

CODE OF ETHICS AND CONDUCT

TETHYS RESEARCH INSTITUTE

8th of April 2026

Preamble

The Code of Ethics and Conduct of the Tethys Research Institute ETS (hereinafter Tethys) establishes the set of rights, duties, and ethical and social responsibilities of all those who, in various capacities, participate in the life of the Institute and collaborate in its activities.

The application and compliance with this Code (hereinafter “the Code”) by all individuals and entities involved is considered an essential requirement for the implementation of any activity: governing bodies, members, employees, assistants, volunteers, and consultants.

The Code also defines the rules governing relations with third parties, including beneficiaries, partners, suppliers, funding bodies and donors, media, auditing entities, and stakeholders. Tethys ensures the dissemination and awareness of the Code, with the aim and commitment to preventing non-compliant behaviour by both direct and indirect collaborators.

Through this Code, Tethys aims not only to prevent discrimination, mobbing, and harassment, but also to promote self-education and training in ethical behaviour in workplace relationships, in full compliance with constitutional principles of equality, equal opportunities, and the protection of personal dignity and labour.

Principles and Objectives

This Code serves as a tool to promote transparency and combat direct and indirect discrimination, sexual and moral harassment, and mobbing. It aims to create a safe, respectful, and positive work environment that supports interpersonal relationships, promotes employee well-being, and prevents risks to health and safety, including work-related stress.

In particular, the Institute is committed to:

- Ensuring protection for all individuals working with Tethys from any behaviour that harms interpersonal relationships or results in discrimination based on gender, ethnicity, religion, personal beliefs, disability, age, or sexual orientation
- Removing obstacles to maintaining a work environment where mutual respect for dignity and personal integrity is upheld

- Preventing abusive or oppressive behaviours that may cause psychological or physical distress

All members and collaborators, regardless of their hierarchical position, are committed to maintaining such a work environment.

No one is allowed to abuse their position to undermine the guarantees provided by this Code.

Ethical Conduct Standards

Legality

All members, collaborators, and anyone acting on behalf of Tethys must comply with the principle of legality and adhere to applicable laws and regulations in Italy, the European Union, and all countries where Tethys operates.

The same principle applies to all organisations, companies, and institutions with which Tethys collaborates.

Honesty, Loyalty, and Fairness

These are fundamental principles governing both internal operations and external relations of Tethys and must guide the behaviour of all individuals acting on behalf of the Institute.

Right/Duty of Cooperation

Members and collaborators have both the right and duty to contribute to a work environment that respects personal dignity. Tethys guarantees the protection of these rights in accordance with applicable legislation. All collaborators are ethically responsible for their behaviour and aware that they represent Tethys through their actions.

Managers and coordinators must promote conditions that allow all individuals to act with integrity, honesty, and professionalism, and must prevent discrimination, harassment (including sexual harassment), and any behaviour that undermines dignity.

Impartiality and Conflicts of Interest

Decisions must be made solely in the interest of Tethys and its objectives, based on objective and verifiable criteria, and not influenced by personal gain. All individuals must avoid situations that could create conflicts of interest. Any actual or potential conflict must be reported to project managers, the Board of Directors, or the Board of Arbitrators.

Health and Safety Protection

Tethys complies with workplace safety regulations in all countries where it operates.

Use of Assets and Resources

Personnel must ensure the protection and proper use of both tangible and intangible assets belonging to Tethys. These resources must be used exclusively for authorised institutional purposes.

Use and Protection of Personal Data

Tethys ensures confidentiality and protection of personal data in compliance with applicable privacy laws. Personnel must not disclose confidential technical, organisational, or financial information unless required by law or internal regulations.

Protection of Intellectual Property

Scientific research is a fundamental asset of Tethys. All individuals must contribute to its development, protection, promotion, and dissemination.

Political Pluralism

Tethys respects the political freedom of its members and collaborators but requires behaviour that preserves its neutrality as a non-partisan and non-denominational organisation.

Environmental Protection

Tethys promotes environmentally sustainable practices within its organisation and among its partners, aiming to reduce CO₂ emissions and environmental impact.

Partners are required to comply with national and international environmental standards.

Use of Alcohol and Drugs

It is strictly prohibited to work under the influence of drugs, alcohol, or psychotropic substances. Such substances are not permitted in Tethys facilities.

Equal Opportunities and Treatment

Tethys guarantees equal treatment and non-discrimination in all activities, regardless of gender, age, ethnicity, nationality, religion, sexual orientation, or disability. All individuals must act objectively and avoid favouritism.

