREE AND FAIR COMPETITION	- 8 -
10.	AVOIDANCE OF CONFLICTS OF INTEREST	- 8 -
11.	DATA PROTECTION AND INFORMATION SECURITY	- 8 -
12.	EXPORT CONTROL	- 9 -
13.	CONFIDENTIALITY AND PROTECTION OF BUSINESS ASSETS	- 9 -
14.	HANDLING WITH MEDIA	- 10 -
15.	CONFLICTS IN DAILY WORK	- 10 -
16.	REPORTING OF COMPLIANCE-RELEVANT (SUSPECTED) CASES	- 10 -
III.	CONTACT PERSONS AND CONTACTS	- 11 -

I. PREAMBLE

For over 60 years, Helmholtz Munich has stood for excellent and innovative research—particularly regarding medical solutions for environmentally induced common diseases—aimed at fostering a healthier society in an ever-changing world. Our research center’s success story is defined by both continuity and constant evolution, as well as by the assumption of national and international responsibility in the fields of prevention, diagnosis, and therapy, and the dissemination of scientific findings in these areas of medical research.

This Code of Conduct supersedes all previous versions. It is binding upon the Executive Board, management, visiting scientists, and employees of Helmholtz Munich—including trainees—in their interactions with one another, as well as with existing or potential business and cooperation partners, competitors, public authorities, the media, and any other persons or entities with whom Helmholtz Munich is or may come into contact. The purpose of this Code of Conduct is to set out the general principles for legally and ethically impeccable behaviour at Helmholtz Munich. It is the responsibility of each individual to observe these principles and to apply them consistently in their work for Helmholtz Munich. The management and executives have a special role model function in this regard. They are required to set a good example - both through their own conduct and through their statements - and to ensure compliance with this Code of Conduct in their respective areas of responsibility through appropriate supervisory and organizational measures. This Code of Conduct forms the basis of our corporate, management and error culture. With this Code of Conduct, we want to enable excellent research while maintaining ethics, transparency and compliance with rules.

II. CODE OF CONDUCT

1. COMPLIANCE WITH LAWS AND STANDARDS

The basis of all our actions at Helmholtz Munich is compliance with statutory regulations, other legal provisions and standards such as funding regulations and self-imposed obligations. Applicable laws that must be posted and company regulations (company agreements) are therefore made easily accessible to all employees. The tasks of management and executives include actively informing employees, clarifying and questioning issues. Everyone must inform themselves about the regulations applicable in their area of responsibility at the research center, comply with them and, in cases of doubt, obtain information and advice from their supervisor, the management and the responsible external entities.

2. ENSURING GOOD SCIENTIFIC PRACTICE

Scientific work is based on the principles of scientific honesty, conscientiousness, integrity and open discourse, which apply in all scientific disciplines and internationally. The constitutionally guaranteed freedom of science is also associated with a corresponding personal responsibility. Good scientific practice is a prerequisite for efficient and internationally recognized scientific work.

Helmholtz Munich is committed to upholding good scientific practice. To this end, we have implemented ombudspersons and a commission. Details are regulated by the Guideline for Safeguarding Good Scientific Practice, which Helmholtz Munich issued in accordance with the Code of Conduct “Guidelines for Safeguarding Good Scientific Practice” of the German Research Foundation (Deutsche Forschungsgemeinschaft e.V.) in September 2019.

3. PREVENTION OF DISCRIMINATION

We expect everyone to treat each other and our cooperation and business partners as well as third parties in an objective, friendly and respectful manner.

We expressly wish diversity. Helmholtz Munich does not tolerate discrimination - whether psychological, physical, sexual or verbal - based on gender, age, religion, ethnic origin, culture, religious beliefs, disability/chronic illness or sexual identity, nor does it tolerate any form of harassment or personal attacks. Contact persons

are listed under the First Contact Points. Everyone is obliged to respect the personal sphere of others, considering the aforementioned criteria. The various guidelines, such as the guideline against discrimination, bullying and sexual harassment, and associated documents regulate the details of this.

4. SAFE AND FAIR WORKING CONDITIONS

Helmholtz Munich guarantees safe and fair working conditions for employees and managers. This also includes equal opportunities. We want to ensure the physical and mental integrity of each individual. It goes without saying that the applicable work, accident prevention and health regulations are complied with in order to avoid accidents, injuries and work-related illnesses.

We support our employees not least with the help of flexible working time models, e.g. the option of mobile working, in order to facilitate the compatibility of family and career, as well as to contribute to an appropriate work-life balance and thus to the satisfaction of our employees. The personal and professional development of our employees as performers and knowledge carriers is particularly important to our research center, as is the active promotion of young talents. As a recognized training institution, we also attach great importance to providing people with vocational training. We see qualification measures for our employees at all levels as an investment in the future. Details can be found in the regulations on talent management, among other things.

We offer scientists in the qualification phase predictable career paths. Given the number of fixed-term employment contracts inherent in science, managers in particular must ensure that doctorates are completed and qualification goals are achieved. Against this sensitive background, managers are required to take all possible measures to prevent abuse of power.

