



CENIEH

CODE OF ETHICS OF THE CENTRO NACIONAL DE INVESTIGACIÓN SOBRE LA EVOLUCIÓN HUMANA

PREAMBLE

This Code is another step toward the commitment to professional integrity which is expected to govern their daily management and work by all members of the Centro Nacional de Investigación sobre la Evolución Humana (CENIEH).

The Code is not intended to cover every single possible situation, but rather to set out the behaviors that are expected and desired from all who of us at the CENIEH in our professional activity. The Code also addresses the obligations of prevention imposed upon legal persons with regard to criminal liability.

The Code takes into account the main directives and principles on transparency, social responsibility, and good governance, and sets up a framework for the daily activity of all the persons who work at the CENIEH and in their interactions with collaborators, users of the facilities and services, clients, providers, other public authorities, and society in general.

The CENIEH is a Unique Scientific and Technological Infrastructure (ICTS), open to use by the scientific and technological community, which conducts research in the field of human evolution during the Late Neogene and Quaternary, promoting awareness and transfer of knowledge to society, while boosting and supporting work and collaboration in excavations of sites from those same periods, both in Spain and in other countries. In addition, the CENIEH is responsible for the conservation, restoration, management, and registration of the paleontological and archaeological collections from the excavations at Atapuerca, and other sites of similar characteristics, both national and international, which have entered into agreements with the Center.

The mission of the CENIEH is to manage and promote scientific, financial, technical and administrative collaboration between the authorities it is comprised of, for the equipping and operation of the CENIEH. It is governed by Statutes (set out in the form of consolidated text as an annex to the Resolution of August 6th 2018 by the Secretaría General de Coordinación de Política Científica (BOE no. 244 of October 9th 2018), and the Resolution of October 18th 2018 by the Dirección General de Universidades e Investigación (BOCyL no. 209 of October 29th 2018).

Fulfillment of this mission also depends on our behaviors as public sector staff and, above all, as ethical and responsible professionals. CENIEH staff have a series of responsibilities and obligations, not only to the authorities, but also to society and the citizenry, so that they shall at



all times ensure that this Code is fulfilled, and they are obliged to be aware of and comply with its principles, values, and rules of conduct.

1. SCOPE AND SPHERE OF APPLICATION.

- a) This Code is applicable, with no exceptions, to all persons who conform the CENIEH, without regard to their hierarchical position or duties or mode of employment, as well as to all facilities in whose management the CENIEH bears responsibility.
- b) All CENIEH staff, in their responsibilities and their duties, must harmonize their actions and behavior to the principles of this Center.

2. PRINCIPLES AND ETHICAL VALUES.

The CENIEH is committed to performing its activity and achieving its ends while upholding the highest ethical standards, and imposes on all a demand for ethical behavior and commitment to the following values, which must govern the conduct of all those this Code is directed to:

- a) Respect for the Constitution and the rest of the legal order, respect for the fundamental rights and civil liberties acknowledged in the same.
- b) Upright, diligent, and responsible conduct, endeavoring to pursue professional excellence, performing the duties assigned with honesty, placing the interests of the CENIEH before any personal or third-party interest, and behaving with due diligence and responsibility.
- c) Objectivity, independence, impartiality, and the prohibition upon arbitrariness, which includes the duty to abstain in those matters where there is a conflict of interest, must be the lodestar for all to whom this Code is directed. who must act at all times with complete objectivity and independence, and abstain in all those matters where a personal or third-party interest is at stake, or any private or public activity that could entail a conflict of interest with their duties at the CENIEH, and not accept any favor or situation implying an unjustified privilege or advantage from natural persons or private entities.
- d) Loyalty and the spirit of service imply placing the interests of the CENIEH above all other considerations, acting with due fidelity toward superiors and colleagues, acting in a spirit of collaboration, and placing all knowledge and resources that could facilitate the objectives and interests of the Center at the disposal of its other departments and persons.
- e) Efficiency and thriftiness mean making rational and efficient use of public resources, and



this is manifested in the reasonable use of expenditure and surveilling the assignment of the resources necessary, to ensure they are used in pursuit of the Center's objectives.

- f) Confidentiality demands that all information gathered in the course of duties at the CENIEH shall be processed with the due respect for the regulations on data protection and professional secrecy, in accordance with the measures imposed to avert and minimize the risks posed to that information. This means that all persons with access to that information must maintain and apply the confidentiality criteria necessary, and must not use information for their own benefit or that of third parties.
- g) Environmental protection demands that all the actions of the CENIEH should be respectful toward the environment, and adopting as part of each action measures directed at protecting it, through the rational use of resources, minimizing environmental impact, or demanding the appropriate remedial measures.

