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|  | FBK Code of Conduct | Rev. 04 of Feb 7, 2025 <i>PUBLIC</i> |
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FONDAZIONE BRUNO KESSLER (FBK)

Code of Conduct

| REV AND DATE | DRAFTING | VERIFICATION | APPROVAL | CHANGES TO PREVIOUS VERSION |
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| Rev. 04 of Feb 7, 2025 | RPCT, Supervisory Body | All administration and research support organizational arms, Management and Coordination Committee, Secretary General | Resolution No. 02/25 of the Board of Directors of February 7, 2025 | Regulatory adaptation (ANAC Resolution 177/2020, Legislative Decree 36/2022), preamble and foreword added, style revision and simplification. |
| Rev. 03 of Apr. 30, 2021 | RPCT, Supervisory Body | Secretary General | Resolution No. 09/21 of the Board of Directors of April 30, 2021 | Style revision (gender-inclusive language). |
| Rev. 02 of Mar. 9, 2018 | Supervisory Body, RPCT | Secretary General | Resolution No. 03/2018 of the Board of Directors of March 9, 2018 | Ethics Rules added as annexes. |
| Rev 01 of July. 15, 2016 | Supervisory Body, Transparency Chief Officer | Secretary General | Resolution No. 07/16 of the Board of Directors of July 15, 2016 | Aligned with PAT Code of Conduct. |
| Rev. 00 of Jul. 22, 2013 | Supervisory Body | Secretary General | Resolution No. 07/13 of the Board of Directors of July 22, 2013 | Newly adopted. |

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Preamble

Fondazione Bruno Kessler – a private instrumental body of the Autonomous Province of Trento – is above all a community of researchers, technologists, doctoral students and undergraduates who, together with dedicated administrative and support staff, work on the frontier of technical-scientific knowledge and social and human sciences focusing on the domain of widespread and reliable integrative artificial intelligence (AI).

In its dimension as a scientific community, Fondazione Bruno Kessler (hereafter also “FBK” or the “Foundation”), is inspired for its activities by the principles and values recognized by the Constitution of the Italian Republic, the Charter of Fundamental Rights of the European Union and other international human rights documents and conventions, with particular reference to those based in the norms protecting and promoting knowledge, research and education.

In particular, FBK's research and study work is inspired by the principles and values of the European Charter for Researchers as well as those referred to in the various regulations it has adopted or in the agreements it has signed.

Compliance with ethical and deontological standards and principles is a guarantee for the quality of research and innovation and encourages transparent, participatory and informed dissemination of the relevant results.

In this sense, FBK is primarily and constantly committed to ensuring the integrity of its research and study work, namely, compliance with the principles, ethical and deontological values and professional standards on which the responsible and diligent conduct of those who design, carry out, fund and evaluate scientific research is based. In particular, the Foundation's research staff is required to align their research and study activities with the ethical rules promoted by the Personal Data Protection Authority.

Foreword

Always without prejudice to what is stated in the preamble, this document has been drafted having regard to FBK's institutional profiles and the legal system to which it belongs as a private instrumental body of the Autonomous Province of Trento. In this sense, reference is made to the principles defined in the Code of Conduct for employees of the Autonomous Province of Trento and its instrumental entities, to the principles defined in the ANAC Guidelines on Codes of Conduct for Public Administrations, as well as to the provisions of the General Data Protection Regulation (GDPR).

In drafting this document, account was also taken of the principles that inspire the organization of Fondazione Bruno Kessler found in the Statute, the Organization Regulations, the Provincial Collective Bargaining Agreement for Foundations Personnel, the Organization, Management and Control Model, the Three-Year Plan for the Corruption Prevention and Transparency, the Gender Equality Plan, and the Privacy Regulations.

In order to give concreteness and continuity to the principles of this document, as well as to guarantee the proper functioning, reliability and reputation of the Foundation, adequate organizational safeguards have been established and formalized such as: Supervisory Body, Head of Corruption Prevention, Transparency and Privacy, Board of Statutory Auditors, Confidential Counsellor.

