

External Code of Conduct of the Fraunhofer-Gesellschaft

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Foreword

Dear Clients and Partners,

The Fraunhofer-Gesellschaft strives to be an essential partner for industry and a driver of groundbreaking technological innovation. We aim to honor this commitment to innovation and excellence not only in our research but also in our organizational culture. Our goal is to establish a culture of mutual respect and ethical conduct, both internally and externally.

Central to this effort are trust, collaboration and personal growth. This External Code of Conduct was developed to achieve this goal, to strengthen the *Fraunhofer spirit* and to deepen the trust our customers and partners place in us. It also reflects evolving legal requirements at the national and international level. This code sets out the principles intended to guide our collaboration with clients and partners in a spirit of mutual respect and ethical conduct.

It is only by working together that we can enjoy lasting success and ensure that our outstanding research helps change society for the better.



Holger Hanselka
President and Chair of
the Executive Board



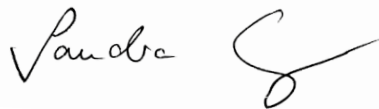
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1. Our responsibility for society

1.1 Human rights: protection for us all

The Guiding Principles on Business and Human Rights implementing the United Nations “Protect, Respect and Remedy” Framework lay the foundations for the protection of human rights worldwide.

Our contribution

We make a valuable contribution to the protection of human rights by remaining vigilant with regard to human rights violations. If we receive information about possible human rights violations, we use the secure electronic whistleblower system (BKMS® System) to report them.

We ensure that both we and our business partners fulfill our duty of care with regard to the identification and mitigation of risks potentially leading to human rights violations.

1.2 Scientific ethics: responsible research

We are aware of our responsibility to society with regard to research risks and freedom of research. It is important that this responsibility is fulfilled. When choosing projects, we must therefore weigh the anticipated added value against the risks that may arise in connection with the application of project results. We must also ensure that ethical standards are upheld when implementing projects.

Our research is intended to make a significant contribution towards overcoming current societal challenges. It generates impact by actively transferring project results via various transfer pathways, including contract research for companies, spin-offs, policy advice and transformative citizen science projects.

Our contribution

We apply recognized principles of scientific ethics and established codes of conduct when implementing projects. In some cases, we submit projects for review by the responsible ethics committees and put them to the vote as necessary.

We fulfill our responsibility by adhering to binding rules and support our research scientists by providing suitable training and continuing education programs. Our internal rules require our research scientists to perform risk assessments of their own projects as far as they are able. Additional support is provided by internal instruments such as a Fraunhofer guideline specifically for project teams (*Socially Responsible Research*) and continuing education courses on ethical reflection.

1.3 Conflicts of interest: handling and solutions

Conflicts of interests are situations in which personal matters may influence our objective judgment. This may apply, for example, to secondary employment, business relationships with so-called Fraunhofer-related companies (spin-offs and companies in which Fraunhofer staff, their relatives or Fraunhofer itself hold an interest) or in connection with insider information.

Our contribution

If conflicts of interest arise during the course of our work, or if someone attempts to influence our work in an improper manner, we consult the designated manager and/or central contacts. We disclose any secondary employment or private shareholdings in spin-offs or companies that maintain or plan to establish business relationships with Fraunhofer and obtain any permits that may be required. We refrain from making improper use of any insider information that becomes known to us during the course of our work.

1.4 Environmental responsibility and sustainable action: How we help protect the planet

For us at Fraunhofer, sustainability means taking full responsibility for a livable future and keeping future generations in mind in all our actions.

Our contribution

We transform ideas into innovative solutions designed to meet the great societal challenges of our time. We affirm our commitment to the Sustainable Development Goals (SDGs), e.g., in the areas of health and well-being and the circular economy and help shape a better world. Beyond our research activities, we embed the principle of ecological, economic and social sustainability as the cornerstone of responsible corporate governance throughout our organization. We pursue a climate strategy that enables us for example to consistently reduce the emissions caused by our scientific activities. We implement climate protection measures in the fields of organization, knowledge management, energy, buildings and mobility with the support of our own climate fund. Our goal is to halve our emissions by 2030 relative to 2019. Environmental management at Fraunhofer also prioritizes the careful, environmentally responsible use of resources.

