



# **UNIVERSITA' VITA-SALUTE SAN RAFFAELE**

## **CODE OF ETHICS**

**APPROVED BY THE BOARD OF DIRECTORS ON 25 NOVEMBER 2019**

**UNIVERSITA' VITA-SALUTE SAN RAFFAELE**

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## 1. INTRODUCTION

### 1.1. UNISR

The University opened its doors in 1996 with the Faculty of Psychology, followed by the Faculty of Medicine and Surgery in 1998 and the Faculty of Philosophy in 2002.

UniSR is an independent university established under art. 33 of the Italian Constitution; it is a legal person and enjoys educational, academic, organisational, administrative and disciplinary autonomy under its statute and in accordance with the principles contained in the laws governing universities. UniSR is maintained by the fees, contributions and charges paid by students, and all the assets and funds donated or assigned to it in any way.

### 1.2. SCOPE AND PURPOSES OF THE CODE OF ETHICS

This Code of Ethics (hereinafter the “**Code**”) constitutes an integral part of the Model of Governance compliant with Italian Legislative Decree no. 231 of 8 June 2001 (hereinafter the “**Model**”) adopted by UniSR, and states the ethical principles and values with which UniSR conforms in respect to anyone using its services and/or working with it. The aim of the Code is to recommend, encourage or forbid specific behaviours, in accordance with and addition to the legal provisions.

By this Code, UniSR:

- defines and disseminates the ethical principles which inform its activity in relations with the Addressees (as defined below);
- states the ethical principles with which Addressees (as defined below) are required to comply,
- with the aim of also encouraging and promoting a high standard of quality and

professionalism.

In particular, the Code:

- sets out the principles and rules of behaviour which UniSR considers to have positive ethical value, with the aim of directing its activities and those of the Addressees (as defined below) towards legality, efficiency, transparency, competence, integrity and honesty;
- recommends, encourages or forbids specific conducts and/or behaviours, above and beyond the provisions of the law.

Therefore, the University's governance bodies, employees and teaching staff, all those in any way involved in research activities on UniSR's behalf, students, candidates and partners, and

all those working under its mandate or who have collaboration or consulting relations with it (jointly, the "**Addressees**") are obliged to comply with the principles set forth in this Code, and embody them in their routine practices.

Under UniSR's statute, its main purpose is to promote the knowledge of Man, in his biological-intellectual-spiritual components by way of the teaching and study of various disciplines.

In this context, the Code also represents the measures UniSR intends to adopt in the area of ethics and conduct in order to ensure that its organisation complies with the requirements of the aforesaid Legislative Decree no. 231 of 8 June 2001 (hereinafter the "**Decree**") and to establish the lines of conduct to be followed, inside and outside UniSR, in the pursuance of its institutional objectives and the achievement of its goals.

The Code comprises:

- general principles, meaning the values considered to be fundamental, adopted and recognised by UniSR for the success of its mission, on which all Addressees are required to base their activities;
- criteria of conduct for each class of Addressee, which provide the guidelines and regulations with which they are required to comply to ensure adherence to the general principles and to prevent the risk of unethical behaviours;
- implementation procedures, which describe the control system for compliance with the Code and for its continual improvement.

### **1.3. ADDRESSEES OF THE CODE OF ETHICS**

All Addressees are required to comply with and adhere to the ethical principles and rules of behaviour contained in this Code.

In order to ensure the efficacy of the Code, UniSR undertakes:

- to run suitable training and awareness-raising programmes with regard to the contents of the Code;
- to ensure the timely dissemination of the Code to the Addressees;
- to regularly check compliance with and adherence to the Code;
- to ensure regular reviews and updates, so that the Code responds to any changes in the UniSR organisational or management structure, and evolutions in public opinion and environmental and regulatory conditions;
- to adopt suitable preventive tools and implement suitable disciplinary measures, ensuring their timely application in case of proven breach of the provisions of the

Code.

#### **1.4. PUBLICISATION OF THE CODE**

This Code is publicised through:

- the inclusion of an up-to-date version, constantly available on the Intranet and Internet;
- posting and provision in workplaces by the procedures envisaged by art. 7 of the Italian Workers' Statute (law n. 300 of 20 May 1970).

#### **1.5. AMENDMENTS/UPDATES**

UniSR may amend and/or update the Code at any time in response to changes in circumstances and the operating context, or its own concrete requirements.

