

Sir Roger Penrose Institute
for Interdisciplinary Sciences

**Ethical, Anti-Corruption
and Conflict of Interest Policy**

Internal and public document of the Institute

Adopted by Resolution of the Management Board
of the Institute
No. 1/10/2025
of 28 October 2025

Contents

1 Purpose of the document	2
2 Scope of application	2
3 Fundamental ethical principles of the Institute	3
4 Prohibition of corruption	3
5 Conflict of interest	4
6 Gifts, invitations and hospitality	5
7 Donations, funding and cooperation	6
8 Research and analytical independence	6
9 Support programmes, applications and assessment of beneficiaries	7
10 Cooperation with public institutions	7
11 Cooperation with experts, authors and reviewers	8
12 Confidentiality and protection of information	8
13 Publication integrity and protection of authorship	9
14 Reporting violations	9
15 Procedure in the event of a violation	10
16 Responsibility for compliance with the Policy	11
17 Transparency, updating and application of the document	11
18 Final provision	11

1. Purpose of the document

This Ethical, Anti-Corruption and Conflict of Interest Policy defines the fundamental principles governing the activities of the Sir Roger Penrose Institute for Interdisciplinary Sciences in the areas of research integrity, analytical independence, organisational transparency, anti-corruption measures, prevention of conflicts of interest, and protection of public trust in the Institute's activities.

The Institute conducts scientific, analytical, publishing, educational, social and expert activities. Within this framework, it prepares publications, reports, systemic analyses, support programmes, educational projects, methodological documents and proposals for cooperation with public, private, academic and social entities.

The purpose of this Policy is to ensure that all such activities are carried out in an honest, impartial, transparent, responsible and influence-resistant manner, so that no external or internal pressure may compromise the independence of the Institute, distort substantive assessment, or create the impression that decisions of the Institute may depend on personal, financial, organisational or environmental benefits.

This Policy is both an internal and a public document. It may serve as a point of reference for persons cooperating with the Institute, recipients of its publications, institutional partners, participants in support programmes, experts, authors, reviewers, contractors, donors and entities interested in cooperation.

2. Scope of application

This Policy applies to all activities conducted by the Institute, in particular to:

1. scientific, research and analytical activities;
2. publishing activities, including the publication of the Report K* series and other publications of the Institute;
3. educational, training and popularisation activities;
4. support programmes, funds, grants, competitions and social projects;
5. cooperation with universities, public institutions, non-governmental organisations, enterprises and individuals;
6. preparation of reports, opinions, recommendations, analyses, expert assessments and strategic documents;
7. conclusion of contracts, acceptance of donations, project financing and provision of services;
8. relations with experts, authors, consultants, reviewers, contractors and subcontractors;
9. protection of confidential information, personal data and the Institute's proprietary methodology.

This Policy applies to members of the Institute's bodies, persons employed by the Institute, persons cooperating with the Institute under civil law contracts, experts, authors, reviewers, consultants, volunteers, contractors and other persons acting on behalf of or for the benefit of the Institute, to the extent corresponding to the nature of their cooperation.

3. Fundamental ethical principles of the Institute

The activities of the Institute are based on the principles of integrity, independence, transparency, impartiality, responsibility and protection of the public good.

Integrity means the obligation to formulate analyses, opinions, reports, publications and recommendations on the basis of available knowledge, data, arguments, methodology and clearly defined assumptions. Integrity also requires indicating the limitations of the adopted method, the nature of the data, the degree of certainty of conclusions, and the conditions under which a given hypothesis may be confirmed, weakened or falsified.

Independence means that the positions, reports, publications and decisions of the Institute may not be subordinated to the interest of an external funding entity, client, partner, donor, political, business or private environment. Independence does not exclude cooperation, funding or the implementation of commissioned projects, but it requires that the nature of such cooperation be properly indicated and that it does not affect the substantive integrity of the work.