Respect for Personal Integrity

Tethys requires respect for the dignity and physical and psychological integrity of all individuals. No one may be subjected to violence, coercion, threats, abuse of power, or exploitation. Tethys is committed to preventing psychological harassment and abusive conduct.

Relations with Third Parties

Within the scope of its activities, Tethys establishes collaborative relationships and partnerships with international, national, and local partners, both public and private. Tethys selects its partners based on their sharing and acceptance of the principles, rules, and mission of Tethys as set out in this Code.

By recognising the reputation and standing of the Tethys name, partners undertake to use the name/logo in their institutional communication and not to claim any rights to its use beyond what is established in the relevant agreements.

Tethys refuses to collaborate with partners involved in criminal proceedings for serious environmental crimes, corruption, mafia-type criminal association, or other forms of illegality incompatible with the Institute's values and mission.

For the implementation of its projects and activities, Tethys establishes relationships and commitments with various public and private funders (or donors), which must be based on fairness and transparency.

Private companies wishing to support projects or initiatives promoted by Tethys are required to respect human rights, labour rights, and environmental protection, preferably demonstrated through corporate social responsibility practices or internationally recognised certifications.

Tethys refuses donations, whether in-kind or financial, from companies that produce or trade materials considered harmful to human dignity or the environment, or that are involved in criminal proceedings for serious environmental crimes, corruption, mafia-type criminal association, or other forms of illegality incompatible with the values and mission of Tethys.

In the procurement of goods, materials, equipment, or services, Tethys gives preference to qualified operators in the sector, where economically competitive.

Knowledge and acceptance of this Code by suppliers is a condition for entering into any contract.

External communications of the organisation must be truthful, complete, accurate, and verifiable. Where it is necessary to provide external information regarding Tethys' objectives, results, or positions, collaborators are required to obtain authorisation from their project manager and agree on the content with the designated persons.

Participation, in the name of or on behalf of Tethys, in committees, networks, campaigns, or third-party associations of any kind must be formally authorised in writing by the Board of Directors.

Relations with auditing bodies must be conducted in accordance with principles of integrity, timeliness, fairness, and transparency. All staff are required to provide full cooperation. It is therefore prohibited to conceal information, provide false or misleading documentation, or in any way hinder or obstruct auditing or control activities.

Amendments to the Code

1. Amendments are approved by the Board of Directors upon proposal.
2. Tethys periodically reviews the Code and updates it as necessary.

Entry into Force and Publication

This Code enters into force upon approval by the Board of Directors and is published on the Tethys website: www.tethys.org.

APPENDIX

Definitions of Discrimination

- a) **Direct discrimination** occurs when a person is treated less favourably than another person is, has been, or would be treated in a comparable situation, on the grounds of gender, race or ethnic origin, religion or personal beliefs, disability, age, or sexual orientation.
- b) **Indirect discrimination** refers to a situation in which an apparently neutral provision, practice, criterion, act, agreement, or behaviour places, or may place, members and collaborators at a particular disadvantage, unless such measures are objectively justified by a legitimate aim.

Definition and Types of Harassment

1. **Harassment** occurs when unwanted conduct takes place, related to discrimination risk factors, with the purpose and/or effect of violating a person's dignity and creating an intimidating, hostile, degrading, humiliating, and/or offensive working environment.
2. **Sexual harassment** occurs when any act and/or behaviour of a sexual nature, or otherwise based on sex, expressed in verbal, non-verbal, or physical form, is unwanted and, either in itself or due to its persistence, violates the dignity and freedom of the person subjected to it, constitutes an abuse of authority, or is capable of creating an intimidating, hostile, or humiliating working environment. It also includes any act or coercive behaviour aimed at

obtaining sexual favours in exchange for maintaining employment or for advantages related to career advancement, working hours, remuneration, or other aspects of working life.

In particular, the following behaviours fall within the category of sexual harassment:

- explicit or implicit requests for sexual favours or unwelcome sexual attention considered inappropriate or offensive by the recipient;
- threats, discrimination, or blackmail suffered as a result of rejecting sexual advances, which may directly or indirectly affect the establishment, performance, or termination of employment, as well as career progression;
- unwanted physical contact;
- written or verbal expressions that are degrading or offensive toward a person based on their sex or on differences in the expression of sexuality;
- suggestive or ambiguous communications, gestures, or advances of a sexual nature that are unwelcome;
- references to a person's private sexual life or the dissemination of false or true information regarding a person's sexual life.

