



**CODE OF ETHICS**  
**INTEGRITY AND TRANSPARENCY GUIDELINES AND**  
**REGULATIONS**

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## 1. INTRODUCTION

### Fundamental principles

Humanitas University (hereinafter also the University) is a legally recognised autonomous university institution inspired by the principles of Article 33 of the Italian Constitution. Its main purpose is the promotion of scientific research, university studies, advanced training and technology transfer in the medical and social sciences in an international perspective. Humanitas University is non-profit-making and guarantees the protection of freedom of research and teaching as well as the absence of any form of discrimination. Pursuant to Article 34 of the Constitution, Humanitas University adopts specific right-to-study policies to promote access to advanced studies for capable and deserving students, even if without means.

Humanitas University has approved this Code of Ethics in order to guarantee to all institutional stakeholders – the community, public administration, the European community, the scientific and academic community, board members, students, teaching staff, researchers, employees, collaborators and trainees with or without remuneration – the full implementation of the objectives, values and principles enshrined in the Statute.

**The Contents of the Code apply to members of the University's governing, consultative, governance and audit bodies, students, teaching staff, trainees with or without remuneration, researchers, employees and collaborators (hereinafter Collaborators). External parties (e.g. suppliers) must accept the principles of the Code in order to enter into contractual and/or commercial relations with the University.**

This Code lays down the standards of conduct, integrity and transparency to be followed by all the parties mentioned in the previous paragraph.

There are no interests or advantages to be gained by the University that could excuse conduct contrary to the principles of this Code.

Compliance with the rules of the Code must be considered an essential part of contractual and ethical obligations towards the University.

Any violation of this Code, at all times and under any conditions, must be considered contrary to the interests and values of Humanitas University.

**A personal commitment to compliance with the law, honesty, transparency and loyalty to Humanitas is required.**

Within the relationship established with Humanitas University, members of the University's governing, consultative, governance and audit bodies, students, teaching staff, trainees with or without remuneration, researchers, employees and collaborators (hereinafter Collaborators) must:

- perform their duties according to the applicable laws, codes of professional ethics, internal or external regulations and the guidelines of this Code;
- at all times act on the basis of a personal commitment to honesty, loyalty to Humanitas University and transparency in all work, research and study activities;
- take all necessary precautions to prevent the University from being involved in unlawful activities.

## **2. DISCLOSURE AND KNOWLEDGE OF THE CODE OF ETHICS**

### **Disclosure and knowledge of the Code of Ethics**

The University shall introduce appropriate measures to ensure that the Code is known and applied in the working environment by members of the University's governing, consultative, governance and audit bodies, students, teaching staff, trainees with or without remuneration, researchers, employees and collaborators, and where applicable by consultants and suppliers.

The University shall monitor the application and implementation of the Code and, with the supervision of the Supervisory Board, decide on any questions concerning the interpretation and application of the Code that cannot be satisfactorily resolved by the University's normal hierarchical organisation.

Students, teaching staff, trainees with or without remuneration, researchers, employees and collaborators who would like more information than that provided by their superiors may contact the Supervisory Board by email at: [odv@humined.eu](mailto:odv@humined.eu).

## **3. COMPLIANCE WITH THE CODE OF ETHICS**

**Where there may be conflict, the Code's guidelines take precedence over instructions issued by the internal hierarchical organisation.**

The Code is freely available on the Humanitas University website and at the Rector's Office.

Acceptance of compliance with the provisions set out in this Code is a condition for being part of the University's governing, consultative, governance and audit bodies, for studying at Humanitas University and for establishing a work, research or internship relationship.

All staff, persons belonging to management bodies, consultants, and more generally all third parties who enter into relations with Humanitas University must read the Code and undertake to follow the rules and requirements it contains.

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The application of this Code is the responsibility of each individual who, once informed, may not invoke lack of knowledge of the Code or having received instructions to the contrary from any hierarchical level as justification for their nonfulfilment of it.

It is hoped that each recipient of this Code will adopt a proactive attitude and avoid passive tolerance of possible infringements. If deviations from the outlined principles are detected, such conduct must be reported to the relevant structures.

