



UNICAMILLUS

CODE OF ETHICS

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Code Of Ethics

1. INTRODUCTION

UniCamillus takes as inspiring principles the observation of the Law and Regulations, as well as of the internal regulations, in a framework of lawfulness, honesty, transparency, privacy and respect for the dignity of the individual, oriented towards the ethics and the prevention of behaviours that are illegal and non-responsible, also in the view of the social role of which the University is appointed.

The ethical principles stated in this Code of Ethics (from now on also referred to as “Code”) are relevant for the prevention of the offences ex Lgs. D. 231/2001 and are an essential element for the system of preventative control.

The Code of Ethics is therefore a constituent part of the Model of Organization, Management and Control adopted by UniCamillus according to the Lgs. D. 231/2001.

1.1 Objective

This Code aims to ensure that the ethical values of the University are clearly defined and constitute the basis of the University’s culture, as well as the behavioural model for all the stakeholders when performing their activities.

The Code of Ethics serves to recommend, promote or prohibit specific behaviours, beside and independently from what is provided for at the regulatory level.

1.2 Recipients

The following categories are required to abide by the Code:

- The members of the University Bodies and the management, who must conform their decisions to the Code, spread its knowledge and facilitate the sharing with third parties that operate on behalf of the University;
- The employees and the collaborators, who must conform their actions to the Code and behave in its respect, informing the Surveillance Authority of possible violations;
- The Professors, scientific directors and researchers, who must act by observing the Code of Ethics and must inform the Surveillance Authority of possible violations;
- Students and trainees, who must respect the provisions and the behavioural principles of the University Didactic Regulation and of the other regulations provided for by the current legislation;
- The suppliers of goods and services, who must be informed of the rules of conduct stated in the Code and must adhere to them for the whole duration of the contractual relationship with the University.

The subjects who are required to observe the Code are called “Recipients”.

1.3 Inspiring Principles

Saint Camillus International University of Health Sciences, from now on “UniCamillus”, is a legally recognized autonomous academic institution. The University has not profit purposes and, within its institutional aims, it pursues the achievement of its objectives through actions carried out in compliance with the laws and with the fundamental human rights, based on clear and transparent regulations and in accordance with the external environment and with the objectives of the academic community.

UniCamillus approved this Code of Ethics in order to guarantee to all the institutional stakeholders – the Community, Public Administration, European Union, Scientific and Academic Community, Students, Professors, Researchers, Personnel, Collaborators and Trainees with or without remuneration - the complete enforcement of the purposes, values and principles established in the Statute.

The adoption of this Code is the expression of a context in which the primary objective is to satisfy the needs and expectations of all the university’s stakeholders through a high level of professionalism and the prohibition of conducts that are in conflict with the law and with the values promoted by the same university. The Athenaeum, therefore, rejects and condemns all kinds of conduct opposite to, or in violation of, the existing law, either performed by the individual or by more people connected by associative links, the result of such conduct being in open contrast with the University’s interests.

The contents of the Code apply to the members of the University’s governing, advisory, disciplinary and auditory bodies, to students, professors, trainees with or without remuneration, researchers, personnel and collaborators. External parties (e.g. suppliers) must accept the principles of the Code in order to maintain contractual and/or commercial relations with the University.

This Code of Conduct establishes the policies and the integrity and transparency standards to which all the subjects referred to in the previous paragraph must adhere. There are no interests or benefits for the University that could allow for a behaviour in contrast with the principles of this Code.

Observance of the norms of the Code is an essential part of the contractual and ethical obligations with the University.

Any violation of this Code is considered, always and under any condition, opposite to the interests and values of UniCamillus.

A personal commitment is required for the respect of the laws, for the honesty and loyalty towards UniCamillus and for transparency. In the frame of the relationship established with UniCamillus, the members of governing, advisory, disciplinary and auditory bodies, the students, professors, trainees with or without remuneration, researchers, personnel and collaborators must:

- Carry out their tasks in accordance with the law, the codes of ethical professional conduct, internal and external regulations, and with the guidelines of this Code;
- always act on the basis of a personal commitment to honesty, loyalty and transparency in all kinds of job, research and study activities;
- take all the necessary precautionary measures to avoid that the University becomes involved in any illegal activity.

1.4 University's Activities

All the actions and the operations of the University must be legal and must be adequately recorded. In particular, it must be possible to verify the decision and the authorization process and the execution of such operations.

