
CODE OF ETHICS

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1. Foreword

The Psychoanalytic Institute for Social Research (Istituto Psicoanalitico per le Ricerche Sociali, IPRS E.T.S.) is a non-profit association, active in the field of psychological, social and bioethical sciences. It carries out research activities in various domains, with a special focus on social phenomena connected to deprived and marginalised adolescents, drug addiction, racism and xenophobia and other forms of discrimination; the study of aggregation mechanisms in the civil society, such as voluntary work and self-help activities; the analysis of educational processes; intercultural pedagogy - providing teachers with specific intervention tools through the development and implementation of training and refresher programmes; bioethics and biomedicine.

In carrying out its mission, the Institute has always taken respect for the law as its guiding principle, while promoting legality in every field and activity in a spirit of fairness, transparency, confidentiality and respect for the dignity of the person.

This Code of Ethics lays out the Institute's values, as well as its rights, duties and responsibilities vis à vis all the stakeholders it engages with, in view of pursuing its corporate purpose.

2. Purpose

The purpose of the I.P.R.S. E.T.S.'s Code of Ethics is to define and formalise the ethical values of the Institute, that are at the basis of its activity, as well as the standard behaviours required of anyone acting in the I.P.R.S. E.T.S.'s interest or to its advantage in the performance of its activities and business. The Code of Ethics provides for a mandatory conduct, and prohibits inappropriate behaviours; hence, it must be strictly referred to in case of activities, acts or transactions that are not governed by rules, regulations or procedures imposed by the law or specific regulations.

3. Beneficiaries

The principles of this Code of Ethics apply to the following:

- the members of the Association,
- all employees without distinction of role and function,
- all stakeholders who collaborate with the Institute in different capacities,
- suppliers, and in any case, our commercial partners.

The persons required to comply with the Code are hereinafter referred to as "Recipients."

All Recipients are obliged to have a thorough knowledge of this Code, the Organisation and Management Model adopted, as well as the relevant legislation. In addition, they must refer to the Supervisory Board to report any violations or to receive clarifications about the Code. All Recipients have a duty to cooperate with the Supervisory Board in order to help it perform its functions.

Compliance with the rules of the Code of Ethics is considered an essential part of the contractual obligations of the Institute's Employees and Collaborators, pursuant to Articles 2104 and ff. of the Italian Civil Code. Non-compliance with this Code is to be considered serious misconduct, and as such, it undermines the trust-based relationship that employees and collaborators have established with the Institute, without prejudice to the compliance with the procedures laid down in the Workers' Statute (Law 300/1970) and collective bargaining agreements.

4. Reporting violations and sanctions of the code of ethics and the model

All the Recipients of the Code of Ethics have the duty to report violations thereof to the Supervisory Board, in compliance with the procedures set forth in the Organisation Model.

The Supervisory Board analyses the reports received and gathers the information necessary to assess the validity of the report in cooperation of the managers or corporate bodies involved. At the end of the investigation, the competent corporate body adopts possible sanctions or corrective measures. The violations of the Code of Ethics result in sanctions proportionate to the severity of the offence, which may go as far as the worker's dismissal or the termination of the collaboration or supply contract, in addition to compensatory damages.

The Supervisory Board supervises the preliminary phase of investigation and the subsequent application of disciplinary measures, expressing views on the appropriateness of the sanctions adopted.

The Institute undertakes to protect the confidentiality of the persons who report violations. The report of violations constitutes not only an obligation for the Recipients, but also an important mechanism for the growth and improvement of the whole organisation. The protection of whistleblowers is a primary objective for the Institute, as it commits to preventing and sanctioning any discrimination or retaliation against those who report violations of the Model or this Code.

Reports must be detailed, and based on precise and concordant facts. The

Institute reserves the right to take appropriate measures against reports that prove deceitful, discriminatory or retaliatory.

The I.P.R.S. E.T.S. adopts sanctions against those responsible for violating the Whistleblowing policy, as well as those who present fabricated reports out of malice or gross negligence.

5. General ethical principles

5.1 Legality

The Recipients are required to comply with the laws, regulations, specific procedural guidelines, as well as all the principles, procedures and rules laid down in the Organisation and Management Model and the Code of Ethics.

In the event of doubts as to the conduct to be maintained, the Recipients must contact the Supervisory Board, which will provide all the relevant clarifications.

The I.P.R.S. E.T.S. keeps informed on changes to the specific legislation, in an effort to update and educate employees and all those working in its interest. To this end, it organises training activities aimed at instructing and sensitizing employees on issues related to the applicable regulations and the Code of Ethics.

