

A photograph of a grand, ornate hallway. The walls are covered in large, floor-to-ceiling mirrors with highly decorative, gilded frames. The ceiling is painted with a fresco depicting a sky scene with clouds and figures. The floor is made of wood with a complex geometric parquet pattern. The lighting is warm and golden, highlighting the intricate details of the architecture.

Quality of service and
customer satisfaction

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RELEVANT ISSUES

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RELEVANCE OF ISSUES AND MAIN IMPACTS

The Group is focused on providing top-quality banking, financial and insurance products and services to its customers, fostering the development of the areas in which it operates. The service model is organised on business areas with an organisational structure that guarantees monitoring in both Italy and the other countries in which it operates. Dialogue with its customers represents a constant commitment for the Group, in order to maintain the relationship at a level of excellence, maximizing their satisfaction and reducing the probability and relevance of complaints and disputes. Intesa Sanpaolo makes the information it provides to its customers clear and comprehensible in all stages of their relationship with the Bank through simple language and transparent policy statements. Elements of attention for the Group are also the protection of the health and safety of people: the management of physical safety risk is of fundamental importance for the protection of the physical integrity of people, whether they are staff, customers or suppliers.

PERFORMANCE INDICATORS, RESULTS ACHIEVED AND OBJECTIVES

Macro-issue	Projects/Indicators	2022 Actions/Results	Plan Objectives for 2025
Quality of service and customer satisfaction	Net Promoter Score ^(*)	NPS Retail: 22; NPS Exclusive: 16; NPS Corporate: 17; NPS Third Sector: 23; NPS Agribusiness: 17. In 2022, the survey consisted of about 653,000 responses from Retail customers, 138,000 responses from Exclusive customers, 65,000 responses from Corporate customers, 11,000 responses from Third Sector customers and 17,000 responses from Agribusiness customers	Enhancing the quality of service levels
	Average response times to customer complaints and appeals (Parent Company) compared to reference regulations (RR)	Investment products and services: 36 days (vs RR 60 days); Insurance products and services: 22 days (vs RR 45 days); Payment services: 13 calendar days (vs RR 15 working days); Ordinary: 15 days (vs RR 60 days)	Maintaining high performance levels in listening to customers
	Number of robberies	12 (3 in 2021)	Continuous focus on the safety of the Group customers and employees

^(*) The NPS is an indicator that expresses the likelihood of customers to recommend a product, service or company, calculated in index points (between -100 and +100) subtracting the percentage of detractors (dissatisfied customers) from the percentage of promoters (loyal customers) obtained. Findings collected from the Banca dei Territori Division customers.

COMPANY POLICIES

In keeping with the values and principles of conduct defined in the Code of Ethics, which are based on listening and dialogue, transparency and fairness, and the protection of safety in business relations, the Group places its focus on the customer and strives to maintain excellent relationships. These values and principles are incorporated in the essential standards of behaviour set out in the Group's Internal Code of Conduct. In addition, for specific areas of activity governing the quality of customer relations, there are Governance Guidelines and rules based on the initiation of processes which, by adopting models involving high levels of protection, shape conduct according to criteria of considerable good faith and fairness in relations. Customer health and safety aspects also are monitored with policies that establish principles and rules of conduct and define responsibilities in operational relations in branches. As confirmation of the Company's constant attention to such issues, in November 2022 the Board of Directors approved the Corporate and Physical Security Guidelines for the Intesa Sanpaolo Group, updating and integrating the previous version.

QUALITY OF SERVICE

Intesa Sanpaolo has adopted a service model focused on business areas with an organisational structure that guarantees monitoring in both Italy and the other countries in which it operates. The Divisions are responsible for developing the best quality service levels through the various channels, in order to improve the efficiency of the commercial products they offer to the various types of customers. Customer satisfaction and service quality are monitored and overseen by the structures that deal with customer satisfaction and customer experience in the various business Divisions.

