

# Code of Ethics



Bambino Gesù  
OSPEDALE PEDIATRICO



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BOARD OF DIRECTORS MEETING DATE

FORMALISATION

23 January 2020

Chairman Prot direg 6/2021 dated 8 September 2021

This text – which replaces in its entirety the previous Prot. direg 1/2020 dated 18 February 2020 – has immediate effect and may be circulated by Bambino Gesù Paediatric Hospital for the uses permitted.

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## - PART ONE -

# The mission, purposes and recipients of the Code of Ethics

### 1.1 The mission that underlies the Bambino Gesù children's hospital

The Bambino Gesù Children's Hospital (hereinafter also referred to as the "Hospital") is an institution of the Holy See, reporting directly to it and submitting to its supervision and direction. It was established in the second half of the nineteenth century thanks to the generous initiative of the Dukes Scipione and Arabella Salviati. Its foundation dates back to 19 March 1869. Since 1985, it has been recognized as a Scientific Institute for Research, Hospitalization and Healthcare (IRCCS) in pediatrics. It is also accredited as an Academic Hospital by Joint Commission International (JCI).

Constantly referencing the Catholic values and the resulting principles that inspired its establishment and ensure its development, the Hospital pursues the best assistance together with the best translational research activity, which is always clinically oriented. It strives for the true good of the patient, integrating the new gains made by biomedical research, all in a context of sustainability and continuity. This ensures an increasingly effective hospitality and assistance to patients (children, teenagers, adolescents and, more generally, all patients in the pediatric field) and their families, both local, from Italy, and from every country in the world.

Without ever pursuing profit, the Hospital provides clinical assistance in the pediatric field, even to those whose access to care is not always guaranteed, at the detriment of human and spiritual dignity.

The clinical assistance, didactic, scientific and administrative activities are guided by the following principles:

- the centrality of the human person, who is entitled to the highest dignity, understood as full recognition and respect for human beings, who must be served by every expression of assistance activity and scientific and technological research;
- striving towards new goals achievable by scientific and technological progress, understood as a projection into the future to keep pace with progress, within the framework of the Christian vision of existence and respect for the person, with the aim of humanizing science and technology and make it a sign of Christ;
- excellence, understood as a continuous effort to reach the highest level in every situation and attitude, which must guide all research, technology, professionalism and behaviour.

All this in the context of the essential ethical principles of Catholic morality and, therefore, of the sacredness of life, with the awareness that it is always a blessing, with the purpose of both spiritual and material charity.

The above is the response to the broader mission that the Pope entrusted to the Hospital: support the poorest to build a world in which there is no longer an insurmountable furrow between the haves and the have nots, between those who can afford healthcare and those who cannot.

This puts into action Christ's teaching to treat the sick and serve the infirm, which is the mission on which the entire activity of the Bambino Gesù Children's Hospital is based.

## 1.2 Purposes and recipients of the Code of Ethics

Within the framework of the mission, the Code of Ethics sets out the values, principles and rules of conduct which characterize the activity of the Bambino Gesù Children's Hospital in all its components, both internally and in its external relations, in an overall framework that involves all the stakeholders.

The Code of Ethics is thus an integral part of the internal control system and, as such, has a strong strategic value in the prevention of illegal behaviour and in the consolidation of a culture that increasingly values ethics, fairness, observance of the rules and transparency.

Through the Code of Ethics, the Hospital also intends to consolidate its relationship of trust with all stakeholders, aware that it is the bearer of noble values due to its distinctive nature as an institution of the Holy See. The Hospital believes that legal rules are not sufficient if not supported by ethics, suitable for guiding individual and collective behaviours and choices, to pursue the high interests which underpin the mission of the Bambino Gesù Children's Hospital.

It follows that the Code of Ethics takes on a mandatory nature:

- for people who hold positions and responsibilities in the Hospital's governance and organizational structure, including the members of the Hospital Bodies and all those who, in any form, perform work in the Hospital or who act and work in any way in the name and on behalf of the Hospital (hereinafter also referred to as "Recipients"). By observing and complying with all the principles, values and rules of conduct contained in the Code of Ethics, the Recipients, each within their own responsibilities and powers, contribute to achieving the Hospital's mission and objectives. This is fundamental for the proper functioning, reliability, credibility and reputation of the Hospital. For all intents and purposes, the compliance with the Code of Ethics must be considered an essential part of the contractual obligations assumed with the Hospital. All Recipients have the duty to be familiar with the Code of Ethics, to understand its meaning, and to actively contribute to its implementation.
- for third parties who have relationships with the Bambino Gesù Children's Hospital (suppliers, contractors, consultants and partners, hereinafter, also "Third Party Recipients"), the provisions of the Code of Ethics are applied as part of the existing contractual relationships. The Hospital requires them to maintain a conduct in line with the values, principles and rules of conduct specified in the Code of Ethics. To this end, the contracts include clauses and/or require signing declarations aimed at obtaining the commitment of these parties to behaviours and actions that do not conflict with the values, principles and rules of conduct of the Code of Ethics, also setting out consequences if it is breached.

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## - PART TWO -

### Values

#### 2.1 Value of life and of spiritual and human dignity

Inspired by the centrality of the human person, the Bambino Gesù Children's Hospital carries out its work by giving attention to the value of life and the personal dignity of every person. These are protected by the Hospital as a fundamental element of Christian ethics, physical and mental integrity, and respect for physical and psychological suffering.

