



**ISTITUTO
ITALIANO DI
TECNOLOGIA**

CODE OF CONDUCT AND SCIENTIFIC CONDUCT

Of the Istituto Italiano di Tecnologia Foundation

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TABLE OF CONTENTS

Foreword.....	4
GENERAL PRINCIPLES	4
Compliance with Laws and Regulations.....	5
Compliance with company procedures.....	5
Compliance with powers of attorney and mandate	5
Legitimacy and fairness.....	5
Diligence	5
Relations with supervising Ministries, public supervisory authorities, inspection bodies and institutions in general.....	6
Work and economic relations with third parties	6
SECTION I - RULES OF CONDUCT	7
Gifts and free services.....	7
Financing of doctorate scholarships	7
Protecting the assets of the Foundation.....	8
Use of confidential information.....	8
Communication within IIT	9
Relationships between employees, collaborators and consultants.....	9
Transparency of accounts and corporate communications	10
Health and Safety at work	10
Illegal Immigration.....	11
Environment and protection of animal species.....	11
Compliance and ethics relating to money	11
Computer Security	11
Protection of copyright.....	12

Possession of pornographic material.....	13
Internal Audits	13
SECTION II - GUIDELINES ON SCIENTIFIC CONDUCT	14
DEFINITIONS	14
General principles	14
Authorship's moral rights.....	15
Collegiality in Research.....	15
Storage of data and Databases	15
"Resignation" of a Researcher.....	15
Responsibilities of Researchers after "Resignation" from the group	16
Supervision in Research	16
SECTION III - PRINCIPLES OF CONFLICT OF INTEREST.....	17
Duty of non-competition.....	17
Duty of abstention.....	17
Duty of transparency	18
Related Activities	19
Memberships in associations and organizations	19
Reports and information.....	19
Ethics Committee	19
SECTION IV - REPORTING VIOLATIONS OF THE CODE IN CASES OF SCIENTIFIC OR BEHAVIOURAL MISCONDUCT	20
General principles.....	20
Responsibility of Reports.....	20
Evaluation of Reports.....	20
Confidentiality.....	21

Foreword

Istituto Italiano di Tecnologia (hereinafter referred to as the "Foundation" or "Institute" or "IIT ") has deemed it appropriate to establish a set of rules which are set out in this code of conduct and of scientific conduct (hereinafter the "Code "), divided into four sections: (i) general principles of behaviour also for the purposes of *Modello di Gestione, Organizzazione e Controllo* pursuant to Legislative Decree 231/2001 (hereinafter the Model); (ii) guidelines for scientific conduct, (iii) principles relating to conflict of interest, (iv) the procedure for reporting violations of the Code.

The Code sets out the general principles and guidelines to be followed by all those who for various reasons relate to the Foundation (the "Recipients").

This Code complements and does not replace the provisions set out in previously provided policies and procedures.

Any changes and/or additions to this Code must be made using same methods adopted for its approval.

Recipients of the Code are:

- the members of the Council;
- the members of the Executive Committee, the General Director and the Directors of the Research Unit;
- employees, collaborators, and consultants, each in respect of the contractual nature of the relationship with the Foundation and in line with the level of autonomy of the respective responsibilities;
- third parties who maintain contractual relations with the Foundation which differ from those listed above.

Recipients are required to comply with the provisions of this Code to enable the Foundation to operate smoothly and further strengthen its reliability and reputation.

GENERAL PRINCIPLES

Recipients of this Code are required to:

- operate with honesty and integrity in doing business among themselves, with Public Authorities, institutions, suppliers, individuals, institutions or companies with which the Foundation has contractual or employment relationships;
- observe the provisions of the legal system in which the Foundation operates, in compliance with the procedures, guidelines and information adopted from time to time and published by the Institute;
- avoid conflicts of interest with the Foundation and, at all times, avoid any behaviour resulting in negative publicity for the same.

Compliance with Laws and Regulations

Recipients are committed to complying with the laws and regulations of the states in which the Foundation operates.

Compliance with company procedures

In the performance of their tasks, and compatibly with the respective contractual conditions, Recipients undertake to comply with IIT's statute, internal regulations, Model and policies and procedures where applicable, pursuant to Legislative Decree 231/01.