In addition, we want to dovetail science and administration more closely through a management culture based on this code of conduct. We therefore support all measures that contribute to this.

5. COOPERATION WITH EMPLOYEE REPRESENTATIVES

The management and executives maintain an open and trusting working relationship with the Works Council, a constructive dialog and a fair reconciliation of interests.

The works council's participation rights are respected.

6. ETHICS AND SUSTAINABILITY

We respect human rights and avoid violating them. This is also expressed in our policy statement on human rights strategy. With our focus on health research and the aim of translating our results into the reality of medicine and health promotion, compliance with medical ethical standards, such as those laid down in the World Medical Association's Declaration of Helsinki and in pharmaceutical and medical device laws, is a matter of course. For studies with human samples or data, we obtain the positive vote of an ethics committee. It is also essential to comply with European data protection regulations. Together, we develop and maintain the competence to conduct ethically responsible research and action for human health. As required by the guideline "Sustainability of the Helmholtz Association of German Research Centers", we keep an eye on the consequences for society and the benefits for the common good in the strategy and implementation of our research.

Sustainability, particularly in the sense of sustainable protection of people, animals and the environment, and the use of our resources for the long-term benefit of our society are central elements of our philosophy. The basis for sustainable development is the guideline "Sustainability of the Helmholtz Association of German Research Centres" with its five fields of action: organizational management, socially competent impact of the research process, attractive working environments, resource-efficient research infrastructures and responsibly designed supporting processes.

- https://www.helmholtz-munich.de/fileadmin/user_upload/About_Us/Leitlinie_Nachhaltigkeit_der_Helmholtzgemeinschaft.pdf
(Leitlinie Nachhaltigkeit der Helmholtzgemeinschaft)
- <https://www.helmholtz-munich.de/ueber-uns/nachhaltigkeit-bei-helmholtz-munich>

7. ENVIRONMENTAL AND ANIMAL PROTECTION

As a research centre, we are particularly committed to environmental and animal protection. We regard comprehensive compliance with the applicable standards of environmental and animal protection law as a matter of course. We attach great importance to realising sustainable action in the awareness of environmental and animal protection not only through the responsible actions of each individual in all functions and at all levels of our centre, but also by setting concrete goals in cooperation with those with responsibility and through structural decisions by managers that are geared towards sustainability, environmental and animal protection.

With the help of our internal managers, we ensure that environmental protection is implemented through specific targets and rules of conduct. In addition, we continuously promote the knowledge and awareness of our managers and employees in the areas of environmental and animal protection.

To achieve our research goals, animal experiments have been indispensable up to now. Through prudent experimental planning, implementation and evaluation, we generate reliable results from animal studies as an elementary component of research for a healthier society. Managers and employees have a duty of care: Everyone is obliged to fulfil the legal requirements and ethical principles when dealing with laboratory animals and to always treat the animals with respect.

8. CORRUPTION PREVENTION

We are convinced of the quality of our work and the performance of our managers and employees. We firmly reject any form of bribery and corruption or even attempts to do so. We attach great importance to working only with reputable business and cooperation partners from research and industry whose (business)behaviour is legally impeccable.

Therefore, it is prohibited to offer or accept monetary payments, valuable gifts or other valuable benefits from clients, business and cooperation partners or other third parties when initiating, awarding or executing a contract. As an exception, gratuities are only permitted if there is not even the mere appearance of an intended or actual influence on decision-making processes, for example if they are in line with politeness, socially customary and generally accepted. Details can be found in the regulations on avoiding the risk of corruption and the anti-corruption guideline for managers.

9. SAFEGUARDING FREE AND FAIR COMPETITION

For Helmholtz Munich, adherence to the rules of free and fair competition is just as much a matter of course as compliance with the related provisions of public procurement, antitrust and competition law.

Agreements that restrict competition, in particular on prices, terms and conditions, market sharing or non-competition, harm both free competition and our research centre and are prohibited. This includes not only written agreements, but also informal discussions, informal arrangements and “Gentlemen's Agreements” that have the aim or consequence of restricting competition.

10. AVOIDANCE OF CONFLICTS OF INTEREST

Conflicts of interest are detrimental to Helmholtz Munich and are to be avoided as a matter of principle.

Taking up employment outside Helmholtz Munich, i.e. with other research institutions, competitors or contractors of Helmholtz Munich, is only permitted with the prior written authorisation of the management, unless special regulations apply.

Favouring of partnerships in research and industry for personal interests, in particular the favouring of family members, is prohibited. Even the mere appearance of favouritism based on personal interests must be strictly avoided.

Any person employed by Helmholtz Munich who identifies a conflict of interest must immediately report it to their direct supervisor, the Compliance Officer, or via the anonymous whistleblower system and—to the extent possible—cooperate in reaching a mutually agreed-upon resolution to the conflict of interest; see also Section II.16 below.

11. DATA PROTECTION AND INFORMATION SECURITY

Protecting personal data and other sensitive information requiring protection is one of our fundamental principles. Helmholtz Munich collects, processes, and uses data concerning individuals working with or for us, business and cooperation partners from the research and business sectors, and other third parties solely in accordance with applicable regulations and contractual agreements. Personal data are collected, processed, or used—based on consent or a legal authorization—only for specified, explicit, and legitimate purposes, and

are stored or transmitted securely. The use of such data is always transparent to the data subjects, while upholding their rights, such as the right to access, object, restrict processing, delete, or rectify data.

