



IUSS

Scuola Universitaria Superiore Pavia

**CODE OF ETHICS AND CONDUCT OF THE
UNIVERSITY SCHOOL FOR ADVANCED STUDIES
IUSS PAVIA**

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PREAMBLE

This *Code of ethics and conduct* specifies the fundamental values of the community which makes up the University for Advanced Studies IUSS (hereinafter, the "School"), promoting, in harmony with art. 56 of its Statute, the recognition and respect of all individual rights, as well as the acceptance of duties and responsibilities towards the institution to which it belongs and defines the rules of conduct within that community (hereinafter, the "Community").

In particular, Chapter II, *Code of Ethics*, according to the provisions of art. 2, fourth section, of L. 30 December 2010, no 240, identifies the ethical principles and fundamental values of the Community, promoting the recognition and respect of individual rights and freedoms, the acceptance of ethical and social duties and responsibilities towards the School and defining the rules of conduct within the Community and towards all those who come into contact with the School, directly or indirectly.

Chapter III, *Code of Conduct*, defines the minimum duties of diligence, loyalty, impartiality and good behaviour that public employees are required to observe, implementing the provisions of the Code of Conduct for public employees issued with Presidential D. no 62 dated 16 April 2013 (hereinafter, the "Code of national conduct").

The two codes are united in a single document and coordinated with each other in the perspective of a coherent and effective integration.



CHAPTER I — GENERAL PROVISIONS

Art. 1. PRINCIPLES AND VALUES

1. In pursuing the values which underlie scientific research, teaching and other university activities, the School identifies freedom of expression and of teaching, mutual respect and tolerance in diversity as the fundamental principles of its activity.

2. The School requires all members of its Community, which occupy different positions, roles and responsibilities, both individually and in the context of collective bodies, to respect and promote the following principles:

- respect for human dignity and development of the person, both as an individual and as a member of the Community;
- rejection of all forms of discrimination, respect and recognition of differences in provenance, language, religion, political opinions, personal, social and economic conditions, sex, gender and sexual orientation;
- freedom of teaching and scientific research;
- responsibility and respect for the duties towards the Community;
- honesty, integrity and professionalism;
- diligence, loyalty, fairness and good faith;
- solidarity and support towards the weakest;
- pursuit of merit, to be pursued also through an effective evaluation system;
- respect and protection of the environment and of the healthiness of the places of life and work, both physically and psychologically;
- impartiality and sound administration, according to the principles of efficiency, effectiveness, economy and transparency;
- proportionality, objectivity, fairness and reasonableness, independence, impartiality, abstention in the event of a conflict of interest;
- link between autonomy and responsibility.

The principles listed above constitute the basis of the School's *Code of Ethics and Conduct*, whose respect is required in the same manner from all members of the Community, each with reference to their role and responsibilities.

3. The whole Community observes the Constitution, serving the nation with discipline and honour and conforming its conduct, for the part lying within their competence, to the principles of sound administration and impartiality. It carries out its duties in compliance with the law, pursuing the public interest without abusing its position or powers.



3. As part of the Community, all workers contribute to pursuing the School's objectives, complying with its Statute, within the scope of the tasks and functions conferred.

4. In particular the worker:

- carries out his/her tasks by focusing the administrative action towards maximum economy, efficiency and effectiveness. Management of public resources in order to carry out administrative activities must follow a logic of cost containment, without affecting the quality of the results;
- during relations with the recipients of the administrative action, he/she ensures full equality of treatment on equal terms, refraining, also, from arbitrary actions which may have negative effects on the recipients of the administrative action or that may involve discrimination based on gender, nationality, ethnic origin, genetic characteristics, language, religion or belief, personal or political beliefs, membership of a national minority, disability, social or health conditions, age and sexual orientation or other factors;
- demonstrates maximum availability and collaboration in relations with other public administrations, ensuring the exchange and transmission of information and data in any form, including electronic, in compliance with current legislation.

Art. 2. SCOPE

1. The provisions of Chapter II *Code of Ethics* are addressed to all those who are part of the Community in whatever capacity, including professors, researchers, technical-administrative staff, pupils, students, members of the statutory bodies, holders of research allowances, scholarships or research fellowships and all staff working in the field of teaching, research and administrative activities based on various types of contract.

2. The provisions of Chapter III *Code of Conduct*:

- a) shall apply to all administrative staff, both permanent and fixed-term employees of the School, including managers, linguistic and technological collaborators pursuant to art. 24-bis of L. 240/2010;
- b) they are applicable, as far as they are compatible, to collaborators or consultants of the School, in any capacity, as well as to collaborators of the bodies which carry out work or suppliers of goods or services for the School.
- c) constitute principles of behaviour for the remaining members of the Community, as they are compatible with the provisions of the respective regulations.
- d) do not apply to pupils and students of the School.



3. The provisions of Chapter II *Code of Ethics* also apply to the care activity carried out at the Regional Health Service facilities by:

- a) professors, researchers, assistants and administrative technicians operating under outside contract agreements;
- b) research fellows and PhD students authorised by the Health Authorities to carry out welfare and care activities;
- c) doctors undergoing Specialised Training;
- d) students of the Study Courses of the Medical and Healthcare Professions.

