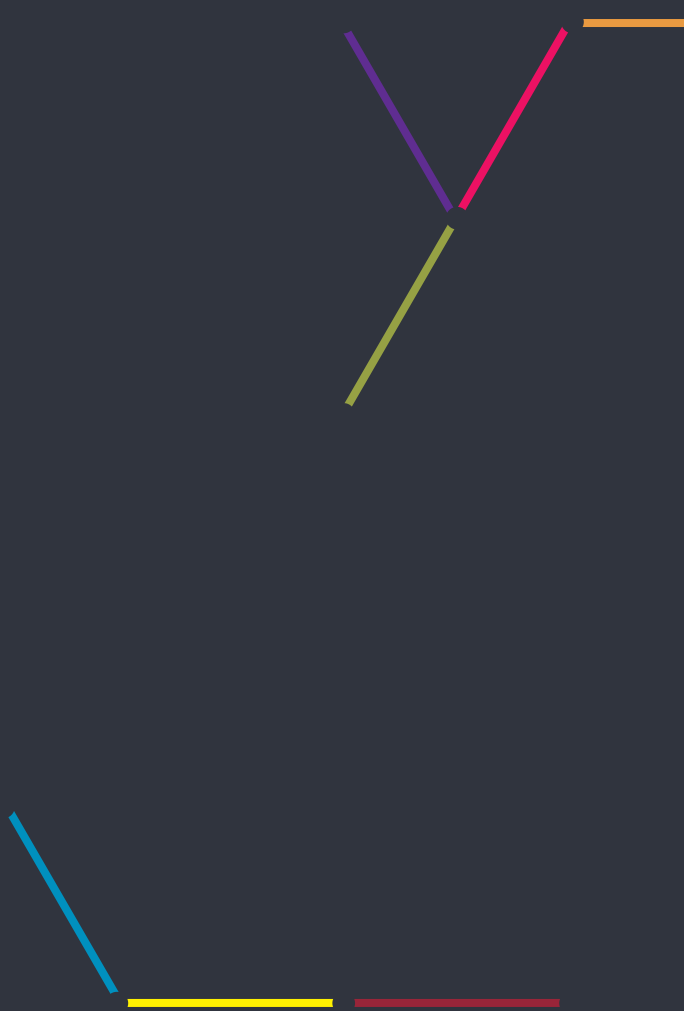


**CODE
OF BEHAVIOR
AND SCIENTIFIC
CONDUCT**



Code of Behavior and Scientific Conduct

for the Fondazione Istituto Italiano di Tecnologia

(Version approved by the Executive Committee on 21 December 2022)

Table of contents

5	PREAMBLE
6	Adoption of the Code
6	Main regulatory references
7	Recipients and dissemination of the Code
9	SECTION I: GENERAL PRINCIPLES
10	A. THE MISSION AND VISION OF THE FOUNDATION
11	B. OUR VALUES
13	C. ADDITIONAL CORE VALUES
14	D. GENERAL PRINCIPLES
14	Compliance with laws and regulations
14	Compliance with the Foundation's organizational procedures
14	Compliance with delegated powers and mandates
14	Use of confidential information
15	Sanctions
15	Confidentiality
17	SECTION II: RULES OF CONDUCT
19	A. RULES OF CONDUCT FOR CONFLICTS OF INTEREST AND INCOMPATIBILITY OF MANDATES
19	Conflicts of interest
19	Ethics Committee
19	Duty not to compete
19	Duty to abstain
20	Duty of transparency
21	Secondary activities
22	Participation in associations and organizations
22	Incompatibility of mandates
24	B. GENERAL RULES OF CONDUCT
24	Gifts and free services
25	Participation in conferences, seminars, and training courses financed by Foundation suppliers
25	Funding of doctoral scholarships
25	Protection of the Foundation's assets
25	Transparency of accounts and corporate communication
26	Tax and customs compliance
26	Money-related compliance and ethics
27	Purchasing
27	Information Security
28	Copyright protection
29	Internal controls
29	Anti-corruption

32	C. RELATIONS BETWEEN EMPLOYEES, COLLABORATORS, AND CONSULTANTS
32	Equal opportunities, diversity, and inclusion
33	Combating harassment, sexual harassment, and bullying
34	Duty of loyalty
35	Occupational health and safety
35	Internal and external communication at IIT
35	Conscious use of social media
36	Conscious use of e-mail
36	Possession of pornographic material
36	Illegal immigration
37	D. RELATIONS WITH SUPPLIERS
37	E. RELATIONS WITH ORGANIZATIONS, INSTITUTIONS, RESEARCH CENTERS, AND UNIVERSITIES
38	F. RELATIONS WITH THE PUBLIC ADMINISTRATION
38	G. RELATIONS WITH GOVERNANCE BODIES
39	H. ENVIRONMENT AND PROTECTION OF ANIMAL SPECIES
39	I. PROTECTION OF CULTURAL AND LANDSCAPE HERITAGE
41	SECTION III: GUIDELINES FOR SCIENTIFIC CONDUCT
44	Scientific misconduct
44	Moral rights of intellectual authorship
46	IIT affiliation
46	Collegiality in research
46	Management of data and databases
47	“Abandonment” by a researcher
47	Research supervision
48	Promotion of start-ups and management of relationships with researchers and scientific staff
48	Control of dual-use products
51	SECTION IV: SUPERVISION, REPORTING, AND DISCIPLINARY SYSTEM
52	A. PROCEDURE FOR REPORTING VIOLATIONS
52	General principles
52	Roles and responsibilities
52	The reporting process
53	Flow chart: Flow reporting violations
54	B. THE DISCIPLINARY AND SANCTIONS SYSTEM

Preamble



Adoption of the Code

The Fondazione Istituto Italiano di Tecnologia (hereinafter the “Foundation” or the “Institute” or “IIT”) has deemed it appropriate to adopt this Code of Behavior and Scientific Conduct (hereinafter the “Code”) in order to outline for the recipients (as defined below) the general ethical principles and rules of conduct with which all Foundation activities must comply.

The Code identifies the principles of conduct and the guidelines that must inspire the behavior of all those who, in various ways, are related to and work in the interest of the Foundation. The Code is divided into four sections: (i) general principles; (ii) rules of conduct; (iii) guidelines for scientific conduct; (iv) supervision, reporting, and disciplinary system.

This Code is a fundamental pillar of the internal control and risk management system, an integral part of the Organization and Management Model (hereinafter the “**Model 231**”), and of the other prevention systems, policies, and internal regulations adopted by the Foundation.

Any modifications and/or additions to this Code must be made following the same procedures as those adopted for its approval.

Main regulatory references

This Code is inspired by the law that established IIT (Law 269/2003) and by the main national and international guidelines on human rights, corporate social responsibility, and corporate governance:

- the European Charter for Researchers;
- the United Nations’ Universal Declaration of Human Rights;
- the United Nations’ Convention on the rights of the child;
- the United Nations’ Convention on the elimination of all forms of discrimination against women;
- the Principles of the UN Global Compact;
- the 8 fundamental Conventions of the ILO (International Labor Organization);
- the OECD (Organization for Economic Co-operation and Development) Guidelines for multinational enterprises;
- the European Union’s Charter of Fundamental Rights;
- the Corporate Governance Code of Borsa Italiana;
- the Charter of Corporate Values of the European Institute for Social Reporting.



Recipients and dissemination of the Code

The provisions of the Code are addressed to the following recipients (hereinafter the “**Recipients**”):

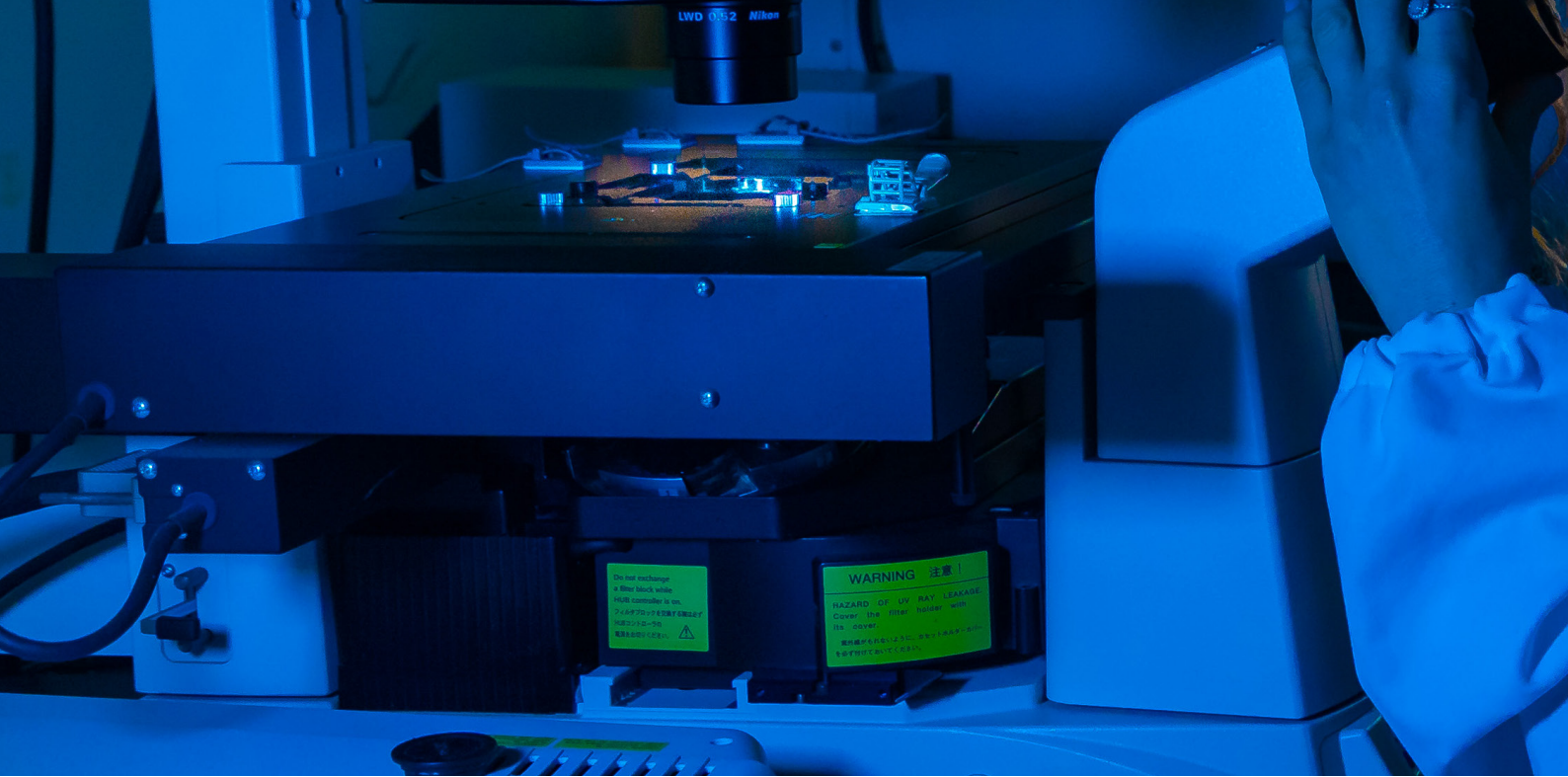
- members of the Foundation’s governance bodies, monocratic and collegial, and members of the bodies and committees of any kind established within the Foundation;
- employees, collaborators, and consultants, each in compliance with their existing contractual relationship with the Foundation and in line with the level of autonomy envisaged by the agreed assignment;
- students, doctoral students, and affiliated researchers;
- trainees, fellows, and similar figures;
- third parties who have contractual relationships, other than those listed above, with the Foundation.

