

LUISS



Code of Ethics

Revision and Update

March 2020

LUISS



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A. Introduction

A.1. Definitions

- “Candidates”: all of the potential candidates taking the admission tests for Luiss courses, including research doctorate programs, graduate school programs, master’s degree programs and advanced courses and potential candidates sitting exams to qualify as a certified public accountant and accounting expert.
- “Business Customers”: the persons who wish to purchase and/or have already purchased advisory, advanced training (executive and postgraduate) and research services.
- “Code of Ethics”: this Code of Ethics adopted by Libera Università Internazionale degli Studi Sociali Guido Carli.
- “Legislative Decree No. 231/2001” or “LD 231/2001”: the legislative decree setting out the rules governing the administrative liability of legal persons, companies and associations including unincorporated bodies.
- “Addressees of the Code” or “Addressees”: Governance Bodies, Employees, Faculty, Students, Alumni, Candidates, Business Customers and Partners and, in any case, any other person that the University maintains that this Code of Ethics is applicable to and should be communicated to.
- “Universal Declaration of Human Rights”: declaration adopted by the UN General Assembly on 10 December 1948.
- “Employees”: all employees of Libera Università Internazionale degli Studi Sociali Guido Carli (excluding Tenured Faculty).
- “Faculty”: i) “Tenured Faculty”, meaning the faculty hired by Luiss from among those who passed a public competition held by Luiss or another university or who enjoy tenure pursuant to article 1, paragraph 12, of Law No. 230/2005; ii) “Contract Faculty”, meaning Italian or foreign scholars and experts, including those holding non-academic positions, with whom Luiss has signed contracts for teaching and/or research activities, visiting professors and, in any event, all faculty other than Tenured Faculty; iii) “Researchers”, meaning those that hold a private-sector permanent contract of employment as a researcher further to a comparative evaluation

pursuant to article 1, paragraph 14, of Law No. 230/2005 and article 24 of Law No. 240/2010; and iv) “Research Grantees”, meaning those who have been awarded a research grant further to a comparative evaluation pursuant to article 51, paragraph 6, of Law No. 449/2007 and article 22 of Law No. 240/2010.

- “Confidential Information”: any information, data, knowledge, discovery, patented or patentable, know-how and, in general, any information of a technical, industrial, economic, commercial, administrative or other nature and likewise any drawing, document, magnetic support or sample of material, not public or publicly available, relating to the University and/or third parties, that is made available to Addressees on paper, electronically or in any other form, including but not limited to:
 - information, documents, data or prospectuses of any type relating to the University’s current or future balance sheet situation or organizational structure;
 - information, data, prospectuses, estimates or studies of any nature relating to or in connection with the property used and/or owned by the University, the operating and management processes currently used or that will or could be adopted by the University (including possible estimates and provisional valuations of an operating-management type nature), the products and/or services offered or to be offered to customers and/or current or future commercial policies;
 - all information deriving from and/or in connection with the analysis, summary and/or studies, if any, that are prepared or drawn up by the University and/or Addressees following an examination of Confidential Information (including documents, activities and information, formal and informal, transmitted verbally or in writing after meetings, talks or conversations in person or by telephone).
- “Alumni”: those who have been awarded an academic qualification by Luiss including PhDs, graduate school diplomas, university master’s degrees and advanced course diplomas.
- “Luiss” or the “University”: Libera Università Internazionale degli Studi Sociali Guido Carli.
- “Guidelines”: the Guidelines for the construction of organizational, management and controls models pursuant to LD 231/2001 approved by the Confederation of Italian Industry (Confindustria) on 31 March 2008 as subsequently amended and updated.
- “Organizational Model”: the organizational, management and controls model pursuant to LD 231/2001 of which inter alia also the principles of ethics and standards of conduct contained in the Code of Ethics as well as the procedures and other rules of the University form an integral part.
- “Supervisory Body” or “SB”: the body established to oversee the functioning of and compliance with the Model and revisions thereof pursuant to LD 231/2001.



- “Governance Bodies”: the Board of Directors, the President of the Board of Directors, the Executive Vice President, the Executive Committee, the Academic Senate, the General Manager and the Rector.
- “P.A.” or “Public Administration”: all emanations of the State (including institutions and schools of all types and levels, educational institutions and independent businesses and agencies of the State), regions, provinces, municipalities, mountain communities and their consortia and associations, universities, independent social housing institutions, chambers of commerce, industry, crafts and agriculture and their associations, ministries, non-economic national, regional and local public bodies, national health service agencies, businesses and bodies, the National Agency for Collective Bargaining (ARAN) and the agencies referred to in Legislative Decree No. 300 of 30 July 1999 as well as all those who exercise public powers and/or public functions including but not limited to:
- persons who exercise functions or perform activities equivalent to those of public officials or individuals charged with a public service;
 - members of the European Commission, the European Parliament, the European Court of Justice and the European Court of Auditors;
 - officials and other servants hired by contract pursuant to the Staff Regulations of Officials and the Conditions of Employment of Other Servants of the European Union;
 - persons seconded by the Member States or any public or private body to the European Union who exercise functions equivalent to those of officials and other servants of the European Union;
 - members and staff of bodies established on the basis of the Treaties of the European Union;
 - those who in the context of other Member States of the European Union exercise functions or perform activities equivalent to those of public officials or individuals charged with a public service;
 - officials of foreign States;
 - those who in the context of other foreign States or public international organizations exercise functions or perform activities equivalent to those of public officials or individuals charged with a public service.
- “Partners”: all workers other than Employees and Tenured Faculty who work for Luiss such as, for example, quasi-employees, independent contractors, collaborators, consultants and all other self-employed workers as well as persons – legal and natural – who contract with Luiss and, in any case, all persons (including suppliers and sponsors) with whom the University has and/or will have any form of relationship, de facto cooperation or specific contractual arrangement.