Compliance with powers of attorney and mandate

Recipients who perform actions on behalf of the Foundation by virtue of mandates or powers of attorney shall act within the limits and in accordance with said powers. They may not, outside of these limits, make commitments on behalf of IIT or pretend to be allowed to do so in the performance of their duties and functions.

Legitimacy and fairness

Recipients agree to perform each task assigned to them, operation and/or transaction in accordance with their respective mandates, powers of attorney and mandates so that it is always possible to carry out checks on the type of transaction/activity, on the reasons that led to the execution of the activity and on the authorization to carry out the execution of such operations/transactions.

Diligence

Recipients with reference to the purchase of goods, services and works on behalf of the Institute, shall undertake to act in accordance with the principles of fairness, affordability, quality and legality and work with due diligence. The selection of suppliers for the Institute must be guided by the maximum competitive advantage for the Foundation ensuring, for all suppliers, impartiality and equal collaboration opportunities.

Relations with supervising Ministries, public supervisory authorities, inspection bodies and institutions in general

Relations with supervising Ministries¹, public supervisory authorities and inspection bodies which may be appointed within the Institute and institutions in general are based on principles of transparency, timeliness, completeness, truthfulness and correctness of information.

Such information cannot be concealed or distorted, in accordance with current legislation, and should be communicated to all of the above.

The Foundation shall not hinder the performance of the functions of the aforementioned authorities. Nor shall it omit, expose in communications, and in the provided documentation facts that are not true or conceal facts concerning its economic and financial situation.

Work and economic relations with third parties

In summary the obligation of loyalty, with respect to the aforementioned duties, involves for each employee that:

- *it is forbidden to sign an employment contract with third parties without the prior authorization of the company/institution to which the employee belongs, save for that provided for by regulations in force;*
- *it is forbidden to carry out activities contrary to the interests of the company/institution or incompatible with the duties of the office, for the performance of which the workers must devote their energies and act according to the terms and in the manner agreed in the employment contract.*

¹

At the date of approval of this document: Ministry of Economy and Finance, Ministry of University and Research.

SECTION I - RULES OF CONDUCT

Gifts and free services

Gifts or free services which may appear howsoever associated with the professional relation with the Foundation must not be offered, given or promised, directly or indirectly to the representatives of Public Authorities.

Offering, Giving or promising gifts or free services to private third parties, in the course of employment, must be considered and assessed with the utmost caution. Even if such gifts or free services are considered customary in terms of interpersonal relationships, they must remain within reasonable limits and have symbolic value.

Gifts or other benefits, therefore, may be made or received only if recognized as acts of mere trade courtesy. These services must not be such as to undermine the integrity and/or business reputation of either party and must not be interpreted, objectively, as aimed at acquiring benefits improperly. At any rate all services described herein shall be in accordance with the internal rules of the Institute, subject to registration and supported by appropriate documentation.

Even in states where it is customary to offer gifts to clients or to other parties as a sign of courtesy, such gifts or promises of gifts must be of an appropriate nature and not conflict with the provisions of the law. They should not, even in this case, be interpreted as a request for favours.

If in doubt you should always consult with your contact or the relevant unit for their prior approval, if necessary.

In the course of employment, no employee or collaborator, either directly or through family members, may request or accept money, gifts and other benefits or promises to do so, - either for themselves or for others - if this may influence, or at least appear to influence their professional decisions. At any rate gifts and favours must not exceed customary limits and must have a symbolic value.

If in doubt, you should consult with the supervisor you directly report to or the relevant unit and as appropriate provide for the return of the gifts which do not comply with the above mentioned characteristics.

Financing of doctorate scholarships

In carrying out its institutional objectives, the Foundation may make use of subjects external to the organization, including but not limited to, students enrolled in doctorate courses. In the case in which there is a specific and concrete interest on the part of IIT to completely or totally finance scholarships, the Foundation will undersign a special agreement with the University in question which will specify that the funding provided by the Foundation directly to the University, according to that provided for and established by the Agreement and, in any case in compliance with the Policies, Procedures and Guidelines of the Foundation.

Protecting the assets of the Foundation

The Foundation's assets consist of physical and intangible assets - the latter being: the result of the work of all employees, collaborators, PhDs and consultants, information of strategic importance and a significant amount of confidential data linked to various research projects handled by employees, collaborators, PhDs and consultants to perform their tasks.