4. The Code of Conduct of the Health Facility in which they perform work, study, teaching and research activities, including the expected consequences in case of any violation, also applies to the subjects mentioned in the previous section, without prejudice to their legal status. These consequences cannot however exceed the limits established by the rules and agreements in place with the Regional Health Service. The School retains disciplinary power and the right to appreciate relevant conducts according to the Code of Conduct of the Health Structures also within its own set of rules.

5. Should the subjects referred to in section 3 believe they have found any discrepancy or conflict between the Code of Conduct of the Structure and that of the School and that this leads to negative consequences, they can report it to the Rector for appropriate measures.

CHAPTER II - CODE OF ETHICS

SECTION I - PRINCIPLES

Art. 3. REFUSAL OF ALL DISCRIMINATION

- 1. All members of the Community have the right to be treated with equal respect and consideration and to not be directly or indirectly discriminated against by factors such as religion, gender, sexual orientation, personal beliefs, physical appearance and colour of the skin, language, ethnic origins, nationality, personal and health conditions, pregnancy, age and the position held in the school.
- 2. The principle of non-discrimination does not prevent the possibility of adopting measures aimed at avoiding or compensating disadvantages or unfavourable conditions related to one of the factors mentioned in section 1, in order to guarantee a level playing field for all parties.



Art. 4. SEXUAL ABUSE, HARASSMENT AND ANNOYANCE

1. The School does not tolerate sexual abuse, harassment or annoyance, intended as a discriminatory conduct detrimental to the personal sense of human dignity, and ensures a prompt protection of the victims and the report of the perpetrator.
2. For the purposes of this section, sexual abuse and annoyance are intended as any request for sexual favours, or service proposals with a sexual content which is unwelcome to the recipient, as well as any attitude or verbal expression designed to humiliate, degrade, that is place somebody in a condition of psychological subordination, focusing on the personal sphere of sexuality.
3. An asymmetric position between the author of the harassment and the victim is considered an aggravating element of sexual abuse, harassment or annoyance. In particular, given the educational role of the School, sexual abuse and harassment by professors, researchers or technical-administrative staff towards pupils and students are particularly serious.

Art. 5. OTHER HARMFUL CONDUCT

1. No one may carry out discriminatory and vexatious conducts, threats, acts of moral violence and psychological persecution, or any other behaviour which could directly or indirectly compromise the health of others or the ability to carry out their study, research, teaching or work activities.
2. The School operates in order to prevent, sanction and remove said conduct.

Art. 6. FREEDOM OF RESEARCH AND TEACHING

1. The School is committed to creating an environment which promotes and translates the ideals of individual freedom and autonomy into good practices, when carrying out teaching and research activities, whilst taking into account that these activities should not conflict with the development programs decided by the School governing bodies.
2. When exercising freedom of research, all those who work within the School are required to implement honest, transparent and responsible behaviour, including through self-regulation tools aimed at illustrating the methodologies, results and the ethical impact of the research carried out to the scientific and to the whole community.



3. When exercising freedom of teaching, each professor is required to respect the individual, cultural, religious and political differences of the recipients of his/her teaching activities, stimulating discussion on topics which affect ethical and socially sensitive issues.
4. When undertaking training or research commitments with external public or private bodies, the School's governing bodies must first check the availability of the necessary human resources.
5. When exercising their freedom of research and teaching, members of the School's academic community are required to maintain an honest and responsible conduct, dedicating a sufficient amount of time to their duties and institutional commitments in order to fulfil their tasks, avoiding wrongful or unjustified absences and departures.
6. All members of the School are also required to maintain a collaborative and respectful conduct towards the academic decisions made for the effectiveness, efficiency, impartiality and transparency of the School's institutional activities.

Art. 7. PROTECTION OF THE SCHOOL'S INTERESTS

1. All members of the Community, in their external and internal relationships, must privilege the interests of the School towards all other situations which could entail a benefit or an advantage, even if only potential, for themselves or their family members. In this perspective, all members of the Community must, wherever possible, avoid all situations of conflict and must refrain from any activity which could interfere and hinder their ability to make decisions in the interest of the School in an impartial and objective manner.
2. In order to guarantee the principle of transparency and correctness, the School supervises through appropriate organisational instruments that any situation of conflict of interests is properly managed and monitored.
3. All members of the Community, without distinction or exception, are committed to observing and enforcing these principles within their functions and responsibilities. In no way may the conviction of acting for the benefit of the School justify the adoption of a behaviour in contrast with these principles.
4. All members of the Community do not use information they have available by way of their office for private purposes, they avoid situations and behaviours which could hinder the proper fulfilment of tasks or harm the interests or image of the School. "Private purposes" include all purposes other than the institutional one and relevant to the relationship with the School.



5. When any School management decision must be made, the parties involved must disclose any current or potential conflicts of interest in the manner specified in the following section. Current conflict of interest is intended as the situation in which the secondary (financial or non-financial) interest of the person (agent) tends to interfere with the primary interest of the School, towards which the former has precise duties and responsibilities. A potential conflict of interest is intended as a situation in which the secondary (financial or non-financial) interest of the agent could potentially tend to interfere with the primary interest of the School, towards which the former has precise duties and responsibilities.