All Recipients, regardless of their role and activity within or on behalf of the Foundation, are required to follow and, within the scope of their responsibilities, enforce all the principles and rules of conduct set out in the Code, in order to support the smooth running, reliability, and good reputation of the Foundation.

The Foundation undertakes to promote the dissemination, knowledge, and sharing of the principles set out in the Code by those who work in the Institute and by other stakeholders, so that these principles and behaviors form the pillars of a culture inspired by sustainable development and guide the Recipients’ conduct on a day-to-day basis.

Section I

General Principles



A. The mission and Vision of the Foundation

IIT and its mission

The Foundation's goal is to stimulate Italy's technological development and advanced technological training, in line with guidelines derived from the country's scientific and technological policy, thus fostering the development of Italy's production system.

Vision

Through research, the Foundation aims to develop scientific and technological knowledge that increases the value of human capital with an approach that merges different skills and abilities in a truly interdisciplinary synthesis. The initiatives promoted by IIT aim to tackle major societal challenges, such as sustainable development and, with reference to people, healthcare and the aging population.



B. Our Values

The Foundation's success is inextricably linked to our founding values.

Inclusion

The IIT Foundation considers respect for each individual's physical, mental, and cultural integrity to be fundamentally important. We welcome and cherish diversity in all its forms. We are committed to respecting differences in gender, age, nationality, political opinion, religious belief, and ability. We do not tolerate any type of discrimination.

Integrity

The Foundation considers it fundamental to act with scientific and moral integrity. IIT is particularly focused on transparency in communicating and administrating its activities and related processes. IIT asks all Code recipients to behave honestly and in good faith, and to bring these values to their relationships with third parties and activities conducted in the name of or on behalf of the Foundation.

Courage

The Foundation and its individuals are committed to facing challenges with determination. The Institute's activities are geared toward promoting excellence in basic and applied research and fostering the development of Italy's economic system.

Social responsibility

The Foundation believes it is fundamentally important to protect future generations by safeguarding the environment and pursuing sustainable development. With our Environmental Policy, IIT is therefore committed to adopting strategies and techniques that improve the environmental impact of our activities. This begins with compliance with current regulations, but also includes the development of scientific research and best practices.



C. Additional Core Values

Efficient, effective, and financially sound management

IIT is committed to operating effectively and efficiently, ensuring financially sound management. The Foundation uses its resources transparently, periodically collecting and publishing key metrics of its operations.

Steadfast commitment to research and innovation

IIT considers excellence in research and development to be a fundamental value. Thanks to state-of-the-art scientific infrastructure, transparent international assessment, and a high-quality international environment, IIT is a “place of opportunity” for interdisciplinary research. IIT is committed to conducting scientific research that effectively addresses societal and ethical challenges in order to develop a society for the common good.

Legitimacy and appropriateness

IIT asks Code Recipients to carry out every assigned activity, operation, and/or transaction in compliance with their duties and delegated proxies, powers, and mandates, and to guarantee traceability, so that it is possible to monitor the type of operation/activity, how and why it was conducted, and with what authorization.

Diligence and professionalism

IIT promotes the diligence and professionalism of its people, whom it asks to work with commitment and dedication, conducting their activities to benefit science, technological development, and society in general. IIT asks its employees, collaborators, students, doctoral students, affiliated researchers, fellows, and similar figures to behave ethically, adopting the best practices for research and complying with this Code of Conduct and the current laws and regulations.

These broad cross-cutting values must be considered fundamental to all decisions and conduct.

The Foundation is a research center that operates according to international standards and with the coexistence of two strongly connected and comprehensively international components:

- the scientists, whose work ensures that the Institute’s founding mission is achieved;
- the administrative and research support division, which operates in accordance with regulations and good management practices, often working with internal and external stakeholders.

These two components engage in unified collective action, operating synergistically to meet shared goals. The above values are embedded within a series of initiatives aimed at strengthening each individual’s sense of belonging to the IIT community.

D. General Principles

In putting the above system of values into practice, the Recipients of this Code are required to:

- operate with honesty, integrity, good faith, and transparency in their dealings with public administrations, institutions, suppliers, consultants, entities, and companies that have contractual or working relationships with the Foundation, and to act with independence and impartiality and abstain when there is a conflict of interest;
- observe the legal provisions of the judicial systems in which the Foundation operates, and comply with the procedures, guidelines, and information that the Institute approves and disseminates from time to time;
- abide by contractual commitments, even if the relationship is not strictly one of employment but of collaboration.

Compliance with laws and regulations

Recipients are obliged to comply with the laws and, in general, current regulations, agreements, and international standards, and with the administrative and political practices of the states in which the Foundation operates.

Compliance with the Foundation's organizational procedures

In performing their duties and in line with their job description, Recipients are obliged to comply with bylaws, internal regulations, Model 231, the Addendum pursuant to Law 190/2012, and the Foundation's internal policies and procedures, and to implement the Foundation's regulatory obligations.

Compliance with delegated powers and mandates

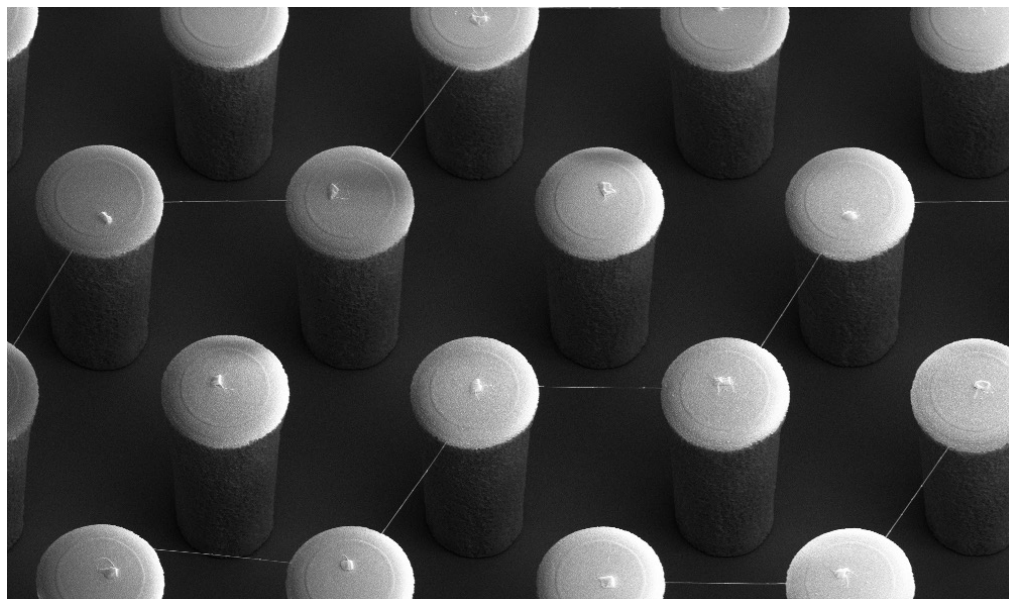
Recipients who act on behalf of the Foundation by virtue of delegated mandates or proxies must act within the limits of and in compliance with the same. Outside of these limits, such Recipients are forbidden from creating obligations for the Institute or making it appear that they can create such obligations in performing their duties and functions.

Use of confidential information

Confidential information and documents, personal data about employees and individuals with whom the Foundation has contractual relationships, work projects, know-how, and technological processes must be guarded, protected, and kept confidential with regard to both third parties and colleagues who do not have direct access to said information. Individuals who have access to this information for work reasons must handle it in accordance with the instructions and procedures established by the Institute. Should third parties deliberately or fraudulently try to obtain confidential information restricted to employees or otherwise become aware of said information, then Recipients are obliged to promptly notify the Foundation via their direct line manager. Recipients are obliged to process personal data in accordance with the principles of lawfulness, fairness, transparency, and confidentiality, which are established by the provisions on data protection in accordance with current regulations. In particular, employees who are not expressly authorized, in the forms and terms set forth in Legislative Decree No. 196/2003 (Code on the Processing of Personal Data), as amended by Legislative Decree No. 101/2018, and the General Data Protection Regulation No. 2016/679, are prohibited from knowing, recording, processing, and disclosing the personal data of other employees or third parties

Sanctions

Those in violation will be subject to the administrative and criminal sanctions established by the aforementioned regulations. Employees will also be subject to disciplinary sanctions as per the Institute's general personnel regulations¹. With regard to consultants and collaborators, IIT reserves the right to terminate the relevant contracts/assignments.



Confidentiality

The Recipients of this Code are obliged to maintain the confidentiality of all technical, legal, scientific, and/or technology transfer development information or information related to the Foundation's operations more generally, of which they become aware by reason of their office or mandate.

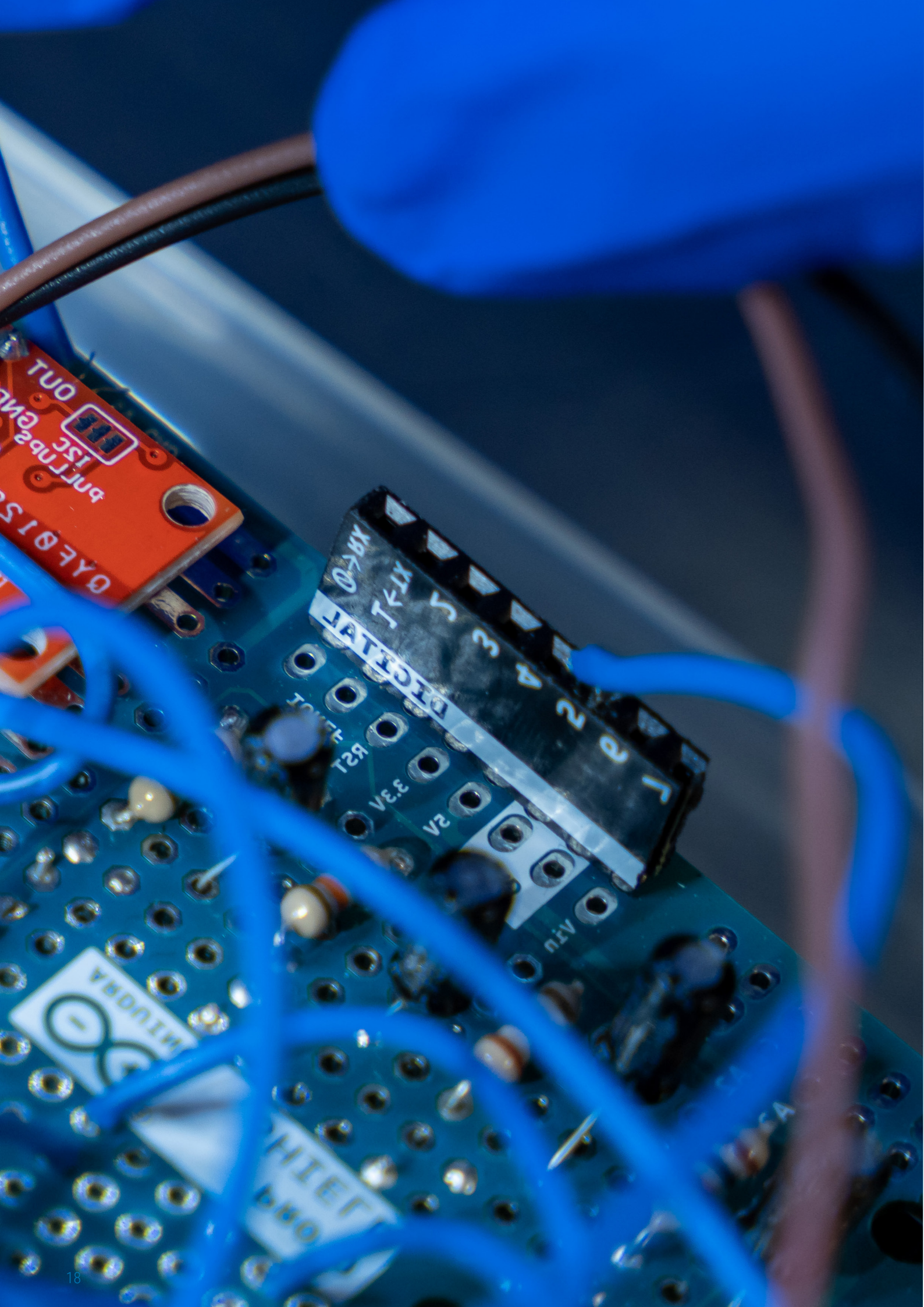
Examples of "Confidential Information" include:

- i. any technical and/or scientific and/or commercial and/or economic/financial or legal information, including but not limited to any document, drawing, draft or project, material, technical note, protocol, memorandum, agreement, formula, sample, or product prototype, disclosed within the scope of the Recipients' activities, communicated verbally, in writing, or through any other means, including electronic, either directly by the functionaries of the Foundation or via its consultants;
- ii. agreements, correspondence, analyses, outlines, studies, and all other documents prepared within the scope of the activities of the Governance Bodies or the functionaries of the Foundation for the ordinary or extraordinary management of its activities;
- iii. any analyses, extrapolations, summaries, documents, studies and/or deductions created for (or arising from) discussion at the meetings of the Foundation's Governance Bodies or various established committees;
- iv. any other information (in written, oral, computer-based, or other form) of a non-public and confidential nature and of any kind that may relate to the Foundation's activities and its governance bodies such as, but not limited to, a formula, sample, product prototype, financial information, commercial information, information related to scientific projects, intellectual property, products and/or services, or more generally, to the Foundation's activities.

¹ At the date of approval of this document, the personnel regulations apply to all employees at the non-executive level..

Section II

Rules of Conduct



A. Rules of Conduct for Conflicts of Interest and Incompatibility of Mandates

Conflict of interest

In line with the values of honesty and fairness, the Foundation is committed to implementing measures to prevent and avoid conflicts of interest.

Recipients identified in the special “Procedure for managing conflicts of interest” must maintain a position of independence when performing their duties. This is to avoid making decisions or acting in situations where there is or appears to be a conflict of interest².

Any situation that may create a conflict with the Foundation’s interests must be promptly reported to the department responsible for managing such situations in accordance with the Foundation’s rules. Furthermore, the person in the potential conflict-of-interest situation must refrain from participating in decisions that could make the aforementioned conflict manifest.

The Foundation is committed to identifying and managing conflicts of interest via a special procedure, which it will outline and publicize in full from the start to the finish of the investigation conducted by those responsible for collecting and managing the reports.

Ethics Committee

An Ethics Committee is responsible for assessing any conflicts of interest involving Recipients, as set out in the “Conflicts of interest procedure”.

The Ethics Committee comprises three external and independent members with different expertise, appointed by the Foundation’s Board following the President’s recommendation.

The Ethics Committee periodically reports to the Board on its activity.

Duty not to compete

The Recipients undertake not to accept or carry out on their own behalf or on behalf of third parties, natural or legal persons, any assignment to perform activities that are in competition with the Foundation’s activities.

Duty to abstain

Each Recipient must refrain from participating in any type of decision (i.e. evaluation of researchers, assignment of research funds, authorization to carry out missions, allocation of machine time, etc.) or activity that may directly or indirectly involve their own economic or non-economic interests or those of someone connected to them.

The rules governing this duty are set out in detail in the special “Procedure for managing conflicts of interest”.

Furthermore and only with respect to recruitment searches for and selection of researchers, research group heads have a duty to abstain if there are internal candidates who are involved with their research line.

²‘Conflict of interest’ means any situation where a person or someone connected to that person has a secondary interest that interferes with the Foundation’s primary interest in the context of the relevant processes.

Recipients have a duty to abstain even when there are compelling circumstances of opportunity or convenience.

In particular, Recipients have a duty to abstain from any external activity that could affect IIT's activities, such as:

- performing tasks for bodies or committees responsible for financing, monitoring, and evaluating IIT's activities;
- performing tasks for committees or governing bodies and/or research centers that may be potential competitors of IIT for national or international funding calls or, in some cases, when there are strategic alliances for developing research projects of mutual interest;
- performing tasks for companies, entities, and other institutions, with which IIT could establish relationships of a commercial, financial, assisting, and/or technology transfer nature of any kind.

The intention to abstain must be expressed in writing and adequately justified by the person with the conflict of interests.

Duty of transparency

For publications, research proposals, or seminars, personnel have a duty to declare any conflict of interest connected to the scientific topic.

If deemed necessary, the Foundation is responsible for reporting to the relevant person any failure to declare a conflict of interest.

Collaborators and consultants undertake not to accept or carry out on their own behalf or on behalf of third parties, natural or legal persons, any assignment to perform activities that are in competition with the Foundation's activities. Collaborators and consultants also undertake to guarantee the impartiality of their work and to prevent possible conflicts of interest, even



if these arise from their contractual relationships - both personal and through partnerships or companies - with third parties who have commercial relationships with or economic/financial obligations to the Foundation.

Employees are required to inform IIT regularly (at the start of the relationship, including any relationships that ended in the last two years, and when there are changes in the relationship) of all paid or voluntary collaborations, specifying:

- a) whether they or their relatives up to the fourth degree of kinship or their cohabitants still have economic or financial relationships with the party with whom they have established the aforementioned collaboration;
- b) whether these relationships have existed or exist with individuals who have interests in activities or decisions relating to their assigned tasks and duties.

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

- collaborations with newspapers, magazines, encyclopedias, and similar;
- the economic use, by the author or inventor, of intellectual property or industrial inventions, other than those created on behalf of IIT;
- participation in conferences, seminars - with the exception of those organized and financed by suppliers of the Foundation (see below) - or occasional teaching activities;
- tasks for which only documented expenses are reimbursed;
- tasks for which the Employee has been placed on leave or on secondment.

The members of the boards shall disclose, in particular, any economic and financial interests that may place them in a conflict of interest with their designated role and shall also declare to the Ethics Committee whether their relatives up to the fourth degree of kinship or cohabitants are engaged in political, professional, or economic activities that involve establishing frequent contacts with the supervising Ministries or involving these Ministries in the Foundation's decisions or activities.

Secondary activities

As indicated in the "gifts and free services" section of this Code, Recipients shall not accept salaries or other benefits from parties other than IIT for performing their assigned tasks or duties. Except as provided for by current legislation, employees shall not accept collaboration assignments with natural or legal persons who have, or have had in the previous two years, an economic interest in decisions or activities falling within the scope of their responsibilities.

At the start of the collaboration, collaborators undertake to inform IIT if they have, or have had in the previous two years, collaboration assignments with third parties who have, or have had, interests in activities or decisions relating to their assigned task.

Recipients are also invited to use the e-mail address **transparency@iit.it** to promptly disclose the occurrence and/or disappearance of causes and/or situations of conflicts of interest, and to obtain clarification on the same.

Participation in associations and organizations

In compliance with current legislation, all employees and collaborators, in accordance with the provisions of their respective contracts, are required to inform IIT of any membership in associations and organizations whose interests are affected by the performance of their duties. The provisions of the previous paragraphs do not apply if the Recipients join or have joined political parties or trade unions.

Incompatibility of mandates

As established by IIT's Executive Committee, the Scientific Director, for the entire period of their mandate, may hold no executive position and no more than two non-executive positions in other companies/institutions outside of the Foundation, without prejudice to conflict-of-interest assessments and except when the additional position is necessary in order to conduct activities of interest to the Foundation. Appointments must be approved by the Executive Committee.

As also established by IIT's Executive Committee, the General Manager may hold no executive position and no more than three non-executive positions in other companies/institutions outside of the Foundation, without prejudice to conflict-of-interest assessments. Appointments must be approved by the Executive Committee.

Executive positions include, but are not limited to, Chief Executive Officer, Member of the Management Board, Chairman of the Board of Directors if this position confers management powers, Chairman of the Supervisory Board, and General Manager.

Non-executive or supervisory positions include, but are not limited to, Member of the Board of Directors without delegated powers, member of the Supervisory Board, and member of the Board of Statutory Auditors.

The offices of Scientific Director and General Manager are also incompatible with political roles, meaning the role of a national or European parliamentarian, member of the government, or member of a regional, provincial, or municipal council or trade union.

In the event of a request to exceed the permitted number of positions held, the Executive Committee will assess the situation in terms of the Foundation's interest and will notify the requesting person of the final decision.



B. General Rules of Conduct

Gifts and free services

All Recipients are prohibited from offering, promising, guaranteeing, or accepting gifts, compensation, or any other form of benefit if this is intended to influence decisions or obtain an unfair advantage, or if there is a risk of creating such an impression. Members of governance bodies and employees are prohibited from accepting gifts or other benefits for themselves or others, even on holiday occasions.

The only exceptions are acts of business courtesy and gifts of modest value (a gift worth no more than €50 could be considered modest in value) that do not compromise either party's integrity or reputation and that an impartial observer would not consider to be aimed at acquiring undue and/or improper advantage. Any other gifts must be refused or returned, and the circumstance must be reported to one's manager and to the supervisory department in accordance with procedures. Under no circumstances is it permissible to offer or accept money, discounts, or other benefits with a monetary value.

Even in countries where it is customary to offer gifts to customers or others as a sign of courtesy, such gifts or promises of gifts must be appropriate and may not conflict with the provisions of the law. Here too, the gifts must be such that an impartial observer would not consider them to be requests for favors in return.

Regarding relations with the Public Administration, please refer to the explanations and provisions in the "Anti-corruption" and "Relations with the Public Administration" sections.



Participation in conferences, seminars, and training courses financed by Foundation suppliers

Participation in conferences, seminars, or training courses organized and financed by the Foundation's suppliers must be authorized in advance by the relevant contact person or line manager so that they can follow the special procedure to assess whether this creates a conflict of interest. In any case, it is absolutely forbidden to accept invitations to events organized or sponsored by the Foundation's suppliers, where such invitations include accompanying persons or payments for travel or hospitality expenses.

Funding of doctoral scholarships

To fulfill its institutional purposes, the Foundation may also engage the services of external personnel, including but not limited to doctoral students.

In the event that IIT has a specific and concrete interest in fully or partially funding a scholarship, the Foundation shall sign a special agreement with the student's university, specifying that the Foundation shall pay the funding directly to the university, in accordance with the provisions and stipulations of the agreement and, in any case, in a manner that complies with the Foundation's policies, procedures, and guidelines.

Protection of the Foundation's assets

The Foundation's assets comprise tangible and intangible assets, including but not limited to intellectual property, software licenses, the results of work conducted by employees, collaborators, and consultants, strategically important information, and a significant amount of confidential data about various research projects, entrusted to employees, collaborators, and consultants so that they can carry out their tasks.