It is also hoped that, if requested, every Collaborator will cooperate in internal investigations.

#### **4. REPORTS OF BREACHES OF THE CODE OF ETHICS AND DISCIPLINARY SYSTEM**

Without prejudice to the operating procedures issued by Humanitas University to regulate processes, the University prohibits any conduct that does not comply not only with the law, but also with the spirit and requirements of this Code, even when such conduct is adopted with the intention of bringing an advantage to the University itself.

**The Code provides for the right and duty of students, teaching staff, trainees with or without remuneration, researchers, employees and collaborators to report possible violations of this Code of Ethics and any conduct contrary to its rules, whether proven or presumed.**

Any reports of improper behaviour should be submitted using the following channels:

- email address: [segnalazioni@hunimed.eu](mailto:segnalazioni@hunimed.eu)
- whistleblowing platform: <https://www.mygovernance.it/token-humanitas/>

The University has taken all necessary measures to safeguard the confidentiality of the identity of the whistleblower and to ensure the confidentiality of the information received, the fair treatment of staff involved in conduct contrary to the Code and the right of defence of each individual.

The principles expressed in the Code are an integral part of the conditions governing employment and participation in courses at Humanitas University; any violations may therefore result in the application of disciplinary sanctions.

Teaching staff and supervisors must not approve or tolerate breaches of the Code. Should they find any violations, they must immediately report them to the relevant structures.

Disciplinary sanctions, where applicable, will be imposed according to the Regulation governing the functioning of the Disciplinary Board, the relevant CBA, the

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current university legislation and the Workers' Statute. Depending on the seriousness of the breach and according to current legislation, the sanctions may lead to removal or dismissal with cause, and to legal action, which may be brought even after removal or dismissal.

## **5. GUIDELINES**

### **5.1. COMPLIANCE WITH LAW**

**Staff are required to comply with current legislation.**

All persons to whom this Code applies must always comply with the regulations in force in this country and must be aware of the legal implications of their activities; the University is required to provide the necessary information.

Persons to whom the Code applies must take all necessary precautions to prevent the University from being involved in unlawful activities.

### **5.2. TRANSPARENCY AND TRACEABILITY OF DECISIONS**

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

Each person to whom this Code applies must adopt all necessary procedures to ensure the transparency of information and decision-making processes.

For the operational objectives, information is transparent when it truthfully and accurately reflects reality.

A decision is defined as transparent when it satisfies all the conditions below:

- it is approved at an appropriate hierarchical level;
- it is based on a rational risk analysis;
- it leaves a trace of its foundations;
- it puts the interests of Humanitas University ahead of personal interests.

### **5.3. CONFLICTS OF INTEREST AND DUTIES OF LOYALTY**

**Conflicts of interest must be avoided.**

All persons to whom this Code applies must act exclusively in pursuit of the institutional purposes of Humanitas University, according to the corporate values, avoiding any situation of conflict of interest.

A conflict of interest is defined as any situation, actual or potential, in which the conduct (understood as an action, judgement or decision) of the Collaborator may be influenced by a direct or indirect personal interest, such as to

compromise its impartiality or such as to give rise to suspicions, however unfounded, in the public mind about its lack of impartiality.

Personal interest is defined as an interest of any kind, whether pecuniary or non-pecuniary, including an interest deriving from the intention to yield to pressure from political bodies, trade unions, hierarchical superiors or colleagues, of the Collaborator themselves or of third parties, including a spouse, cohabitants, relatives to the second degree by blood or marriage of the Collaborator themselves or of subjects whom the Collaborator habitually meets with, or natural or legal persons with whom the Collaborator has pending litigation, serious enmity or significant relationships of credit or debt, or of whom they are a trustee, guardian, attorney, agent, partner, director or collaborator in any capacity.