LISTENING TO RETAIL AND BUSINESS CUSTOMERS IN ITALY

The Banca dei Territori (BdT) Division has developed a well-structured and extensive system for listening to customers' opinions which is able to identify factors of customer satisfaction and dissatisfaction and to promptly intercept the areas where action is needed, by initiating dedicated processes and actions for improvement. The Division's listening system is based on a number of tools:

- the NPS (Net Promoter Score) allows a concise and effective understanding of the customer's likelihood to recommend the Bank through a survey differentiated according to customer segment;
- the NSI (Net Satisfaction Index) is the tool for tracing customers' opinions on key moments relating to processes/experiences of interaction with the Bank;
- the SEIok Programme contributes towards the determination of the Variable Result Bonus for the Network and offers solid support for improvement in the level of service offered to customers.

NET PROMOTER SCORE – NPS®

The NPS is an indicator that expresses the likelihood of customers to recommend a product, service or company, calculated in index points (between -100 and +100) subtracting the percentage of detractors (dissatisfied customers) from the percentage of promoters (loyal customers) obtained. Intesa Sanpaolo carries out NPS surveys via telephone, email, App or Internet Banking on Retail, Retail Business, Business, Third Sector and Agribusiness customers.

The listening system was developed even further during 2022:

- for NPS, by increasing the number of votes, also thanks to the introduction for Retail customers of surveys via the telephone channel and push notifications on the App;
- for the NSI of the Digital Branch (which represents the evolution of the Online Branch), by activating a new survey to collect customers' perceptions with respect to commercial proposition phone calls;
- for the NSI of digital channels, by continuing the activation of new contact points for recording customer feedback;
- for the NSI of relations with the agents of the Division companies, by continuing with telephone surveys dedicated to Prestitalia, Intesa Sanpaolo Casa and Rent Foryou customers.

In addition, the Banca dei Territori surveys were enhanced during the year to get further details about customer sensitivity towards sustainability issues: an assessment about general ESG issues was accompanied by an in-depth analysis to highlight their interest in socially responsible investment products and attention to lower environmental impact deriving from processes that do not require paper printing.

At Division level, a total of approximately 1.7 million feedback comments were collected from customers in 2022; in particular, the results of the NPS surveys are shown below.

Net Promoter Score (NPS) by customer type	2021	2022
Retail	16	22
Exclusive	14	16
Business	13	17
Third Sector	19	23
Agribusiness	8	17

Findings collected from the Banca dei Territori Division customers.

The NPS shows a growth trend in 2022 for all Sales Regions, confirming the importance of the focus on customer relationship and customer service, which made it possible to obtain satisfactory results exceeding those recorded in the previous year.

MONITORING NETWORK QUALITY

The Quality and Complaints representatives, included in 2021 within the individual Regional Departments and from 2022 in the Digital Branch, support the Network and spread the culture of quality and the NPS. Starting from the highlights that emerged from the analysis of the NPS surveys, the BdT Quality and Research unit identified and transmitted, through the Close the Loop platform, the list of branches where priority specialised coaching and meetings should be launched dedicated to Branch Managers. The aim of the meetings will be to identify what improvement actions to take, which will be implemented by branch colleagues, with constant support from the Quality and Complaints representatives and the detailed analysis available for each branch.

The experiences of excellence collected will then be shared to further spread the culture of the NPS and quality in a uniform manner throughout the area.

In addition, 213,000 responses to questionnaires sent to Division employees were analysed, showing an increase of 52% compared to 2021. In particular, the Quality4Network Programme was further enhanced and by means of 8 dedicated surveys, the level of satisfaction with the services provided by the central structures to the Network was measured, with the aim of improving its quality and making the work of the Group's people in contact with customers easier.

Lastly, in 2022 the process of updating the technological infrastructure of the surveys continued and the accessibility of the surveys for Group customers and employees was further developed, to facilitate their usability by visually impaired people.