The protection of these assets is essential for the existence and the prosperity of the Foundation. The loss, theft or misuse of such assets may, seriously damage the interests of the Foundation and, more generally, at a higher level the interests of institutional scientific research as a whole.

Every employee, collaborator, PhD or consultant has, therefore, the responsibility to store and protect the assets and tools personally assigned to him/her for his/her job and should help to ensure the preservation of all the assets of the Institute. To this end he/she shall closely observe the operational and safety procedures set out by the Foundation.

At all times, documents pertaining to the activities of the Foundation, work tools and other tangible or intangible properties owned by the Foundation shall be used exclusively for the achievement of the institutional goals of the Foundation and in the manner laid down by it. Employees/collaborators/consultants shall not use them for personal purposes, nor shall they transfer them or make them available, even temporarily, to third parties.

Use of confidential information

Information and confidential documents, personal data of employees and third parties with whom the Foundation has contractual relations, work projects, know-how and technological processes are at all times to be stored and protected in an appropriate manner, by both third parties and colleagues who are not directly involved. The material to which, for business reasons, access is granted must, however, be treated according to the instructions and procedures provided by the Institute.

Employees who become aware of third parties, deliberately or fraudulently, trying to obtain confidential information, either being the recipient of the request directly or otherwise, shall promptly inform the Foundation through their direct supervisor.

In particular, employees not expressly authorized in the manner and under the terms of Legislative Decree 196/2003 concerning the protection of persons and personal information, are forbidden to get knowledge of, record, treat and disclose personal data concerning other employees or third parties.

Those failing to comply with the above will be subject to the administrative and criminal sanctions established by the afore-mentioned legislation, as well as - for employees - to the disciplinary sanctions provided for by the Institute's staff regulation².

Communication within IIT

The Foundation's internal and external communication must be clear, precise and truthful in order to avoid the dissemination of erroneous news or information or the occurrence of situations giving rise to liability of any nature and type for the Institute.

The provision of information to the public must be managed by the offices expressly responsible for this task.

Relationships between employees, collaborators and consultants

The relationships between employees, collaborators and consultants working for the Foundation should always be based on the principles of peaceful coexistence and must be managed in the mutual respect of the rights and freedoms of individuals. In particular, there must be no discrimination or reprisals on the basis of race, religious or political belief, union membership, language and sex ("misconduct").

The term "misconduct" is used to define the act of intentionally offending, humiliating or discriminating against other people.

There is no exclusive or exhaustive description of all the actions that can be carried out to this end. Individual or multiple actions that could arise include but are not limited to:

- racial discrimination;
- gender discrimination;
- religious discrimination;
- sexual harassment;
- bullying.

The relationship between the levels of responsibility relating to the different hierarchical positions existing in the Foundation must be conducted in accordance with honesty and fairness and with due respect for professional confidentiality.

All supervisors shall exercise their powers in relation to the instructions received with objectivity and judicious balance, respecting the dignity of their employees and taking proper care of their professional growth.

All personnel of the various offices, in turn, must fully collaborate with their supervisors or coordinators, so that an accurate and unbiased assessment of their professional performances is possible.

² At the date of approval of this document, the staff regulation applies to all employees of non-managerial level.

Transparency of accounts and corporate communications

The Foundation requires that each operation be properly logged.

Each operation must be supported by suitable documentation so that controls can be made to confirm the nature and reason of the operation identifying who authorized, performed, recorded and checked it.

Financial statements, reports and corporate communications required by law must be drafted in compliance with the provisions of the Italian Civil Code and other accounting principles and with clarity and transparency so as to represent a real and correct view of the assets and financial position of the Foundation.

Book entries are all entries representing numerical operations, including internal expenses. All the staff of the Foundation involved in the process of preparation of the financial accounts shall: i) provide clear and comprehensive information, ii) ensure accuracy of data and date processing, iii) indicate the presence of conflicts of interest.

It is forbidden to hinder or obstruct the smooth conduct of the activities of Foundation bodies and auditors, collaborating, where required, in the performance of any form of control and audit required by law.

In particular, it is forbidden to carry out actions preventing or otherwise hindering control and revision activities through the concealment of documents or the use of other fraudulent means.

