



HRS4R ACTION PLAN

In the initial action Plan 21 from 40 C&C principles were prioritized. During this interim Assessment (2019), considering the analysis made by the focus group and the C&C Monitoring team, 13 additional principles also have been addressed since they are embedded within the POLYMAT 2018-2021 strategic plan.

I. Ethical and professional aspects

	C&C Principles		I. Ethical and professional asp	Decis	Implementation	Indicators/evidence	Status
Relevant Legislation / Category C&C	Related	Existing Institutional rules and/or practices	Actions implemented & required	Responsible	Due date	indicators evidence	Status
1. Research freedom	n n						
✓ Spanish Intellectual property Law ✓ Spanish Data Protection Law (LOPD) ✓ Spanish Science Law ✓ Spanish Statute of Worker's rights.	1,2,3,5,6,7,8, 10, 23,31,34.	✓ Polymat's Mission, Vision and Values. ✓ Scientific Committee Advisory Board ✓ C&C Endorsement	 ✓ On 21 December 2017, the Board of Trustees unanimously agreed to approve the organisation and management model - criminal risk prevention manual - designed and prepared for the entity in accordance with article 31 bis, which includes the following documentation, also unanimously approved, including the necessary control measures:	C&C Monitoring Team	2017	 ✓ December 2017 approved all documents by POLYMAT'S Board (Certificates signed available on request only for the assessor). ✓ Training Sessions about HR Logo and Compliance given to all the Staff June 2018 (Registry Document signed by the Staff available on request only for the assessor). http://www.polymat.eu/uploads/planaccion/trainingsessionsip2017.pdf ✓ An Ethical-Grievance Channel created and published on the web site (canaletico@polymat.eu) http://www.polymat.eu/en/ethical-channel ✓ In 2017, a Compliance Officer Appointed. (Certificates signed available on request only for the assessor). ✓ Compliance documents published on the intranet.	Completed



3. Professional responsibility



1,2,3,5,6,7,8, 10, 23,31,34. Nission, Vision and Values. Findorsement of C&C (Commitment of Founding Partners) Findorsement of Founding Partners) For December 2017, the Board of Trustees unanimously agreed to approve the organisation and management model - criminal risk prevention manual designed and prapared for the entity in accordance with article 31 bis, which includes the following documentation, also unanimously approved, including the necessary control measures: a / Code of Ethics. b / Acceptable use of IT resources policy. c / Policy for Risk Management of Fraud, Bribery and Corruption. d / Ethical- Grievance Channel. e / Disciplinary regime. 7 Training and Dissemination to the Staff June 2018 9 On March 21st 2019 the Board of Trustees unanimously approved the New Policies of Respect for People and adherence of suppliers to the POLYMAT Compliance model, also agreeing its implementation and dissemination) **Training Additional Compliance of the Polyman and Corruption. Training Additional Compliance of the Polyman and Corruption. A region of the sasessor). Training Additional Compliance of the Web Policies of Respect for People and adherence of suppliers to the Polyman accommission of the Staff June 2018 9 On March 21st 2019 the Board of Trustees unanimously approved the New Policies of Respect for People and adherence of suppliers to the Polyman accommission of the Staff June 2018 1
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Spanish Intellectual Property Law 1,2,3,5,6,7,8, 10,23,31,34. Scientific advisory board Intellectual Property & Dissemination guidelines. Contracts and collaboration agreements. Polymat's Polymat's Prounding Partners) Partners Polymat's Polymat's Pounding Partners Polymat's Pounding Partners Polymat's Polymat's Pounding Partners Polymat's Polymat's Pounding Partners Polymat's Pounding Partners Polymat's Polymatical Polym	C&C Monitoring Team	December 2017	 ✓ December 2017 approved all documents by POLYMAT'S Board (Certificates signed available on request only for the assessor). ✓ Training Sessions about HR Logo and Compliance given to all the Staff June 2018 (Registry Document signed by the Staff available on request only for the assessor).	Completed
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5. Contractual and legal obligation