LISTENING TO LARGE CORPORATE CUSTOMERS IN ITALY

As part of maintaining relations with the Large Corporate customers, the Customer Experience surveys also are designed and conducted regularly on the basis of views shared with the structures responsible for products and services, in order to identify the measures to be taken to improve the range of products and services offered. The results of the surveys are shared on an ongoing basis with the relations functions which, in their approach with the customers, benefit from the information received and can act with greater awareness of and focus on their needs.

During 2022, the IMI Corporate and Investment Banking Division (IMI CIB) designed and developed the following surveys:

- 28 representatives from customer Financial institutions were involved in a quality listening activity to identify digital priorities and define the key themes relating to digital maturity of financial institutions. The response rate was 36%;
- 72 representatives, with the role of Investor Relator in companies belonging to the STAR segment, were involved online in a qualitative research project aimed at understanding opportunities and tools required to support economic growth and what risks might slow down the progress. The response rate was 56%;

- 217 representatives from the Finance Area of 109 customer Corporate companies were identified, and already partly engaged, in order to take a closer look at the current digital management of banking products and services and the Division's related expectations, as well as the level of satisfaction with the IMI CIB offer model, with the aim of better addressing the needs expressed. The response rate was 31%;
- 27 customers were involved in a structured listening project for the main needs on ESG issues and, in particular, on Carbon Credit strategies. The response rate was 33%;
- 16 customers were involved in a listening project related to the substitute storage service of accounting documents, currently integrated into the Easy Fattura product. In particular, the following topics were investigated: stability, quality of service and level of satisfaction. The response rate was 69%.

LISTENING TO CUSTOMERS IN THE INTERNATIONAL SUBSIDIARY BANKS

In 2022, the International Subsidiary Banks Division continued with the monthly customer listening process, consistent with the methods adopted by the Parent Company, aimed at measuring the quality perceived by customers on their relationship with the Bank, the channels used and the products and services offered. Based on the evidence that emerged, the Banks are implementing specific initiatives aimed at improving the level of customer satisfaction, including greater dialogue with customers by managers and a greater push to use digital channels for transactions. In 2022, these initiatives involved VUB Banka, PBZ, Banca Intesa Beograd (BIB) and CIB Bank.

Benchmarking surveys in CIB Bank, BIB, VUB Banka, Intesa Sanpaolo Bank Slovenia, PBZ, Alexbank and Intesa Sanpaolo Bank Albania involved over 14,000 people in total, including about 2,600 customers from the Group's International Subsidiary Banks involved in these surveys. In addition, the Instant Feedback – Net Promoter Score (NPS) listening programme, active in seven banks of the Division, allowed about 220,000 customer opinions to be gathered regarding their experiences when contacting the Bank.

In 2022, there was a continued analysis of the trend of complaints on all subsidiaries in the Division, with the exception of Pravex Bank, due to the contingent situation. With regard to SME customers (retail area), VUB Banka, PBZ, BIB and CIB Bank launched a quarterly customer listening process in 2022, which made it possible to collect over 10,000 customer opinions.

With regard to SME customers, Customer Satisfaction surveys were carried out in 2022, both internally and for benchmarking in 6 banks: PBZ Bank, CIB Bank, VUB Banka, BIB, Intesa Sanpaolo Bank Slovenia and in Intesa Sanpaolo Bank Albania. The surveys involved over 4,700 SMEs.

The main strengths emerged included: the service quality, the staff's ability to listen, the proactive nature in finding solutions to customer needs and the greater stability of online channels.

LISTENING TO CUSTOMERS OF THE INSURANCE GROUP

The Customer Satisfaction survey system in the Insurance Group involves, on a voluntary basis, all the calls received by Customer Service of Intesa Sanpaolo Vita and Intesa Sanpaolo Assicura using a 2-question questionnaire to assess the Service. During the year, the survey addressed to customers following their calls to Customer Service achieved good results. In particular, on a scale from 1 to 5, the average score was 4.1 for general satisfaction and for the management of the call.