5.2 Fairness

The Recipients are required to comply with the I.P.R.S. E.T.S.'s rules, as well as with the ethical, expert and professional rules applicable to the activities that they carry out in the interest or to the advantage of the Institute.

In every internal and external relationship, the Recipients must behave according to the principles of transparency, integrity and honesty and must not pursue their personal interests and/or the interests of the Institute behaving in violation of the law, the Organisation and Management Model or this Code of Ethics.

The I.P.R.S. E.T.S. considers fair competition as a value and operates on the market, in compliance with the principles of fairness and correctness.

5.3 Trust and Knowledge Dissemination

The I.P.R.S. E.T.S. considers mutual trust as a tenet of its relationships with

all its business partners and employees.

The Institute commits to disseminating information, knowledge, experiences and professional skills, so that each individual's cultural background can enrich the Institute as a whole.

To this end, the I.P.R.S. E.T.S. promotes teamwork and collaboration at different levels, with a view to enhancing synergy among all those who work within it. Moreover, in its effort to foster the skills of its employees, the I.P.R.S. E.T.S. provides them with continuing education and training tools.

5.4 Transparency

The I.P.R.S. E.T.S. undertakes to provide clear and truthful information to its interlocutors, whether internal or external. In particular, it presents the economic/financial results achieved and the objectives to be pursued in all clarity, precision and accuracy. All reports are inspired by the principles of transparency, clarity, completeness and relevance of the information disclosed.

5.5 Confidentiality

The acquisition, processing and storage of information and personal data is carried out in compliance with the Italian and European legislation (Legislative Decree no. 196/2003 and Regulation no. 679/16), as well as the procedures adopted and aimed at preventing unlawful processing and unauthorised data disclosure. The I.P.R.S. E.T.S. restricts access to personal data only to those Recipients who are duly authorised to process it for professional reasons. All the Recipients who have access to the data are bound by obligations of confidentiality and non-disclosure. The data may only be processed for the purposes for which it was collected or for the additional purposes authorised by the Controller.

Through the adoption of adequate procedures, the I.P.R.S. E.T.S. undertakes to prevent unlawful data processing, as well as computer crimes and the illegal acquisition or processing of personal data.

5.6 Impartiality

The I.P.R.S. E.T.S. rejects any discriminatory conduct, based on race, sex or religion, ethnicity, language and nationality. The I.P.R.S. E.T.S. guarantees its employees respect for the principle of equal opportunities and fair treatment. In

their turn, the Employees undertake to provide professional services, aimed at excellence and to always operate according to the principles of efficiency and effectiveness.

5.7 Respect for the individual

The I.P.R.S. E.T.S. holds the protection of the person as a fundamental value of its work and always acts respecting health and human dignity. The Recipients of this Code act according to the principle of impartiality, avoiding any form of discrimination, in particular on grounds of religion, gender, age, sexual orientation, and racial or ethnic origin.

In all their business activities, the Recipients must respect Human Rights, in particular committing to the protection of the right to life and freedom, equality, and freedom of expression; as well as the protection of the right to work, fair wages and to working conditions that ensure workers' health.

5.8 Scientific research

The I.P.R.S. E.T.S.'s aim is to deepen its understanding of the problems posed by contemporary society, with a particular focus on the study of social phenomena related to deviance, distress and marginality.

For this reason, it considers culture and knowledge as the primary legacy of post-modernity.

6. Third-party relationships

6.1 Foreword

Under no circumstances in the contacts that the I.P.R.S. E.T.S. intends to have, may the Institute have business relationships with persons connected to criminal organisations and/or involved in illegal activities (trafficking in arms and drugs, receiving stolen goods, money laundering, use of ill-gotten gains, goods or benefits) or with persons who in any way violate the fundamental human rights.

All Recipients are prohibited from entering into agreements or business relationships with natural or legal persons who use distinctive or counterfeited trademarks, patents, designs belonging to others, thus denying third-party rights.

The I.P.R.S. E.T.S. shall immediately terminate any business, work or professional relationship with anyone who is finally convicted of the offences listed under Article 416 and Article 416 bis (criminal and mafia association) of the Italian Criminal Code or of other offences included in Article 416 bis of the Italian Criminal Code or for favouring the aforementioned offences (Article 7 of Law no. 203 of 12th July 1991).

6.2 Relationship with the public administration

The I.P.R.S. E.T.S. acts in compliance with the relevant regulations in its contacts with the Public Administration.

