IED

CODE OF CONDUCT FOR PREVENTING AND COMBATING VIOLENCE, HARASSMENT AND DISCRIMINATION

Proposed by the Diversity and Gender Equality Steering Committee
Reviewed by the Human Resources Department and the Academic Department
Approved on 16 October 2026 by the Board of Directors of IED S.B.p.A.
Shared with the Trade Unions and the Student Councils

TABLE OF CONTENTS

1. PURPOSE AND SCOPE 3

2. LEGISLATIVE REFERENCES AND RELATED DOCUMENTS 3

3. GENERAL PRINCIPLES 3

4. DEFINITIONS 4

5. THE CONFIDENTIAL COUNSELLOR 6

6. PROCEDURES TO PROTECT VICTIMS OF VIOLENCE, HARASSMENT, DISCRIMINATION AND MOBBING 6

7. DUTY TO COOPERATE 7

8. CONFIDENTIALITY AND PROTECTION AGAINST RETALIATION 8

9. TRAINING AND INFORMATION 8

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1. PURPOSE AND SCOPE

This Code is a fundamental pillar of our commitment to ensuring a peaceful and safe study and working environment based on mutual respect and personal dignity.
The primary objective is to prevent and combat all forms of violence, harassment (sexual, psychological and digital), discrimination (based on sex, gender and sexual orientation, disability, health conditions, ethnic origin, nationality, language, age, political and trade union opinions, religious beliefs, as well as any other personal condition or characteristic protected by law or potentially liable to give rise to unjustifiably differential or degrading treatment), and mobbing.
All members of the IED Community (students, lecturers, staff and collaborators) are required to read this Code and comply with its provisions, actively contributing to the promotion of a culture of respect and proper conduct.
This Code applies to the entire IED Community and to anyone carrying out activities for or within the institution.
This Code also applies to all interactions taking place through technological tools, digital platforms and social networks, where such conduct has an impact on the study and working environment or on the dignity of members of the IED Community.

2. LEGISLATIVE REFERENCES AND RELATED DOCUMENTS

- Articles 2 and 3 of the Italian Constitution;
- Article 2087 of the Italian Civil Code;
- Law No. 240/2010 on the mandatory adoption of a Code of Ethics by Universities;
- Legislative Decree No. 198/2006 (Equal Opportunities Code);
- Legislative Decree No. 81/2008 (Consolidated Act on Safety);
- Guidelines on transparency and integrity under Law No. 190/2012;
- ILO Convention No. 190/2019 (ratified by Law No. 4/2021);
- European Commission Recommendation 92/131;
- European Parliament Resolution A3 – 0043/94;
- European Framework Agreement on Harassment and Violence at Work of 26.04.2007, implemented by the Interconfederal Agreement of 25.01.2016;
- EU Directive 1385/2024 on combating violence against women and domestic violence;
- UNI/PdR 125:2022;
- IED Code of Ethics in force;
- IED Student Disciplinary Regulations;
- Disciplinary provisions and procedures set out in the current National Collective Labour Agreements (CCNL) for employees of companies in the Tertiary, Distribution and Services sectors and the National Collective Labour Agreement (CCNL) for Executives in the Tertiary, Distribution and Services sectors, and in Article 7 of Law No. 300/1970.

3. GENERAL PRINCIPLES

IED recognises that safeguarding personal dignity is an essential condition for the expression of artistic and creative freedom, the pursuit of academic merit and the development of professionalism and cooperation at work.
IED guarantees the right of every member of the Community to a working and study environment based on well-being and respect for personal dignity and freedom.
To this end, the Institution prohibits and actively combats violence, harassment, discrimination, mobbing and any other conduct liable to harm physical or psychological integrity or create a discriminatory climate.
Such conduct is considered intolerable and is rigorously investigated and pursued, regardless of the role or position held by the person responsible, in accordance with the procedures laid down in the respective applicable rules (National Collective Labour Agreement for the Tertiary Sector, National Collective Labour Agreement for Executives in the Tertiary Sector, IED Disciplinary Regulations, Clauses of Collaboration Agreements).

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4. DEFINITIONS

1. Discrimination

Discrimination means any act or omission that violates the principle of equality among human beings, resulting in unequal treatment of a person or group on account of their membership of a particular category.

