

Sustainability Policy



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1. Introduction

1.1 Objectives

The present Sustainability Policy (the "Policy") identifies the commitment and approach of the Banca Popolare di Sondrio Group (the "Group") to maximize the creation of shared value over the long term through sustainable development from an economic, environmental and social perspective.

Since its foundation, the Group has oriented its activities toward the satisfaction of the different stakeholders' interests, inspiring its actions to the values of mutuality, ethics, and reciprocity, associating the traditional purpose of pursuing profits with the identity purpose of realizing a common benefit.

In this perspective, based on scenarios that bring together environment, industry and finance, the Group proceeds, with a holistic approach and a willingness to be an agent of change, on the path already undertaken of identification, implementation and monitoring sustainability goals, implementing the most appropriate ways to achieve them in its own context and within the system where it operates.

This document defines the general principles followed by the Group in the implementation of Environmental, Social and Governance ("ESG", *i.e.* Environmental, Social and Governance) factors and sets out the guidelines implemented, time by time, in the Business Plan. Consistently with new European regulations in the field of "sustainable finance" and market trends on these issues, awareness and commitment to update strategies and develop new processes are constantly increasing, with the aim of continuously and progressively integrating sustainability into the company. In this respect, the Business Plan, available on the institutional website of Banca Popolare di Sondrio SpA (the "Bank" or the "Parent Company"), defines specific sustainability guidelines and introduces objectives aimed at including ESG factors in all the Group's main areas of business and operational areas.

In particular, the Policy aims to identify a clear path towards a sustainable development capable to guide not only the Group's operations, but also the actions performed along its value chain .

Specifically, with reference to the United Nations 2030 Agenda and as reported in the Consolidated Statement of Non-Financial Nature (the "DCNF"), the Group is inspired in its actions by the Sustainable Development Goals (the "SDGs," *i.e.* *Sustainable Development Goals*), specifically by those deemed relevant in light of its business activities and those proposed by Global Compact with reference to financial companies, as listed below:

- Goal 1: End poverty in all its forms everywhere;
- Goal 3: Ensure healthy lives and promote well-being for all at all ages;
- Goal 4: Ensure inclusive and equitable quality education and promote lifelong learning opportunities for all;
- Goal 5: Achieve gender equality and empower all women and girls;
- Goal 7: Ensure access to affordable, reliable, sustainable and modern energy for all;
- Goal 8: Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all;
- Goal 9: Build resilient infrastructure, promote inclusive and sustainable industrialization and foster innovation;
- Goal 10: Reduce inequality within and among countries;
- Goal 11: Make cities and human settlements inclusive, safe, resilient and sustainable;

- Goal 12: Ensure sustainable consumption and production patterns;
- Goal 13: Take urgent action to combat climate change and its impacts;
- Goal 16: Promote peaceful and inclusive societies for sustainable development, provide access to justice for all and build effective, accountable and inclusive institutions at all levels;

The Group confirms its support to the SDGs as well as to the principles of the Global Compact through the Communication On Progress and details its contents within its DCFN.

1.2 Scope of application

The Parent Company not only is responsible for implementing and updating the Policy, but also for providing the guidelines necessary to ensure each Company within the Group complies with it and for overseeing the adoption successfully.

The overmentioned document, as well as any subsequent updates, is transposed into the Regulation of the Subsidiaries through a resolution act of their BoD.

The Policy is applied across the board to all the Group operational areas considering also any further related internal documentation, among which:

- Parent Company and its Subsidiaries Code of Ethics;
- Documents supporting the health and safety system, according to the legal requirements;
- Guidelines on diversity and inclusion;
- Model of Organization and Management (MOG) according to the Legislative Decree 231/2001;
- Group Environmental Policy;
- Group ESG Credit Policy;
- Prevention of Money Laundering and Terrorist Financing;
- Regulations of the Sustainability Management Committee;
- Regulations of the Board of Directors and Board Committees;
- Climate and Environmental risks Framework.

1.3 Methods of approval and review

The Policy is drafted and regularly updated by the Sustainability Office, which reports hierarchically to the Chief Financial Officer Area.

As significant changes occur in the regulatory framework and in defining Group objectives, the document is reviewed consistently with the progressive integration of ESG factors into the main business processes and operability.'

The Policy approval, as well as any modification and significant integration thereof, falls within the Parent Company's Board of Directors responsibility, prior contents verification by the Sustainability Committee, in turn preceded by an evaluation held by the Sustainability Management Committee'.

