



MUSEO  
NAZIONALE  
DEL CINEMA  
TORINO

ORGANISATION, MANAGEMENT AND CONTROL MODEL PURSUANT  
TO ITALIAN LEGISLATIVE DECREE 08 JUNE 2001, No. 231

**CODE OF  
ETHICS**

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## **Preamble**

Since its establishment, the 'Museo Nazionale del Cinema - Fondazione Maria Adriana Prolo - Archivi di Cinema, Fotografia ed Immagine' Foundation (hereinafter also referred to as 'the Body', 'the Foundation' or 'the Museum') has carried out and managed the many activities through which it pursues its mission at local, national and international level with the utmost fairness, ethical conduct and transparency.

Such a way of operating is also pursued by adopting the most appropriate prevention measures and assessment tools to guarantee strict compliance with the laws and regulations in force in the various contexts in which the Museum operates at all levels - decision-making as well as operational - and is based on the conviction that integrity and legality are the foundations of a successful activity for the benefit of the community and, at the same time, enable the Museum's value and prestige to be preserved and implemented.

In order to implement its intentions, in addition to adopting the present Code of Ethics (hereinafter also referred to as 'the Code'), the Museum has, for example, decided to adopt an Organisational, Management and Control Model in accordance with Italian Legislative Decree No. 231, dated 8 June 2001 (hereinafter also referred to as 'the 231 Model'), of which the present Code is an integral part; furthermore, the Museum, where deemed necessary, has complied with the specific legislation on 'Transparency' (Italian Legislative Decree No. 14 March 2013, No. 33).

## **The Museum Code of Ethics**

This Code is the document approved by the Museum's Management Committee, which goes beyond the legal provisions of Italian Legislative Decree No. 231/2001 and first and foremost fulfils the task of identifying the founding values the organisation intends to adopt and implement internally and in relations with third parties. Such values include, in particular:

- legality;
- fairness and equality;
- impartiality and non-discrimination;
- prevention of conflicts of interest;
- integrity and professional integrity;
- transparency and diligence;
- confidentiality and protection of personal data;
- promoting culture;
- protection of copyright;
- occupational health and safety;
- environmental protection.

The Code is also intended to set out the general guiding conduct principles regarding the activities of all those who work for - or have relations with - the Museum, and who, therefore, are expected to observe and adapt their conduct to the principles and values set out above.

It is therefore the duty of each of the Addressees of the Code, as better identified below, within the scope of their assigned responsibilities and according to the type of relationship that binds them to the Museum, to know and fully apply the contents of this Code of Ethics. Furthermore, all internal Addressees of the Museum have the responsibility to adequately disseminate the values and principles set forth in the Code and to strengthen trust, cohesion and team spirit; the dedication and professionalism of employees and collaborators are decisive values and conditions for achieving the aims of the organisation.

Under no circumstance may the conviction of acting to the advantage or in the interest of the Museum justify, even in part, any behaviour contrary to the values and principles set forth herein.

## I. GENERAL SECTION

### 1. Addressees of the Code

The Code functions as a 'Values Charter' and compendium of general principles of conduct, in terms of objective and subjective scope and prescriptive detail (general and abstract) which is different - and broader - than the one defined by 231 Model. In this regard, the Addressees of the Code (hereinafter also referred to as 'the Addressees') are:

- the Addressees of 231 Model, i.e.:
  - persons who have an employment relationship with the Museum;
  - Chairperson and other members of the Museum's Management Committee;
  - Director of the Museum;
  - temporary or posted Museum workers, as well as self-employed collaborators, who are effectively and structurally part of the organisation of the Body;
- any other party to a contract with the Museum with the exception of the public:
  - Board of Auditors and members of the Supervisory Body established pursuant to Italian Legislative Decree No. 231/2001;
  - para-subordinate collaborators who are not structurally included in the organisation and work outside the Museum's workplaces
  - self-employed workers, suppliers, etc.

### 2. Sanctions

The Museum requires and expects that the values and standards of behaviour defined herein be shared and respected by all those to whom this code is addressed.