Without prejudice to the transparency obligations laid down in laws or regulations, upon commencement of the contractual relationship of collaboration or employment, or of any other type, with Humanitas University, the Collaborator must provide information in writing of all direct or indirect relations of collaboration with public subjects that they have or have had in the previous three years, specifying:

- a) whether they, or their relatives to the second degree by blood or marriage, spouse or cohabiting partner still have a financial relationship with the person with whom they had the aforementioned relations;
- b) whether such relations have taken place or are taking place with persons having an interest in activities or decisions inherent in the activity carried out in the interest of the Company, limited to the files entrusted to the Collaborator.

All Collaborators must provide immediate written notice if there are any changes to the situation communicated at the start of the contractual relationship with Humanitas University. With reference to teaching staff, please note that all teaching staff are also required to comply with the *Regulations for the performance of outside appointments by Academic Staff*, referred to herein in full.

All Collaborators must fairly, objectively and impartially assess any business relationships they have, e.g. with suppliers, contractors, subcontractors, consultants and competitors, giving priority to the University's interests.

In any case, Collaborators must not use their position or information they have received in the context of their relationship with Humanitas University to obtain advantages, direct or indirect, pecuniary or non-pecuniary, for themselves or their family members or for persons whom they habitually meet with, or for their associates or collaborators in any capacity.

By way of example, the following situations may constitute a conflict of interest or compromise the Collaborator's judgement or impartiality:

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- personal or professional relationships or habitual acquaintance or serious enmity or debt/credit relationships with teaching staff, suppliers, customers and competitors (without appropriate authorisation by the University);
- the assumption by the Collaborator of direct or indirect offices, appointments or interests, including through intermediaries, with suppliers, customers and competitors;
- direct or indirect pressure brought to bear on the Collaborator from political bodies, trade unions, hierarchical superiors or colleagues;
- exploitation of their position for the realisation of their own interests, and/or those of third parties, in conflict with those of Humanitas University;

Generally speaking, in order to assess the existence of a conflict of interest, even a potential one, it may be useful to ask yourself some questions such as the following:

- Do I have a personal interest of my own or of a relative or acquaintance that conflicts or can be perceived to conflict with my work role/professional relationship with Humanitas University?
- Do I have a personal or professional relationship that interferes with my role, working hours or the activities of other Humanitas University resources?
- Could there be any advantages for me in the immediate or future that might call into question – even groundlessly – the objectivity/impartiality of my work for Humanitas University?
- Could my decision or involvement in a particular decision or action give rise to suspicions – however unfounded – on the part of the public of a lack of objectivity or impartiality?
- Are there risks to my reputation or that of Humanitas associated with a particular decision or action I have taken?
- Could there be detrimental consequences, even if only reputational, for Humanitas University resulting from my decision and/or my action or behaviour?

#### **5.4. RELATIONS WITH CONSULTANTS AND SUPPLIERS, GIFTS AND PRESENTS**

**The granting and acceptance of gifts/presents and any other form of benefit is restricted.**

Any giving of gifts/presents or other forms of benefit is restricted and subject to the approval of the University's CEO.

Persons to whom this Code applies are permitted to accept gifts or presents only if they are of moderate value and in any case such that they cannot be interpreted,



by an impartial observer, as tools aimed at obtaining an improper advantage.

Any receipt of gifts/presents or any other form of benefit is restricted and must occur in a transparent manner to avoid the creation of constraints or factors that may negatively affect the University's interests.

Anyone receiving gifts or favourable treatment not directly attributable to normal courteous relations must consult the CEO and inform the Supervisory Board by email (odv@hunimed.eu), in order to receive instructions on the destination of such gifts.

Under no circumstances may gifts in the form of money or goods easily convertible into money be given/accepted.

Restrictions on the receipt of gifts also extend to family members of the persons to whom this Code applies.

Participation by invitation at events, conferences, conventions, visits of other universities must be authorised by the CEO, who shall inform the Supervisory Board by email (odv@hunimed.eu).

Consultants and suppliers shall be remunerated only for the work actually performed and to an appropriate extent. Suppliers shall be selected on the basis of a qualitative and quantitative evaluation of the offers made. Offers and agreements with suppliers must always be traceable through duly signed contracts.

## **5.5. USE OF UNIVERSITY PROPERTY**

**University property must be used prudently and responsibly.**

Persons to whom this Code applies who use University property must ensure that it is used for appropriate purposes by duly authorised persons.

