



**Centro Cardiologico**  
Monzino

# **CODE OF ETHICS**

of  
**The Monzino CARDIOLOGY Centre**

**Text approved by the Board of Directors  
meeting dated 27 March 2007**

# CODE OF ETHICS

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***Annex: Regulations for the Prevention of Conflicts of interest and Intellectual Property Rights***

# 1. INTRODUCTION

The Monzino CARDIOLOGY Centre (CCM) pursues excellence in the field of cardiovascular diseases by integrating scientific and educational research with clinical activity, with continual attention to the quality of the service provided to patients.

This Code of Ethics, and the annexed Regulations regarding conflicts of interest, was adopted by the Board of Directors in implementation of Legislative decree no. 231/2001, with the following aims:

- to ensure conditions of propriety, transparency and efficiency in the conduct of hospital activities, as a key public service provided by CCM in its capacity as IRCCS [Research Hospital], contracted with the University of Milan;
- to develop awareness and compliance by all persons collaborating with the Institute for whatever purpose pursuant to a contractual relationship, including temporary (henceforth known as Collaborators), of the complex of values and rules of conduct the Institute has as a continual reference in its activities, to protect its reputation and image.

The reference values for CARDIOLOGY are: respect for the patient, respect for one's colleagues and respect for the rules of the hospital organisation.

CCM is aware that the creation and proliferation of company values is an integral part of respect for the fundamental principles/professional probity, personal integrity and confidentiality.

In consideration of the above, CCM regards this Code of Ethics as an instrument for regulating and disciplining its activities and the principles contained within it, the model of conduct in external and internal relations at any hierarchical level or responsibility.

Compliance with the Code is to be considered an integral part of the contractual obligations taken on by Collaborators. Its violation shall be deemed a serious breach of the obligations deriving from the employment contract and shall be deemed unlawful civilly, with all consequent personal liability.

The CCM Hospital Administration oversees the compliance with the rules set out in the Code of Ethics, providing for corrective actions to be put in place in the event of violation of the said Code.

## 2. GENERAL PRINCIPLES

### 2.1 General ethical principles

The CCM requires compliance with the general ethical principles described in the following in carrying out its operations.

#### 2.1.1 Compliance with the law and honesty

CCM is committed to conducting its activities according to European, national and international regulations, and rejects any conduct that is contrary to the law and in particular that which may constitute crimes of corruption.

Pursuing the interest of the Institute may in no event be considered a circumstance offering exemption from breaking the law, neither may it justify dishonest conduct.

The members of the corporate organs, the Hospital Administration, the Managers of the clinical, support and research Departments and in general the employees, collaborators and consultants of the Institute are required to comply with the regulations in force, this Code of Ethics, the hospital regulations and guidelines in performing their professional activities.

#### 2.1.2 Propriety in case of potential conflicts of interest

In conducting any activity each person involved must avoid any conflict between his/her personal, company, financial or political interests and the interests of the Institute. He/she must always act in the Institute's favour according to methods that enhance rather than damage its reputation.

The same requirement applies to members of the corporate governance bodies, the Institute administration, consultants and collaborators.

In the event of conflict of interest, or even a situation of mere apparent conflict of interest, the provisions of the *Regulations on the prevention of conflicts of interest and intellectual property rights* will apply, and it is a requirement to inform the relevant Manager and Director of Human Resources.

#### 2.1.3 Diligence and accuracy in operations and providing professional services

CCM considers it of fundamental importance to provide the patients and individuals/entities with whom it has a relationship deriving from the fulfilment of its activities, with high quality services.

To this end, the professional services of the employees and collaborators of the Institute must be followed with the maximum diligence, accuracy and professionalism.

In order to pursue continual improvement of the service offered, CCM shall listen to the requests and suggestions of its users.

#### 2.1.4 Impartiality and propriety

CCM considers impartiality of treatment an important value in any internal and external relationship with the Institute.

It therefore rejects, counters and penalises any discrimination regarding age, gender, sexuality, health, race, nationality, political opinions and

religious beliefs of all those with whom it comes into contact with, with particular reference to users' access to services provided.