- “Offences”: the underlying offences to which the provisions of LD 231/2001 apply.
- “Disciplinary System”: the disciplinary system adopted by the University in order to punish breach of the procedures and other rules that constitute an integral part of the Organizational Model and the ethical principles and standards of conduct set out in this Code of Ethics.
- “Stakeholders”: all those who directly or indirectly entertain relations with the University as Employees, Faculty, Students, Alumni, Candidates and their relatives, Business Customers and Partners as well as the academic community, journalists, the media, the Public Administration and the authorities that the University deals with in the course of its business. More in general, stakeholders are any persons who in any guise have an interest in the very existence and operation of the University and whose interests influence or are influenced by the effects of what the University does.
- “Students”: all students enrolled at Luiss, whether undertaking their course of study within or outside the prescribed timeframe therefor, including those doing PhDs, attending graduate school, studying for a university master’s degree or taking advanced courses.

A.2. Foreword

Luiss is an independent university that pursues teaching and research in order to further knowledge, to train the managerial class and to prepare individuals for life and work. In this way Luiss intends to make a concrete and positive contribution to the development of a fairer, sustainable and inclusive society that respects the needs of future generations

The University’s primary purpose is the creation and imparting of knowledge, the promotion and organization of research, cultural and professional education and the transfer of innovation in accordance with the highest international academic standards, in contact with public institutions and the most advanced businesses.

Luiss Guido Carli, with its headquarters in Rome, is a private university with legal personality and didactic, academic, administrative, organizational and disciplinary autonomy, pursuant to article 33 of the Italian Constitution and in accordance with article 1 of the Higher Education Consolidation Act, approved by Royal Decree No. 1592 of 31 August 1933, as amended, and article 1 of Law No. 243/1991.

Supervision of the University is exercised by the Ministry for Universities and Research.

The University is conscious of the importance of the social contribution of the educational activities that it undertakes. Therefore, it seeks to pursue the search for competitiveness on the market through a proper and functional use of its own resources fully in keeping with the quality of the ethical-political system and the surrounding environment.

In addition to the quality of the services offered and market competitiveness, the University aims to increase its capacity to generate value and create wellbeing for the community as a whole. **From this** point of view, Luiss, consistent with the constraints imposed by economic sustainability, promotes social justice by encouraging the enrolment of students from less affluent backgrounds.

In view of the foregoing and ever apart from **what** the law actually requires, **by means** of this document the University wishes to set out the body of ethical principles and values that must inform its activities and the standards of behavior and conduct of those who internally and externally operate within its **sphere** of action.

Accordingly, this Code of Ethics sets out the rights, duties and responsibilities of a moral nature of the University towards the Stakeholders as well as the principles observance of which is required of all those who cooperate with the University in the pursuit of the goals that the institution has set for itself.

This Code of Ethics also establishes an Ethics Committee to oversee compliance with the principles contained herein.

A.3. Addressees

Save as may otherwise be expressly provided for in the articles hereunder, the ethical principles and the rules of conduct contained in this Code of Ethics must be observed and adhered to by Governance Bodies, Employees, Faculty, Students, Alumni, Candidates, Business Customers and Partners as well as any other person to whom the University considers that it should communicate the contents of this Code of Ethics (hereinafter also referred to collectively as the “Addressees”).

A.4. Purposes of the Code of Ethics

By means of this Code of Ethics, the University:

- sets out and discloses the values and ethical principles that inform its activities in relations with Stakeholders;
- specifies the ethical principles that Addressees must comply with.

In particular, this Code of Ethics:

- identifies the principles and rules of conduct that the University recognizes as being a positive and ethical value in ensuring that its own activities and those of Addressees are informed by **the notions of efficiency, transparency, competence, integrity, propriety, social and environmental sustainability** as well as respect for gender and cultural diversity;

- recommends, promotes or discourages certain conduct and/or behavior on moral grounds or for reasons of expediency, over and above and irrespective what may actually be required by law in force from time to time.

A.5. Code of Ethics and Organizational Model under LD 231/2001

This Code of Ethics is drawn up also in conformity with the provisions of Legislative Decree No. 231 of 8 June 2001 on the “rules governing the administrative liability of legal persons, companies and associations including unincorporated bodies” and the Confindustria Guidelines for the construction of organizational, management and controls models.

A.6. Publicization of the Code of Ethics

This Code of Ethics is publicized through:

- (i) posting an up-to-date version online internally (Intranet) and externally (Internet);
- (ii) posting a copy in the workplace in the prescribed manner;
- (iii) providing a copy to Addressees.

A.7. Revisions/Updates

The University may amend and/or update this Code of Ethics at any time in light of changes in circumstances and in the context in which it operates.

B. General Part

B.1. Luiss Ethical Principles

Luiss is a community that contributes to forming people through self-awareness, social responsibility and the study of the academic disciplines included in the curricula, in an environment open to internationalization and in contact with public institutions, the business world and the professions.

Conscious of the indispensable social and educational function of universities, Luiss requires all members of its own community, in the performance of their respective duties and having regard to their respective roles and degree of responsibility, to inform their own conduct by the following ethical principles – to protect single persons and safeguard the general interest – so as to foster the excellence of the University and constantly enhance its reputation and honor in Italy and the world.