The words of the Evangelium Vitae of St. John Paul II are an inspiration; "Life is always a blessing. This is an intuition, or even a piece of experience, whose profound reason every man is called to grasp". On the scope of this fundamental moral principle, the Hospital upholds and respects the dignity of the human person, created in the image and likeness of God, in every phase of its existence, from conception to death.

The value of life therefore requires protecting the physical and moral integrity of patients and their families, their safety and their right to have adequate, competent and attentive care and assistance. It also requires protecting the integrity of all those who work within and in the interest of the Hospital, ensuring their working conditions are respectful of individual dignity, offering safe and healthy working environments. The sacred concept of life, taught and defended by the Catholic Church, is the root of these fundamental principles: protection of physical life, the therapeutic principle, or the principle of wholeness or benefit (proportionality of care, prohibition of aggressive treatment), the principle of solidarity and subsidiarity.

Personal dignity includes equal social dignity and, therefore, also equality, impartiality and equal opportunities. The Hospital therefore firmly rejects any form of discrimination.

However, personal dignity is not only social; it is also closely related to the sacredness of life. In this context, the Bambino Gesù Children's Hospital rejects any clinical assistance that provokes the voluntary interruption of life, such as abortion or euthanasia. Every intervention is aimed at diagnostic, therapeutic and rehabilitative goals that reduce as much as possible any physical and psychological suffering.

#### 2.2 Legality

Compliance with current regulations, whether legislative or statutory, constitutes a further essential value that the Bambino Gesù Children's Hospital's activity is based on.

Within the scope of their respective responsibilities, the Recipients are therefore required to know and observe the laws and regulations applicable to their activities, to avoid any behaviour that could expose the Hospital to a risk of conduct in breach of the current legislation.

#### 2.3 Ethics of the Scientific Research Activities

The Bambino Gesù Children's Hospital carries out research guided by the principles of Catholic Doctrine, always giving particular attention to the centrality of the person, the value of life, and the

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respect for human dignity in its physical, psychological and spiritual dimension, starting from the moment of conception.

Also taking into account its qualification as a Scientific Institute for Research, Hospitalization and Healthcare (IRCCS), the Bambino Gesù Children's Hospital ensures that all research is conducted according to rigorous scientific methods and in compliance with current legislation on biomedical research and health protection.

## 2.4 Solidarity

The Bambino Gesù Children's Hospital recognizes the great value of solidarity, striving to implement it with actions that bring the Hospital's services to the weakest and least fortunate patients, also through collaborations at the national and international level.

## 2.5 Health and safety of people

The Bambino Gesù Children's Hospital gives particular attention to creating environments that ensure conditions are respectful of human health, safety and well-being.

Health and safety are appropriately monitored through a number of cardinal activities: identifying hazards and implementing the necessary preventive actions; constantly updating the risk assessments; consequently identifying the corrective actions and monitoring their effectiveness in order to constantly improve the health and safety protection levels. These activities are also supported by adequate training and communication activities, as well as constant methodological and professional updates.

The Bambino Gesù Children's Hospital is also aware that adopting an organizational system aimed at ensuring the achievement of health, safety and well-being goals can also promote efficiency, reducing the costs deriving from accidents, injuries and occupational diseases. It also improves the levels of health, safety and well-being at work and creates a peaceful working environment.

## 2.6 Environmental protection

The Bambino Gesù Children's Hospital is committed to safeguarding and respecting the environment, and its activity is always based on environmental compatibility and sustainability.

The Hospital complies with regulations and is active in limiting the environmental impact of its activities. In particular, it undertakes to comply with the obligations, prohibitions and restrictions in this field, to properly dispose of waste, and to carry out actions aimed at the continuous improvement of its environmental performance, aimed at saving energy and water, at minimizing waste production, and at the recovery of resources.

The Recipients are required to scrupulously comply with the procedures adopted by the Hospital on environmental matters.

## 2.7 Confidentiality



The Bambino Gesù Children's Hospital is committed to ensuring the protection and confidentiality of personal data and information in its possession in accordance with applicable data protection legislation.

The personal data of which the Bambino Gesù Children's Hospital is the Data Controller (in particular, personal data of patients, their families and people who exercise parental responsibility or legal representation, as well as all those who have relations with the Hospital, including people who provide their services for any reason) are processed in accordance with the provisions of the General Data Protection Regulation (Regulation (EU) 2016/679 of the European Parliament and of the Council of 27 April 2016) and Italian Legislative Decree no. 196/2003 as amended, and, in this context, by the Organisational Privacy Model adopted by the Hospital, as well as by the additional related specific internal. In any case, this processing ensures that pursuant to the aforementioned legislation, data subjects can exercise their fundamental right to the protection of personal data and, therefore, decision-making self-determination and control over the collection, use, dissemination and storage of the data.

The Recipients are required to always act in compliance with the confidentiality obligations assumed by the Hospital. For this reason, they are prohibited from disclosing or using personal data and, more generally, all confidential information that they have become aware of while performing their work for any purpose unrelated to said work.

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## - PART THREE -

### General rules of conduct

#### 3.1 Organizational principles

In carrying out its activities, the Bambino Gesù Children's Hospital undertakes to act with correctness, transparency, truth and traceability, also in reporting the achieved objectives and the resources used.

The Recipients are therefore required to ensure the maximum truthfulness, transparency and completeness of the information, both verbal and documentary (paper and digital), produced by their work within their respective areas of responsibility.

