



FONDAZIONE BRUNO KESSLER – FBK

– **Code of Conduct** –

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### **Article 1. General Provisions.**

1. The principles and contents of this Code of Conduct represent illustrative specifications of the diligence, loyalty, impartiality and good conduct commitments that qualify a proper job performance. Employees commit to comply with them at the time of hiring.
2. Compliance with the provisions of the Code of Conduct is considered essential part of the contractual obligations of employees pursuant to article 2104 of the Italian Civil Code.
3. The following provisions are applicable where laws or regulations do not apply or, in any case, with regard to aspects otherwise not regulated by laws or regulations.
4. Fondazione Bruno Kessler (hereinafter Foundation or FBK) promotes the observance of ethical principles of compliance with the law, employees health, physical and psychological integrity protection, environment protection, honesty, integrity, clarity and transparency, fairness, good faith, fair competition, respect of legitimate interests of all stakeholders.
5. This document is consistent with the principles defined in the *Code of Conduct of Employees of the Autonomous Province of Trento and Instrumental Public Entities of the Province*, approved with resolution of the Provincial Committee no. 1217 dated July 18, 2014 and of the DPR no. 62 dated April 16, 2013.
6. In order to give concreteness and continuity to the principles expressed above and to guarantee FBK's good functioning, reliability and reputation, adequate organizational and operative mechanisms are herein established and formalized and employees are to scrupulously abide by them.

### **Article 2. Subjective Scope of Application of the Code of Conduct.**

1. The contents of this Code of Conduct are binding, insofar as compatible, on:
  - All members of the governance bodies and other corporate bodies;
  - All employees of the Foundation, including Province employees seconded to the Foundation;
  - All collaborators or consultants, regardless of their contract or engagement;
  - Suppliers of goods, services and works operating with the Foundation, regardless of their underlying legal relationship, and their employees or collaborators;
  - Staff present in the Foundation due to secondment agreements;
  - All individuals working at the Foundation due to agreements or inter-institutional accords.
2. Contracts, engagement letters and public notices expressly provide for the application of this Code of Conduct and include termination or forfeiture provisions in case of violation of the commitments deriving from this Code of Conduct.

### **Article 3. General principles.**

1. Employees conform their conduct to the constitutional obligations with discipline and honor and respect the principles of good functioning and impartiality of the Foundation. In performing their tasks, employees ensure compliance with the law and exclusively pursue the Foundation's interests. Employees also inspire their decisions and conducts to the care of the Foundations' interest assigned to them, without abusing their position and their power.
2. Employees respect the principles of integrity, fairness, good faith, proportionality, objectivity, transparency and reasonableness and remain independent in order to avoid taking decisions or performing activities relevant to their duties in circumstances, even only apparent, of conflict of interests. Employees do not perform any activity in contrast with the correct fulfillment of their duties and commit to avoid any circumstance and behavior that may harm the Foundation's interests and image. Public prerogatives and powers – whenever conferred – are exercised solely for the purposes of general interest for which they were conferred.
3. While respecting working hours, employees dedicate the right amount of time and energy to the development of their competences, commit to fulfill them in the easiest and most efficient way and assume the responsibility connected to their tasks. Employees perform their tasks with the maximum affordability, efficiency and effectiveness. The management of public funds for the Foundation's activities shall follow a containment cost logic that do not prejudice the quality of results.
4. Employees use and safeguard with care any asset available by reason of their employment and do not use information available by reason of their employment for private purposes.
5. Employees' conduct shall be such as to establish a relationship of trust and collaboration with the Foundation as well as between the citizens and the Foundation. Employees ensure full equal treatment at equal terms and also refrain from performing any arbitrary action having negative effects on any beneficiary of social actions or entailing discriminations based on gender, nationality, ethnic origin, genetic characteristics, language, religion or belief, personal or political convictions, belonging to national minorities, disabilities, social or health conditions, age, sexual orientation and gender identity or other different factors. In their relation with the citizens, employees demonstrate maximum availability and do not impede the exercise of the citizens' rights. Employees facilitate access to information to whomever have title to access them and, if not prohibited, provide all news and information necessary to evaluate the decisions of the Foundation and the behavior of employees.
6. Employees limit the assignment of tasks to third parties to those that are indispensable and apply any possible measure of simplification.
7. While performing their tasks and within the limits of their competences, employees facilitate the exercise of functions and tasks by any authority competent by territory and closer to interested citizens.
8. Employees demonstrate maximum availability and collaboration in the relation with public administrations and ensure the sharing and transmission of information and