B.1.1. Principle of personal dignity

Luiss acts in a manner that respects personal dignity and fundamental human rights.

B.1.2. Principle of integrity

Luiss pursues its objectives in keeping with the principle of integrity – understood in the sense of propriety, honesty and loyalty – in its internal and external relations so as to protect individual and collective wellbeing.

B.1.3. Principle of transparency and professionalism

Luiss undertakes its activities in line with the principle of transparency and professionalism, the latter understood as a commitment to fulfilling its tasks and responsibilities with a degree of care suited to their nature.

B.1.4. Equality and non-discrimination

Luiss recognizes the equal dignity of all of the persons involved in its own activities and does not discriminate on the basis of religious beliefs, political opinions, social conditions, gender, **sexual** orientation, ethnic origin and disability. Conscious of its educational and social function, the University promotes integration and dialogue between various traditions and cultures and fosters integration among people of different abilities on the basis of a recognition of equal consideration and respect for all individuals.

On the basis of the above premise, Luiss undertakes to consider (where possible) gender balance as a relevant criterion in the composition of the University's academic and administrative personnel.

B.1.5. Confidentiality

Luiss undertakes to guarantee the confidentiality of the information in its own possession so as to protect the physical and moral integrity of the individual, safeguarding their private life.

B.1.6. Valuing of human resources

Luiss values the capacity and aptitude of its own **human** resources with a view to their personal and professional growth, promoting the development of **abilities**, involvement in **decision-making**, a **teamwork** attitude and **co-responsibility** for the society of which **everyone** is an **integral** part.

B.1.7. Merit

Luiss recognizes and values individual merit as an essential criterion for **human and professional** development. It considers that fostering merit and individual talent – through both single tasks and **participation in teamwork** – **is a means** of achieving **growth, development and competitiveness** for the benefit of the entire community.

B.1.8. Sustainability

In light of its mainly educational purposes, the University has a special interest in **future** generations. Accordingly, it considers its primary task to respect and **promote** a general principle of environmental, social and economic sustainability.

B.1.9. Research and teaching

Luiss maintains that the openness of the results of research and teaching is a primary value and adopts the principles of open access to academic literature, promoting, where possible, the free dissemination online of the University's research output.

B.1.10. Correctness of communications with stakeholders

Luiss also pursues its objectives informed by the principles of completeness, veracity and timeliness of communication with Stakeholders and the principles of impartiality and confidentiality in relations with the latter.

GENERAL RULES OF CONDUCT OF THE ADDRESSEES

In abiding by the ethical principles of Luiss listed above, Addressees must:

- adopt all measures necessary to prevent breach of the University's ethical principles and ensure that those principles are observed;
- comply with applicable laws and regulations and all decisions adopted by the relevant authorities regarding the University (including any that impose sanctions or bans);
- refrain from illegal or inappropriate behavior;
- protect and value human resources, guaranteeing equal opportunities for human and professional development as well as working conditions that preserve individual dignity;
- responsibly use the University's resources so as to respect the environment and the rights of future generations and refrain from using those resources for purposes other than their proper ones;
- refrain from engaging in activities and/or behavior conflicting with the tasks and responsibilities assigned to them;
- refrain for pursuing personal or third party interests to the detriment of the University's general interests;
- refrain from using the University's name and exploiting it to further personal or third party interests.

SPECIFIC RULES OF CONDUCT OF THE ADDRESSEES

B.1.11. Rules of conduct in governance matters

Luiss maintains that the openness of the results of research and teaching is a primary value and Luiss) directed and/or in any event aimed at not observing the principle of transparency in management and the preparation of financial documents. Particular attention is to be paid to avoiding conflicts of interest, which means that Addressees are always obliged to communicate and disclose any interest that they, on their own account or for third parties, have in any given transaction of the University, specifying the nature, terms, origin and scope thereof.

B.1.12. Rules of conduct to protect human dignity and personal safety

It is forbidden to engage in any conduct (even if done in the interests and/or for the benefit of the University) directed and/or in any event aimed at exercising (or arranging for the exercise of) powers injurious to the dignity of and/or respect for human beings.

B.1.13. Rules of conduct to protect property (including IT)

It is forbidden to engage in any conduct (even if done in the interests and/or for the benefit of the University) directed and/or in any event aimed at:

- (i) unlawfully accessing a computerized or electronic system protected by security measures or remaining in it against the expressed or implied will of the person who has the right to exclude them;
- (ii) procuring, copying, disseminating, communicating or delivering codes, passwords or other means suited to accessing a computerized or electronic system protected by security measures or in any event providing indications or instructions in that regard;
- (iii) procuring, producing, copying, importing, disseminating, communicating, delivering or in any event making available to others of equipment, devices or software in order to illegally damage a computerized or electronic system or the information, data or programs contained therein or pertinent thereto or in order to facilitate the total or partial blocking or malfunctioning of the system;
- (iv) intercepting communications relating to a computerized or electronic system or exchanged between two systems, impeding or interrupting such communications or revealing all or part of the content of such communications to the public by any means;
- (v) installing equipment apt to intercepting communications relating to a computerized or electronic system or exchanged between two systems;
- (vi) destroying, damaging, deleting, altering or suppressing the information, data or software of others (including that that used by the State or other public body or pertinent to the latter or, in any event, of public utility);
- (vii) destroying, dissipating or damaging the real and personal property of others or making it impossible to totally or partially use such property;

- (viii) breaching the statutory obligations for the issuance of a qualified certificate (with reference to persons that provide electronic signature certification services).