### **2. GENERAL PRINCIPLES**

#### **A. LEGALITY**

In the conduct of its activities, UniSR acts in compliance with current laws, internal directives and regulations, national and international regulations, and the contents of this Code.

It is in the overriding interest of UniSR for its institutional goals to be pursued in accordance with the entire regulatory framework.

#### **B. HONESTY AND INTEGRITY**

UniSR grounds its operations and internal and external relations on principles of integrity, transparency, loyalty, collaboration and mutual respect.

Under no circumstances may the pursuance of UniSR's interests justify conduct which is not honest and does not comply with the aforesaid principles of integrity, transparency, loyalty, collaboration and mutual respect.

#### **C. RESPECTABILITY**

UniSR refuses to enter into relationship with entities which do not satisfy the required standards of respectability or which are of doubtful or uncertain moral integrity.

#### **D. TRANSPARENCY AND PROFESSIONALISM**

UniSR conducts its activity in compliance with the principle of transparency and

professionalism, the latter in the sense of a commitment to fulfilling the tasks and responsibilities assigned diligently and in a manner appropriate to their nature.

#### **E. EQUALITY AND NON-DISCRIMINATION**

UniSR recognises the equal dignity of all those involved in its activities and does not discriminate on the basis of religious beliefs, political opinions, personal and social status, gender, sexual orientation or ethnicity.

Aware of its function, UniSR promotes integration and dialogue between people and between different traditions and cultures, on the basis of fair treatment and respect for all individuals.

#### **F. FAIR EXERCISE OF AUTHORITY**

In the management of relations which imply the creation of hierarchical relationships, UniSR is committed to ensuring that authority is exercised fairly and ethically, avoiding all abuse of power.

In particular, UniSR ensures that authority is not transformed into the exercise of power in a manner harmful to the dignity and autonomy of others, and that work is organised in a way which safeguards the skills and human rights of the Addressees.

#### **G. AUTONOMY AND DEMOCRACY IN DECISION-MAKING PROCESSES**

UniSR's decision-making process and governance systems comply with the principles of autonomy and democracy as defined by law and by the University's statute and regulations. Autonomous decision-making is achieved when the goals and rules of UniSR reflect the wishes of the university community, as expressed by the representative bodies.

#### **H. PERSONAL SAFETY**

UniSR guarantees the physical and moral safety of Addressees, ensures working/service/study conditions that respect personal dignity and the behavioural rules of good manners at the deepest level, and provides safe, healthy working/study/research environments. UniSR also acts to prevent bullying, mobbing and/or stalking in the workplace. UniSR does not tolerate demands or threats intended to force people to act against the law and the Code, or to behave in ways in conflict with their individual moral convictions and preferences.

## **I. SEXUAL AND PSYCHOLOGICAL ABUSE**

UniSR does not tolerate sexual and psychological abuse or molestation and guarantees timely protection for victims.

Examples of sexual abuse or molestation include requests or suggestions of favours or acts of a sexual nature and/or conduct or expressions directed at the sexual life of one or more persons with offensive or derogatory intentions. The sexual and psychological abuse is aggravated if the perpetrator has taken advantage of their role within the organisation.

## **J. RESPECT FOR HUMAN RESOURCES**

UniSR values the abilities and talents of its human resources and aims to ensure their human and professional growth by encouraging the development of their skills, their involvement in decision-making processes, their capabilities for mutual cooperation, and an attitude of reciprocal cooperation and joint responsibility towards the organisation of which they are all an integral part.

## **K. MERIT**

UniSR recognises and promotes individual merit as an essential criterion for human and professional promotion. UniSR considers the cultivation of individual talents and merit - through both single activities and teamwork - as factors for growth, development and competitiveness, to the benefit of the entire community.

## **L. HEALTH AND SAFETY**

In the context of current occupational health and safety legislation, UniSR adopts all measures necessary to safeguard the mental, physical and moral well-being of all those who work or spend time in the University's locations and facilities for any reasons.

Occupational health and safety protection therefore also applies to persons belonging to external contractors working within the University.

Each for their own area of competence, Addressees are required to ensure full compliance with legal requirements, the principles of the Code, internal procedures and any other provisions enforced to ensure the protection of occupational health and safety.

## **M. "COMPANY" PROPERTY**

Every Addressee is required to adopt due diligence to protect UniSR's resources through

responsible behaviours in line with the operating procedures established to regulate their use.

