

CODE OF ETHICS

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Art. 1 È Introduction

Fondazione Musei Civici was established by the City of Venice in 2008 as a legal entity governed by private law, to manage the public heritage of Musei Civici.

It constitutes a complex museum system whose mission is the conservation, protection, management and promotion of the immense cultural and artistic heritage of its Collections and Museums.

Its crucial long term goal is the continued improvement of cultural and scientific programmes and the facilitation of decision-making, information and communication processes within the context of the relevant regulatory framework. Available resources - in broader concept of staff and financial resources - are managed according to a multi-unit system based on centralized management and programming in the coordination of the activities and projects promoted by the separate departments and museums.

This document is therefore part of a broader perspective of organizational improvement and increased transparency in the actions planned and implemented.

Art. 2 - General principles

This Code of Ethics (hereinafter, the *Code*) is the self-regulatory instrument for the Foundation and its employees with the purpose of guiding their decision-making processes and behaviour, in accordance with the principles outlined in the introduction. The Code is binding for all employees (and other subjects or entities in a similar capacity) of the Foundation as well as all subjects who entertain institutional, scientific, cultural and commercial relations with it.

Compliance with the provisions contained in the Code is an essential part of the contractual obligations of all employees of the Foundation. Any infringement of the Code's principles and contents may be considered as a violation of the primary obligations under the employment contract and/or a disciplinary offence and may entail legal consequences, including termination of employment and a claim for the damages that may arise out of the infringement.

Art. 3 È Scope

This Code applies to all employees, defined as individuals who have employment contracts or work in dependent self-employment, administrators, consultants, vendors or any other subject who in whatsoever capacity use the Foundation's name, act on its behalf and engage in relationships with third parties.

Art. 4 - Standards of conduct

The Foundation promotes and pursues standards of conduct based on fairness, loyalty, honesty, and respect for the individual and interpersonal relationships, rejecting any discrimination based on gender, race or political belief, and all forms of corruption in the form of private and individual interest associated with being part of the Foundation.

For these reasons, the Foundation is committed to communicating with its staff adopting a clear and understandable language, through Codes and Regulations that provide the main information regarding the life and operation of the museum network.

The Foundation promotes individual potential while respecting the roles, hierarchies and responsibilities attributed to each employee. Employees, without distinction or exception, shall conform their actions and conduct to the principles and contents of the Code, as part of their duties and responsibilities, in the knowledge that compliance with the Code is fundamental for the quality of their work and synonymous with professionalism.

Employees are required to comply with the provisions contained in the Regulations approved and applied by the Foundation - such as the Regulations for the simplified negotiated procedure for the procurement of goods, services or works, the Training Regulation, etc ., published on the Foundation's intranet - and any infringement thereof shall be sanctioned by the Foundation.

4.1 - Extramural activities and gifts

Any business activity conducted by the employees outside the workplace is not allowed if it could contrast with the tasks assigned to them by the Foundation so as to avoid that any decision or action may be considered vested and/or competitive, and may thus harm the reputation and image of the Foundation. For this reason, employees shall disclose any other professional relationship they may have with third parties where, even potentially, a conflict with the Foundation's interests may arise, and they shall abstain from taking part in the operational/decision-making processed in any way related.

Employees shall not pursue scientific research activities for private purposes, even in the absence of direct or indirect compensation or gain, through the use of the Foundation's equipment or resources. They may however obtain an exemption, by asking the appropriate authorization from the director of their department, who will consult with the Foundation's management before granting permission.

Any gifts, fees or other forms of material benefit must be declined, either for personal use or for third parties - except when of nominal value and received as part of normal business practice - as direct or indirect form of compensation for the performance of actions related to their position or duties. Supervisors and department directors are required to oversee the implementation of and ensure compliance with the foregoing provision.

