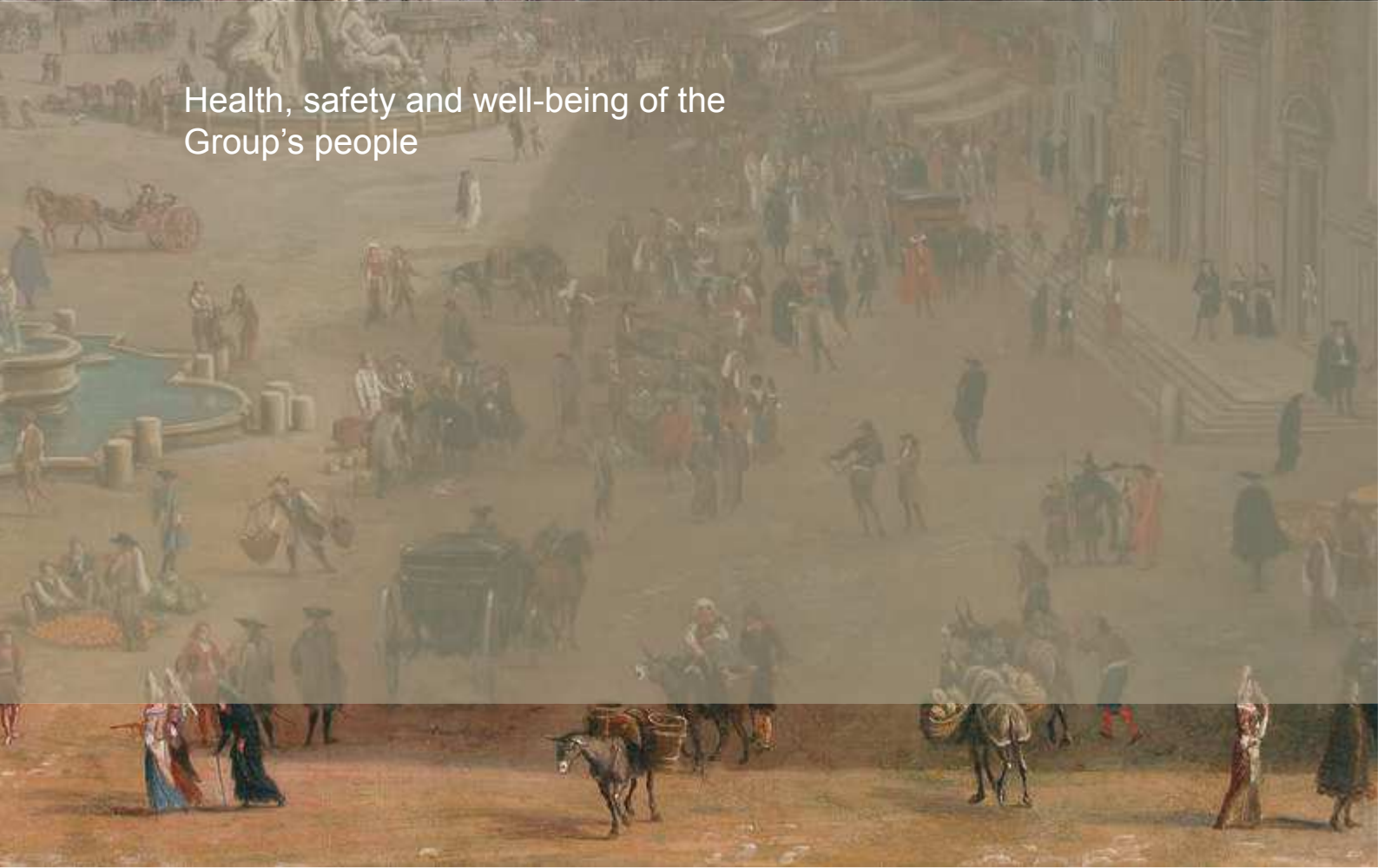




Health, safety and well-being of the Group's people



Health, safety and well-being of the Group's people

RELEVANT ISSUES

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WHY THESE ISSUES ARE RELEVANT

The definition of tangible approaches, policies and measures for the development, management and strengthening of a modern and integrated corporate welfare system, which is also key to maintaining high levels of satisfaction for its employees, is of fundamental importance for Intesa Sanpaolo. The programmes adopted to date, also thanks to the numerous agreements signed with the Trade Unions, have made it possible to introduce and consolidate numerous innovative contractual tools, which are able to foster the development of an effective company welfare system and establish a better work-life balance. In addition, since some time Intesa Sanpaolo has also adhered to an Occupational Health and Safety Management System compliant with the most advanced international standards and, in 2021, it implemented it further in order to deal with the COVID-19 epidemiological emergency with the development and the application of an infection risk management protocol aligned with national and international best practices, as certified by the assessment of a certifying body, which rated it with the highest possible level of maturity.