The members of the corporate governance organs, administration, and the employees, collaborators and consultants of the Institute in general must comply, in performing their respective professional duties, with the principle of propriety and impartiality, thus avoiding preferring or facilitating persons or solutions not based on clinical or organisational technical-professional evaluations.

### **2.1.5 Transparency and confidentiality**

CCM and its collaborators undertake to give complete, transparent, comprehensible and accurate information such that those who intend to enter into relationships with the Institute are able to take autonomous decisions in the knowledge of the interests involved and the relevant consequences.

CCM assures confidentiality of the information in its possession and refrains from seeking confidential information, unless in the case of express and knowledgeable authorisation and conformity to current legal requirements.

Furthermore the Institute employees, collaborators and consultants are required to maintain the confidentiality of such private information acquired from customers in any event. Therefore, confidential information that they become aware of may not be revealed to third parties or used improperly.

CCM absolutely guarantees respect for the confidentiality of personal data and information regarding diagnosis and treatment.

### **2.1.6 Democracy and respect for the individual**

CCM considers the individual, his/her values and rights as intangible values to be safeguarded.

Institute employees and collaborators have the broadest freedom of expression of their ideas and beliefs, in respect of corporate rules, the rights and dignity of others and harmonious sharing of workplaces.

The criteria of correctness, collaboration, loyalty and mutual respect must also form relationships with third parties external to the Institute.

### **2.1.7 Value of human resources**

CCM promotes the value of human resources in order to improve and enlarge the skills held by each person, as well as collaboration and interdisciplinary exchange.

The ethos of CCM human resources management has always been based on respect for the person in the most complete meaning, regarding the ethical aspect of the relationship, absence of discrimination, transparency, promoting individual responsibility, and trust. These values are applied fully in innovative management systems for integration between the various roles and professions, enhancement and recognition of individual contributions and career development.

### **2.1.8 Culture of risk**

CCM promotes in its employees and collaborators an awareness of the risks underlying their daily activities. This knowledge must be evident in the conduct of each individual.

The internal system of monitoring and control systematically oversees these risks without detrimental overlaps or discrepancies.

## 2.1.9 Image

The image and reputation of CCM are values to be protected and developed via full dissemination, sharing and observance of the ethical principles set out in this Code.

Employees, collaborators and consultants of the Institute must refrain from any behaviour that might be detrimental the image of the CCM.

## 2.1.10 Gifts, presents and benefits

It is permitted to accept gifts or other forms of presents only if of modest value and not that could be interpreted, by an impartial observer, as exceeding normal commercial practices or courtesy. They must not in any event be intended for gaining an advantage in the conduct of any activity that can be associated with CCM. Any form of gift to Italian or overseas public officials in particular, and to their relatives, which may influence their independent judgement or achieve any advantage is also prohibited.

This rule concerns both gifts promised or offered or those received; note that a gift can refer to any type of benefit.

Gifts offered, unless of modest value, must be documented appropriately to enable verifications and authorisation by the Institute administration.

Invites to participate in events, conferences, conventions, commercial presentations or technical courses regarding the working activity must be authorised by the Hospital Administration.

CCM employees and all personnel who collaborate with it for whatever reason, who receive gifts, presents or benefits are required to observe the *Regulations on prevention of conflict of interest and intellectual property rights*.

## 2.1.11 Lawful competition

CCM operates according to the rules of lawful competition, which are deemed fundamental for market development and for meeting the needs of the recipients of the services.

## 2.1.12 Privacy protection

CCM has put in place all the requirements and has adopted all the security measures prescribed by Legislative decree 196/2003 (Guideline PR 009 – “Rules of conduct for the protection of privacy”). The privacy of patients, employees, collaborators, consultants and partners is protected by adopting standards that specify the information that the Institute requires from them and the associated processing and storage methods. These standards also prescribe prohibition, unless in the scenarios envisaged by the law, of communicating/disseminating personal data without the prior consent of the interested parties, and establish rules for control, by the interested parties, over the privacy protection standards.

## 2.1.13 Rules against money-laundering

The members of the boards of administration and control, employees and collaborators of CCM are required to comply with all standards and provisions, whether national or international, and internal procedures against money-laundering.