Article 1. General provisions

1. The principles and contents of this Code of Conduct (hereinafter also referred to as the “Code”) constitute illustrative specifications of the obligations of diligence, loyalty, impartiality and good conduct, which qualify the proper behavior of those who in various capacities work at Fondazione Bruno Kessler. All of them are required to observe the former from the moment a

formalized relationship with the Foundation has been established.

2. In particular and with reference to art. 2104 of the Civil Code, compliance with the rules of this Code must be considered an essential part of the contractual obligations of the Foundation's employees including PAT employees seconded to the Foundation and leased employees.
3. The following provisions apply in all cases in which no rules of law or regulation are applicable or in any case for profiles not otherwise governed by laws or regulations.
4. All the staff is required to make their own contribution to the Foundation's activity in a proactive and participatory way, also through constructive suggestions aimed at improving the organization's context.
5. This document applies to all forms of work performance methods authorized by the Foundation, including remote work.

Article 2. Scope of application of the Code of Conduct

1. The contents of this Code of Conduct, insofar as they are compatible, are binding on anyone in any capacity who works in the institutional, organizational and operational context of the Foundation. Henceforth, these individuals are also referred to as **"the recipients of this Code."**
2. Express provision for the application of the Code of Conduct and a clause on termination or forfeiture of the relationship in the event of violation of the obligations arising from the Code of Conduct shall be included in contracts, appointment documents and calls.

Article 3. General principles

1. In carrying out their duties, the recipients of this Code shall ensure compliance with the Law and base their decisions and conduct in the interest of the Foundation, which has been entrusted to them, without abusing their position or powers.
2. The recipients of this Code shall respect the principles of integrity, honesty, good faith, proportionality, objectivity, non-discrimination, fairness, transparency and reasonableness and maintain a position of independence in order to avoid situations, even if only presumed, of conflict of interest.
3. The recipients of this Code shall not carry out any activity that conflicts with the correct fulfillment of their duties and shall undertake to avoid situations and behaviors that may harm the interests or image of the Foundation. Prerogatives and special powers - where conferred – shall be exercised solely for the related purposes of general interest.
4. The recipients of this Code shall not use any data and information they have in their possession by virtue of their office for private purposes.
5. The conduct of the recipients of this Code shall contribute to the creation of a respectful and inclusive work environment and foster relationships of trust and collaboration both inside and outside the Foundation.
6. The recipients of this Code shall refrain from actions that involve discrimination based on gender, nationality, ethnic origin, genetic characteristics, language, religion or belief, personal or political ideas, the fact of being a member of a national minority, disability, social or health conditions, age, sexual orientation and gender identity, or other various factors, as well as from conduct that may amount to harassment or mobbing.
7. In their relations with citizens and stakeholders, the recipients of this Code shall demonstrate the utmost helpfulness and shall not hinder the exercise of the former's rights by facilitating access to information to anyone who is entitled to it and, to the extent that this is not prohibited, providing all the background and information necessary to evaluate the Foundation's decisions

and actions.

8. Recipients of this Code shall limit third-party requirements to those that are indispensable and apply every possible simplification measure.
9. The recipients of this Code shall demonstrate the utmost helpfulness and cooperation in their relations with public administrations and network organizations by ensuring, in compliance with the regulations in force, the exchange and transmission, in any form, including through ICT technologies, of the necessary information and data.
10. The recipients of this Code shall use and guard with care the Foundation's property and shall not use for private purposes any data or information they have in their possession by virtue of their office.

Article 4. Gifts and other benefits

1. The recipients of this Code shall not ask for or solicit, for themselves or others, gifts or other benefits.
2. Recipients of this Code shall not accept, again for themselves or others, gifts or other benefits, except those of use and modest value made occasionally within the framework of courtesy relations and, where applicable, international customs.
3. Gifts and other benefits, however received outside the cases permitted by this article, by the recipient, shall be immediately made available to the Foundation for return or to be donated to institutional purposes or charity.
4. Recipients of this Code shall not accept collaboration positions from private parties who have or have had, in the previous two years, a significant economic interest in decisions or activities pertaining to the office they work for, such as, for example, from private parties requesting authorizations or concessions, subsidies, grants, financial aids, economic benefits of any kind, direct and/or indirect, particularly in the context of the awarding of works, supplies and services.
5. The heads of the organizational units, however named, are required to ensure the correct application of this article.