Transparency means the obligation to disclose circumstances that may be relevant to the assessment of impartiality, credibility or the manner in which a given document, decision or recommendation was prepared. Transparency applies in particular to sources of funding, conflicts of interest, organisational links, the nature of a report, the type of cooperation and the limitations of the data used.

Impartiality means that decisions concerning cooperation, support, publication, expert participation, assessment of applications, recommendations or granting access to the Institute's programmes should be made according to substantive criteria, and not according to personal, social, political, financial or environmental connections.

Responsibility means that the Institute takes into account the consequences of its actions for recipients, partners, beneficiaries, public institutions, scientific debate, social debate and trust in independent systemic analysis.

Protection of the public good means that the activities of the Institute, even when they include the sale of publications, paid reports, support programmes or commercial projects, must not compromise the Institute's fundamental purpose, which is the development of knowledge, systemic diagnosis, independent analysis and responsible thinking about complex social, scientific, technological and institutional processes.

4. Prohibition of corruption

The Institute applies a zero-tolerance principle towards corruption.

Corruption means requesting, proposing, giving, accepting or promising any undue benefit, directly or indirectly, where such benefit is intended to influence the performance of duties, a

decision, assessment, recommendation, selection of a partner, granting of support, content of a report, outcome of an analysis, conclusion of a contract or any other action taken by the Institute or by a person acting on its behalf.

A benefit may in particular be financial, material, personal, professional, organisational, political, environmental or reputational. A benefit may consist not only in the transfer of money or a gift, but also in the promise of employment, a commission, publication, recommendation, access, promotion, invitation, preferential treatment, support or any other service.

In particular, it is prohibited to:

1. accept or offer money, gifts, services, invitations, benefits, commissions, discounts, fees or other advantages in exchange for a favourable decision of the Institute;
2. make the content of an analysis, report, opinion, recommendation or publication dependent on the interest of a funding entity, client, partner, donor or commissioning party;
3. offer benefits to persons performing public functions, representatives of institutions, experts, reviewers, members of committees, employees of universities, organisations or enterprises in order to obtain preferential treatment;
4. accept benefits in exchange for accelerating a procedure, changing an assessment, disclosing information, omitting criteria, recommending a person or entity, or limiting the competitiveness of a process;
5. create sham contracts, fictitious commissions, inflated invoices, unjustified fees or other arrangements intended to conceal the transfer of benefits;
6. use the activities of the Institute to build private dependencies, pressure, obligations of gratitude or informal channels of influence.

The Institute does not participate in activities that could be regarded as an attempt to circumvent the law, abuse procedures, unlawfully obtain public funds, informally influence decisions of public institutions or conceal the actual purpose of transferring funds.

5. Conflict of interest

A conflict of interest occurs when a private, family, financial, professional, political, environmental or organisational interest may influence, appear to influence or be perceived as capable of influencing the impartiality of a decision made on behalf of the Institute.

A conflict of interest does not always constitute misconduct. The mere occurrence of a conflict of interest may be a natural phenomenon in expert, scientific, social and organisational activity. What is essential, however, is its disclosure, assessment and proper management.

A person acting on behalf of the Institute should disclose a conflict of interest in particular when he or she:

1. assesses an application submitted by a person, institution, company or organisation with whom or with which he or she has personal, family, professional, financial or environmental relations;

2. participates in the preparation of a report, analysis or opinion concerning an entity with which he or she cooperates, has cooperated or plans to cooperate;
3. may obtain a personal benefit from a decision of the Institute;
4. recommends a person, entity, publication, solution, technology or service with which he or she is connected;
5. takes part in a decision concerning the granting of support, an order, licence, access, patronage or cooperation with an entity with which he or she has a relationship that may raise doubts as to impartiality;
6. possesses confidential information that could be used for the private benefit of himself or herself or of third parties.

In the event of a conflict of interest, the person concerned should immediately inform the person responsible for the given process and, where required by the circumstances, withdraw from assessment, recommendation or decision-making.

