



CODE OF ETHICS AND CONDUCT

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by the Office for General Affairs and Administrative Transparency

PREAMBLE

The University of Trieste is founded on the principles of academic excellence, integrity and responsibility, democracy, freedom of teaching and research. It is committed to promoting a study and research environment that values freedom of thought, inclusiveness and mutual respect. The University is committed to ensuring an environment in which the dignity of every person is recognised and protected.

By issuing this Code of Ethics and Conduct, the University aims to provide its community with a guide for daily activities, promote values such as justice, solidarity, trust and sustainability, and contribute to the development of a more equitable and responsible society.

Everyone in the community is expected to know, respect and disseminate this Code's principles, so that the University can fulfil its educational and research mission, in compliance with ethical and legal rules.

TITLE I – GENERAL PROVISIONS

Article 1 – Code of Ethics and Code of Conduct

1. The Code of Ethics and Conduct (hereinafter the Code) establishes the ethical principles and rules of conduct that govern the activities of all members of the University community. It sets out the University's commitment to building trust and cooperation within its community, which is fundamental for the achievement of academic goals and for scientific and cultural progress.

2. The Code promotes merit and excellence, encourages dialogue with the national and international scientific community, and supports the creation of a professional environment based on mutual respect and the protection of human values in all their forms. In addition, the Code promotes responsibility, rigour in administrative activities and social, institutional and individual commitment, placing ethics, trust, freedom of teaching and research, results and appropriate behaviour at the heart of academic activities.



3. The Code promotes the ethical use of technologies, including artificial intelligence, by encouraging responsibility in the face of dual-use research, ensuring any associated risks are identified and minimised.

4. The Code governs, in specific chapters and sections, the duties and obligations common to all University staff as well as the obligations specific to each staff member and students.

5. The Code is adopted in accordance with the provisions of the Code of Conduct for Civil Servants laid down in Article 54 of Italian Legislative Decree No 165 of 30th March 2001 No. 165 (hereinafter the National Code of Conduct).¹

The Code also implements and details the provisions of Article 6 of the University Statute and is consistent with the provisions concerning: research integrity and ethics; the prevention of harassment in the workplace or place of study to safeguard the rights and dignity of the individual; the functioning of the Disciplinary Board and provisions for the conduct of disciplinary proceedings against University professors and researchers; the teaching duties of professors and researchers; the procedure for granting authorisation to professors and researchers to work outside the University; the academic career of the student; the use of e-mail and the Internet; the protection of personal data; the use of social media; the reporting of alleged unlawful conduct against the University of Trieste (whistleblowing); and any other University rule on the subjects covered by the Code.

Article 2 – Scope of application of the ethical principles

1. The provisions of Title II of this Code apply to the entire University community, identified as follows:
 - a) Professors (*professori*) and researchers (*ricercatori*), who are still considered part of the community when visiting other institutions; visiting professors and researchers from other universities; professors emeritus (*professori emeriti*) and honorary professors (*professori onorari*); senior scholars; managers (*dirigenti*); technical and administrative staff (*personale tecnico e amministrativo*), including language assistants (*collaboratori ed esperti linguistici*) and technicians (*tecnologi*);
 - b) teaching and research fellows (*titolari di contratti di didattica e di ricerca*);
 - c) collaborators and consultants of any kind, including those working on a voluntary basis, as well as collaborators of the bodies conducting work or supplying goods or services to the University;
 - d) PhD students and research assistants (*assegnisti di ricerca*);
 - e) recipients of scholarships or research grants (*borse di studio o di ricerca*) and interns (*tirocinanti*);
 - f) students of all degree courses held at the University of Trieste or at any of its partner universities in conjunction with the University of Trieste (*corsi interateneo*); students taking vocational courses (*corsi professionalizzanti*) or specialisation degree courses (*corsi di specializzazione*) in the framework of exchange programmes with other national or international universities;

¹ Italian Presidential Decree No 62 of 16th April 2013 laying down the Italian Code of Conduct for Civil Servants, as amended by Decree Law No 36 of 30th April 2022 and by Presidential Decree No 81 of 13th June 2023; Article 2(4) of Italian Law No 240 of 30th December 2010 'Rules on the organisation of universities, academic staff and recruitment, and delegation to the Government to promote the quality and efficiency of the university system'; Article 54(5) of Italian Legislative Decree No 165 of 30th March 2001 'General rules on the organisation of employment in public administrations'.



- g) personnel from other entities who perform their duties at the University in any capacity;
- h) members of academic bodies and collegial organs of the University or of bodies controlled by UniTS.

Article 3 – Scope of the rules of behaviour

1. The provisions of Title III on behavioural obligations:

- a) constitute general principles of conduct for staff governed by public law (teaching staff and research staff – hereinafter referred to as ‘academic staff’) and apply insofar as they are compatible with the provisions of their respective legal systems;
- b) implement the Regulation detailing the Code of Conduct for Civil Servants according to Article 54 of Italian Legislative Decree No 165 of 30 March 2001 for managers as well as for technical and administrative staff, including language assistants and technicians (hereinafter referred to as ‘professional services staff’);
- c) apply, together with any necessary conforming changes, to research assistants, recipients of institutional teaching and/or research contracts, as well as to staff with any other assignments, scholarships and/or collaboration agreements;
- d) apply, together with any necessary conforming changes, to any individual who, by virtue of an organisational and/or contractual relationship, has a relationship with the University.
- e) apply to students, as provided for in the chapter dedicated to them.

Article 4 – Healthcare activities offered in Regional Health Service facilities

1. The provisions of this Code shall apply to the healthcare activities offered in Regional Health Service facilities by:

- a) professors, researchers, and technical and administrative staff as stated in the agreement between the Regional Health Service and the University;
- b) research assistants and PhD students authorised by the health authorities to carry out healthcare activities;
- c) junior specialist physicians;
- d) students of medical and healthcare undergraduate and postgraduate degree programmes.