In particular, every Addressee must use the resources assigned for which they are responsible with the greatest care, avoiding misuses which may cause damage or which may be in conflict with UniSR's interests and/or its founding principles.

No misuse of "company" property in order to obtain unauthorised benefits is permitted: UniSR has a zero tolerance policy with regard to fraud, theft, or losses due to negligence or waste.

## **N. PROTECTION OF THE UNIVERSITY'S REPUTATION AND IMAGE**

UniSR requires all Addressees to protect the University's reputation and prestige and not to engage in behaviours which may be harmful to its image. The use of the UniSR name and logo for non-institutional purposes or by procedures not approved by the University regulations is not permitted.

Members of the University community may not issue public declarations in the University's name, on any media, except in the cases envisaged by the current regulations or with specific authorisation. They may not express strictly personal opinions in the name of UniSR. Members of the University community must use all communication media ethically and with respect for the University and personal data protection, never disseminating information, texts or images which may be harmful to the reputation and prestige of UniSR.

UniSR requires all members of the community to behave with respect for the University's prestige and image and constitutional freedoms, even when using social media.

With regard to social media, when using their own private accounts Addressees are required, for everything regarding or affecting UniSR, to comply with the rules of behaviour in force at the time within UniSR, and to use the aforesaid IT tools with diligence, caution and common sense in compliance with the UniSR values, in order to safeguard the image of the latter.

No form of publication and/or communication regarding UniSR by the Addressees on social media or instant messaging apps fulfilling a similar function, which may be harmful to the University's image or prestige, or which may be considered potentially harmful even with explicit reference to UniSR, will be tolerated.

Nor will there be any tolerance of publications and/or communications via the aforesaid channels relating to behaviours and/or habits current in UniSR which may be considered harmful to the image of any professionals who work there in any capacity (as employees,



freelancers or external consultants).

#### **O. INTELLECTUAL PROPERTY AND COPYRIGHT**

Addressees are required to comply with the laws governing intellectual property and copyright in practice and not merely on paper. The author of any discovery belonging to UniSR shall not make use of it for private purposes and shall treat its results as confidential until the time of their official publication.

In view of the social importance of scientific research, UniSR believes that its results must contribute to the development and prosperity of the community as a whole.

#### **P. CONFLICT OF INTEREST**

Conflict of interest includes every circumstance arising from the discrepancy between actions undertaken in the interest of UniSR and a single individual's personal interest. It also occurs whenever there is the unlawful expectation of receiving a direct or indirect benefit for an institutional task or activity.

Conflict of interest arises whenever the private interest of a member of the University community actually or potentially contrasts with the economic and other interest of UniSR itself. UniSR must adopt the most appropriate measures to avoid all situations or relationships which may lead to a conflict of interest.

Whenever the members of UniSR become aware of a situation of this kind, they must take all appropriate measures to resolve any real or potential conflict.

Moreover, any form of nepotism or favouritism which may enable a person's advancement regardless of their individual merits, professionalism and qualifications, in breach of principles of fairness, justice and impartiality, is forbidden.

#### **Q. RESEARCH AND TEACHING**

UniSR believes that the openness of the results of research and teaching is a primary value, and embraces the principles of open access to scientific literature.

UniSR considers excellence in research and the application of discoveries as fundamental for the progress of society and the improvement of quality of life. Members of the University community share the aim of managing research results, intellectual property and technology transfer in the public interest. This aim is pursued in institutional activities, in cooperation with public and private organisations, and during the extra-institutional

scientific and academic activities inherent in individuals' roles.

The rights to the economic exploitation of patents and other intellectual property rights are held by UniSR and/or the individual inventors as envisaged by law.

UniSR promotes the exploitation and management of intellectual property in agreement with inventors and in accordance with the fair recompense due by law.

## **R. RESPONSIBLE CONDUCT DURING RESEARCH**

During research activities, members of the University community are obliged to ensure that their conduct is ethical and responsible, through the adoption of self-disciplinary practices or procedures intended to illustrate the method adopted, the results and the relative ethical impact to the scientific community.

Research must be carried out in full compliance with the standards and principles established by the *"European Code of Conduct for Research Integrity"*, to which explicit reference is made.

It is the duty of UniSR to respect and safeguard all those involved in ethically sustainable research activities, who are also required to conform to ethical conduct, especially during the performance of basic and animal trials.