B.1.14. Environmental sustainability

The University fosters environmental protection in all of its forms, discouraging any conduct (even if done in the interests and/or for the benefit of the University) directed and/or in any event aimed at:

- a) polluting the air, soil, subsoil, surface water or ground water or harming protected flora and fauna other than as permitted;
- b) collecting, transporting, recovering, disposing of, trading in and dealing in waste in the absence of the prescribed authorization, registration or communication or mixing waste in an unauthorized fashion.

Moreover, the University is committed to promoting and respecting the principles of environmental sustainability and protection by establishing an environment that is consistent with the principles of sustainability and that gives concrete effect to them (e.g. the drastic reduction in the consumption of single-use plastic, the creation of laboratories and places of self-production such as the Community Garden and the adoption of energy efficiency measures).

B.1.15. Protection of originality of research

Aspiring to be a leading international university, Luiss promotes the originality of research and hence totally disapproves of any conduct (even if done in the interests and/or for the benefit of the University) directed and/or in any event aimed at making protected works or parts thereof available to the public without being entitled to do so, for any purposes and in any way.

B.1.16. Gifts and presents

Members of the University are always required to act in the interests of Luiss. It is therefore forbidden to solicit offers of gifts or benefits. Members of the University are also required to refuse gifts or benefits of a significant size that may influence, even indirectly, the performance of university duties.

B.2. Relations with Stakeholders

B.2.1. Relations with Students and student associations

The University pursues its own institutional purposes through offering Students high level education services in a manner that complies with the principles of environmental, social and economic sustainability.

Consistent with the institutional purposes pursued, the University guarantees the right to study for all Students that have access thereto within the limits of applicable law. The selection of Students and the assessment of the results that they achieve during the course of their university studies are informed by the principles of objectivity, transparency, meritocracy and non-discrimination.

In its relations with Students the following are paramount objectives of Luiss:

- offering and providing high-level education/culture;
- satisfying Students' requests in so far as they are consistent with educational activities, constantly improving the level of the services offered;
- establishing relations with Students informed by trust, mutual cooperation, professionalism, honesty, propriety, transparency, willingness, respect, courtesy and listening.

In the context of relations with Students and subject to complying with internal procedures, Addressees must:

- (i) ensure that **their** conduct is informed by the principles of professionalism, honesty, propriety, transparency, willingness, respect and courtesy in both the negotiations phase **and when** undertaking contractual commitments;
- (ii) seek to ensure maximum satisfaction for Students, providing the latter with inter alia true, exhaustive and accurate information on the products and services supplied so as to facilitate informed choices;
- (iii) ensure that Students are treated uniformly and avoid unwarranted discrimination in connection with physical condition, political opinions, nationality, religion, gender and sexual orientation, with no favoritism, cronyism or nepotism permitted;
- (iv) provide high quality services in line with the reasonable expectations of Students within the limits of the relevant contractual terms.

Luiss facilitates participation by Students in the life of the University also through granting them representation on some Governance Bodies or committees at the University as well as through promoting and supporting the student associations with social and cultural aims that may be set up by Students. Luiss may cooperate with such associations, including financially by awarding them grants.

B.2.2. Relations with Faculty

Luiss affords utmost importance to the professionalism and competency of its Faculty.

Therefore, it recognizes and assures freedom of teaching and academic research and adopts all the steps and measures necessary to enable Faculty to do their work in an optimum manner.

The University promotes study and research by Faculty and looks favorably upon such work also being done for third parties provided that it does not hinder performance of the teaching and research duties or other obligations that the Faculty owe to the University.

B.2.3. Relations with Employees

The University avails of the services of Employees and/or other workers.

Luiss attributes utmost importance to its human resources, who constitute an indispensable factor for the very existence, development and success of the University itself. Accordingly, Luiss directly contributes to the development of the professionalism of its Employees, respecting their personalities and aspirations.

In labor relations the University values the abilities, potential and commitment of Employees and other workers, adopting objective assessment criteria in relation to their professional qualifications and individual capacity, offering equal opportunity for professional growth and economic advancement in line with the contribution made by each one.

Luiss is also studying new forms of corporate welfare that have as their object the periodic monitoring of employees' health and their active participation in the life of the University.

Luiss wishes to shape and invest in the training and development of its employees and workers in order to make the workplace a welcoming environment and respectful of the coexistence and diversity of each person, taking inspiration from the best international practice and fostering systems and working methods in line with new technologies and opportunities.

The University does not tolerate any form of discrimination in connection with physical condition, political opinions, nationality, religion, gender and sexual orientation. No favoritism, cronyism or nepotism is permitted.

B.2.4. Relations with Business Customers

The ethical principles and the rules of conduct envisaged for relations with Students extend – where applicable – also to relations with Business Customers.

Moreover, contracts entered into with Business Customers and any communications addressed to the latter are informed by criteria of simplicity, clarity and completeness, avoiding recourse to any misleading and/or unfair practices howsoever committed.

B.2.5. Relations with Candidates

Consistent with the institutional purposes that it pursues, the University assures the widest participation in admission tests for enrolment at the University.

Selection of Candidates for those admission tests and the assessment of their results is done in line with applicable law and the relevant internal procedures.

In the context of relations with Candidates and subject to complying with internal procedures, Addressees must:

- (i) ensure that **their** conduct is informed by the principles of professionalism, honesty, propriety, transparency, willingness, respect and courtesy;
- (ii) seek to ensure maximum satisfaction for Candidates, providing the latter with inter alia true, exhaustive and accurate information on the services supplied so as to facilitate informed choices;
- (iii) ensure that Candidates are treated uniformly and avoid unwarranted discrimination in connection with physical condition, political opinions, nationality, religion, gender and sexual orientation;
- (iv) provide high quality services in line with the reasonable expectations of Candidates within the limits of the relevant contractual terms.