2. Without prejudice to their legal status, the Code of Conduct of the healthcare facility in which the persons referred to in the previous paragraph work, study, teach or conduct research shall also apply, as shall the sanctions in the event of any infringement.

This is without prejudice to the University’s disciplinary power. The University retains the right to evaluate violations of the Code of Conduct of a healthcare facility in which a member of the university community works in accordance with its own regulations.

3. If the parties referred to in paragraph 1 believe that there are discrepancies or conflicts between the Code of Conduct of the Regional Healthcare Service and that of the University which lead to negative consequences, they may notify the Rector who will take appropriate measures.



Article 5 – Activities in other public or private bodies

1. The provisions of this Code shall also apply to any activities carried out by academic staff, professional services staff, research assistants, PhD students, students taking a specialisation degree course or other individuals operating in other public or private bodies on the basis of an agreement between the given body and the University. This is applicable in the case of work done both within and outside of national borders.
2. Without prejudice to their legal status, if a code of conduct exists and does not conflict with this Code at the body where the persons referred to in the previous paragraph work, study, teach or conduct research, then these persons are equally subject to the behavioural rules as well as the consequences outlined therein in the event of any infringement.
3. The persons referred to above, in particular, shall not engage in any conduct which could harm the image of the University during any activity carried out at other institutions, even if this activity is conducted by virtue of a relationship independent of the University.
4. The provisions of this Code also apply to staff involved in outsourcing activities.

Art. 6 – Relations with University controlled, participated or accredited bodies

1. Institutions and bodies that are directly or indirectly controlled by the University shall adopt rules of conduct in line with the principles set out in this Code.
2. The University shall promote the adoption of ethical and behavioural discipline consistent with the principles set out in this Code among public and private bodies that are participated in or accredited by the University.
3. University members who work in University spin-offs, start-ups, or participated bodies are required to carry out their activities in compliance with the rules of this Code.

TITLE II – ETHICAL PRINCIPLES OF THE ACADEMIC COMMUNITY

Article 7 – Objectives and general principles

1. Each individual within the University community is expected to respect, implement and promote the values with which the University identifies and to which it adheres in all aspects of its work. To this end, the Code refers to the following values and draws them to the attention of each individual as points of reference for better understanding the main ethical commitments that derive from these values and that are explained in the articles below.
2. The main reference values include:
 - a) the dignity of the human person and its centrality across all aspects of research, innovation and development, communication and dissemination. The recognition of dignity also includes the enhancement of individual and cultural merit and diversity, as well as the care of individual talents, respect for privacy and the protection of copyright;



- b) freedom in all its forms, including freedom of research, teaching and expression;
- c) equality, which is also expressed as non-discrimination, solidarity, equanimity, equal opportunities, protection and inclusion of the most vulnerable or disadvantaged individuals, 'accessibility' in its various forms, repudiation of favouritism of any form and impartiality;
- d) the health and psychophysical wellbeing of individuals, which also implies the health and safety of study and work environments, both at the physical and relational level;
- e) environmental, social, economic and energy sustainability, which are related to the proper management of public assets and resources, and to their use for the common good;
- f) impartiality, good performance, legality and accountability, which are taken to include fairness, honesty, integrity and professionalism, loyal cooperation, transparency, compliance with deadlines and established workflows, the correct use of technologies (especially those based on artificial intelligence) as well as the correct use of resources and of research and education results;
- g) dialogue for the development of knowledge, which is particularly expressed through cooperative studies and research, as well as in the debate, exchange and sharing of knowledge, contributing to the development of 'scientific diplomacy' and the active promotion of peace;
- h) democracy as a value that inspires decisions-making processes as well as the functioning of organs and elected offices, in which the University favours and promotes the participation of all its members.

Article 8 – Protection of the dignity and health of the individual

1. The University combats all forms of abuse and harassment and, to that end, seeks to ensure a safe and healthy environment in which interpersonal relationships are grounded in fairness and respect for the freedom and dignity of the individual.
2. The University does not tolerate any kind of harassment because it undermines the dignity of the individual. Members of the academic community are morally obliged to report instances of harassment when they become aware of them. Therefore, besides instances of complicity, passively witnessing such behaviours may also entail a joint liability.
3. Any behaviour that is unwanted by those who suffer it, as defined by current legislation and regulations, constitutes sexual or moral harassment. An aggravating circumstance is defined as the existence of a position of asymmetry or hierarchical subordination between the harasser and the victim, in particular where such conduct is imposed in the context of access to employment and career progression. Harassment and moral harassment, sexual abuse and unwanted attention when directed towards students, also perpetrated through language, are particularly serious. Any form of retaliation against anyone who denounces any form of harassment, shall also be regarded as harassment.

Art. 9 – Equality, non-discrimination, equal opportunities and impartiality

1. The University rejects and combats all forms of discrimination on the grounds of religion or belief,



personal or political opinion, gender, sexual orientation, physical appearance, race, skin colour, ethnic origin, language, citizenship, nationality, disability, personal, social or health conditions, pregnancy, family choices, age or academic role.

2. To that end, in order to ensure full equality across all aspects of university life, the University will seek to take measures to prevent and eliminate situations of inequality attributable to any of the reasons referred to in the previous paragraph.

3. The University promotes the use of new technologies and endeavours to ensure the exercise of 'digital rights' by all members of the community, in particular through the progressive development of on-line services. In order to achieve this, the University shall work to prevent and remove any obstacles that prevent full, equal access to information or information and communication technologies, paying particular attention to the requirements of disabled users, as well as situations of economic and social hardship.

4. The University and its members are responsible for encouraging initiatives which protect and safeguard disadvantaged groups as well as individual and cultural diversity.

5. The University promotes equity and fairness, rejects and fights favouritism in any form – including nepotism – as it undermines the dignity of the individual. Favouritism prevents the recognition of individual talent and merits, honesty, integrity, professionalism, and academic freedom. Favouritism also damages the good name of the University.

