



# 2024 Modern Slavery Statement

INTESA  SANPAOLO

 INTESA SANPAOLO  
WEALTH MANAGEMENT  
Luxembourg

 INTESA SANPAOLO  
PROTEZIONE

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# 1. Introduction

In the 2022-2025 Business Plan (the “Business Plan”) of the Intesa Sanpaolo Group (hereinafter, also the “Group”), ESG themes represent one of the four pillars for solid and sustainable value creation and further strengthen Intesa Sanpaolo’s leadership in sustainability. In its Business Plan, Intesa Sanpaolo states that people have always represented and continue to represent the most important asset for the Group and the enabler for its future success. Intesa Sanpaolo S.p.A. (hereinafter, “Intesa Sanpaolo”) is the only Italian bank included in the Dow Jones Best-in-Class World and Europe Indices, ranks first among peer group by Sustainalytics obtaining, for the second year in a row, ESG Top-Rated Industry and ESG Top Rated Regional badges which include the companies with the best ESG Risk Ratings from Sustainalytics. Intesa Sanpaolo is ranked as the top European bank and the second in the world in the Corporate Knights 2025 “Global 100 Most Sustainable Corporations in the World” index and the number-one bank worldwide and the only Italian bank in the FTSE Diversity and Inclusion Index 2024 – Top 100. In addition, it was recognised as the Top Employer Europe and confirmed Top Employer Italy 2025 for the fourth year in a row by the Top Employers Institute and ranked first in the 2024 LinkedIn Top Companies, as the best company in Italy for career development and professional growth. In 2024 Intesa Sanpaolo was ranked first in Europe for ESG program in the Extel<sup>1</sup> ranking. Intesa Sanpaolo participates in the UN Global Compact initiative and is an active member of the community of businesses that support the UN Sustainable Development Goals, set by the UN 2030 Agenda and signed by 193 countries, including Italy, at the end of 2015.

Intesa Sanpaolo’s Principles on Human Rights [1] set out the commitment of the Group to human rights. As set out in the Principles, Intesa Sanpaolo recognises that it has a responsibility to respect human rights. To this end, Intesa Sanpaolo is committed to identifying, mitigating and, where possible preventing, potential or actual adverse human rights impacts which it may cause or contribute to, or directly linked to its own activities, in accordance with the UN Guiding Principles on Business and Human Rights (UNGPs).

## 2. Reporting entities

This is the modern slavery statement of Intesa Sanpaolo Group and Intesa Sanpaolo is the ultimate parent company of the Group. This modern slavery statement describes our efforts to combat modern slavery and human trafficking during the reporting period 1 January 2024 to 31 December 2024 (Financial Year 2024) and is prepared in accordance with the requirements of section 54 of the UK’s Modern Slavery Act 2015 (UK) (hereinafter, the “**UK Modern Slavery Act**”), and section 13 of the Australian Modern Slavery Act 2018 (Cth) (hereinafter, the “**Australian Modern Slavery Act**”).

This statement applies to the following companies within the Group that are required to produce a statement under the UK Modern Slavery Act or the Australian Modern Slavery Act (hereinafter, the “reporting entities”):

- (a) Intesa Sanpaolo<sup>2</sup> which has branches located in the UK (UK establishment number BR000036) and in Australia (Australian Business Number 46 156 153 829). Intesa Sanpaolo is the only entity covered by this statement that is a reporting entity under the Australian Modern Slavery Act. It is a reporting entity because it operates a branch in Sydney which carries on business in Australia. As indicated above, Intesa Sanpaolo is also required to report under the UK Modern Slavery Act;
- (b) the following subsidiary companies owned and/or controlled by Intesa Sanpaolo are required to file a statement under the UK Modern Slavery Act<sup>3</sup>:
  - (i) Intesa Sanpaolo Wealth Management S.A.<sup>4</sup>

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<sup>1</sup> Formerly Institutional Investor.

<sup>2</sup> Intesa Sanpaolo S.p.A. Registered Office: Piazza S. Carlo, 156 10121 Torino Italy Secondary Registered Office: Via Monte di Pietà, 8 20121 Milano Italy Share Capital Euro 10,368,870,930.08 Torino Company Register and Fiscal Code No. 00799960158 “Intesa Sanpaolo” VAT Group representative Vat Code No. 11991500015 (IT11991500015) included in the National Register of Banks No. 5361 ABI Code 3069.2 Member of the National Interbank Deposit Guarantee Fund and of the National Guarantee Fund and Parent Company of the banking group “Intesa Sanpaolo” included in the National Register of Banking Groups. Intesa Sanpaolo S.p.A. (London branch) is authorised for specific activities and product types. Details are available on the Financial Conduct Authority’s website.

