

Code of Ethics and Conduct by SAFE Foundation

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1. Mission of Safe Foundation

The SAFE Foundation complies with the principles and legal framework of participatory foundations and is a non-profit organization.

The Foundation, which aims to promote national and international activities in the fields of security, defence, peace and stability, freedom and fundamental rights and pursues exclusively social solidarity purposes of general interest; In implementing this purpose, it will be able to carry out the following activities:

- support and advice to states and public bodies for the development of common regulatory and organisational models (especially with regard to the dissemination of the European Union acquis), as well as for the definition of regulatory reform strategies and for the preparation, implementation and reporting of European projects in support of the aforementioned areas of intervention;
- preparation and implementation of programmes to strengthen the stability of democratic institutions, legality and security;
- preparation and implementation of training, awareness and updating programs for public and private actors operating in the aforementioned areas of intervention, as well as for the communities concerned;
- preparation and implementation of training programmes for police forces, as well as for the development of common procedures for sharing information and suppressing international criminal and terrorist activities;
- preparation and implementation of social innovation activities in Italy or other countries of the European Union, in collaboration with public and private bodies;
- carrying out social, economic (among others, evaluation studies) and legal studies and analyses;
- support to public and private bodies for the definition of priorities, preparation, implementation and reporting of projects financed by public or private funds

2. Purpose and scope

With this Code of Ethics, the SAFE Foundation intends to explain the set of values and general principles of conduct and the rules that must govern the action of collaborators and all those who work in the name and/or on behalf of the SAFE Foundation, in any capacity without distinction or exception.

The observance by all collaborators of the indications of the Code of Ethics, each within the scope of their responsibilities and functions, contributes to the achievement of the objectives of the SAFE Foundation and is essential for its proper functioning, reliability and reputation. It is the duty of all collaborators to know the content of the Code of Ethics, understand its meaning, actively contribute to its implementation and possibly take steps to ask for clarification regarding it.

"Recipients for information" are also all those who for various reasons are potentially interested in compliance with the Code of Ethics. The strength of this code lies in the

awareness of the value of these rules and in the sharing by its collaborators of the constitutional ethical principles of diligence, loyalty, impartiality and care for the public interest.

The SAFE Foundation undertakes to use the appropriate tools to disseminate this Code of Ethics and to implement the appropriate initiatives aimed at explaining its content.

3. General principles of conduct

The SAFE Foundation chooses the methods and tools with which it plans and implements the objectives established within the Strategic Plan established annually by the SAFE Foundation Assembly. The Foundation's action is carried out in full compliance with the principles of integrity, fairness, good faith, proportionality, objectivity, transparency, fairness and reasonableness, taking into account any new circumstances, changing conditions as well as the evolution of demands and needs that arise in Italian society and in the international context, and acting in a position of independence and impartiality.

The SAFE Foundation has as its essential principle the respect of laws and regulations in force and does not have relations with those who do not intend to adopt and respect this principle. The violation may in no case be justified by the realization of an interest of the SAFE Foundation or by the achievement of an advantage for the same.

The SAFE Foundation pays particular attention to the creation and management of environments and workplaces that are suitable from the point of view of the safety and health of employees and all those who work in the name and/or on behalf of the SAFE Foundation in any capacity without distinction or exception, in accordance with national and international legislation on the subject.

The SAFE Foundation is committed to ensuring that every transaction and transaction is legitimate, authorised, correctly recorded and that the decision-making, authorisation and execution process can be verified. For each operation there must be adequate documentary support in order to be able to proceed, at any time, to carry out checks that certify the characteristics and reasons for the operation and identify who authorised, carried out, recorded or verified the operation itself. All collaborators must ensure the utmost truthfulness, transparency and completeness of the information, both verbal and documentary (where possible in digital format to reduce the environmental impact of the Foundation's activities), produced as part of the performance of the activities, each for the part of their competence and responsibility.

Any operation that may involve the slightest possibility of involvement of the SAFE Foundation in matters of receiving stolen goods, money laundering, use of goods or money of illegal origin as well as tax evasion is strictly prohibited. Financial flows must be managed by ensuring the complete traceability of transactions, keeping adequate documentation and always within the limits of the responsibilities assigned to each person.