The Institute may decide to allow a given person to continue participating in a matter if the conflict of interest is insignificant, has been disclosed, does not affect the substantive assessment and does not create a risk of loss of trust in the procedure. Such a decision should, however, be justified and documented.

6. Gifts, invitations and hospitality

The Institute permits the acceptance of minor customary forms of courtesy, provided that they are symbolic in nature, do not influence any decision, do not create an obligation and cannot reasonably be regarded as an attempt to exert influence.

It is unacceptable to accept gifts, invitations, services, benefits, fees, trips, coverage of costs, discounts or other advantages if they:

1. are connected with an ongoing process of selecting a partner, contractor, beneficiary, expert, reviewer or supported entity;
2. may influence an assessment, recommendation, decision, publication or the content of an analysis;
3. are disproportionate to the customary nature of the relationship;
4. are provided in a non-transparent manner;
5. come from an entity expecting a favourable outcome;
6. could expose the Institute to allegations of bias, dependency, lack of transparency or loss of independence.

In case of doubt, the person who has been offered a gift or benefit should refuse to accept it or report the matter for assessment before accepting it.

If refusal to accept a minor gift could be regarded as an unjustified breach of courtesy customs, the gift should be reported and, where possible, treated as the property of the Institute rather

than as a private benefit of the person who received it.

7. Donations, funding and cooperation

The Institute may accept donations, grants, payments, project financing, income from the sale of publications, remuneration for dedicated reports, fees, licence payments and other funds consistent with the law and the statutory scope of its activity.

However, the acceptance of funds must not mean granting the donor, client, sponsor, partner or commissioning party influence over the independent outcome of an analysis, the position of the Institute, the content of a report, methodological assessment, a decision on support or a recommendation.

In particular:

1. funding must not be used to purchase a specific analytical conclusion;
2. commissioning a report must not entail the right to impose an outcome favourable to the commissioning party;
3. a donation must not confer the right to preferential participation in support programmes;
4. partnership must not entail the omission of assessment procedures;
5. commercial cooperation must not be concealed as independent public analysis;
6. publications of the Institute must not be transformed into disguised sales offers.

The Institute may refuse to accept a donation, funding, commission or proposal for cooperation if its source, conditions, purpose, manner of transfer or accompanying circumstances could compromise the independence of the Institute, raise justified ethical doubts or damage the credibility of its activities.

8. Research and analytical independence

The Institute protects research and analytical independence as one of the fundamental conditions of its credibility.

Reports, analyses, publications, opinions, recommendations, support programmes and decisions of the Institute should be prepared in accordance with the adopted methodology, current knowledge, principles of integrity and clearly described limitations.

The K* model and other analytical tools of the Institute are diagnostic, interpretative and systemic in nature. Their function is not to sell a predetermined answer, but to identify relations between tension, stabilisation, coherence, risk of regime transition and possible trajectories of development of the analysed system.

It is unacceptable to:

1. adjust the outcome of an analysis to the expectations of a client, partner, donor or environment;
2. omit data that weaken a hypothesis;

3. present a hypothesis as certainty if it is probabilistic, diagnostic or conditional in nature;
4. conceal the limitations of the model;
5. create the appearance of independence where an analysis was commissioned and should be identified as a dedicated report;
6. use the authority of the Institute to legitimise decisions that the Institute has not substantively assessed.

If a report, analysis or opinion is prepared at the request of a specific entity, this should be appropriately indicated, unless the contract, the nature of the matter or the protection of confidential information justifies a different solution. Such indication does not have to disclose protected information, but it should prevent the misleading impression that the document is a fully independent public publication if, in fact, it was prepared as a dedicated study.

9. Support programmes, applications and assessment of beneficiaries

If the Institute conducts support programmes for universities, experts, researchers, organisations, students, authors, social initiatives or other entities, the assessment of applications should be carried out according to substantive criteria made known to the participants of the given programme.

