



Human rights protection

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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, it has defined its areas of responsibility for each of its stakeholders. Indeed, it has considered its impact on its Group's people, 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	199
Group's people	Combating the harassment of employees	page	188
Group's people	Freedom of association	page	178
Group's people	Non-discrimination, equal opportunities and fair remuneration	page	188
Group's people	Family life through work-life balance policies	page	195
Group's people	Safeguarding social security with supplementary pensions	page	195
Customers	Policies and solutions for combating robberies	page	112
Group's Customers/ People	Privacy of personal and sensitive data	page	100
Customers	Financial inclusion of the most vulnerable social groups	page	129
Suppliers	Inclusion of criteria for respecting human rights in the supply chain	page	239
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	63
Community	Culture and charitable activities promoting a respect for human rights	page	161
Environment	All	pages	207:221

With reference to financial year 2021, in 2022 the Group wrote and published the Modern Slavery Act Statement in response to the regulatory requirements of the "UK Modern Slavery Act" and the "Australian Modern Slavery Act". Available on the Group website [\[i\]](#), the Statement was prepared and approved by the Board of Directors of the Parent Company and the subsidiaries subject to the regulations. The document describes the measures adopted by the Group to combat the risk of slavery in its supply chain and activities with regard both to Group people and financial and lending products.

RELEVANCE OF ISSUES AND MAIN IMPACTS

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. Additionally, as in the case of the UK Modern Slavery Act and the Australian Modern Slavery Act, national regulations for the protection of human rights are also being issued and require businesses to provide greater transparency on the impacts of their value chains.

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	2021	2022
Accidents in the workplace	194	168
Group employees belonging to a union (% of total)*	66.2%	65.2%
Group part-time employees (% of total)	12.8%	12.4%
Reports of non-compliance with the Code of Ethics for alleged discrimination	11	11
Court cases for mobbing**	3	2
Cases of customer data being lost or stolen reported to the Data Protection Authority/Local Authority	8	18
Robberies - Number of events per 100 branches	0.07%	0.35%
Suppliers registered on Supplier Gate*** (no.)	10,058	9,770
Projects subject to Equator Principles screening ****:		
Number	19	18
Amount granted (millions of euro)	1,428	1,081
Donations to vulnerable and disadvantaged groups managed centrally (% of the total managed by the Charity Allowance)	99%	99%

* 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 77.5%.

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

*** All active 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 2022 the amount granted subject to Equator Principles screening stood at 5.3% of total project finance allocations.

COMPANY POLICIES

Through the Group policy, the 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 ESG & Sustainability 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 ESG and climate strategic objectives and the relative metrics and is subject to the certification of an independent auditor outside the Group.

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@intesasanpaolo.com), anonymously and without fear of reprisals.

Human rights issues were subject to third-party verification in accordance with the principles and content of the ISO 26000 standard as well as a new methodology compared with the previous year. The 2022 certification shows how the topic of human rights is subject to constant monitoring and supervision both within the Group (workers' rights) and externally, through the promotion of initiatives aimed at communities in which the Group operates; specific products and services (e.g. services designed to meet specific social needs or that promote the financial inclusion of vulnerable categories); the screening of major lending transactions also in terms of human rights; the assessment of suppliers and partners also from this perspective.

In particular, the analysis confirmed the Group's commitment to actions and measures designed to protect the health, safety and wellbeing of its employees and customers; in addition, with a view to fostering inclusion and closeness 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 2022.

With particular regard to the international subsidiary banks directly involved in this activity, the analysis also highlighted considerable attention to this topic in terms of support for the community and also for colleagues directly involved in the ongoing conflict between Russia and Ukraine through the promotion of solidarity initiatives.