For every operation there must be an appropriate document allowing, at any moment, to carry out inspections for certifying the characteristics and the reasons of the operation itself, and to identify the people responsible for authorizing, executing, registering and checking that operation.

The preparation of all kinds of documentation, including the accounting one, must be clear and transparent. The relative data shall be reported in an accurate, objective and truthful way. Under no circumstances the pursuit of an inappropriate interest or benefit for the University can justify the counterfeiting or concealing of data or documentation.

The personnel and the subjects acting on behalf of the University must operate, also with respect to purchasing, diligently and in compliance with the principles of lawfulness, cost-effectiveness, quality and integrity.

1.5 Circulation and knowledge of the Code of Ethics

The University introduces appropriate measures in order to guarantee the knowledge of the Code of Ethics and its observance in the workplace by the members of governing, advisory, disciplinary and auditory bodies, by the students, professors, trainees with or without remuneration, researchers, personnel and collaborators, and, where applicable, by consultants and suppliers.

The University ensures to provide an adequate training and a sensibilization programme to all the employees and collaborators in relation to the contents of the Code of Ethics and to the issues pertaining to it.

1.6 Compliance with the Code of Ethics

When the instructions given by the internal hierarchical organization are in conflict with the Code, the latter prevails. The Code is openly accessible on the UniCamillus website. Acceptance of the lines of conduct established in the Code is essential for being a member of the governing, advisory, disciplinary or auditory bodies of the University, or to study at UniCamillus. Adherence to the Code is a personal and non-delegable responsibility of every person who, once informed, cannot claim, as a justification for her fault, the lack of knowledge of the Code or the fact that they might have been instructed otherwise by any hierarchical level.

It is desirable that each recipient of the Code adopts a proactive approach, avoiding passive tolerance in front of possible violations and acting by her own initiative, should she detect any deviation from the principles laid down in this Code, and that she does not adopt a passive attitude in situations hindering the recommendations outlined in the Code.

It is also expected that each employee collaborates, where necessary, in the event of internal investigations.

1.7 Enforcement and updates

The Code is a University official document, ratified by the Organizing Technical Committee, which states the rights, duties and responsibilities of the University towards its stakeholders and it can be modified and extended also on the basis of advices, recommendations and proposals that will be made by the Surveillance Authority according the Lgs. Decree n. 231/2001.

The Organizing Technical Committee is entitled of the following main duties:

- promote the knowledge and the implementation of the Code of Ethics;
- make the employees aware of the ethical issues;
- regularly revise and approve the Code;
- evaluate the application of disciplinary sanctions in case of violation of the Code of Ethics conduct guidelines, when verified by the Rector, the General Director and by the Disciplinary Committee, each one for his/her specific area of competence.

The Rector and the General Director are entitled of the following main duties:

- guarantee the respect of the principles stated in the Code of Ethics;
- design and publicize procedures that ensures the level of application of the principles stated in the Code of Ethics;
- verify the violations of the Code of Ethics conduct guidelines by the employees and the possible applicable sanctions with respect to the job contract;
- regularly report to the Organizing Technical Committee upon the activities performed and propose the appropriate reviews aimed at improving the Code of Ethics principles.

The Disciplinary Committee is entitled of the following main duties:

- ensure the respect of the principles stated in the Code of Ethics by the Professors and by the students;
- design and spread procedures that ensures the level of application of the principles stated in the Code of Ethics;
- verify the violations of the conduct guidelines of the Code of Ethic by the Professors and students and the possible applicable sanctions with respect to the job contract;
- regularly report to the Organizing Technical Committee upon the activities performed and propose the appropriate reviews aimed at improving the Code of Ethics principles.

The Surveillance Authority is entitled of the following main duties:

- verify the effectiveness and adequacy of the Code of Ethics, in order to demonstrate its relevance, in case of violations as under the Decree 231/2001;
- supervise on the behaviour of the individuals to verify its compliance with the provisions of the Code of Ethics;
- adopt any necessary measure to ensure that the Organizing Technical Committee update regularly the Code, in order for it to be valid and effective with respect to the organizational and legislative

changes;

- implement the planned supervision procedures, also via internal provisions, related to the normative and informative contents.

