



**CODE OF CONDUCT
FOR THE FIGHT AGAINST ACTS AND BEHAVIORS HARMFUL
TO THE DIGNITY OF STAFF MEMBERS**

Approved by Resolution of the Administrative Council No. 91-2024 of 25 November 2024

Article 1

Scope

This Code applies to all personnel who, in any capacity, serve within CREA and to all those who operate for the Entity or maintain relationships of any kind with it. The principles contained in this Code apply throughout the entire professional career, from recruitment to retirement.¶Every employee of CREA has the obligation to respect the principles contained in this Code, in order to guarantee a working environment based on the protection of individual dignity and fairness in interpersonal relationships. The governing bodies promote a culture of respect and verify its actual implementation.

Article 2

Principles and Purposes

1. By adopting this Code, CREA intends to:¶– Guarantee equal opportunities among all workers, encouraging the adoption of organizational decisions and behaviors inspired by the principles of fairness, respect, cooperation, and correctness;¶– Prevent any form of discrimination harmful to personal dignity and promote organizational well-being;¶– Make use of timely and impartial procedures to stop any verified episode of discrimination, sexual harassment, moral and/or psychological violence;¶– Guarantee to those who report violations of this Code the right to confidentiality and protection from direct and indirect retaliation;¶– Disseminate knowledge of the functions and areas of responsibility of the Trusted Advisor;¶– Identify the parties involved and their respective roles within the scope of the prevention and contrast of harmful conduct governed by the Code;¶– Inform all CREA staff of their rights and obligations regarding the prevention and ending of any discriminatory behavior and the maintenance of a work environment that ensures respect for everyone’s dignity;¶– Recognize the right of workers to report acts or behaviors harmful to their dignity suffered in the workplace;¶– Inhibit and prosecute domineering or persecutory behaviors causing discomfort and psychophysical distress in the worker.
2. All staff members have the duty to cooperate, also in relation to their hierarchical position within CREA, in maintaining a working environment as described above. No one is allowed to take advantage of their position to eliminate or reduce the guarantees provided by this Code.

Article 3

Right/Duty of cooperation

1. All staff members are obliged to cooperate to guarantee a working environment respectful of people’s dignity and have the right to expect the same treatment from others.
2. All managers and/or coordinators have the duty to promote the conditions that allow each worker to operate with integrity, honesty, professionalism, and, in particular, to prevent the occurrence of discrimination, acts, and behaviors, including harassment and sexual harassment, moral or psychological violence, harmful to personal dignity, and to support the person who wishes to react.

Article 4

Trusted Advisor

1. **Establishment.** The position of Trusted Advisor is established, as provided for by the European Parliament Resolution A3-0043/94, hereinafter referred to as “Advisor”, and the CREA guarantees its commitment to support any employee who makes use of the Advisor’s intervention or who files a complaint concerning episodes detrimental to dignity, providing clear and comprehensive indications regarding the procedure to be followed, maintaining confidentiality, and preventing any possible retaliation. Similar guarantees are extended to any witnesses.

2. **Activities.** The Advisor, introduced by European legislation, is the expert figure responsible for listening, managing, and providing assistance in critical situations covered by this Code. The Advisor provides counseling and assistance to personnel who are the subject of episodes detrimental to dignity in order to contribute to the resolution of the case. In particular, the Advisor:
- ¶– Takes on the case only at the request of the injured party, who has the right to withdraw at any time;
 - ¶– Informs the requestor, according to the relevance and seriousness of the reported facts, about the possible forms of protection provided by the legal system;
 - ¶– Acquires the necessary information for handling and evaluating the case, respecting the rights of the parties involved;
 - ¶– Suggests measures and initiatives aimed at pursuing conciliatory solutions between the parties involved;
 - ¶– Plays a mediating role between the Administration and the person who, in any capacity, works within the Entity, acting in the interest of both;
 - ¶– Receives and examines reports from staff members who, among others, are also conveyed through the CUG (Joint Committee for Equal Opportunities);
 - ¶– Relates, where necessary, with those responsible for the protection of health and safety in the workplace, with the CUG, or with other internal parties in charge of countering any form of direct or indirect violence or discrimination in the workplace;
 - ¶– Undertakes any initiative only with the prior consent of the person;
 - ¶– May be invited to participate in CUG meetings, in the capacity of expert without voting rights;
 - ¶– Reports annually to the CUG and to the General Directorate on the activities carried out and on the existence of working conditions or organizational or managerial factors that may give rise to discriminatory situations or moral and/or psychological violence, in order to facilitate the Committee's intervention also in the preparation of positive actions.

Furthermore, the Advisor, in agreement with the CUG, promotes prevention, information, training, and awareness-raising actions for workers aimed at preventing discrimination and harassment and fostering the well-being of the people working in CREA.