6. The subjects indicated in the previous section must disclose current and potential conflicts of interest in writing, specifying their nature, terms, origin and the scope of their interest. In particular, should the conflict emerge whilst participating in a collegiate body, the conflict must be made known to the body itself. Should, on the other hand, the conflict emerge when carrying out a delegated position, assignment or function, the conflict must be disclosed:

- by professors, pupils and students to the Rector of the School;
- by the Rector to the Dean of the School;
- by the subjects referred to in Art. 2, section 2, letter *a)* and *b)* in accordance with the procedures indicated by the Art. 25.

7. Some types of relationships which can generate situations of conflict of interest are:

- "Ambiguous" relationships: the exchange of gifts, presents and other benefits, with the exception of marketing or courtesy gifts provided they are of modest value, as determined in Art. 22 below;
- Relationships with third parties: the presence of third-party interests which are directly related to achieving advantages;
- "Financial" or "property" relationships: the presence of financial relationships (e.g. receivables or payables) or of controlling or other significant shareholdings in companies or other entities;
- Controlling "contractual" relations: the control of companies or bodies deriving from contracts or from statutory clauses having as their object or effect the power to exercise management and coordination activities as well as control based on a dominant influence.
- "Family/affective" relationships: situations of marriage, cohabitation, blood relationship within the fourth degree or kinship within the second degree;
- "Professional" relationships: professional collaboration - both direct and indirect - of a private nature;
- "Future professional" relationships: the risk that during the working period, members of the Community may pre-establish advantageous working



situations for themselves in order to obtain beneficial professional appointments;

- "Extra-institutional" relationships: the risk that during the working period, members of the Community may pre-establish advantageous working situations for themselves in order to obtain office or extra-institutional roles.

8. In cases of actual or potential conflict of interest, the subjects involved must refrain from participating in processes whose purpose is to complete these operations in conflict of interest. In particular, subjects in a situation of conflict – in addition to expressly declaring their *status* – must abstain from any resolution concerning the operation for which there is a conflict, including a potential one.

9. Should the subjects indicated in the fifth section hold an interest which, assessed according to the criteria set forth in the previous sections, does not conflict with the School's interest, but which nonetheless has a relevance for the School's management choices, said subjects must notify the interest in question according to the procedures laid down in the sixth section. In this case, with reference to the governing bodies, the body itself will decide by majority concerning the necessity of its member's abstention, assessing whether the secondary interest is cohesive and consistent with the School's primary interest. On the other hand, should the relevant secondary interest emerge when carrying out a delegated position, assignment or function:

- with reference to professors, pupils and students, the Rector will decide about their obligation to abstain;
- with reference to the Rector, the Dean will decide about his/her obligation to abstain;
- the person in charge of the office they belong to will decide with reference to the subjects provided for by art. Art. 2, second section, letter *a)* and *b)*.

Art. 8. PROTECTION OF INTELLECTUAL PROPERTY AND EXPLOITATION OF RESEARCH RESULTS

1. The author of an intellectual work belonging to the School is required not to use it for private purposes and to maintain confidentiality of the results achieved until the moment of its official disclosure, without prejudice to the normal informal diffusion within the scientific community of reference.

2. The coordinators of the research activities carried out collectively undertake, in the related publications, to specifically indicate to which of the authors and collaborators the individual parts refer, and in any case to guarantee recognition to all research participants.



3. The coordinator of a research group promotes conditions enabling each participant to operate in accordance with freedom, integrity and professionalism criteria, encourages dialogue, constructive criticism, the development of ideas and personal skills, and enhances individual talents and merits independently from the professional qualifications of the participants and of their role within the School.

Art. 9. NEPOTISM AND FAVOURITISM

1. The School rejects all forms of nepotism and favouritism and requires all members of the university community to refrain from any such behaviour.
2. Nepotism occurs when a professor or a researcher or a member of the technical-administrative staff, directly or indirectly, uses his/her position or his/her authority to grant benefits, favour assumptions, appointments or calls, influences the entry or career progress inside the School for family members, including the spouse or cohabitant, relatives within the fourth degree and kinship within the second degree.
3. The prohibition of all forms of nepotism and favouritism also applies to the admission and assessment tests of students of any study level.
4. The School invites a prompt report of such behaviour to the Rector.
5. Should one of the applicants intending to join the call for applications be a relative within the 4th degree or kin within the 2nd degree of a professor, a researcher or a member of the technical-administrative staff, he/she must report this condition when enrolling for the aforementioned procedure.

Art. 10. MISUSE OF POWER

No member of the Community is allowed to use, directly or indirectly, the authority of his/her position in order to derive personal benefits or to force other members of the Community to perform or provide services which do not fall within the normal course of the activities which devolve upon them.

Art. 11. GIFTS AND BENEFITS

All members of the Community must refrain from soliciting, requesting or accepting offers of gifts or benefits which may directly or indirectly influence the performance of the activities for which they are responsible.



Art. 12. USE OF SCHOOL RESOURCES

1. All members of the Community must use the resources of the School in a responsible, diligent and transparent manner; they must justify and document all expenses if so required by Administration.
2. No member of the Community is allowed to use the School's equipment, spaces, human, material or financial resources for personal purposes or for purposes other than those pursued by the institution, and granting the use of such resources to third parties is not permitted, unless expressly authorised.