Article 5. Memberships of associations and organizations

1. In compliance with current regulations on the right of association, the recipients of this Code shall promptly notify their internal contact officers of their membership in associations or organizations whose interests may interfere with the purposes and activities of the Foundation, except in the case of political parties or trade unions.
2. With a view to preventing any form of conflict of interest or unfair competition, employees are also obliged to communicate any outside activity or position in compliance with the regulations in force at the Foundation. As such, membership in political, labor, volunteering, sports or cultural organizations or associations as well as participation in their activities are free and need not be disclosed to the Foundation.

Article 6. Conflict of interest and obligation to abstain

1. The recipients of this Code shall refrain from making decisions or carrying out their duties if they are in a situation of conflict of interest, including potential ones, with personal interests, those of their spouses, household members, relatives, and relatives-in-law within the second degree. Conflict may involve interests of any kind, including non-pecuniary interests, such as those arising from an intent to pander to political, union, or higher hierarchical pressures.
2. The recipients of this Code shall abstain in any other case where seriously inappropriate situations could arise by communicating in writing to their internal contact person the reasons

for abstention.

3. At recruitment, the Foundation shall take the necessary measures to prevent employees, collaborators or consultants in any capacity linked by ties of kinship or affinity up to the third degree, of marriage or cohabitation, from serving in a hierarchical or functional subordination relationship within the same organizational arm. Personnel who, as a result of the position assigned, find themselves in one of the conditions referred to in the preceding sentence, shall be assigned to another organizational arm, in a position compatible with the professional requirements possessed.

Article 7. The interests of the members of the statutory bodies

1. Members of the statutory bodies who, in a given transaction of the Foundation, have an interest of their own interest or the interest of third parties, are obliged to promptly notify the Board of Directors, without prejudice to the more general and strict compliance with the Bylaws and the relevant provisions of the Law.

Article 8. Prevention of corruption

1. This Code of Conduct constitutes one of the reference protocols for the effectiveness of the Organization, Management and Control Model (hereinafter “MOG”) and the Three-Year Plan for Corruption Prevention and Transparency (hereinafter “PTPCT”) adopted by the Foundation.
2. The recipients of this Code shall comply with the measures relating to the prevention of wrongdoing and comply with the requirements contained in the MOG and the PTPCT, actively collaborating for the prevention of corruption and any form of mismanagement. In particular, they are required to promptly communicate any potentially useful information by proceeding in the manner and in accordance with the directions provided by the Foundation. According to the provisions of the Law, and to the Three-Year Plan for Corruption Prevention and Transparency, those who actively collaborate in the prevention of corruption and any form of mismanagement are widely protected.
3. Recipients of this Code who receive notification of judicial acts that, directly or indirectly, may concern the Foundation or that are relevant to the activities they perform or have performed on behalf of and/or in the name of the Foundation, are required to immediately notify, in confidence, the Supervisory Board and the Corruption Prevention and Transparency Chief Officer.

Article 9. Transparency and traceability

1. The recipients of this Code shall ensure the fulfillment of transparency obligations in accordance with current regulatory provisions and implementation documents adopted by the Foundation and provide maximum cooperation in the processing, retrieval and transmission of data and documents subject to the obligation to publish on the institutional website.
2. The traceability of the decision-making processes adopted must, in all cases, be ensured through adequate documentary support, enabling replicability at all times.

Article 10. Conduct in social life

1. The recipients of this Code shall not exploit their position in the Foundation to obtain benefits that are not theirs. In private dealings, including *extra-work* relationships, they shall not exploit or mention or otherwise imply, on their own initiative, such a position, and shall not engage in any other behavior that may harm the image of the Foundation.

