

The background features a large, light blue watermark of the AIC Forum logo. The logo is circular and contains the text 'CHAMBERS OF COMMERCE' at the top, 'FORUM OF THE ADRIATIC AND IONIAN' at the bottom, and 'AIC FORUM' in the center. A stylized wave graphic is positioned above the central text.

# Code of Conduct

## **General Provisions**

(art. 1)

1. This Code of Conduct, hereinafter referred to as the “Code”, defines the minimum duties of diligence, loyalty, impartiality and proper behaviour that employees of the Forum of the Chambers of Commerce of the Adriatic and Ionian Area (hereinafter referred to as the “Association”) are required to observe.

## **Scope of Application**

(art. 2)

1. This Code applies to all employees of the Association, whether on permanent or fixed-term contracts, as well as interns and, where compatible, all collaborators or consultants, regardless of the type of contract or assignment. It also applies to collaborators of companies supplying goods or services or carrying out works in favour of the Association.

2. To this end, appointment documents and contracts relating to collaborations, consultancy or services must include specific clauses providing for termination or withdrawal in the event of a breach of the obligations established under this Code.

3. The conduct obligations set out in this Code of Conduct also apply, where compatible, to those performing representation, management or supervisory functions within the Association, including holders of offices provided for in the Statute.

## **General Principles**

(art. 3)

1. Employees shall conduct themselves in accordance with the principles of good performance and impartiality in carrying out the Association’s activities, and shall perform their duties in compliance with the applicable legislation, without abusing their position or the powers entrusted to them.

2. Employees shall uphold the principles of integrity, fairness, good faith, proportionality, objectivity, transparency, equity and reasonableness; they must act independently and impartially and shall abstain in the event of conflicts of interest.

3. Employees shall not use, for private purposes, any information acquired in the course of their duties, and shall avoid situations or behaviours that may hinder the proper performance of their tasks or harm the interests or reputation of the Association.

4. Employees shall perform their tasks in a manner that ensures that activities falling within

the scope of the Statute are carried out with the highest level of efficiency, effectiveness and cost-effectiveness. Resource management must follow a cost-containment approach that does not compromise the quality of results.

5. In dealings with beneficiaries of the Association's activities, employees shall ensure equal treatment under equal conditions and shall refrain from arbitrary actions that may negatively affect beneficiaries or result in discrimination based on sex, nationality, ethnic origin, genetic characteristics, language, religion or belief, political or personal opinions, membership of a national minority, disability, social or health conditions, age, sexual orientation, or any other factor.

6. Employees shall demonstrate maximum cooperation and availability in relations with public administrations and other stakeholders, ensuring the exchange and transmission of information and data, including electronically, in compliance with applicable legislation.

### **Gifts, Compensation and Other Benefits**

(art. 4)

1. Employees shall not request or solicit, for themselves or for others, any gifts or other benefits.

2. Employees shall not accept, for themselves or for others, gifts or other benefits, except for customary items of modest value offered occasionally within ordinary courtesy practices or international customs. In any case, irrespective of whether the conduct constitutes a criminal offence, employees shall not request, for themselves or for others, gifts or benefits—even of modest value—as compensation for performing or having performed an official act, from individuals who may benefit from decisions or activities related to their duties, nor from individuals towards whom they are or will be required to carry out activities or exercise powers connected with their office.

3. Employees shall not accept, for themselves or for others, gifts or other benefits—directly or indirectly—from their subordinates, except for items of modest value. Employees shall likewise not offer gifts or other benefits—directly or indirectly—to their superiors, except for items of modest value.

4. Any gifts or other benefits received outside the permitted cases must be immediately handed over by the employee concerned to the Association, either for return to the sender or for institutional use.

5. For the purposes of this Article, gifts or other benefits of modest value mean items not exceeding, as a general guideline, €100 in value, including discounts.

6. Employees shall not accept collaboration assignments from private entities that have, or have had in the previous two years, a significant economic interest in decisions or activities related to the employee's office.

7. In order to safeguard the prestige and impartiality of the Association, the Head of the Secretariat shall monitor the correct application of this Article.