4.2 Ë Safety

The Foundation is committed to fulfilling its legal obligations relating to health and safety at the workplace (e.g., Decree 81 of 2008 and subsequent amendments), investing in staff training and ensuring that work is performed in suitable premises. Employees agree to comply with the prescribed standards of conduct relating to health and safety at work.

4.3 Ë Communication

The Foundation shall establish external communications guidelines and strategies for the dissemination of information to the media or through any another channel, with the commitment of ensuring the information released is reliable, timely, and transparent. Relations with the media are reserved exclusively to the Foundation officers with functions and responsibilities delegated to them by the Board of Directors, and therefore each employee shall be subject to an obligation of strict confidentiality under the provisions set forth in this Code.

4.4 Ë Associations

The Foundation promotes the participation of individual employees in associations, initiatives, or external events if compatible with their working or professional activity. This includes participation in conferences, congresses, seminars, courses, and the drawing up of articles, papers and publications in general. Employees called upon to illustrate or provide any data and / or information to the public concerning objectives, activities, or results achieved by the Foundation, are required to obtain authorization from the Foundation's Management.

4.5 Ë Instrumentation

The Foundation makes available to its staff the instrumentation necessary for the performance of their ordinary activities. Employees are required to use the Foundation's equipment and assets responsibly, acting with reasonable care and due diligence. No employee shall make, or let others make, improper use of the assets and equipment property of the Foundation. In particular as regards the use of IT systems, employees shall ensure full compliance with the security standards set by the Foundation through the competent departments, avoiding any behaviour that might endanger the Foundation's computer network.

Art. 5 Ë Vendors and users

The Foundation is committed to establishing clear and correct relationships with its business partners, vendors and users. The Foundation is committed to maintaining a fair and open dialogue in line with good commercial practice. For the selection of vendors, the Foundation operates according to the general principles of national and EU tender (ITT) procedures and in

accordance with its own Regulations regarding the simplified negotiated procedure for the procurement of goods, services and works. Employees shall exercise their best efforts directing their actions to the achievement of maximum economy, efficiency and effectiveness. Resource management shall follow a logic of cost containment, without however compromising the quality of the results.

Vendors are required to be fully compliant with labour standards, human rights and the contractual conditions agreed. The compensation to be paid shall reflect the contractual sum agreed upon which shall be reasonable in relation to the contractual provisions. Users and vendors can submit reports for alleged infringement of the Code as provided for under Article 8 hereof.

The relevance of users' reports is significant because it allows the activation of investigative and accountability actions for the protection of the Foundation in addition to the periodic revision of the Code.

Art. 6 – Directors

Directors shall promote the knowledge and dissemination of the Code among their staff and shall oversee their conduct. Directors shall take into account any alleged infringement for the timely implementation of the relevant disciplinary proceedings and the individual assessment of the staff member involved.

With regard to monitoring compliance with the Code by Directors as well as the lack of vigilance on their part regarding the implementation and compliance of the Code by their staff, the issue shall be addressed directly by going to the next level of management who as a rule assigns their goals.

Art. 7 – Publication

The Code is available on the Foundation's intranet pages and the MUVE website. All Foundation employees are expected to be fully conversant with the principles and contents of the Foundation's Regulations and the procedures therein.

Art. 8 - Supervisory Board

A Supervisory Board shall be set up consisting of three employees from the different areas of activities of the Foundation's and sufficiently representative of the different areas of expertise and professional competences.

The Supervisory Board shall be chaired by the Director of the Foundation or the Executive Secretary.

Appointments to the Board shall be made by the Board of Directors and the term of office of the Board members shall be three years. No additional remuneration other than their regular salary shall be paid to the Supervisory Board members. The Board shall receive reports of alleged infringements, or other suggestions, promote compliance checks and investigate infringements, and communicate the closure of compliance check procedures to the

structure concerned. Information to the Board can be sent by e-mail to:
codice.etico@fmcvenezia.it

Art. 9 - Code review and update

The review and/or update of the Code, when necessary, shall be approved by the Board of Directors of the Foundation.

First approval: 19/12/2014