data in any form, even telematics, in compliance with applicable law.

9. Employees shall comply with the principles of diligence, fairness and good faith in performing the tasks assigned under articles 2104 and 2105 of the Italian Civil Code, and collaborators have to comply with the general principal of fairness and good faith in the fulfillment of their contractual obligations.

#### **Article 4. Gifts and Other Benefits**

1. Employees do not ask for, nor solicit gifts or other benefits, for themselves or others.
2. Employees do not accept gifts or other benefits, for themselves or others, except customary gifts of small value, overall not exceeding Euro 100 yearly for each giver and in any case within the overall maximum limit of Euro 200 yearly, made occasionally in the context of relations of courtesy and, if applicable, of international uses.

In any case, regardless of whether the fact constitutes an offence, employees do not ask for gifts or other benefits, for themselves or others, not even of small value, as consideration or recognition for carrying out or having carried out an act of their office, to subjects who may benefit from decisions or activities related to their office, nor to subjects in relation to whom employees have been or are to be called to perform activities or exercise powers connected to their office.

3. Employees do not ask for gifts or other benefits, for themselves or others, except for customary gifts of small value as specified above, to any subordinate or their relatives within the fourth grade. Employees do not accept from the above subjects, for themselves, nor for others, gifts or other benefits, except for customary gifts of small value as specified above. Employees do not offer gifts or other benefits to any subordinate, their relatives within the fourth grade or stable partner, except for customary gifts of small value as specified above.
4. Gifts and other benefits in any way received outside the cases allowed by this article are to be made immediately available to the Foundation to be returned or to be devolved to institutional goals or charity. The competent department draws up a delivery report and a copy thereof is released to the employee returning the gift or other benefit.
5. Employees do not accept collaboration contracts from private subjects who have or have had, in the previous three years, significant economic interests in decisions and activities relevant to their department, such as, for example, private subjects requesting subsidies, grants, financial aids, direct and/or indirect economic advantages of any kind, in particular with regard to the procurement of works, goods and services.
6. The heads of the structures oversee the proper application of this article.

#### **Article 5. Membership in Associations and Other Organizations.**

1. In compliance with the discipline applicable to the right of association, employees notify in writing, within 10 days, their head of department of their adhesion or membership to associations or organizations, even of confidential nature, whose

interests may interfere with the activities of their department, except for political parties or unions.

2. Employees do not force other employees to adhere to associations and organizations, nor induce them to do so by promising advantages or envisioning career or wage disadvantages.

#### **Article 6. Transparency in Financial Interests.**

1. At the time of assignment of tasks, employees inform in writing the Head of Human Resources of all direct or indirect collaborations with private subjects, in any way compensated, occurred in the previous three years, specifying:
  - a) whether such employees, or their relatives or next of kin within the second grade, their spouse or stable partner, still have financial relations with the subject with whom they have previously collaborated;
  - b) whether such collaborations have occurred or are occurring with subjects that have interests in activities or decisions relevant to their department, to the extent limited to the activities assigned to such employees.
2. The Head of Human Resources shall be notified in writing, within 10 days, of any subsequent collaboration. Such obligation of notification is deemed fulfilled in case the Head of Human Resources releases the authorization to accept the collaboration.