PERFORMANCE INDICATORS, RESULTS ACHIEVED AND OBJECTIVES

| Macro-issue | Projects/Indicators | 2021 Actions/Results (cumulative value since the start of 2018) | 2021 objectives | |
|--|---|---|--|--|
| Welfare and quality of life in the company | Smart Working | <ul style="list-style-type: none"> ▪ Approx. 78,000 people eligible for flexible working | <ul style="list-style-type: none"> ▪ Flexibility programmes to improve staff productivity and satisfaction: smart working extended to 24,000 people in 2021 | |
| | "Vetrina dei Servizi" Store on #People | <ul style="list-style-type: none"> ▪ Over 500,000 pages visited in 2021; almost 90% of the Italian population used the portal | | |
| | Consultation and Support | <ul style="list-style-type: none"> ▪ Over 1,700 service accesses in 2021 | | |
| | CareLab/#Stepbystep | <ul style="list-style-type: none"> ▪ Over 487,000 views in 2021 and almost 60% of the population benefited from the digital opportunities presented on CareLab ▪ Approximately 6,600 downloads of the #Stepbystep app dedicated to movement in 2021 | | |
| | ALI (Associazione Lavoratori Intesa Sanpaolo) | <ul style="list-style-type: none"> ▪ Over 160,000 members ▪ Around 5 million euro to support free time initiatives | | <ul style="list-style-type: none"> ▪ Promotion of welfare and work-life balance |
| | Group health fund | <ul style="list-style-type: none"> ▪ Approx. 152 million euro of intermediate healthcare services net of excesses ▪ Over 210,000 people assisted | | |
| | Supplementary pension scheme | <ul style="list-style-type: none"> ▪ Over 121,000 subscribers to all Group Funds (Defined Contribution and Benefit) ▪ Approx. 12 billion's worth of assets | | |

PERFORMANCE INDICATORS, RESULTS ACHIEVED AND OBJECTIVES

| Macro-issue | Projects/Indicators | 2021 Actions/Results (cumulative value since the start of 2018) | 2021 objectives |
|-------------------|---|---|---|
| Company climate | Internal climate analysis | <ul style="list-style-type: none"> The climate survey conducted in 2021 registered a Group satisfaction index of 79% (77% in 2019) | |
| Health and safety | Injuries | <ul style="list-style-type: none"> At work: 194 While travelling: 332 Employee injury rate: 0.5% | <ul style="list-style-type: none"> Protecting Group's people health and safety |
| | Health and Safety Management System Certification | <ul style="list-style-type: none"> The certification attesting to the conformity of the Occupational Health and Safety Management System with the UNI ISO 45001:2018 standard, which covers 100% of the Intesa Sanpaolo branches and buildings in Italy, was confirmed | |
| | Health and safety training | <ul style="list-style-type: none"> 37,046 participants in health and safety training; 195,500 hours provided | |

COMPANY POLICIES

In terms of relationships with Group's people, the Intesa Sanpaolo Code of Ethics promotes policies that help foster a better work-life balance; the concrete implementation of this principle takes the form of specific rules in this area. Welfare is a priority area with actions designed to foster motivation and involvement, placing people at the centre with the aim of meeting their needs and those of their families. Accordingly, the meetings between the company and the Trade Unions have often centred on policies to strengthen and fine-tune the instruments that make up the company's welfare package and significantly contribute to improving the work-life balance of Group's people and, as such, also their well-being. Well-being that is also protected through the safeguarding of health and safety in the workplace via increasingly effective measures, as outlined in the Group's Health and Safety Policy and Code of Ethics. The internal regulations establish a System of Duties and Responsibilities, further strengthened to deal with the COVID-19 emergency, in the format of company rules and operating guidelines affecting many different parties - with regard to particular professional skills, i.e. specific corporate functions.

WELFARE AND QUALITY OF LIFE IN THE COMPANY

Intesa Sanpaolo has chosen a corporate welfare model that operates within an integrated system and includes: the supplementary pension scheme, supplementary health care, the Cultural, Recreation and Sports Association for Intesa Sanpaolo Group Employees (ALI), the Intesa Sanpaolo Onlus Foundation, as well as the coordination of the inter-functional group Disability management, the activities relating to the individual and work/life balance and the set of Mobility management activities (see page 201). The company welfare system seeks to address the key issues in order to establish the best possible work-life balance for Group's people and their families. It does this by promoting sustainable solutions and projects consistent with their expectations. The activities are managed and monitored by the Labour Affairs and Policies Head Office Department.

Introduced in 2015, Flexible Working is the smart working model of the Intesa Sanpaolo Group. From the initial phase to its consolidation as an ordinary working method, Flexible Working has gradually involved an ever-increasing number of structures and employees, in 2021 proving to be a winning model in the organisation of work and an effective tool also with a view to business continuity, in the context of the COVID-19 emergency. In order to make it possible to extend Flexible Working also to structures not previously included or with strong operational or technological constraints, Intesa Sanpaolo has accelerated the supply processes of IT equipment and reviewed the organisational processes. With the trade union agreement dated 11 June 2020, the option to join the Flexible working scheme was activated for all Group's people with children under the age of 14, in all roles and/or duties, including in-Branch, providing for the right to use at least one day of remote working from home per week, if requested. At the end of 2021, approximately 78,000 Group's people were eligible for Flexible working.