The observance of the Museum's Code of Ethics is to be understood as an integral part of the contractual obligations of each of the Addressees, in particular, with regard to employees, as an expression of employer regulations regarding giving instructions for the execution and discipline of work pursuant to Article 2104 of the Italian Civil Code. Thus, the breach hereof constitutes non-performance and may be a source of penalties and/or compensatory liability and lead to the termination of the contract itself, in accordance with and within the limits allowed by the nature and discipline of the individual work relationship.

To this end, any violations committed:

- by individuals who are also Addressees of the 231 Model, will be ascertained and sanctioned by referring to the analytical sanction system provided for and defined in the Museum's 231 Model;
- for the other Addressees, who are subject exclusively to the Code, specific negotiated remedies to be provided for in each contract shall be applied, such as, for instance and mainly, express termination clauses, pursuant to Article 1456 of the Italian Civil Code, or, where deemed appropriate, other remedies/measures compatible with the nature of the existing legal relationship. The ascertainment of violations and the possible, concrete adoption of the envisaged sanction shall be carried out by the department and/or person with the necessary powers on a case-by-case basis.

All Addressees are obliged to report in writing any violation/possible violation which they are aware of; except from cases of liability for slander or defamation, or pursuant to Article 2043 of the Italian Civil Code, any addressee of the Code who reports unlawful acts or facts, or even merely irregular acts or facts, of which they have become aware because of or in connection to their work relationship with the Museum to their hierarchical superior, to a member of the

Management Committee and/or the Supervisory Body, shall not be subject to any measure and/or sanction, even if only compensatory, as well as, in any case, to any retaliatory/discriminatory action for reasons directly or indirectly connected with the aforesaid report. Any threat or any similar initiative and/or measure shall be immediately reported to the Management Committee and to the Supervisory Body.

During the sanction proceedings against the Addressees, the identity of who filed the report may not be disclosed without their consent, provided that the objection to the charge/violation can be adequately based on separate and additional investigations other than the report. If, on the other hand, the allegation can only be adequately based, in whole or in part, on the report, the identity of who filed the report may be disclosed where knowledge thereof is essential for the defendant's defence.

### **3. Updates and/or revisions of the Code**

The Code is subject to updates and/or revisions/implementations whenever it is deemed appropriate, for example when new legislation and/or changes in the Museum's organisation and/or activities suggest it.

Any updates and/or revisions/implementations to the Code are based on the proposal of any Museum Body as well as of the Supervisory Body, appointed at the same time as the adoption of 231 Model, and become effective upon approval, by means of a formal resolution, by the Museum's Management Committee.

Once approved, the updated/revised version of the Code is disseminated or in any case made known to the Addressees in the manner indicated below.

### **4. Dissemination and Understanding of the Code**

In consideration of the foregoing, the Museum:

- guarantees the timely dissemination of the Code and/or making it aware to the Addressees, as well as internally, also through the dedicated training;
- Provides and information and/or clarification regarding the contents of the Code upon simple request;
- endeavours to ensure that all Addressees respect the values and general principles of conduct defined in the Code;
- ensures that all Addressees can report any shortcomings/violations and thus actively contribute to its implementation;
- ensures that all updates and/or amendments are promptly brought to the attention of the Addressees in the manner deemed most appropriate from time to time.

The Code is disseminated and made known within the Museum by means of:

- full publication of the updated version of the Code on the Body's Intranet;
- posting of a copy of the full, updated version of the Code on internal notice boards, also pursuant to and for the purposes of Article 7 of Italian Law No. 300/1970 (the so-called 'Workers Charter');
- guaranteeing the Addressees a complete copy of the Code in digital or hard copy format, as well as outside the Museum by means of:

- a) delivery to the addressee of a complete copy of the Code in digital or paper format, upon simple request;
- b) publication, also in form of a summary, of the updated version of the Code on the Museum's website;
- c) Including a specific clause in individual contracts aimed at informing the other party to a contract with the Museum of the existence of the Code.

#### **5. Entry into Force of the Code**

The Code comes into force after its first, formal approval by the Management Committee.

## II. SPECIAL SECTION

### 1. FUNDAMENTAL VALUES AND GENERAL PRINCIPLES OF CONDUCT

#### 1.1 Legality and Prevention of Conflict of interest

All Addressees of the Code are required to act in strict compliance with the laws, regulations and with this Code, *mutatis mutandis*, according to their respective powers and roles within the Museum, to the procedures as well as to the Organisational, Management and Control Model, adopted by the Museum pursuant to and in accordance with Italian Legislative Decree No. 231/2001.