#### **Article 7. Conflict of interest and obligation of self-restraint.**

1. Employees refrain from taking decisions or performing activities related to their tasks in circumstances of conflict of interest, even if only potential, with personal interests or interests of their spouse, stable partner, relatives and next of kin within the second grade. The conflict may relate to interests of any kind, even non-financial interests, as those deriving from the intention to indulge in political, unions or hierarchy pressures.
2. Employees also refrain from participating in taking decisions or performing other activities that may involve: their own interests or those of their relatives or next of kin within the second grade; their spouse or stable partner or people with whom they usually meet; individuals or entities against whom employees themselves or their spouse have a pending claim, a severe animosity, or significant debit-credit relations; individuals or entities of whom employees are guardians, trustees, attorneys in fact or agents; entities, associations, also not recognized, committees, companies or establishments of which they are administrators or managers. The conflict may relate to interests of any kind, even non-financial interests, as those deriving from the intention to indulge in political, unions or hierarchy pressures. Employees exercise self-restraint in any case a serious reason of convenience exists.
3. Employees declare in writing to their supervisor the reasons for their self-restraint.

4. Within five days, the supervisor:
  - a) recognizes the conflict of interest and assigns the activities to other employees;
  - b) confirms the assignment of the activities to the employee indicating the underlying reasons;
  - c) promptly requests, if necessary, supplementary information, setting a tight deadline. Having received the supplementary information, the supervisor decides within the following three days.
5. Should a head of department exercise self-restraint, article 14, paragraph 11 applies. Should the obligation of self-restraint be positively recognized, activities are assigned to the substitute of the employee in conflict of interest or to other individual specifically identified.

**Article 8. Interests of the members of the corporate bodies.**

1. Any member of corporate bodies who has an interest, of its own or of third parties, in a specific operation of the Foundation, shall promptly notify the Board of Directors, notwithstanding the more general and rigorous compliance with applicable provisions of the Law.

**Article 9. Prevention of Corruption**

1. Employees comply with any necessary measure to prevent offences in the Foundation. In particular, employees conform to the provisions of the Three-year Plan for Corruption Prevention and Transparency.
2. Employees actively collaborate to prevent corruption. In particular, employees communicate any potentially useful information and proceed to any due notification with the modalities and in compliance with the instructions set forth by the Foundation.
3. Employees who receive notification of judicial documents 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 give immediate notice, in a confidential way, to the Supervisory Body and to the Head of the Corruption Prevention and Transparency Chief Officer.
4. The reporting employee has the right to be duly protected, according to the provisions of the Law, as well as to the Three-year Plan for Corruption Prevention and Transparency.

**Article 10. Transparency and Traceability.**

1. Employees ensure the fulfillment of transparency obligations according to applicable provisions of law and implementing documents adopted by the Foundation and provide their maximum collaboration in the elaboration, finding and transmission of data and documents falling under the obligation of publication in the institutional website.
2. Traceability of employees' decision-making processes shall, in any case, be

guaranteed by adequate documental support, allowing replicability at any time.

#### **Article 11. Conduct in Social Life.**

1. Employees do not take advantage of the Foundation's position to obtain undue benefits. In their private relations, including extra-working relations with public employees in their official functions, employees do not take advantage, mention nor in any way imply, of their own initiative, such position and do not behave in any way that may harm the Foundation's image.

#### **Article 12. Conduct at Work.**

1. Notwithstanding compliance with internal proceedings' deadlines, employees, except for justified reasons, do not delay nor assign to other employees the performance of activities or the power to take decisions within their sphere of competence.
2. Notwithstanding compliance with contractual provisions, employees limit their absences from work to those strictly necessary and use excused absence permits, however named, in compliance with the conditions and purpose provided by the Law, regulations and collective agreements. The head of the competent department verifies that excused absence permits are truly used for the reasons and within the limits provided by law and collective agreements, highlights any deviation thereof and monitors the correct clocking in and clocking out of employees.
3. Except for the exemptions provided in the Foundation's Policy for the Use of Informatics Systems and in the Guidelines for the Use of Mobile and Landline Phones, employees do not use for private purposes any telematics or telephone service nor any asset or equipment available by reason or their employment. Employees who have availability of any means of transportation owned by the Foundation use them exclusively for the carrying out of their tasks and do not transport anyone from outside the Foundation, unless authorized.
4. Employees, with regard to the procurement of goods and services for work related reasons, do not accept for personal use, nor hold or enjoy in a personal capacity, any benefits due to the Foundation.