We also fulfill our responsibility through social engagement, e.g., by making extensive efforts to cultivate young talent and facilitating programs that involve our communities in the research process. We meet our personal responsibility in the area of sustainability within the scope of our individual roles, e.g., by making environmentally conscious decisions regarding business travel and using resources sparingly.

We report regularly and transparently on our sustainability activities. Through our close partnerships with industrial companies and our self-image as a transparent and responsible service provider for Germany as an innovation hub, we will also align our reporting with the European standards of the new Corporate Sustainability Reporting Directive (CSRD) starting in 2025.

1.5 Non-profit status: working for the public good

We focus directly and exclusively on applied research as set forth in our statutes and are therefore recognized as a non-profit organization. Non-profit status is a fundamental requirement for all Fraunhofer activities. It also affords us certain benefits such as tax privileges.

Our contribution

We use our privileges responsibly and ensure that all our activities are carried out in alignment with our statutory purpose as a non-profit organization. We carefully examine which services can be offered under our statutes and under which conditions they can be provided. We do not pursue the intention of making a profit; any surplus is used to fund applied research as per our statutes.

1.6 Financial responsibility: prudent use of funds

The responsible handling of financial resources helps us achieve our long-term goals and maintain the financial stability of the Fraunhofer-Gesellschaft. It is also important to recognize that financial resources not only open up opportunities for action but are also assets that must be used responsibly and transparently. This particularly includes the economical and prudent use of funds, especially as Fraunhofer, as a recipient of taxpayer funding, is subject to strict budgetary regulations and a legal ban on preferential treatment.

We are aware that Fraunhofer is in principle not permitted to make donations or provide sponsorship for third parties. However, as a non-profit organization, we have the right to accept donations. These have no influence whatsoever on the strategic orientation of our research planning.

Our contribution

We handle financial resources responsibly, economically and prudently by ensuring that the funding we receive is used transparently and in accordance with the principle of causation, regardless of whether the projects in question are funded by industrial partners or from public monies. We comply with the terms and conditions imposed by the grant authorities and adhere to all relevant laws, regulations and internal guidelines. In order to create transparency and collect valid data for reporting purposes, we document our business activities in detail as set forth in our internal guidelines. This applies to all kinds of activities from recording the results of our research and development work to travel expense accounting. In doing so, we adhere to the German principles of proper accounting (GoBD). This approach strengthens public trust in Fraunhofer and promotes sustainable development.

1.7 Lobbying: representing political interests

As a non-profit organization, Fraunhofer actively participates in public debates and democratic decision-making processes, particularly in the area of research and innovation policy. We help policymakers formulate laws and guidelines by providing expertise and recommendations on scientific policy. Political advocacy allows us to contribute the perspective of applied research and promote balanced, well-informed political decision-making.

Our advocacy activities raise awareness of how research and innovation benefit society and the economy.

We provide scientifically substantiated input during legislative processes and ensure that the budget includes resources for scientific projects.

Our contribution

We act openly, transparently, honestly and with integrity during all our lobbying activities. We disclose both our activities and potential conflicts of interest. In doing so, we adhere strictly to statutory regulations, transparency obligations and the code of conduct specified in the German Lobbying Register Act (Lobbyregistergesetz, LobbyRG). Our lobbying activities are therefore publicly disclosed in the German Bundestag's lobby register and the European Union's transparency register.

Furthermore, we are bound by the grant authorities to comply with the principles governing our non-profit status and to ensure that our work is unbiased and evidence-based as required by the principles of scientific integrity and political neutrality.