Internal Addressees are also required to work in the exclusive institutional interest of the Museum for the most correct and effective pursuit of its objectives, avoiding any conflict of interest, namely to take part in any operation/activity/decision in which an interest other than that of the Museum is pursued; or situations in which the individual, through the Museum even just partially, takes advantage of, or cultivates, business opportunities, for themselves or third parties.

#### 1.2 Honesty, Correctness and Good Faith in the Performance of all Activities. Non- discrimination

All activities must be carried out and performed in accordance with principles and values of honesty, correctness and good faith.

Relations, at all levels, between employees and/or collaborators as well as with third parties must also be characterised by correctness, loyalty and mutual respect. All activities must be carried out with the utmost diligence, commitment and professionalism, in accordance with each individual's assignments and responsibilities, also with a view to the continued protection of the Museum's prestige and reputation.

The Museum rejects and opposes any form of discrimination on grounds of, for example, race, nationality, religion, language, sexual orientation, political opinions, age, state of health and membership of trade unions and/or political associations.

#### 1.3. Confidentiality and Privacy

A part from what is legally and/or contractually allowed, the Addressees shall not, in any way whatsoever, use communicate or disseminate any information and/or document and/or data concerning the Museum, to be considered as of now unconditionally confidential, as well as any news/document objectively confidential or even only indicated as such by the Museum and acquired by the Addressee by virtue of and/or in the course of the relations established with the Museum.

Thus, it is neither permitted to make copies, in any form or on any medium, of information and/or documents and/or data, or to remove documents or other archived material owned or available to the Museum, unless this is legitimate and necessary to perform specific tasks.

Documents that do not need to be stored must be destroyed in a manner that complies with current legal or regulatory requirements.

All Addressees of the Code are, *mutatis mutandis*, obliged to strictly comply with current privacy legislation, in particular the provisions of Italian Legislative Decree No. 196 of 30 June 2003.

The Museum pays particular attention to the implementation of the provisions concerning the protection and safeguarding of personal data, and adopts the minimum and appropriate security measures to reduce, as far as possible and according to technical progress, the risks of unauthorised communication/diffusion of data it holds, as well as the

risks of unauthorised access or, in any case, unauthorised processing of the same. All employees and collaborators of the Museum, in the exercise of their duties and within the scope of their competences, are responsible for the implementation of these security measures, both with regard to IT tools and with regard to archives and paper files.

#### **1.4. Anti-corruption Mismanagement Practices**

The Museum is committed to implementing all actions and measures necessary to prevent and avoid corruption and mismanagement, which include all cases of significant deviation of behaviour and decisions from an ethical and impartial administration, and all situations in which private interests improperly influence the Museum's actions.

In this regard, it is absolutely forbidden for anyone working in the name and on behalf of the Museum to accept - or give - sums of money, goods or other benefits to third parties in order to obtain undue personal advantages and/or to the detriment of the Museum and/or in the interest or to the advantage of the Museum or, in any case, to the detriment of the Public Administration.

All Addressees must refrain from giving or accepting gifts and/or other types of offering that are aimed at improperly and/or unduly gaining advantages for themselves, for third parties or for the Museum. In any case, only acts of courtesy of modest value are permitted ('modest value' refers to an amount not exceeding €150). Anyone working within the Museum who receives proposals or requests for gifts or favourable treatment or hospitality that are not of modest value must reject them and promptly inform their direct superior and the Museum's Supervisory Body.

It is absolutely forbidden for all Addressees to offer and/or pay, even indirectly, sums of money or other benefits to public officials, persons in charge of a public service, public or private employees, in order to influence and/or compensate them for an act of their office and/or contrary to their office.

#### **1.5. Transparency**

The information provided in any transaction and/or decision concerning the Museum's activities must be inspired by the utmost completeness and truthfulness.

In particular, all the Addressees involved in managing accounting, as well as any other relevant document regarding economic, asset, financial and fiscal matters, are required to actively collaborate, using the international accounting standards that are institutionally applicable and suitable for providing the most faithful and correct representation possible of the Museum's asset, economic and financial situation, noting and recording all management events and accounting data, as well as reporting any mere errors and any anomalies found to the Museum.

