

The Decree-law 231/2001 introduced in the Italian legal system the regime of **administrative liability** of entities (i.e. companies) for certain **crimes** committed internally according to very specific criteria. We speak of *administrative liability* referring to the possibility that a company is liable for the commission of a crime with its own assets, while we speak of *criminal liability* in the event that a natural person connected to the company is responsible for the crime committed. The offenses covered by Legislative Decree 231/2001 are numerous and constantly updated, they concern among other things fraud, extortion, falsification, receiving stolen goods and many others.

The Decree-law 231/2001 addresses to the adoption and effective implementation of organizational models suitable for preventing the commission of offenses: Collegio San Carlo has consequently adopted an Organizational Control Model (MOC) aimed at the surveillance and prevention of crimes. To ensure its effective implementation, it is essential to inform and train all the employees and collaborators of Collegio, at all levels, on its contents, and the Supervisory Body (OdV) has therefore prepared, with the supervision and approval of the Management of Collegio, a short but accurate (bilingual) presentation in February 2020.

The presentation, prepared in PowerPoint and accompanied by an audio/video presentation via VIMEO, was distributed to employees¹ on Monday 8 June 2020, and in order to verify the effectiveness of the training, the compilation of a multiple-choice questionnaire was requested. The outcome of the questionnaire is commented later in this report, the purpose of which is to inform all the participants from a statistical point of view and not from an individual point of view.

The presentation prepared for training purposes and the related questionnaire had an excellent follow-up (albeit with some suggestions for improvement, however isolated): at the end of this report there is a table summarizing the answers to the questionnaire, divided into correct (OK) and non-correct (NOK). Both the spirit of the Decree and the purpose of the organization adopted at Collegio San Carlo have been correctly understood. In particular:

- In 7 out of 11 questions (64% of cases) the percentage of correct answers is 97% or greater

¹ Including ProEdu and San Carlo Sport

- In 10 out of 11 questions (91% of cases) the percentage of correct answers is 80% or greater
- In one case only there is a high percentage of incorrect answers; question 11 was misleading, we report here its text:

11. The Supervisory Board (Organismo di Vigilanza):

- Is subject to directives of the top management, which define the actions required to properly monitor the application and the efficiency the OCM
- Is given independent authority to properly monitor the application and the efficiency of the OCM
- Is directly accountable to the judicial authority for topics related with Decree-Law 231/2001

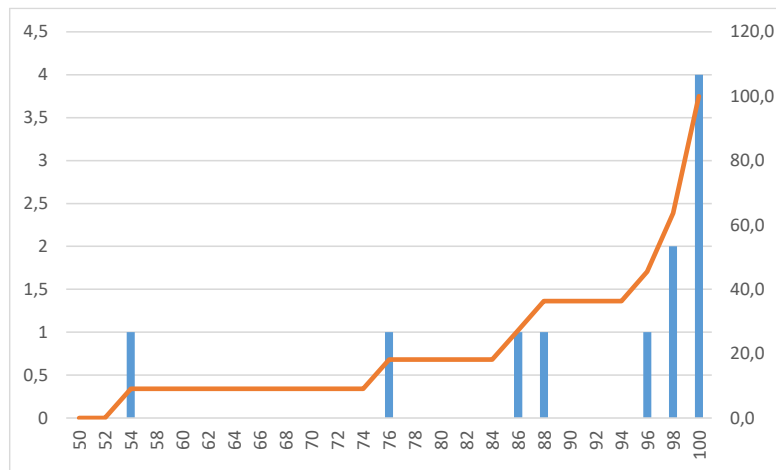
About 45% of participants gave the wrong answer, however showing an overestimation of the role of the Body. However, it can be argued that, overall, the importance and content of Decree-law 231/2001, as well as the implementation of the Organization and Control Model, the adoption of the Ethics Code and the activation of the Supervisory Body with its contact methods, have been well understood.

With the support of the Personnel Department, a procedure has been activated that will allow the training (remotely), and subsequent evaluation via the questionnaire, to be provided to all new employees of the San Carlo College. Any changes or modifications made to the system of Decree-law 231/2001 will be promptly communicated to all the employees.

Summary table

Question	OK	NOK	% OK/NOK
1	273	11	96,1
2	273	12	95,8
3	279	4	98,6
4	284	0	100,0
5	215	68	76,0
6	243	41	85,6
7	276	9	96,8
8	244	39	86,2
9	279	4	98,6
10	284	2	99,3
11	149	135	52,5

The same results are also shown in the following graph.



Revisions

N.ro	Date	Changes
01	12/10/2020	1 st emission