Another innovative tool is the Time Bank, a reserve of time made available by the company and Group's people so they can provide greater support for employees in difficulty, even for brief periods, and give them more time. It is also an initiative that appeals to our generosity and spirit of solidarity because, in addition to the hours made available by the company, with an initial reserve of 65,000 hours, every person has the possibility of donating some of their leave or holidays to the bank, which the company will then match, up to a maximum of another 100,000 hours in total. This option was extended as part of the renewal of the second-level bargaining agreement in 2021, providing for the possibility of it being used also for assistance to the elderly (over 75 years of age) or dependent persons (family members and relatives within the first degree), and introducing, by way of an experiment, for the 2022-2023 two-year period, a total number of hours to assist spouses, family members and relatives up to the second degree during surgical procedures. In 2021, over 21,000 hours were donated by Group's people, which were topped up with the same number of hours by the company, for an overall total of 116,000 hours.

Within the scope of the International Subsidiary Banks Division, the Banks, by leveraging on the experience of the COVID-19 emergency and with the contribution of internal surveys, launched new projects and flexible working models, in line with the provisions laid down by local laws. More specifically, in 2021, VÚB Banka, CIB Bank, Intesa Sanpaolo Bank Albania and Intesa Sanpaolo Bank Slovenia implemented new flexible working projects and models, while they are in the planning phase in PBZ and BIB. The common threads of these initiatives are the identification of a target number of days to work from home, the redesign of the layout of company office spaces on the basis of the new needs and the extension of flexible working to more people, which at the end of 2021 made it possible to extend the target population to a total of approximately 12,000 employees.

Maternity and paternity support is provided through an excellent company crèche service in Florence, Milan, Moncalieri, Naples, Turin, Brescia and Bergamo, which looks after 330 children, and a network of partner crèches right across Italy.

In 2021, the renewal of the second-level bargaining Group agreement made it possible to consolidate and strengthen the tools designed to provide parental support. Fathers can request specific additional paid leave for the birth of their children, which was doubled starting from April 2021 on the occasion of the harmonisation process of the UBI Group into the Intesa Sanpaolo Group. In addition, fathers are granted a 10% allowance of the sum granted by law for parental leave, and the possibility of taking 10 days of parental leave paid at 30% of their individual gross annual remuneration, additional days of unpaid leave and leave of absence for the illness of a child or for childcare reasons. The series of regulations on parental rights covers specific paid leave to settle children in at crèches or pre-school, to take them to the emergency room, if needed, and extra days of unpaid leave to care for underage children for separated or divorced parents, the exclusive guardians of children, as well as in the cases of widowhood and single-parent families. The size of the cheque that the Company pays to Group's people with disabled family members also increased. The Agreement for the Integration of the UBI Group into the Intesa Sanpaolo Group introduced a series of measures for Group's people under 30 (Youth Package), which include, in addition to the increased employer supplementary pension scheme contribution for the first 5 years from hiring, a "primary residence bonus" and a "child birth bonus" payable within the first 10 years of hiring. On the occasion of the renewal of the Second-Level Collective Bargaining Agreement, a new welfare contribution was introduced for each child up to the age of twenty-four by way of a payment to the supplementary pension scheme position in the name of the same child, also providing for the possibility of using the amount by way of reimbursement through the "Share Capital Account".

With the UBI transaction, the Group's supplementary pension scheme system reaches total assets of over 12 billion euro for over 121 thousand members. As part of the UBI Group integration process, with the signing of specific trade union agreements, the Defined Contribution Pension Fund and the Intesa Sanpaolo Group Defined-Benefit Fund will be used to provide the over 22 thousand members of UBI Pension Funds with the pension benefits provided for by the related articles of association/regulations, investment lines consistent with their risk profile as well as an increase in choice options and in the minimum percentage of the amount paid by the company to 3.75%. In this context, the membership proposal led almost all UBI employees enrolled in other Pension Funds (whether open-ended or category) to sign up to the Defined Contribution Pension Fund of the Intesa Sanpaolo Group. Contribution Pension Funds offer their members a wealth of investment options, allowing them to choose their ideal allocation based on individual needs, including across multiple sectors. Particular attention was then paid to ESG issues. The contribution Fund provides its members with ancillary insurance coverage on particularly favourable terms and conditions. Dependent family members can be registered and the Fund membership can be maintained even upon termination of the employment relationship. The reserved are has been fine-tuned further, allowing members in particular to conduct simulations in order to work out the expected net amount in the event of a claim for advances and services. In relation to the COVID-19 emergency, the Bodies and operating structures of the Group Funds continued to work to maintain and defend the income targets of each sector, with the interventions that became necessary in the interest of its members for the protection of pension savings.