## **2.2 Recipients of the Code of Ethics**

The rules of the Code of Ethics apply to all employees, University personnel and all personnel who cooperate towards the Institute's objectives.

The members of the Board of Directors and the executives of Monzino CARDIOLOGY Centre are required to act based on the ethical standards prescribed by this Code. They must act in order to represent, by their behaviour, an example for their employees and collaborators and to demonstrate that compliance with the Code is an essential aspect of the quality of their work.

## **3 CRITERIA FOR CONDUCT IN EXTERNAL RELATIONSHIPS**

### **3.1 Patients**

All employees and collaborators are required to adopt conduct and procedures for personalisation and humanity in patient relations, to improve the methods for access to and information on the services.

As part of the supply of the services, employees and collaborators are required to act according to legal, ethical and financial standards that protect patients' rights, according to the principles of equality, impartiality, continuity, right of choice, privacy and confidentiality.

All employees and collaborators must comply scrupulously with the CCM procedures that set out the primary processes for ensuring uniform level of accessibility and support for all patients and maintaining clinical documents, according to the standards of institutional accreditation and current regulations.

Privacy and confidentiality standards must even be observed following termination of the employment or collaboration relationship. Each department manager must satisfy him/herself that all employees and collaborators are aware of the collective and individual responsibilities regarding any violation of privacy and confidentiality and must act to ensure that all are aware of, and practice, the security measures that the Institute has adopted.

### **3.2 Suppliers**

CCM complies with the principles of this Code and corporate procedures in all commercial relationships with its suppliers.

The Institute's policy is to negotiate transparently and in good faith with all potential suppliers in order to avoid even the semblance of undue partial negotiations or any logic justified by favouritism or led by the certainty or hope of obtaining improper advantages, including with reference to situations external to the supply relationship.

Employees responsible for managing relationships with the Institute's suppliers are required to consider any entity/individual having the necessary requirements for competing to be awarded contracts, by adopting objective and documentable criteria in selecting the shortlist of candidates.

Entering into a contract with a supplier must always be based on extreme clarity, avoiding all forms of dependence where possible.

### **3.3 Collaborators and consultants**

CCM collaborators and consultants, acting in whatever form, are required to act with propriety, good faith and lawfulness, in compliance with the provisions of this Code of Ethics, corporate regulations and instructions and requirements provided by the Institute personnel, where applicable, in fulfilling the contractual relationship established with or the assignment received from the Institute.

CCM identifies and selects collaborators and consultants with absolute impartiality, autonomy and independence of judgement without accepting any condition or compromise of any type for achieving or obtaining favours or advantages. Therefore the Institute, with reference to the assignment to be granted, shall solely consider the professional competence, reputation, independence, organisational capacity, propriety and prompt fulfilment of the contractual obligations assigned.

### **3.4 Public Authority and Investor relations**

CCM complies stringently with European, national, international and the relevant internal regulations in dealings with the Public Authorities or with entities that carry out activities of public benefit or interest.

In general terms, relationships with the public authorities or with entities that carry out activities of public benefit must be conducted with the maximum propriety, integrity, impartiality and independence, even avoiding giving the impression of wishing to influence the decisions of the contractor improperly or requesting favours. In the aforesaid relationships and in relationships with investors, the hospital departments responsible and authorised for them are prohibited from promising, giving or receiving favours, amounts or benefits in kind, which have the purpose of obtaining improper advantages.

Employees or collaborators who receive instructions to act in such a way are required to notify the Supervisory Board immediately.

### **3.5 Relations with the community**

#### **3.5.1 Responsibilities to the community**

CCM is “aware of the influence”, including indirect, that its activities may have on the conditions, economic and social development and general health of the community, and the importance of social acceptance of the community in which it operates.

For this reason the Institute intends to conduct its investment in respect of local and national communities, and to support initiatives of scientific and social value for the continual improvement of its reputation and social acceptance.

#### **3.5.2 Print and other mass communication methods**

CCM enters into relationships with press and mass communication entities solely via the delegated institution organs and departments, and according to the principles of propriety, availability and transparency, as part of the communication policy defined by the Institute.

CCM employees and collaborators may not provide mass communication entities with information without the prior and specific authorisation of the Hospital Administration.