Art. 13. PROTECTION OF THE NAME AND REPUTATION OF THE SCHOOL

1. All members of the Community are required to uphold the School's name and to refrain from any behaviour which may damage its reputation, including through the disclosure of internal information.
2. It is not permitted to publicly declare or express personal positions and opinions by presenting them as official positions of the School.
3. In the absence of specific authorisation from the School, the following behaviour is not allowed:
 - a) using the name and logo of the School;
 - b) using the School's reputation associated with professional activities, jobs, tasks or other external activities, even if unpaid.

***SECTION II – MONITORING COMPLIANCE WITH THE PRINCIPLES AND SANCTIONS*****Art. 14. TRUSTED COUNSELLOR**

1. On the basis of the provisions of the European Parliament resolution A3/0043/94 approved on 11 February 1994, the position of Trusted Counsellor is established.
2. The Trusted Counsellor is appointed by the Rector every three years, with a mandate which cannot be renewed, after hearing the opinion of the Watchdog Committee for equal opportunities, among the subjects declared suitable by the Academic Senate. The requirements necessary for assessing eligibility are the possession of personal, professional skills and a well-known sense of justice, as well as to be highly competent in relation to the tasks assigned. The Academic Senate identifies the candidates for public selection on the basis of qualifications and an interview, which nobody belonging to the School or who has worked in the previous 5 years in whatever capacity, even if in a temporary position, may take part in.
3. The Trusted Counsellor:
 - a) carries out his/her listening activity in order to protect anyone claiming to be a victim of behaviour which violates the principles set out in Art. 3, Art. 4, Art. 5 by another member of the Community, or another person working for the School, and endeavours to find a friendly and shared solution to the matter, ensuring confidentiality and without activating any formal procedure for the violation of this code envisaged by Art. 16 below;
 - b) has the task of monitoring any risk situations, carrying out activities in order to identify any type of uneasiness by also organising appropriate collective and individual meetings with the various components operating within the School, ensuring anonymity;
 - c) has access to administrative documents concerning the case submitted to his/her attention, without prejudice to his/her duty to guarantee the right to privacy of the subjects involved;
4. By resolution of the Board of Directors and of the Academic Senate, the School may decide to share the functions performed by the Trusted Counsellor with other federated universities and research institutions or which operate in the city of Pavia, identifying appropriate forms of coordination and co-responsibility concerning the means required to ensure the correct performance of the service.
5. The Trusted Counsellor is assigned an indemnity established by the Board of Directors and the means necessary for the performance of his/her institutional duties are ensured.

6. Confidential information and items which the Trusted Counsellor becomes aware of when carrying out his/her duties may not be used by said Counsellor in order to lodge a formal report pursuant to Art. 16 below.
7. Any action by the Trusted Counsellor does not preclude the interested party from lodging a formal report at any time pursuant to Art. 16.
8. The Trusted Counsellor cannot be appointed to the Watchdog Committee provided for by Art. 17.
9. The Trusted Counsellor shall report annually to the Rector, on a confidential basis, concerning the activities which have been carried out.

Art. 15. CONFIDENTIAL COUNSELLORS

1. The figure of Confidential Counsellors is established.
2. The Rector appoints three confidential Counsellors among the School's professors, who may also be retired. The assignment lasts three years and can be renewed.
3. All those who, during their academic life, suffer from a situation of unease within the School or consider themselves to be victims of misconduct by another member of the School, or by any other person who works within the School, can turn to the confidential Counsellors. Without the need for any formality, Confidential Counsellors provide assistance and listen in order to help resolve the issues which have arisen.
4. Cases of conflict with colleagues, excessive work stress, unmet expectations, bullying, unjust behaviour or treatment and mismanagement of resources are among the situations which can be brought to the attention of confidential Counsellors. Particular attention will be paid to listening to pupils and students, especially as concerns issues related to their training and research activity.
5. Confidential Counsellors endeavour to facilitate clarification between the interested parties and to achieve a friendly and mutually agreed solution to the issues. All this whilst guaranteeing discretion and privacy.
6. Confidential information and items which the confidential Counsellor becomes aware of when carrying out his/her duties may not be used by said Counsellor in order to lodge a formal report pursuant to Art. 16 below.
7. In order to carry out their activity, Confidential Counsellors have access to administrative documents concerning the case submitted to their attention, without prejudice to their duty to guarantee the right to privacy of the subjects involved.



8. Confidential Counsellors are assigned an indemnity established by the Board of Directors and the means necessary for the performance of their institutional duties are ensured.

9. Any action by the Confidential Counsellor does not preclude the right of the interested party from lodging a formal report at any time pursuant to Art. 16.

10. Each Confidential Counsellor reports annually, on a confidential basis, the activities which have been carried out to the Rector in order to monitor any risk situations and to prevent possible unease.

Art. 16. REPORTS, INITIATING THE PROCEDURE, TERMS

1. Anyone with a legally relevant interest can report any facts deemed contrary to this Code to the School. The report, under penalty of inadmissibility, must:

- a) be in writing;
- b) provide the elements useful for identifying the fact and any other relevant information;
- c) bear the indication of the author of the report and the signature, hand-written or digital.

2. The report is filed and brought to the Rector's attention.

3. The Rector issues a written communication that the procedure has been initiated to the subjects involved, as soon as they are identified.

Art. 17. WATCHDOG COMMITTEE AND PRELIMINARY PHASE

1. The Rector is assisted in the preliminary phase by a Watchdog Committee composed of three Rector delegates appointed pursuant to art. 22, second section, of the Statute.

