



Code of Ethics

HUMANITAS UNIVERSITY

Guidelines for integrity and transparency

**Approved by C.d.A. [Consiglio di Amministrazione (Board of Directors)]
24 June 2014**

<p style="text-align: center;">1. Introduction</p>	<p>Guiding principles Humanitas University (hereinafter, also referred to as the University) is an independent legally recognised university guided by the principles of Article 33 of the Constitution. Its primary purpose is the promotion of scientific research, university studies, advanced training and technology transfer in the field of medical and social sciences within an international perspective. Humanitas University is a non-profit organisation and protects researching and teaching freedom as well as fostering the absence of any form of discrimination. Humanitas University adopts specific policies for the right to education in order to foster, pursuant to Article 34 of the Constitution, access to higher education to capable and deserving students, even if without financial means.</p> <p>Humanitas University approved this code of ethics to ensure that all institutional stakeholders, the community, public administration, European community, scientific and academic community, board members, students, professor, researchers, employees, associates and trainees, whether paid or unpaid, the full implementation of the purposes, values and principles enshrined within the by-laws.</p> <p>The Contents of the Code apply to the governing body, advisors, regulatory and auditing members of the University, the students, professor, trainees, whether paid or unpaid, researchers, employees and collaborators. External parties (i.e., suppliers) must accept the principles of the Code to have contractual and/or business relationships with the University. This Code of Conduct establishes the policies and standards of integrity and transparency, which is binding on all parties listed in the preceding paragraph.</p> <p>No interest or benefit pursuable by the University exist that may excuse a conduct contrary to the principles of this Code.</p> <p>Compliance with the provisions of the Code must be deemed an essential part of the contractual and ethical obligations towards the University.</p> <p>Any violation of this code, shall always and under all conditions, be deemed contrary to the interests and to the values of Humanitas University.</p> <p>A personal commitment of compliance with laws, honesty, and loyalty to Humanitas University as well as transparency is required. As part of the relationship with Humanitas University, members of the governing body, and regulatory and compliance advisors for the University, students, professor, trainees whether paid or unpaid, researchers, as well as employees and collaborators:</p> <ul style="list-style-type: none"> • must perform their duties in compliance with laws, codes of professional ethics, internal and external guidelines of this Code; • must always act on the basis of a personal commitment to honesty, loyalty towards Humanitas University and transparency in all work, research and study activities; • must take all necessary precautions to prevent the University from being involved in illegal activities.
<p style="text-align: center;">2. Dissemination and knowledge of the code of ethics</p>	<p>Dissemination and knowledge of the code of ethics The University introduces appropriate measures to ensure knowledge of the code and its application in the workplace by the members of governing bodies, advisors, regulatory and compliance bodies of the University, students, professor, trainees, whether paid or unpaid, researchers, employees and associates, and where applicable, by consultants and suppliers.</p>

<p style="writing-mode: vertical-rl; transform: rotate(180deg);">3. Compliance with the Code of Conduct</p>	<p>The Code guidelines shall prevail over the instructions issued by the internal organisational hierarchy, in the event of a conflict.</p> <p>The code is freely available on the website of Humanitas University and available at the Secretariat of the Dean.</p> <p>Acceptance of the code of conduct established within this Code is a condition to be part of the government, advisory, regulatory and compliance bodies of the University, to study at Humanitas University and to establish a working, research or internship relationship.</p> <p>The application of this Code, is within the non-delegable personal responsibility of each party, which once notified, if in breach, may not invoke lack of awareness of the Code or having received conflicting information from any hierarchical level.</p> <p>It is hoped that each of the recipients of this Code shall adopt a proactive attitude, avoiding an attitude of passive tolerance in the face of possible infractions and acting on its own initiative, whenever detecting deviations from the principles outlined within this Code and to not undertake passive conduct when faced with situations contrary to the criteria set forth within this Code.</p> <p>It is also hoped that each Associate cooperate, where required, in the event of external investigations.</p> <p>Professors and superiors should not approve or tolerate breaches of the Code. In the event that violations are found, they must immediately be made known to the structures in charge.</p> <p>Disciplinary sanctions, in accordance with the University By-laws, the CCNL [Contratto Collettivo Nazionale di Lavoro (National Collective Bargaining Agreement) and the Worker's By-laws, where applicable, may result, according to the seriousness of the infraction and in compliance with current law, to dismissal for just cause, suspension, termination from study programme and may also lead to legal action which may be lodged if the University sustains damage as a result of conduct contrary to this Code.</p>
<p style="writing-mode: vertical-rl; transform: rotate(180deg);">4. Reports of violation of the Code</p>	<p>Pursuant to the Code, students, professor, trainees whether paid or unpaid, researchers, employees and associates have a duty to report potential violations of this Code of Ethics.</p> <p>It is possible to protect the anonymity of the reporting party and respect the right to defence of staff involved.</p> <p>To facilitate forwarding of improper conduct reports, the following whistle blowing channel is in place: segnalazioni@hunimed.eu</p> <p>This channel of communication ensures that those parties who intend to use it shall have available suitable measures necessary to prevent any form of retaliation against them.</p>