## **Participation in Associations and Organisations**

(art. 5)

1. In compliance with current legislation on the right of association, employees shall promptly inform the Secretary General of their membership or affiliation to associations or organisations—whether or not of a confidential nature—whose areas of interest may interfere with the activities of the Association. This paragraph does not apply to membership in political parties or trade unions.
2. Employees shall not coerce other employees to join associations or organisations, nor exert pressure for such purposes, including by promising advantages or suggesting career disadvantages.

## **Disclosure of Financial Interests and Conflicts of Interest**

(art. 6)

1. Without prejudice to the transparency obligations established by law or regulations, upon assignment to an office, employees shall provide written disclosure to the Secretary General of all remunerated collaborations—direct or indirect—with private entities held in the previous three years, specifying:
  - a) whether the employee, their spouse or partner, or relatives up to the second degree, maintain ongoing financial relationships with the entity with whom the collaboration took place;
  - b) whether such relationships occurred or occur with entities that have interests in activities or decisions related to the employee's office, limited to matters assigned to them.
2. Employees shall refrain from making decisions or carrying out activities related to their duties in situations involving actual or potential conflicts of interest, including those arising from personal interests or those of their spouse or partner, relatives or relations up to the second degree. Conflicts may concern interests of any nature, including non-financial ones, such as those arising from political, trade union, or hierarchical pressures.

## **Obligation to Abstain**

(art. 7)

1. Employees shall abstain from participating in decisions or activities that may involve their own interests or those of their spouse or partner, relatives or relations up to the second degree, or persons with whom they maintain habitual relations. They shall also abstain where interests

involve individuals or organisations with whom the employee or their spouse has pending legal disputes, a serious hostility, significant credit or debt relationships, or cases in which the employee acts as guardian, curator, proxy, or representative. Abstention is also required with respect to entities, associations (including unrecognised ones), committees, companies, or establishments in which the employee holds roles as administrator, manager, or director. Employees shall abstain in any other circumstance where substantial reasons of appropriateness exist. The decision on abstention rests with the Secretary General.

### **Prevention of Corruption**

(art. 8)

1. Employees shall comply with all measures aimed at preventing unlawful conduct within the Association. In particular, employees shall observe the requirements set out in the Anti-Corruption Plan and cooperate with the Secretary General. Without prejudice to the obligation to report to judicial authorities, employees shall promptly inform their hierarchical superior of any instances of wrongdoing within the Association of which they become aware.

### **Transparency and Traceability**

(art. 9)

1. Employees shall ensure compliance with transparency obligations established under current legislation, where applicable, and shall provide full cooperation in preparing, retrieving, and transmitting data to be published on the institutional website
2. Traceability of decision-making processes undertaken by employees must always be guaranteed through adequate documentation, ensuring that such processes can be replicated at any time.

### **Conduct in Private Dealings**

(art. 10)

1. In private dealings, including non-work-related interactions with public officials acting in an official capacity, employees shall not exploit or refer to their position within the Association to obtain benefits to which they are not entitled. They shall also refrain from any conduct that may harm the image of the Association.

### **Conduct in Service**

(art. 11)

1. Employees shall not, unless justified by valid reasons, delay activities or adopt behaviours

that result in shifting onto other colleagues the execution of tasks or decisions falling within their own responsibilities.

2. Employees shall use leave and absence entitlements, whatever their nature, in compliance with the conditions established by law, regulations, and collective agreements.

3. Employees shall use office materials, equipment, and telematic or telephone services provided for work purposes in accordance with the restrictions established by the Association.

## **Energy Saving and the Efficient and Rational Use of Energy**

(Art. 12)

1. In line with Regulation (EU) 2022/1369 of 5 August 2022, employees shall adopt, on a daily basis, behaviours aimed at improving energy efficiency and reducing consumption, avoiding waste and promoting the conscious and rational use of the Association's tools and resources.

## **Use of Information Technology.**

(Art. 13)

1. The Association, through the Secretary General, may carry out the necessary checks and adopt any measures required to ensure the security and protection of IT systems, information, and data. Such checks shall be conducted in compliance with European legislation on personal data protection.