The ISO 26000 compliant controls, procedures and activities identified during the analysis of Human Rights are outlined below:

Areas	Controls, procedures and activities
Due diligence	The Group has adopted a human rights policy that outlines its commitments to its main stakeholders (employees, customers, suppliers, communities); these principles are also referenced in other internal documents (e.g. Code of Ethics). Procedures are also in place to address negative impacts deriving from company decisions and activities or resulting from the activities of parties with whom the Group has relations, even in the absence of specific risk mapping with the related order of priority.
Risk situations for human rights	The Group is committed to guaranteeing respect for human rights in the event of exposure to one or more circumstances in which human rights could be at risk. It does this through the adoption and implementation of procedures for the management of specific situations (e.g. whistleblowing guidelines, regulations for combating sexual harassment) and the promotion of initiatives, activities and services which respond to specific social needs and promote the financial inclusion of the most vulnerable groups. In addition, in the area of risk clearing activities to assess major lending transactions, a screening is performed which also includes human rights aspects.
Avoiding complicity	The Group is committed to avoiding participating in, facilitating and taking advantage of violations of human rights and to preventing and addressing the risk of complicity, supplementing its human rights management procedures and processes with common regulatory and social aspects and striving to support the protection of human rights according to the principles of the main international conventions and guidelines. There is also an initial supplier and partner assessment procedure in place which uses ad-hoc metrics and includes an evaluation of human rights, part of the ESG Reputational Risk Clearing process.

Areas	Controls, procedures and activities
Dispute resolution	<p>There are mechanisms in place for reporting alleged human rights violations to the organisation. These tools have been adopted in accordance with current legislation and are accessible and notified to all stakeholders (employees, but also suppliers, customers and external parties), guaranteeing confidentiality and absence of reprisals for whistle-blowers.</p> <p>There are specific procedures and rules for the management of reports, also translated into English to ensure a shared and consistent Group approach with the International Subsidiary Banks, which are aware of the issue.</p>
Discrimination and vulnerable groups	<p>The Group is committed to preventing episodes of discrimination both internally (in recruitment and HR management processes) and in its external relations and transactions: the application of the Equator Principles also involves the assessment of social risks, such as the protection of workers' rights, the exclusion of child labour and forced labour within financed projects; in sensitive sectors sustainability issues are managed using a set of internal rules which include the "Guidelines for the Governance of ESG Risks concerning Lending Transactions". In addition, the Intesa supplier qualification process involves the evaluation of a series of preliminary documents that include the DURC (certification of social security contribution compliance) and documents pursuant to Italian legislative decree 81/08. However, there are no specific procedures in place for the analysis of episodes or potential cases of discrimination in which suppliers may have been involved.</p>
Civil and political rights	<p>Respect for and promotion of civil and political rights, with particular reference to freedom of association and freedom of opinion and expression, are also protected through constant dialogue with the Trade Unions.</p>
Economic, social and cultural rights	<p>The activities to promote an inclusive work environment continued. Published in 2021, the Rules for Combating Sexual Harassment support the Code of Ethics and the Code of Conduct in expressing the Group's firm condemnation of all types of harassment and also regulate the report management process in detail. Parenting support initiatives have been introduced. As well as by the industry outlook, ongoing relations with the Trade Unions are also regulated by the Labour/Management Relations Protocol, renewed in 2021, which has made it possible to implement a specific union relations model within the Group and also led to the creation of the Welfare, Safety and Sustainable Development Committee. People's physical security is safeguarded by the Corporate and Physical Security function and close attention is also focused on protecting the privacy and data security of customers.</p>
Core principles and workers' rights	<p>Freedom of association is guaranteed and the right to collective bargaining is recognised. 77% of employees in Italy and 30% of employees abroad are members of a trade union. Employment policies have been adopted that avoid all forms of discrimination in terms of gender, age, ethnicity, religion, nationality, political opinion, sexual orientation or disability (e.g. "Rules On Diversity For Sexual Orientation and Identity"). In Italy, the Health Surveillance and Psycho-Social Risks Office was set up to guarantee closer monitoring of occupational medicine activities (health surveillance, accident and occupational disease analysis, health emergency management) and psycho-social risks. Intesa Sanpaolo has also adopted a company welfare model that operates within an integrated system designed to ensure the best possible work-life balance for Group people and their families.</p>

Note: the controls, procedures and activities reported in the table were identified during the audit performed by a third party appointed by the Group, in compliance with the principles and content of the ISO 26000 standard.

* 2021 data available on the date of the audit performed by the third party appointed by the Group. See the previous table, "Indicators", for 2022 data.