The initiative is in addition to the one already active for customers from Non-Life business, who in 2022 expressed a significant level of satisfaction; in particular, on a scale from 0 to 10, the average scores were as follows: 8.9 for roadside assistance; 8.4 for Motor liability claims; 8.8 for Land Vehicles Insurance claims; 7.9 for Home Assistance and 8.3 for Home Claims.

During 2022, the Fideuram Vita Company launched a survey on customer satisfaction by placing a questionnaire on the Fideuram Vita website, in the reserved area for customers, with the aim of measuring, in particular, overall satisfaction with the Company and satisfaction with Fideuram Vita on some specific aspects (for example products, completeness of the range, correspondence of the products to their needs, quality of service). Customers expressed a significantly high level of satisfaction: on a rating scale from 1 to 10, the average mark was 8.4 with 52% of customers saying they were really satisfied (mark 9-10).

LISTENING TO CUSTOMERS IN FIDEURAM - INTESA SANPAOLO PRIVATE BANKING

The Private Banking Division's Customer Satisfaction survey of customers of the Fideuram, Sanpaolo Invest, IW Private Investments and Intesa Sanpaolo Private Banking Networks takes account of the peculiarities of the service models. The survey received 33,893 replies from customers (22,906 for Fideuram, 5,779 for Sanpaolo Invest, 1,774 for IW Private Investments and 3,434 for Intesa Sanpaolo Private Banking). The results confirmed a good level of customer satisfaction with all Networks: the relationship with Private Bankers is always one of the fundamental elements in the appreciation of the service; in particular, customers recognise their helpfulness, expertise, ability to offer solutions suited to their needs.

The following aspects emerged from the survey:

- Fideuram, Sanpaolo Invest and IW Private Investments Networks: in the current context, the survey confirms a further strengthening in appreciation for solidity and reliability aspects, for being part of a large Group and for the multi-channelling system. Customers confirmed the importance of financial and equity advice but also online banking and digital tools as some of the most valuable instruments in their relationship with the Bank. In 2022, the NPS indicator was 59 and the Customer Satisfaction Index (CSI) was 8.3, on a scale from 0 to 10. A sound knowledge of ESG issues was confirmed: over 60% of customers know this type of investment and 44% of them believe that ESG investments create value for themselves, for the community and the environment;
- Intesa Sanpaolo Private Banking: appreciation for the solidity and reliability of the Group is confirmed; the professionalism of bankers and branch staff, the understanding of customer needs, the ability to make them feel privileged, as well as attention to privacy and the ability to anticipate critical issues are also recognised. In 2022, the NPS was 66 and the CSI was 8.5. With regard to ESG issues and products, it emerged that 53% of customers involved know them, 34% already have them in their portfolio and over 65% of the sample, for the same return, prefer to invest in these instruments..

MANAGEMENT OF COMPLAINTS

The Intesa Sanpaolo Group maintains an ongoing dialogue with its customers to ensure that their relationship remains excellent. The careful and prompt management of complaints and other requests made by customers expressing their dissatisfaction is of fundamental importance for consolidating the relationship of trust and addressing critical situations. In Italian law, the regulations issued by the relevant Supervisory Authorities provide for specific information requirements by the Compliance Function, with the aim of reporting at least once a year to corporate bodies and authorities on the overall situation of complaints received, as well as on the adequacy of the procedures and organisational solutions adopted.

The regulatory, procedural and organisational framework adopted by the Group is defined by the Guidelines for managing complaints, protests to the Supervisory Authorities and appeals to alternative dispute resolution Bodies, issued by the Board of Directors of the Bank on 5 July 2016 and updated in October 2021.