Health and Safety at work

IIT has always been committed to the promotion, dissemination and consolidation of safety culture, taking Italian Legislative Decree 81/2008 as the main reference as well as developing in its staff risk awareness and responsible behaviour. The Foundation is committed to preserving the health and safety of its workers as its primary goal is to protect its human, capital and financial resources.

IIT does not accept any compromise regarding of the protection of the health and safety in the workplace.

Recipients must not expose other recipients to unnecessary risks likely to cause damage to their health or physical safety.

All staff working for the Foundation is responsible for the proper management of and compliance with the principles laid down to protect health, safety and environment.

IIT undertakes, to the extent required by local regulations, to maintain a safety-conscious work environment and equip their employees, collaborators and consultants, depending on the activity they carry out, with all the equipment necessary to protect them from any risk or danger posed to their physical wellbeing.

To this end, IIT is required to inform all employees and collaborators of the conditions imposed by law and practices and procedures relating to its health and safety policy. IIT is committed to maintaining its offices and operating systems in such a manner that it complies with all safety standards.

Employees and collaborators undertake, within the scope of the regulations regarding the carrying out of their duties, to comply with the conditions imposed by law and with every practice and

procedure adopted by the Foundation.

Finally, IIT shall make periodic checks to ensure that all safety measures are effectively implemented and enforced and shall act promptly, should corrective action become necessary. Employees and collaborators are required to report to the relevant officer on any safety-disregarding actions or conditions. Any form of retaliation against employees and collaborators who raise matters of health and safety in good faith is strictly prohibited.

Illegal Immigration

The Foundation undertakes, in accordance with the provisions of the Italian Immigration Law, to avoid business relations with persons without residence permit and activities in whatever way likely to favour the illegal access of immigrants to Italy.

Environment and protection of animal species

The Foundation pays special attention to environmental issues and undertakes to adopt strategies and techniques that improve the environmental impact of its activities in compliance with the applicable law taking into account the development of scientific research and experience.

The Foundation is committed to operating in accordance with the following principles in order to reduce environmental risks: i) the progressive integration of environmental aspects in its business activities, ii) implementation of all actions necessary to ensure compliance with and adjustment to the regulatory provisions in force; iii) constant update of staff on legislative and environmental legislation, iv) increasing staff members' awareness of and involvement in environmental issues.

The Institute manages activities related to the testing of animal species in full accordance with applicable laws. The Foundation also promotes and encourages the preservation of animal species and strongly condemns killing, destroying, capturing or withholding of specimens of endangered animal species or specimens representing a risk for health and/or public safety.

Compliance and ethics relating to money

It is forbidden to forge, circulate (buying and/or selling) banknotes, coins, public credit notes, stamps and watermarked paper. It is forbidden to replace or transfer money, goods or other property resulting from criminal conducts or perform actions by means of money, goods and other property which may prevent the identification of their criminal origin.

It is forbidden to use such property or money in economic or financial activities.

Computer Security

It is forbidden to penetrate or remain unlawfully within a computer system or a computer protected by security measures.

It is forbidden to illegally obtain, to oneself or a third party's benefit, codes, keywords or other means enabling access to a computer system or a computer protected by security measures.

It is forbidden to illegally obtain, to oneself or a third party's benefit, equipment, devices or

programs in order to damage or disrupt a computer or other telecommunications systems.
It is forbidden to damage or disrupt someone else's computer or remote working system.
It is not possible to intercept, prevent or interrupt computer or electronic communications unlawfully or to install *ad hoc* equipment to this purpose.
It is forbidden to destroy damage, delete, alter or suppress information, data or other IT programs.
Subjects who supply services relating to electronic signature certification are not allowed to issue said certificates by violating legal provisions.

Protection of copyright

The unauthorized public disclosure of original works protected by copyright or part of them through computer networks or connections of any kind is forbidden.
The content of a database cannot be reproduced on non-SIAE (Società Italiana degli Autori e degli Editori) sealed media, nor can it be transferred on to another medium, distributed, communicated, presented or shown to the public if this is done for lucrative reasons in violation of the author's exclusive right of execution and authorization. The extraction, re-use, distribution, sale or leasing of a database in violation of its owner's rights is forbidden too.
Unauthorized duplication, reproduction, transmission or public dissemination of an original work intended for television, cinema, sale or rental, discs, tapes, similar media or any other media containing phonograms or video recordings of musical, cinematographic or audio-visual works or sequences of moving images is forbidden.
The unauthorized reproduction, transmission or public dissemination of literary, dramatic, scientific, educational, musical or musical-dramatic works, including multimedia or parts thereof, even if included in collective or composite works or databases, is also prohibited.

