

ETHICS CODE

FONDAZIONE REGIONALE
PER LA RICERCA BIOMEDICA

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- INTRODUCTION -

The Ethics Code (hereinafter referred to as the “Code”) is a document adopted by Fondazione Regionale per la Ricerca Biomedica (hereinafter referred to as “FRRB” or the “Foundation”) that highlights the values and the principles guiding FRRB.

I - GENERAL PROVISIONS -

1. Recipients of the Ethics Code

The rules set out in this Ethics Code apply to the Foundation's human resources, at all hierarchical levels and at all levels of functional responsibility, to collaborators (where compliance on the part of such third-party collaborators is contractually agreed) and the consultants (hereinafter referred to as "Recipients").

The recipients are therefore required to comply with the rules and regulations of conduct set out in this Code.

2. Adoption and diffusion of the Code

The Board of Directors adopts the Code, and it is responsible for any amendment in the Code. The document is published on the institutional website in order to be consulted by workers and by any person interested in it.

The Foundation will also take other measures to distribute the Ethics Code in order to make the Recipients aware of its contents.

II - BEHAVIORAL PRINCIPLES -

3. Legality

FRRB intends to base its activities in compliance with the general ethical principles set forth hereinafter.

The Foundation undertakes to carry out its activity in compliance with European Union regulations, in addition to National and International regulations, rejecting any all conduct which is contrary to law.

Members of the governing bodies, senior management and, in general, the employees, collaborators and consultants of the Foundation, within the framework of their professional activities, are required to diligently comply with regulations in force, this Ethics Code and internal regulations.

4. Honesty fair competition and transparency

The Foundation acts with fairness and in respect of fair competition and transparency in the performance of its activities with reference to all the subjects that could be bearers of interests towards them. The same values are adopted and pursued by the Recipients.

5. Diligence

Compliance with the Code is to be considered an integral part of the contractual obligations entered into by the employees and by third parties who collaborate, in any way, with the Foundation pursuant to, and as a consequence, of article 2104 of the Civil Code.

6. Safeguarding of Human Resources

FRRB considers impartiality to be a most important value in any and all of the Foundation's internal and external relations.

For this reason, the Foundation rejects and punishes all discriminations with regard to age, sex, sexual attitudes, state of health, race, nationality, political opinions and religious beliefs of all those with whom it comes into contact.

Access to positions and responsibilities is decided by taking into consideration the competencies and skills.

FRRB recognizes that equal opportunities and gender equality are integral part of all its areas of activity.

In order that its employees are able to perform their functions and in order to make sure that they are professionally qualified, FRRB, promotes the growth and development of its employees.

7. Conflict of interest

In carrying on any activity, each party involved must avoid all conflicts of interest between its personal, corporate, financial or political interests and pursuits the Foundation's interest.

Any employee who, with regard to certain evaluations or acts pertaining to their duties, enters into conflict of interest or, in a situation which is only apparently a conflict of interest, must notify the general manager who will assess the advisability of reassigning the specific task.

The same prohibition applies to members of the governing bodies, senior management, collaborators and consultants.

8. Protection of Business Property

All employees are required to work diligently in order to safeguard the Foundation' assets, through responsible conduct.

Every employee must scrupulously and parsimoniously use the assets assigned to him/her; avoid inappropriate use of the Foundation's assets and property which may cause loss or damage or a reduction in efficiency, or in any case which conflict with the Foundation's interests. Every employee is responsible for protecting the resources assigned to him/her and is under an obligation to promptly inform the appropriate function of any threats or damaging events for the Foundation.

9. Use of IT Systems

Every employee is required to scrupulously adopt the provisions of the security policies, in order not to compromise the functionality and in order to protect the information technology systems, not visit Internet sites with inappropriate or offensive contents.

10. Confidentiality of Information

FRRB's employees and collaborators do not provide information or personal data without prior specific authorization from the appropriate functions, unless in the manner provided for by applicable legislation.

The privacy of employees, collaborators consultants and partners is safeguarded by adopting standards specifying the information which the Foundation requests from same and the related procedures for processing and retaining such data.

These standards also provide for a prohibition, subject to those cases provided by law, on notifying/disseminating personal data without the prior consent of those

concerned and the standards set down rules for monitoring the regulations defending privacy by same.

11. Administrative requirements and relations with the founding Partner

Each accounting operation and/or transaction must be performed in compliance with the provisions of the law and the principles of correctness, authorization, and verification.

FRRB - in drafting the financial statements and all other communications required by law - represents the financial position in a correct, complete and truthful manner.

The Foundation asks its employees and consultants to comply with applicable laws and accounting standards.

The Foundation forbids all those who collaborate with it to carry out accounting operations that harm the Founding Member or the creditors.