2. Our responsibility as a business partner

2.1 Scientific integrity: good scientific practice

Scientific integrity is a fundamental ethical principle within the scientific community. It describes the responsibility of all researchers with regard to honesty and quality in their scientific work. This culture of good scientific practice is indispensable if knowledge is to be acquired and sustained cooperatively and society's trust in science is to be preserved. In contrast, scientific misconduct undermines this trust and damages not only the individual reputation of the research scientist concerned but also Fraunhofer's standing as a center of research excellence.

Our contribution

We adhere to the general principles of scientific practice during the course of our work. Besides acknowledging the current standard of knowledge, these principles include independence, objectivity and systematic skepticism toward our own results. We also ensure that the results we obtain can be repeated or reproduced, since this is an essential requirement for scientific excellence.

We instill the principles of good scientific practice during the training we provide for the next generation of scientists, the purpose being to ensure that they uphold these principles at all stages of their scientific careers. The ombudspersons at each institute also help foster scientific integrity and offer advice or mediation services in the event of conflicts.

If we receive internal or external information indicating possible scientific misconduct, we follow clear procedural rules to ensure that this is investigated and clarified independently. Incidents of this kind can be reported through the institute's ombudsperson, the Fraunhofer topic owner for good scientific practice or Fraunhofer's anonymous whistleblower system (BKMS® System).

2.2 Project management: implementing projects successfully and transparently

Our core business is to implement research projects in accordance with the regulations set forth in our statutes. Professional project management is indispensable to the successful achievement of this objective. Key prerequisites for success include defining clear targets and responsibilities, meeting commitments, and implementing projects in compliance with agreed timelines, budgets and processes. They also include transparent communication.

Our contribution

We familiarize ourselves with the processes and requirements defined internally for the management of projects and the conclusion of contractual agreements. We implement projects with due attention to the success factors outlined above and ensure that we keep adequate records (of both project content and funding). We also ensure that the services we render are aligned with our statutory purpose.

2.3 Procurement: fair and competitive

As a public-sector client, the Fraunhofer-Gesellschaft is subject to public procurement law. The Fraunhofer-Gesellschaft must therefore comply with specific regulations when procuring material resources and services. This is to ensure that public funds are used as economically as possible.

Our contribution

We comply with all applicable statutory requirements both as clients and as contractors, including those set forth in competition, antitrust and public procurement law. We adhere to the principles of economic efficiency, cost-effectiveness, equal treatment of competitors and transparent action when procuring capital goods, services and materials. We ensure that objective criteria are applied to select the supplier offering the best value for money and that our decision is properly justified and documented. We also involve the responsible purchasing departments/procurement coordinators early on in the process.

2.4 Corruption prevention: correct treatment of gifts and invitations

We understand corruption as the misuse of decision-making authority or a position of trust (public, private, financial or political) in order to obtain an unfair advantage for oneself or for a third party. This specifically includes criminal offenses defined by law, such as bribery, accepting bribes, breach of trust, fraud and—where applicable—violations of the general principles of ethical conduct that apply to business dealings.

Integrity and fairness are the bedrock of our reputation besides being vital to the quality of our services and key to our success. Corruption, on the other hand, harms our strong global reputation as a research organization. It undermines trust in the independence and integrity of science, politics and the entire public sector. Corrupt conduct can also have serious negative consequences both for Fraunhofer and for individual employees. Those involved may face financial losses, exclusion from public procurement procedures and even penalties under criminal law.

Fraunhofer maintains close ties with government and public administration due to its research activities. When interacting with public officials and elected representatives, i.e., individuals who hold office in governments or public administrations, we exercise particular caution with regard to any conduct that could give rise to suspicions of corruption. Openness and transparency are vital if we are to avoid even the appearance of undue influence from the outset. These groups are therefore subject to significantly stricter laws and regulations than those in the private sector (this applies not only in Germany but also abroad, cf. the anti-corruption laws in the USA (FCPA) and UK (UKBA)).

Our contribution

We neither offer nor accept considerations (gifts or other benefits) if doing so would create even the impression that decisions are being unduly influenced. We also comply with all applicable domestic and international anti-corruption laws and with our internal regulations, including those governing internal and external considerations and hospitality.