#### **Article 13. Relations with the Public.**

1. Employees abide by the professional secrecy and privacy law provisions and, whenever orally requested to provide information or documents, which are not accessible insofar as protected by the professional secret or by privacy law provisions, inform the person requesting them of the grounds for denial.
2. Notwithstanding the right, within the limits provided by the law, to express evaluations and disseminate information for the protection of citizens as well as the right to organize, employees refrain from public declarations to the detriment of the Foundation's image. Employees keep the head of their department informed of their authorized relations with the press.



3. Employees do not commit to nor promise any decision or action to be taken or performed by themselves or others related to their office, should this generate or confirm distrust in the Foundation or in its independence and impartiality. Employees provide information and news regarding ongoing or concluded administrative documents or processes in the cases specified in provisions of law and regulations regarding the right of access, and always inform interested parties of the possibility to request access. Employees release copies and extract documents pursuant to their competence, with the modalities set forth by provisions of law regarding the right of access and by the Foundation's regulations.
4. In drafting written documents and in all other communications, employees adopt a precise, clear and comprehensible language.

**Article 14. Specific Provisions for managers and equivalent positions.**

1. Notwithstanding the application of the remaining parts of this Code of Conduct, the provisions of this article apply to managers, including other people assigned with managerial functions, as well as, insofar as compatible with their specific functions and responsibilities, to managing directors and heads of costs centers.
2. Managers diligently perform the functions assigned to them, pursue any assigned goal and adopt an adequate organizational behavior for the fulfillment of their functions.
3. Managers, before taking on their functions and anytime they are so requested, inform the Foundation of any equity participation and financial interest that may put them in conflict of interest with the functions to be performed. Managers also declare whether their relatives and next of kin within the second grade, their spouse or stable partner exercise political, professional or economic activities entailing frequent contacts with the department to be managed or are involved in the decisions or activities related to the manager's position. Managers provide the information requested by the Law regarding their financial situation and their annual tax returns.
4. Managers assume a loyal and transparent attitude and adopt an exemplary and impartial behavior in the relationship with their colleagues, collaborators and recipients of their actions. Managers also ensure that resources assigned to their departments be used exclusively for institutional purposes and in no circumstances for personal needs.
5. Managers take care, compatibly with available resources, of the organizational well-being of their departments, facilitating the establishment of cordial and respectful relationships among collaborators; take initiatives directed at the sharing of information, the training and refresher training of personnel, the inclusion and valorization of differences of gender, age and personal conditions.
6. Managers assign activities based on an equal distribution of the workload, keeping into consideration the skills, attitudes and professionalism of personnel at their disposal. Managers assign additional tasks based on professionalism and, to the extent possible, based on rotation criteria.
7. Managers evaluate employees assigned to them with impartiality and respecting

prescribed indications and deadlines.

8. Managers who become aware of any offence shall promptly undertake all necessary initiatives. In particular, such managers activate the disciplinary proceeding, or promptly inform the Supervisory Board and the Corruption Prevention and Transparency Chief Officer, collaborating to any extent requested. Should managers be informed of any offence, all lawful precautions are to be adopted in order to protect the informant and to avoid that his or her identity be unduly revealed.
9. Managers observe and monitor compliance with the rules of incompatibility as well as accumulation of jobs and assignments by their employees, also in order to avoid not allowed “double jobs” situations.
10. Managers, within their possibilities, avoid the unduly dissemination of false information regarding the organization, activities and employees.  
Managers facilitate the knowledge of good standards and examples in order to strengthen a sense of trust towards the Foundation.
11. In order to apply this Code of Conduct, managers proceed with the communications provided herein to the Supervisory Board and/or the Corruption Prevention and Transparency Chief Officer.