In 2022, a total of 117,191 claims¹ were registered at a Group level, broken down as follows:

- Banca dei Territori Division: the requests recorded totalled 57,303 (-30% lower than in 2021) of which 46,582 related to the Banks and Companies of the Group² (-27% compared to 2021), 5,785 submitted to Prestitalia (-38%) and 4,936 submitted by former Accedo customers (-43%). The reduction concerns all product categories with the exception of investments, and is attributable to the reduced number of requests concerning the quality of service provided to customers, and of requests relating to fraud on payment systems and malfunctions of the site and the App. During 2022, outcomes for 47,443 requests were finalised, of which 14,065 were accepted and 3,311 of these involved disbursements; in addition, 1,966 requests referring to the previous activity of Accedo and 2,153 referred to Prestitalia entailed disbursements. Excluding requests submitted by former Accedo customers and Prestitalia customers who, in exchange for the early repayment of loans with assignment of one-fifth of salary, claimed the pro-rata refund of fees and/or charges paid at the time of disbursement, the following are the complaints, reiterations, reports and A.D.R. (Alternative Dispute Resolution) appeals submitted for the various product/service categories:
 - organisational and management issues and functions of Internet sites: (14,479; -23%). The requests mainly concerned the quality of service offered by the branches (3,977; -35%), website and App malfunctions (3,144; -29%), requests for documentation (2,242; -13%), successions (2,030; -12%), equipment malfunctions (1,633; +13%);
 - payment systems: 11,919 requests (-43%), mainly relating to the results of requests for the disclaimers of transactions made with payment cards or through internet banking services, as well as errors or delays in

⁽¹⁾ The claims include complaints and their possible reiteration (customer appeals), appeals to out-of-court dispute resolution bodies (ADR appeals) and requests for clarifications made by supervisory authorities in response to customer reports (reports).

⁽²⁾ Banks and Companies of the Banca dei Territori Division (Intesa Sanpaolo, Intesa Sanpaolo Provis, Banca5).

the execution of transactions;

- loans: 11,221 requests (-18%). The reduction is attributable to the gradual depletion of requests relating to the health emergency;
 - current accounts, deposits and securities accounts: 4,902 requests (-25%) due to errors or delays in processing transactions, mainly in relation to the delayed or failed closure of accounts, economic terms and conditions and their application, and communication problems on the part of the Bank;
 - insurance products: 2,496 requests (unchanged); there was an increase in the life insurance sector. In general, customers complain about errors or delays in the execution of transactions and insufficient information about the products purchased;
 - investment services: 1,565 requests (+8%); the increase is due to complaints related to dissatisfaction with investment performance, related to the market environment.
- IMI CIB Division: the number of requests was modest due to the type of transactions carried out and customers served, with 553 requests received from foreign entities (544 from Banca Intesa – Federazione Russa, 5 from International branches and 4 from Intesa Sanpaolo Bank Luxembourg). During 2022, 590 complaints were processed, of which only 329 were accepted and, among these, 3 involved disbursements.
 - Private Banking Division: a total of 6,479 requests were registered, 6,454 with reference to the Italian area and 25 to the foreign area. As regards the Italian area, there was an increase of 47%, mainly attributable to the incorporation of IW Bank into Fideuram (2,967 requests concentrated in the first half of the year and progressively decreased as a result of the adopted mitigation actions) and the introduction of the new service model. Most of the requests were on account of errors in executing orders due to malfunctions of the new “Alfabeto” website; to errors or delays in the closure or transfer of current accounts and securities accounts and in the liquidation of insurance policies. During 2022, 6,019 complaints and reiterations were settled, of which 2,856 were accepted and, among these, 285 entailed disbursements. With reference to the foreign sector, the numbers were lower than those in the Italian area, although with an increase compared to 2021 (25 vs 5), following entry into the consolidation area of Compagnie de Banque Privée Quilvest.
 - International Subsidiary Banks Division: a total of 41,638 requests were registered, with a reduction of 13.5% compared to 2021. The complaints focused mainly on five companies (VÚB Banka, Privredna Banka Zagreb, Banca Intesa Beograd, CIB Bank and PBZ Card) which registered about 91% of requests for the Division and referred mainly to malfunctions in payment systems and a few new IT implementations on internet banking devices. During 2022, 41,220 complaints were processed, of which 17,221 were accepted and, among these, 4,585 involved disbursements.
 - Insurance Division: 11,000 requests were registered (-2% compared to 2021); with reference to the area of the complaints recorded compared to 2021, it is worth mentioning the merger by incorporation of Cargeas Assicurazioni into Intesa Sanpaolo Assicura. The total number of requests registered by the Life segment Companies increased compared to the previous year, showing an increase of 8%. The total number of requests registered in the Non-Life Segment decreased by 20%, thanks to the reduction in complaints relating to motor cover and those relating to administrative and commercial areas. Finally, Intesa Sanpaolo RBM Salute recorded growth of 3% compared to 2021, mainly in relation to the Fondo MetaSalute and requests to the Supervisory Authorities. The trend in the number of complaints in 2022 showed a drop from the third quarter onwards; however, in the fourth quarter there was an increase in the number of complaints due to malfunctions related to the service provided by the call centre of the Third Party Administration (PMED). In December, the gradual restoration of PMED service levels and the mitigation actions taken by the Company led to a reduction in the number of complaints. During the year, 10,457 requests were processed, of which 3,119 were accepted and, among these, 257 involved disbursements.
 - Asset Management Division: 218 requests were recorded, with an increase of 4%, mainly attributable to incorrect or failed execution of instructions, correctness of information (pre-contractual and ex post) and unsatisfactory returns caused by market volatility on account of the continuing effects of the pandemic crisis and geopolitical instability. The disputes mainly concerned transactions with Eurizon Capital SGR and in particular the collective asset management. In 2022, 226 requests were processed, of which 8 were accepted with a disbursement.

