



CODE OF ETHICS

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Part I: Preamble

Venice International University (VIU), also referred to in this document as an "institution" or an "entity", is a complex organisation whose members have different backgrounds, whose roles and responsibilities are heterogeneous and who conduct a large number of different types of relations. The institution is a community in which individual rights have to be recognised and respected and all its members must accept their duties and responsibilities.

Aware of the important social and formative function of scientific and educational institutions, VIU reflects the values which have always been the foundations of scientific research, of teaching and of the many other types of formative activity and bases its work on these values in order to forward the institution's excellence, honour and good name, to assist it in creating an environment which encourages dialogue and correct interpersonal relations, which is open to and ready for exchanges with the international scientific community and which educates its members to personal values and formation in all their aspects.

VIU requires its members (administrators, professors, researchers, collaborators, technical and administrative staff), students and other persons who have relations with VIU, in addition to all other members of the institution in the broad sense of the term, to respect, safeguard and courageously foster the cardinal values of university institutions while they go about their duties and in relation to the roles they assume both individually and in collective bodies. Among these values are:

- (a) human dignity;
- (b) the rejection of all forms of unfair discrimination and the recognition of both merit and individual and cultural diversity;
- (c) the advancement of fundamental liberties and rights;
- (d) responsibility to the community and the acknowledgement and performance of their duties to the community;
- (e) honesty, integrity and professionalism;
- (f) knowledge, excellence, encouragement of scientific studies and research;
- (g) fairness, impartiality, loyal collaboration and transparency.

VIU identifies itself with the values preserved in the Italian Constitution, especially as regards the promotion of culture and scientific research (Article 9), the freedom of teaching (Article 33) and capable and deserving students' right to attain the highest levels of education; and with the fundamental principles laid down in the institution's Charter and Regulations.

The values recognised in this Preamble determine the standards of behaviour to be adopted:

- (a) in setting out and interpreting the ethical issues regulated in Parts II and III of this Code;
- (b) in setting out and interpreting other ethical issues relevant to university activities and life.

This Code does not take the place of the law, but adds to current law in which rights and duties are enshrined.

Part II: Rules of conduct

Article 1: Rejection of all forms of unfair discrimination

All members of VIU have the right to be treated in a spirit of understanding, equal respect and consideration and not to be unfairly discriminated against, either directly or indirectly, on the grounds of one or more factors including religious belief, gender, sexual orientation, conscience and personal convictions, physical appearance and colour of the skin, language, ethnic or social origins, citizenship, personal and health conditions, pregnancy, family choices and age.

Direct discrimination is practised when a person is treated less favourably than another person is, has been or would have been treated in a similar situation.

Indirect discrimination is practised when an apparently neutral rule, criterion or practice can put persons who fall under one of the categories referred to in the first paragraph at a disadvantage, unless such rule, criterion or practice is objectively justified by a legitimate purpose and the means adopted for its attainment are appropriate and necessary.

In order to assure full equality in the various aspects of life on campus, the principle of non-discrimination does not prevent VIU from keeping in being or taking specific measures to avoid or compensate for disadvantages arising from any one of the circumstances referred to in the first paragraph. VIU rejects habitual and persistent discriminatory or intimidating behaviour with respect to a member of the University on the part of persons in a superior position or other colleagues taking the form of psychological persecution or moral violence which cause a deterioration in working conditions or are likely to impair the victim's health, professionalism, existence or dignity, and adopts appropriate strategies to discourage such conduct.

VIU rejects unreasonable social prejudices in all their forms, all irritating or annoying behaviour adopted for one of the reasons referred to in the first paragraph, all stigmatising, degrading or humiliating practices, which are manifestations of the concept of the supremacy or moral superiority of one group over another. It is the duty of VIU and of its members to encourage initiatives which seek to safeguard and value disadvantaged categories and individual and cultural diversity.

Article 2: Sexual abuse and harassment

VIU does not tolerate sexual abuse or harassment in the sense of discriminatory conduct that is harmful to a person's human dignity and ensures that victims are given solicitous protection free of prejudice.

Sexual abuse and harassment are defined as requests for sexual favours and/or unwelcome proposals of sexual services and/or degrading attitudes or verbal expressions regarding the sexual sphere directed against a person, irrespective of his or her gender or sexual orientation.