B.2.6. Relations with Alumni

Consistent with the institutional purposes that it pursues, the University promotes job placement for Alumni through dedicated channels, subject to applicable law and the relevant internal procedures.

The above mentioned placement activities are done in keeping with the principles of objectivity, transparency, meritocracy and non-discrimination.

The University recognizes the value of alumni associations and seeks to work with them in order to consolidate the sense of community shared by all Luiss members.

B.2.7. Safety in the workplace and on Luiss premises

The University promotes a safe and healthy working environment on its premises and, within practical limits, elsewhere when personnel are on mission in Italy and abroad. To that end the University:

- > undertakes risk assessment;
- > combats risks at source;

- adopts appropriate occupational health and safety measures designed to avoid and/or reduce the associated risks;
- adapts the workplace, in particular, as regards the notion of workstation and choice of offices, equipment and methods of work and production, in order to ensure conditions that respect physical integrity, moral wellbeing and individual dignity, to attenuate monotonous and repetitive work and to reduce the effects of work on health;
- takes into account developments in the state-of-the-art and technological advances;
- plans measures to prevent occupational accidents taking into account the state-of-the-art, the organization of work, working conditions, social relations and the influence of working environment factors;
- informs Employees, other workers and Partners regarding all risks and in relation to the use of protective, health and safety equipment such that they are able to face up to the risk of injury in the workplace (that information is furnished where necessary also to Faculty, Business Customers, Students, Alumni and Candidates);
- gives priority to collective protective equipment compared to personal protective equipment;
- gives adequate instructions to Employees and other workers and, where necessary, also to Faculty, Students, Business Customers, Alumni and Candidates;
- devises specific objectives and plans for improvement, aimed at minimizing occupational illness and accidents and guaranteeing occupational health and safety.

B.2.8. Occupational health and safety policy

The occupational health and safety policy, which constitutes an integral part of the Occupational Health and Safety Management System (SGSL), is attached as Annex1 to this Code of Ethics.

B.2.9. Relations with Partners

The University entertains relations with its Partners informed by compliance with law and the principles of this Code of Ethics, in particular adhering to the highest professional standards and best practice in matters of ethics, health and safety and respect for the environment.

The selection of Partners and agreement on the terms and conditions for the purchase of goods and services for the University:

- must be informed by the values of competency, inexpensiveness, transparency, competition, objectivity, propriety, impartiality, fair prices and quality of the goods and/or

services and by criteria that assure economic, social and environmental sustainability throughout the supply chain;

- must take account of the overall terms of the offer in general and be based on a detailed assessment of the guarantees provided.

All Partners selected must have a good reputation, including from an ethical point of view.

Moreover, cooperation with Partners is to be pursued in order to constantly ensure satisfaction of the needs of the University and its customers in terms of quality and delivery times.

Negotiations and signing of contracts with Partners must always be based on extremely clear relations.

All fees and/or amounts paid in any guise to Partners must be adequately documented, be proportional to the activities carried out and be in line with market terms.

Addressees who deal with Partners must act in a professional and independent manner.

Addressees must also act without any conflict of interest that could influence their decisions in negotiations with Partners. Should any such conflict of interest exist, Addressees must declare it **and** immediately refrain from making decisions.

In particular, the University's bargaining power **must not be used** for personal ends. It is unethical and hence contrary to the principles set forth in this Code of Ethics to obtain any personal advantage from a Partner.

B.2.10. Relations with the promoter

Luiss is promoted by Associazione per la Libera Università Internazionale degli Studi Sociali Guido Carli (ALUISS), which, as the promoter, assures the pursuit of the University's institutional purposes and provides the necessary services and means.

One of the central aspects that make Luiss' conduct ethical is observance of the principles of **conduct** designed to ensure that the above **mentioned** institutional aims are pursued **in a manner** that:

- (i) strengthens the solidity of the University from the standpoint of medium-to-long term market sustainability;
- (ii) safeguards the investments made by the promoter ALUISS.

B.2.11. Management of Luiss activities

Luiss activities aimed at pursuing the University's purposes must be lawful, coherent, appropriate, knowable and traceable through correct and adequate records.

B.2.12. Recording and traceability of transactions

All transactions must be correctly recorded, authorized, verifiable, lawful, coherent and appropriate.

Every transaction must be accompanied by supporting documentation (which may not be destroyed or deleted) so as to enable checks to be carried out at any time to establish the features and reasons for the transaction and to identify who authorized, carried out, recorded and checked the transaction itself.

Records must be kept for a minimum of 10 years unless otherwise provided for by law.

B.2.13. Budget

The budget is the tool used to adequately monitor the degree to which expected cost and revenue targets are met, is prepared by the University's administration and is approved by the relevant Governance Bodies.

Changes are not permitted except where envisaged by the relevant organizational procedure, which also governs budget management, and in any event subject to adhering to the resolutions adopted by the relevant Governance Bodies.

Any changes that are approved operate to update the budget.

It is to be hoped that, over time, sustainability reports will also become part of traditional financial statements so as form a single document.

B.2.14. Keeping of accounts and preparation of the financial statements

The process for gathering, handling, processing, presenting and checking accounting data must be done chronologically, clearly and at scheduled intervals and be informed by the principles of truth, propriety, completeness and transparency.