THE GROUP HEALTH FUND

The Intesa Sanpaolo Group Health Fund is an NPO that operates on the basis of cooperative and social solidarity values, appointed to manage supplementary health care services for all Intesa Sanpaolo Group employees, as well as former employees on leave and retired employees who were subscribers and their family members. In 2021, operations fully resumed following the disruptions caused by the pandemic; the services provided are estimated to amount to around 150 million euro. The cancer prevention campaign recorded more than 56 thousand views on the portal. On 5 November 2021, the Fund Founders signed an agreement that reforms the Health Fund and further qualifies its assistance and mutual aid mission. The Mixed Fund Management was set up for self-employed professionals working in Group companies under agency contracts and for pensioners who choose "high risk" health insurance coverage, along with the Protection Fund Management dedicated to prevention. New forms of long-term care (LTC) were introduced to provide support in the event of loss of self-sufficiency in favour of spouses and members who are not beneficiaries of the LTC laid down by the credit National Collective Bargaining Agreement. Significant service improvements were made for members in service as well as for retired members: reduced deductibles under approved network services, higher caps for hospitalisations/surgical procedures, dental treatments, physical/psycho-therapies and ophthalmological expenses. Long-term hospitalisation and medically assisted human reproduction were subject to improved regulations. Solidarity between fund managements was strengthened, thereby allowing more flexible uses of assets in the event of a deficit. The agreement also regulated Fund membership of current and retired employees and retirees from the former UBI Group: approximately 40,000 people considering the members and their respective families.

In 2021 the International Subsidiary Banks Division once again renewed the International Healthcare Programme initiative, which provides a total of over 19,000 international employees with permanent contracts (the cover was also extended to Eximbank during the year), second medical opinions (also extended to spouses and school-age children) and/or medical treatment in top-level health facilities (for employees only) located in foreign countries to those where employees live and/or work. The programme provides assistance in the event of serious illnesses (cancer, transplants, highly complex surgical procedures etc.), covers treatment and complementary service costs (visa assistance, hospitalisation, accommodation for an accompanying person, travel etc.), all transport and accommodation expenses in the foreign country, and reimburses all medical costs borne once back home. Given the travel restrictions imposed by the pandemic, alternative solutions were adopted which in some cases involved treatment in the country of residence.

Since 2014 ALI (Associazione Lavoratori Intesa Sanpaolo) has been the only Group association in the Group Welfare System. ALI proposes aggregation, tourism, culture and sport initiatives and personal services to over 160 thousand members, a figure reached with the integration of the UBI Group. In 2021 as well, the pandemic had an impact on ALI's activities, however some in-person initiatives resumed, with special emphasis being placed on local tourism and cultural proposals for the enhancement and rediscovery of the local territories. ALI set itself the goal of implementing, among other things, various programmes aimed at achieving some of the objectives set out in the UN Agenda 2030. The "Le Foreste di ALI" initiative enabled over 1,400 trees to be planted on the land of nine social cooperatives, generating social and environmental impact (SDGs 8, 10, 13 and 15). With the course on Support Administration, a service was offered to members involved in the assistance of people with disabilities, with a view to promoting social inclusion (SDG 10). In line with the objectives aimed at improving the living conditions and safety of cities and roads and at combating climate change, ALI provides financial contributions for sustainable mobility and to encourage the purchase of public transport passes on the Intesa Sanpaolo Mobility Office (SDGs 11 and 13). In the realm of culture, ALI based the literary contest "RACCONTALI" on the SDGs, inviting members to create stories on the theme "Scegli il tuo Obiettivo e libera la tua storia per un mondo da favola" (Choose your Goal and free your story for a fairytale world), and produced a theatrical documentary "Divina Commedia Criminale" (Criminal Divine Comedy) in homage to Dante's genius. To encourage movement and reduce sedentary lifestyles (SDG 3), the Gympass and Fitprime offerings were expanded with online activities; contributions were disbursed for competitive sports certificates issued by physicians and to sign up for sports or leisure courses and a number of national initiatives such as the Interbank Racing and the Team Tennis Open were resumed. In the context of Personal Services, the psychological support service continued, in collaboration with STIMULUS, along with the free activation of personalised advice on social welfare and educational services: "Welcare Family", coordinated by Welfare Come Te in conjunction with the wide range of services and contributions dedicated to families with children. With regard to special agreements reserved for Members, the offering was expanded with a focus on products for COVID-19 protection and on food products (Destination Gusto) and at Christmas, gift cards were offered to Members to choose from among those proposed by ALI leading partners.

Through the Intesa Sanpaolo Onlus Foundation, work continued to combat the economic and social hardship of employees, former employees and retirees of the Group in objective and proven situations of difficulty, support for the right to education continued to be provided to disadvantaged students, along with the provision of selected PhD scholarships in humanities. Uninterrupted support also continued to be provided to Third Sector Entities which, with targeted projects, operate directly in the area of solidarity and welfare in favour of the most fragile categories. The sum set aside by the Board of Directors in 2021 came to around 2.5 million euro, and included a significant allocation for initiatives such as canteens and dormitories for the poor and needy.