2. Once the procedure has been initiated, the Watchdog Committee carries out all preliminary investigations deemed useful, in compliance with the principle of the rights of the defence and with the rights of the interested parties.

3. In the first place, the Watchdog Committee summons the interested parties, giving reasonable notice, so that each can may provide, separately, its own version of the facts. In any case, the interested parties can submit a written memorandum. Furthermore, the Watchdog Committee has the right to call and hear, jointly or separately, each member of the community involved in the facts and anyone who may be aware of these, in respect of human dignity and privacy. Each member of the

Community is obliged to cooperate in the preliminary activity and to ensure free and timely access to all documentation deemed useful. Failure to cooperate constitutes an ethical violation.

4. The preliminary phase ends, within 90 days from filing the report, with a report which will be sent to the Rector for his/her decisions in accordance with Art. 18.

Art. 18. RECTOR'S DECISION ON THE REPORTS

1. If, during or at the end of the investigation, a case of possible disciplinary relevance should arise, the Rector transmits the documents to the competent disciplinary authority according to the specific regulation.

2. If, on the other hand, at the end of the investigation, no case of disciplinary relevance has emerged, the Rector, considering the elements indicated in the report by the Watchdog Committee:

a) should the report be manifestly unreliable and unfounded, may end the procedure with his/her own dismissal of charges; or

b) transmits the documents to the Senate with a proposal (filing or sanction) for the conclusive determination of the proceedings, within the due date set out in Art. 19 and any possible sanction, according to Art. 20.

3. After evaluating the elements referred to in the Rector's proposal and those eventually provided by the interested party, the Senate decides, within the time limit set by the Art. 19, on the facts, filing the proceedings or imposing sanctions pursuant to Art. 20.

4. If during the proceedings, the subject involved should no longer belong to the Community, after hearing the opinion of the Director General, the Senate rules that the procedure is extinguished, unless there are elements in order to end it by a filing.

5. Penalties are determined on the basis of the elements which emerged during the preliminary investigation and consistently with the principles of legality, proportionality and progressiveness.

6. In the case provided for in the first section, should the disciplinary procedure be concluded without any sanction, the infringement proceedings of the code of ethics may be continued, except in the case where the disciplinary procedure has established that the offense does not exist or that the person charged did not commit this.

7. Should the Rector be accused of a violation of the rules of this code, all functions performed by the Rector during the infringement proceedings will be carried out by the Dean.



Art. 19. DUE PROCESS

1. The procedure for ascertaining ethical violations and imposing sanctions is carried out in compliance with the principle of "due process" and with the other principles set out in Law no 241 dated 7 August 1990. The proceedings end within the peremptory term of 6 months from the date of filing the report or, if it is activated following a disciplinary procedure terminated without sanctions, from the date of filing the deed or other similar action. Suspension of the term is allowed in the cases provided for by law.

Art. 20. SANCTIONS

1. Without prejudice to the civil, penal, administrative and accounting liabilities, the sanctions for violations of this Code, to be applied according to criteria of progressiveness and proportionality, are:

- a) private reprimand;
- b) public reprimand;
- c) forfeiture and / or exclusion, for a period of up to three academic years, from bodies, commissions and other positions;
- d) exclusion, for a period of up to three academic years, from the assignment of any internal research funds or financial contributions made through the School.

2. The sanctions decided by the Academic Senate are enforced by the Rector.



**Art. 21. RELATIONS BETWEEN THE VIOLATION OF THE CODE OF ETHICS AND
DISCIPLINARY PROCEDURES**

1. Should the same behaviour involve an infringement of the provisions of this Code and of disciplinary obligations, the disciplinary procedures shall prevail over the infringement proceedings of this code, without prejudice to the provisions of Art. 18, sixth section.
2. Disciplinary procedures will be held in front of the competent disciplinary Authorities and according to the rules established by the specific regulation and differentiated according to the persons involved (teaching or research staff, technical-administrative staff or managers, pupils and students).

CHAPTER III - CODE OF CONDUCT

Art. 22. GIFTS, FEES AND OTHER BENEFITS

1. No worker must ask or solicit gifts or other benefits for him/herself or for others.
2. No worker must accept gifts or other benefits, for him/herself or for others, except for those with a modest value used occasionally within the context of normal courtesy relations and of international customs. In any case, irrespective of whether the fact constitutes an offence, the worker does not request, for him/herself or for others, gifts or other benefits, even with a modest value, as compensation for carrying out or for having carried out an act forming part of his/her office from subjects who may benefit from decisions or activities pertaining to the office, or from subjects for whom he/she is called to perform or exercise activities or powers of the office held.
3. No worker must accept, for him/herself or for others, from his/her own subordinate, directly or indirectly, gifts or other benefits except those with a modest value. No worker must offer, directly or indirectly, gifts or other benefits to his/her own manager, except for those with a modest value.
4. For the purposes of this article, gifts or other small-value benefits are those which are not, indicatively, above € 150, including in the form of a discount. This limit refers to the calendar year for all donations (gifts, economic benefits or other benefits) attributable to each worker. No worker may receive, for him/herself or for others, any gift of cash or other substitute payment means of money (purchase vouchers, top-ups, prepaid cards, telephone cards, etc.).

5. The worker informs the Anti-corruption Manager concerning the receipt of gifts and other benefits, beyond the cases permitted by this Code. The communication must be carried out promptly in writing within eight days.