It is forbidden to sell, distribute, launch on the market, dispose of in any way, project, transmit or make heard in public the works referred to in the preceding paragraphs. The activities described in the preceding paragraph are prohibited when their purpose is the creation of audios or videos not showing or showing a counterfeited SIAE seal, in those cases where the copyright mark is prescribed by law.

It is forbidden, in the absence of an agreement with the distributor, to transmit or distribute through any means an encrypted service received using equipment or parts of equipment for decoding restricted access transmissions.
In the case of production or import of materials not subject to SIAE seal in accordance with *art. 181 bis* of the Italian law on copyright, there is an obligation to inform SIAE of all necessary information for their clear identification within the terms indicated by the law.

Possession of pornographic material

Keeping inside the Foundation's premises, warehouses, office appliances or any other place attributable to the Foundation pornographic material or virtual images of subjects under eighteen years of age is prohibited.
Virtual images are understood to be images taken by a graphic technique not associated in whole or in part to real situations, where fictitious situations purport to look real.

Internal Audits

In order to ensure compliance with the law and all internal procedures, the Foundation provides an internal organization to ensure that: i) there is an adequate level of segregation of responsibilities, for which the execution of each process requires the joint support of different business functions, ii) all actions and operations which are carried out are suitably traced and it is possible to verify the decision-making, authorization and execution process, iii) each operation has adequate supporting documentation to allow at any time the performance of audits to certify the characteristics and motivations of the operations and identify the persons who authorized, performed, recorded and verified the transaction iv) all the internal documentation is kept in an accurate, complete and updated manner in compliance with existing procedures.

SECTION II - GUIDELINES ON SCIENTIFIC CONDUCT

IIT (hereinafter "the Foundation" or "the Institute"), in order to promote the integrity and the intellectual and scientific honesty of its staff (employees, contractors, PhD students, affiliates etc...), has developed these guidelines that, together with the national, European and international regulatory reference framework, constitute the general principles of conduct to be followed when carrying out any scientific research in which the Institute and its staff are involved.

DEFINITIONS

Misconduct in scientific research: indicates creation, forgery or plagiarism when proposing, implementing and evaluating IIT-funded research activities.

(a) Creation: refers to the artificial creation of data or results of research activities.

(b) Forgery: refers to the manipulation of materials, tools or research processes, modification, tampering or omission of data and results with the aim of deliberate misrepresentation.

(c) Plagiarism: refers to the appropriation of ideas, processes, results or words of another person without giving him/her due credit. The causes that give rise to plagiarism include failure to understand the definition of plagiarism itself, propensity to manipulate a text, tight schedules, work overload, poor supervision of trainees and the underestimation of its severity. The sanctions inflicted to the individual accused of plagiarism include: official reprimand, revocation of scientific articles or funding, dismissal from Foundation. Individuals holding whether direct or structural supervisory responsibilities failing to exert them properly may be placed under an observation period or be deprived of said supervisory responsibilities. This may in turn lead to a revision of said responsibilities within the working group.

The non-reporting of conflicts of interest in scientific communications where explicitly requested (for example by scientific magazines, organisations financing research, scientific companies that organise congresses etc.) represents a case of misconduct in research.

Misconduct in research does not include mistakes made in good faith or mere differences of opinion.

General principles

Personnel involved in scientific research must guarantee:

- a) compliance with the general principles of good faith and correctness;
- b) compliance with the policies and regulations of the Institute in the management of intellectual property, technology transfer, spin-offs, industrial property, tenure track procedures;
- c) compliance with specific customary rules underlying each area of research as regards the possession, selection and processing of data;
- d) prohibition to engage in activities of misconduct in scientific research in accordance with the above mentioned definitions.

Authorship's moral rights

Authorship is the explicit assignation of ownership and credit to original works.

Conducting a scientific experiment or any other research project involves many elements (formulation of a hypothesis, development or application of methodologies, data collection, analysis of results, public description of the work). As all these elements require not only technical skills but also intellectual contribution, they should be recognized in an appropriate manner through authorship. However, authorship does not imply ownership of exploitation rights nor of the use of an idea, methodology, research material or data.