CUSTOMER PROTECTION AND RESPONSIBLE SALES

TRANSPARENCY TO CUSTOMERS

Intesa Sanpaolo makes the information it provides to its customers clear and comprehensible in all stages of their relationship with the Bank through simple language, transparent policy statements, and consistent terms and conditions among the various documents on the same products/services. The main offer documents, drawn up in line with the clarity and intelligibility requirements, can be found in branches and also on the Bank's website, under the Banking Transparency section [i]. These include Product and Service information sheets, Specific Guides and Information documents on the conditions offered to all type of customers.

INVESTMENTS: ADVISORY SERVICE

In terms of investments, Intesa Sanpaolo offers its customers the highest possible form of protection with its advisory service. As regards transactions relating to financial products or investment services, personalised recommendations are made consistent with the customer's financial profile. With this in mind, a series of specific rules that Bank personnel must observe is fully operational. After the entry into force of the MiFID II Directive and European Regulations in the area of investor protection¹, these Rules were strengthened in order to provide investors with higher levels of protection and increased transparency in trading on the financial instruments markets. In particular, Intesa Sanpaolo provides for obligations in terms of the governance of financial instruments, knowledge and expertise requirements for personnel responsible for providing investment services and ex ante and ex post information on the costs, charges and incentives of the products and services available. The model was further refined to introduce a new survey profile on sustainability preferences aimed at verifying the consistency between the percentage of ESG financial products/investment services with respect to the sustainability preferences expressed by customers during the profiling phase.

Among the projects concerning advisory services, "Valore Insieme" continues to be a global consultancy solution provided by branch managers through an innovative relations platform that provides advanced and personalised consultancy in all phases of the construction, protection and transfer of investment portfolios, also through dedicated investment products. It is a service aimed at those looking for an exclusive relationship that combines an innovative platform and ongoing professional support from a dedicated manager.

THE PRODUCT GOVERNANCE AND COMPLIANCE CLEARING OF NEW PRODUCTS AND SERVICES

The new products and services and their subsequent variations are subject to the Product Governance process with the involvement of the Bank's various structures in order to assess all the characteristics of the product and clearly identify the customer segment it is intended for with the aim of protecting the customer. This process is constantly subject to verification by the Compliance Function to ensure substantial and formal compliance with internal and external regulations and the underlying assessments. The Product Governance process allows the transparent management of the individual phases that involve the concept, development, clearing, approval and monitoring of the products or services analysed. Every activity entails the participation of a number of structures so as to assess the characteristics of individual products and services, also in terms of ESG, whether provided by the Bank or by third party producers, as required by the regulations². Products and services undergo periodic, after-sales monitoring so as to assess their coherence over time with the predefined parameters of target markets and with the characteristics of reference customers.