4. Conflicts of interest

All collaborators precautionarily refrain from making decisions or carrying out activities related to their functions in situations of conflict of interest (i.e. situations in which an employee is in a position that could make it difficult to carry out his or her task or provide his or her activity, in the interest of the SAFE Foundation, with correctness, objectivity and effectiveness). Collaborators who do not comply with the provisions of this article incur disciplinary liability, except for greater responsibilities provided for by law.

5. Prevention of corruption

Collaborators must maintain conduct that is fully compliant with the legislation on the prevention of corruption, without prejudice to the obligation to report to the judicial authorities in the event of a lack of transparency in any illegal situations of which they have become aware, to be reported first to their superior. The SAFE Foundation guarantees adequate protection for those who report corrupt acts.

6. Confidentiality

To the extent necessary for the stipulation or execution of the activities in which they are involved, collaborators undertake to keep confidential and not to disseminate, disclose or transmit company information and technical-industrial experience, including commercial information, including those of third parties, learned as part of any SAFE Foundation activity in which they have been directly or indirectly involved and of which they have become aware. All information that is not in the public domain relating to the SAFE Foundation and the activities carried out in the name and on behalf of the Foundation, or of other subjects with whom the SAFE Foundation collaborates, of which the collaborator is aware by reason of his or her functions or by virtue of the relationship with the SAFE Foundation, must be considered confidential and be used only for the performance of his or her work.

In particular, collaborators are required:

- to use the aforementioned information only and only for the established purposes and not to use it otherwise; and
- not to copy or reproduce such information or bring it to the attention of third parties without the written permission of SAFE Foundation; and
- to transmit such information only to those who have the need to know it due to the specific tasks assigned to them and related to the pursuit of the purposes established by the parties; and
- to protect and retain such information with at least the same degree of diligence and vigilance with which its own information is protected; and
- to respect the level of confidentiality and classification attributed to any information transmitted, complying with all the rules and regulations in force relating to the exchange and processing of classified information.

In the event of disclosure of Classified Information, it is understood that:

- the disclosure of Classified Information from one employee to another must be carried out in compliance with the limits and procedures imposed by the Government that gave rise to the Information;
- each collaborator undertakes to observe the aforementioned security procedures, as communicated by the transmitting Party and established by (and on behalf of) the relevant Government regarding:
 - disclosure of Classified Information;
 - receipt of Classified Information;
 - protection, use and management of Classified Information received from other Parties;
- any Classified Information shall be identified as such by the transmitting Party (regardless of the means of communication) at the time of its disclosure.

The exchange of Classified Information is regulated by the specific legislation of the State to which the Authority from which the information comes belongs or which forms the document, the act or which first acquires information or which acquires documents, acts, news or things from abroad, to which it affixes a classification of secrecy.

On the contrary, information is not subject to the confidentiality obligations referred to above, which:

- are public at the time of communication or become public subsequently, provided that they do not violate this Code of Ethics;
- are already in the possession of the receiving Party, provided that the receiving Party gives immediate written notice to the transmitting Party;
- have been lawfully communicated to the Receiving Party by third parties, without restriction in relation to their use;
- must be made public pursuant to a mandatory rule of law or by order of a Public Authority, provided that the Party immediately gives written notice to the other Party;
- were not indicated as confidential at the time of their transmission.

Fondazione SAFE guarantees, in accordance with the provisions of the law, the confidentiality of personal data and information in its possession and prepares internal regulations, information systems and suitable procedures aimed at ensuring the processing, internal management and external communication of such information, in compliance with national and European legislation.

7. Image protection

In the workplace and outside, collaborators must not engage in conduct that may prejudice the interests of the SAFE Foundation or damage its image. Collaborators must base their conduct on appropriate standards of conduct, compatible with the tasks and functions performed, and with the protection of the image of the SAFE Foundation.