As mentioned above, the Museum complies with the regulations regarding the transparency of its activities and organisation. More specifically, the Museum uses its institutional website to disclose the information which must be published pursuant to current legislation (in particular, Italian Legislative Decree No. 33/2013 and Italian law No. 190/2012, in the terms and manner clarified by ANAC [*The Italian National Anti-corruption Authority*]) to the public, ensuring, among other things, its integrity, constant updating, timeliness and easy consultation.

#### **1.6. Fair Competition**

The Museum is aware of the fundamental importance of a competitive market for the community and undertakes to comply with the laws and regulations in force regarding competitions



and transparency in commercial transactions, and to refrain from entering into agreements with entities that may adversely affect free competition and equal opportunities in the market.

Therefore, all Addressees are bound to avoid practices that may represent a violation, in any form whatsoever, of the provisions described above.

### **1.7. Prevention of Handling Stolen Goods, Money Laundering and Use of Money, Goods or Other Benefits**

The Museum conducts its business in full compliance with the provisions of the Italian Criminal Code as well as with current legislation regarding money laundering and requires the same from all Addressees.

The Museum is committed to the utmost transparency in business transactions and provides all the instruments deemed most appropriate from time to time in order to prevent the phenomena of handling stolen goods, money laundering, the use of money, goods or other benefits of illicit origin and self-laundering.

In this regard, it is absolutely forbidden to replace or transfer money, goods or other benefits deriving from unlawful activities or to carry out, in relation to the preceding, other operations that hinder the identification of their origin; likewise, it is not permitted to use the aforesaid assets in economic or financial activities that are lawful in themselves.

The Museum's internal Addressees are required to verify the information available on business partners and suppliers preventively in order to ascertain their respectability and the legitimacy of their activities before establishing any business relationship or partnership with them.

### **1.8. Promoting Culture**

In view of its role on a local, national and international level, the Museum constantly works and makes every effort to promote, foster and increase culture in all its forms, and of course and in particular, cinematographic culture in all its aspects. In more detail, the Foundation mainly fulfils this role by managing and organising, directly or indirectly

- the Museo Nazionale del Cinema which is among the most important in the world for the richness of its heritage and for the variety of its scientific and dissemination activities;
- the Cinema Massimo, which is a state-of-the-art multiplex cinema with art-house screenings;
- three film festivals, namely the Torino Film Festival, the Lovers Film Festival and the CinemAmbiente Festival;
- the TorinoFilmLab, an international workshop that supports young talents from all over the world through training, development and funding activities, dedicated to emerging directors and screenwriters.

### **1.9. Intellectual and Industrial Property Protection**

All Addressees are required to comply with current laws and contracts legitimately entered into, concerning copyrights and/or related rights as well as, in any case and more generally, intellectual/industrial property.

In particular, by way of example only, the Museum prohibits all Addressees from carrying out:

- the unauthorised duplication, reproduction, transmission, projection, distribution, communication and/or dissemination, including through telematic networks and/or connections of any other kind, as well as the processing, transformation and/or translation of any intellectual work (including phonograms and/or videograms

of musical, cinematographic or assimilated audiovisual works and/or sequences of moving images, as well as databases) or parts thereof, including the relevant audiovisual and/or literary parts;

- the abusive use, in any form and/or manner and for any purpose, including personal use, of intellectual works - including the relative supports and/or goods of any other type that are in any case protected by copyright - or, more generally, of any intellectual and/or industrial property and/or civil law rights, therefore including image rights and the right to a name, as well as any type of secret and/or know-how.

Furthermore, in all cases the Museum expects strict compliance with the rules relating to the management of the SIAE [*Italian Society of Authors and Publishers*] and to all obligations (including information/communication ones) with regard to the SIAE and/or any other body/subject in any case competent in relation to the Museum's activities.

#### **1.10. Occupational health and safety**

The Museum requires that all Addressees, *mutatis mutandis*, scrupulously observe and ensure compliance with current prevention legislation, and thus, in particular, with Italian Legislative Decree 09 April 2008, No. 81.