## **S. TRANSPARENT, TRUTHFUL, COMPLETE, ACCURATE INFORMATION**

UniSR promotes transparent, truthful, complete verbal and written information, in order to establish clear, comprehensible relationships and enable its counter-parties to take independent, well informed decisions.

When preparing communications, reports and alerts addressed to Public Authorities and the Addressees, UniSR complies with principles of transparency, truthfulness, completeness and accuracy, in order to ensure full compliance with the regulatory framework.

UniSR forbids: **(i)** the statement of untrue material facts; **(ii)** the omission of information the disclosure of which is required by law, regarding the economic, capital or financial standing of UniSR; **(iii)** the concealment of data or information with the intention of misleading their recipients; **(iv)** the hindering or obstruction, in any way, of the inspection activities assigned by law to the other governance bodies or the competent authorities.

## **T. RELATIONS WITH THE JUDICIAL AUTHORITIES**

UniSR's relations with the Judicial Authorities are based on the provision of truthful, complete,

accurate information in all forms.

#### **U. GIFTS, GRATUITIES AND BENEFITS**

No form of gift which may even only be interpreted as exceeding normal business practices or courtesy, or as being in any way intended to obtain favourable treatment in the conduct of any activity which may be connected to UniSR, is permitted.

In particular, any form of gift to Italian or foreign public servants, UniSR directors, auditors or their relatives, which may affect their independence of judgement or persuade them to provide any advantage, is forbidden.

This provision, which may never be waived, refers both to gifts promised or offered and those received, and "gift" signifies any type of benefit.

In all cases, UniSR does not engage in practices not permitted by law, business practices or the codes of ethics of the institutions, businesses or organisations with which it conducts relations.

UniSR gifts have the sole purposes of promoting the University's image.

All gifts offered - except those of low value - must be managed and authorised in accordance with the Model procedures and must be suitably documented.

#### **V. PROCESSING OF PERSONAL DATA**

All personal data "at the disposal" of UniSR are processed in accordance with the provisions of Italian Legislative Decree no. 196 of 30 June 2003, as amended (hereinafter the "**Data Protection Code**"), and Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016 on the protection of natural persons with regard to the processing of personal data and on the free movement of such data, abrogating Directive 95/46/EC (hereinafter "**Regulation 679**"), for compliance with any legal obligations, contractual obligations, EU regulations and/or Data Protection Supervisory Authority measures, in accordance with principles of lawfulness, fairness, transparency, limitation of purposes and storage, minimisation of data, accuracy, integrity and confidentiality, with the adoption for this purpose of adequate data security and protection measures, including, if appropriate, sensitive, biometric and genetic data, or other data which reveal the state of health of the data subject, as defined by the Data Protection Code and Regulation 679.

#### **W. WHISTLEBLOWING**

UniSR establishes suitable communication channels to protect the identity of everyone who submits justified reports of conducts which constitute criminal offences or violations of the Model, which have come to their knowledge by reasons of the functions they fulfil within/for UniSR.

## **X. PROTECTION OF IT SYSTEMS**

With regard to its areas of competence, UniSR protects IT systems, forbidding illegal access to them and working to reduce the risk of damage to or loss of data; also in fulfilment of the requirements of the Data Protection Code and Regulation 679/2016.

## **Y. ENVIRONMENTAL PROTECTION**

The environment is an asset of primary importance to the community, and UniSR is committed to protecting it; therefore UniSR makes a constructive contribution to environmental sustainability in all its activities, with a view to the rights of future generations. The concept of sustainable growth thus coincides with that of the eco-compatibility and safety of the activities undertaken: this implies both environmental protection and risk management, to guarantee the health and safety of all UniSR staff and anyone involved in its activities.

## **3. RULES OF CONDUCT**

Implementing the principles of the Code, Addressees must:

- comply with current law and the measures adopted by the competent Authorities in relation to UniSR;
- take all necessary measures to prevent the violation of UniSR's ethical principles and exercise vigilance with regard to compliance with them;
- abstain from unlawful or unethical behaviours;
- protect and respect human resources, providing equal opportunities for human and professional growth, and working conditions that respect individual human rights;
- abstain from pursuing their own or third-party interests to the detriment of those of UniSR.