6. Accountability











✓ Spanish Intellectual property Lav ✓ Spanish Data Protection Law (LOPD) ✓ Spanish Risk Prevention Law	✓ Annual Risk Prevention Plan ✓ Risk lab auc ✓ External advice risk prevention specialist (IMQ). ✓ Intellectual Property protection guideline ✓ Data safe procedure.	ts ✓ On 21 December 2017, the Board of Trustees unanimously agreed to approve the organization and management model - criminal risk prevention manual - designed and prepared for the entity in accordance with article 31 bis, which includes the following documentation, also unanimously approved, including the necessary control measures: a/ Code of Ethics. b/ Acceptable use of IT resources policy. c/ Policy for Risk Management of Fraud, Bribery and Corruption. d/ Ethical-Grievance Channel. e/ Disciplinary regime. ✓ On March 21st 2019 the Board of Trustees unanimously approved the New Policies of Respect for People and adherence of suppliers to the POLYMAT Compliance model, also agreeing its implementation and dissemination)	C&C Monitoring Team	December 2017	\[\lambda \]	December 2017 approved all documents by POLYMAT'S Board (Certificates signed available on request only for the assessor). Training Sessions about HR Logo and Compliance given to all the Staff June 2018 (Registry Document signed by the Staff available on request only for the assessor). http://www.polymat.eu/uploads/plan-accion/trainingsessionsip2017.pdf An Ethical-Grievance Channel created and published on the web site (canaletico@polymat.eu) http://www.polymat.eu/en/ethical-channel In 2017, a Compliance Officer Appointed. (Certificates signed available on request only for the assessor). Compliance documents published on the intranet. http://www.polymat.eu/uploads/plan-accion/acceptableuseofitresources.pdf http://www.polymat.eu/uploads/plan-accion/codeofethics.pdf http://www.polymat.eu/uploads/plan-accion/compliancessessessmentreport.pdf http://www.polymat.eu/uploads/plan-accion/ethicschanel.pdf http://www.polymat.eu/uploads/plan-accion/ethicschanel.pdf http://www.polymat.eu/uploads/plan-accion/modelofirmacetico.pdf http://www.polymat.eu/uploads/plan-accion/modelofirmacetico.pdf http://www.polymat.eu/uploads/plan-accion/modelofirmacetico.pdf http://www.polymat.eu/uploads/plan-accion/modelofirmacetico.pdf http://www.polymat.eu/uploads/plan-action/policyforfraud.briberyandcorruption.pdf March 21st 2019 the Board of Trustees unanimously approved the New Policies of Respect for People and adherence of suppliers to the POLYMAT Compliance model (Certificates signed available on request only for the assessor). http://www.polymat.eu/uploads/plan-accion/policyonrespectforpeople.pdf	Completed
8. Dissemination,							





	Spanish intelectual property Law Spanish Data property Law Spanish Data property Law Spanish Data Part	Completed
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10. Non discrimination	9	 ✓ Annual Plan of social dissemination activities. ✓ Participation in public administration programs of scientific dissemination to society. ✓ Dissemination system through social networks 	 ✓ Open policy to encourage participation of researchers at any level. ✓ Polymat weekly seminar series (Every Friday) ✓ Polymat day (Once a Year) ✓ Innovation week participation ✓ Pint Of Science Participation *These types of actions are key in the organization and will have an annual continuity. 	C&C Monitoring Team	2019	✓ Polymat weekly seminar series Program http://www.polymat.eu/uploads/plan-accion/seminariospolymat2019.pdf ✓ Polymat day Event http://www.polymat.eu/uploads/plan-accion/polymatdayagenda2019.pdf http://www.polymat.eu/en/news-event-details/112 http://www.polymat.eu/en/news-event-details/161 http://www.polymat.eu/en/news-event-details/161 http://www.polymat.eu/en/news-event-details/108 http://www.polymat.eu/en/news-event-details/138 http://www.polymat.eu/en/news-event-details/175 http://w	Completed
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	11	✓ Continuous supervision working process ✓ Management team and Group Leader role	 ✓ All the Group Leaders present their research and are evaluated annually by the Scientific Advisory Board. ✓ All researchers are evaluated by their Group Leaders through meetings and participating in the POLYMAT Seminars ✓ All researchers have a personal account in Polymat's scientific production e-tool (IFUNDANET) in order to register their scientific research (publications, books, invited lectures, patents, projects) that is evaluated by their group leaders. ✓ 2020 Specific training event for group leaders regarding management and coaching skills in order to reinforce the Group leader Role. 	C&C Monitoring Team	2020	*	Scientific Advisory Board Agendas (agendas available on request only for the assessor) Polymat seminars programme http://www.polymat.eu/uploads/plan- accion/seminariospolymat2019.pdf Polymat's scientific production e- tool (IFUNDANET) http://www.polymat.eu/uploads/plan- accion/polymatifundanet.jpg	In Progress
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II. Recruitment

