

SPD CODE OF ETHICS

This Code of Ethics is an official document of Scuola Politecnica di Design s.r.l. (hereinafter also referred to as the “School” or briefly as “SPD”) approved by the Sole Director and Director of the School itself, which gathers the principles and behavioural rules addressed to all the subjects operating in and with SPD. The purpose of this Code is to declare and disseminate the values and rules of conduct to which the School intends to make constant reference in the carrying out of its training activities.

FUNDAMENTAL PRINCIPLES OF INSPIRATION

Scuola Politecnica di Design requires its Professors, Employees, Suppliers and Students, as well as any other “bearer of interest” who carries out activities in the name and on behalf of the School to respect, protect and promote the fundamental values that inspire its educational activity, including:

- human dignity
- rejection of all unfair discrimination and support of merit, individual, and cultural diversity
- fairness, impartiality and loyal cooperation
- responsibilities and performance of duties towards the community
- honesty
- legality and transparency

RULES OF CONDUCT

In order to promote compliance with the above-mentioned principles by all the recipients of this Code of Ethics, the School has drawn up specific rules of conduct listed below:

Rejection of all unjust discrimination

The School rejects any behaviour that offends human dignity and leads to direct or indirect discrimination on grounds of religion, gender, sexual orientation, conscience, personal conviction, ethnic and social origin.

Sexual abuse and harassment

The School does not tolerate any abuse or harassment of sexual nature, intended as any discriminatory conduct detrimental to a person's sense of human dignity. Sexual abuse and harassment are considered to be all requests, attitudes or verbal expressions having as their object the personal sphere of sexuality addressed to a person, regardless of his/her gender or sexual orientation.

Opposing unlawful behaviour

The School undertakes to put in place all the necessary measures to prevent and avoid the commission of offences or conduct contrary to the Regulations in force. In particular, it prohibits the payment of money or any other form of corruption for the purpose of procuring direct or indirect advantages for the School itself.



It also prohibits its teachers and organisational staff from accepting gifts or favours from third parties that go beyond the normal rules of courtesy or hospitality. It also sensitises students, teachers and organisational staff to the utmost reciprocal correctness in the application of the School Regulations by mutually refraining from exerting undue pressure to obtain favouritism or vice versa, from producing biased decisions autonomously or as a result of conditioning, with particular reference to assessment and registration of attendance or other behaviour that has consequences on students' academic records.

Opposing conflicts of interest

The School does not allow its employees or collaborators to be involved in relationships that may lead to conflicts of interest with their organisational or teaching role, with particular reference to the exercise of the evaluation of students' educational performance assigned by the school to the teacher. This applies both in the event that an employee or collaborator pursues an interest other than the School's activity governed by its Regulations or personally benefits from it, and in the event that representatives of customers, suppliers or the Public Administration act in conflict with the duties associated with their position. Staff must not use their position in the company in such a way as to create a conflict between their own interests and the interests of SPD.

Intellectual property and plagiarism

Unless otherwise stipulated, all stakeholders are obliged to comply with the rules on intellectual property and plagiarism. The author of a project developed at School as part of a teaching workshop in collaboration with companies is obliged not to use it for private purposes and all authors involved must be named in the teaching activities carried out collectively. In view of the significance of the collaborations with partner companies during the teaching activities, the intellectual property of the elaborated projects is to be held in favour of the authors with pre-emption in the transfer of commercial exploitation rights in favour of the partner company, unless otherwise agreed. All stakeholders are required to maintain a collaborative and respectful conduct with respect to the organisational decisions made by the Management in the interests of efficiency, fairness, impartiality and honesty.

Confidentiality

All stakeholders involved in the development of educational projects in collaboration with companies or institutions are required to observe the strictest confidentiality in the management of sensitive information concerning technologies, processes, marketing information, and company strategies. This warning must also be adopted with regard to the projects themselves that are the subject of the collaboration, unless different and specific written agreements are taken with particular reference to the timeframe for the possible termination of the confidentiality obligation. This obligation shall survive even at the end of the project and until such time as the confidential information becomes public knowledge due to the responsibility of third parties.