3. GENERAL GUIDELINES.

The principles and values set out above lead to the rules of conduct which shall govern the behavior of all members of the CENIEH.

One. RESPECT FOR CONSTITUTION AND THE REST OF THE LEGAL ORDER.

- a) All the persons bound by this Code undertake to comply with the Constitution and the rest of the legal order, the internal procedures of the CENIEH, the binding conventions and agreements, and the values and principles set forth herein.
- b) All the persons so obliged must be familiar with the regulations affecting their work, and shall request any clarification or precise information from their superior, if necessary. They similarly undertake to report any infringement of the law or of this Code they may detect using the whistleblower channel, a guide to the use and management of which is available to all such people, and to any other natural or legal person.
- c) The CENIEH must make available the means necessary so that all persons bound hereby shall be familiar with the appropriate regulations for the proper discharge of their duties.

Two. RESPECT FOR HUMAN RIGHTS AND CIVIL LIBERTIES, THE RIGHTS OF WORKERS; PROHIBITION UPON DISCRIMINATION AND HARASSMENT, AND PURSUIT OF THE WORK-LIFE BALANCE.

- a) The CENIEH undertakes to respect and protect the human rights and civil liberties recognized in the Universal Declaration of Human Rights and the main international agreements on the matter. The Center shall conduct its professional activities with respect for and guaranteeing the rights and freedoms of workers and collaborators.



- b) The CENIEH is committed to occupational health and safety for its staff, all of whom undertake to abide by the relevant regulations and to protect their own health and safety and those of the other persons who work at the CENIEH.
- c) The CENIEH guarantees non-discrimination on the grounds of sex, sexual orientation, marital status, age, race, nationality, religion, political or union affiliation, any other ideological opinion, or any other personal or social circumstance protected by the Constitution and the international treaties referred to above. All those to whom this Code is directed are obliged to treat all persons fairly and with respect, without any type of discrimination, either in language or in communications and attitudes, founded upon any of the grounds stated above.
- d) The CENIEH declares its commitment to maintaining positive work atmospheres, to preventing harassing behavior, and to pursuing and resolving any case of work harassment that could arise. For this reason, all CENIEH managers and workers are obliged to nurture a working atmosphere that fosters motivation, and it is prohibited to engage in any practice constituting abuse, harassment, discrimination, or lack of respect and consideration for others.
- e) The CENIEH prohibits and pursues all harassing conduct, including sexual harassment. The recipients of this Code of Ethics must be familiar with and apply the Equality Plan and the Protocol on managing conflicts and the prevention of bullying and violence at work.
- f) All recipients of this Code undertake to report any discriminatory conducts of any type using the whistleblower channel facilitated for the purpose upon detection.
- g) The CENIEH guarantees equality of professional opportunities, and promotes, to the extent of its possibilities, the professional and personal development of all its staff, and recognizes that the management and retention of knowledge is a key asset. Promotion decisions may only be based on objective parameters such as training, merit, effort, qualification, and the needs of the post to be filled.
- h) Pursuant to the Universal Declaration of Human Rights, the CENIEH explicitly condemns and prohibits any kind of work or service performed by a person under duress, punishment, under inhumane conditions, or performed by any person below the legal age.
- i) The CENIEH maintains a special interest in controlling and monitoring compliance with human rights with regard to its staff, such as the right of association (freedom of union membership and the right to collective negotiation), or the right to equitable and satisfactory employment conditions, and the work-life balance.
- j) The CENIEH assumes the commitment to facilitate reconciliation of the personal, family,



and professional lives of its people, so that the Center will promote actions to permit workers to reconcile their family and labor lives in the best possible conditions.

Three. DUTY OF OBJECTIVITY, INDEPENDENCE, IMPARTIALITY, AND PROHIBITION UPON ARBITRARINESS.

- a) The CENIEH and all its staff shall respect the principle of impartiality, so that they shall maintain independent judgment and at arm's length from any individual interest, with full respect for the regulations on activities and interests that are incompatible with their duties, while abstaining from intervention in any matter when their objectivity could be affected for any reason.
- b) The circumstances that could constitute a conflict of interest must be reported promptly, either directly by those affected to their immediate superiors, or else by other workers using the channel provided.