If there is an asymmetrical power relationship between the molester and the victim, this is a factor which aggravates the seriousness of the abuse or harassment, since the circumstances may be such that:

- (a) acceptance on the part of the victim may be either implicitly or explicitly a condition for access to, employment in or the continuation of a relationship with the institution; or

- (b) acceptance or refusal may constitute – entirely or partially, implicitly or explicitly - a factor in the evaluation of the victim for employment, promotion, advancement in a career or other decisions regarding him or her; or
- (c) the purpose or effect of the abusive or harassing conduct may be the creation of a hostile, threatening or offensive environment which is likely significantly to diminish the victim's performance at work.

In view of the institution's educational role, sexual abuse or harassment of students on the part of teaching staff is a particularly grave offence.

Article 3: Academic freedom

VIU undertakes to create an environment which encourages the ideals of individual freedom and autonomy as the necessary prerequisite for excellence, teaching, professionalism, research and intellectual exploration on the widest possible range and the pursuit of knowledge.

In exercising their academic freedom, members of VIU are expected to conduct themselves honestly and responsibly. One of the ways that they can do this is to adopt self-discipline systems in presenting the methodology, results, integrity and ethical impact of their research work to the scientific community and to society in general.

Members of VIU are also obliged to respect and collaborate with the organisational decisions that the institution takes with a view to the efficiency, equity, impartiality and transparency of its administrative procedures.

Article 4: Intellectual property and plagiarism

Unless otherwise instructed, the members of the institution must observe intellectual property and plagiarism laws.

The author of an intellectual work that belongs to VIU should not make use of it for his or her own purposes and should keep the results obtained from it confidential until they are officially divulged.

In view of the importance of scientific research to society, VIU believes that its results must contribute to the growth and well-being of the community; VIU, therefore, is presumed to have the intellectual property rights to these results, within a reciprocal relationship in which the objectives of the utilisation of the results of research are agreed among those concerned.

Plagiarism is defined as the partial or total attribution to oneself or to another author of other persons' words, ideas, research or discoveries, regardless of the language in which these are officially presented or divulged, or not quoting their sources. Plagiarism may be deliberate or the result of carelessness.

Academic work of scientific importance carried out collectively must specify, if requested, the collaborator responsible for its individual parts. It is the duty of all group coordinators to:

- (a) foster conditions which allow each member of the group to work with integrity, honesty, professionalism and in freedom;
- (b) recognise individual merit and determine the responsibilities of each member of the group;
- (c) prompt dialogue, cooperation, criticism and discussion and encourage the development of ideas and personal ability, especially when trailblazing research

is conducted, or work which requires a complex and/or multidisciplinary approach.

Article 5: Conflicts of interests

A conflict of interests arises when the private interest of a member of VIU, excluding students in that they are learners, actually or potentially conflicts with the interests, and not only the economic interests, of the institution. Such conflicts also regard external working relations with other educational establishments or universities that are potential competitors.

For the purposes of this Code, the private interests of a member of the institution may involve:

- (a) the person's immediate interest as a member of VIU;
- (b) the interest of a member of VIU's relative;
- (c) the interests of entities or physical or legal persons who do not hold shares of VIU's capital with whom a member of VIU is in an employment or commercial relationship;
- (d) the interests of entities or legal persons which a member of VIU controls or in which he or she has a significant financial stake;
- (e) third party interests if immediate advantage may be derived from them for a member of VIU;
- (f) the interest of entities or physical or legal persons who have a stake in VIU's capital with whom a member of VIU is in an employment or project work relationship if this is in open conflict with VIU's aims.

A member of VIU who has interests that conflict with those of the institution in a certain transaction or circumstance must inform the body or the person responsible or his or her hierarchical superior immediately or abstain from any resolutions or decisions in the matter.

Article 6: Nepotism and favouritism

VIU disapproves of nepotism and favouritism since they are incompatible with human dignity, the rewarding of individual merit, honesty, integrity, professionalism, academic freedom, equity, impartiality and transparency and requires professors, researchers and all other members of the institution to abstain from this custom and to report cases of suspicious conduct without fear to the Ethics Committee.

Nepotism occurs when a professor, researcher, member of the technical or administrative staff or any other collaborator, directly or indirectly – and this also in the event of recourse to external funds – uses his or her position of authority or persuasive capacity to grant benefits, further appointments or nominations or influence recruitment procedures, especially, but not exclusively, in the initial phase of the preparation for a scientific career (scholarships, contracts, research grants) or of the entry into the institution of a son or daughter, a relative or a partner, including relatives by marriage.