Relevant Legislation / Category C&C	C&C Principles	Existing Institutional rules and/or practices	Actions implemented & required	Responsible	Implementation Due date	Indicators/evidence	Status
12. Recruitment							
	12	Findorsement of C&C (Commitment of Founding Partners) and Code of Conduct.	POLYMAT OTM-R Policy implemented. Position Call ad will be generated for each selection process. They will include all the relevant data and requirements of the post and will be posted in different links (included Euraxess) and social networks.	C&C Monitoring Team	2018	POLYMAT OTM-R Policy http://www.polymat.eu/uploads/plan- accion/Polymat-OTMR-Policy.pdf http://www.polymat.eu/uploads/plan- accion/politicaotmrpolymat.pdf ✓ Position Call fiches http://www.polymat.eu/uploads/plan- accion/phdfichetemplante.pdf http://www.polymat.eu/uploads/plan- accion/postdocfichetemplante.pdf http://ec.europa.eu/euraxess/index.cfm/jobs/index	Completed
13. Recruitment (Co	de)						





	13	✓ Recruitment process ✓ Endorsement of C&C and Code of Conduct(Com mitment of Founding Partners).	✓ POLYMAT OTM-R in place ✓ Existing database	C&C Monitoring Team	2019	✓ POLYMAT OTM-R in place http://www.polymat.eu/uploads/plan-accion/polymatotmrpolicy.pdf http://www.polymat.eu/uploads/plan-accion/politicaotmrpolymat.pdf ✓ Existing database. (Recruitment excel data distinguishing male and female candidates available on request only for the assessor).	Completed
14. Selection (Code) 15. Transparency (Code)	14	✓ Recruitment process ✓ Endorsement of C&C and Code of Conduct (Commitment of Founding Partners).	 ✓ POLYMAT OTM-R Policy in place. The selection Committees has an adequate gender balance and at least will be formed by three members. ✓ Polymat's welcome guide is sent by email to all the new foreign employees. ✓ Once the selection is over, POLYMAT will contact the candidates selected and offer feedback. 	C&C Monitoring Team	2018	 ✓ PhD Job offer fiche template http://www.polymat.eu/uploads/plan-accion/phdfichetemplante.pdf ✓ Post-doc Job offer fiche template http://www.polymat.eu/uploads/plan-accion/postdocfichetemplante.pdf ✓ Selection Committee's Template	Completed





15	✓ ✓	process	 ✓ POLYMAT OTM-R in place. The selection Committees has an adequate gender balance and at least will be formed by three members. ✓ Polymat's welcome guide is sent by email to all the new foreign employees. ✓ Once the selection is over, POLYMAT will contact the candidates selected and offer feedback. ✓ POLYMAT OTM-R policy about selection processes to be communicated publicly 	C&C Monitoring Team	2020	 ✓ PhD Job offer fiche template http://www.polymat.eu/uploads/plan-accion/postdocfichetemplante.pdf ✓ Selection Committee's Template Report http://www.polymat.eu/uploads/plan-accion/modeloinformeprocesodeseleccion.pdf ✓ POLYMAT Welcome guide http://www.polymat.eu/uploads/plan-accion/welcomeguide.pdf http://www.polymat.eu/uploads/plan-accion/polymatotmrpolicy.pdf http://www.polymat.eu/uploads/plan-accion/politicaotmrpolymat.pdf 	In Progress
16. Judging merit (Code)					,		
16	✓	process	 ✓ The selection Committee evaluates the whole range of experience of the candidates, their potential, creativity and level of independence. ✓ POLYMAT OTM-R in place. The selection Committees has an adequate gender balance and at least will be formed by three members. 	C&C Monitoring Team	2018	✓ Selection Committee's Template Report http://www.polymat.eu/uploads/plan- accion/selectioncommitteereport.pdf http://www.polymat.eu/uploads/plan- accion/polymatotmrpolicy.pdf http://www.polymat.eu/uploads/plan- accion/politicaotmrpolymat.pdf	Completed
18. Recognition of mobility ex	perience	(Code)					





	18	✓	Recruitment process Endorsement of C&C (Commitment of Founding Partners).	✓	The selection Committee evaluates the whole range of experience of the candidates, mobility experience, their potential, creativity and level of independence. POLYMAT OTM-R in place. The selection Committees has an adequate gender balance and at least will be formed by three members.	Monitoring Team	2018	✓ Selection Committee's Template Report http://www.polymat.eu/uploads/plan- accion/modeloinformeprocesodeseleccion.pdf http://www.polymat.eu/uploads/plan- accion/polymatotmrpolicy.pdf http://www.polymat.eu/uploads/plan- accion/politicaotmrpolymat.pdf	Completed
21. Postdoctoral app	pointments (Cod	de)							
	21	✓	Recruitment process Endorsement of C&C (Commitment of Founding Partners).	\[\square \tau \]	POLYMAT OTM-R in place. The selection Committees has an adequate gender balance and at least will be formed by three members. Position Call ad will be generated for each selection process. They will include all the relevant data and requirements of the post and will be posted in different links (included Euraxess) and social networks. The selection Committee evaluates the whole range of experience of the candidates, their potential, creativity and level of independence R2 Researchers have already responsibilities concerning PhD students, participation in European projectsIn any case; Improvement of their skills can be developed. 2020 Research career event to be shared with researchers regarding future career possibilities.	C&C Monitoring Team	2020	Selection Committee's Template Report http://www.polymat.eu/uploads/plan- accion/modeloinformeprocesodeseleccion.pdf http://www.polymat.eu/uploads/plan- accion/polymatotmrpolicy.pdf http://www.polymat.eu/uploads/plan- accion/politicaotmrpolymat.pdf	In progress

