



Human rights

## RELEVANT ISSUES

The Intesa Sanpaolo Group has always been committed to protecting human rights, in line with the values set out in the Code of Ethics.

Aware that its activities have direct and indirect impacts on human rights, Intesa Sanpaolo has defined its areas of responsibility for each of its stakeholders. Indeed, it has considered its impact on its Group employees, customers, suppliers and the community. The environment is another issue closely related to the principles of human rights, and the promotion of high environmental standards must therefore be considered key to respecting and enjoying these rights.

As a cross-cutting issue that is relevant to various areas of the Group's operations, human rights are therefore touched upon throughout the Consolidated Non-Financial Statement, as summarised in the following table:

Stakeholder	AREA OF IMPACT	SEE PAGE
Group's People	Health and safety of workers and combating conditions of discomfort and stress	page 167
Group's People	Combating the harassment of employees	page 162
Group's People	Freedom of association	page 153
Group's People	Non-discrimination, equal opportunities and fair remuneration	page 159
Group's People	Family life through work-life balance policies	page 162
Group's People	Safeguarding social security with supplementary pensions	page 164
Customers	Policies and solutions for combating robberies	page 99
Customers/Group's People	Privacy of personal and sensitive data	page 84
Customers	Financial inclusion of the most vulnerable social groups	page 106
Suppliers	Inclusion of criteria for respecting human rights in the supply chain	page 147
Community	Assessing the respect of human rights on the part of customer companies, specifically regarding their employees, and in financed projects, in particular concerning the rights of the communities involved	page 68
Community	Culture and charitable activities promoting a respect for human rights	page 130
Environment	All	page 172

### WHY THESE ISSUES ARE RELEVANT

According to the UN Guiding Principles on Business and Human Rights, approved in 2011, the State has a duty to protect human rights and businesses must respect them wherever they operate (regardless of the ability or willingness of States to fulfil their obligations). Victims of abuse must also be able to access appropriate and effective remedies.

Indeed, through their activities businesses can have various types of impacts on human rights: positive ones, such as the supply of innovative services that improve people's quality of life; or negative ones, including the exploitation of workers, for example, or the forced displacement of people or entire communities. Businesses can also be indirectly involved in violations committed by other businesses or States.

In its role as an intermediary, a financial institution like Intesa Sanpaolo initiates a value chain that involves many different individuals, entities, businesses and States. For this reason, as well as observing the relevant legislation in force in all countries in which it operates, it is committed to identifying, mitigating and, where possible, preventing potential violations of human rights connected with its activities, as recommended by the UN's Guiding Principles on Business and Human Rights.

## PERFORMANCE INDICATORS AND RESULTS ACHIEVED

Approved by the Board of Directors in December 2017, the Group adopted a specific human rights policy which incorporates the principles already outlined in the Code of Ethics translating them into tangible commitments.

Indicators	Intesa Sanpaolo Group (excluding UBI Banca Group)		
	2018	2019	2020
Accidents in the workplace	260	268	173
Employees belonging to a union (% of total)*	66.0%	64.8%	64.2%
Part-time employees (% of total)	11.8%	11.9%	12.2%
Employees signed up to the flexible work scheme	over 11,500	approximately 17,250	approximately 65,500
Reports of non-compliance with the Code of Ethics for alleged discrimination	10	12	6
Court cases for mobbing**	0	2	3
Reports of alleged breaches of the Privacy Code (Italy)	115	77	101
Robberies - Number of events per 100 branches	0.26	0.46	0.12
Suppliers registered on the Supplier Gate*** (no.)	3,161	5,569	7,352
Projects subject to Equator Principles screening****:			
Number	20	11	10
Amount granted (millions of euro)	993	825	1,182
Donations for vulnerable and disadvantaged groups managed centrally (% of total)	92%	95%	92%

\* The industry National Collective Bargaining Agreement covers all employees in Italy. The percentage of employees working in Italy and covered by the Collective Bargaining Agreement for the Credit Sector who are also members of a trade union is 79.1%.

\*\* There are three ongoing disputes of current employees which include, among the claims, also those for mobbing.

\*\*\* All suppliers registered on the portal are subject to checks in the areas of business ethics and respect for human rights, workers' rights and environmental rights.

\*\*\*\* In 2020 the amount granted subject to Equator Principles screening stood at 78.4% of total project finance allocations.