Article 11. Conduct while on duty

1. Subject to the observance of deadlines for internal procedures, employees, unless justified, shall not delay or entrust others with the completion of activities or the making of decisions within their purview.

2. The head of the relevant organizational arm, or unit entrusted with budget and/or personnel management, shall monitor that the use of leaves actually occurs for the reasons and within the limits provided by the Law and collective agreements and shall highlight any deviations; he or she shall also supervise the proper recording of work attendance through clock-in by his or her staff and shall promptly report improper practices.
3. The recipients of this Code who are required to record attendance electronically only once a day shall ensure compliance with the weekly number of hours stipulated in the individual employment contract or transformations thereof and report on the activities carried out at the times and in the ways defined by the Foundation.
4. The recipients of this Code who have been provided Foundation-owned vehicles shall use them exclusively for the performance of their official duties and shall not transport persons outside the Foundation, except with prior authorization.

Article 12. Relations with the public

1. The recipients of this Code, and in particular employees, PAT employees seconded to FBK and leased employees, shall observe official secrecy and personal data protection regulations and, if requested to provide information, documents, non-accessible documents classified as confidential or personal data, they shall inform the person making the request of the reasons preventing the request from being granted. Without prejudice to the cases of prohibition provided for by the Law, the recipients of this Code may not disclose for reasons unrelated to their relationship with the Foundation and contrary to the current regulatory provisions on transparency and access to records, any documents, including investigative documents and information, which are available to them.
2. The recipients of this Code, and in particular employees, PAT employees seconded to FBK and leased employees, shall avoid attitudes and conduct that may disrupt the necessary climate of serenity and harmony within the offices and shall refrain from behaviors or statements, including through the web, social networks, blogs, forums or other media, that may damage the image and sensitivities of other people, including through the circulation of news pertaining to their private sphere.
3. Employees, including PAT employees seconded to FBK and leased employees, shall inform their supervisors of relations with the press agencies for which they are authorized.
4. Employees, including PAT employees seconded to FBK and leased employees, shall not make commitments or promises regarding their own or others' decisions or actions pertaining to the Foundation's organizational arms, if this may generate or validate distrust in the Foundation or in its independence and impartiality. They shall provide information and facts related to administrative deeds or operations only in the cases provided for by the provisions of the Law and regulations on access and shall always inform the individuals concerned of their rights in this regard. They shall produce copies and excerpts of documents according to their competence, in the manner established by the Foundation's access rules and regulations.
5. In the drafting of written texts and in all other communications, employees, including PAT employees seconded to FBK and leased employees, shall adopt precise, clear and understandable language.

Article 13 Use of ICT

1. The recipients of this Code, and in particular employees, PAT employees seconded to FBK and leased employees, shall use the Foundation's ICT resources, systems and technologies in compliance with the prescriptions given, with particular reference to the rules set to guarantee the security of information, information systems and the protection of personal data.
2. The recipients of this Code shall use the assigned ICT equipment and services (computers, tablets, telephones and the like), software that is provided by the Foundation as well as Internet

access exclusively for the performance of their work activities, subject to the exceptions provided by the Foundation in the Privacy Regulations and the Guidelines for the Use of landline and Mobile Telephony about moderate and reasonable personal use thereof. Such use, being granted in a logic of reciprocity, shall be limited and inspired by common sense criteria without ever hindering professional use or generating costs for FBK.

3. The Foundation has the right to carry out the necessary checks and adopt all measures needed to ensure the security and protection of ICT systems, information and data, in accordance with the provisions in force.
4. The use of institutional accounts is permitted only for work or work-related purposes, without compromising the security and reputation of the Foundation in any way.
5. The recipients of this Code are responsible for the content of messages sent. Only the institutional mailbox assigned by the Foundation shall be used for institutional communications, unless justified. The recipients of this Code shall comply with the methods of signing service e-mail messages identified by the organizational arm for which they work. Each outgoing message must allow the identification of the sender and must indicate an institutional address at which the sender can be reached. When using shared institutional e-mails (mail aliases), the sender shall normally indicate his or her name to allow for proper identification.
6. Sending e-mail messages, inside or outside the Foundation, that are outrageous, discriminatory, or that may in any sense be a source of liability for the Foundation is prohibited.