III. Working conditions and social security

Relevant Legislation / Category C&C	C&C Principles	Existing Institutional rules and/or practices	Actions required	Responsible	Implementation Due date	Indicators/evidence	Status
22. Recognition of the	profession						





✓ Spanish Statute of Worker's rights.	ment	✓ Endorsement of C&C (Commitment of Founding Partners). ✓ Polymat's mission, vision	unanimously agreed to approve the organisation and	C&C Monitoring Team	2017	 ✓ December 2017 approved all documents by POLYMAT'S Board (Certificates signed available on request only for the assessor). ✓ Training Sessions about HR Logo and Compliance given to all the Staff June 2018 (Registry Document signed by the Staff available on request only for the assessor). http://www.polymat.eu/uploads/plan-accion/trainingsessionsip2017.pdf ✓ An Ethical-Grievance Channel created and published on the web site (canaletico@polymat.eu) http://www.polymat.eu/en/ethical-channel ✓ In 2017, a Compliance Officer Appointed. (Certificates signed available on request only for the assessor). ✓ Compliance documents published on the intranet. http://www.polymat.eu/uploads/plan-accion/acceptableuseofitresources.pdf http://www.polymat.eu/uploads/plan-accion/codeofethics.pdf http://www.polymat.eu/uploads/plan-accion/criminalriskpreventionmanual.pdf http://www.polymat.eu/uploads/plan-accion/modelofirmacetico.pdf http://www.polymat.eu/uploads/plan-accion/modelofirmacetico.pdf http://www.polymat.eu/uploads/plan-accion/modelofirmacetico.pdf http://www.polymat.eu/uploads/plan-accion/policyforfraud,briberyandcorruption.pdf ✓ March 21st 2019 the Board of Trustees unanimously approved the New Policies of Respect for People and adherence of suppliers to the POLYMAT Compliance model (Certificates signed available on request only for the assessor). http://www.polymat.eu/uploads/plan-accion/policytonrespectforpeople.pdf 	Completed
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Statute of Worker's option due to rights. Worker's option due to child care. Worker's option due to child care. ✓ Gender Equality Committee created	Worker's rights. ✓ permission days due to child or relatives illness. ✓ Option for leave.	Team Gender Equality Committee (Minutes report available on request only for the assessor) ✓ List of conciliations measures http://www.polymat.eu/uploads/plan-	In Progress
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27. Gender balance