Protecting these assets is essential to the Foundation's life and prosperity. The loss, theft, or improper use of these assets could seriously damage the Foundation's interests and the greater interest of advanced scientific research conducted by institutions more generally.

Each employee, collaborator, and consultant is therefore responsible for maintaining and protecting the assets, tools, and information entrusted to them for the execution of their tasks, and must help safeguard all of the Institute's assets. To this end, they must comply with the Foundation's operational and security procedures.

In any case, documents pertaining to the Foundation's activities, its work tools, and any other tangible or intangible property of the Foundation must be used exclusively to fulfill the Foundation's institutional purposes and in the manner established by the Foundation, as specifically stated in the relevant policies and procedures. The employee/collaborator/consultant shall not use these assets for personal purposes or transfer or make these assets available to third parties even temporarily.

Transparency of accounts and corporate communication

The Foundation requires that every transaction is correctly recorded.

Each transaction must be supported by adequate documentation to allow checks on the characteristics and reasons for the transaction and to identify the people who authorized, conducted, recorded, and verified the transaction.

In accordance with the provisions of the Civil Code, where applicable, and with accounting

principles, the legally required financial statements, reports, and corporate communications must be prepared with clarity and transparency and correctly and truthfully represent the Foundation's assets and financial situation.

'Accounting records' mean all records that numerically represent management facts, including internal expense reimbursement notes.

All Foundation personnel involved in preparing the budget shall: i) provide clear and complete information; ii) ensure the accuracy of both the data and its processing; iii) report the presence of conflicts of interest.

In dealings with supervisory bodies, those involved must act with the utmost transparency, clarity, and fairness in order to establish a relationship of the utmost professionalism and cooperation.

It is forbidden to impede or hinder the regular performance of the activities of the Foundation's bodies and auditors, and obligatory to cooperate, when requested, in order to execute any kind of check or audit required by law.

In particular, it is prohibited to conceal documents, use other fraudulent means, or otherwise act in a way that impedes or otherwise hinders controlling or audit activities.

Tax and customs compliance

The Foundation is required to behave correctly, transparently, and in accordance with tax and customs regulations in its dealings with and declarations to tax and customs authorities.

In general, Recipients are expressly required to:

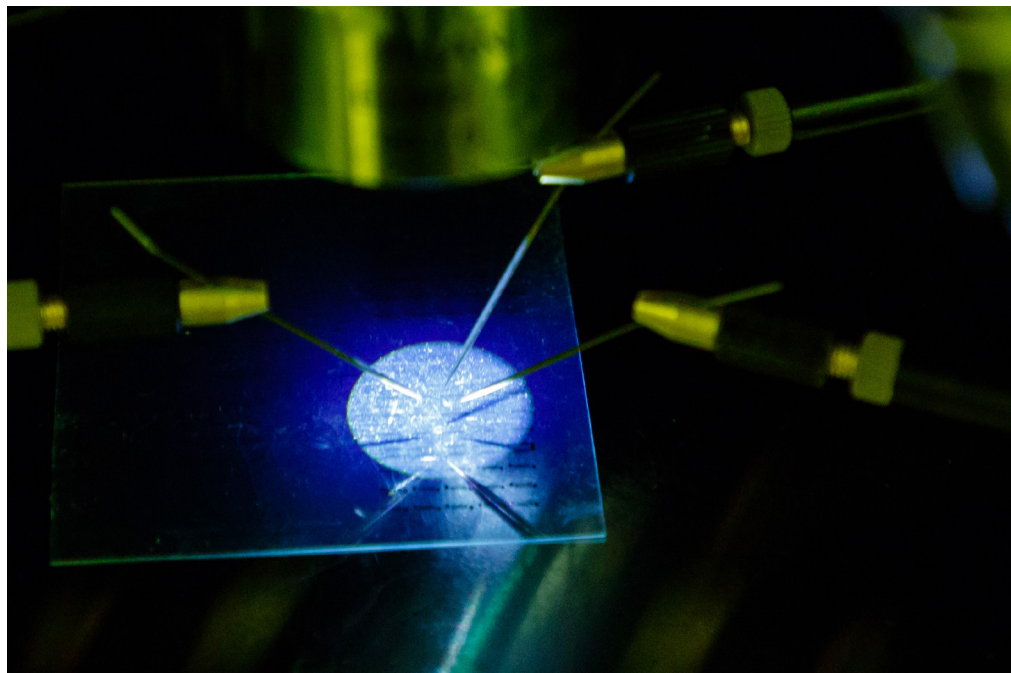
- a) behave correctly, transparently, and cooperatively toward the tax and customs authorities, in compliance with the law and the Foundation's procedures;
- b) behave correctly, transparently, and cooperatively when seeking to prepare, sign, and transmit tax and customs declarations in order to ensure the correct and timely payment of taxes due, including using the services of third parties with proven expertise and professionalism if necessary;
- c) diligently and rigorously comply with all legislative provisions on tax and customs matters;
- d) guarantee the truthfulness and completeness of the data in all accounting/fiscal declarations and in declarations or applications submitted for customs-related purposes;
- e) ensure the proper keeping and archiving of accounting records and documents that must be retained;
- f) comply, within the prescribed deadlines, with tax, fiscal, or customs obligations and with collection orders issued by the relevant Authorities.

Recipients are prohibited from handling (e.g. importing, unloading, storing, exporting, or holding) goods subject to border duty when entering European Union territory or customs territory under suspension of duty and from evading the customs requirements and/or border duties due.

Money-related compliance and ethics

It is prohibited to counterfeit or enter into circulation (by buying and/or selling) banknotes, coins, public credit cards, revenue stamps, and watermarked paper. It is prohibited to replace or transfer money, goods, or other benefits deriving from crime, or to conduct other transactions in relation to the same in order to hinder the identification of their criminal origin.

It is prohibited to use the aforementioned goods or money in economic or financial activities.



Purchasing

In carrying out its activities, IIT undertakes to purchase products and services by following the rules of the Public Contracts Code and by strictly complying with internal rules governing purchasing processes. When selecting suppliers of products or services, IIT will conduct appropriate market assessments to identify potential suppliers and avoid situations involving any kind of favoritism or conflict of interest..

Information Security

Recipients must strictly comply with the Foundation's procedures and policies on information security and must use the Institute's resources – such as personal computers, telephone equipment, and other communication tools – in accordance with those procedures and policies, avoiding any behavior that could compromise the functionality and protection of the ICT system.

It is prohibited to unlawfully access a computer or telecommunications system protected by security measures.

It is prohibited to unlawfully obtain, for oneself or for third parties, codes, passwords, or other means of accessing a computer or telecommunications system protected by security measures.

It is prohibited to unlawfully obtain, for oneself or for third parties, computer equipment, devices, or programs in order to damage or disrupt a computer or telecommunications system of a third party.

More generally, it is prohibited to damage or disrupt the operation of a computer or telecommunications system of a third party.

It is prohibited to unlawfully intercept, hinder, or interrupt computer or telematic communications or to install equipment suitable for that purpose.

It is prohibited to destroy, damage, delete, alter, or suppress the information, data, or computer programs of third parties.

It is prohibited to issue qualified certificates in violation of the provisions of the law for those who provide electronic signature certification services.

Copyright protection

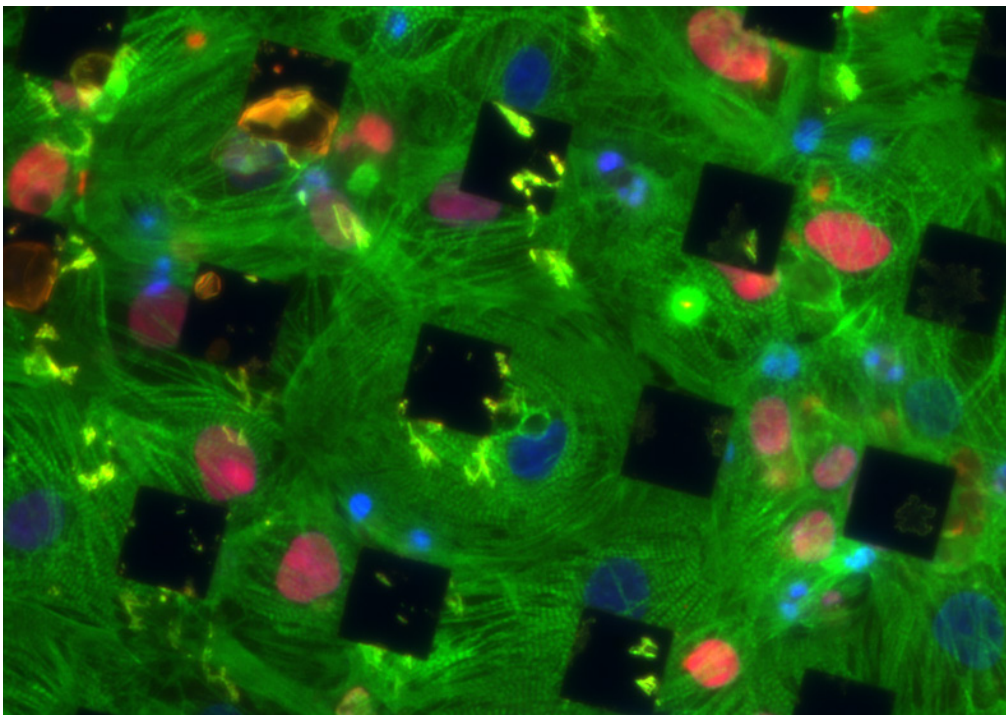
The Foundation fully respects the legitimate industrial and intellectual property rights of third parties, and the laws, regulations, and conventions protecting these rights, including at the EU and/or international level.

It is therefore prohibited to disseminate, without authorization, a protected intellectual work or part thereof to the public via telecommunication networks or connections of any kind

It is prohibited, when done for profit, to reproduce media without SIAE stickers or to transfer to another medium, distribute, communicate, present, or show in public the contents of a database in violation of the author's exclusive performance and authorization rights. It is also prohibited to extract, reuse, distribute, sell, or rent a database in violation of the rights of the creator or user.

It is prohibited to duplicate, reproduce, transmit, or disseminate to the public, without authorization, an original work intended for the television, film, sales, or rental market. It is also prohibited to duplicate, reproduce, transmit, or disseminate to the public, without authorization, records, tapes, similar media, or any other media containing phonograms or videograms of similar musical, cinematographic, or audiovisual works or sequences of moving images.

It is also prohibited to reproduce, transmit or disseminate to the public, without authorization, literary, dramatic, scientific, educational, musical, or dramatic-musical works, including multimedia works, or parts thereof, even if included in collective or composite works or databases.



It is prohibited for any reason to sell, distribute, market, transfer, project, transmit, or play in public the works referred to in the preceding points.

It is prohibited to engage in the activities referred to above when they involve any audio or video medium without a SIAE sticker or with a counterfeit or altered SIAE sticker, in cases where it is legally required to affix a SIAE sticker to the medium.

In the absence of an agreement with the distributor, it is prohibited to transmit or disseminate, by any means, an encrypted service received via an apparatus or parts of an apparatus suitable for decoding conditional access transmissions.

When producing or importing media not subject to the sticker referred to in Article 181 of the copyright law, it is mandatory to report to the SIAE, within the terms established by law, the data necessary to unambiguously identify this media.