1a) Direct discrimination: occurs where, on grounds of religion, personal beliefs, physical condition, age or sexual orientation, a person is treated less favourably than another is, has been or would be treated in a comparable situation

1b) Indirect discrimination: occurs where an apparently neutral provision, criterion, practice, act, agreement or behaviour may put persons professing a particular religion or other ideology, persons with disabilities, persons of a particular age or persons of a particular sexual orientation at a particular disadvantage compared with other persons

2. Harassment

2a) Sexual harassment: sexual harassment is defined as any unwanted physical, verbal or non-verbal conduct of a sexual nature having the purpose or effect of violating a person's dignity and creating an intimidating, hostile, degrading, humiliating or offensive environment.
The existence of a relationship of hierarchical subordination, an imbalance of power or a position of disadvantage between the person responsible for the conduct and the victim constitutes an aggravating circumstance in sexual harassment.

Unwanted acts and behaviours constituting sexual harassment may include, by way of example only:

- Physical contact: any form of unwanted, bothersome or intrusive physical contact, or unwelcome and persistent intrusion into another person's physical space, understood as going beyond the bounds of ordinary courtesy and respect for privacy and personal dignity, even where there is no direct physical contact;
- Sexual blackmail (quid pro quo): explicit or implicit requests for sexual favours, accompanied by promises of advantages (grades, examinations, career advancement, opportunities), or threats of retaliation in the event of refusal;
- Gender-based harassment: any form of discrimination or humiliation based on sex, gender identity, gender expression or sexual orientation that makes the study or working environment hostile or degrading;
- Exhibitionist conduct and offensive material: exposing intimate body parts or performing acts of a sexual nature, displaying, sending or disseminating (including electronically or through social media, as further specified below under 2c) pornographic or vulgar material in the working or study environment, outside demonstrable and declared educational-creative/artistic purposes
- Acts of sexual violence

2b) Psychological harassment: psychological harassment means unwanted, hostile conduct, involving physical or psychological persecution, directed against an individual, which leads to a deterioration in working or study conditions and is liable to compromise the individual's health, professional standing or dignity.

Psychological harassment takes the form of behaviours, words, acts, gestures, writings, the display of images or other manifestations that cause offence to the person and are liable to create an environment or climate that is disrespectful, humiliating or harmful to the person's physical, psychological, moral or spiritual integrity.

Unwanted acts and behaviours constituting psychological harassment may include, by way of example only:

- harm to a person's reputation or professional standing: offensive remarks, slander, insults, disclosure of confidential information, insinuations about psychological or physical problems, or any other discrediting action that undermines the person's self-esteem, making them weak and vulnerable or the target of unfounded criticism
- comments considered offensive or discriminatory regarding a person's sexual orientation, ethnicity, language or religion, political or trade union opinions, or personal and social circumstances

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2c) Harassment and Discrimination in the Digital Environment (Cyber-mobbing and Cyber harassment)

The provisions of this Code also apply to conduct carried out through digital channels (social networks, messaging systems, e-mail, collaboration platforms) where at least one of the following circumstances applies:

- **Connection with the activity:** the conduct takes place within the Institute's official digital channels, through the use of company devices/platforms, or in communication groups created for educational, project or work purposes;
- **Impact on the working or study environment:** the conduct, although taking place on private profiles, devices, platforms or channels, has direct detrimental effects within the IED Community, making work hostile, intimidating or degrading for the victim, or impairing their participation in institutional activities;
- **Identifiability of the role:** the person responsible for the conduct or the victim can be identified as members of the IED Community, and the behaviour is closely related to the hierarchical, professional or academic relationship between the parties;

Specifically, the following are considered violations of this Code:

- *Cyberbullying and cyber-mobbing:* the systematic dissemination of offensive, derogatory or threatening messages through group chats (e.g. WhatsApp, Telegram), e-mail or social media, aimed at socially isolating a person or discrediting them professionally and academically.
- *doxing and breach of privacy:* the publication or threatened publication, without the data subject's consent, of personal data, images, videos or private conversations obtained in educational or work contexts, with the intention of causing harm or embarrassment:
- *digital sexual harassment:* sending unsolicited pornographic or sexually explicit material (so-called cyberflashing), making sexual comments under social media posts or profiles, or creating manipulated digital content (e.g. deepfakes) intended to violate a person's sexual dignity.
- *discriminatory digital exclusion:* the deliberate and unjustified exclusion of individual members from digital communication channels necessary for carrying out educational or work activities, based on prejudice or retaliatory purposes.
- *misuse of digital identity:* creating false profiles (impersonation) or taking over other people's accounts to send messages or carry out actions intended to damage the victim's reputation.