✓ Spanish Science Law ✓ Spanish Statute of Worker's rights. ✓ University (UPV/EHU) and Ikerbasque salary regulation	26	Internal guide on social security, health insurances and taxes.	 ✓ Funding and salaries are regulated within the POLYMAT Corporate Compliance System. National existing legislation is applied. ✓ Researchers of all career stages enjoy fair conditions of salaries with adequate and equitable social security provisions ✓ Polymat salaries are adapted to the new legislation referred to Early Stage researchers. 	C&C Monitoring Team	2019	 ✓ "National funding legislation" https://www.boe.es/buscar/pdf/2015/BOE -A-2015-11430-consolidado.pdf ✓ Researchers payslips (The payrolls are filed in our Enterprise Resource Planning (ERP)). The researchers can access to their payslips with their personal login through the ERP intranet. ✓ POLYMAT Corporate Compliance System http://www.polymat.eu/uploads/plan-accion/acceptableuseofitresources.pdf http://www.polymat.eu/uploads/plan-accion/codeofethics.pdf http://www.polymat.eu/uploads/plan-accion/criminalriskpreventionmanual.pdf http://www.polymat.eu/uploads/plan-accion/ethicschanel.pdf http://www.polymat.eu/uploads/plan-accion/modelofirmacetico.pdf http://www.polymat.eu/uploads/plan-accion/modelofirmacetico.pdf http://www.polymat.eu/uploads/plan-action/policyforfraud.briberyandcorruption.pdf http://www.polymat.eu/uploads/plan-action/policyforfraud.briberyandcorruption.pdf http://www.polymat.eu/uploads/plan-action/policyforfraud.briberyandcorruption.pdf http://www.polymat.eu/uploads/plan-action/policyforfraud.briberyandcorruption.pdf http://www.polymat.eu/uploads/plan-action/policyforfraud.briberyandcorruption.pdf http://www.polymat.eu/uploads/plan-action/policyforfraud.briberyandcorruption.pdf 	Completed
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27	 ✓ We have created "Emakiker" Grant for senior researchers ✓ We have received Mutualia Gender Equality Award for the "Emakiker" Call 2018 ✓ We participate in a platform called ACADEME to promote women leadership. ✓ A Gender Equality Committee was launched in December 2018, in order to address the Gender Equality Plan that it was planned in the POLYMAT 2018-2021 Strategic Plan. ✓ Conciliation measures analyzed ✓ 2020 Conciliations measures need to be approved and communicated to all staff ✓ At 2018 Polymat's day programme visiting female scientists was significantly increased. ✓ Selection Committees from 2019 have an adequate gender balance and at least are formed by three members. ✓ Promoted participation in an external photo contest to give visibility to women in science and technology. Women working in a scientific environment and a brief description of the technical tasks she/they usually perform. ✓ Implement a knowledge transfer methodology by establishing a senior to Junior Women Mentoring. ✓ Develop a Gender Equality Plan 	C&C Monitoring Team and Group Leaders	 ✓ "Emakiker" Grant for Women senior researchers (2018 and 2019) http://www.polymat.eu/en/news-event-details/147 http://www.polymat.eu/en/news-event-details/164 ✓ Mutualia Gender Equality Prize http://www.polymat.eu/en/news-event-details/159 ✓ Minutes of Gender Equality Committee meetings (Committee meeting minutes available on request only for the assessor) ✓ 2018 Polymat Day's Event http://www.polymat.eu/en/news-event-details/161 http://www.polymat.eu/uploads/plan-accion/polymatdayagenda2019.pdf ✓ Gender Equality Analysis and Action Plan Proposal (Erantzunkinde) (Document available on request only for the assessor) ✓ Conciliation Measures proposal http://www.polymat.eu/uploads/plan-accion/Anexo Inventario medidas BK.pdf ✓ External Company Photo Contest mailing http://www.polymat.eu/uploads/plan-accion/ftelazpi.pdf 	In Progress
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28. Career development





	28	acti Gro role dev Poly rela con pec dev E o (0	nual Training civities. oup Leaders e as people velopers. lymat's values ative to mmitment in ople velopment Endorsement of C&C (Commitment of Founding Partners).	√ √ √	Internal Training Ip Role as a leaders (May 2017) R2 Researchers have already responsibilities concerning PhD students, participation in European projectsIn any case; Improvement of their skills can be developed. 2020 Research career event to be shared with researchers regarding future career possibilities. 2020 Specific training for group leaders in order for them to acquire management and coaching skills in order to reinforce the Group leader Role.	C&C Monitoring Team	2020	•	Training Courses	In Progress
29. Value of mobility		P	aitiicis).							
	29	as a dev ✓ Stay ✓ Poly mis &va ✓ End C&G (Co Fou	oup Leader roll a career veloper. bys programs lymat's sssion, vision alues. dorsement of iC commitment of unding rtners).	✓	The Group leaders promote the M. Curie Rise participation in order to enhance mobility. Stays Programs to Deakin University (Australia) have been developed	C&C Monitoring Team	2019		International Cotutelle Thesis M. Curie Rise Agreements Deakin University Agreement Agreement with Universidad Simon Bolívar Agreement with Stellenbosch University (South Africa) Agreement with University of Beijing (China) Agreement with "Instituto de Desarrollo Tecnológico para la Industria Química (Universidad Nacional del Litoral and CONICET), Argentina greements are available on nly for the assessor).	Completed
30. Access to career a	advice									
		role deve advis ✓ Polys	up Leaders e as Career elopers and isors. ymat's mission, on &values	✓ ✓ ✓ ✓ ✓ ✓ ✓ ✓	Internal communications process for Dissemination of job opportunities is established and it is promoted through internal emails* POLYMAT also encouraged the researchers in order to participate at the REBECA mentoring program for researchers willing to explore professional alternatives with mentors working beyond academia 2020 External training on Job search and selection processes focused to enterprises 2019-2020 organize a Group at LinkedIn for POLYMAT Ex-Alumni. 2019-2021 Invite Ex-alumni to POLYMAT in order to give a presentation.	C&C Monitoring Team	2021	✓	Internal emails communicating job opportunities (example) http://www.polymat.eu/uploads/plan-accion/Mails empresas.pdf Email informing about the REBECA mentoring program http://www.polymat.eu/uploads/plan-accion/rebeca.pdf	In Progress