PEOPLE CARE

People Care confirmed its relevance, also in light of the close correlation with ESG issues and the continuing pandemic situation, placing well-being support and the improvement of the Group's employees' quality of life at the centre of the actions undertaken, in full consistency with the 2018-2021 Business Plan. As in previous years, the activity was based on the "Service Model" with four pillars: enhancement of the offering of services to the people within the company, active consultation and analysis of the needs of company employees, monitoring of the leading companies in People Care systems, implementation and development of the offering of new services. In particular, efforts were focused on Vetrina dei Servizi and CareLab, platforms with initiatives designed to live well-being experiences in response to personal and professional needs which, together with the Consultation and Support service, aim to bring out people's full potential, increasing their involvement and satisfaction and, consequently, productivity. Once the structure of the well-being service offering was completed in 2021, starting from 2022 People Care will also promote well-being in the physical dimension of the company spaces, in full keeping with the Next Way of Working project. Specific initiatives will then be launched to promote the importance of adopting well-being as a lifestyle among the company population, also and above all through the use of all the practical tools made available by the company, such as dedicated apps and platforms. Thanks to the technology at the service of people's well-being in the company and the benefits generated by CareLab, Vetrina dei Servizi and Consultation and Support, at the end of 2021 Intesa Sanpaolo was awarded by the Brandon Hall Group - a research and analysis company with the mission to enhance excellence in organisations around the world - a silver medal in the Best Advance category in Corporate Well-being Technology at the 2021 Technology Excellence Awards. In the pandemic context, where distance and isolation reinforced the need for support, the aim was to strengthen CareLab, the platform entirely focused on well-being available free of charge for the entire Group since May 2020, with over 500 published objects, educational content, initiatives and services and twenty-six webinars, also available on demand, held with experts and spokespersons on all aspects of well-being (nutrition, movement, energy and emotional well-being and caregiving). The implementation of tools and services to support the adoption of "good practices" in daily life was completed: 4Fooding, the web App with recipes, menus and a team of nutritionists for the improvement of daily eating habits, the 21days web App to train habits promoting well-being and generate energy, positivity, concentration and time for self-care and ABCcare, the platform dedicated to the care of frail elderly people, with the assistance of a team of professionals and personalised online services. These new services complement the existing ones: the online gym, a platform with a rich schedule of live and on-demand lessons with expert and qualified trainers for the whole family of Group's people and #Stepbystep, the App that encourages movement and a healthy lifestyle, which in July 2021 launched a brand-new release with more engaging graphics and features to ensure greater interaction and initiate team building initiatives. Tailor-made initiatives were also launched to meet the specific needs of certain Group structures in the wellness area. Consultation and Support, a psychological support service available since March 2020 for all Group's people in Italy, was extended to the Group's international subsidiary companies in 2021: it is currently available at the corporate branches in London, Paris and Frankfurt, but further openings are planned. The service, designed to provide immediate, professional and confidential support to deal with times of difficulty and work on one's inner balance and personal well-being, is totally free of charge and is accessible through various methods, by telephone and via the dedicated web platform. In addition, the training course, launched at the end of 2020, entitled "Ascolto del disagio: l'ascolto attivo come strumento di supporto e gestione dei colleghi in difficoltà" (Listening to hardship: active listening as a support and management tool for employees in difficulty), intended for personnel working in human resources, with teaching provision from the A. Gemelli Postgraduate School of Psychology of Cattolica University of Milan, was implemented and concluded at the end of 2021, involving 136 people with different managerial roles. The course was preceded by webinars within the HR School, involving around 400 employees. In 2021 the activities relating to Vetrina dei Servizi focused on its extension to new perimeters. Priority was given to former UBI employees following the integration. Now the platform, which hosts all the services dedicated to

people with a global view and responds to their needs, and which can also be viewed by personal and professional life cycle, is also being extended to other employees of the various Group companies, such as in the insurance domain, who are subject to a contract type other than the banking one. The portal was therefore improved in terms of its functionalities in order to allow a view of the services available by cluster of people who are entitled to them.

Within the scope of the International Subsidiary Banks, the initiatives launched in 2020 during the COVID-19 emergency period and aimed at mitigating the effects of stress and promoting employee physical and mental well-being, as well as maintaining a sense of belonging, continued both at the Division Head Office level and at the local level. Among the various proposals, 3 Masterclasses and 12 practical sessions from 3 disciplines (Movement, Face Yoga and Pilates) were held with certified instructors, focused on posture, flexibility and concentration, which involved 465 people belonging to the Head Office and to the 11 international Banks.