Article 14. Use of media and social media

1. When using their social media accounts, the recipients of this Code shall take the utmost care to ensure that their opinions or judgments about events, things or people, are in no way directly attributable to the Foundation.
2. Without prejudice to the constitutional principles set up to protect freedom of expression, union rights and citizenship, the recipients of this Code are required to refrain from any intervention, comment or statement, including through online communication tools (such as the web, social media, blogs or forums) - even if open to a limited number of users - that may harm the Foundation's prestige, decorum or reputation.
3. The recipients of this Code are prohibited from publishing, by any means, images portraying colleagues, collaborators or users unless they have been authorized in advance in writing by each person concerned.
4. The Foundation has adopted a "Social media policy," which identifies conduct that is relevant from a disciplinary standpoint.
5. When using institutional accounts for purposes of editing or modifying text and multimedia content on institutional websites, the recipients of this Code shall not post content that could compromise the security and reputation of the Foundation.
6. The recipients of this Code must responsibly use and securely manage accounts and passwords of websites related to Foundation projects, events, and organizations, periodically making sure that they have taken all necessary precautions and actions.

Article 15. Special provisions for heads of organizational arms and sub-arms however named

1. Without prejudice to the application of the remaining provisions of the Code of Conduct, the rules of this article apply to the heads of organizational arms and sub-arms, however named.
2. The individuals identified in Paragraph 1 shall diligently perform the functions incumbent upon them under the deed of conferral of office, pursue the objectives assigned to them and adopt appropriate organizational conduct.
3. The individuals identified in Paragraph 1, before assuming their duties and whenever they are requested to do so, shall disclose to the Foundation any shareholdings and other financial interests that may cause a conflict of interest with the function they are in charge of and shall

also declare whether they have relatives and relatives-in-law within the second degree, spouse or cohabiting partner who engage in political, professional or economic activities that place them in frequent contact with the organizational arm they are to direct or who are involved in the decisions or activities inherent to the office. Individuals in charge of an arm and other individuals with power of attorney to represent them shall provide the information required by the Law on their asset situation.

4. The individuals identified in Paragraph 1 shall assume loyal and transparent attitudes and adopt exemplary conduct in terms of impartiality, integrity, good faith, honesty, equal treatment, fairness, inclusiveness and reasonableness, in their relations with colleagues, collaborators and the recipients of their provisions. They shall also take care that the resources assigned to their organizational arm or sub-arm are used for institutional purposes only and, in no case, for personal needs.
5. The individuals identified in paragraph 1 shall take care of the professional growth of the human resources entrusted to them, fostering opportunities for training and continuing education, promoting development opportunities within and outside the organizational arm or sub-arm for which they are responsible.
6. The individuals identified in Paragraph 1 shall, subject to available resources, take care of organizational well-being in the organizational arm or sub-arm to which they are assigned, fostering the establishment of cordial and respectful relations among human resources, as well as internal and external relations based on loyal cooperation and mutual trust, and taking initiatives aimed at the circulation of information, staff training and continuing education, and the inclusion and enhancement of differences in gender, age and personal conditions.
7. The individuals identified in Paragraph 1 shall assign activities on the basis of an equitable distribution of the workload, taking into account the abilities, aptitudes and professional skills of their staff. They shall assign additional tasks on the basis of professional skills and, as far as possible, according to rotation criteria.
8. The individuals identified in paragraph 1 shall evaluate the assigned staff impartially and in compliance with the prescribed directions and timeframes, measuring the achievement of expected results and organizational behavior.
9. The individuals identified in paragraph 1 shall provide those who carry out the evaluation function with all the information necessary for the full and effective exercise of that function.
10. The individuals identified in paragraph 1 who become aware of an offence shall promptly take the necessary steps. In particular, they shall activate the disciplinary procedure, namely, they shall promptly report the wrongdoing to the Supervisory Body and/or to the Head of Corruption Prevention and Transparency, offering where requested their cooperation in the timely reporting to the criminal judicial authorities or in reporting to the Court of Auditors based on their respective competence. In the event that they receive a report of wrongdoing from employees, they shall take every precaution under the Law so that the person reporting the wrongdoing be protected and his or her identity be not unduly revealed in the disciplinary procedure, pursuant to Article 12 of Legislative Decree no. 24/2023 and in compliance with the provisions issued by the Foundation.
11. The individuals identified in Paragraph 1 shall observe and supervise compliance with the rules on incompatibility, employment commitment and appointments by their staff, in order to avoid impermissible practices of “dual work.”
12. The individuals identified in Paragraph 1, within the limits of their possibilities, shall avoid undue dissemination of untrue information about the organization, its activities and staff. They shall make sure that good practices and good examples are known in order to strengthen the sense of trust in the Foundation.
13. For the purposes of the application of this Code of Conduct, the individuals identified in paragraph 1 shall make the communications stipulated therein to the Supervisory Body and/or