8. Giveaways and Gifts

In order to ensure the proper functioning of the SAFE Foundation, collaborators refrain from accepting or offering gifts, gifts and other forms of benefits that do not have a symbolic value (or that do not fall within the normal courtesy of relationships) and that could be interpreted as aimed at obtaining or receiving preferential treatment or influencing, even indirectly, the decisions of the interlocutors. In addition, it is in any case forbidden to accept monetary gifts of any size. In the event that collaborators receive gifts of a value that is not easily estimated or of not modest value, or of modest value but repeatedly during the year, they must promptly notify their direct Supervisor, who will assess the situation in compliance with the provisions of this document.

9. Assets and computer systems

Each collaborator is required to use the assets and IT systems entrusted to him or her by operating diligently, ensuring responsible behavior and protection of the assets themselves, using them appropriately and in accordance with the interest of the SAFE Foundation, preventing third parties from misusing them. Each employee is responsible for the correct use of the resources assigned to him as well as the access codes to the systems themselves, in compliance with current regulations.

10. Relations with Collaborators

The high professionalism, competence and reliability of the collaborators and all those who work in the name and/or on behalf of the SAFE Foundation are a fundamental factor for the success of the SAFE Foundation. People are identified on the basis of their experience, aptitude and skills, according to objective evaluation criteria.

The SAFE Foundation ensures the implementation of the principle of equal opportunities and equal treatment of men and women in matters of employment and occupation. To this end, the SAFE Foundation internally promotes provisions aimed at implementing the principle of equal treatment with regard to access to employment, vocational promotion and training, working conditions, including remuneration and occupational social security schemes.

The SAFE Foundation guarantees a dignified and respectful work environment for all, where everyone is valued with respect to skills and *performance*. The SAFE Foundation guarantees working conditions that respect individual dignity, in safe and healthy work environments, according to the regulations on the protection of health and safety in the

workplace. The SAFE Foundation is also committed to spreading and consolidating a culture of safety, developing awareness of risks, promoting responsible behaviour by all employees and working to preserve, especially with preventive actions, the health and safety of employees. SAFE Foundation prevents any kind of violence, harassment or unwanted behavior that violates the dignity of the person.

11. Relations with external users

Collaborators are invited to establish a relationship with external users based on fairness and courtesy, which takes into account the peculiarities of each interlocutor so as to avoid behavior that could be interpreted as intolerant or intolerant or discriminatory.

12. Partner Relationships

As part of its activities and in the pursuit of its strategic objectives, the SAFE Foundation establishes collaborative relationships and alliances with international, national and local, public or private partners. It also establishes relationships and commitments with different funders or public or private donors. The choice of partners is based on criteria of sharing and acceptance of the principles, norms and mission of the SAFE Foundation. Donors who intend to finance projects or actions promoted by the SAFE Foundation are required to respect human rights, workers' rights and environmental protection.

13. Respect for the environment

As part of its activities, the SAFE Foundation promotes projects that aim to protect the environment, it also complies with the requirements on environmental protection, waste production and disposal and pollution, respecting and implementing all the laws and regulations in force on the subject. In all the activities implemented, the SAFE Foundation aims to reduce the environmental impact, limiting the use of paper documents and preferring where possible remote video-conferences or support from local staff to reduce *the environmental footprint of the activities*.

14. Liability and disciplinary violations

Without prejudice to the sanctions provided for by the regulatory provisions for violations of the provisions contained therein, SAFE Foundation establishes the sanctions it will adopt against collaborators who have behaved contrary to the indications of the Code of Ethics, to be imposed according to the criterion of proportionality, based on the seriousness and intentionality of the infringement committed, also taking into account any repetition, of the non-fulfilment and/or violations committed. For collaborators, compliance with the Code of Ethics is an integral part of the conditions governing employment relations with the Foundation and, in the cases provided for by law, violation of this Code of Ethics may lead to the termination of existing contracts with them for just cause, or for non-compliance by the above-mentioned subjects.

15. Final provisions

The SAFE Foundation undertakes to make the Code of Ethics known to its collaborators through specific communication activities according to the means and procedures deemed most suitable. For anything not regulated in this Code of Ethics, reference is made to the current regulatory and contractual provisions of the law.