As far as it is directly concerned, the Museum aims to create a working environment where there dangers to the health and safety of workers do not exist and where operational risks are reduced to a minimum; to this end, it constantly monitors the facilities it has access to in order to aspire to the highest possible level of safety. It also promotes responsible behaviour and adopts every appropriate preventive measure in order to preserve the safety, health and security not only of its staff, but also of all those who visit its premises and, in particular, visitors and the public.

More specifically, the Museum undertakes to:

- fully comply with the provisions in force regarding the protection of health and safety in the workplace;
- adopt measures that, based on the activities carried out, on experience and on technology, are necessary to protect the physical integrity and health of workers and all those who visit its premises;
- promote the participation of the Addressees, as far as is reasonably possible in the exercise of their functions, in the process of risk prevention and protection of health and safety in the workplace.

#### **1.11. Environmental Protection**

The Museum is aware of the importance of satisfying the expectations and needs of the community regarding this sector and contributes to raising awareness of issues relating to the protection and respect for the environment and manages its activities by complying with the regulations at all levels in force and expecting the same from all the Addressees of the Code.

In this regard and in view of its activities, the Museum takes every reasonable measure to safeguard and protect the environment and condemns all forms of deterioration and compromise of the ecosystem.

## 2. Fundamental Values and General Principles of Conduct in Relations with Subjects/Private Bodies

### 2.1. Relations with Employees and Collaborators

#### a) Staff election and career advancement policies

The technical ability/preparation, professionalism and diligence, honesty, loyalty and dedication of the staff, as well as being decisive requirements for the achievement of the Museum's objectives, represent the (professional and human) characteristics that the Institution requires from its employees and collaborators. Therefore, in the staff selection/career advancement process - obviously conducted with respect for equal opportunities and without giving space to any form of prejudice and/or discrimination - such characteristics are a primary consideration.

Moreover, as part of its selection process, the Museum endeavours to ensure that the resources acquired correspond to the profiles required for its needs, avoiding favouritism and/or facilitation of any kind. The establishment of the relationship with the selected candidate presupposes the formal signing of a valid contract that must present all the fundamental and typical elements of the relationship established.

In regard to salary and career advancement, the Museum uses objective and impartial criteria, giving maximum value on meritocracy and, therefore, on the results achieved and the skills demonstrated by the individual worker.

#### b) Protection of workers and working conditions

The Museum considers it essential to respect the human fundamental rights by protecting people's physical and moral integrity and also condemning and prosecuting any form of favouritism and/or discrimination in the workplace.

The Museum is committed to complying with the labour law provisions of all sources of law, laws, regulations and collective wage agreements in force with its employees, especially as regards working hours, pay, contributions and the protection of health and safety at work.

Hierarchical power is exercised with full respect for the rights of staff. At the same time, employees cooperate by observing the instructions given to them by their superiors and by exercising the utmost diligence and skill in carrying out the tasks entrusted to them.

The Museum prosecutes and represses all forms of harassment against its employees and staff in the workplace.

#### c) Fighting exploitation

The Museum rejects and opposes illegal employment and does not employ people younger than the age established by current legislation regarding work. Moreover, the Museum undertakes not to establish or maintain business relations or partnerships with third parties who are found to employ child labour, as defined above.

The Museum does not establish relations with foreign workers who are present irregularly on Italian territory. In particular, the Museum does not employ workers without a residence permit, or with an expired, revoked or cancelled residence permit.

#### d) Use of working tools

It is the responsibility of each employee and/or collaborator to keep and conserve the Museum's assets and resources entrusted to them for the fulfilment of their work, with the consequent obligation to return them - if necessary, even upon simple request - in the same state in which they were delivered; furthermore, it is their responsibility to

keep all data concerning the work activity, in the meantime stored therein, integral and complete: no employee or collaborator may make improper use of the Museum's assets and resources or allow others to do so.

The tools, including electronic/informatic tools, through which e-mail, the Internet and the computer network are accessed, belong to the Museum and their use is therefore only permitted for the purpose of fulfilling the respective contractual obligations. Therefore, the use of such tools must be carried out in strict compliance with the relevant laws, regulations and company directives.