In the case of a scientific career nepotism is presumed if:

- (a) the scientific or disciplinary sector of the patron coincides with that of the protégé, or if there is an affinity between them; or
- (b) the protégé is to perform his work in the same sphere of activity as that of the patron.

Similar to nepotism is the practice of favouritism on the part of a professor to his students. This arbitrary behaviour offends VIU's good name, the values of honesty and impartiality and the interests of other objectively worthy and excellent candidates in the starting phase or in the subsequent stages of their academic, scientific or professional career.

The investigation of cases of possible nepotism or favouritism on the part of the Ethics Committee requires an approach which considers the context and the circumstances in order to weigh the different factors in play and avoid discriminating arbitrarily against objectively worthy and excellent candidates.

Article 7: Abuse of position

Members of VIU may not, either directly or indirectly, use the power of their academic status or official position to force other members of the institution to do work or provide services to their advantage unless such work or services may be described as a legal obligation on the latter. Abuse may also occur in the form of conduct which may not be unlawful in itself but is plainly in breach of the spirit of VIU's rules and regulations.

Article 8: Use of the institution's resources

Members of VIU must use its resources responsibly and diligently in such a way as to be able to justify expenditure and produce satisfactory documents or statements of account at the institution's request.

No member of VIU may use, or allow outside persons or entities to use, research equipment, space or human, material or financial resources belonging to VIU for personal aims and/or for purposes other than those of the institution and in any case not without the institution's express approval.

Article 9: Use of VIU's name and reputation and relations with the media

All members of VIU are to respect its good name and not cause harm to its reputation.

In their relations with the media members of VIU must abide by the principles of transparency and openness while complying with the duty of confidentiality laid down in Article 11.

Unless expressly authorised to do so, no member of VIU may:

- (a) make improper use of VIU's logo and name;
- (b) make improper use of the institution's reputation in association with professional services, employment, appointments or other outside activities, even if they are not remunerated;
- (c) express strictly personal points of view using VIU's name.

Article 10: Gifts and benefits

Members of VIU may not solicit, and must refuse, all non-symbolic offers of gifts or benefits that are likely to influence the performance of their work, even indirectly.

They may accept spontaneous offers of gifts or benefits of merely nominal value made at cultural meetings, during visits or at public scientific conferences, always provided that their acceptance does not have the slightest effect on the performance of VIU's activities.

Members cannot either promise or donate money or other benefits in their private relations with suppliers, advisors or third parties in general.

At meetings or promotional events articles of modest value such as books or magazines may be handed out. The presentation and description of the article are annotated in a register kept for the purpose.

Article 11: Privacy and confidentiality

All members of VIU:

- (a) are to respect the privacy of the persons or entities whose confidential information is held by the institution;
- (b) must not reveal confidential information arising from their participation in the institution's governance bodies.

Article 12: Use of applications and computer networks

Members of VIU, including the students, must use the hardware and software equipment at their disposal only for purposes related to the performance of their duties or for study and in any case in compliance with the institution's aims.

Specifically, members of VIU must:

- (A) observe the institution's security policies in order not to jeopardise the functionality and level of protection of its information systems;
- (B) not make unauthorised copies of the software installed;
- (C) respect e-mail rules;
- (D) not browse sites for reasons not directly related to their position or service or that are not connected with searches for documents for study purposes.

The members of the institution must refrain from acting in any way that leads to modifications to the computer or online systems or to the manipulation of the data stored in these systems even if this might only potentially be such as to cause other persons unfair harm.

Article 13: Safety, health, hygiene and the environment

In the sphere of current health and safety legislation, VIU undertakes to take all the measures necessary to safeguard the physical and moral integrity of its members and of all those who work or stay in the spaces and structures that it runs. For this purpose, VIU fosters the diffusion of a culture of safety and awareness of the risks associated with the work performed in its offices, requiring its members at all levels in the organisation to behave responsibly and in compliance with health and safety at work procedures.

Health and safety at work must therefore be considered as also extending to persons belonging to outside firms who work in the institution: these persons must comply with the regulations for the sector in order to prevent risks to their own safety and that of others.