5.1 Transparency and traceability of decisions

The information must be accurate and the decisions must meet the requirements of transparency and traceability

Each of the recipients of this Code must adopt all the necessary procedures to ensure transparency of the information and decisions.

For purposes hereof, information is transparent when it accurately reflects reality.

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

1. It was taken with the approval of an appropriate hierarchical level;
2. is based on a rational analysis of risk;
3. leaves traces of its basis and the process implemented.

5.2. Conflicts of interest and duty of loyalty.

Conflicts of interest must be disclosed.

A real or potential conflict of interest exists, when a relationship between one of the recipients of this Code and a third party might negatively affect the interest, the good name of the University, fairness and impartiality and the transparency of decisions. Situations of potential conflict must be made known to the Chairman, the Managing Director and to the Dean, so that they may proceed to establish the necessary measures to ensure fair and impartial criteria and actions towards those who are in a potential conflict of interest.

The University teaching staff that conducts clinical-support care must avoid all conditions in which their professional opinion relative to their primary interest, that is the health of patients, may be unduly influenced by a secondary interest of any type.

In their relationships with suppliers, and contractors, each party must favour the interests of the University relative to any other situation that could result in a personal, actual or potential benefit for themselves or for their family members or their partners (defined as parties that contractually or by association entertain relationships of an entrepreneurial nature with one of the recipients of this code).

In making any work-related, clinical, or study and research related decision, the following questions must be taken into consideration:

1. Does this decision comply with the principles to the letter, of the Code of Ethics?
2. Does this decision comply with applicable laws and Codes of Professional Conduct?
3. Does this decision comply with the internal rules and regulations of the University?
4. Can this decision be deemed the most appropriate?
5. If said decision were to be made public knowledge, might it somehow jeopardise or harm in any manner, the public image of the University?
6. In my activities, are prescriptions and treatments administered to patients aimed at achieving a benefit for the patient in all circumstances?
7. Do I perform my activities avoiding any circumstance in which professional judgement concerning the health of patients may be unduly influenced by any type of secondary interest?

5.3. Relationships with consultants and suppliers, gifts and other forms of giveaways.

Acceptance of gifts is limited.

Recipients of this Code are permitted to accept gifts or other forms of giveaways, only if they are limited in value, and do not appear aimed at obtaining undue advantages to a casual observer.

Those receiving gifts or favours, not directly attributable to normal courtesy, shall refer to the Managing Director in order to receive instructions relative to the destination of the same.

Cash gifts or goods easily convertible to cash, may not be accepted under any circumstances.

Participation by invitation to events, conferences, conventions, and visits of other Universities, must be authorised by the Managing Director. Restrictions on receipt of gifts also extend to family members of recipients of this code.

Consultants and suppliers should be paid only for work actually performed and to an appropriate extent. Suppliers must be selected based on a qualitative-quantitative assessment of the offers made. Offers and agreements with suppliers must always be traceable through duly signed agreements.

5.4. Use of the assets of the University

A prudent and responsible use of the assets is required.

The recipients of this Code using assets of the University must ensure that they are used for righteous purposes by duly authorised persons.

In accordance with legislation in force, students and staff have the responsibility to protect the company's assets and all other property, whether tangible or intangible, of the University from unauthorised uses, breach of trust, damage or loss deriving from inexperience, negligence or wilful misconduct.

5.5. Safeguarding information and its privacy

University information must be only accessible to authorised persons and must be protected from undue disclosure.