No improper or incorrect use of the aforementioned tools, in particular of electronic/computer tools, is tolerated, including:

- unauthorised access to the company's computer system and/or the computer systems belonging to others;
- any violation of the Museum's and/or any third party's industrial and/or intellectual property rights (e.g. through the use of software without a regular licence)
- the transmission, communication and/or dissemination of confidential information without proper authorisation;
  
- access, creation, display, transmission or any kind of use of content that:
  - is unlawful, harmful, threatening, abusive, harassing, defamatory and/or slanderous, vulgar, obscene, damaging to the privacy of others, racist, xenophobic, classist or in any case reprehensible content or content aimed at the sexual exploitation or violence of persons, including the publication of pornographic photos or abusive sexual images of children, offers of prostitution or other invitations with sexual content, as well as links to adult-only sites;
  - is propaganda, including trade union-political propaganda, and/or the use of symbols that are considered illegal under the laws of Italy and/or the User's country;
  - is aimed at promoting or carrying out criminal activities, including paedophilia, fraud, computer crimes, illicit drug trafficking, stalking behaviour, gambling, recycling, theft and illicit trade, including trade/industrial secrets, etc;
  - contains viruses, malware, trojans or any other code, file or programme created to interrupt, destroy or limit the operation of the Museum's and/or third parties' software, hardware or telecommunications equipment;
  - is potentially damaging, in any form, of the reputation of the Museum and/or any third party.

e) Conduct in the workplace

As far as is reasonably possible, the Addressees of the Code, in addition to adhering to strict compliance with current laws, regulations and company directives, must endeavour to maintain a dignified working environment, where the dignity of each individual is respected.

In particular, Addressees:

- must not work under the influence of alcohol or drugs;
- must avoid behaviour that may create an intimidating or offensive climate towards colleagues or subordinates;
  
- must establish and promote a respectful and cordial atmosphere towards colleagues or subordinates;
- must respect the ban on smoking.

## 2.2. Relations with the Public Administration

The Museum's relations with the Public Administration must be based upon the strictest compliance with the provisions of the law and regulations in force and may in no way compromise the integrity and reputation of both parties.

For the purposes of the Code, Public Administration means, by way of example and not limited to, any public body, public officials or public service officers (operating on behalf of the Public Administration, whether central or peripheral, or of legislative bodies, European institutions, international public organisations and any foreign state), the Judicial Authority, Public Supervisory Authorities and other independent authorities, as well as private partners who are concessionaires of a public service.

The undertaking of commitments and the management of relations of any nature with the Public Administration are reserved exclusively to the designated Museum bodies and to authorised personnel.

Gifts or courtesies towards persons belonging to the Public Administration must comply with the value limit imposed by the code of conduct for public employees (€ 150) and, in any case, must not be interpreted as aimed at acquiring or attempting to acquire undue advantages for the Museum.

In its relations with the Public Administration and, in particular, in the event of public tenders and/or competitions, the awarding of public contracts, as well as checks/inspections/audits, without prejudice to the obligations imposed by current legislation, the Museum undertakes:

- to not offer employment and/or business opportunities to persons belonging to the Public Administration, or to their relatives, unless at least two years have elapsed since their status ceased.
- to not offer, directly or through third parties, gifts or other benefits, unless they are of modest value, to persons belonging to the Public Administration, or to their relatives, with whom the Museum has relations of any kind, in order to influence or reward an act of their office and/or contrary to their office
- to not solicit or obtain confidential information that compromises the integrity and reputation of both parties or that, in any case, violates the equal treatment and open public procedures initiated by the Public Administration;
- to not send false or artfully worded documents attesting to non-existent requirements
- to not provide untrue guarantees;
- to not direct the contents of the service offered in one's own personal interest and to the detriment of the Public Administration;
- avoid creating the conditions for any situation of conflict of interest with the Public Administration.

Employees and collaborators who receive requests, including implicit ones, for benefits of any kind from persons belonging to the Public Administration, at the Museum must interrupt all relations and inform their hierarchical superior as well as the Supervisory Body.

### a) Funding and public grants

In the event of the Museum's participation in calls for tenders to obtain funding, grants, subsidies or other sums, howsoever called, from the Public Administration, any artifice or deception aimed at unjustly obtaining such sums or at diverting their use is strictly forbidden.

### b) Relations with the Judicial Authority

The Museum actively cooperates with the judicial authorities, law enforcement agencies and any other public body in inspections, audits, investigations or legal proceedings.