In accordance with current regulations, students and staff are responsible for protecting the University's corporate assets and any other property, whether tangible or intangible, from unauthorised use, abuse of trust, or damage or loss resulting from inexperience, negligence or wilful misconduct.

## **5.6. SAFEGUARDING INFORMATION AND ITS CONFIDENTIALITY**

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

Without prejudice to the duty of dissemination of information and acts laid down in the rules and regulations, only persons expressly authorised by Humanitas University may have access to internal information, whether on paper or in magnetic, electronic or optical form. The information may only be used for the purposes and for the periods specified in the relevant authorisations.

Passwords are equivalent to a signature and may only be known by their respective holders and may not be disclosed to third parties.

Each person must take all necessary measures to preserve the University's information at their disposal from the risk of damage or loss and must provide for its safekeeping for the periods of time stipulated by law and internal regulations.

## **5.7. CONFIDENTIALITY OF COMPANY INFORMATION**

**University information that cannot be legally disclosed must be treated confidentially.**

Collaborators must safeguard the confidential nature of information acquired in the performance of assigned work activities, decisions and activities undertaken by the University, even if such information is not specifically classified as confidential and does not specifically concern Humanitas University but competitors, suppliers, and public bodies connected with the University's activities, irrespective of how such information is obtained or communicated.

Some Collaborators regularly or occasionally have access to confidential information in the course of their work. This includes, for example, information related to strategic plans, financial data, merger or acquisition activities, shareholder data, compensation or other employee data, current and future services, potential contracts, financial results or information not yet issued, financial projections, information stored in the data storage systems of Humanitas University, or other types of information.

Humanitas University's confidential information must never be shared with anyone who does not need to know that information to perform work or services for the University.

All documents, memoranda, notes, records, filings, correspondence, manuals, templates, specifications, programs, emails, electronic databases, maps, and any other writings or materials of any kind produced by or coming into the possession of the University Collaborator during the period of employment that contain or disclose confidential information of Humanitas University are and shall remain the property of the University. These, and any copies, shall be promptly returned to Humanitas University upon termination of the assignment or employment relationship for whatever reason.

Information relating to Humanitas University decisions and activities must be kept confidential according to current regulations, even after the employment relationship has ended, until it becomes public knowledge.

Humanitas University respects the privacy of its employees and third parties, and requests, obtains and uses personal information only to the extent

necessary for the effective management of its operations and in strict compliance with current data protection laws and regulations.

Furthermore, the University asks its Collaborators to protect and keep their personal data and the personal data of other employees and third parties confidential at all times.

The aforementioned undertakings and conditions do not in any way limit the authority of Humanitas University to investigate wrongdoing, or alleged wrongdoing, by Collaborators and/or third parties.

## **5.8. PROCESSING THE PERSONAL DATA OF DATA SUBJECTS**

**Data relating to data subjects must be processed according to company rules in compliance with the provisions of the General Data Protection Regulation 2016/679.**

By virtue of their professional role and within the limits of the relative functions assigned within Humanitas University, with reference to the internal procedures governing this relationship, Collaborators may have access to personal data for which Humanitas University is the Data Controller (such as students and university staff).

Consequently, without prejudice to the assigned duty within the company, appropriate instructions have been provided regarding conduct.

In particular, in order to guarantee maximum confidentiality and data security, each Collaborator undertakes, inter alia, to:

- access only those personal data whose processing is strictly necessary to fulfil their functions and, in any case, to process them within the limits of the company's objectives and operational requirements related thereto;
- adhere scrupulously, when processing personal data, to the specific instructions and directions given;
- safeguard the personal data subject to processing with the utmost professional diligence and under their own direct responsibility, storing them and returning them at the end of the operations in order to prevent their being known by unauthorised persons; therefore, in the event of removal, even temporary, from the workplace, the Collaborator must ensure that third parties, even if themselves Humanitas University Collaborators, cannot access the personal data for which processing of any kind is underway, whether on paper or automated;
- not use the data or dispose of them for purposes other than those pertaining to each Collaborator's assignment, and this even after termination, for whatever reason or title, of the employment relationship with Humanitas University;

- transmit personal data outside Humanitas University only where expressly permitted, in compliance with the instructions given and taking all appropriate measures to guarantee the confidentiality of such data;
- take all necessary precautions to ensure the secrecy of the confidential component of their authentication credentials;
- deactivate their user account during breaks or prolonged absences and avoid leaving free access to their work session (e.g. system log-off, screensaver with password in an area where access is shared with external parties, PC lock, etc.).