Detailed information on security rules for handling IT equipment and internet use can be found in our internal regulations and informational materials.

12. EXPORT CONTROL

The cross-border movement of goods (goods, technologies and software) is subject to prohibitions, restrictions, authorisation requirements or other monitoring measures as part of export controls. This also includes economic sanctions and regulations to combat terrorism.

As an internationally cooperating research centre, we are aware of our responsibility to comply with national and international foreign trade laws, regulations and embargoes and are expressly committed to the objectives of export control.

Our health research and development – while respecting the constitutionally guaranteed freedom of science – is geared towards peaceful purposes. This includes collaboration with non-civilian business and cooperation partners and the availability of potential ('dual-use'), or concrete military end uses on a case-by-case basis. We attach great importance to compliance with all regulations for the - physical, electronic and verbal - export of goods, services and information and to careful examination of the relevant sanctions lists. We all contribute to compliance with the laws, regulations and internal rules in this area.

13. CONFIDENTIALITY AND PROTECTION OF BUSINESS ASSETS

The success of our research centre depends to a large extent on our innovative strength and the knowledge we have acquired over several decades. Business secrets, confidential information and research and business documents must be properly stored and protected accordingly. Everyone must ensure that Helmholtz Munich's partners from research and industry do not become known outside Helmholtz Munich without authorisation. Business secrets may neither be disclosed without authorisation nor used for personal purposes. Details are regulated by the IP guideline, among others.

We expect everyone to handle Helmholtz Munich's assets responsibly and to make decisions based on scientifically and commercially verifiable reviews and analyses.

14. HANDLING WITH MEDIA

Transparent and consistent public information strengthens our image. Official statements to the leading and general media are the responsibility of the management, authorised managers and employees. Our managers and employees must always inform the head of the department responsible for these media enquiries immediately in the event of enquiries from the leading or public media.

15. CONFLICTS IN DAILY WORK

We foster a culture in which mistakes and challenges can be addressed openly. For questions, feedback, or personal conflicts arising in the course of daily work, your direct supervisor is the first point of contact. Furthermore, additional internal resources are available to assist in such matters. Information regarding these resources can be found on the Helmholtz Munich intranet.

16. REPORTING OF COMPLIANCE-RELEVANT (SUSPECTED) CASES

We can only achieve our goals if we all stand together for ethical and lawful conduct (= conduct in compliance with regulations—see also Section II.1. above). We therefore encourage everyone to immediately report any observed or suspected compliance-related violations of legal regulations (e.g., corruption, fraud, discrimination), other legal provisions and standards such as grant law provisions, as well as self-imposed obligations. The same applies if someone is personally asked to violate this Code of Conduct. We recommend contacting our reporting office—either openly or anonymously—via the electronic whistleblower system in the event of such incidents and violations. It is the qualified and primary point of contact for this purpose. Why the reporting office? Here, specially trained experts review reports confidentially, objectively, and independently. This ensures the best possible investigation and the best possible protection for the whistleblower. Further details can be found on the Helmholtz Munich intranet and on our website.

Each single report is carefully reviewed, treated confidentially, and appropriate measures are taken. If the whistleblower has reasonable grounds to believe that the reported facts are accurate, they have nothing to fear—regardless of whether the suspicion is ultimately confirmed or not. In particular, we will not tolerate any discrimination against them or any fear of retaliation. Should this occur, we will take decisive action against it and, if necessary, impose appropriate sanctions.

Role of managers and senior management

Should employees nevertheless choose to approach their supervisor or the Management Board with a compliance-related tip (see Section II. 16, Paragraph 1 above), the recipient shall ensure that the matter is forwarded confidentially to the internal reporting office or the Compliance Officer for further processing and review. In this instance as well, we guarantee the reporting individual protection against retaliation. To facilitate a swift resolution, we recommend utilizing the electronic whistleblower system directly.

III. CONTACT PERSONS AND CONTACTS

Authorised representatives and information on training courses can be found in our internal communication system.

It is inherent in the matter that this Code of Conduct cannot cover all conceivable individual cases that we encounter on a day-to-day basis. It therefore goes without saying that the Code of Conduct must be updated regularly. Equally, there will be questions about this Code of Conduct or uncertainties when dealing with a specific situation. If this is the case or if you have any suggestions for improving this Code of Conduct, your line manager and our Compliance Officer will be happy to help.

Our current Compliance Officer is:
Dr. Nikolaus Ukert
Phone: 089/ 3187 43467
Nikolaus.Ukert@Helmholtz-Munich.de

The current contact information for the Compliance Officer can also be found on the Helmholtz Munich Intranet.

Neuherberg, 29.05.2026

signed

Prof. Dr. Dr. h.c. mult. Martin Hrabě de Angelis
Member and Spokesperson of the Executive Board
(acting)

signed

Dr. Michael Frieser
Administrative Director