Collegiality in Research

In the case of discrepancies with regard to the maintenance and deletion of research materials and data as well as related publications and/or inventions the commitment of the professionals involved will inevitably be damaged. This negative situation may undermine the goodwill, productivity and reputation of the involved subjects, stretching as far as the community of colleagues as a whole.

The principle of collegiality must shape all research activities carried out by IIT in order to ensure that:

1. during the early stages of work research groups are committed to discussing and regulating methods of data processing, merit, publication, deletion of data and research materials as well as future research directions; the unit's objectives must be clear and shared among all members;
2. the best possible method is found to settle disputes internally between the parties in question, the laboratory or the head of unit.
3. the decisions referred to in paragraph 1 may be revised periodically and regularly, since areas of scientific research as well as the individual allocation of activities are subject to change.

Storage of data and Databases

Key data must always remain within the laboratory and must be stored for a minimum of 5 years from the first major publication or the completion of an unpublished study as it can be considered reasonably necessary to make reference to them. If a researcher or another research participant leaves the laboratory he/she works for, key data shall remain property of the Foundation and be stored within the Foundation.

Copies of laboratory notebooks, electronic media, source codes and other research documentation can be made available or deleted upon authorization by the function in charge of the research. However, original data must be preserved. Storage data systems compliant with the regulatory provisions in force must be provided.

"Resignation" of a Researcher

"Resignation" from the research project by one or more research participants will compromise the integrity of the research.

It is the responsibility of the institution to establish appropriate cooperation agreements allowing the departing chief researcher to provide a continuous intellectual input to the

projects in which he/she was involved. Generally, continuous participation should be encouraged even after "Resignation" is given as defined below.

Responsibilities of Researchers after "Resignation" from the group

When researchers leave a group, tension can be created between them and the researchers who remain as well as between these researchers and the funders of the research project. However, a fair and open discussion on matters relating to future research efforts can significantly mitigate conflicts and give rise to opportunities for collaborative rather than competitive relations. Continuous intellectual input to the existing projects by the researcher who left the laboratory should be encouraged.

Supervision in Research

The supervisor in charge of research activities must make every reasonable effort to ensure that trainees and PhD students, are carefully supervised by their tutors (junior or senior researchers) as well as the whole scientific team. The complexity of scientific methods and the need to use caution when interpreting data that can be ambiguous require that the tutors play an active role in guiding new researchers. This is particularly appropriate in the case of a trainee who joins a research unit with limited experience in the activities carried out in a scientific laboratory. The main recommendations are shown here below:

1. The responsibility to supervise junior researchers must be specifically assigned to members present within each research unit.
2. The number of trainees per tutor must be kept low enough to allow close interaction for scientific exchange and control of research in all its phases.
3. The tutor must oversee the design of experiments and processes for data capture, registration, verification, interpretation and storage.
4. Collegial discussions between tutors and trainees within a research unit must be done regularly, in order to contribute to the scientific results of the members of the group and to provide a standard peer review of research activities.
5. The tutor must provide each researcher (be it a student, a postdoctoral researcher with a scholarship or a junior researcher) with the necessary means to conduct studies correctly when involving volunteers, patients, hospitals, animals, radioactive or other hazardous substances.

SECTION III - PRINCIPLES OF CONFLICT OF INTEREST

Recipients must retain a position of independence in the performance of their work to avoid making decisions or carrying out actions implying a presumed conflict of interest³.

Recipients, within the scope of the rules regarding the carrying out of their responsibilities, agree not to engage in any activity that may prevent the proper performance of their and are committed to avoiding situations or behaviours that may harm the interests or image of IIT.

Duty of non-competition

Recipients undertake not to accept or conduct, for themselves or on behalf of third parties, be they physical persons or legal entities, any assignment for the carrying out of activities which are in competition with the activity of the Foundation.