Financial transactions have to reflect the requirement of traceability.

12. Measures against Laundering

Members of the Administration and Control Bodies, employees and collaborators of FRRB are required to comply with all the norms and provisions, both National and International in addition to internal procedures governing anti-money laundering.

13. Gifts, presents and benefits

FRRB only sponsors events that have a scientific, beneficial or cultural value.

The donations are exclusively awarded to recognized bodies and foundations or non-profit organizations, regularly established, in compliance with accounting, civil law and tax regulations.

It is forbidden to the Recipients of this Ethics Code to offer, request or receive gifts, fees or other benefits that are exceeding the normal business practices of courtesy.

Gifts offered, save for those of very low economic value, must be documented appropriately in order to allow checks to be carried out and in order to be authorised by the Foundation's CEO.

14. Safety and Environmental protection

The Foundation guarantees its employees and collaborators working conditions that respect individual dignity, safe and healthy workplaces, as well as compliance with environmental regulations.

The Foundation is also committed to disseminating and consolidating a safety culture by developing risk awareness and promoting responsible conduct on the part of all employees.

15. Protection of Industrial Property

FRRB requires that the Recipients of the Code comply with national, European and international standards for the protection of industrial property.

Therefore, the Foundation prohibits all detrimental behavior of rights on industrial property rights.

III - EXTERNAL RELATIONS

16. Relations with the subjects financed

The Foundation pursues its institutional purpose in compliance with applicable laws.

To this end, FRRB assigns the financial resources to the bodies that have the requisites requested in the Calls for proposals and have submitted scientific projects reviewed according to an evaluation process, objective and impartial, for the relative assignment.

The Foundation also checks the correct use of the allocated funds.

17. Relations with Suppliers and Partners

In the selection of suppliers and partners, the Foundation follows the provisions of the applicable legislation and is based on objective and impartial criteria, taking into account the ability to operate in full compliance with the legislation to protect health and safety of workers and the environment.

Suppliers are required to deliver material and services that are in line with the supply conditions required and declared.

FRRB maintains business relationships with suppliers and partners based on good faith, transparency, and respect for the values of fairness, impartiality, loyalty and equal opportunities.

Therefore, any corrupting event is prohibited.

18. Relations with the public administration

In its dealings with the public administration or with bodies performing public services or bodies of public interest, FRRB scrupulously complies with the European Community, National, International and Foundation Regulations, to the extent that they are applicable.

Relation with public administrations or with bodies performing public service activities must be based on the utmost probity, integrity, impartiality, and independence, also avoiding giving the impression of wishing to improperly influence the counterpart's decisions or seeking favorable treatment.

In compliance with the principles set out in this Code, in the Organizational Model ex Law 231/2001, and in the Triennial Corruption Prevention Plan adopted by the Foundation, the Recipients collaboration is required to prevent corruption, in accordance with the Law 190 of 2012.

19. Other External Relations

Relations with other external bodies (e.g. institutions, political parties and trade unions) must be based on the utmost rigor, transparency, and fairness.

FRRB prohibits contributions, direct or indirect, to political parties, trade unions, political exponents/candidates or to events with political aims.

IV - PENALTY PROVISIONS -

20. Breach reporting

Any violation in relation to internal rules, the general and specific principles indicated in this Ethics Code and in the Model ex Law 231/2001 adopted by the Foundation can be reported directly by the Recipients to their superiors, to the General Manager, to the Supervisory Body and to the Head of Prevention of Corruption.

22. Disciplinary measures

Failure to comply with the rules of conduct set out in the Ethics Code gives rise to the application of sanctions, according to the Disciplinary System and to the rules set out in the Law 231/2001.

Every breach of the Code must be communicated to the General Manager and to the Supervisory Body and to the Head of Prevention and Corruption.

Breach of the principles and rules of conduct provided for in the Ethics Code, on the part of Foundation employees, represents a breach of the obligations arising under the employment control pursuant to article 2104 of the Civil Code and represents an unlawful act for disciplinary purposes.

The Foundation may terminate contractual agreements with collaborators, consultants and contractual counterparts behaving not in compliance with the provisions of the Ethics Code, without prejudice to the rights to claim damages should such conduct give rise to loss or damage for the Foundation, including if such loss or damage is unconnected to termination of the contractual relationship.

V - FINAL PROVISIONS -

23. Supervision on enforcement of the code

The Supervisory Body and the FRRB Head of Prevention and Corruption are responsible for monitoring the compliance with the rules contained in the Model ex Law 231/2001 and the Triennial Corruption Prevention Plan, it is their responsibility also the correct and effective implementation of the principles set forth in the Ethics Code.