1.8 Violations of the Code and Sanctions

The Code gives students, Professors, trainees with or without remuneration, researchers, employees and collaborators the right to signal possible violations of this Code of Ethics. The person who report can keep the anonymity and the person indicted has the right to defend herself.

Professors and people at higher hierarchical level must not approve or tolerate violations of the Code. When they witness this type of behaviours, it is required that they inform immediately the persons in charge for this purpose.

All the interested parties, either internal or external, must inform in writing on the potential violations of the Code.

The University promotes and support the “whistleblowing” practice. For this reason, “Recipients” who come to know about any violation of the Code or of the Model of Organization, Management and Control ex Lgs. D. 231/2001 must inform without hesitation the Surveillance Authority.

The report can be handed in to the Surveillance Authority according to the ways described by the internal procedures.

The receivers of the report ensure the confidentiality of the reporter’s identity, except for the obligations provided for by the Law and the preservation of the rights of the University and of the people who were indicted mistakenly or *mala fide*.

The University commits itself to protect those who report from possible retaliations, mobbing, demotion, termination and from any other action that might be harmful for their rights.

If the violation of the principles stated in this Code by the employees represents also a disciplinary offence, a disciplinary process is started immediately, independently from a possible penal trial, where the behaviour has also the characteristics of a crime.

The disciplinary sanctions, in respect of the Statute of the University, of the CCNL and of the Worker’s Statute where applicable, may lead, considering the gravity of the infraction and in compliance with the current legislation, to a justified dismissal, suspension, interruption of attendance of the degree course and also to legal actions, if the University suffers damages as the result of behaviours contrary to the this Code.

In case of violations of the Code of Ethics by the members of the Statutory Bodies, the Surveillance Authority informs immediately the Organizing Technical Committee and the Auditor Committee, that will take the appropriate actions provided for by the current regulations, as well as immediately call the Organizing Technical Committee for the implementation of the correspondent measures.

In case of violations by the Management, the most appropriate measures will be applied, according to what is provided for by the National Collective Labour Agreement of reference.

Specific resolution clauses are provided for in the contracts of professional collaborations and supply of goods, services and work, for actions contrary to the principles of this Code.

The disciplinary sanctions will be commensurate to the seriousness of the offence made by the employee or by the collaborator, according to the provisions of the law n. 300 of May 20th 1970 and to what is established by the Collective Labour Agreement as regards the employees, to what is provided for by the law in general as regards the external collaborators.

2. GENERAL ETHICAL PRINCIPLES

2.1 Transparency and Traceability of the Decisions

Information must be accurate and decisions must meet the requirements of transparency and traceability.

Each recipient of this Code must adopt all necessary procedures to ensure the transparency of information and decisions. For operational purposes, the information is transparent when it accurately reflects the reality.

A decision is defined transparent and traceable when it meets all the following requirements:

1. It is based on a rational analysis of the risks;
2. It is possible to track its premises and developing path;
3. It has been taken with the approval of the appropriate hierarchical level.

2.2 Conflict of Interests and Loyalty Duty

Every conflict of interest must be made public.

A conflict of interest, either actual or potential, exists when a relationship between one of the recipient of this Code and a third party may result in prejudice to the interests and good name of the University, to the fairness and the neutrality, and to the transparency of decisions. Situations of potential conflict must be reported to the President of the Organizing Technical Committee in order to implement the measures necessary for guaranteeing fair and impartial criteria and actions towards those persons who are in a potential conflict of interest. In the relationship with suppliers or with a third party, everyone is required to put the University's interests before any other possible case that may bring to a personal benefit, either actual or potential, for themselves or for their relatives.

When taking a decision regarding the working, research and study activities, the following questions must be considered:

1. Does this decision adhere literally to the principles of the Code of Ethics?
2. Does this decision comply with the current laws and with the Codes of Professional Conduct?
3. Does this decision comply with the University internal rules and regulations?
4. Can this decision be considered the most appropriate?
5. Should this decision be made public, could it compromise or cause damage to the public image of the University in some way?

2.3 Protection of Information and Confidentiality

The University's information must be available only to authorized people and must be protected from inappropriate disclosure. Except for the obligation to make information and acts public as provided for by the legislations and regulations, only the people explicitly authorized by UniCamillus can have access to internal information, whether they are in a paper, magnetic, electronic or optical format. Information can be used only for the purposes and periods specified in the related authorizations. Passwords are equivalent to a signature and can be known only by their owners and cannot be disclosed to third parties.