All operations and transactions must be legitimate, consistent and appropriate, authorized, correctly recorded and verifiable. All actions and operations must be adequately recorded, also to ensure the ability to verify the decision-making, authorization and implementation process. Every operation must be adequately documented so that, at any time, checks can be conducted to certify the characteristics and the reasons for the operation, and identify who authorized, performed and recorded the operation.

All processes and procedures are structured so as to guarantee: (a) separation of duties and responsibilities; (b) independent analyses related to areas of responsibility and technical professional skills; (c) preliminary assessment of sustainability and legal adequacy of the initiatives; (d) preparation of specific documents proving the operations and the objective basis of the choices; (e) recording, detection, reporting, traceability and documentability of data, information and controls; (f) formal assessment and authorization of operations; (g) definition of the acts in accordance with the powers of representation and signature; (h) monitoring; (i) filing.

#### 3.2 Dissemination and consolidation of the culture of transparency and control

The Bambino Gesù Children's Hospital is committed to the dissemination and consolidation of a culture of transparency and control that values ethics, loyalty and good faith, correctness, and compliance with the rules.

Conducting the activities transparently, with ethics, loyalty and good faith, correctness and respect for the rules and the implementation of an effective control system; all these elements contribute to a management in line with these objectives, promoting informed decision-making and contributing to ensure the protection of assets, the efficiency and effectiveness of processes, the reliability of financial information, the compliance with laws, regulations, the Articles of Association and the internal procedures.

#### 3.3 Absence of conflicts of interest

The Bambino Gesù Children's Hospital works to avoid giving rise to conflicts of interest. It commits all Recipients to align their conduct with this principle, refraining from any situation or activity - even if only potential - that could pit a personal interest against the Hospital's, or that may interfere with the ability to make, impartially or objectively, decisions in the Hospital's interest.

### 3.4 Assets and financial flows

The Bambino Gesù Children's Hospital guarantees that the assets and the related financial flows that it receives are managed in a transparent, documented and traceable manner. They are solely intended for its research, hospitality and assistance activities, where the financial remuneration is aimed at sustainability rather than profit.

Therefore, no operating profits can be distributed or allocated for purposes other than those of hospitality, assistance, and the related research in the pediatric health field.

### 3.5 Scientific Research Activities

The Bambino Gesù Children's Hospital guarantees that the research activity, be it pre-clinical or clinical, is guided by principles of methodological rigour, compliance with good research practices, critical and non-prejudicial observation of the results, abiding by its responsibility of identification, communication and appropriate protection and enhancement of the results achieved through this research activity.

### 3.6 Clinical studies and relations with the ethics committee

In the constant pursuit of its objectives of excellence in healthcare services based on cutting-edge research and clinical activities, the Bambino Gesù Children's Hospital carries out clinical studies both individually and by joining network projects.

The management of clinical studies - supported by specific procedures in accordance with the values, principles, and rules of conduct of the Code of Ethics - complies rigorously with the rules and guidelines of good clinical practice. It gives particular attention to the protection of patients' rights, following a complete and objective evaluation of the clinical scientific value, health feasibility, economic sustainability, and legal suitability.

The proper management of clinical studies requires the prior involvement of both the Ethics Committee, which expresses a binding opinion, and the competent Authorities that issue the relevant authorizations. It also requires the thorough monitoring of the correct implementation and related reporting, which is also functional to possible internal or external audits and any prompt corrective actions.

A similar independent assessment is carried out by the Ethics Committee for all the cases that require its involvement, in accordance with the provisions of external and internal regulations, including those relating to the specific duties of the Ethics Committee.

The independent assessments - of which the Ethics Committee and the competent Authorities are guarantors - take on an important role as fundamental vehicles of direction and further guarantee. This way, any cases submitted to these assessments are constantly oriented towards the respect of the ethical, scientific and methodological parameters protected by the current industry regulations and by the guidelines of good clinical practice.

### 3.7 Pre-clinical studies

The pre-clinical research activity that may include animal studies (in vivo) is carried out through the use of scientifically validated methodologies and techniques that minimize animal stress. Moreover, they comply rigorously with current legislation on the matter and with the developments that have occurred with the transposition in Italy of Directive 2010/63/EU.

## - PART FOUR -

### Specific rules of conduct

#### 4.1 Relations with patients and their families

##### 4.1.1 Centrality of patients and their families. Quality of hospitality, assistance and research

The Bambino Gesù Children's Hospital places patients and their families at the centre of its activities. The activities and the continuous improvement in clinical and scientific research are dedicated to them, with accessibility and appropriateness, equality and ethics of the health services and clinical studies, and quality and safety of the treatments and the care activities.

With the centrality of patients and their families as a constant point of reference, the Hospital bases its interactions with them on respect for the condition of disease and vulnerability. It also aims to create an integrated environment among all the parties involved, building dialogue and trust while working towards the common goal of appropriate care based on good clinical practices and always striving for excellence.

The overall care path of each patient is always fully considered, so that even in cases of serious pathologies, recovery is not the only possibility. The care path provides the best possible assistance, always ensuring dignity and the protection of life, if necessary also through the help of the Pediatric Hospice.

To this end, the Hospital favours a relational model that values the family and those who exercise parental responsibility, always taking into account the patient's primary interest and his right to self-determination.