Duty of abstention

Each Recipient must refrain from taking part in the adoption of decisions of any type (i.e. assessments of researchers, the assigning of research funds, authorization to conduct missions, the assigning of machine time, etc.) and the performance of activities that may involve, directly or indirectly, interests of an economic and non-economic nature:

- a) themselves, spouse, cohabiting persons, relatives up to the fourth degree of kindred and any other family person up to the second degree of kindred (e.g. mother-in-law),
- b) individuals or organizations with which he/she or his/her spouse or partner has pending suits or credit/debt position;
- c) physical or legal persons of which he/she is the guardian, trustee, attorney or agent;
- d) legal persons of which he/she is the legal or de-facto administrator or manager.
- e) Students for which he/she is the mentor.

³ The term "conflict of interest" refers to any incompatibility or personal liability between an individual and the object of his/her professional activity rising from the subsistence of financial interests in the field of supply of goods and services or in the procurement of works, or, more generally, in the context of activities carried out by IIT which might affect the impartiality of the function or assignment.

Furthermore, with reference only to the search for and the selection of researchers, persons responsible for the lines of research are obliged to abstain whenever there are internal candidates afferent to their line of research.

Recipients must also refrain in the case of real reasons of opportunity or convenience. In particular, Recipients are obliged to abstain from any external activity which may affect the activity of IIT if:

- They carry out activity for organisations or committees responsible for the financing, supervision or evaluation of the activities of IIT.
- They carry out activity for government committees or bodies and/or research centres which could be possible competitors of IIT in the participation for calls for national or international funding, or in any cases in which there is the presence of strategic alliances for the carrying out of research projects of common interest.
- They carry out activity for companies, bodies, and other institutions with which IIT could form relations of a commercial or financial nature, or of technological assistance and/or transfer of any kind.

The intention to abstain must be made in writing by the person who is in a position of conflict of interests and must be properly motivated.

Duty of transparency

Employees are required to declare any conflict of interests that may link them to the scientific matter in the context of publications, research proposals or seminars.

If deemed necessary, the IIT Foundation reports to whom it may concern any non-declaration of conflict of interests.

Collaborators and Consultants undertake to not accept and in any case to not carry out either for themselves or for third parties, be they physical persons or legal entities, any assignment for the carrying out of activity which is in competition with the activity of the Foundation. Collaborators and Consultants also undertake to guarantee the impartiality of their work and to prevent potential conflicts of interest, also where these originate from contractual relations – both personal and on behalf of partnerships or corporations – with third parties who have relations of a commercial nature, or rather economical/financial obligations, with the Foundation.

Employees are required to regularly inform IIT of all ongoing remunerated or unpaid activities, as well as those terminated within the last two years, stating:

- a) if they, their relatives up to the fourth degree of kindred or cohabiting persons still retain economic or financial dealings with the subject with whom they have established the aforementioned collaboration;
- b) if these relations concern or have concerned individuals who may have an interest in activities or decisions relating to the fulfilment of their duties and practices in the work

assigned to them.

The following activities are not relevant to the purposes of this paragraph:

- collaboration with newspapers, magazines, encyclopaedias and the like;
- economic exploitation by the author or inventor of intellectual works or industrial inventions other than those carried out in the interest of IIT;
- participation in conferences, seminars or occasional teaching activities;
- assignments for which only the reimbursement of expenses is paid;
- assignments for the performance of which the employee is given unpaid leave or secondment.

Staff members shall indicate, in particular, the economic and financial interests that may place them in a conflict of interest position with a given function. They shall also declare to the Ethics Committee if their relatives up to the fourth degree of kindred or cohabiting persons are engaged in political, professional or economic activities entailing frequent contacts with Ministries having a supervisory role or their involvement in the decisions or activities of the Foundation.

Related Activities

Recipients must not accept from entities other than IIT, fees or other benefits for the performance of actions or services falling within the duties or functions they have been tasked with.

Employees, save when provided for by regulations in force, shall not accept collaboration contracts with physical or legal persons who are having or have had over the previous two years' economic interests in decisions or activities falling within their competence.

Collaborators are obliged to inform IIT if they have, or if they have had in the preceding two years, any role of collaboration with third parties who have, or who have had, interests in activities or regarding decisions relative to the role they have been entrusted with.

Recipients are furthermore invited to use the email address conflict_of_interest@iit.it to provide due communication regarding the emergence and/or default of causes and/or situations of conflict of interest, as well as to receive clarifications on this subject.

Memberships in associations and organizations

In compliance with current legislation all Recipients are required to report to IIT if they are members of any associations or organizations whose interests are affected by the duties they are tasked with by IIT.