Spanish Intellectual property Law Spanish Data Protection Law (LOPD)	31	✓ ✓ ✓	Intellectual Property protection guideline. Contract clauses Collaboration	✓	On 21 December 2017, the Board of Trustees unanimously agreed to approve the organization and management model - criminal risk prevention manual - designed and prepared for the entity in accordance with article 31 bis, which includes the following documentation, also unanimously approved, including the necessary control measures:	C&C Monitoring Team	2018	✓	University IPR Training Courses https://www.ehu.eus/es/web/enpresa/paten teak December 2017 approved all documents by POLYMAT'S Board (Certificates signed available on request only for the assessor).	
			agreements	* * *	a/ Code of Ethics. b/ Acceptable use of IT resources policy. c/ Policy for Risk Management of Fraud, Bribery and Corruption. d/ Ethical-Grievance Channel. e/ Disciplinary regime. On March 21st 2019 the Board of Trustees unanimously approved the New Policies of Respect for People and adherence of suppliers to the POLYMAT Compliance model, also agreeing its implementation and dissemination Training in general aspects such as IPR or writing scientific articles organized by the University.			✓	Training Sessions about HR Logo and Compliance given to all the Staff June 2018 (Registry Document signed by the Staff available on request only for the assessor). http://www.polymat.eu/uploads/plan-accion/trainingsessionsip2017.pdf An Ethical-Grievance Channel created and published on the web site (canaletico@polymat.eu) http://www.polymat.eu/en/ethical-channel A Compliance Officer Appointed. (Certificates signed available on request only for the assessor). Compliance documents published on the intranet http://www.polymat.eu/uploads/plan-accion/acceptableuseofitresources.pdf http://www.polymat.eu/uploads/plan-accion/crimerskassessmentreport.pdf http://www.polymat.eu/uploads/plan-accion/criminalriskpreventionmanual.pdf http://www.polymat.eu/uploads/plan-accion/ethicschanel.pdf http://www.polymat.eu/uploads/plan-accion/modelofirmacetico.pdf http://www.polymat.eu/uploads/plan-accion/policyforfraud,briberyandcorruption.pdf http://www.polymat.eu/uploads/plan-accion/policyforfraud,briberyandcorruption.pdf http://www.polymat.eu/uploads/plan-accion/policyforfraud,briberyandcorruption.pdf http://www.polymat.eu/uploads/plan-accion/policyonrespectforpeople.pdf	Completed

33. Teaching





34. Complains/ appe	33	✓	Endorsement of C&C (Commitment of Founding Partners). Polymat's mission, vision &values	✓ ✓	More development on Scientific Internal training program opportunities Periodically POLYMAT organizes training regarding "How to make presentations" that are tested in the weekly seminars. Researchers are involved in Master Program teaching.	C&C Monitoring Team	2019	✓ Polymat weekly seminar series program http://www.polymat.eu/uploads/plan-accion/seminariospolymat2019.pdf Polymat's day program http://www.polymat.eu/uploads/plan-accion/polymatdayagenda2018.pdf Master program teaching https://www.ehu.eus/es/web/master/master-quimica-polimeros	Completed
Spanish Risk Prevention Law related to psychosocial risks	34	✓ ✓	Annual risk prevention plan External advice risk prevention specialist (IMQ). Endorsement of C&C (Commitment of Founding Partners).	\ \ \	On 21 December 2017, the Board of Trustees unanimously agreed to approve the organization and management model - criminal risk prevention manual designed and prepared for the entity in accordance with article 31 bis, which includes the following documentation, also unanimously approved, including the necessary control measures: a/ Code of Ethics. b/ Acceptable use of IT resources policy. c/ Policy for Risk Management of Fraud, Bribery and Corruption. d/ Ethical-Grievance Channel. e/ Disciplinary regime. On March 21st 2019 the Board of Trustees unanimously approved the New Policies of Respect for People and adherence of suppliers to the POLYMAT Compliance model, also agreeing its implementation and dissemination	C&C Monitoring Team	2018	✓ Grievance and Solve Conflict procedure http://www.polymat.eu/uploads/plan-accion/ethicschanel.pdf ✓ Ethical Channel created http://www.polymat.eu/en/ethical-channel ✓ New Policies of Respect for People http://www.polymat.eu/uploads/plan-accion/policyonrespectforpeople.pdf ✓ Risk Prevention Annual Plan http://www.polymat.eu/uploads/plan-accion/201904riskpreventionmemorianualberc.pdf	Completed