3. **Appointment and assignment.** The Advisor is appointed by the Director General and selected among CREA's internal staff, following the issuance of a specific call for applications, among individuals who do not hold "managerial or governance" positions, and after the identification of cultural and professional requirements, as well as the verification of the necessary qualities of independence and impartiality of the designated person. Due to the specificity of the role, the Advisor, having full freedom of movement, also ensures, including by telematic means, the exercise of his/her functions throughout the national territory under CREA's competence; should it be deemed appropriate, the Entity may appoint a Deputy Advisor. The Administration ensures and guarantees the Advisor the means and tools necessary to perform his/her functions while safeguarding the neutrality of the role. The Advisor operates in full autonomy and carries out his/her assignment with confidentiality, not disclosing to third parties any information of which he/she becomes aware in the course of performing the role, not even after its termination. In performing the assignment, the Advisor is considered in active service in all respects, does not receive additional remuneration, serves a three-year term, with the possibility of renewal for the same duration, provided that he/she is deemed the most suitable for the role also in light of the activities already carried out.

The appointment is revoked, also upon a reasoned proposal by the CUG, in cases of serious non-fulfillment, omissions, delays and/or violations of the obligations of impartiality, fairness, and confidentiality; in cases of impediment or conflict of interest of the principal Advisor, the related functions are carried out ad interim by the Deputy Advisor.

The name and contact details of the Trusted Advisor are published on the Entity's website in the section dedicated to the CUG.

Procedures to be adopted in case of episodes detrimental to the worker's dignity

Article 5 Informal procedure

The staff member who feels to be suffering a violation may contact the Trusted Advisor, who, therefore, acts only upon a report from the employee. The Trusted Advisor cannot initiate any action without the prior express consent of the interested party.

1. The Trusted Advisor, at the request of the employee, in order to obtain the interruption of unwanted behavior and to foster the overcoming of the distressing situation, may:
2. a) Examine the situation and advise on the most appropriate ways to resolve the case;
3. b) Hold a confidential interview with the alleged perpetrator of the reported harassing behavior;
4. c) Acquire any testimonies and access any administrative documents related to the case under examination;
5. d) Propose mediation meetings for conciliatory purposes between the injured party and the perpetrator of the harassment;
6. e) In the most serious cases, advise the competent manager on the actions or possible measures to be taken to resolve the situation, including the relocation of one of the parties involved, subject to the needs of the injured party;
7.) Suggest any actions deemed appropriate to ensure a working environment respectful of the freedom and dignity of the personnel involved in the case.
8. Once initiated, the informal procedure may be interrupted at any time, should the interested party withdraw his/her report.
9. The informal procedure must be concluded within a reasonably short period and in any case no later than 60 days from the presentation of the case.
10. The Trusted Advisor, ensuring the necessary confidentiality, where deemed appropriate or in all cases where disciplinary aspects are also detected, drafts a report for the CUG and for CREA Management, also describing the atmosphere observed during the handling of the case.
11. Should the results obtain from the informal procedure not be deemed satisfactory by the interested party, the Trusted Advisor may suggest the initiation of the formal procedure referred to in Art. 6.

Article 6 Formal procedure

Where the interested party does not wish to resort to the intervention of the Trusted Advisor or, if after such intervention the unwanted behavior persists, he/she may file a formal complaint, with the assistance of the Advisor, with the Head or Manager of their Office, who shall be required to forward the complaint to the Office for Disciplinary Proceedings of the Entity, without prejudice, in any case, to any other form of judicial protection available.

1. The formal procedure, always initiated at the request of the staff member in question, must be concluded within a maximum of 90 days.
2. In disciplinary proceedings relating to the matters covered by this Code, the Office responsible for Disciplinary Proceedings may, where deemed appropriate, hear the Trusted Advisor as a person informed of the facts.
3. CREA, even pending the disciplinary proceeding, ensures adequate protection for the person offended by forms of retaliation or penalization and ensures that the harmful behaviors against

them cease, adopting, also at the request of one of the parties, any transfer measures in order to restore a calm working atmosphere.

4. In the event that the proceeding concludes with the adoption of a disciplinary measure, CREA reserves the right to revoke all assignments conferred.
5. In the event, however, that the complaint, following the procedure provided for in this article, proves to be unfounded, CREA adopts the most suitable measures for the protection of the dignity and honorability of the person indicated as the perpetrator of the harmful acts, subject to his/her express favorable opinion, and reserves the right to initiate possible disciplinary actions against the reporting employee.

Article 7

Awareness-raising and dissemination

CREA undertakes to make known to all its employees the present Code of Conduct, also in cooperation with the trade unions. The Advisor, together with the Joint Committee for Equal Opportunities (CUG), will present an annual report on the developments of the Code.

Article 8

Confidentiality

All parties involved in this Code are required to maintain confidentiality regarding facts and information acquired during the handling of cases, in compliance with current privacy legislation. The Entity is required to protect those who have been harmed from retaliation and reprisals. This right to protection also extends to those who have witnessed such behaviors.

Article 9

Amendments and updates to the Code

The CUG periodically verifies the outcomes achieved with the adoption of this Code, submitting to the Director General any amendments or additions deemed necessary, also following the issuance of new national or European regulations in the matters covered by this Code.

Article 10

Final provisions and entry into force of the Code

This Code enters into force upon its adoption by CREA and will be published on the institutional website.