The provisions of the preceding paragraphs do not apply if the Recipients are or become members of political parties or trade unions.

Reports and information

The recipients may use the email address conflict_of_interest@iit.it to forward their own reports in accordance with the afore-mentioned obligations of non-competition, abstention and transparency.

Ethics Committee

For evaluations relating to conflict of interest issues concerning the Recipients a special Ethics Committee is appointed. The Ethics Committee consists of three independent external members with complementary and different backgrounds extern appointed by IIT Board upon the Chairman's proposal

The Ethics Committee periodically reports to the Board on the activities undertaken.

SECTION IV - REPORTING VIOLATIONS TO THE CODE IN CASES OF SCIENTIFIC OR BEHAVIOURAL MISCONDUCT

General principles

The Foundation allows the recipients and every other person who participates in the research and administrative activities of IIT, both individually and in group, such as, but not limited to, doctoral students and guests who in any way and for whatever reason are in contact and/or collaborate with IIT, the opportunity to report any violations of the principles and rules contained within the Code, whether they relate to cases of behavioural or scientific misconduct, committed by the Recipients of the same Code. The report must be sent to the Supervisory Board at organismodivigilanza@iit.it.

It may also be sent anonymously and reports submitted in any other way, other than by email, will in any case be considered.

The SB, upon receipt of the report, is required to notify the sender of receipt of the same.

Jurisdiction regarding the report

The SB, having received the reports, performs a preliminary investigation into the allegations and assesses whether the report is within its jurisdiction. Where this is not the case, it forwards the report to the Ombudsperson.

The reports of violations of the principles contained in Section I (Rules of Conduct) and the circumstances under which the fact being reported as a violation is assumed to be relevant to the IIT Organizational, management and control model pursuant to Legislative Decree 231/2001, are within the jurisdiction of the SB.

The Ombudsperson examines the reports of violations of the principles and rules of the Code (Guidelines on Scientific Conduct) in Section II, in all cases in which the fact being reported can be qualified as scientific misconduct. The Ombudsperson is appointed, within the context of the scientific organization of IIT, from among the most prominent academic and scientific figures and with significant experience in the operation of a research organization.

Evaluation of Reports

The SB and the Ombudsperson, having received the reports, perform, each with their own procedure, an initial enquiry into the facts reported.

The SB, in compliance with the provisions of the Organizational Model, will report to the Executive Committee on the outcome of the activity performed to ascertain possible

violations relevant to Legislative Decree 231/01; similarly, the Ombudsperson will report periodically to the Executive Committee on the activities performed.

When analysing the report, the Ombudsperson will, in his/her advisory capacity, liaise with an Attorney legal consultant external to IIT (hereinafter the "Lawyer"). The Lawyer will analyse the report primarily evaluating the legal aspects.

If the report is deemed inadmissible, the Ombudsperson will communicate this (where possible) to the complainant and will explain to them in detail the reasons behind the decision and the opportunity to apply directly to the Executive Committee that, through the Chairman, will receive the report and the dossier prepared and, possibly in consultation with the parties involved, will make a decision on the matter.

With reference to the reports received within their jurisdiction, the SB and the Ombudsperson inform the Ethics Committee of each instance that is relevant to matters of a conflict of interests.

Confidentiality

The SB, the Ombudsperson and the Ethics Committee ensure that they deal with reported issues with due discretion, and safeguard privacy, so that neither the identity of the complainant nor that of the recipient of the report are disclosed to third parties without prejudice to those cases where there is due motivation.

All the necessary measures will be implemented to ensure that the complainant is not subject to pressure and/or influence of any kind, caused by the mere fact of submitting his/her report. However, measures will be taken against anyone lodging reports which are seen as defamatory or unfounded.

For every report received, a timely confirmation of the management of the same will be provided.

Sanctions

Once the investigation is concluded, the SB or the Ombudsperson, shall present their findings to the Executive Committee.

In cases of violation of the Code, the Executive Committee will make sure the relevant sanctions are applied.

Sanctions are defined by the employment legislation in force and they may range from suspension to termination of the employment contract.

Cases in which misconduct is enacted by subjects who wilfully take advantage of their higher hierarchical position or exploit it to the detriment of other subjects in a subordinate physical and/or psychological position are considered aggravating circumstances.