To this end, the Addressees are obliged, when requested, to give truthful, transparent and exhaustively representative accounts of the facts, and to provide the utmost helpfulness and cooperation to

those who carry out inspections, controls and investigations as part of judicial proceedings regarding the Museum's work.

When judicial proceedings are expected or imminent, no one shall destroy or alter any type of document, whether paper or computerised, or records and minutes.

c) **Relations with Public Supervisory and Inspection Authorities**

In the context of relations with Public Supervisory and Inspection Authorities, the Museum ensures the utmost helpfulness and cooperation, including during inspections and audits. In this regard, the Museum is committed to ensuring complete information, data and documentation in compliance with the principles of transparency, completeness and correctness.

### **2.3. Relations with the Public**

The Museum aims to satisfy the highest and legitimate expectations of the public and to address them in a correct and timely manner, providing quality products and services.

Therefore, the Museum expects that all relations and contacts with the public are characterised by honesty, correctness, impartiality, professionalism and transparency.

### **2.4. Relations with Suppliers and Other Contractual Partners**

The selection of suppliers and/or other contractual partners from which the Museum procures goods and/or services takes place by ensuring equal treatment, in compliance with internal procedures.

The products purchased and/or services received must always be justified by concrete internal requirements, justified and represented by the persons responsible for making the spending commitment, within the limits of the available budget.

The choice of the contractual partner must be based on objective technical and economic evaluations, thus taking into account primarily the quality and price offered, as well as verifying that the product's conditions or the overall service are actually adequate to the Museum's needs.

Relations with suppliers and any other contractual any other party to a contract with the Museum are managed in accordance with the principles of honesty, correctness and good faith.

Before proceeding to the payment of the previously agreed consideration, the competent body inside the Museum verifies the completeness and timeliness of the service provided as well as the fulfilment of all the obligations of the other party to a contract.

### **2.5. Relations with Sponsors**

The Museum only receives sponsorships from organisations with a recognised reputation on the market and that are dedicated to respecting legality and the other values and principles defined in this Code.

In its relations with possible sponsors, the Museum applies the principles of the utmost transparency and correctness, committing itself, in particular, to managing funds in a way that is consistent with the indications agreed with such sponsors.

To this end, the Museum will first provide the sponsors with detailed information on the project/activity to be financed, the way in which the funds are to be used, and commits to comply with any obligations undertaken (e.g. in terms of visibility to be acknowledged to the sponsor), ensuring that all information concerning donations is treated with due confidentiality or secrecy, in accordance with current legislation.

It is in any case forbidden to allocate - even partially or temporarily - the sums received as donations, contributions or gifts for purposes other than those for which they were given.

## **2.6. Relations with Political and Trade Union Organisations**

The Museum's resources are exclusively destined to the pursuit of its institutional aims, in compliance with the principles of legality, correctness and effectiveness of every managerial and/or financial act; in any case, the Museum does not finance or otherwise support, even indirectly, political parties, movements, committees and political and trade union organisations, nor their representatives or candidates, with the exception of contributions due on the basis of specific regulations.

Any initiative regarding this matter on the part of the Museum's internal Addressees is to be understood as exclusively personal and not including any expense for the Museum and any involvement of its image and institutional role. In any case, it is strictly forbidden for internal Addressees and their relatives to promise or pay money, goods or other benefits to political parties, movements, committees and political and trade union organisations, or to their representatives, in order to promote the alleged interest of the Museum and/or procure an alleged advantage.

## **2.7. Relations with the press and other media**

In recognising that the press and other media play a role of primary importance for the free circulation and dissemination of information, the Museum interacts with the press and other media in accordance with the principles of truth, correctness, transparency and prudence. External communication is essentially aimed at raising awareness of institutional activities and programmes/projects/events organised or managed by the Museum.

Information given to the so-called mass media must be accurate, coordinated and consistent with the principles and policies of the Museum, it must comply with laws, rules, and practices of professional conduct, and it must be carried out with clarity and transparency. The dissemination of false or misleading information is in any case forbidden.

Relations with the press and other media are reserved exclusively to the authorised Museum bodies or delegated persons. In order to safeguard the Museum's image, it is forbidden for any other person to give interviews or communicate/disseminate any kind of statement/information concerning the Museum, even if solicited to do so by external parties.