6. The University seeks to prevent and fight against any form of bias that may arise from an actual or potential conflict of interest.

7. The University recognises and values individual merit as a fundamental criterion for personal and professional growth, using it as an objective parameter for evaluation and selection in recruitment and career progression, based on the skills, knowledge and experience demonstrated by individuals.

8. Teaching staff shall transmit knowledge with diligence, punctuality and rigour, as well as with respect for students, their rights and their culture, ensuring impartiality in assessing their preparation.

9. Members of the University community are also required to work collaboratively and ensure that all of the University's institutional activities are transparent, impartial, fair and efficient. They are also required to respect people in their communications, interactions and in how they refer to third parties, in both written and verbal communication.

Article 10 – Freedom of study, research, teaching and dissemination

1. The University guarantees the members of its community an environment organised in accordance with the ideals of individual freedom and autonomy.

2. Academic staff have the right and duty to conduct research and teaching, with full freedom to choose the subject and methodology of their research as well as the content and didactic design of their teaching courses. They freely develop institutional public engagement activities, as well as individual dissemination activities through conferences, seminars, and public and editorial activities in compliance with their institutional obligations.



3. Students shall engage in educational as well as in public engagement activities with respect for the University and its facilities, their colleagues, academic staff, technical and administrative staff, language assistants, technicians and any other individual supporting the activities carried out within the institution. This does not negate students' right to express their needs or complain through the appropriate institutional channels at any time.
4. The University promotes and encourages all forms of knowledge dissemination, not only through traditional methods, but also by promoting open access publications (open archive) for both the consultation and dissemination of research and teaching materials in the forms provided for and permitted by University regulation. In this regard, the University encourages the development and use of open access among research staff.
5. The University recognises and protects research integrity, which is based on the respect of ethical principles, professional standards and ethical duties by those who carry out, fund, evaluate or promote research, as well as by the institutions involved. The University recognises the social relevance of research and is committed to sharing methodologies, results, and the social impact of research with the research community and society. It also strives to ensure that research results contribute to collective development and wellbeing and that research is conducted in accordance with the ethical principles laid down in this Code.
6. In exercising academic freedom, members of the University are required to behave responsibly and comply with all ethical guidelines. In order to do so, they may also adopt further regulations.
7. The University condemns and prosecutes all forms of unfair behaviour by teachers, support staff and students, including fraud in research, as such behaviour undermines the reputation of the University, undermines society's trust in the research community, and wastes resources.

Article 11 – Wellbeing, health and responsible management of resources

1. Every member of the University community takes care of their own health and does not engage in behaviours that could put the health of others at risk.
2. Every member of the University community is required to respect and maintain health and decorum in places of work and study. If charged with an institutional role, the individual has an obligation to observe and report any breach in this obligation.
3. The management of the University's resources for the purposes of carrying out research, educational and administrative activities is carried out with respect for the environment and in compliance with the legislation on health and safety in the workplace. It must take cost-containment energy efficiency into consideration, without undermining the quality of the results of the various actions.

Article 12 – Responsibility, Accessibility and Transparency in institutional activity

1. In carrying out its institutional activities, the University requires effective cooperation, commitment, participation, honesty and loyalty from the governing body, management, administration, the members of the control, quality and assurance bodies, and the University community as a whole.
2. The University promotes responsible use of resources in accordance with the rules detailed in the



EU treaties and the Italian Constitution and encourages the adoption of responsible individual and collective behaviour in all University activities.

3. The University aims to achieve broad cohesion and collective participation in institutional life. In line with this objective, the University endeavours to ensure that students, the university community and all categories of stakeholders benefit from the greatest possible transparency and timely knowledge of political, managerial and administrative action, as well as from clear and comprehensible documents, in accordance with the principles of accessible language and social accountability.

4. To this end, the University shall use its institutional portal as the main integrated point of access to information and services relating to university life, and as a means of promoting the transparency of institutional documents and activities. In line with the principles for digital administration, the University ensures that its portal is characterised by high accessibility and ease of use. This entails suitable modifications for people with disabilities. The University ensures that information and materials are easy to find, complete, clear, homogeneous, reliable, and of a high quality.

Article 13 – Ethical aspects of public engagement

1. The University believes that knowledge is an essential resource for the growth of society and therefore considers dialogue with society and knowledge dissemination as important institutional objectives.

2. Public engagement activities should be carried out with a view to information, involvement, dialogue, debate, exchange of ideas, and contribution to community development. In its public engagement activities, the University adheres to the principles of research rigour, pluralism, and independence from any ideological, religious, political and economic influence.

Article 14 – Protection of intellectual property

1. The University considers excellence in research and the application of inventions fundamental to social progress and the improvement of quality of life. Members of the university community aim to manage research results, intellectual property and technology transfer in the public interest. This objective is pursued through institutional activities, collaborations with public and private bodies and extra-institutional activities relevant to University academic disciplines.

2. With regard to patents and other intellectual property rights, the rights of economic exploitation belong to the University and/or to individual inventors. This is in accordance with the law, University regulations and contractual agreements between inventors and the University. The University promotes the exploitation and management of intellectual property, collaborating with inventors and respecting the fair recognition required by law.

Article 15 – International relations

1. The University recognises the importance of international relations and their fundamental role in the development of research and the promotion of freedom of teaching. It is committed to creating an institutional environment conducive to the mutual exchange and internationalisation of research and education.

2. Members of the university community actively participate in the international scientific community



through research, educational and capacity building projects. In carrying out these projects, staff should conduct themselves correctly in their institutional role at the University and coordinate their activities with the competent administrative areas.

3. The University supports the international mobility of its students in order to improve the quality of their education, ensuring full recognition of the educational activities carried out abroad, in line with the study programme of their degree course. It takes measures to prevent loss of knowledge and promote equitable access to international mobility.