6. Gifts and, where possible, other benefits received outside the permitted limits and which cannot be returned, must be handed to the School by the worker no later than eight days from receipt. In the case of books, catalogues, video material and sound recordings, these are acquired by the School Library.

7. No worker must accept collaboration assignments from private subjects who have, or who had during the two years which preceded assigning the position to said employee, a significant, not just economic, interest in the decisions or activities related to the pertinent office. For the purposes of this article:

- "Collaboration assignments" are intended as appointments of any type and for any reason (by way of example but not limited to, appointments as consultant, expert, arbitrator, auditor, attorney, etc.);
- "Private parties" are intended as all private entities, including non-profit, with the exclusion of private entities included in the List of public administrations (detailed in the consolidated income statement identified in accordance with Article 1 section 3 of Law no 196 dated 31 December 2009), of the majority shareholdings owned by a public administration, as well as the legal entities generated as part of technology transfer activities.

8. The Anti-Corruption Manager supervises the correct application of this article.

Art. 23. PARTICIPATION IN ASSOCIATIONS AND ORGANISATIONS

1. In compliance with the current regulations concerning the right of association, the worker must promptly communicate to the person in charge of his/her office his/her adherence to or membership of associations or organisations, regardless of their confidentiality or otherwise, whose areas of interests may interfere with the performance of his/her office. This section does not apply to membership of political parties or trade unions. The communication, which must contain all essential data concerning the association and the reasons for the possible interference, is made in writing within fifteen days:

a) from hiring, from the assignment of the appointment or from the transfer to another office;

b) from the adhesion and from becoming aware of the possible interference which could occur with the activities of the structure to which the worker is assigned;

Upon first-time adoption, the communication referred to in this section must be made within 60 days of the entry into force of this Code.

2. No worker forces other workers to join associations or organisations, nor does he/she exert any pressure to do so, by promising benefits or predicting career disadvantages.

Art. 24. COMMUNICATION OF FINANCIAL INTERESTS

1. Without prejudice to the transparency obligations provided for by laws or regulations, the worker must inform the person in charge of the office he/she belongs to and the Anti-corruption Manager of all direct or indirect collaboration relationships with private subjects paid in any way whatsoever which he/she has or has had during the last three years, in writing, specifying:

- a) if personally, or his/her relatives within the fourth degree or kinship within the second degree, the spouse or the cohabitant still have financial relationships with the person with whom he/she had the aforementioned collaboration relationships;
- b) if such relationships were or still are carried out with subjects who have interests in activities or decisions related to the office, limited to the practices entrusted to him/her.

The communication is made within the time schedule and in the ways referred to in the previous article. For the definition of private subjects see Art. 22.

Art. 25. OBLIGATION TO ABSTAIN: CONFLICT OF INTEREST AND SIGNIFICANT INTERESTS

1. The employee must refrain from making decisions or performing activities related to his/her duties in situations of conflict of interest, even potential, with personal interests or those of the spouse, cohabitants, relatives within the fourth degree, kinship within the second degree. The conflict may concern any kind of interest, including non-patrimonial, such as that deriving from the intention of accepting political or trade union pressure or from any hierarchical superiors. Some of the relationships which may determine a conflict are laid down in Art. 7, fifth section, above.

2. The employee must also refrain from taking part in adopting decisions or activities which may involve significant personal interests, or of his/her relatives within the fourth degree, of kinship within the second degree, of the spouse or cohabitants, or of people which he or she habitually associates with, or of subjects or organisations with which he/she or his/her spouse have pending or serious enmity or significant credit or debit relationships, or of subjects or organisations of which he/she is a guardian, trustee, proxy or agent, or associations, including non-



recognised, committees, companies or establishments of which he/she is a director or manager or executive. The employee must abstain in all other cases where there are serious reasons of expediency. All except as provided for in the fourth section.

3. The employee must communicate to the person responsible for the office he/she belongs to and to the person responsible for the prevention of corruption whenever he/she deems there is any cause to abstain. The communication must promptly be made in writing and contain all information useful to assess the relevance of the cause to abstain.

4. In the case provided for in the second section, the manager of the office he/she belongs to must decide on the abstention.

Art. 26. CORRUPTION PREVENTION

1. For the purposes of the provisions of art. 8 of the National Code of Conduct, the worker must comply with the measures required for the prevention of infringements in the administration. In particular, the worker must comply with the provisions contained in the corruption prevention plan and must report any illegal situations he/she becomes aware of to the School.

2. In order to protect personal privacy, the worker can report directly to the Anti-Corruption Manager, providing all necessary information and any relevant documentation.

3. Once the Anti-Corruption Manager has acquired the summary information:

a) should he/she deem the report deserving to be examined in detail, he/she transmits the acts to the competent disciplinary authority and to the Rector within five days and adopts all other measures required to protect the worker who made the report;

b) should he / she consider the report not deserving of further study, he / she communicates this to the worker who issued it.

Art. 27. TRANSPARENCY AND TRACEABILITY

1. The worker must organise his/her activity according to principles of transparency and must ensure maximum traceability in the decision-making processes, both for the purpose of fulfilling the regulatory obligations and for the purpose of guaranteeing the satisfaction of the end users.