If the Policy amendments are merely declaratory of Board resolutions or organisational reviews, as well as in case of further formal change or limited substantive content, the approval is left to the Chief Executive Officer of the Bank.'

1.4 Management, supervision and monitoring arrangements

The Parent Company provides the necessary guidelines to ensure compliance with this Policy by the individual Group Companies, supervising their adoption, proportionally to their respective size characteristics, the nature and type of business carried out, the complexity and operational specificity of each, as well as, if located abroad, consistent with the constraints imposed by the jurisdiction to which they belong.

The Policy is shared with key stakeholders through internal (intranet) and external (institutional website) channels.

The Sustainability Committee acts as coordinator with a monitoring role to oversee the effective implementation of the principles outlined in this document, reporting directly to the Board of Directors on these issues. In this regard, see the section "Sustainability Governance: roles and responsibilities."

2. Definitions

Sustainable Development	Development that meets the needs of the present without compromising the ability of future generations to meet their own needs.
ESG Themes.	Acronym for Environmental, Social and Governance, i.e. issues that take into consideration environmental, social and good governance aspects.
ESG Factors	Environmental, social or governance elements that may have a positive or negative impact on the financial performance or solvency of an institution, sovereign or individual.
Sustainable Finance	Finance in support of economic growth, which, at the same time, reduces the pressure on the environment by taking into account social and governance aspects, as defined in the homonymous EU Action Plan.
Inclusive	Environment or society in which physical, socio-economic, ethnic and gender differences are valued in a way to give everyone equal opportunities for growth in a fair and cohesive system capable of taking care of all citizens, ensuring their dignity, respect for differences and equal opportunities.
Consolidated Non-Financial Statement (NFS)	Reporting document prepared pursuant to Legislative Decree 254/2016 and subsequent amendments and additions regarding the communication of non-financial information at the Group level.
Climate and	Risk related to the possibility that climate change and environmental degradation provoke structural changes affecting economic activity

Environmental Risk	and, consequently, the financial system.
ESG Risk Factors	Negative impacts of ESG factors assessed in a perspective of "double materiality", according to which the Bank can be simultaneously subject to the negative influence of ESG factors (perspective "outside-in" - financial materiality) and have, itself or through the economic and financial activities of its counterparties or investment activities, a negative impact on ESG factors ("inside-out" perspective).
United Nations Global Compact (2000)	Initiative launched in 2000 with the aim of synergistically involving the world of business and non-governmental organizations in the great challenges for humankind, in order to give a further boost to the achievement of the Millennium Development Goals. The Global Compact encourages companies around the world to create an economic, social and environmental framework aimed at promoting a healthy and sustainable world economy, which guarantees everyone the opportunity to share its benefits. To this end, the Global Compact requires participating companies and organizations to share, to support and to apply in their sphere of influence a set of fundamental principles relating to human rights, labor standards, environmental protection and fight against corruption.
Communication on Progress (COP)	Document through which companies that are members of the Global Compact report annually to their stakeholders on their activities and results.
United Nations Sustainable Development Goals - SDGs (2015)	Global initiative of the UNDP (United Nations Development Programme) which aims to eliminate poverty, protect ecosystem balances, build inclusive societies and promote peace. It consists of 17 objectives (SDGs) and 169 specific targets.
Paris Agreement on Climate Change (2015)	The Paris Agreement has the long-term goal of avoiding dangerous climate change by limiting global warming to well below 2°C and continuing efforts to limit it to 1.5°C. Furthermore, it aims to strengthen the capacity of signatory countries (195) to address the impacts of climate change and to support them in their efforts. The Paris Agreement is the first universal and legally binding agreement on climate change, adopted at the Paris climate conference (COP21) in December 2015.
Task Force on Climate-Related Financial Disclosures (TCFD) Recommendations (2017)	11 recommendations published in June 2017 by the TCFD, formed in 2015 by the Financial Stability Board (FSB), with the aim of guiding the private sector in reporting the information needed by investors, lenders, and insurance companies to assess climate-related risks and opportunities.
UNEP FI Principles for Responsible Banking (PRB) (2019)	The program, developed through an innovative partnership between banks around the world and the United Nations (United Nations Environment Programme - Finance Initiative), aims to promote measures to encourage the development of a sustainable banking sector by aligning it to Agenda 2030 of the United Nations and to the