For any transaction carried out by the University that must be recorded in the accounts, the supporting documentation is to be conserved for the prescribed statutory period so as to enable one to:

- immediately establish to establish the features and reasons for the transaction;
- accurately reconstruct the timeline of the transaction, easily reconstruct the process in accordance with which the transaction was decided, authorized, carried out, recorded and checked and identify the various levels of responsibility and verification.

The financial statements must be drawn up in accordance with accounting law and standards, preferably consistent with sustainability accounting principles, and with the utmost care and professionalism.

To that end Addressees of the Code of Ethics, in so far as it concerns them, must act with propriety and transparency so as to guarantee the veracity, accuracy, completeness and clarity of the accounting and management data and information contained in the accounting records, the statutory financial statements and all of the other documents depicting the assets, liabilities, financial position and profit and loss of the University.

B.2.15. Conflicts of interest and declarations in that regard

A conflict between the personal interest of an Addressee and that of the University arises whenever conduct or a decision by an individual is potentially able to generate an immediate or deferred advantage for that individual or their relatives at the expense of the University's interest.

The conflict of interest may have a direct effect on the individual that is such as to be able to influence or, in any event, impair the latter's objective judgment to the extent of possibly undermining loyalty towards the University.

It is forbidden to pursue personal interests to the detriment of those of the University or to use the University's resources for personal or unauthorized purposes and likewise any information obtained during the course of one's duties.

Whoever maintains that they may have a conflict of interest – even just potentially – with that of the University must declare it before the conflict in question arises in order to allow the University to determine what steps to take. The same applies to any apparent conflict of interest, where the interests of the individual do not conflict substantially with those of the Institution but the real situation is not easily perceptible to the outside eye and may thus cause reputational damage.

Should the conflict arise unbeknownst to the person concerned and/or without any action by them, the person must nonetheless bring it to the attention of the University as soon they become aware of it.

Before accepting any form of public and/or political office, Addressees must ensure that there can be no possibility of a conflict of interest with Luiss and that the proposed office cannot have an adverse effect on their relationship with the University.

Members of Governance Bodies, Employees and Faculty must refrain from engaging, on their own account or for third parties, in activities that compete with the commitments given to the University.

Without prejudice to applicable laws and regulations and the obligations thereunder, members of Governance Bodies and Employees must avoid any actual or potential conflict of interest with

the University and, in any event, declare to whoever it may concern, the activities, the financial interest and external relations that could give rise to conflicts of interest or the semblance thereof.

In particular, each member of the Board of Directors of the University must inform the other **members** of the Board of Directors of any interest that he or she, on his or her own account or for third parties, has in a given transaction of the University, specifying the nature, terms, origin and scope thereof. Executive directors must refrain from carrying out transactions entailing a conflict of interest, referring the matter back to the Board of Directors as a whole.

B.2.16. Processing of the University's Confidential Information

The University's Confidential Information is valuable property and its protection is essential for the University's growth and ability to compete.

Therefore, Addressees must not:

- reveal the Confidential Information to third parties and/or disseminate it except in cases where such has been authorized;
- utilize the Confidential Information for personal benefit.

Even after their relationship with the University ceases Addressees shall still be bound by their obligation not to disclose the Confidential Information until such time as it passes into the public domain.

B.2.17. Processing of third parties' confidential information

The University's ethical principles also require respect for the confidential information of third parties. Therefore, Addressees must protect and not disclose **that** confidential information, processing it within the limits of the authorization received in order to avoid an improper use thereof in any way or by any means.

B.2.18. Relations with the Public Administration

Relations with the Public Administration must be entertained by Addressees in total and strict compliance with the applicable law, the ethical principles and rules of conduct set out in this **Code of Ethics**, the procedures and other rules adopted by Luiss (including internal regulations) and, in any event, in a manner that will never compromise the reputation and integrity of the University itself.

B.2.19. Relations with political organizations and trade unions

The University does not give contributions in any form, direct or indirect, to political organizations and trade unions or their representatives or candidates save for what is payable by law.

However, the University may cooperate, including financially, with parties, movements, committees, associations or other organizations of a political or trade union nature exclusively in relation to specific projects that meet the following requirements:

- aims connected to the institutional purposes of Luiss;
- clear and documentable use of the resources;
- express authorization from the relevant Governance Bodies;
- notification of the Supervisory Body.

Any disbursed resources must be paid in a manner that strictly complies with applicable laws and regulations.

The relevant operations must be adequately documented.

Any contributions made by Employees and likewise any activities that they engage in are to be considered as being on a personal and voluntary basis.

B.2.20. Relations with Creditors

The University recognizes and protects the interests of its creditors, if any, guaranteeing compliance with applicable law and the ethical principles and rules of conduct set forth in this Code of Ethics.

B.3. Rules of Conduct for the Use of Luiss Property and Resources

B.3.1. Responsibility for Luiss property and resources

Addressees are responsible for all of the University's property and resources in their custody, with a duty to protect them against risk of loss and/or damage.

B.3.2. Use of Luiss property and resources



Luiss property and resources (including IT) must be used exclusively for the purposes for which they are intended and in accordance with the procedures and/or rules adopted by the University itself.

Addressees must take the necessary care to protect the University's property and resources, avoiding any improper use thereof that could cause damage and/or impair their functionality or, in any event, use thereof contrary to the University's interests.

Addressees must protect the University's property and resources so as to prevent the improper and/or fraudulent use thereof. Addressees may not use that property and resources for personal purposes or ones falling outside the scope of their appointment unless the University expressly authorizes – in writing – such additional use.