The Institute opposes and rejects any form of misinformation or inaccurate, incomplete dissemination of information regarding the Institute and its operations, and implements all initiatives aimed at protecting its image and guaranteeing the accuracy of information.

### **3.5.3 Political and union organisations**

CCM makes no type of contribution, direct or indirect, to political parties, movements, political and union committees and organisations, nor to their representatives and candidates unless in the forms and methods envisaged by current regulations.

### **3.5.4 Environmental protection**

The environment is a primary asset that the CCM undertakes to protect.

To this end, decisions are guided and operations managed in order to guarantee a balance between socio-economic initiatives and environmental needs, not only according to current regulations but also in consideration of the development of scientific research and the best relevant experience.

## **4 CRITERIA FOR CONDUCT IN INTERNAL RELATIONSHIPS**

### **4.1 Shareholders and the administration**

#### **4.1.1 Capital**

CCM undertakes to protect its capital, in all of its components, to avoid losses, theft and damage.

The assets forming part of the Institute's capital may be used solely for purposes associated with the business activity and never for illegal activities.

#### **4.1.2 Healthcare operations**

CCM undertakes to observe the rules of keeping correct clinical records according to the criteria indicated by the law and regional provisions.

Employees and collaborators are required to comply with current regulations and institute procedures in keeping documents regarding the care of patients.

Institute employees and collaborators are required to act with transparency and provide the Healthcare Administration with the maximum collaboration in audits and inspections.

#### **4.1.3 Accounting**

CCM undertakes to observe the rules of correct, complete and transparent accounting according to the criteria indicated by the law and the adopted accounting standards.

Employees and collaborators are required to comply with current regulations and institute procedures for accounting, preserving documentation for supporting the activity carried out in order to facilitate accounting, identification of the various levels of responsibility and accurate reconstruction of the transactional, thereby reducing the probability of errors of interpretation.

Each transaction must, in other words, be correctly recorded, authorised, verifiable, legitimate, coherent and appropriate.

Institute employees and collaborators are required to act with transparency in dealings with the appointed auditing firm and the Board of Auditors and to provide maximum collaboration in performing the respective scrutiny and auditing.

#### **4.1.4 Internal auditing**

CCM promotes the dissemination of the culture of auditing and informing employees and collaborators on the importance of auditing systems and compliance, in performing Institute activities, with current regulations and internal procedures.

The Institute asserts that the organisation and the activity of the internal auditing staff is performed with the broadest autonomy and according to the principles of confidentiality, independence, correctness and the provisions of this Code.

Employees and collaborators of the Institute are required to cooperate in the correct and efficient operation of the internal auditing system, forming an active part of reporting of situations of interest to the internal auditing department and committing to disseminate the principles promoted by that department.

Each department of the Medical Administration and administration coordination assure the effectiveness of the internal auditing system, organise periodic inspections and draw up reports, initiate or propose any corrective actions.

#### **4.1.5 Supervision and control authority**

CCM undertakes to offer the maximum cooperation in dealings with the Supervision and control authorities, fully according to its institutional role, undertaking promptly to implement regulatory provisions issued by the aforesaid Authorities and to provide correct, verifiable, clear and exhaustive information and data, periodically or on request.

### **4.2 Personnel**

#### **4.2.1 Mutual respect**

It is CCM's policy to promote an internal climate where each employee interacts with other colleagues with mutual honesty, dignity and respect. This internal working environment is made up of working groups comprising individuals openly communicating to facilitate the achievement of the Institute's goals and objectives, and promoting creativity and individual growth.

#### **4.2.2 Ethical conduct**

Each individual is required to perform his or her roles in a responsible, honest, diligent way and with good judgement, in accordance with the procedures and directives set out by the Institute. CCM aims to conform to the highest ethical standards in conducting its business activities and requires its collaborators to avoid situations of conflict of interest or other situations that may potentially be damaging for the Institute, rejecting even the mere semblance of loss of integrity.