2. The worker must know and comply with current legislation and the School's three-year Program of transparency and integrity.
3. The traceability of decision-making processes is ensured through adequate documentary support, which allows its replication at all times.

Art. 28. CONDUCT IN RELATIONS BETWEEN PRIVATE INDIVIDUALS

1. The worker must not improperly exploit the position he/she holds in the School, including when dealing privately with public officials in the exercise of their functions. To this end, the worker may not use the School's name, brand and logo except for activities related to the task he/she performs there.
2. In all his/her private activities, including when taking part in websites and social networks, the worker must pay special attention towards not damaging the School's image.

Art. 29. IN-SERVICE CONDUCT

1. Except for justified reasons, the worker must not delay or adopt any behaviour which would cause other workers to have to perform activities or to adopt decisions falling within his/her jurisdiction.
2. The worker must guarantee his/her effective in-service presence, pursuant to art. 55 *quinquies* L. Decree 30 September 2001 no 165, by means of a correct and diligent use of the attendance monitoring systems made available by the School.
3. The worker must use premises, furnishings, materials, IT tools, telephones made available by the School with due care and diligence and according to the envisaged procedures. The worker must use any means of transport which the School may make available, exclusively for carrying out office duties.
4. The worker who represents the School in judicial and extrajudicial disputes, including by proxy of the State Attorney, is required to comply with the relevant legislation.
5. The worker who carries out an activity which could be an intellectual work protected by copyright must promptly inform the head of the structure or the scientific manager, making available whatever may be necessary for any protection.
6. The worker who uses instruments, machines or other equipment is required to comply with the specific legislation, the instructions for use and all precautions in



order to prevent and avoid risks for his/her own health or that of third parties (Legislative Decree no 81/2008).

7. The worker who receives assets of the School or of other entities with which the School has a contract or a use agreement for service reasons is responsible for custody and protection as required by applicable laws. The worker must not transfer the aforementioned goods, even temporarily, to third parties, except in the cases provided for by law.

8. The worker must safeguard IT tools with due care and diligence, as well as the access credentials to the information systems made available by the School in order not to compromise the IT security.

Art. 30. RELATIONS WITH THE PUBLIC

1. The worker must maintain adequate behaviour and professionalism in his/her relations with the public and with users, aware of representing the School.

2. Employees liaising with the public must be recognisable by visibly displaying the badge or other identification means provided by administration, unless otherwise specified, also taking into account employee safety, he/she must work with a spirit of service, correctness, courtesy and availability and operate in the most complete and accurate manner possible when answering correspondence, telephone calls and e-mails. Should he/she not be competent based on the position held or subject, he/she must direct the person concerned to the administration's competent officer or office. The worker must respect the chronological order of all operations to be carried out and when dealing with any file, unless otherwise required or a different order of priorities established by the administration.

3. Except for the right to express evaluations and to disseminate information to protect trade union rights, the employee must abstain from public statements which are offensive to the School.

4. Only authorised persons can make public statements on behalf of the School.

5. The worker must be clear and complete in providing answers to the various requests received; if the application is formulated electronically, the worker undertakes to use the same instrument with which it was forwarded, preparing the answer within a timeframe which is appropriate to the content of the question and in any case to the standard of efficiency. Furthermore, all elements required for identifying the person responsible for the answer must always be highlighted. Should the answers not lead to activating administrative procedures, they are generally sent within thirty days of receipt of the request, except for justified reasons.



6. When carrying out his/her activities, the worker must ensure compliance with the times indicated in the charter of services and quality standards, where they exist.
7. The employee must not make commitments nor anticipate the outcome of any decisions or actions of his/her own or of others relating to the office, beyond the permitted cases. He/she provides information relating to administrative acts or operations, under way or concluded, in the cases laid down by the legal provisions and regulations on access, always informing the interested parties of the possibility of also turning to the Public Relations Office. He/she issues copies and extracts of deeds or documents according to his/her jurisdiction, in the manner established by the rules on access and by the regulations of his/her administration.
8. All employees must observe professional secrecy and comply with the legislation regarding the protection and processing of personal data and, should he/she receive a request to orally provide information, deeds, documents which are not accessible and protected by professional secrecy or by the provisions concerning personal data, he/she informs the applicant of the reasons which prevent the request from being accepted. Should he/she not be able to deal with the request, he/she must ensure that it is forwarded to the administration's competent office according to the internal provisions.

Art. 31. SPECIAL PROVISIONS FOR MANAGERS

1. Without prejudice to the application of the other provisions of the Code, the provisions of this article apply to managers, including holders of offices pursuant to article 19, section 6, of legislative decree no 165 of 2001. The manager, in particular, must observe and supervise compliance with disciplinary, transparency and anti-corruption regulations, in matters of absence and permits, incompatibility, accumulation of tasks and work assignments by employees of the structure for which they are responsible.
2. The manager, in particular, must diligently perform the functions appointed to him/her on the basis of the assignment conferred, pursue the arranged objectives and adopt an appropriate organisational behaviour in order to carry out his/her duties.
3. Furthermore, he/she must ensure a fair distribution of workloads within the structure; promote periodic meetings in order to optimise work through dialogue and discussion; monitor and remove any workload deflections due to the negligence of some employees.
4. Before taking up his/her duties, he/she must inform the School about any shareholdings and other financial interests which may place him/her in conflict of



interest with the public function he/she performs and declare if he/she has relatives within the fourth degree and kinship within the second degree, spouse or cohabitant who exercise political, professional or economic activities which would place them in frequent contact with the office he/she must manage or who are involved in decisions or activities related to the office.

