



**RULES FOR COMBATTING SEXUAL  
HARASSMENT  
SUMMARY**

Effective: April 2021

## **INTRODUCTION**

This document states the Group's strong commitment to preventing and combatting any form of sexual harassment to ensure full respect for each person and the maximum protection of each person's dignity. This document is inspired by the Principles on Human Rights, the values expressed in the Code of Ethics, the Group's Internal Code of Conduct, and the Diversity & Inclusion Principles.

Intesa Sanpaolo does not tolerate any kind of harassment. As far as regards sexual harassment, Intesa Sanpaolo has tasked itself with combatting every situation that may fall within the behaviours described in this document, including cases where those engaging in the behaviour and/or the victims do not recognise the seriousness of the fact.

Sexual harassment, committed or attempted, constitutes a breach of this document as well as of the Principles on Human Rights, the Code of Ethics, the Group's Internal Code of Conduct, and the Diversity & Inclusion Principles. As a result, in cases where sexual harassment is identified, Intesa Sanpaolo adopts the following measures stipulated by legal and contractual regulations.

The purposes of this document are:

- to contribute to spreading a culture of maximum respect for the person, liberty, and individual dignity;
- to confirm and strengthen the commitment of the Bank to preventing sexual harassment, including through specific training initiatives;
- to create the conditions so that all cases of sexual harassment are reported, ensuring an effective process for managing reports that ensures maximum rigour and protection of the confidentiality of the people involved.

## **APPLICATION SCOPE**

Recipients of this documents include:

- all the staff employed by the Intesa Sanpaolo Group in performing their activities with internal and external partners;
- non-employee personnel (financial agents/consultants or collaborators) in performing their activities with internal and external partners;
- workers on staff leasing agreements
- recipients of apprentice/internship initiatives

- Group suppliers in any activity involving contact with the Group

This document also applies during social events, work trips, training and occasions that occur outside of the usual work places but that concern activities related to the professional context, as well as outside of this working context in cases where the sexual harasser and the victim both belong to the Recipient categories.

It should, in any case, be remembered that Intesa Sanpaolo will adopt the relevant initiatives, in line with what is set forth in the Group's Internal Code of Conduct, including where episodes of sexual harassment are verified as having been committed by the Recipients outside of the broad working context that constitutes this document' application field.

All the Group's Banks and Companies are obliged to adopt the provisions set forth in this document. Should the provisions of this document be more restrictive than what is set forth in local laws, Intesa Sanpaolo requires, in any case, compliance therewith irrespective of the fact that the behaviour engaged in is or is not forbidden by these laws.

## **SEXUAL HARASSMENT**

The expression "**sexual harassment**" identifies undesired conduct with sexual connotations, expressed in a physical, verbal or non-verbal manner, for the purpose or effect - in themselves or in their repetition - of violating the dignity of a worker and creating an intimidating, hostile, degrading, humiliating or offensive climate. <sup>1</sup>

Sexual harassment may consist in, by way of non-limiting example, the following behaviours that represent, therefore, a breach of this document:

- unwanted sexual offers, requests for sexual favours or other verbal or physical conduct of a sexual nature; sexual harassment that is carried out by abusing one's hierarchical position, promising advantages (e.g., career progression or economic benefits), or threatening disadvantages (e.g., missed promotion) are considered particularly serious
- adoption of offensive language containing sexual allusions;
- adoption of explicit sexual gestures;
- sending content that is sexual/pornographic (e.g., images, videos, or photographs);
- exposure to sexual/pornographic content (e.g., calendars, posters, images, magazines, or photographs) in work places and during work;

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<sup>1</sup> Definition art. 26, para. 2, Equal Opportunities Code (Legislative Decree No. 198 of 11 April 2006).

- adoption of behaviours aimed at obtaining unwanted physical contact;
- comments on the physical look of people with sexual references.

## **COMMITMENT OF INTESA SANPAOLO GROUP**

In order to ensure a working environment that is inspired by the principles of protecting the dignity and inviolability of the person, Intesa Sanpaolo undertakes to:

- implement all the actions necessary to prevent sexual harassment, encouraging the spread of a culture aimed at maximum respect of the person;
- adopt training initiatives, including mandatory ones, to promote knowledge and awareness on the issue of sexual harassment, on its seriousness, and the consequences thereof, so that this behaviour is not hidden and/or in any way minimised and in order to prevent hostile, degrading, humiliating, and offensive behaviour and language;
- adopt a structured management process for reporting sexual harassment;
- provide timely and impartial assistance and support to victims of sexual harassment, ensuring maximum confidentiality;
- disseminate the content of this document via communication initiatives, both in the launch phase and through additional, periodic actions for raising the awareness across the whole Group.

Everyone is called upon to contribute, in their daily response, to the Group's commitment.

Intesa Sanpaolo Managers, in particular, must be careful to intercept, in their own organisational units and in the performance of their functions, situations that fail to respect the provisions of this document. Every manager will need, in addition, to act with awareness of their role as Role Model, i.e. a figure who represents and interprets the company's distinctive management style in relation to all collaborators/colleagues and of the external community (customers, suppliers, and other stakeholders).

## **REPORT PROCESS**

In order to bring to light and manage each case of harassment, with the maximum rigour, a structured report management process is foreseen.

The whole report management process is carried out in the uttermost respect of the confidentiality of all the involved subjects, within a timeframe of at most 60 days from the reception of the initial reporting to the closing of the procedure (unless extended in case of particularly complex situations).

The analysis and report verification activities involve different offices of the Group in order to ensure maximum impartiality and rigour.

## **EXTERNAL PSYCHOLOGICAL ASSISTANCE AND LEGAL INFORMATION SERVICE**

The psychological assistance and legal information service (“Service”), offered by specially hired external professionals, is available to all Recipients.

The Service has the aim of providing victims of sexual harassment with psychological and legal assistance that ensure anonymity and total impartiality.

The service is offered by a team of professionals (psychologists/psychotherapists) specialised in remote psychological support. If requested, it is also possible to contact the team of lawyers to request a legal overview of the events.

As proof of the maximum care afforded to the wellbeing of its own employees, Intesa Sanpaolo offers the psychological assistance and legal information service, including in cases where the harassment occurred outside of the work environment (for example, in the private sphere).