2. Institutional accounts shall be used solely for purposes related to work activities or closely connected to them and must not compromise the security or reputation of the Association. As a rule, the use of personal email accounts for work-related activities or communications is to be avoided, except in cases of force majeure where the employee, for any reason, cannot access their institutional account.

3. Employees are responsible for the content of the messages they send. Employees must comply with the signature formats defined by the Association for service-related emails. Each outgoing message must allow identification of the sender and include an institutional contact address.

4. Employees may use the Association's IT tools to deal with personal matters without leaving the workplace, provided such use is limited to short periods and does not prejudice institutional duties.

5. It is prohibited to send emails—internally or externally—that are offensive, discriminatory, or that may in any way give rise to liability for the Association.

## **Use of Information Media and Social Media**

(Art. 14)

1. When using their personal social media accounts, employees shall exercise all due caution to ensure that their opinions or statements regarding events, matters or individuals cannot be directly attributed to the Association.
2. Employees must refrain from any intervention or comment that may damage the prestige, decorum, or image of the Association.
3. In order to ensure the necessary level of confidentiality, communications directly or indirectly related to service activities shall not, as a rule, be conducted through public conversations on digital platforms or social media. This limitation does not apply to activities or communications for which the use of social media serves an institutional purpose.
4. The Association may adopt a social media policy, which may specify—based on hierarchical level and employee responsibilities—the types of conduct that could harm the reputation of the Association.
5. Employees shall not disclose or disseminate, for purposes unrelated to their employment relationship with the Association, documents (including draft documents), images, or information to which they have access.

### **Rapporti con il pubblico**

(art. 15)

1. Employees who interact with the public shall ensure that they are identifiable by visibly displaying their badge or an identification plate at the entrance of their assigned office, unless otherwise required for service reasons, including considerations related to employee safety. They shall act with a spirit of service, correctness, courtesy, and helpfulness. When responding to correspondence, telephone calls, or emails, they shall provide complete and accurate information and, in any case, behave in a manner oriented towards user satisfaction. If the employee is not competent for the matter or position concerned, they shall refer the individual to the competent employee within the Association. In performing tasks and handling procedures, employees shall observe chronological order, unless service needs or different priorities established by the Association require otherwise, and shall not refuse services they are required to provide on the basis of generic justifications.
2. Employees shall refrain from making public statements that are offensive towards the Association or that may damage its prestige, decorum, or image, or that of the associated Chambers.
3. Employees shall observe professional secrecy and legislation on personal data protection. When orally requested to provide information, records, or documents that are not accessible because they are protected by professional secrecy or data protection rules, they shall inform the requester of the reasons preventing their release.

## Specific Provisions for Holders of Managerial Positions

(art. 16)

1. Without prejudice to the application of all other provisions of this Code, the rules set out in this Article apply to individuals who hold managerial functions, as well as to those responsible for coordination roles.
2. The manager shall diligently perform the functions assigned under their appointment, pursue the objectives set, and adopt an organisational conduct appropriate to the fulfilment of their duties.
3. Before assuming their functions, the manager shall submit the declarations concerning inconfiribilità (ineligibility) and incompatibilità (incompatibility) required under Article 20, paragraph 1 of D.Lgs.8/4/2013 n.39, insofar as applicable.
4. The manager shall act with loyalty and transparency and shall maintain exemplary conduct in terms of integrity, impartiality, good faith, fairness, equal treatment, equity, inclusion and reasonableness. They shall act impartially in dealings with colleagues, collaborators and beneficiaries of the Association's activities. The manager shall also ensure that the resources assigned are used solely for institutional purposes and never for personal needs.
5. The manager shall promote the professional development of collaborators, encouraging training opportunities and fostering internal and external development prospects within and beyond the Association..
6. The manager shall, insofar as resources allow, foster organisational well-being within the Association by promoting cordial and respectful relationships among collaborators, as well as relations—internal and external to the structure—based on mutual trust and loyal cooperation. The manager shall adopt initiatives aimed at facilitating the circulation of information, inclusion, and the valorisation of differences in gender, age and personal circumstances.
7. The manager shall ensure a fair distribution of workload, taking into account the skills, aptitudes and professional competencies of the personnel under their responsibility.
8. The manager shall promptly adopt the necessary measures upon becoming aware of an unlawful act, initiate and conclude disciplinary proceedings when competent, and promptly report to the judicial authorities where required. If the manager receives a report of wrongdoing from an employee, they shall take all legally required steps to protect the whistleblower and ensure that the whistleblower's identity is not improperly disclosed during disciplinary proceedings.
9. The manager shall, to the extent possible, prevent the spread of false or misleading information concerning the Association, its activities or its staff. They shall also promote the dissemination of good practices and positive examples to strengthen trust in the Association.