#### **4.2.3 Employee selection**

Potential employees are evaluated based on the candidate meeting Institute requirements, according to the provisions of art. 12 of Legislative decree 288/2003 and equal opportunities for all individuals concerned. The information required is strictly related to verifying the expected aspects from the professional and psycho-attitudinal profile, in respect of privacy and the opinions of the candidate. The Human Resources Service, given the information available to it, shall adopt appropriate measures to avoid favouritism, nepotism or forms of clientelism at the selection and hiring stages (e.g. avoiding the selector being related to the candidate).

#### **4.2.4 Establishing the employment relationship**

Employees are taken on with a regular employment contract, in full accordance with legal provisions.

Each employee shall receive accurate information regarding the following upon employment:

- the specifications of the role and the duties to be undertaken;
- the elements of regulation and remuneration, in accordance with the national collective labour agreement;
- the rules and procedures to be adopted in order to avoid possible risks to health associated with the working activity;
- regulations of Legislative decree 231/2001 and the associated Organisation, management and control model;
- the regulations regarding privacy;
- a copy of this Code;

in order to ensure that accepting the role is based on an effective understanding of the employee's duties and rights.

#### **4.2.5 Personnel management**

The Monzino CARDIOLOGY Centre avoids discrimination against its employees. As part of the processes for the management and training of personnel, and also during selection, decisions taken are based on the requirements corresponding with the characteristics of employees and/or considerations of merit. Access to roles and posts is also in consideration of competences and abilities. In addition, according to the general efficiency of work, flexibility in organising work to facilitate maternity and childcare in general is adopted. Employees are appraised in a broad sense by involving managers, the personnel department and, where possible, the individuals who come into contact with the person concerned.

- ***Dissemination of personnel policies***

The personnel management policies are available to all employees via the institute communication instruments (management policies and communications documents).

- ***Training and development of employees***

CCM ensures that its employees are appropriate to the functions they carry out and professionally qualified by implementing the levers available to promote their development and growth (e.g. job rotation, secondment to experienced personnel, experiences for covering roles of greater responsibility, *et cetera*).

Particular importance is attached to communication by managers of the employee's key strengths and weaknesses, so that he or she may attempt to improve his or her skills via targeted training. CCM provides all employees with information and training tools with the aim of developing specific skills and growing the professional value of the staff. Training, addressed at groups or individual employees based on specific professional development requirements, represents a corporate asset to be valued.

- ***Employee working time management***

Each Manager is required to optimise the working time of employees, by requiring service in line with the work organisation plans and with the fulfilment of their roles. Requesting services, personal favours or any conduct which forms a violation of this Code by a line manager as mandatory is deemed abuse of a position of authority.

- ***Involvement of employees***

Each Department Manager shall assure employee involvement in carrying out work, which includes participating in discussions and decisions functional to the achievement of Institute objectives. Employees must participate with a spirit of collaboration and independence of judgement. Listening to the various points of view, as compatible with hospital requirements, allows the Manager to formulate final decisions. The employee must always act diligently in implementing the activities ordered by the Manager.

- ***Work organisation interventions***

Constant improvement of the service requires continual verification and updating of the organisation of the work to protect the value of human resources and prevent, where necessary, training and/or professional requalification activities.

#### **4.2.6 Health and safety**

CCM provides a working environment compliant with current health and safety regulations via the monitoring, management and prevention of risks associated with the performance of the professional activity.

The Institute also undertakes to disseminate and consolidate a culture of safety by developing awareness of risks and promoting responsible conduct by all employees, including via specific training interventions.

#### **4.2.7 Integrity and protection of the person**

CCM undertakes to protect the moral integrity of employees by guaranteeing the right to working conditions that respect the dignity of the person. For this reason it protects workers from undue psychological intimidation and opposes any discriminatory attitude or conduct that is harmful to the person, his/her beliefs and preferences (e.g. in the case of offence, threats, isolation or excessive avoidance, professional limitations). Sexual harassment is severely condemned and conduct or dialogue that can disturb a person's sensitivity must be avoided (e.g. exposure to images with explicit sexual references, determined and continued insinuation).

As limited by available information and *privacy* protection, the Institute actively prevents all forms of workplace harassment and bullying.

A CCM employee who feels he/she has been the subject of harassment or whose age, sex, sexuality, race, health status, nationality, political opinions or religious beliefs have been discriminated against, may report the event to the Human Resources Service, which will evaluate effective violation of this Code and propose any appropriate measures.