4. Members of the university community promote international mobility by sharing knowledge and relationships with foreign partners within the units in which they work. They also support the joint assessment of students' experiences abroad. They respect the different organisations of the partner universities and contribute to making the university known and appreciated abroad.

5. The University encourages international mobility projects and facilitates international students' access to higher education, removing any barriers in exchange relations. It promotes the mobility of students, researchers, teachers, and administrative and technical staff through agreements and networks, avoiding unidirectional flows. Members of the university community cooperate with the University administration for the possible use of agents or intermediaries in promoting educational programmes and recruiting international students, ensuring high quality standards. They ensure that promotional and information material disseminated abroad is accurate, complete and appropriate, with particular attention to access requirements, costs, forms of financial support and language requirements.

6. The University collaborates with international partners in line with the principle of equal treatment, enhancing the diversity and complementarity of research and teaching expertise. When offering courses and implementing projects in foreign countries, the University follows the principles of international organisations. Members of the university community shall respect any international principles and codes of ethics.

Article 16 – Access to information and communication technologies – digital rights and use of artificial intelligence (AI)

1. The University promotes the use of artificial intelligence as a means of supporting study, research, teaching and administrative decision-making, in full respect of the principles, rights and duties enshrined in this Code and in national, European and international legal systems. Under no circumstances should the use of these technologies undermine or replace decision-making, creativity, study, critical reworking, research and scientific production, nor should its use lead to the loss of specialist skills or to jeopardising the rights and dignity of the university community.

2. AI must always be used to enhance rather than substitute academic activities, ensuring that intellectual autonomy and critical capacity remain at the centre of all academic activities.

3. The University encourages the testing of AI systems in protected contexts and environments to ensure that these technologies are developed and tested responsibly.

4. In any event, the University promotes and implements tools and procedures aimed to control the use of artificial intelligence and to protect the University community from any misuse or distortion of it.



TITLE III – RULES OF CONDUCT

CHAPTER I – COMMON BEHAVIOURAL OBLIGATIONS

Article 17 – General principles

1. The University considers intellectual honesty, mutual respect and integrity essential for the achievement of its institutional objectives.
2. The provisions of this Code specify the behavioural obligations of Article 3 of the National Code of Conduct.
3. In any event, this Code guarantees all members of the University community the right to freedom of expression, to political and trade union activity, and to criticise.
4. As part of the University community, employees – as defined in Article 3(1) of this Code – contribute to the pursuit of institutional and strategic objectives according to the level of responsibility of their role and the duties assigned to them. Employees shall also demonstrate integrity, fairness, trust, good faith, objectivity, transparency, fairness, reasonableness, and consider results, cost-effectiveness and a responsible use of time and resources. They shall act independently and impartially, avoiding any conflict of interest.

Article 18 – Use of information and communication technologies and digital tools

1. The use of information and communication technologies and of institutional digital tools is only permitted for purposes related to work and institutional activity. This must not compromise the security or reputation of the University administration in any way. This is without prejudice to the information/consultation of trade union representatives. By way of example, information and communication technologies are the set of technologies used to process, manage and store information through the use of computers and digital systems. This includes hardware (computers, servers, networks, storage devices), software (operating systems, apps, databases) and network infrastructure (Internet, local area networks, cloud computing). Institutional digital tools include ordinary and certified email services, digital signatures, institutional accounts, document management platforms, multifactor authentication systems, cloud services, intranet portals, administrative management apps, and digital databases.
2. The use of non-institutional personal email addresses is normally avoided for activities or communications related to the University, except in cases of *force majeure*, i.e. when employees cannot access their institutional account for some reason.
3. Employees are responsible for the content of the messages sent and take all necessary security measures to prevent other persons from becoming aware of their authentication credentials to the University's computer systems.
4. Employees comply with the email signing methods identified by the University. Each outgoing message must identify the sender and must indicate an institutional address where they can be reached.
5. Employees are allowed to use the ICT tools provided by the University in order to carry out their duties without having to leave the place of employment, provided that the activity:



- a) is limited in time;
- b) does not impair any institutional tasks;
- c) does not compromise the security or reputation of the administration.

6. During working hours, employees shall refrain from frequent private phone calls and from repeated access to social networks and other web platforms for reasons unrelated to institutional activities, including on their own devices.

7. Employees are not allowed to send any messages which are offensive, discriminatory or which may be of liability for the University. This applies to emails and other information and communication technologies, both inside and outside the University.

8. The University guarantees the employee's right to disconnect, that is, the freedom not to respond to work communications outside of working hours or during a rest/holiday period without this compromising employment status.

Article 19 – Gifts and other benefits

1. Employees shall not seek gifts or other benefits for themselves or for others.

2. Employees shall not accept, for themselves or for others, gifts or other benefits unless they are of low value and exchanged occasionally in the context of normal courtesy, institutional relations, or in the context of international customs. In any event, irrespective of whether the act constitutes a criminal offence, employees shall not seek, for themselves or for others, gifts or other benefits, even of low value, in return for doing work or performing duties required by their role. This applies to seeking gifts from anyone who may benefit from decisions or activities relating to the employees' position, from anyone the employees direct or anyone on whom the employees have a direct influence while on duty.

3. Employees shall not accept, for themselves or for others, gifts or other benefits from any subordinate, other than gifts or benefits of low value, and shall not offer, directly or indirectly, gifts or other benefits to a superior, other than gifts or benefits of low value.

4. For the purposes of this article, an approximate guideline for a gift or benefit of low value is below EUR 150, including discounts. This amount also constitutes the maximum total value, per calendar year, in the case of cumulative gifts or benefits. Employees may not receive, for themselves or for others, any gift in the form of cash or any other means of payment.

5. If, for any reason, employees receive a gift and/or benefit which is not permitted by this Code, they shall inform the Corruption Prevention Officer and their superior. The notification must be made in writing without delay.