to the Head of Corruption Prevention and Transparency.

Article 16. Contracts

1. In concluding agreements and entering into contracts on behalf of the Foundation, as well as in the execution thereof, the Foundation's staff, including PAT employees seconded to FBK and leased employees, shall not resort to mediation by third parties nor shall they pay or promise to any person any benefit by way for intermediation or for facilitating or having facilitated the conclusion or execution of the contract. This paragraph does not apply to cases in which the Foundation has decided to use professional brokering.
2. The Foundation's staff, including PAT employees seconded to FBK and leased employees, shall not conclude, on behalf of the Foundation, any bidding, supply, service, funding or insurance contracts with companies with which they have entered into private contracts or received other benefits in the previous three years, except for those concluded pursuant to Article 1342 of the Civil Code. In the event that the Foundation enters into contracts for works, supply or services, financing or insurance with enterprises with which the above-mentioned staff have concluded contracts in a private capacity or from which they have received other benefits in the previous two-year period, the Foundation's staff, including PAT employees seconded to FBK and leased employees, shall refrain from participating in decision-making and activities related to the execution of the contract, and shall inform the Foundation thereof.
3. The Foundation's staff, including PAT employees seconded to FBK and leased employees, who conclude agreements or enter into contracts in a private capacity, with the exception of those concluded pursuant to Article 1342 of the Civil Code, with private natural or legal persons with whom they have concluded, in the previous two-year period, contracts for procurement, supply, service, financing, and insurance on behalf of the Foundation, shall inform their Supervisor in writing.
4. The Foundation's staff, including PAT employees seconded to FBK and leased employees, who receive, from individuals or legal entities participating in negotiation procedures in which the Foundation is a party, oral or written grievances about the actions of their organizational arm, shall immediately inform officers in charge thereof.

Article 17. Relations with the Public Administration

1. In its relations with the public administration and public employees, the Foundation pays special attention to every deed, behavior or agreement so that they fully meet transparency, fairness and legality criteria. To this end, it avoids entrusting the entire process to a single individual, on the assumption that the plurality of subjects and functions allows for minimizing the risk of improper interpersonal relationships. Moreover, as far as possible, in relationships of an inspectional and authorizing nature, the Foundation favors plurality of contacts, again on the assumption that this allows for minimizing the aforementioned risk.
2. When negotiating or otherwise dealing with the Public Administration, employees shall refrain from conduct that may unduly influence the decision of the counterparty. In particular, it is not permitted to examine or propose employment and/or business opportunities that could personally benefit Public Administration employees; solicit or obtain confidential information that could personally compromise Public Administration employees; solicit or obtain confidential information that could compromise the integrity or reputation of both parties.
3. If the Foundation uses external consultants to be represented or receive technical-administrative assistance in its dealings with the public administration, the same directives that apply to the Foundation's employees and their staff shall apply to such individuals and their staff.
4. It is expressly prohibited to allocate disbursements, contributions, funding, allowances received from national, EU or non-EU public bodies for purposes other than those for which they are intended.