Disparities are not however considered discrimination if justified or justifiable according to objective criteria.

#### **4.2.8 Duties of employees**

An employee must act lawfully in order to comply with the obligations undertaken in the employment contract and the provisions of this Code, assuring the required fulfilments.

- ***Data management***

An employee must know and implement the provisions of institute policies regarding security of information for guaranteeing the integrity, privacy and availability of data. He/she is required to complete his/her documents using clear, objective and exhaustive language, enabling any verifications by internal or external entities authorised to request them.

- ***Conflict of interest***

All CCM employees are required to avoid situations in which a conflict of interest may arise and refrain from taking personal advantage of business opportunities which they become aware of while fulfilling their role.

Even where conflict of interest is merely apparent, the employee is required to promptly inform his/her Manager and the Human Resources Service (see the Regulations on Prevention of Conflicts of Interest).

- ***Use of Institute assets***

Each employee is required to act with diligence to protect Institute assets, via behaviour that is responsible and in line with the relevant operating procedures, documenting such use precisely. More specifically, each employee must:

- use the assets assigned to him/her scrupulously and frugally;
- avoid improper use of Institute assets which may cause damage or reduce efficiency, or that is in any event contrary to the Institute's interests.

Each employee is responsible for the protection of the resources assigned to him/her and has the duty of promptly informing the relevant departments of any threats or events which are damaging for the Institute.

As regards IT applications, each employee is required:

- scrupulously to adopt the provisions of the Institute security policies, in order not to compromise the functionality and protection of IT systems;
- not to send harmful or threatening e-mail messages, or use inappropriate language or comments that may cause offence to the person and/or damage the Institute's image;
- not to browse Internet sites with inappropriate or offensive content and in any event not relevant to the associated institutional activities.

#### **4.2.9 Intellectual property rights**

Intellectual property rights deriving from inventions developed as part of working activities belong to CCM, which retains the right to use these inventions according to methods and times considered most appropriate, in accordance with current regulations.

Rules are provided in any event for this issue in section 4. (Inventions, patents and technological transfer) of the *Regulations for the Prevention of Conflicts of interest and Intellectual Property Rights*.

## **5. SUPERVISION OF THE APPLICATION OF THE CODE OF ETHICS AND CONSEQUENCES OF ITS VIOLATION**

### **5.1 Board of Supervision and Ethics Committee for research**

CCM has established an internal Supervisory board with autonomous powers of initiative and control and has been assigned the role of supervising the operation and observance of the Organisational, management and control model *ex* Legislative decree 231/2001, and the task of systematically updating it.

The Board of Supervision is also assigned the role of verifying coherence of the Code of Ethics with the Model adopted.

The Institute has also established an Ethics Committee, an independent body which evaluates and verifies the conduct of studies of new diagnostic and treatment methods and oversees correct operation of research programmes and patient protection.

## **5.2 Reports of Code violations**

The Department Managers are responsible for reporting any violations of the Code of Ethics to the Human Resources Service or the General Administration.

CCM employees and collaborators, and the parties who intend to report a violation of the Code of Ethics may send an appropriate written report to the Board of Supervision, or to the General Administration or to the Scientific Administration, which are required to inform the Board of Supervision in any event.

CCM opposes and rejects all forms of discrimination or reprisal against employees, collaborators or third parties who report a violation of the Code.

Any groundless report submitted itself represents a violation of the Code of Ethics.

## **5.3 Actions against employees**

For violation of the Code of Ethics by employees, the Hospital Administration shall evaluate the facts and conduct and apply the most appropriate measures against those responsible in accordance with the provisions of the hospital regulations and the National Collective Labour Contracts, without affecting the possibility of open liability proceedings and claims for damage compensation.

The Human Resources Service or the General Administration are responsible for verification of infractions, disciplinary disputes and disciplinary proceedings.

## **5.4 Actions against collaborators, consultants and contractors**

For violations of the Code of Ethics by Consultants, Collaborators and Contractors, CCM shall evaluate the facts and conduct and potentially shall terminate the contract without affecting any potential claim for compensation of damages where such conduct causes losses for the Institute, regardless of termination of the contract.