#### **Article 15. Contracts.**

1. In the execution of agreements and contracts on behalf of the Foundation, as well as in their implementation phase, employees do not resort to third party intermediation nor give or promise to anyone any benefit for intermediation activities or for facilitating or having facilitated the execution or implementation of any contract. This paragraph does not apply whenever the Foundation decides to resort to professional intermediation services.
2. Employees do not execute, on behalf of the Foundation, procurement contracts, goods and service contracts, financing contracts, or insurance contracts with companies with which they have stipulated contracts of private nature or from which they have received other benefits in the three previous years, except for those contracts executed pursuant to article 1342 of the Italian Civil Code. Should the Foundation execute work contracts, goods and service contracts, financing contracts, or insurance contracts with companies with which employees have stipulated contracts of private nature or from which employees have received other benefits in the three previous years, such employees refrain from taking any decision or performing any activity related to the implementation of those contracts.
3. Employees executing agreements or contracts of private nature, except for those contracts executed pursuant to article 1342 of the Italian Civil Code, with individuals or private entities with which they have executed, in the previous three years, procurement contracts, goods and service contracts, financing contracts, or insurance contracts on behalf of the Foundation, shall inform their supervisor in writing.
4. Any employee who receive oral or written complaints on the performance of their department or on the performance of their collaborators, from individuals or entities participating in contractual procedures with the Foundation, shall promptly inform

his or her supervisor, normally in writing.

**Article 16. Supervision, Monitoring and Training Activities.**

1. Managers and officers with equivalent positions, the Supervisory Board and the Head of the Corruption Prevention and Transparency monitor the application of this Code of Conduct.
2. The Foundation avails itself of the department devoted to disciplinary matters for the purpose of oversight and monitoring activities provided by this article.
3. The Corruption Prevention and Transparency Chief Officer and the Supervisory Body shall take care of the spread of the Code of Conduct in the Foundation, the annual monitoring of its implementation.
4. Training activities on transparency and integrity matters are provided to employees which should allow them to acquire full knowledge of the contents of this Code of Conduct, as well as to be updated on an annual and systematic basis on any applicable measure and provision in such matters.
5. The implementation of the provisions of this article shall not entail new and higher costs for the Foundation. The Foundation complies with its obligations within the human, financial and instrumental resources available.

**Article 17. Obligations connected to Results Evaluation.**

1. Managers or the likes provide to the Evaluation Team all necessary information for a complete evaluation of results achieved by their departments.

**Article 18. Liability connected to the violation of the obligations of the Code of Conduct**

1. The violation of any obligation provided by this Code of Conduct is considered as a conduct against official duties. Notwithstanding any criminal, civil, administrative or accounting liability, any violation of this Code of Conduct as well as of the provisions of the Three-year Plan for Corruption Prevention and Transparency and the Organization, Management and Control Model entail a disciplinary sanction verified at the end of the disciplinary procedure, in compliance with the principles of graduality and proportionality of the sanctions.
2. Any violation of this Code of Conduct constitutes a breach of contract as well as a disciplinary violation, for what employees are concerned, with subsequent application of sanctions and provisions pursuant to applicable collective agreements, as well as the filing of claims for any damage suffered by the Foundation as a result of such conducts.  
Employees' failure to comply with the provisions of this Code of Conduct may entail the application of disciplinary sanctions according to the Law and the collective agreements in force at the Foundation.
3. In order to determine the type and scope of the disciplinary sanction to be concretely applied, each violation is evaluated on a case-by-case basis with regard to the gravity

of the conduct and the extent of the prejudice, even moral, deriving to the decorum or prestige of the Foundation.