In particular, situations should be avoided in which the granting of support is determined by:

1. personal sympathies or antipathies;
2. family, social, political or environmental connections;
3. informal recommendations;
4. promises of future cooperation;
5. financial or organisational benefits;
6. external pressure;
7. expectation of a favourable publication, statement, opinion or promotion.

Persons assessing applications should disclose conflicts of interest and withdraw from assessment where their impartiality could be questioned.

The Institute may apply simplified procedures in small-scale, pilot, internal or experimental programmes, but even in such cases it should preserve the fundamental principles of integrity, transparency and non-discriminatory treatment of participants.

10. Cooperation with public institutions

In contacts with public institutions, the Institute acts with particular diligence, since relations with public administration, public universities, local government units, services, state institutions and entities financed from public funds require an enhanced standard of transparency.

The Institute does not offer, transfer or promise any benefits to persons performing public functions in exchange for a decision, recommendation, purchase, patronage, invitation, funding, access, preferential treatment or any other action favourable to the Institute.

The Institute also does not accept proposals for cooperation if their condition would be informal remuneration, omission of procedures, concealment of the true nature of the project, inflation of costs, fictitious provision of services or unauthorised use of public funds.

In the case of projects financed or co-financed from public funds, the Institute should apply the principles of economy, purposefulness, reliable documentation of expenditure, compliance with the contract and transparency towards the funding entity.

11. Cooperation with experts, authors and reviewers

Experts, authors, reviewers, consultants and collaborators of the Institute should perform their tasks in a reliable, independent manner and in accordance with the scope of the work entrusted to them.

It is unacceptable to:

1. accept remuneration or benefits from a party interested in the outcome of an analysis without disclosing this fact;
2. review or assess the work of a person with whom there is a significant conflict of interest;
3. use confidential information obtained in the course of cooperation with the Institute;
4. claim authorship of another person's concepts, analyses, data, text fragments or methods;
5. influence the outcome of an assessment through private or environmental relations;
6. present a private position as the position of the Institute without authorisation.

Authors, experts and reviewers should disclose significant connections that may be relevant to the assessment of their impartiality. This applies in particular to financial, organisational, professional, political or personal connections with entities concerned by an analysis, publication, recommendation or decision of the Institute.

12. Confidentiality and protection of information

Persons cooperating with the Institute are obliged to protect confidential information, in particular information concerning:

1. unpublished reports, analyses and publications;
2. internal research methodology;
3. data provided by partners, beneficiaries, clients, experts or institutions;
4. documents related to support programmes;
5. applications and assessments of beneficiaries;
6. non-public financial, licensing or organisational arrangements;

7. personal data;
8. know-how, concepts, models, analytical structures and projects developed by the Institute.

Confidential information must not be used for private benefit, transferred to unauthorised persons or used to influence decisions of the Institute or external entities.

The obligation to maintain confidentiality also applies after the end of cooperation with the Institute, unless the information has become publicly available in a lawful manner or the Institute has consented to its disclosure.

13. Publication integrity and protection of authorship

The Institute recognises publication integrity as part of organisational ethics. Publications, reports, articles, educational materials, presentations and studies prepared by the Institute or in cooperation with the Institute should respect copyright, citation rules, source attribution and protection of intellectual contribution.

It is unacceptable to:

1. claim authorship of another person's texts, concepts, data, charts, models or fragments of studies;
2. use third-party materials without indicating the source where such indication is required;
3. manipulate quotations, data or context in order to achieve a predetermined effect;
4. remove information about the author, co-author, source, licence or scope of use of the material;
5. publish materials that infringe the rights of third parties;
6. conceal a significant contribution of a person who actually participated in the creation of a work.

The Institute may use digital tools, information systems and artificial intelligence tools to support editorial, organisational, analytical or technical work. However, responsibility for the content of publications, the reliability of conclusions, the selection of sources and the final form of the work rests with the human being identified as the author, editor or person responsible for the document.

14. Reporting violations

Any person who obtains information about a possible violation of this Policy should report the matter to the person responsible for the relevant area of the Institute's activity or directly to the Management Board of the Institute.