Four. REJECTION OF BRIBERY AND CORRUPT OR FRAUDULENT PRACTICES.

- a) The CENIEH declares its firm and stringent rejection of any form of corruption, bribery, or conduct that is fraudulent, and it proclaims its opposition to the exercise of any class of influence over the willingness of third parties, to obtain any class of benefit or advantage through the use of practices that contravene the law or the principles and rules of conduct set out in the Code of Ethics.
- b) The recipients of this Code may not offer or concede, either directly or indirectly, nor request or accept, payments, advantages, promises, or benefits of any class for themselves or for any third party, whether this is to perform or facilitate any licit or illicit conduct, or to refrain from either of these types of conduct.
- c) There exists a specific ethical duty to report any situation that might constitute bribery, corrupt behavior, or influence peddling, using the channel facilitated for the purpose.

Five. GIFT POLICY.

The recipients of this Code of Ethics shall only accept gifts or other courtesies offered because of the post or position they occupy at the CENIEH when they are of little value or merely symbolic. This category includes advertising and promotional gifts. These gifts shall be delivered or received transparently and on an occasional basis, by virtue of a generally accepted social practice or courtesy.

Six. DUTY OF LOYALTY TO THE CENIEH, COOPERATION WITH SUPERIORS AND COLLEAGUES, AND DEDICATION TO SERVICE.



- a) All staff must act with loyalty in relation to the CENIEH, completing their duties or the tasks assigned to them diligently, and obeying the orders and instructions of their superiors, unless these entail a clear infringement of the legal order, in which case the facts must be reported to the appropriate supervisory bodies.
- b) In all their professional actions, CENIEH members and staff shall safeguard the image and good name of the Center.
- c) Relations with the media in representation of the CENIEH are the exclusive competence of the persons designated for that purpose.
- d) The CENIEH propitiates an atmosphere of cooperation and teamwork to make the best use of all capacities and resources.
- e) All staff shall act in a spirit of cooperation with their colleagues, placing the knowledge and resources that could facilitate attaining the objectives and interests of the CENIEH at the disposal of the other departments and persons of the Center.
- f) Those who work at the CENIEH must complete their working hours and work efficiently to make the most of the time and resources the Center makes available to them, and endeavoring to maximize the value of all the processes in which they participate.
- g) Performance of their jobs by CENIEH staff shall be incompatible with any post, profession, or activity, either public or private, that could impede or hamper rigorous discharge of their duties or compromise their impartiality or independence. Nor may staff members combine their activities with the performance, either directly or through a substitute, of a second job, post or activity in the public sector, except in the circumstances provided for in the Act 53/1984, of December 26th, on Incompatibility for Employees at the Service of the Public Authorities. The exercise of professional, employment, commercial or industrial activities outside the CENIEH shall require a prior recognition of compatibility.

Seven. PROPER USE OF PUBLIC RESOURCES.

- a) The CENIEH is committed to managing the resources assigned to criteria of the utmost efficiency and thriftiness to maximize the value for society.
- b) The persons working at the CENIEH are responsible for the efficient use and care of the instruments, funds, and resources assigned to them, and shall refrain from any use that is improper or contrary to the general interest. Similarly, the resources made available to workers must be used solely for performing their duties, ensuring that they are used responsibly.

Eight. CLARITY AND EXACTNESS OF ACCOUNTING RECORDS. PREVENTION OF MONEY LAUNDERING



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AND FINANCING OF TERRORISM.

Persons working at the CENIEH shall ensure that all the operations of a financial nature they perform in the name of the CENIEH shall be clearly and exactly recorded in appropriate accounting records that represent a true and fair picture of the transactions accomplished, and that these are available to the internal and external auditors.

Nine. USE OF IT AND COMMUNICATION SYSTEMS.

The CENIEH promotes the proper use of both the IT equipment and programs and any files or electronic documents made available to the workers. CENIEH staff shall use this equipment and programs pursuant to the internal regulations developed for the purpose, as well as the information security measures in place, all pursuant to the National Security Scheme (ENS), and must at all times procure proper and appropriate use of the resources made available (email, Internet access, telephone, corporate telephone).



Ten. DUTY OF INFORMATION AND COMMITMENT TO TRANSPARENCY.