6. When a gift cannot be returned, gifts and, if possible, other benefits received outside the permitted cases shall be promptly handed over to the Corruption Prevention Officer, who shall inform the Board of Directors to determine their destination.

7. Employees shall not accept work assignments from private entities who have had a significant interest in the decisions or activities of the office to which they belong in the previous two years. For the purposes of this article, 'work assignments' refers to assignments of any kind and in any capacity



(including, but not limited to, roles as a consultant, expert, arbitrator, reviewer, agent, etc.). 'Private entities' denotes any private entity, including non-profit organisations and legal entities created within the framework of technology transfer activities. Private entities listed among public authorities constitute an exception. Such entities may be identified by their inclusion in the State consolidated financial statements which are annually identified by ISTAT and published in the Official Gazette pursuant to Article 1(3), of Italian Law No 196 of 31 December 2009.

8. Employees who, during the last three years of service, have exercised authoritative or negotiating powers on behalf of the public authorities referred to in Article 1(2) of Italian Legislative Decree No 165/2001 may not engage in employment or professional activities with the private entities affected by said authoritative or negotiating powers during their public service (*pantouflage*) in the three years following the termination of their public employment relationship.

Article 20 – Communication on participation in associations and organisations and disclosure of financial interests.

When assigned to their office, employees shall inform their superior of any membership to associations or organisations, irrespective of their confidential nature, that carry out activities that may interfere with those of their office. This obligation does not apply in case of membership to political parties or trade unions. The communication shall contain the association's key information and the reasons for the potential interference.

A potential interference exists where the goals or activities of the association or organisation relate wholly or mainly to the area of competence of the structure to which the employee is assigned.

2. When assigned to their office and any time their situation changes, employees shall inform their superior of all direct or indirect partnerships with private persons in the last three years that was paid – in any way – more than EUR 150, in accordance with the provisions of Article 6(1) of the National Code of Conduct.

3. Failure to communicate shall result in a breach of the duties of the employee and constitutes a disciplinary offence.

Article 21 – Conflict of interest

1. A conflict of interest arises when the private, personal or professional interest of the person responsible for a decision conflicts with their principle of impartiality, especially when their private interest outweighs the interests of the University. This situation may occur even in the absence of an economic advantage or other utility. A conflict of interests may therefore arise even when there is only a potential interest, i.e. without necessarily having any immediate effects, which nonetheless risks undermining correct decision making.

2. Employees, including in their capacity as a member of collegial organs, shall refrain from making decisions or carrying out activities related to their duties when there is a potential or actual conflict of interests. The conflict may result between the University and the employee's own interests, those of their spouse, cohabitants or relatives within the second degree of consanguinity or affinity. In case of members of collegial organs, the fourth degree of consanguinity or affinity applies. The conflict may concern interests of any kind.

3. Employees shall also refrain from making decisions or carrying out activities related to their duties when there is a potential or actual conflict of interests between the University and anyone with whom



employees have regular contact as well as persons or organisations with whom they or their spouse have pending, direct or indirect litigation as members of the involved university, serious enmity or significant credit or debt relationships. Without prejudice to their compliance with the rules on incompatibility, employees should also refrain from such activity in cases where there is a conflict of interests between the University and persons or organisations with whom they have a relationship as guardian, curator or agent, or in cases where they have a managerial, administrative, or directorial role in any other bodies, recognised or unrecognised associations, committees, companies or establishments.

4. In the case of a potential conflict of interest, the employee's superior shall be notified promptly, before any action is taken. This notification shall contain any information relevant to assessing the significance of the conflict. This communication shall be recorded in the University's official Register.

5. The employee's superior, having obtained the necessary information, shall decide if there is an actual conflict of interest and, if necessary, whether the employee has to refrain from certain decisions or activities. The employee's superior shall take the necessary steps and give written notice to the employee concerned.

6. The employee shall also submit a similar declaration whenever there is a change in the situation previously declared.

7. In the case of a conflict of interests involving a manager, the communication should be addressed to the Director General, who makes the relevant decision. If the conflict involves the University's Director General, the decision is made by the Rector.

8. For employees carrying out teaching and research activities, the decision lies with the Head of Department. If the conflict of interests involves the Head of the Department, the decision is made by the Rector.

9. If the conflict concerns the Rector, the decision shall be taken by the Board of Directors. Communication about the conflict must be addressed to the University's Dean who shall investigate and submit the file to the Board of Directors at the first appropriate meeting. In the event that the Board of Directors finds that there is a conflict of interest, the Dean shall replace the Rector in the activity where the conflict has been identified and adopt any necessary measures.

Article 22 – Prevention of corruption

1. For the purposes of Article 8 of the National Code of Conduct, employees must comply with the requirements of the anti-corruption legislation and the plans laid down therein and shall inform the University of any unlawful situation of which they have become aware. In order to protect their confidentiality, the employee may report directly to the Corruption Prevention Officer (CPO), providing any necessary information and relevant documentation. Reports may be made anonymously.

2. In any case, the protection of the employee who reports illicit activities is guaranteed in accordance with Italian Legislative Decree No 24 of 10 March 2023. The relevant University regulation applies to: individuals who report illicit conduct, individuals entitled to receive the reports, the procedure for submitting the reports as well as the protection of reporters, supposed wrongdoers and of all other individuals referred to in the legislation.

Article 23 – Abuse of position



1. No member of the University community is allowed to abuse the rank or authority resulting from their position in order to derive personal benefit or to require others to perform services which are not part of or instrumental to the performance of institutional activities.

Article 24 – Protection of confidentiality

Employees are required to keep news and information obtained in the performance of their duties confidential. The only exception to this requirement is in the case of a greater obligation to transparency, or in the overriding need to prevent or report misconduct or any behaviour contrary to this Code and to legislation in general.

In particular, employees undertake to:

- a. respect the confidentiality of persons or entities whose information is held by the University;
- b. not disclose, leak or share data and/or information acquired from participation in academic bodies;
- c. consult only the documents, files, databases and archives to which they have authorised access, make use of them exclusively in accordance with official duties, and allow access only to those entitled to them;
- d. prevent any data leaks by observing the University security measures.