It follows that in reference to the entire path of care and assistance, and, where applicable, to the clinical studies and scientific research, the relationship that the Bambino Gesù Children's Hospital establishes with patients and their families requires:

- compliance with the waiting lists, focusing on the reduction of the related time frames;
- the implementation - functional to a conscious decision - of transparent, understandable (and therefore where necessary also with the use of non-Italian language or interpreters with adequate linguistic skills) and thorough information that never uses deceptive or untruthful persuasive tools, solely aimed at ensuring the complete, adequate and accurate information on the diagnosis, prognosis and clinical studies and research that concern each patient, as well as on the prospects of the treatments and any diagnostic and therapeutic alternatives, and on the risks and foreseeable consequences of the choices made; this with the awareness that communication must be commensurate with the ability to understand on the cultural, linguistic, psychological and emotional level, and by highlighting, also in the medical record, the right to request a second opinion;
- acquiring free and informed consent, with the most general prohibition from exercising any form of pressure or persuasion of a scientific or other nature towards patients and their families or guiding them towards private professional visits;
- the absolute compliance with the ethical and impartiality principles also in prescribing drugs or therapeutic paths;

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- the correct management of the medical records and, more generally, of the health documentation relating to the entire clinical care path, guaranteeing its completeness, truthfulness and clarity;
- protection of confidentiality;
- the due consideration, through the relevant offices, of any complaints from users, providing adequate feedback on the outcome of the appropriate checks and implementing any corrective actions, where necessary; achieving the foregoing also through the use of specific, anonymous questionnaires - with contents also accessible in multiple languages - to measure the quality of the assistance.

The management of Clinical Risk also takes on fundamental importance as it is aimed towards guaranteeing effective and safe treatments. To this end, the management of Clinical Risk takes as a reference and makes it possible to evaluate all sensitive areas (including infections related to assistance, surgery and medications) for the purpose of implementing and monitoring the prevention measures.

The Bambino Gesù Children's Hospital commits all Recipients to align their conduct to the above principles and guidelines, also ensuring that the competent internal structures provide the necessary training.

#### 4.1.2 Hospitality services

The Bambino Gesù Children's Hospital is aware that an effective patient care path cannot ignore taking into consideration all aspects related to hospitality, which can make the hospitalization period less traumatic for the patient and his family, recreating as much as possible the space, time and pace of life outside the Hospital.

The Bambino Gesù Children's Hospital guarantees the excellence that characterizes the assistance to all the supplementary services of the treatment path as it is traditionally understood, from the admission to the post-hospitalization phase. This all-encompassing process of taking charge of patients and their families takes into account their complex and delicate needs.

To make its commitment concrete, the Hospital carries out constant checks and controls aimed at preserving adequate hospitality services. It pays particular attention to enhancing, in an organic way, all the roles involved. The monitoring also ensures an overall hospitality path for patients and their families that is adequately supported also from an emotional, psychological and spiritual point of view.

#### 4.1.3 Communication

The Bambino Gesù Children's Hospital recognizes and guarantees the right of patients and their families to receive clear and complete information. The communication must therefore be based on ensuring transparency and completeness, simplifying as much as possible the methods for accessing the information.

Abiding by the procedures and roles, the Hospital commits all Recipients to providing complete and understandable information, honouring the right to self-determination.

#### 4.2 Relations with staff

#### 4.2.1 Enhancement and protection of staff

The staff (meaning by this expression anyone who works in any form in the Hospital) constitutes a fundamental resource for achieving the Hospital's objectives and mission.

Enhancing the staff's skills and expertise is of great strategic value. High professionalism is a value that must be preserved and increased over time, because it affects the effectiveness of the outcomes of clinical care services and the quality of the results of scientific research.

The Bambino Gesù Children's Hospital recognizes the central role of the staff and, therefore, it protects and promotes their value, in order to improve and increase their professional skills.

In the context of the values that guide the virtuous professional and relational action, the staff management is based on respecting their rights and fully making the best of their contribution, promoting their development and professional growth by refraining from any discriminatory and unfair behaviour.

The Hospital adopts criteria of impartiality, merit, competence and professionalism for any decision regarding the staff relations. Selections and recruitments are guided by the principles of fairness, transparency and impartiality, banning any form of favouritism.

Staff is recruited in compliance with the labour laws and any other applicable provision, on the basis of regular employment contracts, given the prohibition of any working relationship that does not comply with or aims to elude the current provisions.

In compliance with the contractual regulations, equal job opportunities and professional development are offered, on the basis of skills, and potential and professional qualifications, without discrimination and/or favouritism, ensuring fair treatment based on individual skills and abilities.

With impartiality and respect for models of fairness, all staff are granted the same opportunities for professional growth in their role. Access to roles and positions of greater responsibility cannot however be unrelated to professional competence and experience, as well as the honesty and correctness of the individual.

The evaluation of the activity is based on objective criteria, related to measurable elements, minimizing any areas of discretion and/or discrimination.

Interpersonal relationships, which underlie hierarchical relationships, are based on a fair and correct exercise of authority, avoiding any form of abuse and harm to a person's dignity, value and autonomy. A superior hierarchical position cannot be a reason for the prevarication of subordinates. Similarly, all form of bullying or harassment, and more generally any behaviour capable of generating an intimidating, hostile or alienating work environment against individuals or groups of workers are prohibited.

The Bambino Gesù Children's Hospital guarantees the right to working conditions that respect everyone's dignity, safeguarding the staff from acts of psychological violence, counteracting any discriminatory or prejudicial attitude or behaviour that could harm people and their convictions.