Luiss is committed to promoting initiatives, agreed with the Addressees, to enhance the value of its properties and afford access thereto for the benefit of all and the surrounding community (access to the parks, the University's Community Garden, visits to Villa Blanc and the possibility of participating in specific events of general interest).

B.3.3. Environmental Sustainability

Luiss respects the environment not only when providing services to Students and customers but also when carrying out all other activities and is committed to progressively implementing improvements aimed at minimizing its ecological footprint, equipping itself with advanced systems of management **and** monitoring of energy, waste, transport **and** **garbage**.

Addressees must recognize that environmental protection is a primary value as is the promotion of environmental sustainability.

In particular, Addressees must do what is possible to actively improve the efficiency with which the University's property and resources are used **and** **must** use environmentally friendly products and/or services.

Addressees must moreover adhere to management instructions on reducing environmental impact.

C. Special Part - Specific Rules of Conduct for Some Addressees

Without prejudice to the rules of conduct set out in the preceding Chapter B (General Part) applicable in general to all Addressees, the following rules of conduct apply solely to the stated category of Addressees.

C.1.1. Rules of conduct for Candidates

Candidates are obliged to observe applicable laws and regulations and act in keeping with the principles of honesty, propriety and earnestness in the various selection phases and, in general, in relations with the University.

By way of example only, Candidates must provide true information relating to their curriculum vitae in the context of applications to sit admission tests and abide by the instructions given by Faculty, Employees and other workers.

C.1.2. Rules of conduct for Students

Students are obliged to observe applicable laws and regulations and act in keeping with the principles of honesty, propriety, earnestness and cooperation in their dealings with fellow students, faculty and all Luiss personnel.

Students' behavior must be informed by the principles of personal dignity, non-discrimination on the basis of physical condition, political opinion, nationality, religion, gender, sexual orientation and disability. Students must dress in a sober and dignified manner on university premises in keeping with the fact that they are at an academic institution and refrain from consuming alcohol and/or drugs.

Plagiarism, and in any case any improper use of academic material in the writing of dissertations for assessment, is forbidden. Plagiarism has obvious consequences for the academic evaluation of the guilty student but it can also give rise to further moral and legal sanctions. A judgment in the matter is given on a case-by-case basis by the Ethics Committee, which informs the University's top bodies thereof.

Without prejudice to freedom of expression and the right of criticism, students must always express themselves (in writing, verbally and through digital channels) in a dignified and civilized manner, avoiding violent and discriminatory language that could damage the University's reputation.

The rules to be followed in the use of social media are contained in this Code (see Social Media Policy).

Students must not damage the facilities (including Luiss property, premises and resources) that they use and must abide by the instructions given by Governance Bodies, Faculty, Employees and other workers of Luiss or other university/institution where they are staying for a period of study.

In addition, students are required to adopt an attitude consistent with the principles of environmental protection and sustainability, avoiding the waste of resources, energy and food.

The provisions of this article also apply when Students spend a period of study at other Italian or foreign institutions/universities, consistent with the latter's own rules.

C.1.3. Rules of conduct for Faculty

The main duties of Faculty concern research, teaching, input into the recruitment of new academic staff and relations with colleagues as well as the University's personnel, Students and Business Customers.

As far as research is concerned, Luiss grants full freedom of research to all Faculty such that the latter must pursue the advancement of knowledge in their own fields and disciplines with a commitment to achieving the truth.

Faculty must avoid, as far as possible, directly and indirectly influencing *ex cathedra* students on particularly controversial topics, especially of a political, religious or sexual nature, or which may perturb the students themselves.

Faculty owe similar obligations of fairness and non-discrimination to their colleagues, especially if they are younger and if in some way their future career may be influenced by them. This does not preclude them from exercising a right of criticism and professional judgement.

Faculty are obliged to make sure that their behavior towards Luiss Governance Bodies, Employees, Students, Business Customers and, where required, Candidates and Alumni, is informed by the principles of cooperation, objectivity, transparency, meritocracy and non-discrimination.

In competitions and in the input made to the recruitment of new academic staff, Luiss grants full freedom of choice to the Faculty such that the latter must be committed to selecting the best candidates in their own fields and disciplines, avoiding any form of personal or academic favoritism, conflict of interest, discrimination and prejudice.

Without prejudice to freedom of expression and the right of criticism, students must always possible, to ensure the maximum dissemination of the results of research carried out in the university environment by exhibiting behavior in line with Open Access, in compliance with intellectual property rights and industrial confidentiality commitments.

C.1.4. Rules of conduct for Alumni

Alumni are obliged to observe applicable laws and regulations and act in keeping with the principles of honesty, propriety and earnestness in relations with the University, also in order to protect the latter's reputation and prestige in the sector that they work. To enable the University to efficiently undertake job placement activities, Alumni must respect Governance Bodies, Faculty and Employees and cooperate with them.

Luiss alumni associations, without prejudice to their institutional and organizational autonomy, maintain collaborative relationships with the University and must ensure that their conduct is informed by moral standards such that it will not jeopardize the good reputation of Luiss itself.

C.1.5. Rules of Conduct for Employees

In all relations with the Addressees of this Code of Ethics, Luiss Employees must abide by the principles of integrity, fairness, good faith, transparency, fairness, reasonableness and impartiality. Consistent with the principles of this Code of Ethics, employees **must** strive to work solely for the benefit of Luiss and its reputation. Particular care must be taken to avoid any conflict of interest.