Everyone must strive for adopting all the necessary measures to preserve the University's information in his/her possession from risk of damage or loss, and must provide for its custody during the period established by the laws and by the internal regulations.

2.4 Privacy Protection

The University guarantees that personal and sensitive data acquired for the execution of its functions are treated, communicated and divulged in accordance with the national and European laws for privacy protection. Non-compliance with the obligation of secrecy will represent a serious breach if it implies, with any means, the disclosure, or if it provides the chance of disclosure of the information related to health conditions of patients treated by University's Professors. The University adopts all the necessary measures for the storage of personal and sensitive data, in accordance with the Legislative Decree 196/03 and subsequent amendments, and with the GDPR 679/16 "European Regulations on the Protection of Personal Data".

2.5 Intellectual Property Rights and Copyright

Ownership of the intellectual property rights and of the copyright, developed in the working environment, is reserved for the University. The recipients of this Code must respect the copyright of projects, texts, systems, procedures, methodologies, studies, reports, projections or any other licensed activity.

2.6 Environmental Protection

The University acts within the current environmental laws and regulations and therefore all the employees, collaborators and students are required to abide by the prescriptions in force as regards the environment protection.

3. ETHICAL PRINCIPLES IN THE AREA OF CORPORATE GOVERNANCE

3.1 University's Bodies

The appointment of the members of the University's Bodies must take place through transparent procedures, in the respect of the rules stated in the Statute.

The University's Bodies act and decide autonomously and with awareness of the facts, pursuing the University's institutional objectives in compliance with lawfulness and honesty principles.

The decisions of the members of the University's Bodies must be autonomous, i.e. they must be based on an independent assessment and pursue the planned objectives. The judgement independence is a requirement of the decisions of the University's Bodies and, therefore, the members must guarantee the highest transparency in the execution of the operations in which they have a specific interest. In these circumstances, the laws and the internal regulations regarding the conflict of interests must be applied.

In the relationship with the Auditors' Committee, every department, function, as well as every Recipient of the University observes the Code's prescriptions, respecting his/her own institutional role.

The requests for obligations' fulfilment and documentation must be processed on time, with clear assumption of the accountability for its truthfulness, completeness and accuracy of the information provided. The requested documents and data are made available in a precise and thorough way. The information provided in this way must be accurate, complete, faithful and true, avoiding and reporting, in case they occur and with the appropriate procedures, situations of conflict of interest.

3.2 Accounting and Tax Documentation

Accounting and tax documentation must always be truthful and transparent. Budgets, reports and financial statements, tax returns must represent in a truthful and correct manner the assets and the economic and financial situation of the University.

Accounting and tax returns must be reported according to the principles of transparency, truthfulness, completeness, clarity, reliability, backtracking and must allow to draw a reliable and faithful frame of the balance sheet and of the economical and financial position of the University. They must be processed by skilled professionals, in compliance with the civil and tax code, and with the accounting principles and procedures.

Each operation and transaction must be correctly recorded, checked, authorised, verifiable, legitimate, consistent and congruous.

There must be an adequate file support for each operation to ensure, at any moment, to verify the characteristics and the reasons of the transaction and to identify who supervised, check and authorised it.

It is explicitly forbidden to the employees in charge for the accounting to register, in the reports and in the relating communications addressed to the Organizing Technical Committee and/or to third parties, false facts or to omit due information regarding the assets and the economic and financial situation of UniCamillus, in order to affect the composition of the balance sheet.

The financial resources that have been used or that will have to be used shall be always authorised, consistent, congruous, correctly registered and verifiable.

It is forbidden any action or omission that may prevent, impede or counterfeit the activities of audit or those assigned to the internal or external auditory bodies.

The Recipients who may come to know about omissions, falsifications or negligence must report the facts to the Surveillance Authority.

3.3 Prohibition of smuggling

It is forbidden to introduce in the State's territory, in breach of the provisions of the directives on customs matter as provided for in the Customs Consolidated Law (D.p.r. 43/1943), goods subjected to border duties (import and export duties, withdrawals or other charges of import or export as provided for in the EU regulations and in the related implementing rules and moreover, with regard to imported goods, monopoly rights and additional border fees and any other charge or additional consumption tax for the State).