A report may concern in particular:

1. suspected corruption;
2. conflict of interest;

3. attempted pressure;
4. acceptance or offering of an undue benefit;
5. irregularities in the assessment of applications;
6. unauthorised use of confidential information;
7. fictitious services, inflated costs or unreliable settlements;
8. violation of analytical independence;
9. plagiarism, data manipulation or research misconduct;
10. actions that may harm the reputation of the Institute.

The Institute should ensure that a person reporting a violation in good faith is not exposed, for that reason, to retaliation, exclusion, worse treatment or unjustified consequences.

A report made in good faith means a report based on a justified belief that a violation may have occurred, even if subsequent clarification of the matter does not confirm the violation. Protection does not apply, however, to the deliberate transmission of false information in order to harm another person or the Institute.

15. Procedure in the event of a violation

After receiving a report, the Institute should make a preliminary assessment of the matter, secure available information and determine whether there are grounds for further action.

Depending on the nature of the violation, the following actions may be taken:

1. clarification of the matter and closure without further action if the report proves unfounded;
2. request for explanations from the person concerned;
3. exclusion of a person from a given decision-making process;
4. refusal to accept a donation, commission, invitation or benefit;
5. termination of cooperation;
6. correction of a procedure;
7. annulment of an assessment, recommendation or decision;
8. notification of the competent authorities if there is suspicion of a criminal offence;
9. taking remedial measures to reduce the risk of similar violations in the future.

Explanatory proceedings should be conducted with respect for the dignity of the persons concerned, the principle of confidentiality, the right to provide explanations and the proportionality of measures taken by the Institute.

16. Responsibility for compliance with the Policy

All persons acting on behalf of or for the benefit of the Institute are responsible for compliance with this Policy, to the extent corresponding to their role, access to information and influence on decisions.

Special responsibility rests with persons who:

1. represent the Institute externally;
2. conclude contracts;
3. accept financial resources;
4. conduct support programmes;
5. assess applications;
6. prepare reports and recommendations;
7. contact public institutions;
8. have access to confidential information;
9. make decisions concerning cooperation, publication, licences, patronage, purchases or services.

The Management Board of the Institute is responsible for adopting, updating and supervising the application of this Policy. In the event of an expansion of the Institute's activities, the Management Board may adopt additional detailed procedures concerning, in particular, support programmes, cooperation with public institutions, procurement, donations, whistleblower protection, publication review or assessment of conflicts of interest.

17. Transparency, updating and application of the document

This Policy may be published on the Institute's website as a document confirming the ethical, anti-corruption and organisational standards of the Institute.

The Policy should be reviewed and updated periodically, especially in the event of expansion of the Institute's activities, launch of new support programmes, commencement of cooperation with public institutions, acquisition of external funding, entry into international projects or changes in the law.

Updating the Policy does not require a change in its fundamental purpose. Its task remains the protection of the independence, integrity, transparency and credibility of the Institute.

18. Final provision

The Sir Roger Penrose Institute for Interdisciplinary Sciences operates in areas in which knowledge, analysis, methodology, technology, education and social responsibility meet institutional, economic and public interests. For this reason, the ethical standard of the Institute cannot be limited to a formal prohibition of corruption.

The true purpose of this Policy is to protect the coherence of the Institute’s activities: the consistency between what the Institute declares, what it analyses, what it publishes, what it offers and how it makes decisions.

The Institute cannot diagnose the loss of coherence in complex systems if it does not protect its own organisational coherence.

Therefore, every decision made on behalf of the Institute should pass a simple ethical test:

Would this decision remain defensible if it were publicly described together with its justification, connections, sources of funding and consequences?

If the answer is negative or raises serious doubts, the decision requires reassessment.

Document adopted by Resolution of the Management Board of the Sir Roger Penrose Institute for Interdisciplinary Sciences No. 1/10/2025 of 28 October 2025.

Signature of authorised person

Signature of authorised person