### **3.1. CRITERIA OF CONDUCT IN RELATIONS WITH EXTERNAL ENTITIES**

### **3.1.1. RELATIONS WITH POLITICAL ORGANISATIONS, TRADE UNIONS AND OTHER ASSOCIATIONS**

UniSR does not fund Italian or foreign political parties or their representatives or candidates, or sponsor congresses or social events for the sole purpose of political propaganda, and nor does it apply any direct or indirect pressure on politicians or sponsor organisations with which there is a potential conflict of interest.

### **3.1.2. INSTITUTIONAL RELATIONS**

Relationships with institutions consist only of forms of communication which enable assessment of the implications of legislative and administrative actions for UniSR, reply to formal requests and inspections, or state positions on topics of importance to UniSR.

For the above purposes, UniSR undertakes, without any type of discrimination, to establish permanent channels for communication with international, EU and national institutional counter-parties and to represent UniSR's interests and positions with transparency, rigour and consistency, avoiding all forms of collusion.

To ensure the utmost clarity and transparency in relationships, all contacts with institutional counter-parties take place through representatives specifically mandated by UniSR at the highest level.

### **3.1.3. RELATIONS WITH THE PUBLIC SECTOR**

Relations with the Public Sector are conducted by persons mandated for these purposes by the highest levels within UniSR or authorised by reason of the roles actually fulfilled at UniSR. Conduct in relation to the Public Sector is based on principles of the maximum integrity, transparency and consistency.

No forms of pressure of any kind on the counter-party's decision-making intended to influence decisions in UniSR's favour, or to demand or obtain favourable treatment, are permitted.

The misleading or deception of central government authorities or other public sector bodies with the aim of obtaining unlawful gain for UniSR at the expense of others is specifically forbidden; the unlawful gain may be indirect and may also include grants, funding or any other form of payments. The following are also absolutely forbidden:

- i) using or presenting false or untruthful declarations or documents, or failing to report relevant information, in order to obtain unlawful benefits (such as, but not limited to,

grants, funding or other forms of payment from central government authorities or other public sector bodies, authorisations or concessions);

- ii) the use of grants, funding or other payments received from central government authorities or other public sector bodies for projects other than those for the realisation of works or the running of activities in the public interest for which they were awarded.

Any other activity, direct or through intermediaries, intended to interfere with independence of judgement is also forbidden.

Any Addressee who directly or indirectly receives the offer of benefits from public officials, persons appointed to supply public services, or equivalent public sector employees of any kind, must report the matter at once to the internal body tasked with supervising the application of this Code.

### **3.2. CRITERIA OF CONDUCT IN RELATIONS WITH EMPLOYEES (TECHNICAL-ADMINISTRATIVE STAFF)**

UniSR assigns the greatest importance to its human resources.

Therefore, UniSR contributes to the training and growth of its employees, enhancing their skills and potentials and rewarding their commitment through objective, impartial assessment criteria.

UniSR does not tolerate any form of discrimination on the basis of physical condition, political opinions, nationality, region, gender or sexual orientation. Favouritism, clientelism and nepotism are not permitted.

### **3.3. CRITERIA OF CONDUCT IN RELATIONS WITH TEACHING STAFF AND PERSONS IN ANY WAY INVOLVED IN RESEARCH ON BEHALF OF UNISR**

UniSR views the professionalism of teaching staff and persons in any way involved in research on its behalf as crucial.

Therefore, UniSR adopts all measures considered necessary to ensure that teaching staff and persons in any way involved in research on its behalf work to the highest standards.

UniSR supports the studies and research of teaching staff and persons in any way involved in research on its behalf and guarantees the widest possible participation in selection procedures for academic posts.

### **3.4. CRITERIA OF CONDUCT IN RELATIONS WITH STUDENTS**

UniSR pursues the following goals in its relations with students:

- to offer and deliver an educational/cultural offering of a high quality standard;
- to satisfy students' demands by constantly improving the quality of the services offered;
- to establish a relationship with students based on mutual trust and cooperation and inspired by professionalism, honesty, fairness, transparency, willingness to help, respect and courtesy.

In relations with students, every Addressee must:

- base their conduct on respect for hierarchies and the respective roles, in accordance with the principles of ethics and moral integrity embraced and promoted by UniSR, as well as principles of professionalism, honesty, fairness, transparency, willingness to help, respect and courtesy, with no over-familiarity;
- work to ensure the maximum student satisfaction, also by supplying truthful, complete accurate information about the products and services supplied to students, to enable them to make well-informed choices;
- ensure equal treatment of students and avoid unfair discrimination on the basis of physical condition, political opinions, nationality, religion, gender and sexual orientation. Favouritism, clientelism and nepotism are not permitted;
- deliver high quality services.