**Article 19. Organization, Management and Control Model pursuant to Legislative Decree no. 231/2001 and Three-year Plan of Corruption Prevention and Transparency.**

1. This Code of Conduct constitutes one of the documents of reference for the effectiveness of the Organization, Management and Control Model, adopted by the Foundation pursuant to Legislative Decree No. 231/2001, and the Plan for Corruption Prevention and Transparency pursuant to Law no. 190/2012, and Legislative decree No. 33/2013. Any operation and payment made by the Foundation shall be legitimate, adequately authorized, registered, traceable and verifiable, coherent and congruous.
2. For anticorruption purposes, whose organizational and operative mechanisms implemented on specific processes at risk are detailed in internal regulations to be referred to, the Foundation undertakes to guarantee the prevention of corruption both from the active and passive perspective aiming to comply with the provisions of Legislative Decree no. 231/2001, and Law no. 190/2012.

**Article 20. Relations with the Public Administration.**

1. In the relations with the Public Administration and public employees, the Foundation takes particular attention so that any document, conduct or agreement be characterized by the maximum transparency, fairness and lawfulness. To this end, the Foundation avoids to assign the entire process to a single individual, on the assumption that a plurality of individuals and functions minimizes the risk of incorrect interpersonal relationships. Furthermore, as far as possible, in the relations of inspective and authorizing nature, the Foundation facilitates the plurality of contacts of reference, again on the assumption that this may minimize such risk.
2. During negotiations or any relations with the Public Administration, employees refrain from behaving in such a way as to unduly influence the decision of the counterparty. In particular, it is not allowed to: examine or suggest employment and/or commercial opportunities that may personally advantage public employees; solicit or obtain confidential information that may personally compromise public employees; solicit or obtain confidential information that may compromise the integrity or reputation of both parties.
3. All provisions that are valid for the Foundation's employees are also applicable to any external consultant and its employees hired by the Foundation to be represented or received technical-administrative assistance in the relations with the Public Administration.
4. It is expressly forbidden to allocate disbursements, grants, financings or tax breaks received by national, European or international public entities to activities other than

those they are intended to.

#### **Article 21. Relations with Suppliers.**

Relations with suppliers of the Foundation, including relations of financial and consultancy nature, are to abide by the principles contained in this Code of Conduct and are subject to constant and careful monitoring by the Foundation itself.

The Foundation deals with suppliers that comply with applicable law and the provisions contained herein.

The selection of suppliers and the determination of the purchasing conditions shall be based on principles of affordability, effectiveness, impartiality, equal treatment, transparency and publicity.

In particular, suppliers of machineries and equipment shall be selected also based on the compliance of the supply with provisions of law regarding hygiene and safety at work. The supply of individual protection devices and in any case general safety and prevention devices shall comply with any obligation regarding general and specific certification and suitability, in relation to their use.

#### **Article 22. Relations with the Mass Media.**

All contacts with the media shall be exclusively kept by employees expressly assigned to such function. Relations with the media shall be respectful of the right of information. Any information provided to the media shall be accurate, coordinated and coherent with the principles and policies of the Foundation; it shall comply with the law and the rules of good professional conduct; it shall be clear and transparent. Disseminating false information is forbidden.

#### **Article 23. Relations with Clients.**

1. The Foundation is primarily active in research activities. However, the Foundation may also carry out commercial activities. In such cases, the Foundation orients its activity to the satisfaction and protection of its clients, paying attention to the requests that may facilitate an improvement in the quality of products and services.
2. The Foundation conducts commercial negotiations with fairness and clarity and comply with its obligations with the maximum diligence. Adequate conditions shall be applied to each type of client, establishing equal treatments for clients in the same conditions and in any way conforming to the standards of the market of reference. Any action directed at altering the conditions of fair commercial competitiveness is contrary to the Foundation's policy and is forbidden to any subject acting on behalf of it.
3. In no circumstances, the pursuing of the Foundation's interests may justify a conduct, which is not respectful of applicable law and the provisions of this Code.