Use of Scuola Politecnica di Design resources

All equipment, materials and spaces of the School must be used in a responsible and diligent manner so that expenses can be justified and appropriate documentation or accounts can be produced on request of the Management. It is not permitted to use or allow the use of spaces or equipment owned by the School for purposes other than teaching, unless otherwise agreed. The use of computers, applications and the network (wireless or wired) to exchange illegal material is also not tolerated: the exchange of copyrighted material (MP3, DivX or DVD films, commercial software, etc.) is prohibited by law and subject to criminal sanctions. If illegal actions are detected, SPD will proceed to formally reprimand the student and make all relevant documentation available to the authorities upon request.



Founded in 1954
in Milano

Compasso d'oro
award 1994

Ente accreditato dalla Regione Lombardia per i Servizi di Istruzione e Formazione
Numero Iscrizione all'Albo: 0629 – ID Operatore: 911068/2010
VAT 12581670960
CF 11705380159

MOD. 93
REV. 03 DEL 20/02/2023

Rules of conduct towards the Public Administration

Relations with the P.A. must be characterised by the utmost transparency and fairness. Relations with officials of the P.A. must be limited to those authorised by the School, in compliance with the law. The School undertakes to operate without any kind of discrimination through the P.A.'s communication channels, operating in a transparent, rigorous and consistent manner.

Personnel Management

In compliance with the Conventions of the International Labour Organisation and current legislation, the School undertakes to

- avoid any kind of discrimination against its staff;
- take care of the selection and recruitment of employees in compliance with the values of equal opportunities and equality in line with the Workers' Statute and the applicable CCNLs;
- ensure the privacy of the staff and their right to work without being subjected to unlawful influences
- undertake not to establish any employment relationship with persons without a residence permit or persons included in the reference lists (so-called Black Lists) and does not engage in any activity aimed at facilitating the illegal entry of illegal immigrants
- promote a culture of work safety and respect for the environment.

Working Environment

The School forbids:

- all behaviour attributable to the abuse of alcohol, drugs or other similar substances
- consuming or disposing of drugs in any capacity whatsoever
- possessing or exchanging through e-mail or other means pornographic, child pornographic material or even virtual images made using images of minors under the age of eighteen.

With regard to safety, the School promotes the training of its staff in safety and health. In particular:

- provides for the adoption of devices that effectively and promptly signal danger, and also takes care of the preparation of the evacuation plan
- periodically organises simulated emergency management tests to illustrate the behaviour to be adopted in the event of danger
- adopts first aid and emergency medical care plans
- periodically checks the suitability of the workplaces, ensuring that they comply with health and safety legislation.

The School asks all its employees and collaborators to be as helpful and cooperative as possible towards the Head of the Prevention and Protection Service (RSPP) and towards anyone who comes to carry out inspections and controls on behalf of the relevant bodies. All those who work for the School are responsible for the good management of and compliance with the procedures adopted on health and safety in the working environment.

Financial management and accounting

The School prohibits its employees from replacing or transferring money, goods or other benefits derived from illegal activities. To this end, the School and its employees shall never engage in or be involved in activities that involve the laundering (i.e. acceptance or processing) of proceeds from criminal activities in any form or manner.

The School asks its staff to verify in advance, available information (including commercial information) on business counterparties, customers and suppliers (making sure that they are not blacklisted and verifying that transactions are always carried out through authorised intermediaries with anti-money laundering controls and do not take place on numbered accounts).





The School, in preparing the financial statements and all other corporate communications required by law, observes:

- compliance with the relevant code and accounting rules in force
- the correctness and truthfulness of the company's assets and financial situation.

The control and observance of this Code of Ethics is entrusted to the Supervisory Board envisaged by the Organisation, Management and Control Model pursuant to Legislative Decree no. 231 of June 8, 2001, which will take care of proposing to the Sole Administrator any need or opportunity for updating based on the evolution of the laws and of the company and teaching activities. This Code of Ethics is available on the School's website and is posted on the notice board on the School's premises.



Founded in 1954
in Milano

Compasso d'oro
award 1994

Ente accreditato dalla Regione Lombardia per i Servizi di Istruzione e Formazione
Numero Iscrizione all'Albo: 0629 – ID Operatore: 911068/2010
VAT 12581670960
CF 11705380159

MOD. 93
REV. 03 DEL 20/02/2023