Article 25 – Use of University resources

1. Members of the University community may use institutional economic resources in accordance with the rules and regulations. Members must be able to report their efficient and effective use and produce appropriate documentation on request.

2. The University does not allow the use of research or teaching equipment, institutional spaces, or human, material or financial resources for personal, non-institutional or unauthorised purposes. In such cases, the provisions of Article 22 of the Regulation of the University of Trieste governing the procedure for granting authorisation to academic staff to work outside the University apply.

Article 26 – Protection of the name and image of the University

1. All members of the University community are required to respect the good name of the University and to refrain from engaging in conduct that would harm its image and reputation, including through the disclosure of confidential information.

2. The use of the University's name, logo and other distinguishing signs for the dissemination of partial or complete results relating to current or past activities must be without prejudice to the University's reputation and requires explicit authorisation. The use of the name, logo and distinguishing signs of the University for non-institutional purposes or in a manner not provided for by the University's rules is prohibited.



3. Members of the university community cannot issue any public communications or statements on behalf of the University through the media outside of their institutional tasks.

Article 27 – Use of media

1. When using their social media accounts, employees must take care that their opinions or judgements about events, things, or people cannot be directly attributable to the University.

2. Without prejudice to freedom of expression and the right to criticise, employees, being part of a public institution, shall refrain from making offensive, insulting or discriminatory public statements, intervention or comment, including through the web, social media, blogs, forums or other digital platforms, even if open to a limited number of users, which may harm the prestige, decency or image of the University or of the Italian public administration in general. The right of each person to report any situation, fact or act deemed to infringe their rights to the competent authorities, including trade unions, shall remain unaffected.

3. In order to ensure confidentiality, communications relating directly or indirectly to an employee's work shall not normally take place through public conversations using digital or social media platforms, except when digital platforms and/or social media are expressly needed for institutional activities or communications.

4. When using their personal account(s), employees shall not disclose:

(a) confidential information about colleagues or third parties acquired during the performance of their duties and/or available to them for service purposes;

(b) decisions to be taken and/or measures relating to pending or terminated proceedings, unless they have been made public by the University;

(c) projects, internal correspondence, information and/or documents that are confidential or have not yet been made public by the University.

5. Employees are fully responsible for the content and messages they post through their personal accounts on social media or other digital/web platforms and, as these are potentially public spaces, they are expected to express themselves with respect to all users and commit to maintaining fair and ethical behaviour in line with their role as civil servant.

6. Without prejudice to freedom of expression and the right to criticise, where it is apparent from their personal accounts that they belong to the University, when publishing opinions, judgements or comments on facts, things or persons, employees must specify that they are only expressing their personal view.

7. Without prejudice to the merely illustrative value of the conduct referred to in paragraph 2, the University reserves the right to detail other behaviour which may damage its reputation pursuant to Article 11b(4) of Italian Presidential Decree No 62/2013.

Article 28 – Conduct in private relations



1. In private relations, employees shall not exploit or mention the position they hold in the University in order to obtain advantages or benefits and shall not engage in conduct which could damage the image or reputation of the University.

CHAPTER II – SPECIFIC BEHAVIOURAL OBLIGATIONS FOR ACADEMIC STAFF

Article 29 – Institutional duties and educational, research and management obligations

1. Without prejudice to Article 10, the academic staff referred to in Article 3(1)(a) and (c):
 - a. are required to fulfil teaching, research, and management duties as detailed in the university's legislation and regulations.
 - b. avoid any conflict of interest during exams or in other teaching or assessment roles, including as a member of a Board of Examiners.
 - c. are required to comply with the provisions of the Regulation of the University of Trieste on Research Integrity and Ethics, with particular reference to the management of financial sources, when engaged in research activities.
 - d. are required to comply with legislation and with the University's regulations when engaged in non-institutional activities.
2. Academic staff holding the role of Head of Department also exercise managerial functions within their Department, thereby assuming the relevant duties and responsibilities in accordance with their legal status.
3. The performance of non-institutional activities and activities carried out in the framework of a University convention, even if duly authorised, shall not be accepted as justification for the failure to perform institutional tasks.

CHAPTER III – SPECIFIC BEHAVIOURAL OBLIGATIONS FOR PROFESSIONAL SERVICES STAFF

Article 30 – Conduct on duty and relations with the public

1. Without prejudice to compliance with the time limits of administrative procedures, employees shall not, without valid reason, delay work or engage in conduct that would result in making their colleagues responsible for their workload or duties. All activities and decisions should comply with the time limits and quality standards found in the relevant regulations, directives and service charters.
2. Employees shall obtain permission for leave of any kind in accordance with the conditions laid down by law, regulations and collective agreements. They shall ensure their effective presence while on duty, in line with Article 55-quinquies of Italian Legislative Decree No 165 of 30 September 2001. Employees shall make proper and diligent use of the time recording systems made available.
3. Employees, in their relations with the public and internal or external users of the University shall:
 - a. maintain proper conduct and professionalism, remaining conscious of representing the University;



- b. display their institutional badge or other identification medium visibly so that they are recognisable, unless otherwise specified;
- c. work in a spirit of service, fairness, courtesy and helpfulness. When replying to correspondence, telephone calls and e-mails, they shall work in the most timely, complete and accurate manner possible, making sure replies are clear and comprehensive;
- d. structure their activities in a functional way and in line with the strategic and operational planning of the University, in the pursuit of the highest quality of service and user satisfaction;
- e. carry out their assigned tasks with the required attention, precision, and accuracy. In handling procedures, they respect chronological order unless otherwise required by service needs or priorities established by the University.
- f. respect commitments and deadlines, manage workloads correctly. This includes not sharing the outcome of their own official decisions or actions (or those of colleagues) in advance of any official dates or deadlines – outside any permitted cases;
- g. issue copies and extracts of documents in accordance with their duties, the rules on access rights, and the regulations of the University;
- h. observe professional confidentiality and the rules on the protection and processing of personal data. If a request is made for information or documents which are not accessible and protected by professional confidentiality or personal data provisions, the employee shall inform the applicant of the reasons for refusing the request. If employees are unable to deal with a request, they shall ensure that it is forwarded to the competent office, in line with internal provisions.