**Violation of these obligations and of the provisions laid down in the *Rules for the use of IT or network resources*, delivered to every Collaborator and available in the network folder accessible to all Collaborators, could lead to disciplinary consequences and in the most serious cases to criminal consequences, even following merely negligent conduct.**

Humanitas University carries out periodic checks and controls in order to ensure the strict application of current legislation on the protection of personal data and the proper compliance with the objectives and procedures of personal data processing.

## **5.9. USE OF INSIDE INFORMATION**

**The use of inside information is strictly prohibited.**

No person to whom this Code applies may, when in possession of inside information, buy, sell or otherwise engage in transactions involving the financial instruments of any other company that has relations with Humanitas University.

In addition, no relevant information that is not in the public domain must be disclosed to third parties, directly or indirectly, concerning their own company or any other company to which they have had access in the performance of their work, and teaching and learning activities.

Violation of the provisions contained in this article will lead to the application of any disciplinary sanctions provided for in the current legislation, as well as further legal action against the persons involved.

Persons to whom the Code applies who invest in securities must be aware of the laws that restrict their ability to trade in securities or provide inside information to third parties.

## **5.10. USE OF TECHNOLOGICAL RESOURCES**

**Hardware and software resources must be used only for university business, research, study or other expressly authorised uses. The use of unlicensed software is strictly prohibited.**

Persons to whom the Code applies may not use equipment, systems or technological devices for any purposes other than those expressly authorised by the company.

The use of software programs that do not comply with official standards is not permitted, unless authorised in writing by the CEO. It is forbidden to introduce illegal copies of software into the University's computer system.

Persons working with technological resources must be aware of the restrictions on use and must act in such a way as not to violate user licences or perform acts that entail liability for Humanitas University.

Technological resources must be used pursuant to current regulations and according to the procedural and operational rules established by the relevant departments.

## **5.11. INTERNAL CONTROLS**

**All Collaborators are responsible for the implementation and proper functioning of internal controls within their respective functions.**

It is the policy of Humanitas University to disseminate, at every level of its structure, a culture based on awareness of the existence of controls and a proactive attitude to such controls. It is necessary to adopt a positive attitude towards such controls in order to improve their efficiency.

Internal controls are all those instruments that are necessary or useful for directing, managing or verifying the company's activities; their objective is to ensure compliance with company regulations and procedures, protect University property, manage activities efficiently and set up an accurate and complete accounting system, in order to prevent unlawful conduct.

The responsibility for the implementation of an efficient internal control system lies with all levels of the organisation.

Within the scope of their respective functions, all Humanitas University Collaborators are responsible for the definition and proper functioning of internal controls, aimed at pursuing a common objective, i.e. the *reasonable assurance* of effective corporate "good governance", characterised by the presence of ethically correct conduct.

## **5.12. RECORDING AND ACCURATE ARCHIVING**

**Accounting records must always be true, transparent, timely and complete.**

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Humanitas University undertakes to comply with all applicable laws and regulations for the conservation of documents that constitute official records. In their respective functions, all Collaborators are responsible for creating and maintaining records accurately and storing them according to applicable laws and regulations and Humanitas University policies and procedures.