The use of personal devices or the fact that the conduct takes place outside the Institution's hours and physical premises does not preclude the application of this Code where the action has degrading effects on the affected person's professional or academic life within the Community.

3. Mobbing

Mobbing is defined as a set of persecutory practices, acts of harassment, or moral or psychological abuse perpetrated systematically, repeatedly and intentionally with the aim of isolating the victim in the workplace/study/research environment and/or permanently removing them from it, or otherwise preventing them from playing an active role in work/study/research.

The following behaviours are examples of mobbing:

- Behaviours that harm a person's reputation, such as offensive remarks, intimidation, threats, slander, insults, malicious insinuations concerning psychological or physical characteristics, health or private life, disclosure of confidential information, or any other action that systematically discredits the person; arbitrary restrictions on freedom of expression or physical/social isolation in the working or educational context;
- behaviours that harm professional standing, such as removal from assignments, withdrawal of delegated powers or transfers not justified by actual technical or production requirements and intended to persecute; unjustified threats of dismissal; systematic, continuous and unjustified undervaluation and criticism of work; deliberate exclusion from institutional communications or information flows necessary to perform work; the repeated, arbitrary and pretextual assignment of duties that diminish professional status or of workloads that are manifestly disproportionate to or inconsistent with professional or physical abilities, in the absence of substantiated and documented technical or production requirements, organisational needs or requirements to protect the company; unjustified harm to career advancement prospects; excessive monitoring or frequent and unjustified changes of duties intended to persecute and to cause demotivation and isolation;

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- Behaviours that harm a student's academic progress and dignity, such as systematic, destructive and unjustified criticism of the student's creative and intellectual abilities, especially when expressed publicly; educational obstruction, such as unjustified refusal to provide the assistance due or denial of access to necessary educational resources without technical or organisational reasons; unequal treatment in assessments based on personal or discriminatory prejudices rather than objective merit-based criteria; forced and discriminatory isolation through the deliberate exclusion of the student from group projects, productions and extracurricular activities relevant to their studies, based solely on prejudice or intended to punish the student for reasons unrelated to academic performance and unsupported by an adequate academic assessment; undermining merit by denying opportunities through the falsification or omission of the student's achievements, or systematic favouritism towards individuals who do not meet the prescribed minimum requirements; failure to observe the protections for DSA and BES through unjustified refusal or failure to apply the compensatory tools and exemption measures provided for in the Personalised Learning Plan (PDP) or in the certifications submitted; violation of the Alias Career through deliberate and repeated refusal to use the chosen name during classes, examinations or public or private interactions within the Institution; unjustified or intentional disclosure of sensitive data concerning diagnoses of specific learning disorders or special educational needs, or gender transition processes. Administrative and academic staff and teaching staff are bound by a duty of official confidentiality regarding such information, which must be handled in full compliance with EU Regulation 2016/679 (GDPR).

Decisions made by teaching staff and academic staff on the basis of technical and merit-based assessment criteria, consistent with course objectives and applied transparently, do not constitute mobbing or discrimination.

5. THE CONFIDENTIAL COUNSELLOR

The role of Confidential Counsellor is established to ensure the effective implementation of this Code.
The Board of Directors is responsible for the appointment and also determines the term of office.
The Confidential Counsellor is external to IED and must possess the experience and interpersonal and professional skills necessary to perform their duties. The appointment is for a fixed term and may be revoked in the event of serious omissions, delays or breaches of the duties of impartiality, proper conduct and confidentiality.
The Counsellor provides advice and assistance to any member of the IED Community who believes they are a victim of violence, harassment, discrimination or mobbing, intervening to help resolve the case. The Counsellor also performs a preventive role in relation to distress in the working and study environment, identifying any critical issues and proposing appropriate measures to address them.
The Counsellor acts with full autonomy and submits an annual report on their activities to IED's Board of Directors and the Diversity and Gender Equality Steering Committee, containing aggregated and strictly anonymised data on: the number of cases handled; the types of conduct reported; the main measures implemented; and any recommendations for prevention.