Article 31 – Special provisions for managers

1. Employees in managerial positions (managers), including holders of specific assignments in accordance with Article 19(6) of Italian Legislative Decree No 165 of 30 September 2001, are subject to the provisions of this Code. Within the structure they are responsible for, managers shall, in particular, observe and monitor compliance with rules on conduct, transparency and anti-corruption, the correct taking of leave and use of permits, incompatibility, and the accumulation of posts and work assignments by the employees.
2. The persons referred to in paragraph 1 shall:
 - a) perform their duties diligently and pursue the objectives assigned to them by organizing the time and resources of the structure appropriately;
 - b) ensure the fair distribution of workloads within their own structure, taking into account the skills, aptitudes and professionalism of the staff at their disposal;
 - c) assign any additional tasks on the basis of individual competences and skills and, as far as possible, in accordance with rotation criteria;
 - d) endeavour to promote a results-oriented and productivity-oriented culture within the organisation;
 - e) inform the University of any shareholdings and other financial interests which might conflict with their work within the university prior to taking up their duties; They shall also state whether their spouse, cohabitants, or relatives within the second degree of consanguinity or affinity, are engaged in political, professional or economic activities that involve frequent



contact with the structure they will be leading or who are involved in decisions or activities related to it. They shall also provide the University with information on their assets and annual income subject to personal income tax provided for by law;

- f) promote wellbeing within the structure they are responsible for by managing available resources and fostering cordial and respectful relationships among collaborators. They shall take initiative with regards to sharing information and the inclusion of all staff regardless of gender, age, and other differences in personal circumstances.
- g) contribute to the assessment of staff belonging to the structure to which they are assigned. Assessment shall be impartial and in accordance with the guidelines and specified time frames for measuring and evaluating performance;
- h) take the necessary steps in a timely manner if they become aware of an offence. In the case of an offence, they shall initiate and conclude disciplinary proceedings or report the offence to the disciplinary authority without delay. They shall also provide full cooperation on request, and submit a complaint to the judicial authority or a report to the Court of Auditors without delay, depending on the case. If they are notified of an offence by an employee, they shall take every legal precaution to protect the reporting person and ensure that the whistleblower's identity is not unduly revealed in disciplinary proceedings;
- i) prevent the spread of false information about the organisation, activity and employees as far as they can. They shall promote good practices in order to strengthen a sense of trust in the University.
- j) ensure the professional growth of employees, encouraging training opportunities and promoting development opportunities within and outside the unit for which they are responsible.

Article 32 – Contracts and other negotiating acts

1. In the negotiation and conclusion of agreements, contracts, or any other negotiated acts on behalf of the University, as well as in their execution phase, employees shall not engage the services of third-party intermediaries, nor shall they offer or promise benefits to anyone to facilitate the conclusion or execution of a contract. This paragraph shall not apply to cases in which the University has decided to engage in professional mediation.

2. Employees shall not conclude, on behalf of the University, contracts for procurement, supply, service, financing or insurance with companies with which they have concluded contracts in a private capacity or from which they have received other benefits in the previous two years, with the exception of those concluded in accordance with Article 1342 of the Italian Civil Code. Where the University concludes procurement, supply, service, financing or insurance contracts with companies with which the employee has concluded contracts in a private capacity or from which the employee has received other benefits in the previous two years, the employee shall refrain from participating in any decisions and activities relating to the contract. A written record of their abstention shall be drawn up and kept in the records of the office.

3. In the case that an employee concludes any agreements or contracts in a private capacity – with the exception of contracts concluded pursuant to Article 1342 of the Italian Civil Code – with natural or legal persons with whom they have concluded procurement, supply, service, financing or

insurance contracts on behalf of the administration in the previous two years, the employee shall inform their superior in writing.

4. If managers find themselves in the situations referred to in paragraphs 2 and 3, they must inform the Director General in writing.

5. In the case that an employee receives verbal or written complaints about the activities of their office or the work of their co-workers from natural or legal persons participating in negotiation procedures in which the University is a party, they shall immediately inform their hierarchical or functional superior. As a general rule, they should do so in writing.

CHAPTER IV – BEHAVIOURAL OBLIGATIONS FOR STUDENTS

Article 33 – Student duties

1. Students shall:

- a) care for movable or immovable property owned or held by the University in any capacity;
- b) behave in such a way as not to disrupt University activities or the University Community;
- c) behave in a manner which does not damage the University's image and is not offensive, in any context, to the dignity of other students, academic staff, technical and administrative staff, language assistants, technicians, governing bodies or to the University itself. This includes the use of questionnaires for evaluating teaching activities;
- d) behave in a manner which does not prevent or conceal the detection of disciplinary offences committed by others in any way.
- e) be responsible for the proper use of the ICT and digital tools, as defined in article 18.

2. It is the right and duty of students to participate actively in teaching and training activities. In such activities they shall adopt cooperative, fair and respectful behaviour towards teachers and any other members of the university community while also promoting and maintaining a culture of honesty, accountability and respect.

3. During examinations and final assessments, students shall not engage in disruptive behaviour or harmful and/or dishonest actions.

4. Without prejudice to criminal liability, the alteration, modification, counterfeiting, or falsification of any university documentation constitutes a disciplinary offence, as do any lies or false declarations on a student's own academic records or on the records of a fellow student.

5. Plagiarism, the copying of any work, and any behaviour that may undermine the integrity and equity of an evaluation process, preventing a proper and impartial assessment of the work, are contrary to the principles of this Code.