Specifically, VIU undertakes to ensure that:

- (a) observance of the current laws in the matter is considered a priority;
- (b) appropriate and sufficient resources are allocated to ensure workers' safety, hygiene and health;

- (c) risks to workers are avoided as far as possible and to the extent that technical developments allow, also by selecting the materials and equipment that are most suitable and most likely to mitigate risks;
- (d) unavoidable risks are correctly assessed and suitably mitigated by recourse to appropriate collective and personal safety measures;
- (e) information and instructions for workers are circulated and updated and are specifically related to the workers' various duties and to risk assessment and management procedures;
- (f) workers are consulted regarding health and safety at work;
- (g) any urgent situations or nonconformities in the matter of safety which come to light during working activities, investigations or inspections are dealt with rapidly and efficaciously;
- (h) work with its organisational aspects is organised in such a way as to safeguard the health of workers, other parties, students and all the members of the institution.

All members of VIU in general who are involved in safety management in any capacity are under the obligation, within the sphere of their various responsibilities, to make use of the authority and powers vested in them and to implement the procedures and the prevention and protection measures that have been adopted in order to safeguard against the risks to safety that are set out in the institution's Risk Assessment Document.

Specifically, in order to take effective action to prevent risks and in compliance with the requirements of Legislative Decree 81/2008, as subsequently amended and added to, and also in compliance with the allocation of roles, duties and responsibilities in the matter of safety:

- (a) the employer and the functions involved in safety management in any capacity are expressly requested to carry out the health and safety at work duties that have been assigned to them by the institution in compliance with the authority and powers that have been vested in them and in compliance with the prevention measures that VIU has adopted and existing VIU procedures, seeing that they inform and train personnel who are exposed to safety risks in performing their work;
- (b) the persons appointed by VIU or elected by the personnel in accordance with Legislative Decree 81/2008 (e.g. the Health and Safety at Work Manager, prevention and protection staff, persons responsible for the implementation of fire prevention measures, for fire fighting and for the evacuation of workers in the event of danger, first-aid staff, the Company Doctor and workers' Safety Representatives) are expressly requested, all within the sphere of their responsibilities, to perform the health and safety at work duties that have been specifically assigned to them in accordance with current law and with VIU's health and safety system;
- (c) all employees are expressly requested to safeguard their own health and safety and the health and safety of all the other persons who have access to VIU, to observe the measures and safety procedures that the institution has adopted and to abide by the instructions that they are given.

VIU is aware of the collective primary interest in safeguarding its environmental and social surroundings. Its objective is to enhance its work in this sphere, improving its environmental performance by taking all the appropriate measures to limit the environmental impact of its activities in compliance with applicable legislation and the best general corporate practices. VIU

also undertakes to take the necessary steps to make all its members aware of the need to care for and respect the environment.

Article 14: Relations with suppliers and professionals

VIU manages the process of the acquisition of goods and services on the basis of principles of openness and fairness.

Openness in relations with suppliers is ensured as follows:

- (d) rules and mechanisms for the selection and management of suppliers are followed which take into account the extent of their technical, economic and financial reliability and the level of their social responsibility;
- (e) uniform methods for the management of suppliers are laid down so that all suppliers have equal opportunities;
- (f) monitoring criteria and systems are laid down and applied for constant control over the quality of the services provided and the goods supplied.

Article 15: Relations with public authorities

VIU's relations with public authorities, public officers and similar persons and organisations must be based on the strictest observance of the applicable laws and regulations and in no circumstances may call the integrity or reputation of the institution into question.

The assumption of commitments to public authorities is the sole responsibility of the members of VIU deputed to do so or of other duly authorised members of staff.

If possible VIU's relations with public authorities should be traceable.

In relations between VIU and the public authorities, including those not of a commercial nature, the members of the institution involved must refrain from:

- (I) offering money, benefits or other advantages in general to an official or his family or to persons in any way directly connected with him or her;
- (II) illicitly seeking out or initiating personal relationships involving favours, influence or intrusions likely either directly or indirectly to condition the outcome of the relationship.

Article 16: Relations with the institutions and supervisory authorities

VIU handles relations with public institutions on the basis of the principles of integrity, fairness and professionalism.

Members of VIU must scrupulously observe the legislation in force in the sectors related to their respective areas of activity and the provisions issued by the competent authorities and supervisory bodies.

In the framework of its relations with local, national, Community and international public institutions and with supervisory authorities, VIU undertakes to see that no untruthful applications or requests are submitted in order to obtain public funds, grants, concessionary loans, scholarships, authorisations or administrative licences.