Internal controls

To ensure compliance with the law and all internal procedures, the Foundation internally organizes work such that:

- i. responsibilities are adequately segregated, so that the joint support of different organizational roles within the Foundation is required to implement each process;
- ii. all actions and transactions are adequately recorded, and it is possible to monitor the processes of decision-making, authorization, and execution;
- iii. each transaction is supported by adequate documentation to allow checks at any time on the characteristics and reasons for the transaction and to identify the people who authorized, conducted, recorded, and verified the transaction;
- iv. all internal documentation is maintained in an accurate, complete, and timely manner in accordance with procedures.

Anti-corruption

IIT undertakes to implement all measures necessary to prevent corruption, according to the prescriptions and actions provided for by Law 190/2012, as implemented by the Foundation in the addendum to Model 231 relating to controlling corruption, to which full reference should be made.

Based on the provisions of the A.N.AC., which states that appropriate measures to prevent corruption and illegality must be *"brought together in a unified document that serves as a Corruption Prevention Plan, including to assess the annual update and supervision of the A.N.AC" and that "if combined in a single document with those measures adopted to implement Legislative Decree 231/2001, these measures shall be placed in a special section so they are clearly identifiable, given the different kinds of management and responsibilities for which they are relevant,"* the Foundation has decided to bring together the specific issues of anti-corruption and transparency in a special addendum to Model 231. The Recipients of this Code are required to comply with the rules to prevent wrongdoing and the spread of corruption within the Institute.



Recipients are prohibited from exploiting or boasting of relationships with a Public Official or a Person in Charge of a Public Service by having, for this purpose, given or promised, for themselves or others, money or other benefits as the price of mediation or to remunerate the same Public Official or Person in Charge of a Public Service. Likewise, it is prohibited to give or promise money or other benefits for this purpose.

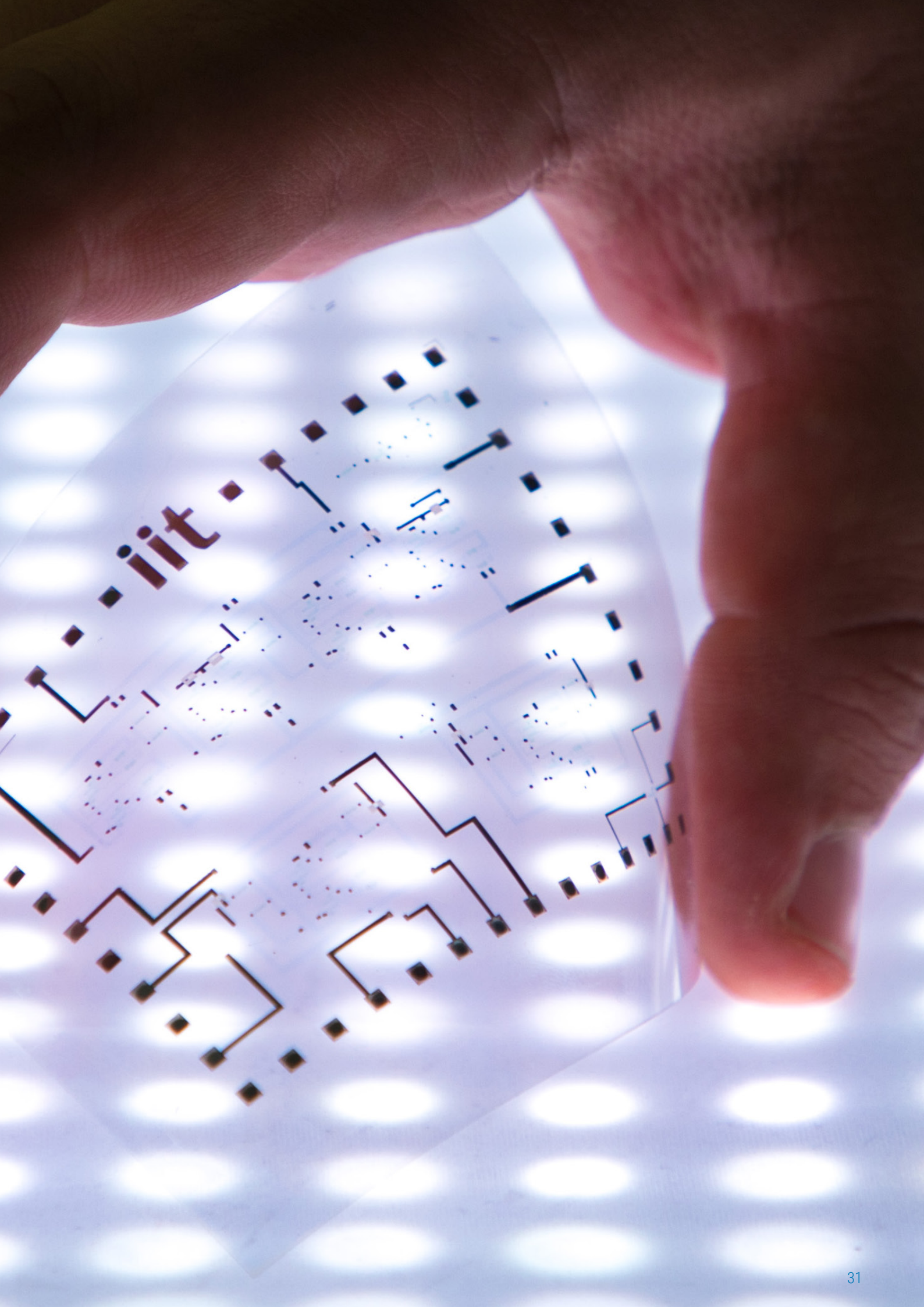
Each Recipient must cooperate with the person in charge of preventing corruption, as identified by the Foundation, providing them with any data or information requested and reporting, as set out in Section IV of this Code, if the Recipient becomes aware of any suspected situations of unlawfulness within in the Foundation.

Transparency is the key to preventing corruption and reducing the risk of a descent into criminality.

The Recipients of this Code must fulfil the Foundation's transparency obligations, in accordance with the current regulations, by cooperating with the processing, retrieval, and transmission of data for its mandatory publication on the website and via other required publication channels. Where required, Recipients shall use the ICT tools provided by the Foundation, following the archival methods set out in the procedures in order to ensure that information can be shared and traced.

How to proceed

- ✓ disclose any conflicts of interest, including potential conflicts, and refrain from engaging in conduct that conflicts with IIT's activity,
- ✓ do not accept gifts or gratuities if these are intended to influence decisions or obtain an unfair advantage,
- ✓ promote a culture of transparency,
- ✓ maintain the confidentiality of information,
- ✓ report any behavior that creates a risk of corruption,
- ✓ promote fair competition,
- ✓ purchase products or services in accordance with the rules of the Public Procurement Code,
- ✓ report any conduct that contravenes this Code, as set out in Section IV.



C. Relations between employees, collaborators, and consultants

Relations between employees, collaborators, and consultants of the Foundation, including students, doctoral students, affiliated researchers, trainees, fellows, and similar figures, must always be based on the principles of collegiality and must be conducted with mutual respect for each person's rights and freedom, avoiding any kind of behavior that could be construed as "harassment".

"Harassment" means the act of intentionally offending, humiliating, or discriminating against other people.

There is no exclusive or exhaustive description of all the actions that can be taken for this purpose. Single actions or a combination thereof may be taken, including but not limited to:

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

Relations between colleagues with different levels of responsibility or hierarchical positions must be conducted with integrity and fairness, in compliance with the provisions of the section "Use of confidential information".

All Managers of the various offices must act with objectivity and a careful balance when exercising the powers arising from their mandates and briefs, respecting the dignity of each individual and their collaborators, and promoting their professional growth via appropriate tools and training plans.

In turn, all members of the various offices must cooperate fully with their managers and supervisors, including to facilitate a correct and fair evaluation of their work.

Equal opportunities, diversity, and inclusion

The Foundation believes that equal opportunity and inclusiveness are fundamental principles and the key to creating fair, transparent, and prejudice-free relationships. IIT promotes human relationships based on respect and cooperation.

IIT is therefore committed to identifying and valuing diversity in order to foster understanding, inclusion, and appreciation of differences between people. Diversity enriches and opens up new ideas, multiplying the possibilities of generating innovative solutions: people from different cultures and social and generational backgrounds, and with different skills, expertise, and experiences represent a distinctive value that fosters research and innovation.

IIT does not tolerate any kind of discrimination based on gender identity, sexual orientation, ethnic origin, religion, nationality, skin color, marital status, pregnancy and parenting, family and care responsibilities, age, disabilities (sensory, cognitive, motor), social position, personal beliefs, including those related to politics, trade unions, or other associations, or any other group status.

The Foundation values gender balance and the defeat of stereotypes, discrimination, and prejudice. In this regard, the Foundation has drafted and published the Gender Equality Plan (GEP), to which we refer Recipients for further information on how the issue is handled.

IIT recognizes that all its people should have equal opportunities, regardless of sensory, cognitive, or motor disabilities. The Foundation is therefore committed to implementing concrete measures to promote the integration and inclusion of people with disabilities, making full use of their talents and skills and thus helping to remove cultural, sensory, and physical barriers.

IIT is also committed to fostering the integration of different cultures and experiences by promoting an intercultural vision that is open to discussion in order to bring together people from different cultures to support innovation and research.

IIT monitors Diversity and Inclusion via annually chosen indicators and promotes the use of a whistleblowing platform to report acts of discrimination, violence, and harassment.



Combating harassment, sexual harassment, and bullying

IIT prohibits any form of harassment³ based on sex, ethnicity, national origin, religion or ideology, sexual orientation, gender identity or expression (including self-image, appearance, and behavior) or gender reassignment, age, disability, marital status, cohabitation or civil union status, status as a foreigner or citizen, genetic predisposition or genetic disease carrier status, pregnancy and parenting status, medical conditions including those related to pregnancy or childbirth, status as a victim of domestic violence, sexual offenses, or stalking, and unemployment status.

IIT also explicitly prohibits any kind of sexual or romantic behavior that influences employment, remuneration, or career opportunities⁴.

IIT condemns any form of bullying, i.e. repeated verbal violence, verbal or physical conduct of a threatening, intimidating, or humiliating nature, or the sabotage or damage of a person's performance at work. Bullying damages both personal and professional dignity and creates a hostile work environment.

³ "Harassment" is repeated or isolated verbal, nonverbal, psychological, or physical conduct that is unwelcome, unacceptable, inappropriate, or unwanted, and that has the purpose or effect of interfering with work performance, lifestyle, or dignity, or causing a general state of annoyance, discomfort, and/or fear or anxiety in the individual, including for his or her own safety or the safety of his or her relatives, and that influences decisions regarding employment and professional development, or is otherwise likely to create an intimidating, hostile, degrading, humiliating, or offensive work and research environment, regardless of the identity of the person being harassed.

⁴ "Sexual harassment" is unwelcome conduct with a sexual connotation that is directed at an individual because of their sex, gender (including status of pregnancy, childbirth, or related medical conditions), gender identity or expression, or sexual orientation, or that offends the individual's dignity, where accepting or rejecting this unwelcome conduct is implicitly or explicitly a work-related term or condition that affects the individual, or where this conduct has the purpose or effect of unjustifiably interfering with work performance or creating an intimidating, hostile, or offensive work environment.

Recipients are therefore required to treat colleagues and third parties with respect and to take suitable measures to ensure a work environment free from any kind of harassment.