6. PROCEDURES TO PROTECT VICTIMS OF VIOLENCE, HARASSMENT, DISCRIMINATION AND MOBBING

Anyone who believes they are a victim of conduct contrary to this Code, in particular violence, harassment, discrimination or mobbing, may contact the Confidential Counsellor to identify the most appropriate procedures for resolving the situation.
IED ensures that the Counsellor has a suitable room available for meetings, guaranteeing the utmost discretion; meetings may in any case also be held by videoconference at the parties' discretion.
The Confidential Counsellor can be contacted at the dedicated e-mail address: **consiglieredifiducia@ied.it** and will take charge of the case within 48 hours.

Informal Procedure

A person subjected to conduct contrary to the Code of Ethics or the Code of Conduct may request the intervention of the Confidential Counsellor to attempt, where possible and advisable, an amicable resolution,

The Confidential Counsellor may, always with the express consent of the reporting person:

- obtain testimony/documentation: the persons and/or offices consulted shall make themselves fully available to cooperate with the Counsellor and to provide the information and/or documentation requested;
- moderate and supervise discussions between the parties, where the case allows;
- summon the person identified as responsible for the harmful conduct, hear their account, explain why the conduct is inappropriate, in breach of the Code of Conduct or even unlawful, order its immediate cessation and formally warn against its repetition;

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- suggest involving external parties (local services, Anti-Violence Centres, Judicial Authorities, Equality Counsellor, etc.);
- propose organisational measures to IED that may help resolve the case or restore/improve the well-being of the persons involved;
- support internal bodies in promoting a safe and respectful working environment by proposing training activities and targeted initiatives.

Within the informal procedure, the Confidential Counsellor may preserve the reporting person's anonymity, unless disclosure of their identity is essential to a more effective resolution of the case and, in any event, in agreement with that person.

The report may be withdrawn at any stage of the informal procedure. In this case, the Counsellor will discontinue handling the case.

Formal Procedure

Where the Informal Procedure is not considered appropriate, has not produced satisfactory results, or the victim so prefers, the Formal Procedure may be used, with assistance from the Confidential Counsellor, if requested, in preparing a written submission (a so-called "formal report") describing the facts in detail and requesting an assessment for disciplinary purposes.

The submission shall be addressed:

- ➔ to the Campus Director, where the person responsible for the conduct is a student;
- ➔ to the Human Resources Department, where the person responsible for the conduct is a lecturer;
- ➔ to the Human Resources Department, where the person responsible for the conduct is an employee;
- ➔ to the Chief Executive Officer, where the person responsible for the conduct is a member of the Human Resources Department or a Campus Director.

Upon receiving the report, either directly from the person concerned or from the expressly authorised Confidential Counsellor, the competent bodies shall promptly initiate a formal investigation to establish the facts, in accordance with their respective applicable rules. The investigation shall be conducted in accordance with the principles of impartiality, confidentiality and the right of all parties to be heard.
The Confidential Counsellor may, where appropriate, be consulted during hearings before the disciplinary bodies.
During the investigation, IED may, where necessary and as a precaution, adopt temporary measures aimed at suspending contact between the reporting person and the person allegedly responsible for the conduct, in order to ensure a peaceful and safe study and working environment.

7. DUTY TO COOPERATE

Every member of the IED Community contributes to ensuring a working and study environment based on respect for the dignity of others by reporting to the Confidential Counsellor any irregularities or inappropriate conduct of which they believe they are a victim.
Where a report is made, all members of the community have a duty to cooperate honestly and in good faith if called upon to provide testimony or information as part of internal fact-finding procedures.
Withholding information or knowingly providing false information are themselves violations of this Code and are subject to investigation and sanctions.

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8. CONFIDENTIALITY AND PROTECTION AGAINST RETALIATION

Every member of the IED Community contributes to ensuring a working and study environment based on respect for the dignity of others by reporting to the Confidential Counsellor any irregularities or inappropriate conduct of which they believe they are a victim.
Where a report is made, all members of the community have a duty to cooperate honestly and in good faith if called upon to provide testimony or information as part of internal fact-finding procedures.
Withholding information or knowingly providing false information are themselves violations of this Code and are subject to investigation and sanctions.

9. TRAINING AND INFORMATION

IED undertakes to disseminate this Code as widely as possible through appropriate communication, training and awareness-raising activities, and to make the Confidential Counsellor's name and contact details known.

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