*	Group Leaders role as representatives of teams` needs.	✓ Formalized the internal communication process for general decisions regulated in the Corporate Compliance System documents: Ethical Code, Ethical Channel procedure.	C&C Monitoring Team	2019	✓ Charter and Code Monitoring Team (Meeting minutes are available on request only for the assessor).	In Progress
	Open door communication philosophy. Endorsement of C&C (Commitment of Founding Partners).	 ✓ 2018: C&C Monitoring Team created (R1,R2,R3 y R4 represented within the committee) ✓ 2019: Gender Equality Committee created (R1,R2,R3 y R4 represented within the committee) ✓ 2019: HR Action Plan evaluation Focus Group organized: (R1,R2,R3 y R4 represented within the committee) ✓ October 2019: Survey for Polymat researchers related to 40 C&C principles 			 ✓ Focus Group meeting minutes regarding Polymat HRS4R execution plan. (Meeting minutes are available on request only for the assessor) ✓ Survey Template for Polymat researchers related to 40 C&C principles https://docs.google.com/forms/d/e/1FAIpQLScXqSsJPggp1qxyNlNckDxlZnZNrFlaESBkAmo9Q_nwlBJ_hA/viewform?c=0&w=1 ✓ Gender Equality Committee (meeting minutes are available on request only for the assessor). 	

IV. Training

Relevant Legistation / Category C&C	C&C Principles	Existing Institutional rules and/or practices	Actions required	Responsible	Implementation Due date	Indicators/evidence	Status
37. Supervision and n	managerial du		(15 2020 a tariirin a shayild ba irrad a rough a face D2	CRC	2020	Tarining assumes and	
		✓ Group Leader role related to Project management and careers developers ✓ Polymat's mission, vision &values ✓ Endorsement of C&C (Commitment of Founding Partners).	researchers to acquire management and coaching skills. ✓ 2020 Specific training for group leaders in order for them to acquire management and coaching skills in		2020	✓ Training courses and Coaching sessions	In Progress





39. Access to research	h training and	d cont	Group Leader role related to Project management and careers developers Polymat's mission, Vision &Values Endorsement of C&C (Commitment of	\[\lambda \] \[\lambda \] \[\lambda \]	Formalize and encourage internal training programs: Participation in weekly POLYMAT Seminar series. 2020-2021 Push on Training program for transferable skills with other centers In 2020 a training should be implemented for R2 researchers to acquire management and coaching skills. 2020 Specific training for group leaders in order	C&C Monitoring Team	2020	✓ Training courses and Coaching Sessions	In Progress
		✓	Founding Partners). Annual internal training and external training activities.		for them to acquire management and coaching skills in order to reinforce the Group leader Role.				





2.4.4. Calendar of actions (Summary).

Action	Description	C&C principles related	Responsible	Starting Date	Finishing Date	Top deadline
Compliance Plan (Annexed 1)	The 2015 Spanish criminal code reform establishes the elements that the compliance plan should incorporate to serve as means of corporate defence from certain crimes that can be committed by its directors or employees. This plan includes ethical and behaviour code and procedures and protocols. It is being developed by POLYMAT, and it affects some of the principles related mainly to ethical practices, intellectual property rights, risk prevention, legal working conditions and grievance.	1,2,3,5,6,7,8,10,22, 23,31,34.	C&C Monitoring Team	May 2016	2018	
Reinforce Communication Plan on specific subjects.	Reinforce information about public engagement activities Communication process and figure for job opportunities dissemination Reinforce communication on Intellectual Property Rights, collaboration agreements and confidentiality clauses. Formalize the internal communication process for general decisions.	4,5,9,28,30,31,35.	C&C Monitoring Team	September 2016	2018	
Formalize HR specific policies	 Open policy to encourage participation on public engagement activities. Formalize mobility policies. 	9,29	C&C Monitoring Team	September 2016	2018	
Reinforce the Group Leader role on strategic aspects	Group Leader role as career developer, advisor, representative of researcher's interest towards the Manager and Centre's Director.	11,28,29,37,39	C&C Monitoring Team and Group Leaders	September 2016	2020	
Reinforce Training Plan	 External training on Job Search and selection processes. Promote more Scientific Internal training program Training program for transferable skills with other centres. "How to teach" training program. "Team management skills" for Group Leaders. "How to make presentations" and "How to teach training program" Push on Training program for transferable skills with other centres 	30,33,39	C&C Monitoring Team	September 2016	2020	
Ex Alumni Project	Oriented to careers development	30	C&C Monitoring Team	January 2017	2021	
Conflict and grievance solving	Define specific procedures for grievance and conflict resolution.	34	C&C Monitoring Team	September 2016	2018	
OTM-R Policy	Reinforce the POLYMAT OTM-R Policy Communication to all Staff POLYMAT OTM-R Policy Research Career path to be shared with researchers (Workshop)	12,13,14,15,16,18,21	C&C Monitoring Team	January 2018	2020	
Gender Equality	Conciliation measures need to be approved and communicated to all staff Develop a Gender Equality Plan Implement a knowledge transfer methodology by establishing a Senior to Junior Women Mentoring	24, 27	C&C Monitoring Team	January 2019	2020	