#### **Article 24. Health and Safety.**

1. The Foundation carries out its activity in compliance with health and safety at work standards and environment protection; it guarantees the physical and moral integrity

- of its employees and collaborators, working conditions respectful of the individual dignity and safe and healthy workplaces, in full compliance with applicable law regarding the prevention of work related injuries and the protection of workers.
2. The Foundation carries out its activity on technical, organizational and economic conditions such as to ensure an adequate prevention of work related injuries and safe and healthy workplaces.
  3. The Foundation undertakes to:
    - identify, evaluate and, whenever possible, eliminate all health and safety risks;
    - reduce to the minimum any risk that may not be avoided;
    - tackle risks at their source;
    - adapt the work to the workers, in particular with regard to the concept of working stations and the selection of equipment and work methods;
    - keep into account, in the planning and implementation of prevention and protection activities, of any technical evolution;
    - substitute that which is dangerous with that which is not or is less dangerous.
  4. The Foundation plans prevention activities giving priority to collective protection measures rather than individual ones and aiming at a coherent complex that may integrate in itself technics, organization, working conditions, social relationships and the influence of work related factors.
  5. The Foundation undertakes to disseminate and consolidate among all its employees and collaborators a culture of safety, developing risks awareness and promoting responsible behaviors from everyone.

Employees shall contribute to the process of risks prevention and health and safety protection for themselves, their colleagues and third parties.
  6. Employees shall also maintain a climate of mutual respect of everyone's dignity, honor and reputation.
  7. In the context of activities performed within or for the Foundation, there exists a general prohibition of excessive use of alcohol, a prohibition of drugs and a prohibition to smoke in enclosed spaces or in any circumstance in which smoke may determine danger for buildings or assets of the Foundation and for the health and safety of colleagues and third parties.

#### **Article 25. Environment Protection.**

1. Environment is a primary asset for the community that the Foundation intends to contribute to safeguard. To this end, the Foundation plans its activities aiming at a balance between economic initiatives and environmental needs, in compliance with applicable provisions of law and regulations, giving its maximum collaboration to public environmental surveillance and protection Authorities.
2. Employees contribute to the process of environment protection. In particular, employees involved in processes at risk shall pay maximum attention to avoid any unlawful dumping or emission of toxic materials and shall manage garbage and waste processing according to specific prescriptions of law.

**Article 26. Principles of Conduct with Controlled, Connected or Participated Entities.**

The relations between the Foundation and the entities controlled by and/or connected to and/or participated by the Foundation are inspired to transparency and fairness principles and to the ethical values expressed in this Code of Conduct.

**Article 27. Reporting Code of Conduct violations.**

1. With no prejudice to the reporting obligations for employees set forth in the Organization. Management and Control Model, anyone who observes or is victim of any conduct not in line with the provisions of this Code of Conduct may inform the Supervisory Board in writing and in anonymous form, even by means of confidential reporting channels, as well as the Corruption Prevention and Transparency Chief Officer, should there be any anti-corruption issue.
2. The Supervisory Board and the Corruption Prevention and Transparency Chief Officer shall initiate, to the extent of their concern, the investigation on the information received in the modalities and timing defined and formalized in the Foundation's internal regulations in force.

**Article 28. Publicity and Entry into Force.**

1. The Foundation gives ample publicity to this Code of Conduct by publishing it on the institutional website and by emailing all employees about its official adoption. The Foundation also ensures such communication to all consultants and collaborators, of any kind, even professionals, to the members of any corporate body and to any subject who directly collaborates with the Board of Directors, as well as with collaborators of any kind, even professionals, of suppliers of services provided in favor of the Foundation.
2. This Code of Conduct enters into force at the date of approval by the Board of Directors and the Foundation gives immediate communication to its employees, by publishing this Code of Conduct on the institutional website.