	2015 Paris Agreement on climate change.
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3. Legislation and reference principles

The Policy is aligned with the leading principles of sustainable finance, outlined at the EU and national level by regulations and guidelines, including:

- Legislative Decree 231/2001 (Administrative Liability of Entities) and subsequent amendments;
- Legislative Decree 81/2008 (Consolidation Act Health Protection and Safety in the Workplace) and subsequent amendments;
- Legislative Decree 254/2016, implementing Directive 2014/95/EU of the European Parliament and of the Council requiring large and public interest enterprises to include non-financial statements in their annual reports or in a separate filing;
- Legislative Decree 179/2017 (Provisions for the protection of the authors of reports of crimes or irregularities of which they have become aware in the context of a public or private employment relationship, so-called "whistleblowing") as amended;
- Regulation (EU) 2088/2019 which aims to provide greater transparency about the sustainability of financial products;
- Regulation (EU) 852/2020 establishing a framework to facilitate sustainable investment and amending Regulation (EU) 2019/2088 (so-called Taxonomy);
- European Central Bank, "Guidance on climate and environmental risks (2020)."
- Directive (EU) 2022/2464 of the European Parliament and of the Council of December 14, 2022 regarding corporate sustainability reporting (so-called CSRD).

The Policy is also inspired by international principles and initiatives, such as:

- United Nations Global Compact (2000);
- United Nations Sustainable Development Goals (2015);
- Paris Agreement on Climate Change (2015);
- Task Force on Climate-related Financial Disclosures (TCFD) Recommendations (2017);
- UNEP FI Principle for Responsible Banking (PRB) (2019);
- Good practices for climate-related and environmental risk management (2022) of the European Central Bank.

With regard to the behavioral norms of employees, external collaborators, financial advisors, and the guidelines of relations with customers, investors, and all other categories of stakeholders, please refer to the Code of Ethics.

4. Sustainability governance: roles and responsibilities

This document enshrines the roles and responsibilities at Group level on sustainability issues.

Board of Directors (BoD)	<ul style="list-style-type: none"> ○ Sets Group-wide guidelines, targets and strategies on sustainability issues (Business Plan); ○ Ensures the integration of ESG risks into business strategies, governance, processes, procedures, and the system of controls; ○ Approves the Non-Financial Statement (NFS) and main policies within its purview; ○ Approves the Risk Appetite Framework and the risk governance policies, integrating them with ESG factors and specifically with climate and environmental risks; ○ Supervises training and updating activities about ESG factors and related risks, paying particular attention to climate and environmental risks, in order to monitor and progressively increase its skills, also through the completion of surveys and self-assessments; ○ Oversees the proper oversight of these issues.
Board of Auditors	<ul style="list-style-type: none"> ○ Supervises compliance with the legal requirements stipulated in NFS drafting; ○ Monitors the adequacy of the procedures and processes that govern the drafting of the NFS.
Sustainability Committee	<p>Supports the BoD with an investigative, advisory and proactive role in the assessment of sustainability factors deemed essential to the medium and long-term strategy and their translation into Bank policies ; in particular:</p> <ul style="list-style-type: none"> ○ Reviews and evaluates the contents of the Group Sustainability Policy and the related strategies developed by the structures and the Sustainability Management Committee; reviews and evaluates the consistency of the Bank's other policy documents with sustainability objectives in light of relevant national and international regulations, standards and practices; ○ Supports the other Board Committees on sustainability topics, particularly in risk and opportunity analyses, compensation policies, training and succession plans; ○ Evaluates, also from a proactive standpoint, the integration into the Business Plan of environmental and social aspects aimed at creating value in the medium to long term; examines the Bank's commitments in relation to sustainability, particularly with regard to decarbonization