4. ETHICAL PRINCIPLES IN THE RELATIONSHIP WITH THE EMPLOYEES

4.1 Selection and Recruitment of the Employees

The selection and recruitment of the personnel will be carried out according to the principles of equality and equal opportunities, refusing any form of favouritism, nepotism or clientelism.

The decisions related to the selection of the personnel and all the decisions regarding working relationships must be justified and supported by the competent office.

4.2 Formalization of the Work Relationship

The University promotes the maximum collaboration and transparency towards the new hires so they are fully aware of the appointment.

The University commits itself to not employ foreign citizens without a permit of stay or with one that is expired, revoked or annulled or foreigners who have not request its renewal within the legal deadlines.

The work relationship is officialised with a formal job contract, observing all the legal and contractual norms, facilitating the onboarding of the employee in the working environment and refusing any form of collaboration with persons who are incompatible on the basis of impartial criteria.

4.3 Management, Evaluation and Professional Growth of the Employees

The development, the career progression and the compensation must conform to the principles of honesty, fairness and merit. The training is provided to groups or individual employees on the basis of specific needs of professional development.

The University rejects any form of discrimination towards its workers and foster their professional and personal growth through the engagement and sharing of the objectives and by assigning them responsibilities consistent with their roles. Every worker has the right to perform activities coherent with those for which she has been employed or which she has been assigned because of her merits or professional growth. The access to the roles and appointments is determined by the competencies and capabilities; moreover, without prejudice to the overall efficiency of the work, in its organization is envisaged the flexibility that helps during the leave for maternity and childcare.

It is forbidden the mere proposal of increases in the remuneration, of other benefits or a career progression in exchange for services contrary to the law, the Codes and to the internal norms.

The University prohibits the setting of objectives calibrated for targets actually unachievable.

4.4 Protection of the Work and of the Employees

The University welcomes and promotes the concept of the work as the expression of the human dignity, instrument for the development of her personality, link for the union with other people and privileged way for the material and spiritual progress of the mankind.

The employees, also in the view of the Mission of the University, are required to perform their activities with kindness and transparency, sense of responsibility, absolute dedication and spirit of collaboration towards colleagues and third parties.

The personnel, in order to ensure high standards to those who address their requests, participates in person in the University's activities and enhances its professional growth by continuously acquiring new competencies and capabilities.

The Directors and supervisors of divisions or organizational units establish, with their collaborators, relationships based on reciprocal respect and high cooperation. Each supervisor, even in the scientific research field, support the professional development of the assigned colleagues, with particular attention to the young people, taking in consideration the inclinations of each of them in the tasks' assignments, so as to implement a real operational efficiency.

The University commits itself to guarantee the professionalism and the expertise of its employees and collaborators, who are of absolute value for its prestige and credibility.

For guaranteeing the primary importance of the people, the University does not permit any form of discrimination towards the personnel. All the University's members must be respected for their choices made with conscience and must be treated with spirit of tolerance and the same consideration and they must not be discriminated, directly or indirectly, for one or more reasons, including their faith, gender, personal beliefs, physical aspect or skin colour, language, ethnic or social origin, citizenship, personal and health conditions, pregnancy or age.

In the working environment and within the competencies and responsibilities with which they are entrusted, they employees must conform their behaviour to reciprocal loyalty, in the maximum respect of the individual dignity and moral character. Therefore, any form of threatening and teasing is banned, as these behaviours are discriminatory and detrimental of the personal sense of human dignity, included curses or derision of any faith, vulgar or disrespectful language, and the victims are guaranteed a prompt protection free from prejudices.

Furthermore, the University condemns any form of recruiting, employment, use or hiring of labour force, also through intermediaries, that puts the workers under exploitation conditions and takes advantage of their being in need. A situation of exploitation exists when one or more of the following conditions recur:

1) the repeated payment of a salary which openly differs from the National or Local Labour Agreement, established by the most representative Labour Organization at the national level, or anyway asymmetrical with respect to the quantity and quality of the work offered;

- 2) the repeated violation of the regulation regarding the working hours, the time off, the weekly pause, the compulsory leave, the vacations;
- 3) the violations of the norms regarding the safety and hygiene in the working environment;
- 4) the employees undergo demeaning working or housing conditions and surveillance methods.