Compliance assessments, nevertheless as part of the Product Governance assessments, are carried out in accordance with the principles of fairness and protection of the interests of customers, and also relate to the quality of the information provided, the consistency of the services, products or transactions with the needs and characteristics of the target customers.

The entire process is regulated by internal Guidelines and by specific process guides which the Bank has adopted, which identify in detail the activities and structures involved. To manage the entire process, the Bank has provided itself with an IT tool in order to: standardise the information of the products or services, store the documentation in a single repository and trace the decision-making process, thus ensuring a strengthening of the control measures.

⁽¹⁾ Directive 2014/65/EU (MiFID II), Regulation (EU) No 600/2014 (MiFIR) and Regulation (EU) No 1286/2014 (PRIIPs).

⁽²⁾ Bank of Italy - supplement in 2019 to the Supervisory Instructions on "Transparency of the banking and financial transactions and services" with specific provisions on product governance; IVASS - Letter "Directive (EU) 2016/97 on insurance distribution and EIOPA preparatory guidelines on product governance and control by insurance companies and distributors of insurance products" dated 4 September 2017 and Regulation 45 laying down provisions on the governance and control requirements for insurance products in force since 31 March 2021; Consob - Intermediaries Regulation, amended by Resolution 21466 in force since 31 March 2021.

DIALOGUE WITH CONSUMER ASSOCIATIONS

Intesa Sanpaolo has for some time been involved in a long-established, open and constructive dialogue, at a national level, with the Consumer Associations belonging to the National Council of Consumers and Users (within the Italian Ministry of Companies and Made in Italy). In this context, the Framework Agreement “Innoviamo le Relazioni 2.0 2021-2023” (Let’s Innovate Relationships 2.0 2021-2023) is in force; it provides for the formation of 3 permanent discussion groups on the issues of greatest interest: Products and Services, Banking and insurance education and Local Relations; Regulations and Authority, Customer Care and Conciliation; Educational and Sustainability, Impact. During 2022, two theme-based workgroups were organised aimed at the national managers of Consumer Associations concerning relevant issues, such as the presentation of the 2022-2025 Business Plan and the new remuneration model for ATM fees and commissions. In addition, with a view to further developing cooperation with the Consumer Associations, a series of meetings were strengthened with the regional delegations from 12 regions. In 2022, the training initiatives as part of the multi-year project “Mettere in comune competenze” (Sharing Expertise) continued. Since 2011, this project has seen Intesa Sanpaolo and the Consumer Associations discuss and share knowledge about their respective professions; 5 training webinars were held for the national delegates of the Associations, while a further 8 webinars were held on a local basis, involving the regional representatives of the Associations in a few Italian regions. In collaboration with the Group Function responsible for relations with local institutions, a number of direct meetings were also held with the Presidents of the Regional Councils of Consumers and Users (CRCU), particularly in the regions of Piedmont, Liguria, Veneto, Abruzzo and Lazio. Intesa Sanpaolo is also a member of the Executive Committee of Consumers’ Forum, an independent association encompassing the most important consumer associations, numerous industrial and service companies and their trade associations, and the Institutions. Work also continued throughout the year on permanent conciliation and its role as an out-of-court solution instrument adopted and managed together with the Consumer Associations through the signed Conciliation Protocol; in 2022, a training meeting was held in Florence aimed at conciliators of the Bank and of the Associations. In 2022, 130 applications for permanent conciliation were received.