2.5 Export controls and customs: security in international trade

Export control regulations are imposed to limit and monitor international trade for security policy reasons. International trade encompasses the delivery of goods, technology and software, the provision of services and the exchange of expertise with third parties abroad. Cross-border deliveries also include temporary exports, for example during business trips, as well as technical transfers via email or cloud systems.

Customs regulations restrict the movement of goods to and from third countries (countries outside the customs territory of the European Union) and primarily serve to protect the economy, to control imports and exports subject to permit or licensing requirements and to enforce prohibitions and restrictions.

Transactions involving companies or individuals on sanctioned party lists are generally prohibited.

Our contribution

We comply with all regulations governing the import and export of goods, services and information. If we receive physical items (such as samples or specimens) from third countries during the course of our work, we obtain information from the responsible customs officer in advance. We consult our export control officer whenever we ship or supply goods (products, technology, software) internationally (i.e., also to other countries in the EU) and whenever we transfer knowledge abroad.

We also comply with export control and customs regulations when dealing with matters that have cross-border implications, i.e., business travel, sending emails, uploading data to cloud services, hosting foreign guests and recruiting staff.

2.6 Communication: striking a balance between transparency and confidentiality

Clear and open communication is essential for actively shaping dialog between science, industry, politics and the public. This guarantees high-quality communication and projects a consistent, transparent image both internally and externally.

Our contribution

In the event of media queries, we consult the PR or press officers at the relevant institute or at headquarters. With regard to media publications, we ensure that all the partners concerned have given their consent to any communication activities.

We avoid expressing personal opinions when participating in public events or posting on social media on Fraunhofer's behalf. Any personal opinions expressed are identified as such.

We are aware that internal statements, especially in larger forums, may eventually become public. In all forms of communication, we recognize that, as Fraunhofer employees, we serve as brand ambassadors and exercise a decisive influence over the organization's image, reputation and brand value.

3. Our responsibility at the workplace



3.1 HR recruitment: the pathway to Fraunhofer

The recruitment of qualified staff is a vital element of Fraunhofer's success. We therefore attach great importance to our employer communications and recruitment processes. Employer communications must be authentic, honest and provide insights into working at Fraunhofer for each of our target groups. Recruitment processes must be transparent, free from discrimination and conducted in accordance with the applicable laws and regulations. This includes job postings that comply with the General Act on Equal Treatment (Allgemeines Gleichbehandlungsgesetz, AGG), adherence to deadlines and the protection of personal data. The employee selection process must be free from bias and committed to equal opportunities. When dealing with applications, it is important that we act in the interest of all those involved and make decisions as quickly as possible during each step in the process.

Our contribution

We communicate authentically and honestly with potential and future staff. We treat applicants respectfully, appreciatively and without any form of discrimination.

We are aware that our employer communications and application processes influence the Fraunhofer-Gesellschaft's image as an employer and therefore contribute significantly to Fraunhofer's success in recruiting qualified staff.

Our managers ensure that recruitment processes are aligned with this Code of Conduct and act as ambassadors for our employer brand.

3.2 HR development: the time at Fraunhofer

The guidelines on Fraunhofer's fixed-term contract policy call for transparent, timely HR planning and ongoing support for career development as the basis of a relationship of trust with employees on fixed-term contracts. This ensures that Fraunhofer's interests are aligned with those of its fixed-term staff.

Fraunhofer's managers bear particular responsibility for safeguarding the organization's success, building trust and ensuring that Fraunhofer lives up to its reputation as a role model, especially with regard to the implementation and observance of its values and rules.

Our contribution

We contribute our knowledge and skills and tackle new challenges in order to grow and develop. To this end, we also take responsibility in our areas of work and actively shape our development in cooperation with our managers. We act considerably, fairly, respectfully and appreciatively, while pursuing open, factual and constructive dialog. We view mistakes and criticism as opportunities for improvement and do not hesitate to raise concerns or uncertainties openly.