In particular, the University does not tolerate abuses or teases of sexual nature, meant to be discriminatory behaviours detrimental for the personal sense of human dignity, and guarantees to the victims a prompt protection, free from prejudice. The sexual tease and abuse are intended as requests of sexual favours and/or unwanted proposals for performances of sexual content, and/or humiliating behaviours or sayings which have as object the personal sphere of sexuality addressed to a person, apart from his/her gender.

The University bans discrimination in the personnel treatment. Every person interested in the study and research activities of the University can aim for enrolling in the degree courses, PhD and research projects of UniCamillus, provided that she has the necessary requirements.

Every person can aim for being employed by UniCamillus or for being taken in consideration for a new position on the basis of the working needs, of the scientific and academic objectives and on the merit criteria, without arbitrary discriminations. All the Recipients of this Code, at any level and with any qualification, shall cooperate for maintaining an atmosphere of reciprocal respect in front of the personal differences.

4.5 Safety and Prevention in Health and Work Conditions

UniCamillus, in compliance with the normative framework and with the approaches that aim at making the working environment safe and healthy, commits itself to provide a safe and healthy working environment, through the monitoring, the management and the prevention of the risks that may be incurred in when carrying out the professional, research or study activity. UniCamillus prohibits and does not tolerate the use of alcohol or drugs, sexual harassment and any other type of discriminatory actions. Specifically, the psychological and physical wellness of the students and employees, of any level and with any qualifications, is safeguarded and fostered. As regards this aspect, UniCamillus condemns behaviours that are non-ethical, or any conduct that may cause damage to the health, once played upon students or employees. The organization of the study, research or working activities will be therefore designed to avoid situations of organizational constrictions and/or psychological violence, in compliance with the current legislation.

Each employee or collaborator will have, anyway, to comply with the laws and the standards applicable in the field of safety and environmental protection and will have to observe the University's policies.

4.6 Managers', Personnel's and Collaborators' Duties

The Director as well as all the employees must comply with the current legislation and with this Code. The Director must also monitor the adherence of the personnel and collaborators to the legislation and to the Code, and adopt the provisions and controls necessary to this purpose.

The Director actively participates in any control carried out by the administrative or judicial authorities on the University's activities.

Each employee and/or collaborator is required to know the Code of Ethics and the reference norms that govern the work, within his/her role.

Personnel and collaborators must refrain from conducts contrary to these norms, ask to their chiefs in case they need clarifications on the modalities of implementation of the norms and promptly report to them or to the Surveillance Authority any piece of news relative to possible violations or any request to act in violation of the law; it is mandatory to receive these information keeping the anonymity on the reporter's identity.

Every Chief of a division of the University has the duty to provide an example for his employees with his conduct and prevent any type of retaliation.

4.7 Abuse of Authority

No one of the members of the University's personnel can make direct or indirect use of the authority of his academic role or of his/her office in order to force other employees of the University to perform services that bring him/her personal advantages, except if it is a juridical obligation.

4.8 Privacy Protection

Any inquiry on the ideas, preferences, personal tastes, and the private life of the employees and/or collaborators in general is non envisaged.

The University commits itself to protect the personal data acquired, filed and treated in the scope of the organization's activities, in the maximum respect of the laws regarding the subject and according to the directives given by the people responsible, specifically identified.

"Personal Data" are extensively intended as all the information that must be protected by law in their treatment and distribution, included personal, sensitive and judicial data.

All the measures are adopted to prevent the risk of an unauthorized access or of a treatment illegal or non-pursuant to the objectives for which the data have been collected and subsequently identified.

In particular, the employees and collaborators who are not expressly authorized in the ways and terms provided for by the European Regulation 679/2016, cannot know, record, treat and distribute personal data of other employees, collaborators or third persons.

The treatment of personal data shall anyway be preceded, apart from the exceptions provided for by the law, by the expressed consensus of the interested person, given after a specific informative note as provided for by the EU Regulation 679/2016.

Violators will be given administrative sanctions as stated in the current legislation about the privacy topic, as well as the disciplinary sanctions stated in the National Labour Agreement.

4.9 Use of the University's Assets

Everyone must deem himself/herself responsible for the assets of the University and for their correct use.

The Recipients can use, only for needs directly connected to the performance of their task or role, the material or immaterial assets, included the resources, instruments, devices, plants of any nature, belonging to the University. Exceptions can be made only if duly authorized. It is absolutely prohibited to use the assets and resources of the University in an inappropriate way or to damage them, or to let others do the same.