## COMPANY POLICIES

Through the Group policy, Human Rights Principles, Intesa Sanpaolo pledges to:

- support the protection of human rights in accordance with the principles established in the Universal Declaration of Human Rights of 1948 and subsequent international conventions on civil and political rights and economic, social and cultural rights;
- recognise the principles established by the fundamental conventions of the ILO (International Labour Organization) and in particular the right of association and the right to collective bargaining, the abolition of forced and child labour, and non-discrimination in employment;
- contribute to combating corruption, supporting the guidelines of the OECD (Organisation for Economic Co-operation and Development) and the anti-corruption principles established by the UN in 2003, and also by taking a 'zero tolerance' approach to any eventual cases of corruption.

## THE PROCESS OF MONITORING HUMAN RIGHTS

The implementation and gradual extension of the protection of human rights is monitored by Corporate Social Responsibility through:

- monitoring the implementation and governance of the Group's Code of Ethics, also with third-party assessments in line with the international UNI ISO 26000 standard, with a specific focus on the areas related to human rights;
- the sustainability report, which involves stakeholders and defines improvement objectives and the relative metrics and is subject to the certification of an independent auditor outside the Group;
- the analysis of potential risk areas in the sphere of human rights which, for every principle in the international conventions, outlines the possible impacts of the company's operations on its stakeholders and the relative company regulations.

Taking into account the results of the monitoring process, Intesa Sanpaolo pledges to:

- assess whether the policy needs updating;
- define guidelines for actions aiming to prevent and mitigate possible negative impacts on its stakeholders;
- issue, if necessary, further documents on specific rights and activities.

As a further guarantee for all stakeholders, anyone that wishes to report an incident of non-compliance can write to the Code of Ethics email address ([codice.etico@intesasnpaolo.com](mailto:codice.etico@intesasnpaolo.com)), anonymously and without fear of reprisals. As regards reports of alleged human rights violations received in 2020, see page 61.

Human rights issues have, once again this year, been subject to third-party verification in accordance with the principles and contents of the ISO 26000 standard. The certification in 2020 shows a further increase in the assessment compared to 2019, thanks to the existence of regulations, procedures and best practices that go beyond mere regulatory compliance, capable of protecting the human rights listed in the related policy, in relation to the main categories of stakeholders. In particular, this year the Group stood out for the actions and measures put in place in order to protect its employees and customers during the COVID-19 pandemic, focusing first and foremost on its people as well as prioritising their health, safety and well-being. In addition, with a view to fostering inclusion and proximity to the most vulnerable situations, support was also provided, with different methods and actions, to communities, families and businesses to counter the effects generated by the difficult economic and social context that characterised 2020 (for more information, see page 23). Among the aspects showing room for improvement, the following are confirmed: the opportunity to strengthen monitoring measures on all service providers involving the presence of supplier personnel at Intesa Sanpaolo offices (Supplier stakeholders); the opportunity to give greater evidence in the reporting on the processes currently in place to investigate and evaluate the respect of human rights by the beneficiaries of credit and financing interventions (Community stakeholders).

Human rights aspects were checked across all areas, with regard to the following issues:

Issues	Aspects addressed	Average rating of issues 2019 (0-5)	Average rating of issues 2020 (0-5)
Employment protection	Respecting individual rights in terms of protecting employment and access to trade union representation	Italy 4.7	Italy 4.7
		Abroad 3.9	Abroad 4.0
Health, safety and well-being of the Group's people	Respecting individual rights in terms of welfare and quality of life in the company; employee health and safety; working environment	Italy 5	Italy 5
		Abroad 4	Abroad 4.2
Retention, enhancement, diversity and inclusion of the Group's people	Respecting individual rights in terms of enhancement of diversity	Italy 4.7	Italy 4.7
		Abroad 4.2	Abroad 4.2
Quality of service and customer satisfaction	Respecting individual rights in terms of accessibility, customer protection, and customer health and safety	Italy 4.8	Italy 4.8
		Abroad 4.5	Abroad 4.7
Integrity in corporate conduct	Respecting individual rights in terms of the protection of privacy and compliance with labour laws	Italy 4.9	Italy 5.0
		Abroad 4	Abroad 4.1
Sustainable investments and insurance	Respecting human rights in investments	Italy 4.7	Italy 4.8
		Abroad 4	Abroad 4.1
Transition to a sustainable, green and circular economy	Respecting human rights in loans	Italy 4.9	Italy 5.0
		Abroad 4	Abroad 4.1

Note: the Abroad Rating is the average of the scores obtained by the Banks within the International Subsidiary Banks Division.

The issues rating difference between Italy and abroad has to be interpreted considering the different regulatory and social environments, with particular reference to certain countries.