



Assurance Statement over the governance on Corporate Social Responsibility

Upon request from management at Intesa Sanpaolo Group - CSR function, Bureau Veritas Italia has performed an assessment of the Intesa Sanpaolo Group's governance on Corporate Social Responsibility, as an independent Third Party, against principles and content from ISO 26000 standard. Assurance activity has been performed in October 2019 - January 2020, representing an update of assessment performed during the six previous years. Following such assurance activities, Bureau Veritas Italia has produced this Assurance Statement as a result of an independent assessment. Bureau Veritas Italia has no other commercial interest in activities by Intesa Sanpaolo Group other than those related to this Third Party assessment.

Objective of the assessment

The activity of Bureau Veritas Italia was aimed at the assessment of the CSR governance in Intesa Sanpaolo Group. In particular, the Third Party assessment has been performed in order to determine whether and to what extent the principles of the Code of Ethics – with a specific focus on human rights – have been translated into a set of Policy, Responsibilities and Procedures, which enables implementation of such principles by the various company functions.

Scope of the assessment

Scope of the Third Party assessment covers both the Italian and the foreign perimeter. In particular: for the Italian perimeter, the assessment activities focused on the governance functions within Central Management, on a few functions of the Bank of Districts, of the Corporate Investment Banking Division and of the Insurance Division. For the foreign perimeter, the assessment considered the banks of the International Subsidiary Banks Division and the banks of the Corporate Investment Banking.

Assessment Methodology

Bureau Veritas Italia has focused its assessment on the following priority issues identified by Intesa San Paolo on the basis of the materiality analysis:

- ▶ Quality and innovation in customer relations
- ▶ Labor protection
- ▶ Welfare of employees
- ▶ Access to credit and financial inclusion
- ▶ Relationship with the Community
- ▶ Employee development
- ▶ Direct environmental impacts
- ▶ Green economy
- ▶ Responsible management of savings and customers' protection
- ▶ Integrity in company conduct

Milan – 31 January 2020

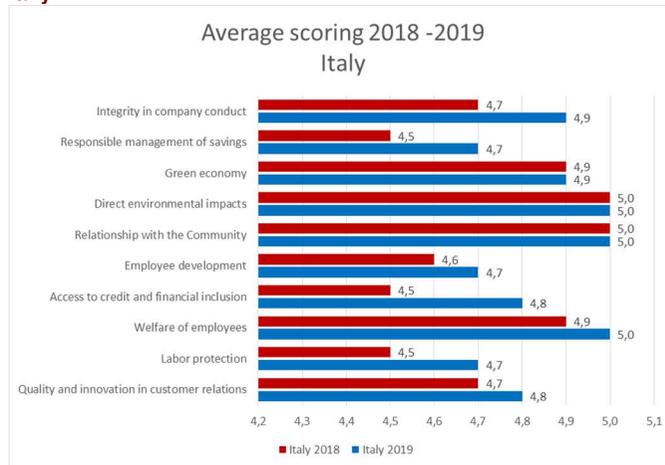
Giorgio Lanzafame – Local Technical Manager

Results

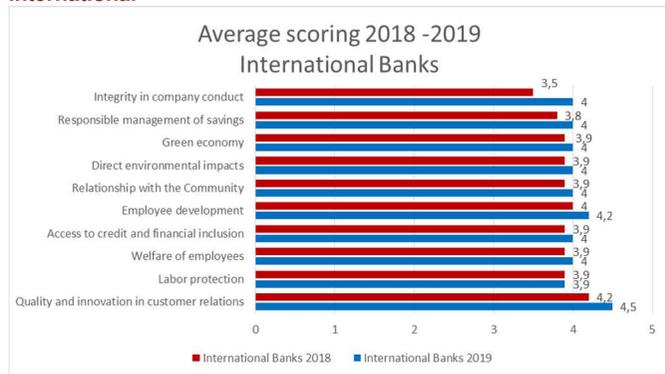
The assessment of the Governance was conducted according to the methodology of the UNI PdR 18: 2016, which led to express a judgment "Consistent and committed to excellence" with a score of 44 on a scale from 15 to 45. The assessment has appreciated a substantial improvement in the maturity of the CSR governance at group level. The introduction of CSR objectives within the Business Plan has accelerated the ESG integration in the business processes, including those related to the Insurance activity.

Below are the average results for each theme, both for Italy and for the International Subsidiary Banks, declined on a scale from 1 (minimum value) to 5 (maximum value) *.

Italy



International



* The scoring is based on a scale from 1 to 5, where:

1. The company's commitment to take action, ongoing feasibility assessments, but still lack of concrete actions and programs.
2. Concrete commitment, occasional, partial or purely on a reactive basis.
3. Structured, systematic commitment, focused on some priorities.
4. Structured, systematic commitment, extended to all areas and relationships. Completeness of the approach.
5. Structured, systematic commitment, extended to all areas and relationships. Completeness and innovation of the approach. Leadership towards the market and stakeholders in terms of social responsibility.

The assessment confirms the existence of regulations and procedures designed to protect the **human rights** listed in the related Policy, in relation to the main categories of stakeholders: employees, customers, suppliers and the Community.

The rating differential between Italy and abroad – which anyhow shows a positive trend - is motivated by the different regulatory context, especially with reference to some countries (eg Russia, Egypt).

Human rights aspects have been assessed through cross-section review of the following areas:

Issues	Aspects investigated	Average rating 2018	Average rating 2019
Labor Protection	Respect for people's rights in terms of employment protection and access to trade union representation	Italy 4,5	Italy 4,7
		International 3,9	International 3,9
Welfare of employees	Respect for the rights of people in terms of welfare and quality of life in the company, Health and safety of employees, Business climate	Italy 4,9	Italy 5,0
		International 3,9	International 4,0
Employee development	Respect for people's rights in terms of enhancing diversity	Italy 4,6	Italy 4,7
		International 4,0	International 4,2
Quality and innovation in customer relations	Respect for people's rights in terms of accessibility, customer protection, health and safety of the client	Italy 4,7	Italy 4,8
		International 4,2	International 4,5
Integrity in company conduct	Respect for people's rights in terms of privacy protection and respect for labor law	Italy 4,7	Italy 4,9
		International 3,5	International 4,0
Management of savings and customers' protection	Respect for human rights in investments, financing and financial relations	Italy 4,5	Italy 4,7
		International 3,8	International 4,0
Green Economy	Respect of human rights in financing	Italy 4,9	Italy 4,9
		International 3,9	International 4,0

Opinion of Bureau Veritas Italia

The third party assessment has appreciated a substantial improvement in the maturity of the CSR Governance at Group level, with a clear attribution of ESG competences to the Executive Committee. The scoring for Italy highlights an improvement in 7 out of 10 issues, taking into account that Direct Environmental Impacts had already achieved the maximum rating. In Italy, the governance of cross processes (human resources management, health and safety, management of direct environmental impacts, prevention of bribery, engagement for the Community) is confirmed to be robust and effective, with innovative elements. ESG considerations are embedded more clearly in the core processes, especially in Italy: credit granting, asset management, offer of insurance products. Considerable improvements have been made to strengthen the synergies with the foreign banks, where a few sectors (H&S and Environment) now functionally report to the corresponding function at central level. As regards the International Banks, improvements have been noted for all issues, except for Labor Protection where last year scoring is confirmed. The reporting process aimed at the Group Non Financial Disclosure is robust; in 2019 a half-yearly update has been introduced, covering the first six months of the year.