The balance sheets, accounts and financial statements must give a true and fair view of the Company's assets, liabilities, profit and loss and financial position. It is the policy of Humanitas University that:

1. the books and records reflect transactions according to recognised methods of reporting economic events;
2. misrepresentation, concealment, falsification, circumvention and other deliberate actions that result in inaccurate books and records are illegal activities and will not be tolerated;
3. transactions must be properly reflected in the books and records of Humanitas University so that financial statements can be prepared according to appropriate accounting standards;
4. each entry must be supported by adequate, clear and complete documentation and must be archived in order to allow a check, at any time, on the reasons for and characteristics of the entry and the exact identification of who, at the various stages, authorised, performed, recorded and verified it;
5. documentation must be easily traceable and filed according to logical criteria.

The term "entry" is broad and includes virtually any form of information created or stored by Humanitas University. Under no circumstances may the University's records be kept outside the Company's facilities or designated archives.

### **5.13. INTELLECTUAL PROPERTY RIGHTS AND COPYRIGHT**

**Ownership of intellectual property rights and copyright developed in the work environment is restricted to the University**, which retains the right to use such inventions in the manner and at the times it deems most appropriate, according to current legislation.

Persons to whom this Code applies must respect the copyrights relating to the plans, texts, systems, processes, methodologies, studies, reports, projections or any other activities granted for use. Ownership of intellectual property extends to plans, systems, procedures, methodologies, studies, reports, projections or any other activity developed by or on behalf of the University.

In general, the guidelines for the generation, management and exploitation of intellectual property generated within Humanitas University by University Collaborators are subject to the *General Regulations governing the generation, management and exploitation of intellectual property in Humanitas University*, referred to herein in full.

Furthermore, the Code of Conduct in Research, in force at the University, is hereby referred to in full.

#### **5.14. STUDY, RESEARCH AND WORKING ENVIRONMENT**

##### **Humanitas University prohibits discrimination in the treatment of staff.**

All individuals interested in the study and research activities conducted by the University may aspire to access Humanitas University degree programs, and research doctorates and projects, provided they meet the necessary requirements.

All persons may aspire to be recruited to Humanitas University or to be considered for a new position solely on the basis of service requirements, scientific and academic objectives and merit criteria, without arbitrary discrimination.

All persons to whom this Code applies at any level and in any capacity shall cooperate to maintain a climate of mutual respect in the face of personal differences.

#### **5.15. HUMANITAS UNIVERSITY PROMOTES A RESPECTFUL, HEALTHY AND SAFE WORKING ENVIRONMENT**

In compliance with the regulatory framework and guidelines aimed at creating a healthy and safe working environment, Humanitas University is committed to ensuring a healthy and safe working environment, by monitoring, managing and preventing risks related to the performance of professional, research and study activities.

Humanitas University **prohibits discrimination in the treatment of any person collaborating with the University**. The organisation of study, research and work activities will therefore be aimed at avoiding any situation of organisational constraint and/or psychological violence, according to current regulations.

Humanitas University is particularly respectful of the laws governing human rights and labour.

Humanitas University manages its Collaborators in an objective manner, offering equal opportunities, without any political, trade union, religious, racial, language or gender discrimination, in compliance with current laws, regulations and directives.

Humanitas University condemns any form of violence or harassment that is sexual or relates to personal and cultural diversity. Behaviour or expressions that may offend

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a person's sensitivity must also be avoided. Humanitas University will not tolerate any form of abuse, coercion, bullying or harassment of a sexual, physical, psychological or other nature.

## **5.16. COMMUNITY RELATIONS**

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

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

All Collaborators must comply with the laws and regulations governing relations with public administration officials.

Relations with the public administration, including the bodies and agencies of the European Union, must be characterised by a sense of responsibility, fairness and a spirit of collaboration.

## **5.17. HUMANITAS UNIVERSITY PROMOTES COMPLIANCE WITH ENVIRONMENTAL REGULATIONS**

Compliance with statutory and regulatory provisions also extends to regulations concerning environmental protection and the rational use of natural resources.

Humanitas University complies in form and substance with applicable environmental laws and regulations and expects all employees to do the same.

Humanitas University is committed to, and requires all employees to commit to, reducing the environmental impact of its operations, for example through the effective use of resources and the careful handling of hazardous substances and waste.

## **5.18. VALIDITY**

This revised version of the Code of Ethics is valid from 24/03/2020 and, from this date, completely replaces the previous versions.