IIT takes suitable measures to suppress and prevent any act of harassment, sexual harassment, or bullying involving third parties.

Finally, IIT believes that training is essential to fostering awareness and prevention. IIT is therefore committed to providing training to combat harassment, sexual harassment, and bullying.

Duty of loyalty

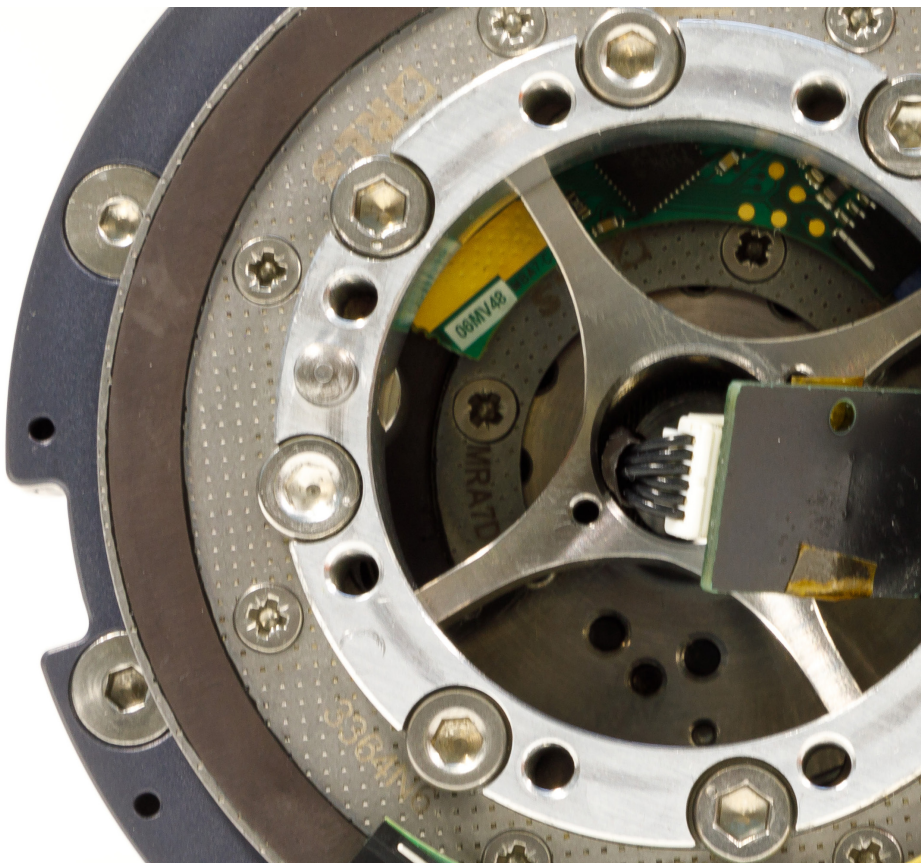
The duty of loyalty summarizes the above-mentioned duties and means that each employee is:

- prohibited from accepting jobs that are in competition with the Foundation and from disclosing information about its organization;
- prohibited from conducting tasks that conflict with the Foundation's interests and from violating the duty of loyalty pursuant to Article 2105 of the Civil Code.

In general, Recipients are obliged to diligently perform their professional services, operating in the Foundation's interests and aiming for effectiveness and efficiency, but also with the full awareness that ethics is one of the Institute's key interests, such that we will not tolerate behavior that is in conflict with current regulations or this Code, even if it appears to benefit the Foundation in the abstract.

Occupational health and safety

IIT has always been committed to promoting, disseminating, and consolidating a safety culture, taking Legislative Decree 81/2008 as its main reference, developing risk awareness and an attitude of responsible behavior among all employees. In terms of prevention, the Foundation works to maintain the health and safety of its people.



IIT will accept no compromises in the area of occupational health and safety.

Recipients shall not subject other Recipients to unnecessary risks that may compromise their health or physical safety.

All those who work for the Foundation are responsible for good management and compliance with the principles established to protect health, safety, and the environment.

Within the limits of the current regulations, IIT is committed to maintaining a safety-conscious work environment and, depending on the task, to providing its employees, collaborators, and consultants with all the equipment necessary to appropriately protect them from any risk or danger to their integrity.

To this end, IIT is required to inform all employees and contractors about the legal conditions and the Foundation's health and safety practices and procedures. IIT is committed to maintaining its offices and operating systems in such a way as to comply with all safety standards.

Within the scope of the rules about performing their duties, employees and collaborators are obliged to comply with the legal conditions and with the Foundation's practices and procedures.

Finally, IIT conducts periodic audits to ensure that all security measures are effectively implemented and respected, and acts promptly if corrective action is needed.

Employees and contractors are obliged to report any unsafe action or conditions to the designated manager.

It is strictly prohibited to retaliate against employees or contractors who in good faith raise concerns about health and safety.

Internal and external communication at IIT

Both internal and external communication at the Foundation must be clear, precise, and truthful in order to avoid disseminating erroneous news and information or creating situations with any kind of potential liability for the Institute.

Communicating information to the public must be handled by the formally designated offices.

Conscious use of social media

IIT is aware that inappropriate use of social media can lead to unethical attitudes or even to a crime.

People at the Foundation are therefore obliged to avoid conduct and situations that could damage their own or the Foundation's reputation and, when using social media, they must follow the rules set out in the Policy on using social media.

Conscious use of e-mail

Incorrect or improper use of e-mail can have negative consequences for the user or for others.

People at the Foundation are therefore obliged to avoid using e-mail inappropriately (e.g. chain e-mails, using a group of e-mail addresses to respond to a single recipient, sending large unsolicited attachments) and to observe the rules governing the confidentiality of information.

Possession of pornographic material

The Foundation prohibits people from possessing, on its premises, warehouses, outbuildings, or any other place that is otherwise traceable to the Foundation, pornographic material or virtual images made using images of minors. "Virtual images" are images that are made using graphic-processing techniques, that either in whole or in part are not associated with real situations, and that have a quality of representation that makes non-real situations appear to be real.

Illegal immigration

In compliance with the relevant regulatory provisions, the Foundation shall not establish any employment relationship with persons without a residence permit, nor shall it conduct business relationships with persons (natural or legal) who are known or suspected to be conducting illegal activities as specified in and criminally sanctionable by the "Consolidated text of provisions governing immigration and the status of foreigners" and by immigration regulations in general.

In general, the Foundation undertakes not to carry out any activity likely to facilitate the illegal entry of immigrants into Italy.

How to proceed

- ✓ promote and value diversity,
- ✓ be inclusive,
- ✓ respect the rules relating to gender,
- ✓ promote and ensure the health and safety of workers,
- ✓ ensure the proper and safe use of the computer systems provided,
- ✓ use social media ethically and consciously,
- ✓ contribute to a proper internal work organization,
- ✓ comply with the Policy on using social media,
- ✓ report any conduct that contravenes this Code, as set out in Section IV.

Social Media Guidelines



VPN

D. Relations with suppliers

When purchasing goods, services, and works on behalf of the Institute, the Recipients undertake to act with reasonable care and due diligence, in compliance with their delegated powers and proxies and following the principles of fairness, cost-effectiveness, quality, and lawfulness. The Institute's suppliers must be selected according to the principles of legality, fairness, and transparency, and based on objective and impartial criteria in terms of quality, level of innovation, and cost, so that all suppliers enjoy impartiality and equal opportunities for collaboration.

When fulfilling contracts with third parties, particularly with those belonging to the Public Administration (that is, entities providing an essential public service), the Recipients are obliged to fulfil their contractual obligations, always acting with due diligence and in good faith.

E. Relations with organizations, institutions, research centers, and universities

Given its role in fostering scientific research and technological development, IIT considers it essential to cooperate with bodies, international public institutions, national public institutions, national agencies, research centers, universities, businesses, and private organizations.

One of IIT's primary goals is to transfer the results of its technology research to industry. The Institute therefore promotes commercial agreements and collaborations with the aforementioned external entities or institutions. The aims of these commercial agreements and collaborations must fulfil various criteria, as assessed collegially by the Research Line, the Technology Transfer Directorate, and the Scientific Directorate of the Foundation.

In addition, IIT collaborates with leading Italian universities, offering graduate students the opportunity to pursue doctoral degrees and providing access to its laboratories and research facilities.

Finally, with regard to competitive fundraising projects involving public, private, national, and international funding agencies or institutions, IIT is committed to ensuring that the benefits derived from the results of scientific research and the related costs are fairly shared between IIT and its counterparts. All Recipients involved in fundraising operations are required to prioritize IIT's interests over any other situation that may involve a personal benefit, real or potential, for themselves, their family members, or any of their associates, and to follow the appropriate procedure if even the appearance of a conflict of interest arises that involves these individuals.

The Foundation's commercial and collaborative relationships must be inspired by the values set out in this Code.

F. Relations with the public administration

In addition to refraining from any kind of active or passive corruption or collusive behavior, Recipients must comply with the following principles and rules of conduct in their relations with the Public Administration:

- Entering into any kind of commitment and managing any kind of relationship with the Public Administration, defined in the broadest sense, is reserved exclusively for the offices appointed for this purpose and for authorized personnel, in strict compliance with the Foundation's internal procedures and the delegated mandates and proxies. The same provisions apply to relationships with guarantor and supervisory authorities.
- In relationships with the Public Administration and with guarantor and supervisory authorities, those involved are required to maintain the utmost transparency, clarity, and fairness in order to establish a relationship of the utmost professionalism and cooperation.
- Recipients, especially if they become involved in legal proceedings, must refrain from conduct that is reticent, omissive, or may, even indirectly and/or involuntarily, obstruct the work of justice agencies. Similarly, Recipients must refrain from any pressure, threat, including the use of physical violence, or offer of money or other benefits in order to induce a person to make no statements or false statements to a Judicial Authority.
- The Foundation requires Recipients to offer the utmost helpfulness and cooperation to anyone who comes to conduct inspections and audits on behalf of INPS, ASL, the Ministry of Labor and Social Policies, the Ministry of Economy and Finance, and any other Public Administration.
- It is prohibited to destroy or alter records, minutes, accounting entries, and any kind of document, or to lie or make false statements to the relevant Authorities.

No one shall attempt to persuade others to provide false or misleading information to the relevant Authorities.

G. Relations with Governance Bodies

Appointments of members of governance bodies (i.e. the Board, the Executive Committee, including the internal advisory committees, that is, the Appointments Remuneration and Governance Committee, the Strategic Committee, the President, the Scientific Director, the Scientific Technical Committee) must be made by following transparent procedures.

The governance bodies shall act and deliberate autonomously and in view of the facts, aiming to create value for the Foundation in accordance with the principles of legality and fairness.

Decisions by members of the governance bodies must be autonomous, that is, based on unbiased assessments and aiming to serve the Foundation's interests.

Governance bodies are required to exercise independence of judgment when making decisions, which means that members must ensure the utmost transparency in managing transactions in which they have special interests.

H. Environment and protection of animal species

The Foundation is particularly focused on environmental issues and is committed to adopting strategies and techniques that improve the environmental impact of its activities, in compliance with current regulations and taking into account developments in scientific research and best practices.

To reduce environmental risks, the Foundation shall operate in line with the following principles:

- i. a focus on environmental issues shall be progressively integrated into Foundation activities;
- ii. all necessary measures shall be taken to comply with and adapt to the current regulations governing environmental protection;
- iii. staff shall be constantly updated on legislative and regulatory developments concerning the environment;
- iv. staff shall be made aware of and involved in environmental issues.