The use of the University's assets must be always compliant with the laws, the Codes and the internal norms and must be implemented according to the principles of functionality and efficiency.

The record and duplication of documents in any form (audiovisual, electronic, photographic, typographical, etc..) are allowed only for the needs directly connected to the performance of the task or role assigned, and, under any circumstance, if they are not in contrast with the University's interests.

The Recipients cannot use the resources, the programmes and the informatic and network devices for aims unrelated to those of the University and contrary to the legislation and to this Code.

In any case, the respect of the University's Regulation on the use of the informatic instrument, of the e-mails, of the internet connection made available and of the telematic devices, the land line and mobile network at disposal must be guaranteed.

4.10 Use of Technological Resources

Hardware and software resources must be used exclusively for the University's activities, research, study or other aims explicitly authorized. The implementation of an unlicensed software is strictly forbidden. The Recipients of this Code cannot use technological equipment, systems and devices for other purposes than those explicitly authorized. The use of software programs not compliant with the official standards is not allowed, unless otherwise authorized in writing. It is forbidden to introduce illegal software copies in the Information Technology system of the University. Anyone who operates with technological resources must be informed about the usage restriction and will have to operate in order to not violate the User Licenses or undertake actions for which the University may be indicted. Technological resources must be used in compliance with the current laws and according to the rules on procedures and operations established by the responsible departments.

5. ETHICAL PRINCIPLES TOWARDS THIRD PARTIES

5.1 Relationship with Contractual Partners

In the event that there is a joint initiative with other parties through the signing of an agreement, all the collaborators must act upon the principles and the criteria stated in this Code and in particular they are required to:

- Establish relationships only with partners who have a good reputation, who are involved only in legal activities and whose ethics can be compared to the University's one.
- Verify that the partners operate in compliance with the Code of Ethics.

- Verify that no one of the contractual partners receive a treatment which is excessively advantageous with respect to their contribute.
- Guarantee the transparency of the agreements and avoid the underwriting of contracts or partnerships contrary to the law, false or secret.
- Maintain with the partners honest, open and collaborative relationships.
- Promptly notice to the supervisor or to the Surveillance Authority any conduct of the contractual partners that might be in contrast with the principles of the Code of Ethics.

5.2 Relationship with Consultants and Suppliers, Donations and Other Forms of Free Gifts

The choice of Suppliers and the purchase of material and immaterial goods and services must happen in the respect of the principles of transparency, competition, equality in the conditions of the offers' presenters and on the basis of objective evaluations on the professionalism, competence, accountability and overall cost-effectiveness of the Supplier, considering the nature of the good or service to be purchased.

The University adopts objective and transparent selection criteria, stated in the current legislation and in the internal procedures relative to the management of the suppliers and purchases, and it does not prevent any supplier who has the required characteristics from the opportunity to compete for being appointed of a contract.

In the choice of the Supplier, the University considers the ability to guarantee the implementation of adequate services, the ownership of means and organizational units and of the characteristic to observe the obligation of confidentiality.

Each selection procedure must be carried out in the respect of the widest competition conditions and any possible exception to this principle must be authorized and motivated, in compliance with the current legislation.

Acceptance of gifts is limited. Recipients of this Code can accept presents or other forms of free gifts only if they are of modest value and cannot be interpreted, by an impartial observer, as means to obtain benefits improperly. Anyone who receives gifts or preferential treatments, not directly attributable to normal acts of courtesy, must consult the competent bodies to receive instructions regarding the aim of said gifts. Under no circumstances can gifts in the form of money or goods easily convertible into money be accepted. Participation upon invitation to events, conferences, conventions, visits to other Universities must be authorized. Restrictions regarding receiving gifts are also extended to the relatives of the Recipients of this Code. Consultants and suppliers must be rewarded only for the services actually carried out and in a proportionate manner. Suppliers must be selected after a quali-quantitative evaluation of the offers presented. Offers and agreements with the suppliers must be traceable at all times through contracts duly signed.

5.3 Relationship with the Public Administration

The University promotes legal and honest relationships with the Public Administration and the Public Institutions, under the condition of maximum transparency, and prohibits any form of promise or offer of payments or goods to facilitate or foster any interest or advantage.