Similarly, when VIU takes part in public tender procedures, its members must act in full compliance with the law and fair business practice, especially refraining from conduct which might lead authorities to act improperly in its favour.

Members of VIU must verify that the public funds, grants or concessionary loans given are actually used to carry out the activities or projects for which they are intended.

VIU follows similar principles in its relations with internal supervisory bodies such as the Auditors and the members of the Supervisory Board appointed in accordance with Legislative Decree 231/2001.

Article 17: Relations with the judicial authorities

VIU collaborates with the judicial authorities and with bodies delegated by these authorities.

In the event of investigations, inspections or inquiries, all existing documents are put at the judicial authorities' disposal; it is prohibited to destroy or alter records, reports, entries or any other types of document and to issue false or partial declarations or induce others to do so.

The above is without prejudice to the right of a person under investigation or on a charge not to incriminate himself.

Article 18: Prevention of money laundering

VIU conducts its activities in full compliance with current anti-money laundering law and the competent authorities' instructions regarding this matter, and accordingly refrains from carrying out transactions involving money which is suspected of having been obtained as a result of criminal activities.

The members of the institution must:

- (a) as far as possible, verify the information available regarding the users, counterparties, suppliers and advisors involved before carrying out a transaction in order to form an opinion of the lawfulness of their activities before entering into any relationship with them which might entail obtaining goods or sums of money for the institution;
- (b) to act in such a way as to avoid any complicity in transactions which are likely, even potentially likely, to aid in the laundering of money of illicit or criminal origin, operating in full compliance with primary and secondary anti-money laundering legislation and the internal control procedures set up for this purpose.

Article 19: Accounting records and financial statements

The accounts must be kept strictly observing the general principles of truth, accuracy, completeness, clarity and transparency in making entries.

Members of VIU must refrain from any conduct which either directly or indirectly breaches the standards referred to in the previous paragraph or the internal procedures governing the preparation of accounting documents and their representation to the outside world.

The aim of VIU's accounts and financial statements must be to provide a true and fair view of the institution's financial position, performance and cash flow in compliance with current legislation and accounting standards.

Article 20: Grounds for decisions

Members of VIU in top management positions must always provide satisfactory and objective grounds for important decisions, including those affecting the positions or careers of other members of the institution, and those regarding the description or promotion of educational activities.

Part III: Implementation

Article 21: Observance and breaches of the Code of Ethics

In conformity to the provisions of the Preamble and the Rules of Conduct, it is also the duty of professors, researchers, technical and administrative staff, students and all other persons who collaborate with the institution:

- (a) to read this Code and its interpretative practices;
- (b) to familiarise themselves with the standards of conduct laid down in this Code and those that emerge from its interpretative practices;
- (c) to consult the Ethical Committee for advice on the application of this Code and on how to behave in circumstances such as those referred to in this Code;
- (d) to observe this Code and its interpretative practices, also promptly reporting behaviour whose conformity to the Code is in doubt to the Ethics Committee.

In compliance with civil, criminal and administrative law, if this Code is found to have been breached, this may constitute grounds for the imposition of disciplinary sanctions by the competent bodies.

Respect for the values enshrined in this Code of Ethics, formalised in contractual agreements, is an essential part of the obligations assumed by all those who conduct business relations with VIU. Consequently any violation of the Code may constitute a breach of contract with the legal consequences of their actions

The Board of Directors is responsible for approving and amending this Code of Ethics.

Article 22: Ethics Committee

It is the institution's duty to form an Ethics Committee after deciding its composition, its term of office, its functioning and the procedures for appointing its members.

The Ethics Committee:

- (a) has consulting, research, investigative and control functions with respect to the implementation and observance of the rules in this Code and its interpretative practice;
- (b) assists, if possible, in the amicable resolution of any disputes that arise;
- (c) may suggest disciplinary action against persons in breach of the Code to the competent bodies;
- (d) submits proposals to the competent bodies for the revision of or additions to this Code.

Ethics Committee decisions must be justified and the decisions themselves must be recorded in a book of Ethics Committee decisions.

Article 23: Circulation and implementation of the Code of Ethics

It is VIU's duty to foster the widest possible circulation of this Code, also among third parties, through publications, communications, meetings, teaching activities and all other means which it considers suitable for this purpose.

VIU takes prompt action for the implementation of this Code with all the means at its disposal in cases in which it considers this necessary.

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