COMPANY CLIMATE

The Intesa Sanpaolo Internal Communications Service is responsible for developing a common culture based on corporate values and fostering the sense of belonging of employees. An integrated system which, as well as the structured consultation of Group's people, is made up of instruments like the Intranet, Web TV, Mosaico, Mosaico International and the interComm App which foster the continuous sharing of information, engagement, the sharing of objectives and active participation in changes. These tools played a crucial role in guiding the integration of UBI employees through constant information on the various stages of the process and the messages conveyed by the top management. A key moment was the Climate Analysis, which detects, every two years, the perception of the Intesa Sanpaolo Group's people, in Italy and abroad, with quantitative tools. The 2021 climate analysis was conducted in July, with the methodological consultancy and operational support of a third-party company which guarantees the total anonymity of the survey respondents and which, for the first time, also gave the opportunity to blind people to participate in the survey online through the provided screen reader. Three peculiar aspects characterised the 2021 survey:

- the first 6 questions of the questionnaire were dedicated, similarly to what was done in 2017 in preparation for the previous Plan, to a collection of ideas and key words "Insieme per il Piano d'Impresa 2022-2025" (Together for the 2022-2025 Business Plan);
- it was the first Climate Analysis since the onset of COVID-19: the results of a benchmark reveal that in Italian banks, and in all Italian companies, between 2019 and 2021, a positive effect was paradoxically recorded on the working environment concurrently with the pandemic; in particular, in times of difficulty and hardship, people were more appreciative of the mere fact of having a job, a salary, colleagues and bosses, as well as an orderly organisation;
- in Intesa Sanpaolo, this positive effect was mitigated by another event with a negative impact on company climate: the integration of UBI. Even with previous mergers it was found that the impact takes 6-12 months to be absorbed.

The results of the survey showed that in Italy 62.3% of people in the Professional Areas, Middle Managers and Executives answered the questionnaire, and 55.7% in the International Subsidiary Banks, with a Group satisfaction index of 79%. Intesa Sanpaolo's people confirm their satisfaction with their relationship with colleagues and, compared to 2019, the ratings on their relationship with bosses, salary, bonuses and prestige increased. They also have the perception of an increasingly secure workplace that is a source of pride. They share the company's vision and culture, are proud to work for it and confirm their appreciation for their direct bosses and the top management. Only one point of attention was raised: excessive bureaucracy/inflexibility. Structured listening - as a tool for supporting the Top management and the company structures with regard to issues and specific requirements or project activities - is not just limited to the internal Climate Analysis. This year as well, the listening activities and projects (feedback, surveys, focus groups, interviews, etc.) in Italy and abroad, amounted to over 60 and involved almost all the employees of the Governance Areas, Divisions and companies of the Group in Italy.

HEALTH AND SAFETY

The Safety and Protection Department is responsible within the Group for overseeing health and safety activities. Intesa Sanpaolo has adopted and successfully implemented an Occupational Health and Safety Management System identifying, within its organisational structure, responsibilities, procedures, processes and resources for implementing its policy on the protection of Group's people. With this in mind, the Health Surveillance and Psycho-Social Risks Office was set up to guarantee ever greater monitoring of activities relating to occupational medicine (health surveillance, accident and occupational disease analysis, health emergency management), as well as psycho-social risks. In particular, the methodologies and experimental tools for the analysis and assessment of emerging risks relating to technostress, cognitive overload and ageing developed in 2019/2020 as part of the Health and Safety 4.0 Project, were further refined and tested on a sample of approximately 2,500 Group's people. The results of the test were presented during a seminar organised by the Intesa Sanpaolo Innovation Center Neuroscience Lab in collaboration with the Safety at Work and Environment Head Office Department and Scuola IMT Alti Studi Lucca.

With the aim of enhancing the health and safety protection of its people, since 2017 the Occupational Health and Safety Management System has undergone an annual audit by an independent third party which certifies its compliance with current legislation and industry standards (UNI ISO 45001:2018). The responsibilities and methods associated with the implementation, maintenance, monitoring and improvement of the Occupational Health and Safety Management System (OHSMS) are outlined in the Process Guide - Compliance Management - Management of Occupational Safety Regulations, updated in 2018 and currently under review. The Guide was produced with the goal of reducing the possibility of any harmful event occurring that impacts people, the environment and relevant external parties, monitoring risks in the operations of the company and external businesses involved in the company's activities, and gradually improving the Group's performance in occupational health and safety. The risks to the health and safety of Group's people are evaluated according to a multidisciplinary approach, considering the combined effect of the working environment, processes and equipment as well as the subjective conditions of workers. The health and safety risk management process comprises the following phases:

- identification of dangers and their classification;
- risk assessment;
- identification and preparation of prevention and protection measures and procedures;
- definition of an action plan as part of a programme to guarantee the improvement of safety levels over time, with the identification of the competent company structures;
- realisation of the planned measures as part of the programme;
- definition of worker information and training programmes;
- monitoring of the implementation of the programmes and checks on the application and effectiveness of the measures adopted;
- management of residual risks.

Intesa Sanpaolo (as Employer) – with the collaboration of the Head of the Prevention and Protection Service and the Occupational Health Doctors and following the consultation of the Workers' Representatives in charge of Safety - drafts and updates the Risk Assessment Document which contains, among other things:

- identification of dangers and their classification;
- specification of the prevention and protection measures implemented and the individual protection equipment adopted following the assessment;
- the programme of measures considered appropriate to ensure that safety levels improve over time;
- an outline of the procedures for the implementation of the measures, as well as the company roles responsible for this.