Confidential information concerning staff is processed in accordance with the applicable legislation in force, with methods that ensure maximum transparency for those directly involved and inaccessibility by third parties, except for justified and exclusive work-related reasons.

#### 4.2.2 The values that must guide the staff's actions

These are the values that must guide the professional and relational actions of the staff in all the activities carried out in the Hospital and for the Hospital:

##### **Community**

Understood as the ability to build relationships of esteem and trust through professional conduct supported by skills appropriate to the role and by authentic cooperative attitudes, aimed at the care of everyone's most precious and common asset: the patients and their families.

##### **Transparency**

Understood as a set of ethically correct behaviours (loyal, unambiguous, authentic, in line with the Hospital's identity), aiming for clarity, truth and objectivity of information and respect for a system of shared values and rules that connote the Hospital.

##### **Innovation**

Understood as the study and systematic introduction of solutions that create new value, in order to have a stable improvement in the outcomes of treatments, process efficiency, and the satisfaction of patients and their families.

##### **Leadership**

Understood as the ability to inspire and help the group achieve shared goals and exploit the innate abilities of the group, through motivation for a path of continuous improvement.

#### 4.2.3 Proactive collaboration

The staff are obliged to collaborate proactively to achieve and maintain the objectives of excellence that characterize the Hospital in all its activities. They must do so with diligence and loyalty, reasonableness and objectivity, transparency, competence, professionalism, efficacy and efficiency, respect for the working environment and through constant efforts, professional updating and correct behaviour, also in accordance with any further internal provisions of the Hospital as well as, more generally, with the values, principles and rules of conduct indicated in the Code of Ethics.

In the above framework, there is also an obligation to actively collaborate in the Hospital's implementation of organizational designs and projects, with the awareness that they are the result of thorough analyses and careful evaluations by the appointed functions.

#### 4.2.4 Absence of conflicts of interest

The staff must avoid any situation or activity - even if only potential - which may pit a personal interest against that of the Hospital or which may interfere with the ability to make decisions, impartially or objectively, in the interest of the Hospital.

Before establishing the relationship with the Hospital and throughout the relationship, the staff must report every year, unless otherwise requested, the existence of relationships or assignments with third parties, even free of charge, to allow the Hospital to check for any conflicts of interest, even if only potential, or to monitor the arising of possible conflicts, or to verify compliance with the obligation of

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loyalty. While respecting freedom of opinion, this reporting obligation also applies in regard to memberships in associations whose areas of interest can create the situations specified above.

Without prejudice to the foregoing, the staff must refrain - by informing their Manager - from any initiative or action and related assessments that reflect on persons (physical, legal and non-profit) with whom the subject or his spouse, cohabiting partner, first- or second-degree relatives has (or has had in the previous two years) any interests, even if only potential. In such cases, the Manager provides the appropriate operational guidelines so that the initiative or action can be assessed and implemented with objectivity by a person other than the person in conflict of interest. The foregoing applies, without prejudice to any internal regulatory provisions supplementing the obligations in question, taking into consideration the specificity or nature of the individual initiatives.

Subject to the above, any person falling under the categories or holding roles or offices previously identified by the Chairman on the basis of the provisions laid down in the Apostolic Letter issued by His Holiness Pope Francis on 26 April 2021 in the form of a "Motu Proprio" and any subsequent amendments or additions, shall be required to sign, at the time of establishing a relationship with the Hospital, a specific statement attesting to the situations provided for therein and in accordance with any further more detailed directions to this regard expressly indicated by the Chairman himself. The declaration must be renewed every two years.

#### 4.2.5 Gifts

The Bambino Gesù Children's Hospital prohibits Recipients from accepting or offering or in any case soliciting gifts – for themselves or for subjects other than the Hospital, on account of or for the purposes of their office – and other forms of benefits or utilities, unless they are of a nature and value such that they cannot generate, even if only potentially, the suspicion of illegality or immorality or in any case of correlation with the acquisition or granting of undue advantages or with the prejudice of integrity and independence of judgement.

The value of the gifts or other type of benefits or utilities received or given cannot in any case exceed the amount of € 40.00 (between the same persons during the same year). If they are offered gifts and other forms of benefits or utilities of higher value, the Recipients are obliged to refuse, immediately reporting what happened to the Chairman.

#### 4.2.6 Confidentiality and protection of intellectual property

The staff must guarantee the maximum confidentiality of all personal data and all information that they have become aware of while performing their duties. Similarly, it is forbidden to exploit or mention the position held in the Hospital to gain undue advantages or benefits.

It is forbidden to engage in conduct that could constitute counterfeiting, alteration and/or unlawful use of trademarks, patents, trade dress, designs, models and, more generally, intellectual property. The Bambino Gesù Children's Hospital expressly reaffirms this prohibition also in consideration of the scientific value of research publications and the widespread use of computer programs to support the clinical assistance activities.

#### 4.2.7 Correct use of company assets and it resources



The staff must carefully and respectfully safeguard - also avoiding waste and in accordance with the correct exercise of the duties carried out in the Hospital - the Hospital assets assigned to or used by them, protecting their value. The staff must also refrain from any act that may compromise their functionality and must comply with the related internal provisions that govern their use in more detail, also taking into consideration the underlying risks to be prevented, such as those relating to the security and protection of IT systems.

This scope also includes the use of IT and network resources, which must be for legitimate purposes in correlation with the Hospital's activity and with the principles, values and rules of conduct that connote it. It is therefore expressly forbidden to engage in behaviour that could alter the functioning of the information systems or manipulate the data they contain.

