

COMPLIANCE POLICY

Reform Institute Foundation

1. Values and objectives

Proper operation of Reform Institute (hereinafter the “Institute”) represents the common good of the team.

The purpose of this Compliance Policy (hereinafter the “Policy”) is to ensure efficient implementation of the Institute’s mission by making the whole team aware of the principles of compliance with the law, ethical standards and moral obligations.

2. Subjective scope

All team members, regardless of the basis of employment, are obligated to follow this Policy.

3. Violations

3.1. In this Policy a violation will mean a wilful action or omission which:

- violates or threatens the interests of the Institute, team members, partner organisations of the Institute (partners, grantors, clients) or other external stakeholders; and
- breaches the law, especially in relation to employee’s duty of loyalty referred to in Article 100 Section 4 of the Labour Code, provisions of contracts that provide the basis for employment at the Institute, provisions of contracts made between the Institute and third parties, internal regulations of the Institute (rules, policies, procedures) and commonly accepted standards of integrity.

3.2. Violations will include, in particular:

a. Violation of the principle of scientific integrity

The Institute carries out research with integrity and without bias (principle of scientific integrity). Our findings are based on an objective and comprehensive analysis of available data. The principle of scientific integrity is applied to research whose results can influence public policies as well as research performed for the internal use of the Institute's clients.

b. Copyright infringement

In preparing papers, reports and analyses our team members respect the work of other authors: they properly name the sources of information and follow applicable regulations of law and good practices (cf.

https://owl.purdue.edu/owl/avoiding_plagiarism/best_practices.html)

c. Unfair competition

The Institute complies with competition laws when it bids for public tenders itself and when it makes decisions on the award of contracts financed with public funds. Team members should give special consideration to the following:

- (i) Participation of the Institute in a technical dialogue¹. The scope and form of consultations in which the Institute is involved as part of a technical dialogue cannot lead to the Institute gaining a privileged position in a public tender process initiated in connection with the technical dialogue. In case of any concerns, a team member who is in charge of the dialogue should consult the Institute's Management Board.
- (ii) Selection of partners or contractors for publicly-funded projects should:

¹ The scope and rules of participation in technical dialogues are set out in Article 31a of the Public Procurement Act of 11 September 2019, which states that:
„1. Before commencing a contract award procedure, the contracting authority may inform the contractors about plans and expectations relating to the contract, and, in particular, conduct a technical dialogue, by addressing experts, public authorities or contractors, seeking advice or information necessary for preparation of the description of the subject-matter of contract, tender specification, or conditions of the contract.
2. Technical dialogue should be conducted in a manner ensuring fair competition and equal treatment of potential contractors and their solutions.”

- be based on impartial, objective and transparent criteria; the decisions cannot be in any way arbitrary,
- ensure all interested parties have equal access to information,
- ensure all interested parties can be provided with justification of the Institute's decision,
- if evaluation criteria apply, e.g. quality criterion, the evaluation must be impartial and diligent.

d. Corruption

In connection with their employment at the Institute members of the team will neither accept nor offer any undue financial or personal benefits in their own name or on behalf of anybody else.

The only exception to the rule will be symbolical gifts accepted as part of collaboration with partners, such as albums, calendars, cups or other items with partner's logo, or food products. The gift may not cause the recipient to feel a sense of indebtedness.

Any gift that fails to meet the above criteria should be returned with a thank-you note and explanation that its acceptance would constitute a violation of the Compliance Policy applicable within the Institute.

- e. Failure to report a conflict of interest according to the Conflict of Interest Policy
- f. Breach of confidentiality of information in violation of an employment contract or personal data protection obligations referred to in the Personal Data Protection Policy
- g. Breach of the non-compete clause contained in an employment contract
- h. Breach related to financial matters (e.g. inaccurate reimbursement of travel expenses, reimbursement of non-justified expenses)
- i. Mobbing, discrimination, other conduct described in the Diversity Policy

4. Prevention and response

4.1. The Institute prevents violations, in particular, through:

a. Education

The Management Board of the Institute will arrange regular training for the team on relevant areas. Depending on the needs, the training will be addressed to the entire team or only members whose work is concerned with the issues covered by that training.

b. Resolving concerns

The Institute aims to build a culture of open communication where every team member is free to discuss their concerns about everyday professional situations, e.g. practical application of contractual provisions or other matters, with their superior or person in charge of the relevant area.

4.2. Any person who becomes aware of an actual or threatened gross violation should report it to a competent team member. It is recommended that the violation be reported first to the direct superior or person in charge of the relevant area. In special cases, e.g. when the violation is committed by the direct superior, it should be reported to the Management Board of the Institute via email, or in person (see Appendix no. 1 – Contact Details). Unless initially made in writing, the report should be recorded in the form of a written report. Reports should be made only if there are reasonable grounds to believe that the information reported is true. The Management Board will protect whistleblowers against retaliation.

4.3. Any action or omission in contravention of this Policy may constitute a breach of obligations, including a gross breach of basic obligations, in particular, the obligation to protect the interests and good name of the Institute, and, as a consequence, may provide grounds for immediate termination of the employment contract.

Notwithstanding employee's liability for breach of obligations towards the employer, as specified above, any action in contravention of this Policy may render the breaching employee liable under law, including criminal law.

5. Adoption, access, review

This Policy was adopted by the Management Board of the Institute under the resolution no. 2023/XI/2 of 3 November 2023.

The text of the Policy was made available to all team members and it will be made available to every new member.

This Policy is available in the Institute's cloud and on its website at www.ireform.eu.

Questions about the Policy should be directed to Operations Specialist or Members of the Management Board via email (see Appendix no. 1).

This Policy will be reviewed every 2 years.

Appendix no. 1 Contact Details

Full name	Position	Email address
Krystyna Kowalska	Operations Specialist	krystyna.kowalska@ireform.eu
Aleksander Śniegocki	President of the Management Board	aleksander.sniegocki@ireform.eu
Zofia Wetmańska	Vice President of the Management Board	zofia.wetmanska@ireform.eu