	<p>("net zero") objectives, and assesses their pursuit, with particular regard to the products offered and sustainable finance solutions;</p> <ul style="list-style-type: none"> ○ Evaluates the integration of sustainability issues into procedures and decision-making processes regarding the Bank's investments; ○ Promotes and encourages the Bank's initiatives aimed at ensuring an ongoing engagement with stakeholders on issues within the Committee's purview, making sure the Board is informed of the outcomes of such initiatives; ○ Reviews the NFS in light of the approved Policies, actions taken, and results obtained, in advance of the Audit and Risk Committee, so that the Committee can take them into account in carrying out its functions; ○ Evaluates the other sustainability disclosures prepared by the Bank, including the TCFD Report and the relevant contribution to sustainability issues of the Public Disclosure in application of the "Pillar III" regulations; ○ Supports the Bank in dialogue with the Authorities regarding the outcomes of supervisory assessments on sustainability issues and guidance received; ○ Reviews sustainability rating agency assessments and suggested actions; evaluates the Bank's positioning within industry metrics, indices and benchmarks; performs monitoring functions regarding the evolution of sustainability factors, in light of international guidelines and principles, as well as market and relevant regulatory developments; ○ Evaluates initiatives to spread sustainability culture within the Bank and awareness of the importance of pursuing sustainable development among staff and employees; ○ Examines the Bank's non-profit strategy and its implementation, with a focus on initiatives in favour of local communities, assessing their social and environmental aspects; promotes the development of relationships with institutions and the third sector; ○ Takes care of reports and documentation in order to facilitate the Board of Directors' decisional process.
Sustainability Management Committee	<ul style="list-style-type: none"> ○ Periodically reviews regulatory developments, standards, and relevant national and international practices on ESG factors; ○ Evaluates proposals for introducing and amending relevant internal regulations and translating of guidelines in concrete initiatives, it also defines the operational plans and monitors actual implementation; ○ Contributes to the coordination of organizational structures

	<p>and Subsidiaries in order to comply with the sustainability guidelines established by the BoD and implemented in strategic planning as applicable from time to time;</p> <ul style="list-style-type: none"> ○ Coordinates activities aimed at identifying potentially relevant sustainability issues and updating the materiality analysis. It also reviews the NFS and the attached TCFD Report, making relevant comments and suggestions to be forwarded to the Sustainability Committee; ○ As part of transactions with debt instruments having sustainability characteristics (so-called ESG Bonds): <ul style="list-style-type: none"> i. Approves the framework and the annual allocation and impact reporting; ii. Reviews and validates the set of eligible assets; iii. Oversees and monitors the management of proceeds; ○ Coordinates and monitors engagement activities with relevant stakeholders and disclosure actions; ○ Is informed by the Chairman (Chief Financial Officer) about the work carried out at each meeting by making minutes and working papers available, if requested.
Audit and Risk Committee	<p>Consistent with its mandate, it assists the BoD with regard to ESG factors and associated risks:</p> <ul style="list-style-type: none"> ○ In determining the guidelines of the internal control and ESG risk management system; ○ In periodically reviewing the adequacy of that system with respect to the Banks characteristics and risk profile, as well as its effective functioning; ○ In conformity assessment of qualitative and quantitative information included in the NFS in accordance with regulatory guidance and reporting standards, after consulting with the statutory auditor and the Board of Statutory Auditors.
Risk Committee	<p>In line with the General Regulation of Climate-Environmental Risks:</p> <ul style="list-style-type: none"> ○ Examines proposals for definition, integration or significant modification of climate and environmental risk monitoring techniques, methodologies and criteria, expressing its own opinions and assessments; ○ Evaluates proposals regarding the definition, updating or revision of the representative parameters of climate and environmental risk appetite in the Risk Appetite Statement (RAS); ○ Evaluates proposals for the introduction, extension, modification or significant integration of climate and

	<p>environmental risk analysis systems, models, techniques or methodologies;</p> <ul style="list-style-type: none"> ○ Approves the system of operational level limits/thresholds associated with climate and environmental risk exposure indicators.
Sustainability Office	<ul style="list-style-type: none"> ○ Constantly monitors national and international regulations, standards and practices on sustainability issues; ○ Supports and coordinates the central and peripheral structures, as well as the subsidiaries in understanding and addressing sustainability factors and interfacing with relevant stakeholders; ○ Drafts the NFS and other sustainability disclosures, including the TCFD Report, coordinating the related activities; ○ Contributes to the preparation of Public Disclosures in application of "Pillar III" regulations, as regards the section on ESG risks; ○ For the parts falling under its expertise, carries out communication activities with the Supervisory Authorities, in particular by supporting the Risk Control Service in relation to climate and environmental risk issues; ○ Manages dialogue with ESG rating agencies, handles questionnaire completion and monitors Group-wide ratings; ○ Supports and coordinates the drafting of the Group's guidelines, targets and strategies on sustainability issues (Business Plan) with particular reference to the Bank's commitments to decarbonization targets ("<i>net zero</i>"); ○ Identifies and promotes initiatives to spread sustainability culture within the Bank and awareness of the importance of pursuing sustainable development among staff and employees; ○ Looks after the relationship between the Bank and Third Sector entities, proposing initiatives in favour of local communities, evaluating their social and environmental impacts; ○ Supports the Sustainability Management Committee: <ul style="list-style-type: none"> i. In identifying the initiatives to be implemented; ii. In the operational management of ESG factors consistent with the Business Plan; iii. Periodically monitoring and reporting initiatives; ○ Identifies initiatives aimed at spreading the culture of sustainability and promotes its internal and external communication in order to increase in colleagues and all stakeholders awareness of the importance of pursuing