#### 4.2.8 Protection of the hospital's image

Even outside their working activity, the staff must act with respect for the good name and reputation and, therefore, for the image of the Hospital, actively taking action for the dissemination, sharing and observance of the principles, values and rules of conduct specified in the Code of Ethics.

#### 4.2.9 Compliance with health and safety protection measures

In relation to their roles and duties, the staff are required to strictly comply with the legislation on the protection of health and safety in the workplace and, in this context, with the measures specified in the Risk Assessment Documents prepared for each Hospital site as well as with any further directives and instructions given.

In order to contribute to the dissemination of a culture of safety, the staff are required to participate in the training and information meetings organized by the Hospital and to scrupulously follow the procedures adopted by the Hospital in the field of safety.

#### 4.2.10 Ban on smoking and the use of alcoholic and narcotic substances

This is to be understood as an express ban on smoking and the use of alcoholic, narcotic and psychotropic substances not functional to the treatment, both in closed environments and in the open spaces inside the Hospital. The Bambino Gesù Children's Hospital expressly reaffirms this prohibition in consideration of the relevant values focused on the quality of the hospitality and care and on the health and safety of people.

### 4.3 Relations with institutions and regulatory bodies

The research and assistance activity requires an integrated relationship between the Institutes of Scientific Hospitalization and Care, such as the Bambino Gesù Children's Hospital, and the Institutions and Regulatory Bodies that issue authorizations, accreditations and recognitions, verifying that the requirements are maintained and carrying out supervisory activities and audits.

Aware of the importance of this relationship, the Bambino Gesù Children's Hospital, with the common goal of ensuring adequacy and excellence in research and care, establishes - through the appointed functions or duly authorized staff or consultants - a close network of relationships with institutional, ministerial and regional authorities, and with the appointed technical bodies as well as more generally

with the regulatory bodies, paying close attention to transparency, ethics, correctness and compliance with the rules.

In the relations with Institutions and Regulatory Bodies, the Hospital commits all Recipients to a conduct based on maximum clarity, transparency and collaboration, in full compliance with the law and the highest professional and moral standards.

It is therefore forbidden to exercise any action apt to improperly influence the decisions of the Institution or Body with which one interacts, in order to obtain undue advantages, or performing actions that do not comply with or are contrary to the duties of the office, in particular by offering or by promising autonomously or as a result of induction, directly or indirectly, gifts, money, favours or benefits of any kind, or engaging in conduct that aims to mislead.

The Hospital ensures full transparency, thoroughness and completeness of information in preparing communications, statements and notices directed to the above Institutions and Bodies, strictly refraining from submitting false and/or altered documents, or from removing and/or omitting to show, where due, documents, information or data of any kind. With particular reference to the discussions with the judicial authorities and in any case with all the institutions and bodies that carry out supervisory and control activities, the Bambino Gesù Children's Hospital guarantees its full collaboration, respecting their role, autonomy and power of initiative. It also reiterates the absolute prohibition on inducing any person not to make statements or to make false statements.

All services provided on behalf of the National Health Service must be legitimate, appropriate, and adequately documented, so that they may be checked at any time (i) to verify their characteristics and motivations and (ii) to identify the parties who authorized, performed, recorded and verified the service.

#### 4.4 Relations with universities, bodies and scientific societies

The Bambino Gesù Children's Hospital is aware that striving for new goals made possible by scientific and technological progress and excellence requires an effective collaboration with universities and other institutions of permanent and specialist education. Forms of collaboration with the bodies, institutions, industries and other entities of the private sector, Italian and foreign research laboratories, and other international bodies also enable coordinated programmes, helping to share common projects of research and assistance protocols, promoting the circulation and dissemination of knowledge.

In this context, the Hospital strives to ensure that the establishment and management of these relationships is also carried out by guaranteeing transparency, ethics, correctness and respect for the rules.

#### 4.5 Relations with the local and international community

Inspired by the value of Solidarity, the Bambino Gesù Children's Hospital is the protagonist of international cooperation initiatives.

The operating and governance model adopted by the Hospital in this regard is oriented towards an organic implementation of these initiatives, with the involvement of institutional bodies, based on specific agreements. These are aimed at fulfilling the primary need for medical and scientific training (both directly on site and at the Hospital), as well as offering the local communities the highly qualified or complex services that characterize the Hospital. All this in the context of a complete, organic and

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systematic assessment that can enable adequate clinical and administrative coordination, as well as the compatibility with the ordinary operational continuity of the Hospital's overall activities.

The model also provides for the identification of unambiguous targets with correlated performance indicators to ensure their monitoring, the assignment of specific budget resources, and the definition of a complete activity plan complete with timeframes. This is all guided by the usual transparency, ethics, fairness and compliance with the rules.

The model also dedicates particular importance to the coordination of the assistance to patients of foreign origin, paying attention to the aspects of care as well as the logistics, and more generally the organizational and administrative aspects.

By means of specific assessments, significant attention is also given to all emergency humanitarian interventions involving the Hospital.

#### 4.6 Relations with volunteering and associations

Volunteering Associations are an active part of a network of collaborations aimed at the continuous improvement of the hospitality and assistance services provided by the Bambino Gesù Children's Hospital to patients and their families.

In this context - and with the awareness that these Associations are not entities within the Hospital even though they carry out a significant activity for its benefit - their operations are part of specific contractual relationships supported by the prior identification of the accreditation criteria.