- a) The CENIEH shall report the actions it engages in truthfully and meaningfully. Information transparency is a basic principle governing the actions of the CENIEH.
- b) Whenever it does not refer to matters that are classified or confidential, the CENIEH shall make information requested available to the public in accordance with the Act 19/2013, of December 9th, on transparency, access to public information, and good governance.

Eleven. DUTY OF CONFIDENTIALITY AND SECRECY.

- a) All those to whom this Code is directed undertake the commitment not to disclose, and to protect, the confidential information they become aware of, whether this is personal data or a question of professional secrecy.
- b) Recipients of this Code of Ethics shall never use information they gain as a consequence of their relations with the CENIEH to obtain any personal financial advantage, nor shall they facilitate it to third parties to obtain the same kind of advantage.
- c) It is likewise prohibited to make duplicates of this information or reproduce it in any way, or store it in information systems not provided by the CENIEH, or which do not comply with the security measures of the Center.
- d) Those bound by this Code must comply with the obligation of secrecy even after their relationship with the CENIEH has ended.
- e) Recipients of this Code of Ethics who are responsible for handling or archiving data of a personal nature protected by law are obliged to be familiar with the legislation applicable and to ensure that it is duly applied and fulfilled. Personal data shall be processed in an especially restrictive manner as follows:
 - Only data that are necessary shall be collected.
 - Capture, processing, and use shall be accomplished in such a way as to ensure the security, truthfulness, and accuracy of the information, the right to personal privacy, and compliance with the obligations imposed by the regulations applicable.
 - Only persons duly authorized shall have access to those data, and only to the extent that this is necessary for their duties.

Twelve. RESPECT FOR THIRD-PARTY INTELLECTUAL AND INDUSTRIAL PROPERTY RIGHTS.

- a) All persons making up the CENIEH undertake not to reproduce, plagiarize, distribute, or communicate publicly, any artistic or scientific work on any media, without authorization



from the holders of the corresponding intellectual property rights.

- b) Similarly, the persons comprising the CENIEH undertake not to make copies of registered industrial designs and/or marks, and shall respect the industrial and intellectual property rights of third parties at all times.

Thirteen. RESPECT FOR THE ENVIRONMENT

- a) The CENIEH is committed to protecting the environment, and especially with regard to the elimination and recycling of waste, handling hazardous materials, and preventing discharges and filtration.
- b) The persons who are the recipients of this Code must ensure that this is complied with, and they must notify their superiors or those responsible for environmental management of all risks or infringements of the procedures provided.

4. WHISTLEBLOWER CHANNEL.

- a) The CENIEH provides its staff, collaborators, providers and other stakeholders with a whistleblower channel furnished by the Servicio Nacional de Coordinación Antifraude for formulating queries and reports about conducts that are possibly corrupt, fraudulent or could constitute conflicts of interest, or other irregularities or noncompliance with the controls established to minimize the risk of fraud, corruption or conflict of interest pursuant to the Code of Ethics and the other regulations applicable.
- b) The CENIEH has compiled a Guide to using and managing the whistleblower channel, which it will publicize together with this Code of Ethics for the awareness of its workforce and collaborators.
- c) Complaints reported to this channel must always be made in good faith, founded upon objective grounds and evidence demonstrating noncompliance.
- d) The CENIEH shall ensure that no type of reprisal shall be carried out, without regard to the origin or substance of the complaint. Nevertheless, any complaints made in bad faith, which are known to be false or have the sole purpose of undermining a colleague, subordinate, or superior, shall be subject to disciplinary sanction.

5. ACCEPTANCE AND COMPLIANCE.

- a) The CENIEH shall communicate and publicize this Code of Ethics among workers, as well as new staff who are hired or who come to form part of the Center. It shall likewise publicize and facilitate access to the same for providers and collaborators. The CENIEH



expects a strong level of commitment to compliance with its Code of Ethics from all its staff and collaborators.

- b) Persons working at the CENIEH who infringe the code may be the subject of disciplinary measures that shall bear due proportion to the degree of noncompliance. The disciplinary regime shall be governed by the regulations in force and the Center's own collective agreement. Nobody, without regard to their level or position, is authorized to request of a worker that they contravene the provisions of this Code. No employee may justify any improper conduct on the grounds that it was an order from a superior or that they were unaware of the Code.

6. VALIDITY.

This Code of Ethics shall enter into force once it is approved by the Governing Council, and it shall remain in force until such time as any modification or annulment is approved.

Date of approval: 27/07/2022
Governing Council