The assessment and the associated document are updated on the basis of technical developments as well as significant changes to the production process and organisational structure of the company that may impact on the risk exposure of workers. This commitment was fulfilled in 2021 as well, with the updated document provided to all Group's people. Following a 2016 union agreement the Group's Worker Safety Representatives (WSR) were elected. Their areas of responsibility are defined on a geographical basis. The representation currently consists of 112 people, including those from UBI Banca, who account for almost 100% of employees. Every year dedicated training activities for Group's people are held to update the WSR. The new trade union agreement of 14 April 2021 confirmed the WSR structure and, on this basis, new elections were held for the WSR (96) who will be operating from 1 January 2022. Thanks to this series of activities it was possible to make the procedures for consultation and participation in the overall health and safety management system fully operative, as established by the regulations.

THE MANAGEMENT OF THE COVID-19 EMERGENCY IN THE COMPANY

In 2021 as well, the risk assessment was strongly impacted by the COVID-19 pandemic and the consequent implementation of the biological risk assessment: the ongoing analysis of the constantly evolving national legislation - to which full compliance was always guaranteed - was crucial. For the assessment of the risk during the pandemic, the Safety and Protection Department relied on the Group's Occupational Health Doctors coordinated by the Director of the Occupational Medicine Unit of Asst Fatebenefratelli Sacco and by the Coordination Director of the Occupational Medicine Outpatient Unit of the Azienda Universitaria Ospedaliera Città della Salute e della Scienza di Torino. Moreover, for the aspects relating to plant and environmental conditions and protection systems, it relied on the professors of the Department of Public Health Sciences of the University of Turin and of the Department of Medical and Surgical Sciences of the University of Bologna.

The assessment and the consequent mitigation measures are adopted in full compliance with national and regional regulations, they refer to international (WHO, ECDC) and national (ISS, INAIL) guidelines and indications and adhere to the content set out in the "Shared regulatory protocol of measures to combat and contain the spread of the COVID-19 virus in the workplace" signed between the Government and company members (for the banking sector, reference is made to the "Shared Protocol" between ABI and the Trade Unions).

This gave rise to the need to update the "Risk Assessment Document" (DVR) to keep track of the actions implemented. Among other things, the assessment made use of the INAIL methodology ("Technical document on the possible remodulation of measures to contain SARS-CoV-2 infection in the workplace and prevention strategies").

The Occupational Health and Safety Management System, headed by the Employer, is an integral and decision-making part of the Emergency Unit set up to deal with the COVID-19 emergency in accordance with the Crisis Management Model (MOGC). The pandemic risk is already among the scenarios envisaged by the model (Business Continuity Guidelines). In this context, in order to monitor the level of epidemiological risk, a contagion monitoring model was set up with weekly reports in support of decision-making. These factors make it possible to react promptly and, where possible, preventatively with respect to the provisions set forth by the legislator in the evolution of the crisis and allow the definition of increasingly stringent measures to anticipate the evolution of the epidemiological situation.

Extraordinary human and financial resources were made available for the implementation of the action plans, with over 20 qualified physicians supported by two coordinating physicians with whom internal measures were developed to limit the spread of the virus, along with protection initiatives for vulnerable people and for the management of COVID-19 cases.

The main actions are set out below:

- Organizational measures: to ensure the reduction of personal contacts and social distancing, according to the "zoning" rules (red, orange, amber zones), the measures put in place included specific closures and reopenings of offices, flexible working hours and shifts, extended flexible working from home and the digitalisation/remote working for employees; for customers, a system of restricted admissions was introduced, with specific appointments, the definition of essential transactions to be performed face-to-face and the extension of multi-channel services; specific access management procedures for suppliers and consultants, with interference evaluation; the per capita space available to all staff was increased with dividers and fewer workstations, the conditions for the formation of gatherings were eliminated, providing precise rules and prohibitions for meetings, events and access to company canteens, as well as specific rules and restrictions for mobility to and from areas at greatest epidemiological risk in terms of transfers and missions, the control system was strengthened.
- Behavioural and training measures: hygiene practices and codes of conduct were introduced by informing and empowering personnel through appropriate signs, guidelines, videos, infographics and links to reliable and corporate websites.

In order to serve as a training and information measure, a section dedicated to COVID-19 is available on the home page of the company intranet, which collects the regulations issued, the material produced by the WHO, ISS and other authoritative institutional and health sources, guidelines for safe flexible working, guidebook on the perception and management of the COVID-19 risk, manuals for the management of work environments and the behaviours to be followed during work activities, infographics, videos and information series on how to care for health and digital work management. In addition, courses were provided in relation to the protocol for the management of antigen tests at the Group's offices and travel security rules for personnel travelling abroad. In line with the Italian Banking Association-trade unions shared protocol for "measures to prevent, contrast and contain the spread of the COVID-19 virus", all

face-to-face courses were suspended. Since September, in-person classrooms have resumed solely for occupational health and safety courses that require practical activities to be conducted, while the other courses were reorganised to allow for remote provision.