The Institute manages activities around experimentation on animal species in full compliance with current regulations. In addition, the Foundation promotes and encourages the protection of animal species and strictly condemns the killing, destruction, capture, removal, and keeping of specimens of animal species that are protected or that constitute a danger to public health and/or safety.

I. Protection of cultural and landscape heritage

The Foundation shall refrain from activities that may violate the rules established to protect heritage of cultural or landscape relevance and/or interest.

If the Foundation's activities impact an environment subject to restrictions due to landscape, cultural, or artistic merit, then these activities must be conducted in full compliance with the relevant technical standards (Cultural heritage and landscape code).

How to proceed

- ✓ choose suppliers according to the principles of legality, fairness, and transparency, and based on objective and impartial criteria,
- ✓ incorporate the ethical principles of this Code into business relationships with organizations, institutions, research centers, and universities,
- ✓ be transparent in relationships with the public administration,
- ✓ report any conduct that contravenes this Code, as set out in Section IV.

Section III
Guidelines
for Scientific
Conduct



With this Code, IIT also seeks to promote the principles of integrity and intellectual and scientific honesty, which all its personnel (employees, collaborators, doctoral students, affiliates, etc.) must follow when conducting scientific research, while also respecting the relevant national, EU, and international regulatory frameworks.

IIT's values are strongly linked to scientific research, which must be responsible and honest in all its phases, including research design, development, collaboration, and dissemination of results. When conducting scientific research, Recipients are therefore required to:

- know and comply with all the relevant codes, standards, policies, and internal procedures, and treat research subjects (human, animal, biological) with care and respect according to legal and ethical requirements;
- use appropriate research methods with a view to state-of-the-art knowledge, draw conclusions based on a critical analysis of the data, and report the findings and interpretations fully and objectively;
- design, conduct, analyze, and document research in a rigorous and reasoned manner;
- make good and conscientious use of research funds;
- share research data and conclusions in a transparent, open, and timely manner, while respecting the confidentiality of data or research findings when legitimately required;
- acknowledge in publications the names and roles of those who have significantly contributed to the research;
- declare any conflict of interest, financial or otherwise, that could compromise the credibility and reputation of the research in project proposals, publications, public communication, and review activities;
- avoid engaging in scientific misconduct, i.e. violating the integrity of scientific research in a way that compromises relationships between researchers, undermines trust in research and its credibility, or wastes resources, thus potentially exposing the Foundation and its people to avoidable harm.

Finally, in conducting and promoting research activities, the Foundation acknowledges and implements the principles set out in the *"Commission Recommendation of 11 March 2005 concerning the European Charter for researchers and a Code of conduct for the recruitment of researchers"*, which contains two sections, namely, the *"European Charter for researchers"* and the *"Code of conduct for the recruitment of researchers"*.

Specifically, the *"European Charter for researchers"* is a set of general principles and requirements that specify the role, responsibilities, and rights of researchers and the people who hire and/or fund them. This charter's purpose is to ensure that the nature of the relationship between researchers and employers fosters positive outcomes in the production, transfer, sharing, and dissemination of knowledge and technological developments, and is conducive to the professional development of researchers.

In contrast, the *"Code of Conduct for the recruitment of researchers"* is an integral part of the *"European Charter for researchers"* and is a set of general principles and requirements to be followed by employers and/or funders when appointing or hiring researchers. These principles and requirements should ensure the fulfilment of criteria such as transparency in the recruitment process and the equal treatment of candidates.

Scientific misconduct

As noted above, Recipients are prohibited from engaging in scientific misconduct.

“Scientific misconduct” means improper behavior such as fabrication, falsification, or plagiarism when proposing, conducting, or reviewing a research activity. In detail:

- a) *Fabrication* means making up data or research results.
- b) *Falsification* means manipulating research materials, equipment, or processes, or changing or omitting data or results, such that the research is not represented accurately.
- c) *Plagiarism* means appropriating another person’s ideas, processes, results or words without giving them credit. Plagiarism may be caused by a lack of understanding of what plagiarism is, a propensity for manipulating text, tight schedules, an overly high workload, poor supervision of trainees, or an underestimation of plagiarism’s severity. If plagiarism is found to have taken place, the responsible individuals may be subject to censure, withdrawal of scientific articles or funding, or termination of employment with the Foundation. A failure to adequately supervise one’s direct or organizational supervisees may lead to the supervisor themselves being placed under observation or suspended from supervision, with a consequent review of the responsibilities within the working group.

The above forms of misconduct are extremely serious because they distort research results.

Misconduct may involve other violations of good research practices, thus damaging the integrity of both the research process and the researcher. The failure to follow good research practices is a breach of professional responsibility. This includes violating an author’s moral rights, manipulating authorship rights in publications, denigrating the roles of other researchers in publications, republishing substantial portions of one’s previous publications (including translations) without properly acknowledging or citing the original (i.e. self-plagiarism).

In addition, scientific misconduct may include the failure to disclose in scientific communications any conflicts between the publication contents, the actual research result and value, the researcher’s professional interests, and the research funder’s economic interests, in situations where such a disclosure is explicitly requested (e.g. by scientific journals, funding agencies, scientific societies organizing conferences).

Scientific misconduct does not include errors made in good faith or mere differences of opinion.

Moral rights of intellectual authorship

Intellectual authorship is an explicit way of assigning ownership of and credit for intellectual works.

Conducting a scientific experiment or any other research project comprises many elements (formulating a hypothesis, developing or applying methodologies, collecting data, analyzing results, and publicly reporting the work).

Since all these elements require both technical skills and an intellectual contribution, they are recognized via the concept of intellectual authorship. However, intellectual authorship does not imply ownership of the rights to exploit and use the respective idea, methodology, research materials, or data.

Intellectually contributing to and practically implementing an idea are both equally important to the research process. IIT always owns the rights of exploitation and use. IIT works to correctly attribute intellectual property rights in order to increase the prestige of those who contribute to the Institute’s research activities.

The correct attribution of intellectual property rights, moral and ownership, to authors and inventors is enshrined in national and international laws. It enhances the reputation of both the Institute and the researcher who, along with legal obligations, obtains a fair reputation and remuneration for contributing to scientific publications as author or co-author or to industrial patents as inventor or co-inventor. Where possible, the names and order of the author list in a publication shall be agreed upon when planning or in the early stages of developing the research. Without prejudice to the provisions of copyright and other rights related to its exercise, the legitimate authors of a scientific publication are all those and only those who have significantly contributed to the work itself.



A “significant contribution” and thus intellectual authorship of a scientific publication presupposes that a researcher has participated in at least one of the following activities:

- i. formulating the research hypothesis;
- ii. designing the research and methodology;
- iii. collecting the data;
- iv. processing and analyzing the data;
- v. interpreting the results;
- vi. drafting significant portions of the text.

A researcher on the author list must have been involved in the process, including the final stage of approving and publishing the work. Within the scope of their expertise, they must ensure the accuracy and integrity of the publication contents. If a researcher has merely helped to secure funding or generally supervised the research group without contributing to the substance of the published work (gift authorship), then this does not qualify as intellectual authorship.

Other minor contributions that do not qualify as intellectual authorship may include providing existing data, proofreading the paper, administrative support, and so on. However, these kinds of contributions may be included in the acknowledgments section of the publication. It is a form of plagiarism to deliberately ignore or fail to acknowledge an author’s contributions.

IIT affiliation

When submitting or publishing a scientific paper, the following authors must indicate an affiliation with the Institute:

1. researchers who were members of the Institute's scientific staff when they conducted one or more of activities 1-6 listed above;
2. researchers from other organizations/institutes with formal collaborations with IIT that explicitly outline the right to indicate affiliation with IIT in publications; the collaboration must have been active when they performed one or more of activities 1-6 listed above;
3. people who were affiliated with IIT when they performed one or more of activities 1-6 listed above; this includes doctoral students whose fellowship is funded by IIT.

The affiliation must be indicated in full and in Italian: "Istituto Italiano di Tecnologia." This may be followed or preceded by details about the research line (line name, acronym, etc.), if deemed necessary by the authors. In cases 2 and 3 above, additional affiliations with other bodies/institutes may be indicated.

Collegiality in research

The principle of collegiality must inform all research activity at IIT to ensure that:

1. research groups in the early stages of project development discuss and oversee the suitability of the data management, the research value, the publication, the disposal of the data and research materials, and the future research directions;
2. the research group objectives are clear and shared with all group members;
3. the most appropriate mechanism for resolving internal disputes, supported by the research group's Principal Investigator, is already established;
4. the decisions in item 1, the objectives in item 2, and the methods in item 3 are reviewed periodically, since both the area of scientific investigation and the individual division of labor are subject to change.

Management of data and databases

All data and research materials, including unpublished data, must be handled appropriately.

Access to data must be FAIR (Findable, Accessible, Interoperable, and Reusable).

If a researcher or anyone else involved in the research leaves the research lab, the master data (including metadata and related documentation) remains the Foundation's property and must remain within the Foundation. It is the Principal Investigator's responsibility to ensure this happens.

Copies of laboratory notebooks, electronic media, source codes, and other research documentation may be made available or disposed of with the authorization of the individual responsible for the research activity, but the original data must be retained.

In conducting their duties, Recipients must follow the data management rules, as implemented by the Foundation to comply with current regulations and set out in the internal guidelines on Open Access/Data Management.

"Abandonment" by a researcher

In the event that one or more participating researchers "abandons" a research project, then the integrity of the research must not be compromised.

The Foundation is committed to creating suitable collaboration arrangements that enable the departing principal investigator to provide ongoing intellectual input to the projects in which they have been involved.

This collaboration should be fostered by an open, synergistic, and non-competitive discussion between the departing researcher and their (former) supervisor/team at IIT.

In general, continuous collaboration should be encouraged for at least six months/one year after “abandonment”.



Research supervision

The Foundation shall ensure adequate training in the design, methodology, analysis, ethics, and integrity of research.

It is understood that each research group's Principal Investigator shall exercise due care and diligence to ensure a relationship of careful supervision of inexperienced group members, such as more junior investigators, students, and trainees, possibly by identifying mentors within the research group.

In addition, the Principal Investigator must ensure that the number of mentees assigned to each mentor is such that the mentor has the resources to follow and supervise their mentees with timely regular interactions, thus allowing for valid scientific exchanges and the supervision of the research in all its stages.

The Principal Investigator, supported from time to time by the mentor, shall supervise the processes of designing experiments and of acquiring, recording, verifying, interpreting, and storing data.

Promotion of start-ups and management of relationships with researchers and scientific staff

In the event that IIT researchers and scientific staff are involved in an entrepreneurial start-up promoted by the Foundation, then the Foundation shall conduct the necessary checks of employment law and conflicts of interest, in accordance with the provisions of the adopted procedures.

Control of dual-use products

For national security reasons, great caution is taken with dual-use products. Dual-use products are tangible and intangible goods (e.g. software, projects, technologies, chemical research) created and sold for civilian use, but that could have potential military applications. IIT pays attention to commercial requests (e.g. collaborations, research projects), especially from countries that represent a high security risk or are subject to sanctions/embargoes by the international community. Such cases must be reported to one's manager or to the Scientific Director, so that they can conduct the necessary controls and take preventive action.

How to proceed

- ✓ abide by the values and ethics on which IIT is founded,
- ✓ be fair and transparent in your research,
- ✓ do not engage in improper activities,
- ✓ store research data appropriately,
- ✓ report any conduct that contravenes this Code, as set out in Section IV.