### **3.5. CRITERIA OF CONDUCT IN RELATIONS WITH GRADUATES**

UniSR offers graduates a placement service through specific channels, within the limits of current legislation and the relevant internal procedures.

Placement services are provided in accordance with principles of meritocracy, non-discrimination, objectivity and transparency.

### **3.6. CRITERIA OF CONDUCT IN RELATIONS WITH CANDIDATES**

UniSR guarantees the broadest participation in selection procedures for admission to academic courses.

Candidates are selected in accordance with current regulations and the internal procedures adopted by UniSR, based on principles of meritocracy, non-discrimination, objectivity and transparency.

In relations with candidates, every Addressee must:

- base their conduct on principles of professionalism, honesty, fairness, transparency, willingness to help, respect and courtesy;
- provide truthful, complete, accurate information;
- abstain from discrimination on the basis of physical condition, political opinions, nationality, religion, gender and sexual orientation;
- deliver high quality services.

### **3.7. CHOICE OF PARTNERS**

When choosing the entities with which to establish partnerships, UniSR rejects all forms of internal or external pressure intended to influence its decisions against its own interests or the principles of integrity and transparency set forth in the Code.

### **3.8. CRITERIA OF CONDUCT IN RELATIONS WITH SUPPLIERS/CHOICE OF SUPPLIERS/CONSULTANTS**

In relations with suppliers/consultants, UniSR applies the same principles as in relations with partners, choosing companies/consultants committed to implementing current legislation on environmental protection, occupational health and safety, personal data protection and fiscal and welfare compliance.

Suppliers/consultants are also selected on the basis of the ethical principles set out in this Code, and any behaviour not compliant with or violating the principles of the Code by a supplier is reported without delay.

#### **3.8.1. PURCHASES**

Purchasing processes are intended to achieve the greatest economic benefit: they are also based on behaviours intended to ensure the essential, reciprocal good faith, transparency and cooperation.

In particular, no-one who meets the stated requirements must be precluded from competing for contracts, and candidates must be selected on the basis of objective, transparent criteria, always ensuring a satisfactory degree of competition by inviting a suitable number of businesses to bid.

In all cases, if a supplier engages during the conduct of its activities in behaviours not in line with the general principles of this Code, UniSR is entitled to take suitable measures, up to and including ruling out further collaboration.



### **3.9. CONTRACTS**

The contracts to which UniSR is a party are:

- clear and simple, drawn up in a language as close as possible to that normally used by the parties;
- compliant with current legislation, without recourse to any evasive or unethical practices;
- complete, so that no significant factors are overlooked.

### **3.10. COMMUNICATIONS**

On each occasion, depending on the purposes and recipients of communications, the contact channels chosen will be the most suitable for the transmission of the relevant contents without excessive pressure or stress. The University is committed to not using misleading or untruthful advertising tools.

## **4. IMPLEMENTATION PROCEDURES**

### **4.1. BREACHES OF THE CODE AND DISCIPLINARY MEASURES**

Any breach of the provisions of this Code will be punished by application of the measures envisaged by the Disciplinary System adopted by UniSR and referred to in the Model.

Compliance with the provisions of the Code is to be considered an essential part of the obligations entered into by Addressees.

Therefore, any breaches by the Addressees may constitute default on the primary obligations of the relative relationships, or a disciplinary offence, with all the relevant legal consequences, also with regard to continuation of the relationship, and may lead to compensation of the damages caused.

The parties concerned may report any breach and/or suspected breach of the Code, in writing and in non-anonymous form, to the Supervisory Body, which will swiftly examine the report and if necessary interview its author and the person charged with the claimed breach.

The Supervisory Body takes measures to protect whistle-blowers against any type of revenge, in the sense of actions which may give rise to even merely the suspicion of any form of discrimination and penalisation. The whistle-blower's identity is also treated as strictly confidential, subject to compliance with legal obligations.

## **5. CONCLUDING REGULATIONS**

The specific provisions of this Code are examples of the most recurrent forms of behaviour and do not limit the context of application of the general principles set forth.

If even just one provision of the Code conflicts with any other provision of internal regulations or procedure, the provisions of the Code shall prevail.