ANNEX 1: Compliance plan

Action	Description	Responsible	Starting Date	Finishing Date					
PHASE 1: START									
1. Board Members agreement for the implementation of a Criminal Compliance Model	Board Members meet and assess the implementation of the Criminal Compliance Model. They agree the implementation of the Model in Polymat.	MT	May 2016	October 13 th 2016					
Meeting with the management team of the company to start the implementation	The management team meets to talk about the Criminal Compliance Model and the steps to start with its implementation.	MT	June 2016	October 13 th 2016					
PHASE 2: DATA COLLECTION									
3. Meeting with group leaders to set the organization's context.	Polymat's group leaders meet to define and establish the current context of the organization.	MT	September 2016	September 2016					
4. Documental revision.	After collecting all the relevant documents for the implementation of the model, those documents are revised.	MT	October 2016	November 2016					
5. Meeting with the management team and group leaders and head of departments to fulfill crime questionnaire.	Crime questionnaire is given to Polymat's managers and group leaders in order to fulfill it.	MT	January 2017	February 2017					
6. Meeting with management team and group leaders to fulfill the questionnaire that analyzes the organization's processes.	Organization's processes are analyzed through a questionnaire given to Polymat's management team and group leaders.	MT	January 2017	February 2017					
7. Questionnaire results analysis.	The questionnaires outcomes are analyzed in order to identify criminal risks and the organization monitoring process related to each risk.	MT	March 2017	March 2017					
PHASE 3: CRIMINAL RISK IDENTIFICATION AND RISK	MAP CONFIGURATION								
7. Meetings with management team, group leaders.	 Identify criminal risks derived from the actions of the decision-makers in the organization. Identify the areas related to people with capacity to act on behalf of the organization, to assess the legal risks related to acts of overreaching of faculties. 	МТ	April 2017	April 2017					
8. Collect and analyze the information.	 Identify in detail the assessed risks, taking as frame of reference the current criminal code, where it is detailed the classification of crimes to which physical and legal people are exposed. Identify, for each crime, the criminal mode in which the risk can be manifested. Prioritize the risks identified following the criteria of seriousness and probability of occurrence. Weigh risks based on homogeneous likelihood and impact scales. 	MT	April 2017	May 2017					





	Elaboration of the proposal of Polymat's Risk Map, as a tool that allows a simple and useful visualization of the exposure to Criminal Risk.			
9. Individual work meetings with Polymat's managers to assess the Risk Map proposal.	In order to give voice to all employees at Polymat, individual meetings are arranged assessing the Risk Map proposal. All the comments are collected for a posterior analysis.	MT	June 2017	June 2017
10. Establish the conclusions of the Crime Risks identifications and Risk Map configuration in Polymat and its applicability.	Considering all the comments collected in the individual work meetings, conclusions of Crime Risks at Polymat are drawn. Thus, Polymat's Risk Map is defined and its applicability is agreed.	MT	July 2017	Ip Meeting May 19 th 2017
PHASE 4: ACTIONS BASED ON RISK MAP GAP ANALY	SIS			
11. Establish an Action Plan based on the weaknesses of the Risk Map and implement the actions.	Risk Map analysis shows the weaknesses and actions are taken to reinforce those areas. The compliance plan actions will be established and developed according to the results shown on the risk map. The starting and finishing date of each action will depend on the definition of each action itself, once they are established.	C&C MT	September 2017	December 11th 2017 Ip meeting-training June 8 th and June 22 nd to all the Staff 2018

- The Compliance plan is developed in collaboration with Sayma Consulting, one of the leading firms in providing legal and tax, auditing and consulting services. In this particular area, they are experts in Intellectual Property Law, Data Protection Law, Science Law, Worker's Rights, Risk Prevention Plans and Risk Audits.
- Polymat already works with processes and protocols established and has internal documentation developed regarding Criminal Risks, but the Compliance Audit and Plan is a must regarding the 2015 Spanish criminal code reform. This project will allow Polymat to audit and reassure the accomplishment of many of the C&C Principles (1, 2, 3, 4, 5, 6, 7, 8, 10, 11, 12, 13, 14, 15, 16, 18, 21, 22, 23, 24, 26, 31, 33, 34).