C.1.6. Rules of conduct for Business Customers

Business Customers are obliged to observe applicable laws and regulations and act in keeping with the principles of honesty, propriety, earnestness and cooperation.

Moreover, Business Customers must not damage the facilities (including Luiss property, premises and resources) that they use and must abide by the instructions given by Faculty, Employees and other workers.

D. Establishment of the LUISS Ethics Committee

The Ethics Committee is an independent body that meets when convened by its own Chairperson and formulates opinions, guidelines and measures regarding violations of the Code of Ethics. The substance of the Ethics Committee's decisions is moral and not legal, economic, business or administrative in nature.

At the beginning of each meeting, each member of the Ethics Committee declares that he or she has no conflict of interest regarding any matters on the agenda.

Functions

- (i) Promotes the knowledge and dissemination of the Code of Ethics and the principles on which it is based.
- (ii) Assesses the application of the Code of Ethics regarding the activities of all Addressees, with particular reference to defending the good name of Luiss.
- (iii) Discusses ethically sensitive issues related to university life, funding issues and stakeholder relations. In matters of research, the Ethics Committee obtains the opinion of the Research Committee.
- (iv) Receives reports (in writing and not anonymously) of violations of the Code of Ethics. In cases where the matters reported relate to misconduct that is relevant for disciplinary purposes, the Ethics Committee may refer the matter to the appropriate bodies. When dealing with matters relating to alleged violations of the Code of Ethics, the Ethics Committee discusses the reports and all necessary documentation and, after hearing all parties involved, makes a decision by absolute majority vote.
- (v) Upon request, provides advice to University personnel on ethically sensitive issues.

Composition

The Ethics Committee, whose **members** hold office for renewable 3-year terms, is composed of:

- the Rector (or a representative designated by the latter);
- the General Manager (or a representative designated by the latter);
- an expert on ethics appointed by the Executive Committee;
- a Research Committee representative appointed by the Executive Committee;
- a person from outside Luiss appointed by the Executive Committee;
- a **non-voting** Secretary.

E. Social Media Policy

Luiss University

- recognizing and guaranteeing freedom of expression of thought under article 21 of the Constitution as a fundamental human right;
- understanding the importance of social media platforms as a tool for communication and expression of the thoughts of each individual and for the dissemination and sharing of information;

has established the policy set forth herein concerning the use of social media during conversations that may have an impact on the University's reputation.

The aim of the policy is to make the conversations involving the University fluid, transparent and respectful, to protect the University's image, reputation and credibility as well as that of all those who work at or interact with it and to promote the use of virtual communication tools having regard to the principles of legality, ethics and propriety.

The policy is addressed to the governing bodies, managers, employees, other staff, faculty, students, alumni, stakeholders, persons who work with the University or on its behalf and, in general, to any user who engages in conversations related to LUISS on social media platforms.

The University respects and cherishes freedom of expression and the sharing of information and knowledge but asks that such occur in a manner that respect the liberty and rights of others.

Therefore, it is recommended that everybody express their opinion correctly and in a measured tone, based as much as possible on verifiable facts and respecting the opinions of others.

The fundamental distinction in this matter is that between the use of Luiss institutional accounts and personal, private and in any case non-Luiss accounts. In the event of improper use of institutional accounts, one risks incurring serious sanctions of a business and legal nature. On the other hand, in the event of improper use through channels other than institutional ones, the case is formally more complex. The case in question will be submitted to the Ethics Committee, which will decide what to do on a case-by-case basis, resorting - if deemed necessary - to legal assistance in the event of existing contractual commitments or to the courts.

Use of Luiss Social Media Accounts

LUISS social media channels pursue the aim of contributing to the communication and dissemination of knowledge of information, events, services and opportunities.

Comments to the University's posts are considered as constituting important feedback for the institution and are therefore encouraged, provided that they pertain to topics of public interest and bearing in mind that they express exclusively the author's point of view.

In the use of social media networks, users are free to discuss the University and their experience here, provided that this is done with respect for the name and prestige of the institution and in a manner that does not harm the institution's image, credibility and reputation.

It is forbidden to publish information and content that may be considered contrary to the mission and values of LUISS as defined in the Code of Ethics, including legality, efficiency, transparency, competence, integrity and propriety.



Annex 1 – Occupational Health and Safety Policy

Luiss is committed to improving health and safety in the workplace, investing human resources, equipment and funds to that end.

The University publishes this document and undertakes that:

- (i) right from the very start of any new activities or the review of existing ones, safety aspects will be considered as essential;
- (ii) all workers will be trained, informed and **made aware** of what is at stake so as to be able to do **their** jobs in safety and **assume** responsibility as regards occupational health and safety;
- (iii) all workers, commensurate with their attributes and duties, will participate in achieving the set safety objectives by ensuring that:
 - all applicable laws, regulations and procedures are complied with and likewise the relevant University standards;
 - the plant, equipment, workplace, operating procedures and organizational aspects are devised in a way that safeguards the health of workers, third parties and the community in which the University operates;
 - the information on risks within the University is given to all workers;
 - the training of workers is done and updated with specific reference to their job descriptions;
 - **needs** that emerge during the course of work are addressed rapidly, effectively and carefully;
 - cooperation is fostered among the various Luiss resources and likewise with business organizations and the relevant external bodies;
 - all applicable laws, regulations and procedures are complied with and likewise University standards;
 - University activities are undertaken also with the objective of preventing occupational accidents, injuries and illness and of guaranteeing occupational health and safety, and workplaces, plant and equipment are designed, used and maintained (including cleaned) bearing the foregoing in mind.