	<p>sustainable development;</p> <ul style="list-style-type: none"> ○ Defines, in agreement with relevant administrative office and the Personnel and Organizational Models Service, training plans for the BoD, management/staff of the Group, aimed at ensuring suitable dissemination and awareness of ESG factors, related risks, with particular attention to climate and environmental risks.
Operational ESG Contact Persons	<p>Appointed for each of the Subsidiaries and for each of the main business areas of the Parent Company:</p> <ul style="list-style-type: none"> ○ Are reference figures for the dissemination of a culture of sustainability; ○ Adapt ESG factors with respect to the specific activities under their responsibility, identifying projects and seizing business opportunities; ○ Favour the circulation of information, the coordination of activities and their sharing, increasing the effectiveness of interaction between business functions and directing internal operations.
Mobility Manager	<ul style="list-style-type: none"> ○ Provides ongoing support for decision-making, planning, scheduling, managing and promoting optimal solutions for the sustainable mobility of Group employees.
Risk Control Service	<ul style="list-style-type: none"> ○ Identifies, assesses, measures, and monitors ESG risks, with a focus on climate and environmental risks, as well as on those associated with them. For these purposes, it progressively integrates them into relevant regulations, processes, procedures, support systems, data and reporting; ○ Supports and coordinates the gradual integration of climate and environmental risk factors into risk management and reporting systems with specific reference to the "European Central Bank Guidance on Climate and Environmental Risks." ○ Oversees and, for its areas of expertise, executes stress tests required by regulatory authorities pertaining to ESG factors, with a focus on climate and environmental risks; ○ Supervises the preparation of Public Disclosure in application of "Pillar III" ESG regulations.
Compliance Function and DPO	<p>As part of the organizational oversight relating to the proper performance of regulatory obligations relevant to the integration of ESG factors and to the effective management of relevant risks, with particular attention to climate and environmental risks:</p> <ul style="list-style-type: none"> ○ Identify the applicable standards; ○ Check the compliance of business processes with internal

	<p>and external regulations with the aim of preventing and containing legal and reputational risks;</p> <ul style="list-style-type: none"> ○ Evaluate the degree of exposure to relevant risks through quantitative and/or qualitative summary indicators, expressive of the findings of the surveys on the processes overseen; ○ Prepare direct information flows to corporate bodies and structures involved in the process.
Internal Audit Service	<p>As part of its responsibilities to verify the proper functioning of the system of internal controls:</p> <ul style="list-style-type: none"> ○ Verifies corporate and Group operations are in compliance to sustainability policies; ○ Assesses the adequacy and functionality of the climate and environmental risk management process; ○ Reports to the corporate bodies any inefficiencies, weaknesses or irregularities revealed during its audit activities, making recommendations and bringing to attention possible improvements.

5. Relevant areas of sustainability topics

The Group confirms the centrality of ESG factors in its operations and, as evidence of an increasingly strong awareness and commitment, continuously updates the strategies, internal regulations and implements the processes in order to coherently integrate the business. The sustainability strategy is determined through the identification of quantitative and qualitative targets, the definition of actions for their credible achievement, monitoring with key performance indicators (KPIs) selected from international best practices. These targets and the relevant KPIs are regularly disclosed within the NFS and the TCFD Report, as well as in other reporting tools.

The identification of material topics, which are fundamental to the implementation of the Business Plan, considers the national and international context related to sustainable finance, the regular dialogue with stakeholders and the regulatory requirements, including the disclosure requirements expressed by Legislative Decree 254/2016. Starting from these topics, assessed below, the Group annually updates its sustainability strategy, as well as the list of material topics published in the NFS, and declines the KPIs that can be deemed relevant as they reflect the economic, environmental and social impacts, or influence the *stakeholders* and therefore to be included in non-financial reporting.