## Contracts and Other Negotiated Acts

(art. 17)

1. In concluding agreements or negotiated acts and in signing contracts on behalf of the Association, as well as during their execution, employees shall not resort to third-party mediation, nor shall they give or promise any benefits to anyone as compensation for facilitating, or having facilitated, the conclusion or execution of a contract. This paragraph does not apply where the Association has expressly decided to engage professional intermediaries.

2. Employees shall not conclude, on behalf of the Association, contracts for works, supplies, services, financing or insurance with companies with which they have entered into private contracts or from which they have received benefits in the previous two years, except for those concluded pursuant to Article 1342 of the Italian Civil Code. Should the Association enter into such contracts with companies from which the employee has received benefits or concluded private contracts within the previous two years, the employee shall abstain from participating in the related decisions and activities, drafting a written statement of abstention to be kept on file.

3. Employees who conclude agreements or contracts in a private capacity—except for those concluded under Article 1342 of the Italian Civil Code—with individuals or entities with whom they have concluded contracts on behalf of the Association (for works, supplies, services, financing or insurance) in the previous two years, must inform the Secretary General in writing.

4. Employees who receive oral or written complaints from individuals or entities participating in negotiated procedures involving the Association, regarding the conduct of the office or of its staff, shall immediately inform the Secretary General, preferably in writing.

### **Supervision, Monitoring and Training Activities**

(art. 18)

1. The Secretary General shall supervise the application of this Code.

2. The Secretary General shall ensure the updating of the Association's Code of Conduct; examine reports of violations; collect information on confirmed unlawful conduct and related sanctions; promote awareness of the Code within the Association; and ensure its publication on the institutional website.

3. Training activities shall be provided to staff on transparency, integrity and ethical conduct, enabling them to acquire full knowledge of the Code's content, as well as systematic and annual updates on applicable measures and regulations in these areas.

### **Liability Arising from Violation of the Code**

(art. 19)

1. Violation of the obligations set out in this Code constitutes conduct contrary to official duties. Without prejudice to cases where such violations also give rise to criminal, civil, administrative or accounting liability, they also constitute grounds for disciplinary action, determined upon completion of disciplinary proceedings and in compliance with the principles of gradualness and proportionality of sanctions.

2. For the purpose of determining the type and extent of the disciplinary sanction to be applied, each violation shall be assessed on a case-by-case basis, taking into account the seriousness of the conduct and the degree of harm—including reputational harm—caused to the prestige and decorum of the Association. Applicable sanctions are those provided for by law, regulations and collective agreements.
3. Dismissal without notice remains applicable in cases already provided for by law, regulations and collective agreements.
4. All other obligations and corresponding cases of disciplinary liability established by statutory, regulatory or contractual provisions remain unaffected.

### **Final Provisions**

(art. 20)

1. The Association shall ensure the widest possible dissemination of this Code by publishing it on its institutional website and sending it by email to all employees and to holders of consultancy or collaboration contracts of any kind, including trainees and collaborators—also of external service providers—working on behalf of the Association. Upon signing their employment contract or, where not applicable, upon receiving their appointment, newly hired personnel—under any type of arrangement—shall be provided with a copy of the Code of Conduct, which they must sign as acknowledgment.