Article 18. Relations with supplier entities

1. Relations with the Foundation's suppliers, including relationships of a financial and advisory nature, are subject to the principles contained in this Code of Conduct and are subject to constant and careful monitoring by the Foundation itself.
2. The Foundation selects its suppliers by applying the laws on public contracts and all relevant regulations in force, ensuring that they operate in accordance with the rules set forth in this Code.
3. In particular, economic operators supplying machinery and equipment shall also be selected on the basis of supply compliance with the regulations on hygiene and safety at work.
4. Supplies for personal protective equipment and, in any case, for general safety and prevention devices shall comply with the obligations regarding general and specific certification and suitability, based on the intended use.

Article 19. Relations with the mass media

1. All contacts with the mass media shall be maintained exclusively by the administrative functions expressly assigned or entrusted to them. Relations with the mass media shall be marked by respect for the right to information. Information to the mass media shall be accurate, coordinated and consistent with the principles and policies of the Foundation; it shall comply with the Laws and the rules of good professional conduct; it shall be carried out with clarity and transparency. The dissemination of false news is prohibited.

Article 20. Relationships with customers

1. The Foundation is primarily engaged in research activities. However, it may also find itself engaged in commerce activities. In this case, the Foundation will orient its activities to the satisfaction and protection of its customers, paying attention to requests that may promote an improvement in the quality of products and services.
2. The Foundation will conduct business negotiations with fairness and clarity, and will fulfill its obligations with the utmost diligence. Appropriate conditions should be applied for each type of customer, establishing the same treatment for customers in the same condition and in any case in accordance with typical market practices in the sector. Any action aimed at altering the conditions of fair commercial competition is contrary to the Foundation's policy and is prohibited for all individuals acting on behalf thereof.
3. Under no circumstances may the pursuit of the Foundation's interest justify conduct that does not comply with applicable laws nor conform to the rules of this Code.

Article 21. Health and safety

1. The Foundation is obliged to carry out its activities in compliance with standards on occupational health and safety and environmental protection. It is also obliged to ensure the physical and moral integrity of its employees and collaborators, as well as working conditions that respect individual dignity and safe and healthy working environments, in full compliance with current legislation on the prevention of accidents at work and the protection of workers.
2. The Foundation plans prevention by giving priority to collective protection measures over individual protection measures and aiming for a coherent whole that integrates in itself technology, organization, working conditions, social relations and the influence of working environment related factors.
3. The Foundation is committed to spreading and consolidating among employees and collaborators a culture of safety, developing awareness of risks and promoting responsible behavior on the part of the community.
4. The recipients of this Code shall contribute to the process of risk prevention and protection of their own, colleagues' and third parties' health and safety

5. The recipients of this Code shall also maintain a climate of mutual respect for each other's dignity, honor and reputation.
6. Within the scope of the activities that take place at or for the Foundation, there is a general prohibition of heavy use of alcoholic beverages, a prohibition of the use of narcotics, and a prohibition of smoking in indoor areas or in any circumstance in which smoking may result in danger to the facilities and property of the Foundation or to the health or safety of colleagues and other individuals.

Article 22. Environmental Protection

1. The environment is a primary asset of the community that the Foundation wishes to help safeguard. To this end, the Foundation plans its activities by seeking a balance between economic initiatives and environmental needs, in compliance with the applicable provisions of the Law and regulations, ensuring the utmost cooperation to the public authorities in charge of the verification, surveillance and environmental protection.
2. The recipients of this Code contribute to the process of environmental protection. In particular, those involved in at-risk processes shall pay the utmost attention to avoid any illegal disposal and emission of harmful materials and shall manage waste or processing residues following the specific requirements of the Law.

Article 23. Principles of conduct with subsidiary, networked, affiliated entities

1. The relations between the Foundation and subsidiary and/or networked and/or affiliated entities are inspired by the principles of transparency and fairness and by the ethical values expressed in this Code of Conduct.