The essential characteristic of sexual abuse lies in the fact that it is an unwanted act from the perspective of the person subjected to it. Acts constituting sexual harassment may be perpetrated by individuals of the same or opposite sex.

Consensual physical contact occurring in the workplace does not fall within the definition of sexual harassment; such situations are addressed under the Code of Conduct for Public Employees (Presidential Decree No. 62 of April 16, 2013).

3. **Moral harassment** occurs when repeated hostile behaviours are directed against an individual, with physically or psychologically persecutory intent, and are capable of creating an environment that is disrespectful, humiliating, or harmful to the person's physical and psychological integrity or dignity. Gender discrimination, as well as discrimination based on ethnic origin or political or religious beliefs, may also constitute moral harassment.

Examples of moral harassment include:

- damage to a person's reputation, such as insults, intimidation, slander, offensive remarks, jokes or inappropriate comments, degrading or derisive remarks, veiled threats, dissemination of confidential information, insinuations regarding psychological or physical issues, and any other actions aimed at discrediting the individual, including reprimands when delivered in the manner described above;

- damage to an individual's professional standing, such as wage discrimination, prejudice to opportunities for inclusion in the Institute's organisational structure, unjustified removal from assigned roles, assignment of inappropriate tasks, or actions that create demotivation or undermine confidence, discouraging the continuation of their work;
 - attempts at marginalisation and isolation
4. **Stalking.** This includes repeated conduct, threats, or harassment aimed at causing a persistent and serious state of anxiety or fear, or at generating a well-founded fear for one's own safety or that of a close relative or a person with whom one has an emotional relationship, or at forcing the individual to alter their normal way of life.

By way of example, and not exhaustively, such conduct may occur in the workplace through:

- letters, notes, or persistent phone calls;
 - repeated verbal or written communications of a sexual nature, including through digital means;
 - loitering at the workplace and intrusions into the individual's private life.
5. **Mobbing.** Among forms of moral harassment, mobbing is a type of moral or psychological violence within the workplace, carried out by superiors and/or groups of colleagues against a collaborator. It is characterised by a series of acts, attitudes, or behaviours that are diverse but repeated over time in a systematic and habitual manner, with aggressive, denigrating, or vexatious connotations, such as to cause work-related distress capable of undermining the health, professional standing, and dignity of the employee, potentially leading to their isolation or exclusion from the workplace.

Such attitudes and behaviours are often intentional and seriously affect the psychological balance of the member or collaborator, reducing their work capacity and self-confidence, and causing stress, emotional problems, depression, or other disorders.

For illustrative and non-exhaustive purposes, conditions and behaviours that may characterise situations of **emotional mobbing** or **strategic mobbing** can be distinguished.

a. Emotional mobbing

Emotional mobbing most frequently occurs between a superior and a subordinate (vertical mobbing), and more rarely from subordinate to superior; when it occurs among colleagues, it is referred to as horizontal mobbing.

In any case, emotional mobbing manifests through actions such as:

- offensive isolation of the member or collaborator, or acts of obstruction or contempt, even in front of other staff or external parties;
- unjustified removal, whether permanent or temporary, from the workplace or from assigned duties/functions;
- deliberate withholding of work-related information, or dissemination of incorrect, incomplete, or insufficient information;
- systematic rejection of all proposals made by the member or collaborator regarding the organisation of their work;
- vexatious actions targeting the individual's personal characteristics, including discrimination based on sex, race, language, or religion;
- exaggerated or inappropriate criticism, slander, or defamation concerning the performance of work activities;
- threats, intimidation, humiliation, insults, offensive language, or deliberately hostile behaviour;
- sabotage or deliberate obstruction of the execution of tasks assigned by a project manager;
- unjustified and/or systematic refusal to comply with legitimate instructions issued by a project manager.

b. Strategic mobbing

Strategic mobbing consists in the marginalisation of a member or collaborator from work activities with the aim of excluding them from the work process and depriving them of their duties or functions.

It is primarily manifested through actions such as:

- stripping of duties and/or responsibilities;
- repeated and unjustified changes in tasks and assignments;
- failure to assign tasks or responsibilities;
- prolonged assignment of demeaning tasks or tasks that are excessive or disproportionate relative to the individual's professional profile;
- systematic and structural obstruction of access to information necessary for the proper performance of technical, scientific, and administrative activities.