In its contacts with officials, public workers or persons in charge of public services, the Recipients scrupulously act in accordance with the principles of fairness, transparency and loyalty and avoid any form of collusion or deception. Under no circumstance, may the Institute or its personnel offer or promise money or other advantages in any form, even indirectly, to public officials, persons in charge of public services and any other person operating on behalf of the Public Administration, except for gifts of small value, provided that these are in compliance with internal procedures. Any request by public officials or persons in charge of public services in this regard must be immediately reported to the relevant bodies and the Supervisory Board.

The I.P.R.S. E.T.S. requires the Recipients of this Code to behave collaboratively with Public Authorities. It is forbidden to provide false or incomplete information to Public Authorities, even if such conduct appears to be the most advantageous for the Institute.

6.3 Relationships with employees and collaborators

The I.P.R.S. E.T.S. guarantees a safe working environment to safeguard the physical and psychological health of workers, in compliance with the applicable laws. The Institute carries out an assessment of the personnel to be hired and promoted ensuring equal opportunities to all those concerned, while avoiding any form of discrimination that is not justified by the requirements of the tasks that the worker will receive.

In addition, the Institute prepares appropriate employee recruitment forms and all selection procedures must allow for the participation of as many candidates as possible.

All employment relationships apply the relevant laws and guarantee all the rights that workers are entitled to. The I.P.R.S. E.T.S. rejects any form of irregular or illegal work. All workers must be paid a salary commensurate with their tasks; at the same time, the Institute timely provides for all the payroll costs that employers must pay by law, while offering ongoing training opportunities for workers in connection to their tasks and duties.

The I.P.R.S. E.T.S. promotes a serene working environment, where any form of physical or psychological harassment (i.e. mobbing) is avoided and commitment, meritocracy and dedication are promoted.

All employees and collaborators, at all levels, must comply with the law, the Model and the Code of Ethics and report any violations to the Supervisory Bodies.

Employees are required to behave correctly, loyally and cooperatively with their colleagues, while refraining from any form of discrimination or harassment. All employees and collaborators are required to act with diligence.

Employees and collaborators are required to avoid any conflict of interest and if such situations arise, to report them immediately to the Supervisory Bodies.

6.4 Relationships with suppliers and distributors

Suppliers and distributors are selected on the basis of their skills and professionalism, reliability and efficiency. The I.P.R.S. E.T.S. contractually binds suppliers and distributors to adopt an ethical conduct and where they have not adopted their own code of ethics, they must expressly accept the provisions of the I.P.R.S. E.T.S.'s Code.

Before entering into business relationships with suppliers and distributors, the Recipients of this Code of Ethics must check the legal and financial information available on these potential business partners.

Should any employee or collaborator be offered money or other benefits by a business partner in view of obtaining privileged or inappropriate treatment, they must immediately inform the supervisory body or their superiors. It is absolutely forbidden to accept money or other benefits that might influence the choice of suppliers or the contractual conditions applied to them. All contracts signed by the I.P.R.S. E.T.S. must contain an express termination clause in the event of non-compliance with the Code of Ethics.

6.5 Relationships with Certification Bodies

Relationships with Certification Bodies are inspired by the principles of loyalty, fairness and collaboration. The I.P.R.S. E.T.S. collaborates with control and certification bodies, grants access to its facilities, makes available all the necessary documentation and encourages dialogue in the workplace.

Misleading certification bodies through false, deceitful or biased information is strictly forbidden. Certification Bodies must be selected on the basis of their reliability. The I.P.R.S. E.T.S. does not resort to Certification Bodies that have conflicts of interests and prevents all employees and external collaborators from offering or promising money or other benefits in exchange for undue advantages or certifications.

6.6 Relationships with the community

Any sponsorship of cultural, sporting or artistic events must take place with the utmost transparency and in such a way as to exclude any conflict of interest.

7. Approval, updating and dissemination

This Code is approved by the I.P.R.S. E.T.S. and may be modified by the same procedures followed for its approval. The I.P.R.S. E.T.S. provides for a periodic review of the Code of Ethics and the Organisation and Management Model, in an effort to keep them updated with any regulatory changes and company practices.

The I.P.R.S. E.T.S. undertakes to distribute this Code to all Recipients. In particular, it provides all employees with a copy of the Code of Ethics upon hiring. In order to ensure the correct understanding of the Code of Ethics and the Organisation and Management Model, the Institute prepares and organises a training programme aimed at promoting knowledge of the principles and rules governing its activities.

All those who enter into contracts or agreements with the I.P.R.S. E.T.S. must read the Code of Ethics before signing them and undertake to respect the ethical principles listed therein, while guaranteeing that their actions comply with them. This commitment is present in contractual clauses; non-compliance with this constitutes grounds for termination of the contract.