



## ANTI-FRAUD AND CONFLICT OF INTEREST POLICY

The Centro Nacional de Investigación sobre la Evolución Humana (CENIEH) is committed to respect for the Constitution and the rest of the legal order, conduct that is upright, diligent, and responsible, in an endeavor to reach professional excellence, a prohibition upon arbitrariness, and impartiality, and includes a duty to abstain in those matters where there is a conflict of interest, and the vocation for service, loyalty to the Center, efficiency and thriftiness, confidentiality, and environmental protection.

The CENIEH declares its firm and stringent rejection of any form of corruption, bribery, or conduct that is fraudulent or could constitute a conflict of interest, 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.

All members of the governing and administrative bodies of the CENIEH, as well as all its employees, undertake the following commitment:

1. Proper management of public resources, which means not using them for activities other than those permitted by the regulations applicable, with full dedication directed at satisfying the general interest, while refraining from any conduct that could be contrary to those principles.
2. Not to offer or concede, either directly or indirectly, nor to 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.

They likewise undertake a commitment not to accept gifts or other courtesies offered because of the post or position they occupy at the CENIEH, unless these are of little value or merely symbolic. This category includes advertising and promotional gifts.

3. Respect the principle of impartiality, to maintain independence of judgment that is at arm's length from any individual interest. Not to avail of their position to obtain personal or material advantages, and acting with full respect for the norms regulating incompatibilities and conflicts of interest, eschewing situations, activities, or interests incompatible with their duties, refraining from intervention in matters when their objectivity could be affected for any reason, and reporting any situation that could constitute a conflict of interest to their immediate superior.

They shall specifically refrain from intervention in procedures in which any of the following circumstances is applicable:



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- a) Possessing a personal interest in the matter in question or any other whose resolution could influence the former; being an administrator of a company or entity which is an interested party, or when there are legal questions pending with some interested party.
  - b) Possessing a relationship of marriage or assimilable civil partnership, or relationship up to the fourth degree of consanguinity or the second degree of affinity, with any of the interested parties, with the administrators of entities or companies that are interested parties or with the advisers, legal representatives or managers intervening in the procedure, sharing a professional practice or being an associate of the latter for the purposes of consultancy, representation, or management.
  - c) Having a close friendship or clear enmity with any of the persons mentioned in the previous section.
  - d) Having intervened as expert witness or witness in the procedure in question.
  - e) Having a service relationship with any natural or legal person with a direct interest in the matter, or have provided professional services of any type and in any circumstance or place, within the last two years.
4. Communicate immediately any detection, doubts, or suspicions about any form of corruption, fraud, or conflict of interest using the whistleblower channel provided.
  5. Act with due diligence in compliance with the duties and obligations arising out of the present declaration, and assume any liability for noncompliance, or noncompliance by other persons for whom they are responsible.

Through this policy, the CENIEH aims to promote a culture within the organization that averts any corrupt or fraudulent activity, or any constituting a conflict of interest, which facilitates detection and prevents its commission, by fomenting the development of internal procedures which incorporate these principles, and which are effective for preventing, detecting, and managing such eventualities.

In summary, the CENIEH has a 'zero tolerance' policy toward fraud, corruption and situations constituting a conflict of interest, and this is pursued through a control system designed to prevent and detect such acts wherever possible.

We consider that compliance with this policy is the responsibility of all members of the governing and administrative bodies of the CENIEH, as well as our employees.

Date of approval: 27/07/2022  
Governing Council