CUSTOMER HEALTH AND SAFETY

Intesa Sanpaolo protects the health and safety of all the people who work there and visit its premises by implementing operational rules and technological safety measures, supported by IT tools and the promotion of a health and safety culture. The Group believes that protecting people, information and assets is an essential objective, acknowledging a crucial role also to corporate and physical security issues, in order to guarantee the preservation and growth of corporate value, the safeguarding of health and safety in the workplace and the protection of tangible and intangible assets. On the basis of the experience gained during the recent health emergency, the Bank has strengthened its safeguards and security measures, protecting the Group’s customers and employees and allowing everyone to operate in full effectiveness, efficiency and safety.

PHYSICAL SAFETY

For the protection of the health and safety of people, whether they are Group employees, customers or suppliers, the management of corporate and physical risk is of fundamental importance for the protection of physical integrity.

For this purpose, the Corporate and Physical Security Function (CPS Function) contributes, in line with company strategies and objectives, to the definition of security policies and guidelines for the Group, through the promotion, policy-making, development and innovation of models, measures and solutions for physical security, info-physical security (security measures aimed at countering attacks made using both physical and cyber methods) and Travel Security.

The initial groundwork for the above is an analysis of the risk context in which the Group operates, conducted in line with international methods and practices, also from a developmental and prospective point of view, monitoring the main indicators that point to security being compromised, through the centralised analysis of data from internal and external sources. Following these assessments, the CPS Function then defines and updates its defence strategies and countermeasures in terms of training, organisation, technology or human methods, defining the functional requirements of security systems and verifying their effectiveness over time; it also manages alarm signals and critical situations through the Security Operation Centres for physical security and Travel Security.

The CPS Function provides its services directly to the Companies in Italy according to a centralised

management model, or providing guidance and support to the Companies operating on the basis of a decentralised management model. For this purpose, it also carries out specific assessments and analyses, both inside the Bank's premises and remotely, using the Group's "data lakes" wherever necessary. In both cases, the methods applied are those described by the ISO 31000:2018 standard, with the aim of preventing possible events involving harm to persons and the Group's tangible or intangible assets. Within the scope of the International Subsidiary Banks Division, support and guidelines are provided in defining plans for people's resilience in the event of a crisis, monitoring their training over time and coordinating their active readiness in operational terms, in collaboration with the relevant functions. Within the scope of the Group's Crisis Management Model, the relevant functions also collaborate for the management of critical situations also with a view to supporting operational continuity, as part of their remit. In the field of Travel Security, support is provided to mobility abroad, in addition to the analysis of country risk levels, through the adoption of appropriate methodologies. There is constant active monitoring of travellers abroad and/or Group expatriates, to mitigate any incidents and/or emergencies, also with the support of qualified partners.

With regard to the risks associated with predatory crimes, the CPS Function analyses and measures risks of robbery and theft including on-site checks on the level of protection of the most exposed sites. In 2022 within the perimeter of territorial locations of Intesa Sanpaolo in Italy there were 9 completed and 5 attempted robberies, compared to 1 completed and 3 attempted robberies in 2021. As regards the theft risk which generally, unlike robberies, does not impact on the health and safety of people, 12 attacks on ATM machines were recorded during the year (5 with success and 7 failed attempts). There was a reduction in the phenomenon of attacks on ATM equipment, performed using both physical techniques and joint physical and cyber techniques (15 attacks in 2021).

Another area being monitored as regards the risk to the physical safety of employees is that of aggressive attacks on the Group's staff, whose purpose is not robbery or theft. Measurement, analysis and containment actions in this area have been up and running for some time. The trend of the phenomenon has grown since 2018, the year in which the first survey was held, and also remains under observation by ABI in financial activities that involve contact with customers. In 2022, 264 cases of aggression were recorded (16 of which involving physical contact and the remainder with verbal abuse), compared to 240 in 2021 (21 of which involving physical contact). The mitigation actions involve training for personnel exposed to risk and those responsible for managing events, the collection of data about and the management of events (investigation, psychological support, legal action) with the contribution of the Banca dei Territori Division, the Workplace Safety, Environment and Energy Head Office Department, and the Legal, Criminal, Administrative Affairs and Business Crisis Head Office Department.