Article 24. Oversight, monitoring and training activities

1. The heads of organizational arms and sub-arms, in cooperation with the Supervisory Body and the Head of Corruption Prevention and Transparency, supervise the application of this Code of Conduct.
2. For the purpose of the supervisory and monitoring activities provided for in this article, the Foundation shall make use of the organizational arm in charge of disciplinary matters.
3. The Head of Corruption Prevention and Transparency and the Supervisory Body shall take care of publicizing the Code of Conduct within the Foundation as well as of the annual monitoring of its implementation.
4. The recipients of this Code shall be provided with information and training activities on transparency, integrity and public ethics, enabling them to achieve full knowledge of the contents of the Code of Conduct, as well as periodic refreshers on the measures and provisions applicable in these areas.

Article 25. Disclosures of violation of the Code of Conduct

1. Conduct that is not in line with the provisions of this Code of Conduct may be reported, including anonymously and through the appropriate confidential channels provided by the Foundation, to the Supervisory Body and/or the Head of Corruption Prevention and Transparency, while conduct that is not in line with the stated principles of equality of opportunity and non-discrimination, as well as of inclusion and respect for diversity or conduct that can be construed as harassment or mobbing should instead be addressed to the Confidential Counsellor.
2. The Supervisory Body, the Head of Corruption Prevention and Transparency or the Confidential Counsellor shall, to the extent of their competence, investigate the disclosure in the manner and within the time frame defined and formalized in the internal regulatory documents in existence at the Foundation, or - for requests addressed to the Confidential Counsellor - in a reasonably short time in relation to the sensitivity of the subject addressed.

3. Anyone who reports conduct that is not in line with this Code of Conduct or with the provisions of the Three-Year Plan for Corruption Prevention and Transparency is protected in accordance with the law.

Article 26. Liability resulting from violation of the obligations set forth in the Code of Conduct

1. The violation of the obligations set forth in the Code of Conduct constitutes conduct contrary to official duties. Except in cases of criminal, civil, administrative or accounting liability of employees, violations of this Code of Conduct, the provisions of the Three-Year Plan for Corruption Prevention and Transparency, the Organization, Management and Control Model, regulations, guidelines, procedures and further documents published on the “Transparent Administration” page of FBK's website is a source of disciplinary liability ascertained at the outcome of the disciplinary procedure, in accordance with the principles of gradualness and proportionality of sanctions.
2. The violation of the provisions of this Code of Conduct constitutes breach of contract and, in the case of employees, also a disciplinary violation, resulting in the application of sanctions and the provisions set forth in the applicable collective bargaining agreement, as well as compensation for any damages to the Foundation resulting from such conduct. Failure on the part of employees to comply with the provisions contained in this Code of Conduct may result in the application of disciplinary measures in accordance with the provisions of both the Law and the disciplinary section provided for in the collective contracts in force at the Foundation.
3. For the purpose of determining the type and extent of the disciplinary sanction concretely applicable, the violation is examined in each individual case based on the seriousness of the conduct and the extent of the harm, including moral harm, resulting from it to the decorum or prestige of the Foundation.
4. This is without prejudice to the imposition of dismissal for cases already provided for by the Law, regulations and collective agreements.

Article 27. Publicity and entry into force

1. The Foundation provides information about this Code of Conduct by publishing it on its institutional website as well as communicating its adoption to its employees, including PAT employees seconded to FBK and leased employees. The Foundation also ensures that it is communicated to those who are concerned in different ways: doctoral students, visiting scholars, holders of consultancy or collaboration contracts, holders of positions in bodies collaborating directly with the Board of Directors, as well as staff collaborating in any capacity, including professional collaborators, of companies providing services for the Foundation.
2. The Foundation, at the time of the signing of the employment contract or, alternatively, at the time of the appointment to a position, gives newly hired personnel, whatever the name of their employment relationship, a copy of the Code of Conduct.
3. This Code of Conduct comes into effect from the date of its approval by the Board of Directors with simultaneous repeal of the previous Code.