We recognize the national and international labor laws and regulations that apply to us, adhere to the standards set by the International Labour Organization (ILO) and are members of the UN Global Compact (UNGC), a worldwide initiative by the United Nations. We take particular care to ensure that our employee and committee representatives can fulfill their statutory mandate, are elected freely and independently and are not exposed to any form of discrimination.

We offer our staff attractive development prospects, extensive opportunities to gain further qualifications and reliable working conditions tailored to different requirements and target groups. We communicate decisions regarding fixed-term and permanent contracts transparently and in a timely manner. We continually review our guidelines and instruments to ensure that staff are well supported in their development during their time at Fraunhofer and afterwards, and that the conditions are in place for attractive, fair, healthy and innovation-oriented scientific research. The Fraunhofer leadership principles provide support for our managers inasmuch as they express our understanding of joint leadership and provide orientation for their managerial work.

3.3 Diversity in action: equal opportunities for all

Diversity, fair opportunities and inclusion are core elements of our corporate policy and a responsibility shared by the Fraunhofer-Gesellschaft as a whole. We value the diversity of all employees as a productive resource, promote gender equality and foster a culture in which all staff feel welcome, respected and included. Only a strategy that pursues diversity, equal opportunities and inclusion can create a competitive edge and strengthen innovation through creativity and efficiency.

We see it as our mission to promote diversity among all Fraunhofer employees, take action against unequal treatment and create inclusive conditions for everyone. Our goal is to facilitate a working environment in which everyone feels safe, respected and valued, regardless of gender, background, sexual orientation or position. Sexual harassment and violence have no place in this environment.

Our contribution

We are committed to a workplace culture defined by mutual respect and appreciation. We strive to prevent and eliminate disadvantages for all staff. Sexual harassment, violence and discrimination, especially on the grounds of ethnicity, gender, religion, world view, disability, age or sexual identity, are not tolerated at Fraunhofer. We emphasize our unequivocal stance against discrimination by implementing a comprehensive diversity strategy that defines key areas for action. We have also signed the Diversity Charter, one of the largest employer initiatives promoting diversity.

3.4 Safety at the workplace: health in focus

Protecting our health—and with it our safety at the workplace—is of paramount importance to the Fraunhofer-Gesellschaft as an employer.

Our contribution

We comply with all applicable national occupational health and safety regulations and ensure that sufficient measures to safeguard health and safety at the workplace are enforced at all times. We take responsibility for all matters that could potentially impact our health and are particularly mindful of any health limitations affecting our colleagues. We make use of the many preventive and health-enhancing measures available to help us maintain and improve our health. We also participate regularly in occupational safety briefings and offer each other support. In the event of an occupational health and safety incident, we inform the responsible units (e.g., the occupational safety officer) without delay and provide all the information available. Our aim is to initiate the necessary measures to prevent or minimize damage as quickly and purposefully as possible.

3.5 Protecting information: information security, data protection and secrecy

During our daily work, we constantly generate and exchange information that may require special protection. This applies in particular to information that must be treated confidentially, such as personal data, business and trade secrets, data relating to our grant authorities, research methods and results and official classified information.

Our contribution

We comply with all valid and applicable regulations and internal guidelines when handling information. We see the protection of information as an integral part of our daily work and comply with data protection regulations*, especially when handling personal data. We base our information protection measures on recognized information security and data protection standards, in particular ISO/IEC 27001, ISO/IEC 27002 and ISO/IEC 27701.

If a project is officially classified, we implement the measures specified by law to protect its content.

We use computers, smartphones, storage media and paper documents carefully and securely, both at the office, when working from home and while traveling.

We know how important and valuable our expertise and intellectual property are to Fraunhofer. We therefore protect it from unauthorized disclosure to third parties who have no right to it. We respect the expertise and intellectual property of our business partners and only use it insofar as we are authorized to do so.

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