<sup>3</sup> During 2023, Fideuram Asset Management (Ireland) DAC, Intesa Sanpaolo Bank Luxembourg S.A., Intesa Sanpaolo Bank Ireland Plc and Banka Intesa Sanpaolo d.d. were no longer authorized to operate in the UK and are therefore not reporting entities under the UK Modern Slavery Act for the purposes of this year’s statement.

<sup>4</sup> Intesa Sanpaolo Wealth Management (S.A.), a subsidiary of Fideuram – Intesa Sanpaolo Private Banking S.p.A. (Intesa Sanpaolo Group). Address: 28 bd de Kockelscheuer, L-1821 Luxembourg. Share Capital Euro 123,813,000 – Registered in Luxembourg, Registre de commerce et des sociétés number B117963 – VAT n. LU21282223. Intesa Sanpaolo Wealth Management has cancelled its temporary permission and moved into the supervised run-off regime under the UK’s Financial Services Contracts Regime (FSCR) (the nature and extent of consumer protections may differ from those for firms based in the UK. Details of the FSCR, which allows EEA-based firms to operate in the UK for a limited period to carry on activities which are necessary for the performance of pre-existing contracts, are available on the Financial Conduct Authority’s website).

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(ii) Intesa Sanpaolo Protezione S.p.A.<sup>5</sup>

Unless otherwise specified when we use the terms “we”, “us” and “our”, we mean Intesa Sanpaolo and the other reporting entities identified above, which are required to report under the UK Modern Slavery Act and the Australian Modern Slavery Act.

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<sup>5</sup> Intesa Sanpaolo Protezione S.p.A. (until 30 November 2024 named “Intesa Sanpaolo Assicura S.p.A.”) Registered Office: Via San Francesco d’Assisi, 10 10122 Turin – Italy. Share Capital Euro 27,912,258 Company Register and Fiscal Code No. 06995220016. “Intesa Sanpaolo” VAT Group representative Vat Code No. 11991500015 (IT11991500015). Intesa Sanpaolo Protezione S.p.A. currently has a contractual run off authorization to operate in the UK.

## 3. Our structure, operations and supply chain

### 3.1 Structure and operations

Intesa Sanpaolo is Italy's largest bank, with approximately 13.9 million customers and 3,000 branches in Italy. Intesa Sanpaolo also has an international presence, with over 900 branches and 7.5 million customers, including subsidiary banks operating in commercial banking in 12 countries in Central/ Eastern Europe and in the Middle East and North Africa areas.

*The Intesa Sanpaolo Group: presence in Italy as of 31 December 2024*

Banks

INTESA  SANPAOLO

 FIDEURAM  
INTESA SANPAOLO  
PRIVATE BANKING

 isybank



#### NORTH WEST

Branches

944

#### NORTH EAST

Branches

616

#### CENTRE

Branches

639

#### SOUTH

Branches

567

#### ISLANDS

Branches

205

*Figures as at 31 December 2024*

#### Product Companies<sup>6</sup>

 FIDEURAM  
VITA

 INTESA SANPAOLO  
ASSICURAZIONI

 INTESA SANPAOLO  
INSURANCE AGENCY

 INTESA SANPAOLO  
PROTEZIONE

 Salute  
SERVIZI

*Bancassurance and Pension Funds*

 PRESTITALIA

*Consumer Credit<sup>7</sup>*

 EURIZON  
ASSET MANAGEMENT

*Asset Management*

 SIREF  
FIDUCIARIA

*Fiduciary Services*

<sup>6</sup> Factoring and Leasing activities are carried out directly by Intesa Sanpaolo S.p.A., the Parent Company.

<sup>7</sup> Consumer Credit activities are also carried out directly by Intesa Sanpaolo S.p.A., the Parent Company.