#### 4.7 Relations with funders and benefactors and related financial flows

The Bambino Gesù Children's Hospital does not pursue profit and relies for its sustainability on funding from public and private entities that support its scientific research and assistance activities.

The Hospital is therefore aware of the significance of this funding and of the resulting need to guarantee transparent management of the financial flows, which remain solely intended for its healthcare, assistance and research activities.

In this context, all financial flows, including those not related to the National Health Service, are supported by specific legal acts and by adequate procedures governing the management of the sensitive processes they relate to.

Specific reporting is required for all financial flows intended for clinical studies and scientific research, including the use of the Hospital's five per thousand share, which is allocated in support of specific projects on the basis of an annual distribution plan.

#### 4.8 Relations with suppliers, contractors, consultants and partners

The Bambino Gesù Children's Hospital bases its relations with suppliers, contractors, consultants and partners on legality, transparency, loyalty, correctness, and the additional values expressed in the Code of Ethics. It demands the same conduct from all those it interacts with, also through specific contractual provisions.

The selection and assessment process is supported by the establishment of a register of suppliers and contractors and is carried out according to criteria that guarantee the rotation, as far as possible, of the invitations to bid, while avoiding any situation that could generate undue disadvantage for some compared to others. It is based on cost-effectiveness of the goods and services, sustainability, quality of service, safeguard of safety and the environment, legal suitability and regulatory compliance, correctness and transparency, as well as monitoring. The foregoing must also follow any additional specific control measures defined in the internal procedures in compliance with the fundamental principles laid down in the Rules on transparency, control and competition in public contracts of the Holy See and the Vatican City State ("NCP Rules") and with the rules of conduct contained in this Code of Ethics.

Specific internal regulations govern items on loan for use and the free trials aimed at subsequent acquisitions, in order to ensure adequate assessments and authorizations based on the actual purposes.

The Hospital complies with all applicable regulatory provisions in matters of competition, refraining from engaging in deceptive or collusive conduct and, more generally, any behaviour that may engender any form of unfair competition.

Similar principles support the identification of the consultants and the establishment and management of the related contractual relationships, always ensuring that impartiality, autonomy and independence of judgement are guaranteed.

#### 4.9 Communications and media relations

The Bambino Gesù Children's Hospital is particularly attentive to the communication with all its stakeholders, rooted in a relationship and dialogue based on providing access to news and on the quality and transparency of institutional information. It thus aims to ensure clarity, truth and objectivity of the information, also to protect the image of the Hospital.

The Hospital is guided by an integrated communication model, expressed in thorough yearly institutional reporting also focused on social responsibility and on healthcare and scientific activity.

In this context - and with the awareness of the Media's importance as a fundamental vehicle of external communication - the relations with the press and other mass media are the exclusive responsibility of the Hospital's Chairman or his representatives and of the appointed communication departments, also in compliance with the fundamental confidentiality requirements that internal information may impose.

Any information regarding the Hospital's objectives, results and points of view is provided by the Chairman or his representative.

Any public speeches and announcements, also through the Media, any participation in conferences, seminars, congresses, university training events and the like, as well as the personal and editorial drafting of articles and essays on matters of direct or indirect impact on the Hospital are authorized within the scope of the provisions of specific agreements governing these events. If there are no standing agreements because they are specific or personal events, or they are not related to conventional relationships - they are authorized by the Chairman or his representative in accordance with the more detailed internal regulations and after sharing the texts and reports, if required by the topics, with the relevant Manager.

Staff participating in such events are prohibited from accepting compensation, money or other benefits from the organizing body or from any sponsors, with the exception of reimbursement of travel expenses, if provided for the other participants. This reimbursement is subject to specific authorization by the Chairman, in consideration of the absence of conflicts of interest with the Hospital in relation to the specific case or the absence of any prejudicial risks to the good operating governance, all after a compliance and transparency check.

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## - PART FIVE -

### Control system

#### 5.1 Adoption of the Code Of Ethics

The Code of Ethics is sponsored by the Chairman of the Board of Directors and is adopted and approved by the Board of Directors.

#### 5.2 Implementation and dissemination of the Code of Ethics

By observing and complying with all the principles, values and rules of conduct contained in the Code of Ethics, the Recipients, each within their own responsibilities and powers, contribute to achieving the Hospital's mission and objectives. This is fundamental for the proper functioning, reliability, credibility and reputation of the Hospital.

All Recipients have the duty to be familiar with the Code of Ethics, to understand its meaning, and to actively contribute to its implementation.

All Recipients are obliged to refrain from any conduct that is contrary to the Code of Ethics. Depending on their duties, they are obliged to adequately inform third parties about the commitments and obligations set out in the Code of Ethics and demand from them compliance with the obligations that directly concern their activities.

The Bambino Gesù Children's Hospital actively works to ensure the dissemination and knowledge of the Code of Ethics, by distributing the document through a dedicated section of the internal online platform, posting it in a place accessible to all, publishing it on the Hospital's website, and promoting and planning periodic training initiatives on the content of the Code of Ethics. In particular:

- the people who hold positions and responsibilities within the Hospital governance and organizational structure, including the members of the Hospital bodies and all those who, for any reason, work in the Hospital or who act in any way in the name and on behalf of the Hospital (Recipients) must sign a specific declaration of full acknowledgement and acceptance of the Code of Ethics, committing to comply with the values, principles and rules of conduct contained therein in carrying out their duties;
- the suppliers, contractors, consultants and partners (Third Party Recipients), are sent the notice of adoption of the Code of Ethics, informing them that the text is available on the Hospital's institutional website. To this end, the contracts with these Third Party Recipients include clauses and/or the signing of declarations aimed at obtaining these parties' commitment to behaviours and actions that do not conflict with the values, principles and rules of conduct of the Code of Ethics, also providing for consequences if it is breached.