Subject to the duty to disclose the information and documents required by legislature and regulations, only parties expressly authorised by Humanitas University may have access to internal information, whether in hard copy or on magnetic, electronic or optical media. Information may only be used for purposes and periods specified in the relative authorisations.

Passwords are equivalent to signatures, may only be known by their respective owners and cannot be divulged to third parties.

Each party must work towards adopting all the necessary measures to preserve the information made available to them by the University, from risk or damage or loss and must proceed to its proper storage for the time period established by law and internal regulations.

5.6. Privacy Protection

The University ensures that personal and sensitive data acquired for performance of its role are processed, communicated and disseminated in compliance with the national legislation on Privacy Protection.

Failure to comply with confidentiality obligations shall constitute a **serious** breach if it involves dissemination or if it provides the opportunity for dissemination **by any means**, of information relative to the health status of patients treated by professors of the University.

The university shall take all the necessary measures to store personal and sensitive data, pursuant to the applicable provisions of Legislative Decree 196/03 and of the applicable privacy legislation.

5.7. Use of technological resources

Hardware and software must be used only for activities of the University, for research, studying or for other uses expressly authorised. The use of unlicensed software is strictly prohibited.

Recipients of this Code may not use equipment, systems and technological devices for purposes other than those expressly authorised.

The use of software programmes that do not meet the official standards is not permitted, unless authorised in writing by the Managing Director. It is not permitted to add illegal software copies into the IT system of the University.

Parties using technological resources shall be notified about user restrictions and shall operate so as not to violate user-licensing agreements or do anything that may create a liability for Humanitas University.

Technological resources shall be used in compliance with local regulations and according to current legislation and procedural rules established by relevant departments.

5.8. Intellectual property rights and copyright

Ownership of intellectual property rights and copyright, developed in the workplace, is reserved to the University.

The recipients of this Code must respect copyright on the projects, texts, systems, procedures, methodologies, studies, reports, projections or any other activity granted in use.

5.9. Relations with Public Administration

Relations with Public Administration, including herein, the European Union, are based on a sense of responsibility, fairness and spirit of cooperation.

Gifts, acts of courtesy and hospitality are permitted when of a modest value and in compliance with applicable laws, and in any case they do not compromise the integrity or reputation of one of the parties and cannot be construed, by an impartial observer, as aimed at obtaining an undue advantage. In any case, this type of expenses must be authorised by the Managing Director and adequately documented.

5.10. Study, research and work environment.**The University prohibits discrimination in treatment of staff.**

All parties interested in study and research activities performed by the University, may aspire to access degree courses, doctorates and research projects at Humanitas University, as long as they meet the necessary requirements.

All persons may aspire to be hired at Humanitas University or be taken in consideration for a new position solely based on service requirements, of scientific and academic objectives and merit criteria, without arbitrary discrimination.

All recipients of this code at any level and with any qualification shall cooperate to maintain a climate of mutual respect in the face of personal differences.

5.11. Humanitas University promotes a respectful, healthy and safe work environment.

In compliance with the regulatory framework and guidelines aimed making the work environment safe and healthy, Humanitas University is committed to ensuring a safe and healthy work environment by monitoring, management and prevention of risks connected to performance of professional activities of study and research.

Humanitas University prohibits and shall not tolerate the use of alcohol and drugs, sexual harassment and any type of discriminatory action. In particular, the psychological-physical health of students and staff at any level and with any qualification is safeguarded.

In this respect, Humanitas University condemns unethical behaviour and particularly any type of behaviour exerted on students and staff that may cause damage to health. The organisation of study, research and work activities shall therefore be designed to avoid any oppressive organisational situation and/or psychological violence, pursuant to current regulations.

5.12. Community relations**Humanitas University limits political participation in the name of the University and regulates relations with government officials and members of public administration**

Staff is not authorised to publicly support, in the name of Humanitas University, political parties, participate in election campaigns, or take part in religious, ethnic, political or international conflicts.

All staff must comply with legislative and regulatory provisions which govern relationships with public administration officials.

5.13. Humanitas University promotes compliance with environmental legislation.

Compliance with legislative and regulatory provisions also extends to laws on environmental protection and rational use of natural resources.

5.14. Accounting records**Accounting records must always be truthful and transparent.**

Financial statements, balance sheets and financial statements should truthfully and accurately show the equity, economic and financial status of the University.