Section IV

Supervision, reporting and disciplinary system

A. Procedure for reporting violations

General principles

Reporting unethical behavior is essential to helping prevent and manage ethical and moral issues. The Foundation encourages all forms of reporting and provides Recipients with all the means necessary to report any behavior that contravenes the Code's rules in the certainty that the report will be handled anonymously in order to protect the reporter. In particular, the reporter will be protected from any kind of harassment or discrimination that could potentially arise from making a report. No one will be subjected to any contractual change, or any other adverse measure, as a result of making a report.

Roles and responsibilities

The Supervisory Board (hereinafter "**SB**"), appointed pursuant to Legislative Decree No. 231/2001, monitors compliance with the oversight principles set forth in Model 231. The SB reports on its activities to the Executive Committee.

The Ombudsperson is appointed from among the leading academic-scientific figures with significant experience in research institute operations. The Ombudsperson is responsible for evaluating reports pertaining to cases of misconduct, as set out in Section III of this Code. The Ombudsperson reports on their activities to the Executive Committee.

The Ethics Committee is responsible for periodically evaluating whether the mandates of those who hold particular offices are compatible with other activities or duties. The Ethics Committee reports on its activities to the Board.

The Human Capital and Organization Directorate is responsible for preventing discrimination, harassment, and bullying. The Human Capital and Organization Directorate reports to the General Manager and Scientific Director/Employer within the scope of their respective responsibilities.

The Compliance Directorate is responsible for transparency, anti-corruption, and conflicts of interest (except where cases of conflicts of interest fall within the Ethics Committee's responsibilities). The Compliance Directorate reports on its activities to the Executive Committee.

The reporting process

If, during their work, Recipients become aware of behavior that potentially violates the principles set out in this Code, then they may submit reports via the communication channels set up by the Foundation for this purpose:

- email - organismodivigilanza@iit.it;
- post – Via Guidubaldo Del Monte n. 54, 00197 - Roma;
- whistleblowing platform (<https://iit.segnalazioni.net>),

The reports will be handed to the SB, which will conduct a preliminary assessment in order to identify and appoint a suitable investigator according to the responsibilities set out above. The SB may use the Foundation's internal functions to conduct this assessment.

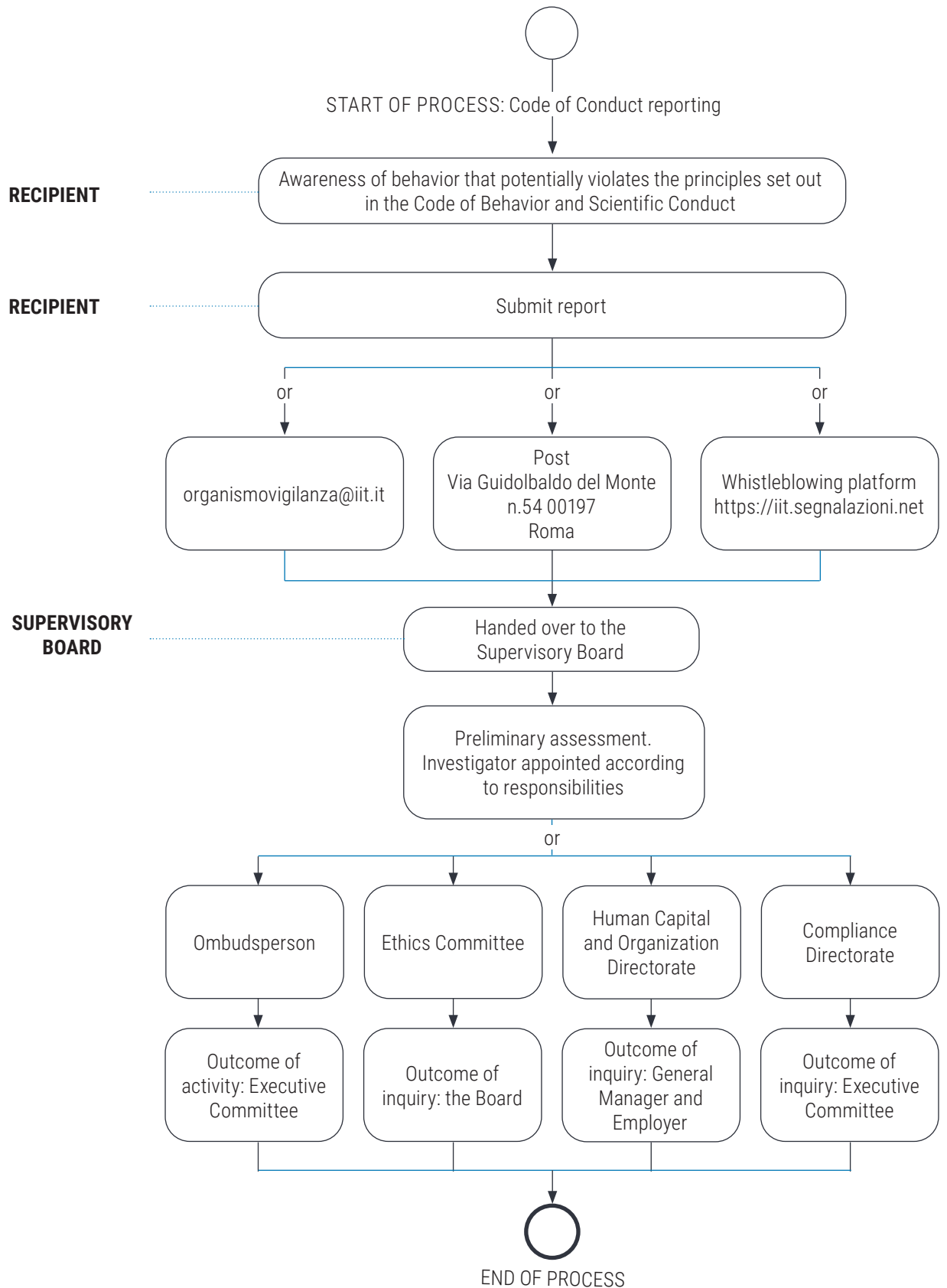
All persons involved in managing the reports are bound by confidentiality and will report on the results of their investigations in the manner described above.

Whistleblowing



VPN

Flow chart: Flow reporting violations

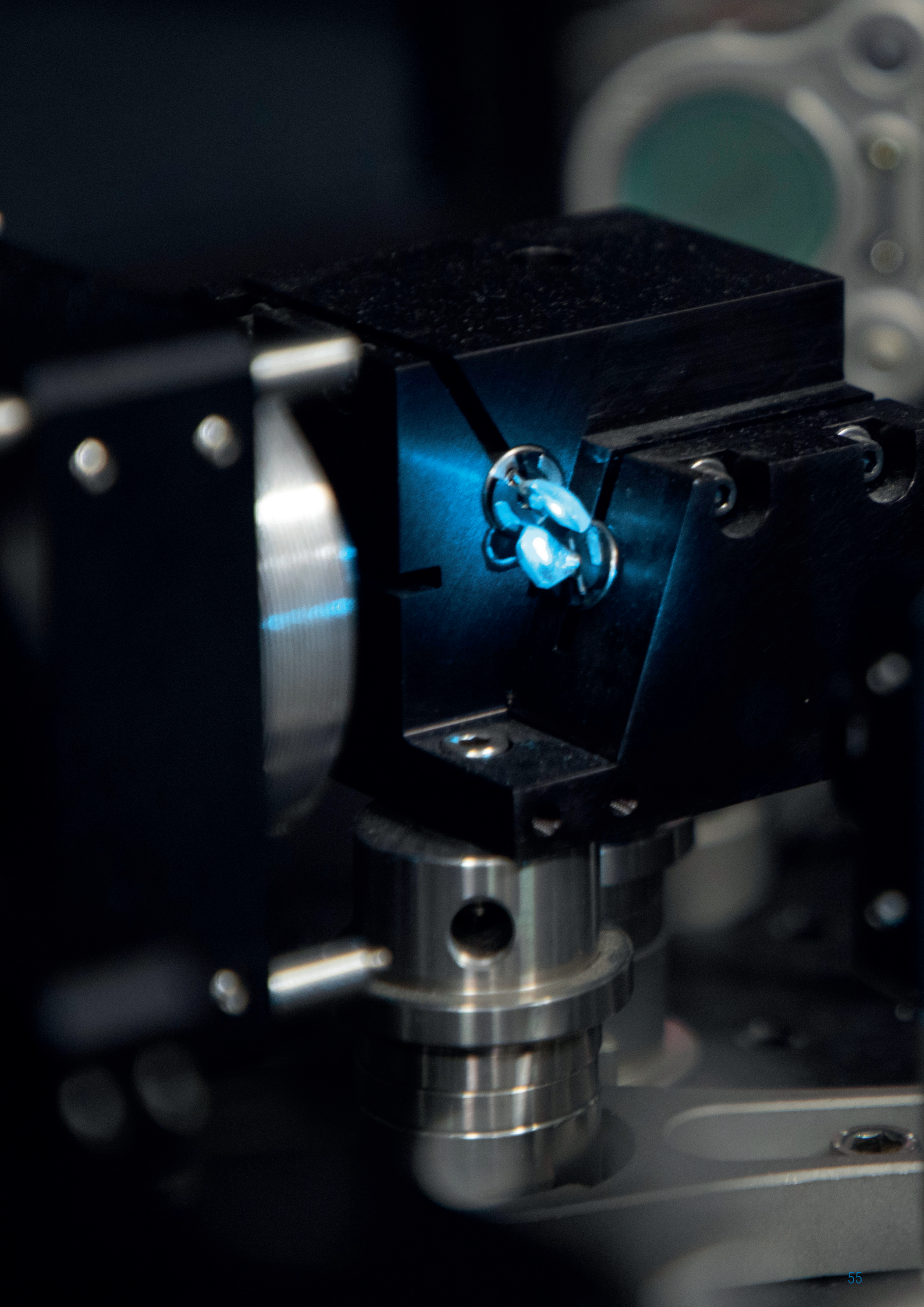


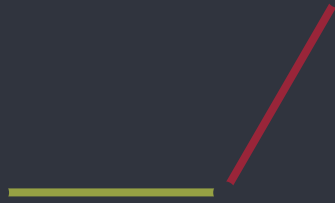
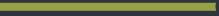
B. The disciplinary and sanctions system

Compliance with the Code is integral to the mandates and assignments of the governance bodies, collaborating consultants, and third parties, and to the obligations deriving from the employment relationship with employees pursuant to and in accordance with current regulations.

Therefore, the violation of or non-compliance with the principles and rules in this Code:

- by employees is a breach of the obligations deriving from the employment relationship and is a disciplinary offence, and will be managed via the relevant organizational structures in accordance with the provisions of the relevant contracts or assignments and the Foundation's disciplinary code;
- by members of the Governance Bodies may lead the Executive Committee to take the most appropriate legal measures. If an Executive Committee member commits a violation, then the other Committee members will determine the most appropriate sanction;
- by collaborators, doctoral students, consultants, or suppliers is sanctionable in accordance with the provisions of the relevant contracts and/or assignments.





ISTITUTO ITALIANO DI TECNOLOGIA
Sede Legale: Via Morego, 30 16163 Genova
Uffici di Roma: Via Guidubaldo del Monte, 54 00197 Roma
Tel. 010 2896
www.iit.it