TITLE IV – CODE BREACHES, MONITORING AND IMPLEMENTATION



Article 34 – Code breaches

1. Members of the University community are required to read and comply with this Code and to take care, in relation to their role and responsibility, to prevent conduct that constitutes a breach of the rules contained in this Code.
2. Any person who considers that they have suffered injury or damage or has knowledge of the non-compliance with the Code may send a written report to the person in charge of their unit or, depending on the specific case, to the office in charge of disciplinary actions, the Confidential Counsellor, the University Ombudsman, or the Rector. If the person to whom the report is addressed is not able to proceed with the complaint, the report will still be transmitted to the competent body.
3. Reports shall be examined impartially and in a timely manner, safeguarding the dignity and of the persons concerned while also ensuring confidentiality, transparency and the adversarial principle throughout proceedings. The protection of the reporter against retaliation is guaranteed, as are the traceability and proportionality of the actions taken.
4. For reports of wrongdoing covered by the integrated plan of activities and organisation (PIAO), reference is made to Article 22 of this Code.

Article 35 – Breach of ethical requirements

1. Without prejudice to disciplinary, criminal, administrative and accounting responsibilities, breaches of the ethical principles of the University community (as referred to in Title II) shall entail the penalties detailed in paragraph 6 of this Article.
2. In cases where breaches of the Code of Ethics do not constitute a disciplinary offence, the Rector shall propose a response which the Academic Senate shall subsequently decide upon. Any response to a breach shall be made in accordance with the adversarial principle.
3. In these cases, the Rector shall notify the member of the University community responsible for the infringement in writing within 30 days from receiving a full report, specifying therein the date of the meeting. This communication shall be made using any instrument with which correct receipt can be verified, e.g., recorded delivery. There must be at least 10 days between the notification of the charge and the meeting.
4. The person concerned is entitled to assistance from their own representative or by a hired counsel and may lodge pleadings.
5. The Academic Senate shall decide on the proposal made by the Rector at the end of the adversarial procedure with the interested party within 180 days of contesting the breach of ethical requirements.
6. In the case of a breach in the Code of Ethics, proportional penalties shall be applied. Penalties will also be progressive and escalated as necessary. They may go from a written reprimand recorded in the personal file of the person concerned, to the suspension from official academic positions for one to three years in the event of conduct which, taking into account the circumstances of the case, constitutes a significant or repeated breach of the Code.



Article 36 – Breach of behavioural obligations by professional services staff

1. Without prejudice to cases which also constitute a criminal, civil, administrative, and accounting liability, a breach in the provisions contained in Title III of this Code, in the national Code of Conduct, and in the duties and obligations established by the integrated plan of activities and organisation (PIAO) shall lead to disciplinary action for all professional services staff. The nature of the disciplinary action is established at the end of the disciplinary proceeding.

2. The applicable penalties are those provided for by law and collective agreements. Any penalties shall be proportional and applied progressively when escalation is necessary. In order to determine the type and extent of a given disciplinary penalty, reference should be made to the information contained in Article 16(2) of the National Code of Conduct.

Article 37 – Breach of behavioural obligations by academic staff

1. Without prejudice to cases which also constitute a criminal, civil, administrative and accounting liability, a breach in the general or specific provisions contained in Title III of this Code and in the National Code of Conduct by academic staff of the University constitutes misconduct and shall lead to disciplinary action. The nature of this disciplinary action is established at the end of the disciplinary proceeding initiated by the Rector.

2. Disciplinary proceedings are conducted in accordance with: Article 10 of Italian Law No 240 of 30 December 2010; Article 23 of the University's Statute; the Rules for the functioning of the Disciplinary Board; the provisions for the conduct of disciplinary proceedings against university professors and researchers.

If the Rector breaches this Code, the functions officially assigned to them shall be the responsibility of the University Dean.

Article 38 – Breaches of the obligations of conduct by persons holding a collaboration contract or in the context of contracts for the supply of goods, services and works

1. Within the limits of the law, an appropriate termination clause or other proportionate penalty shall be included in all contracts, letters of assignment or in any appropriate supplementary agreement and will be applicable in the event of a breach of the obligations detailed in this Code.

Article 39 – Breach of behavioural obligations by students

1. Without prejudice to cases which also constitute a criminal and/or civil liability, failure to comply with the provisions of Title III of this Code shall lead to possible disciplinary action. The nature of this disciplinary action is established at the end of the disciplinary proceedings, as detailed in the Regulations of the University on the academic career of students and their respective legal systems.

2. Unless otherwise provided for by law, the disciplinary measures that may be applied are as follows:
a) warning;



- b) temporary disqualification from one or more educational activities;
- c) exclusion from one or more examinations or any other forms of assessment for a period of up to three months;
- d) temporary suspension from the University for a maximum of one year.

3. The application of disciplinary measures must be reasonable, fair, proportionate and suitable for the infringement, the course of events, and the assessment of the evidence.

Article 40 – Supervision, monitoring and training activities

- 1. Without prejudice to the obligation to report any infringement, the Rector, the Director General, the managers and all the heads of unit shall supervise the application of the Code.
- 2. The University shall organise training initiatives for all staff on ethics and legality, with particular reference to the content of the National Code of Conduct and this Code.

Article 41 – Implementation and dissemination

- 1. Members of the University community are required to read and comply with this Code and to take care, in relation to their role and responsibility, to prevent conduct that constitutes a breach of the rules contained in this Code.
- 2. The Code is published on the University website, together with the National Code of Conduct.
- 3. The Corruption Prevention Officer is responsible for ensuring awareness of the Code of Conduct within the University.
- 4. Upon the signing of an employment contract the University shall provide new recruits with a copy of this Code for them to sign. Employees who did not receive and sign a copy of the Code when hired, shall do so upon assignment of a new role.

Please remember that only the Italian version of this document is legally binding.