5. The manager must adopt a fair and transparent behaviour and an exemplary and impartial conduct in relations with colleagues, collaborators and recipients of administrative actions. The manager also ensures that the resources assigned to his/her office are used exclusively for institutional purposes and, under no circumstances, for personal needs.

6. Within the limits of available resources, the manager handles the organisational well-being in the structure for which he/she is responsible, encouraging the establishment of cordial and respectful relations between collaborators, taking initiatives aimed at circulating information, training and updating staff, at including and enhancing gender, age and personal differences.

7. The manager must assign the cases on the basis of a fair distribution of the workload, taking into account the skills, attitudes and professionalism of the staff at his/her disposal. The manager entrusts additional tasks based on professionalism and, as far as possible, according to rotation criteria.

8. The manager must assess the personnel assigned to the structure for which he/she is responsible impartially and complying with the prescribed indications and times.

9. The manager must promptly undertake the necessary initiatives should he/she become aware of an offence, activate and conclude, if able to, the disciplinary procedure, or promptly report the offence to the disciplinary authority, providing his/her cooperation if required and promptly submitting a report to the criminal judicial authority or a report to the court of auditors according to their respective jurisdictions. Should he/she receive a report of an offence from an employee, he/she must adopt every legal precaution in order that the reporting person is protected and that his/her identity in the disciplinary procedure is not unduly disclosed, pursuant to article 54-bis of legislative decree no 165 of 2001.

10. Within the limits of his/her possibilities, the manager must prevent any untruthful news concerning the organisation, activity and public employees from spreading. He/she must promote the widespread knowledge of good practice and of good example in order to strengthen the sense of trust in the School.



1. When entering agreements, transactions and stipulating contracts on behalf of the School, as well as when fulfilling these, the worker must not resort to third party mediation, nor must he/she give or promise any benefit for the intermediary activity, nor in order to facilitate or to have facilitated the conclusion or execution of the contract. This section does not apply to cases in which the School has decided to use professional intermediation.
2. The worker must not conclude, on behalf of the School, tender, supply, service, financing or insurance contracts with companies with which he/she has private contracts or has received other benefits during the previous two years, with the exception of those concluded pursuant to Article 1342 of the Italian Civil Code. Should the School conclude tender, supply, service, financing or insurance contract with companies with which the worker already has a private agreement or has received other benefits during the previous two years, the latter must abstain from joining the decision-making processes as well as the activities concerning the execution of the contract, drawing up a written report in relation to this abstention to be kept in the office records.
3. The employee who concludes agreements or deals or stipulates private contracts, with the exception of those entered pursuant to Article 1342 of the Civil Code, with private natural or legal persons with whom he/she has concluded, in the previous two years, tender, supply, service, financing and insurance contracts on behalf of the School, must inform the office manager in writing.
4. Should the manager find him/herself in the situation referred to in sections 2 and 3, he/she must inform the General Director in writing.
5. The worker who receives, from physical or juridical persons participating in the negotiation procedures in which the School is a part, oral or written complaints regarding the work of his/her office or of that of his/her collaborators, must immediately inform his/her hierarchical or functional superior, as a rule in writing.

Art. 33. MONITORING AND TRAINING ACTIVITIES

1. Officers holding organisational positions must oversee compliance with this Code and with the National Code of Conduct. The disciplinary authority has access to every act and can acquire all relevant information concerning the field of knowledge and supervisory activities, even before any statement of objection is raised.
2. The Anti-Corruption Manager prepares information notes and memos, organises training seminars for workers and all other initiatives aimed at disseminating and implementing this Code. He/she monitors its implementation yearly.



3. In order to prevent, to counteract cases of corruption, to comply with the obligations connected with the abstention of a worker in a case of conflict of interest and, therefore, in order to ensure compliance with the principles of efficiency and effectiveness in the administrative action, the School may take initiatives to collaborate with other Public entities.

Art. 34. RESPONSIBILITY RESULTING FROM THE VIOLATION OF THE DUTIES OF THE CODE OF CONDUCT

1. Pursuant to the provisions of art. 16 of the National Code of Conduct, the violation of the obligations set forth therein, as well as those provided for by this Section and by the Three-year Corruption Prevention Plan, complements behaviour contrary to official duties and determines disciplinary responsibility, in compliance with the principle of progressiveness and proportionality of the sanctions according to the provisions of Legislative Decree 165/2001 and of the National Labour Collective Agreements where applicable.

2. Infringement of the aforementioned obligations may also give rise to a criminal, civil, administrative or accounting responsibility of the worker.

3. Without prejudice to the remaining obligations and the consequent hypotheses of disciplinary responsibility of public employees, established by law, regulation or national collective agreements.

CHAPTER IV - FINAL PROVISIONS

Art. 35. DISSEMINATION

The School undertakes to promote the widest possible dissemination of this Code through publications, communications, seminars and conferences, and any other means deemed suitable for this purpose.

Art. 36. REPEALS

This Code repeals and replaces the Code of Ethics approved by resolution of the Board of Directors on 11/07/2011 and the Code of Conduct issued by Decree no 57/2014.