- **Technical measures:** specific instructions were defined for environmental hygiene, including daily cleaning and deep cleaning of workplaces, sanitisation according to ministerial guidelines and management of air treatment systems; aids such as health equipment and Personal Protective Equipment (PPE) were provided, also differentiated on the basis of specific needs (face masks for deaf people), plexiglass screens, etc. according to principles of rationality and progressiveness and setting up different kits according to the locations open to the public, the need to liaise with customers and internal activities.

The Company Emergency Plan was also revised, along with intervention and first aid procedures, the cover of employees in the branches and in head office department buildings and the safe organisation of the annual evacuation drill both for fire prevention at all the Group's offices, and for earthquake drill in the offices located in seismic zones 1 and 2.

- **Medical measures:** the support of Occupational Health Doctors was enhanced to minimise the impact of new cases in the company, identify the personnel to be placed on leave, provide general medical information to all personnel and evaluate readmission to the workplace. A guided system was put in place for the entry of COVID-19 related reports, with the reporter being requested to provide the information strictly necessary for the management of the case and immediate feedback on the report, containing the indication of any abstention, the instructions for the necessary obligations to be fulfilled and information for the safety of employees and family members: the system allows for the acceptance and first management of reports relating to presumptive or confirmed positive results following diagnostic tests, flu-like symptoms and contacts. A management process of cases was introduced with a precautionary and anticipatory approach through the epidemiological analysis of local zones with the identification of areas at greatest risk, the analysis of possible, likely and confirmed cases on leave or sick leave and the identification of close contacts to be placed on leave. Measures were introduced to protect vulnerable personnel in the event of an infection, placing people with a certificate of disability in accordance with art. 3, paragraph 3 of Law 104/1992, with oncological pathologies or diseases involving immunosuppression or undergoing life-saving therapies and Group's people deemed to be fragile following an evaluation by a qualified physician under the Exceptional Health Surveillance regime, pregnant and breastfeeding women on leave (with the exception of flexible working from home). Psycho-social support interventions are available, with specialist psychological debriefing activities for working groups affected by COVID-19 cases, psychological support interventions for infected people and consultation and support initiatives for all personnel. Within the international scope, during the COVID-19 emergency and in 2021, the health and safety officers of the International Subsidiary Banks and of the Group's international structures were involved in the dissemination of the management protocols relating to the actions to be taken in accordance with the epidemiological development in the different contexts, as well as the dissemination of the Group standards and the specific local requirements of each country. Despite the variety of situations to be dealt with, the creation of the network of specialist representatives, in particular in the 11 subsidiaries of the International Subsidiary Banks Division, operating since 2019, and the use of collaboration areas for the timely sharing of updates and communications contributed to the management of the pandemic also at an international level.

Furthermore, the set of protocols adopted and the measures implemented in the different epidemiological scenarios were subjected to the evaluation of an independent third party.

Finally, with the collaboration of the company RBM Salute, a campaign was implemented to carry out rapid antigen tests with geographical coverage in 24 Group offices, from January to June 2021, which were accessed on a voluntary basis by the employees identified by the Safety and Protection Department and by Occupation Health Physicians upon the occurrence of certain scenarios and following triage activities. The antigen screening campaign involved 26,000 employees.

UNI ISO 45001:2018 CERTIFICATION FOR OHSMS

The certification attesting to the conformity of the Occupational Health and Safety Management System in compliance with the UNI ISO 45001:2018 standard was confirmed in 2021. The audit activities were based on a representative sample of branches and sites and involved the main head-office structures, branch employees, occupational health doctors, Worker Safety Representatives, and maintenance and cleaning company staff. The certification obtained covers all of the Intesa Sanpaolo branches and buildings in Italy. The certifying body also assessed the level of application of the infection risk management protocol implemented by Intesa Sanpaolo with respect to the requirements of the MyCare® model. The assessment rated it with the highest possible level of maturity, certifying that the infection risk prevention model adopted by the Bank is in line with national and international best practices, not only for the reference financial sector. A level of maturity equal to 5 confirms the significant commitment and contribution dedicated to the infection risk management issue by all the Bank's people, regardless of their organisational position.

INTEGRATION OF FORMER UBI BANCA EMPLOYEES

Following the incorporation of the former UBI Banca Group, steps were taken to conduct a survey into the Risk Factors relating to the workplace through inspections, and to update the scope of responsibility of Occupational Health Physicians, Radiation Protection Experts and Persons in charge of asbestos conservation. The training courses on occupational health and safety carried out at UBI were also evaluated and implemented, analysing any gaps in learning and preparing a consequent remedial plan, in compliance with anti-contagion provisions. From the point of view of the positions for the management of the emergency, the tasks present within UBI were incorporated and integrated: for the Coordinators of the emergency teams of the main management buildings, specific information meetings were organised to illustrate in detail tasks, responsibilities, supporting tools and personnel in the performance of the activities assigned to the role.