#### 5.3 Reports

Compliance with the provisions of the Code of Ethics is entrusted to the prudent, reasonable and careful supervision of each of the Recipients.

The Recipients are therefore invited to report any facts and circumstances potentially in conflict with the values, principles and rules of conduct of the Code of Ethics which they have become aware of also due to their activities.

The reports must be made promptly and must contain the following elements: identification details of the whistleblower, precise and complete description of the facts being reported, any other persons who can provide information on the facts, and any documents and/or information to support the report.

The reports must be made in writing and addressed to the Board of Statutory Auditors, using one or both of the following methods:

- by email, to the address [segnalazioni.codiceetico@opbg.net](mailto:segnalazioni.codiceetico@opbg.net), which can only be accessed by the Board of Statutory Auditors through an alphanumeric password created and subsequently modified by the Board itself;
- by registered letter, bearing the wording "confidential", to the address: Board of Statutory Auditors of the Bambino Gesù Children's Hospital, Piazza S. Onofrio 4, 00165 Rome.

The Board of Statutory Auditors adopts a Regulation for the management of reports, which also guarantees the absolute confidentiality of the whistleblower's identity while handling the report.

The Board of Statutory Auditors has the authority to hear the report's author and any other persons involved.

If the report concerns conduct related to the members of the Board of Statutory Auditors, it must be sent to the Board of Directors by registered letter with return receipt addressed to the Chairman of the Bambino Gesù Children's Hospital at the following address: Piazza S. Onofrio 4, 00165 Rome.

The Board of Directors will take all suitable measures to guarantee the confidentiality of the whistleblower's identity while handling the report. It may also hear the report's author and any other persons involved.

The Bambino Gesù Children's Hospital grants the maximum protection provided by the current regulations to Recipients who report violations of the Code of Ethics.

The Hospital guarantees, in particular, that no one in the workplace will be subject to retaliation, unlawful conditioning, inconvenience and discrimination for reporting any violations. The Hospital prohibits any retaliatory or discriminatory actions, direct or indirect, against the whistleblower for reasons connected directly or indirectly to the report.

The violation of these measures protecting the whistleblower constitutes punishable behaviour.

Suppliers, contractors, consultants, partners and all external stakeholders, including patients' families, are also allowed to report facts and circumstances potentially in conflict with the values, principles and rules of conduct of the Code of Ethics, which they have become aware of due to their relations with the Hospital in the same manner as indicated above.

## 5.4 Penalties

The violation of the values, principles and rules of conduct contained in the Code of Ethics compromises the relationship of trust between the Bambino Gesù Children's Hospital and the Recipients. Any violations will be prosecuted vigorously, promptly and immediately, through appropriate and proportionate disciplinary measures, regardless of the possible criminal relevance of such behaviour and the establishment of a criminal proceeding in cases where they constitute an offence.

Failure to comply with the Code of Ethics and/or violation of the values, principles and rules of conduct contained therein may result in disciplinary penalties against the employees, proportionate to the

seriousness and/or recidivism of the violation and/or to the degree of guilt, in compliance with the applicable provisions of the Law and/or of the Hospital's individual and/or collective agreements.

Any behaviour of suppliers, contractors, consultants, associates and partners violating the values, principles and rules of conduct of the Code of Ethics may cause the termination of the contract, in accordance with the clauses of their contracts.

Without prejudice to the scenarios described above and if the conditions exist, the Hospital has the right to act to obtain compensation for damages.

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08 September 2021

The Chairman  
Mariella Enoc  
[Signed illegible]



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# TRIBUNALE ORDINARIO DI ROMA

Ufficio Asseveramento Perizie e Traduzioni

## VERBALE DI GIURAMENTO

CRONOLOGICO

N. 6782-2

Addi 07/10/2021 avanti al sottoscritto Cancelliere è presente LA signor A

AGNESE DURANT

(~~iscritto~~/non iscritto all'Albo dei Consulenti Tecnici del Tribunale di \_\_\_\_\_)

dal ~~XXXXXXXXXX~~ identificato con documento CARTA DI IDENTITA'

n. AX 2387610 rilasciato da COMUNE DI ROMA

il 14/09/2015 permesso/carta di soggiorno n. \_\_\_\_\_ rilasciato da \_\_\_\_\_

il \_\_\_\_\_, il quale chiede di asseverare con giuramento

la traduzione dalla lingua ITALIANA alla lingua INGLESE

dei seguenti documenti CODICE ETICO

unito in ~~originale~~/copia conforme all'originale/fotocopia semplice:

Il Cancelliere, previa ammonizione sulla responsabilità penale (art. 483 c.p.) derivante da dichiarazioni mendaci, invita il comparente al giuramento, che egli presta ripetendo: "Giuro di avere bene e fedelmente adempiuto all'incarico affidatomi al solo scopo di far conoscere la verità".

Letto, confermato e sottoscritto. Agnese Durant



Il Cancelliere  
Silvana Rom

N.B. L'Ufficio non si assume alcuna responsabilità per quanto riguarda il contenuto e la regolarità formale del documento tradotto.