5.1 Environmental protection and combating climate change

The Group complies with environmental regulations and is aware of the impact its activities generate on the environment, both directly and indirectly.

The Bank adheres to the TCFD Recommendations in order to measure the adequacy of its climate strategy and communicate relevant climate-related aspects in a transparent and timely manner.

The Group, in line with its Business Plan, provides itself with more specific climate related targets, specifically aimed at reducing greenhouse gases emissions and it is also committed to reduce the effects on the environment generated by resource consumption, waste generation, and other activities with a direct impact, and to manage the effects arising from indirect impact activities, particularly related to its portfolios, products, and services to customers. Specifically, it identifies, monitors and evaluates specific KPIs in its business and corporate operations.

The Group implements actions to ensure proper management of climate and environmental risks with the aim of integrating the assessment of such risks into the formulation and implementation of strategies, lending, financial and investment policies, and the provision of services to customers.

Consistent with the strategies outlined above, the Group is committed to issuing debt financial instruments aimed at financing or refinancing activities meeting specific climate-environmental criteria and it also updates its commercial offering with the aim of supporting its customers in the transition to a more environmentally conscious economy and towards the reduction of greenhouse gases emissions.

5.2 Social themes

The Group identifies in its Codes of Ethics the founding values of solidarity, subsidiarity, attention to people and closeness to the community, and is committed to promoting their social and economic development.

It implements constant action to promote dialogue with the community, made up in particular of families and small and medium-sized enterprises (SMEs).

Consistently, it develops supportive initiatives that positively impact the quality of life, employment, investments, skills development and personal and social relationships.

As defined in the Business Plan, the Group intends to strengthen activities with a positive impact on the local area and the community, by means of a program of sponsorships and charitable donations on the one hand, and supplier analyses that also consider their ESG performance on the other. It aims to consolidate its position in the corporate sector, with a focus on SMEs, as well as to intensify its presence in high-value areas with a potential that is not fully expressed and capitalize on new opportunities, but also to maintain a constant presence in rarely populated areas.

5.3 Enhancement of human resources

The professionalism of its human resources is a core value for the Group, and as a result, the process of selecting and developing employees' skills plays a central role.

Employees are given the opportunity to grow professionally through training and performance appraisals to promote a stimulating work environment with a view to continuous development.

The professional growth of personnel is supported by an articulated training system that includes projects aimed at specific groups of employees, such as new recruits, and the development of all main themes of the banking business. The training programs do not neglect the transversal contents of the different positions existing in the bank, with the aim of strengthening certain skills such as relational, negotiation and work group management skills.

The Group promotes the values of health and safety in the workplace and in relations with its partners and suppliers, complying with the regulations in force and, as defined in the Business Plan, annually renews the training plan on sustainability, aimed at spreading a corporate culture, sharing and enhancing the path taken with all employees. It also supports an inclusive work environment that can guarantee equal opportunities and ensures that no forms of discrimination contrary to the laws,

harassment or bullying of any kind take place.

5.4 Human rights protection

The Group bases its own actions on respect of human rights as an indispensable requirement, protecting and promoting these rights in the conduct of its activities; specifically, it identifies the valuing diversity and inclusion as a priority and, including through participating in national and international associations, promoting gender equality for its own and communities' sake.

Acts of psychological violence or attitudes or behaviours discriminatory or harmful to the person, his or her beliefs, convictions or preferences are not permitted in internal and external relations.

In the context of ordinary business relations, respect for human rights is deemed a fundamental value also for its partners and suppliers, even through the provision of specific contractual clauses.

5.5 Fighting Corruption

Business activities are conducted in accordance with the principles of loyalty, seriousness, honesty, competence and transparency. For this purpose, full compliance with laws and regulations in force is promoted, as well as the adoption of appropriate organizational safeguards aimed at minimizing the risk of corruption. These organizational requirements stipulate that individual and collective behaviour comply with the Code of Ethics and the Organization and Management Model pursuant to Legislative Decree 231/2001 and that any violations can be promptly reported by all employees pursuant to Article 52-bis of the Legislative Decree 230/1993 (*whistleblowing*).

In addition, in order to ensure adequate control on legal, reputational and non-compliance risks associated with the adoption of illegal conduct - with particular reference to those aimed at corruption -, the Group has a structured system for the management and supervision of fraud risks - linked to the broader sphere of operational risks ensuring their continuous assessment and promoting the adoption of the most appropriate measures to prevent or contain them.