In particular, the commitment towards the Public Administration and the relationships with the officials of the public institutions are limited to the competent University's divisions and are regularly authorized in the respect of the maximum compliance with the law and regulations and must in no way compromise the integrity and reputation of the Institution.

For this purpose, the University commits itself to:

- Operate, without any sort of discrimination, through designated channels of communications with the representatives of the Public Administration at a national and international level, European and local.
- Represent the interests and standing of the University in a transparent, exact and coherent way, avoiding collusive behaviours.
- Not counterfeit, alter or omit data and/or information and not submit false declarations to the Public Administration with the aim of obtaining an illicit advantage or any other benefit for the University.
- Not offer money or gifts to executives, officials or employees of the Public Administration and of the Public Institutions, to their parents, unless they are presents or benefits of modest value that cannot be interpreted in any way as an instrument to receive illegal favours, and in any case the relative specific procedures must be observed.
- To not make payments, even indirect, and to not promise job placements, favours or other benefits to public officials and to third parties to obtain more favourable treatments or influence an official deed aimed at bringing unlawful advantages.
- Not to influence the decisions improperly when an agreement, an application or a negotiation with the Public Administration or with the Public Institutions is being discussed.
- Not use money given by the Public Administration as a contribution, subsidy, or loan for an aim different from the one for which it has been donated.
- Rigorously comply with the prescriptions of the Code and of the current legislation in the relationships with the Public Administration and with the public institutions in general, either Italian, foreign or supranational.
- Not to delegate other people who have an interest, even patrimonial or indirect, for any reason connected or related to the bodies of the Public Administration or to people who work there, to maintain the aforementioned relationships in the name of or on behalf of the University.

Anyone who come to know about requests for money or other benefits from people who are part of the bodies of the Public Administration, or know about promises or donations of money or other benefits made by University representatives in favour of the aforementioned persons, are required to inform immediately the supervisor of the process and/or the supervisor of the role, and /or the Surveillance Authority.

Free gifts, acts of courtesy and hospitality can be accepted when they are of modest value and

compliant with the current legislation, and anyway when they do not compromise the integrity and the reputation of one of the parties and cannot be interpreted by an impartial observer as directed towards the acquisition of advantaged in an illicit way. In any case, this type of expenses must be authorized and documented in an appropriate way.

5.4 Relationship with the Supervisory Authorities

The relationships between the University and the Supervisory Authorities, either national or supranational, are inspired by the principles of legality, transparency and honest collaboration.

The University, where required by the current legislations, with the support of the dedicated offices, maintains timely informative flows with the Authorities, guaranteeing the completeness and the truthfulness of the information provided.

The University fulfils the obligations provided for by the law regarding the communications towards the competent Supervisory Authorities (national or supranational), ensuring the completeness and the integrity of the communications, the impartiality of the evaluations and the timeliness in their sending.

5.5 Conflict of Interests in the Cases in which the University is appointed a Role of Public Service

In the cases in which the University is appointed of a role of public service, the obligation to execute its activities with objectivity and to ensure neutral and impartial decisions is even more urgent.

The University's personnel is required to ask for and to refuse any non-humble offer of donations and benefits that may influence, even indirectly, the execution of the academic activities.

5.6 Relationships with the Community

UniCamillus limits the participation in the politics in the name of the University and administers the relationships with the Government officials and the members of the public administration. The personnel is not entitled to publicly support, in the name of UniCamillus, political parties, nor to take part in political campaign, nor in religious, ethnic, political or international conflicts. All the personnel must observe the prescriptions given by the law and regulations that govern the relationships with the officials of the public administration.

5.7 Enforcement, Communication and Circulation of the Code

The Code entries into force from the date of its approval by the University Executive Body.

The respect of the principles and of the norms of the Code of Ethics and their consistent distribution and operational implementation in the scope of the assigned responsibilities are an essential and integral part

of the contractual obligations of every employee and collaborator. To this purpose, the Code is distributed within the Institution by delivering a copy to the Bodies and to the personnel.

The Code is made public to the supplier and consultants via a specific informative notice – with an explicit statement of acceptance of the declared principles.

A copy of the Code is published on the University institutional website and noticed among the University informative material. Further copies of this Code are available at the legal head office of the company.

The Code can be modified, integrated, updated upon approval of the Governing Body and upon opinion of the Surveillance Authority, periodically or at any time when it is necessary. Prompt notice and communications on the modifications are sent to all the Recipients.