## The Intesa Sanpaolo Group: international presence as of 31 December 2024

### Banks, Branches and Representative Offices

# INTESA SANPAOLO

 **ALEXBANK** | بنك الإسكندرية

 **BANCA INTESA**

 **BANCA INTESA**  
Beograd

 **CIB BANK**

 **EXIMBANK**

 **FIRSTBANK**

 **INTESA SANPAOLO BANK**  
Albania

 **INTESA SANPAOLO BANK LUXEMBOURG**

 **INTESA SANPAOLO BANK**  
Romania

 **INTESA SANPAOLO BANK**  
Slovenia

 **INTESA SANPAOLO BANKA**  
Bosna i Hercegovina

 **INTESA SANPAOLO BANK IRELAND**

 **INTESA SANPAOLO BRASIL SA**

 **INTESA SANPAOLO WEALTH MANAGEMENT**  
Luxembourg

 **PRAVEX BANK**

 **PRIVREDNA BANKA ZAGREB**

 **REYL INTESA SANPAOLO**

 **VUB BANKA**

#### AMERICA

Direct Branches	Representative Offices
New York	Washington D.C.

Country	Subsidiaries	Branches
Brazil	Intesa Sanpaolo Brasil	1

#### AUSTRALIA/OCEANIA

Direct Branches
Sydney

#### ASIA

Direct Branches	Representative Offices
Abu Dhabi	Beijing
Doha	Beirut
Dubai	Ho Chi Minh City
Hong Kong	Jakarta
Shanghai	Mumbai
Singapore	Seoul
Tokyo	

#### EUROPE

Direct Branches	Representative Offices
Amsterdam	Brussels*
Frankfurt	
Istanbul	
London	
Madrid	
Paris	
Warsaw	



Country	Subsidiaries	Branches
Albania	Intesa Sanpaolo Bank Albania	35
Belgium	Intesa Sanpaolo Wealth Management	2
Bosnia and Herzegovina	Intesa Sanpaolo Banka Bosna i Hercegovina	43
Croatia	Privredna Banka Zagreb	138
Czech Republic	VUB Banka	1
Hungary	CIB Bank	59
Ireland	Intesa Sanpaolo Bank Ireland	1
Luxembourg	Intesa Sanpaolo Wealth Management Intesa Sanpaolo Bank Luxembourg	1 1
Moldova	Eximbank	17
Romania	Intesa Sanpaolo Bank Romania First Bank	34 40
Russian Federation	Banca Intesa	22
Serbia	Banca Intesa Beograd	134
Slovakia	VUB Banka	153
Slovenia	Intesa Sanpaolo Bank	40
Switzerland	Reyl Intesa Sanpaolo	3
Ukraine	Pravex Bank	39

#### AFRICA

Representative Offices	Country	Subsidiaries	Branches
Cairo	Egypt	Bank of Alexandria	174

Figures as at 31 December 2024

\* European Regulatory & Public Affairs

### Product Companies

 **EURIZON**  
ASSET MANAGEMENT

 **FIDEURAM**  
ASSET MANAGEMENT IRELAND

 **INTESA INVEST**  
Beograd

 **INTESA SANPAOLO ASSICURAZIONI**

 **意才**  
YI TSAI

#### Wealth Management

 **CIB LEASING**

 **INTESA LEASING**  
Beograd

 **PBZ LEASING**

 **VUB OPERATING LEASING**

#### Leasing

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Further information about our international presence can be found here [\[i\]](#).

The Group's operations are organised into six divisions:

(1) **Banca dei Territori division**, focusing on individuals, small and medium-sized enterprises and non-profit entities. The division includes our activities in industrial credit, leasing and factoring, as well as instant banking.

(2) **IMI Corporate & Investment Banking division**, which supports corporates, financial institutions and public administration. Its main activities include capital markets & investment banking. The division is present in 24 countries where it facilitates the cross-border activities of its customers through a specialist network made up of branches, representative offices, and subsidiary banks focused on corporate banking.

(3) **International Banks division**, which includes the following commercial banking subsidiaries: Intesa Sanpaolo Bank Albania in Albania, Intesa Sanpaolo Banka Bosna i Hercegovina in Bosnia and Herzegovina, Privredna Banka Zagreb in Croatia, Bank of Alexandria in Egypt, Eximbank in Moldova, CIB Bank in Hungary, Intesa Sanpaolo Bank Romania and First Bank in Romania, Banca Intesa Beograd in Serbia, VÚB Banka in Slovakia and in Czech Republic, Pravex Bank in Ukraine and Intesa Sanpaolo Bank in Slovenia (Banka Intesa Sanpaolo d.d.).

The divisions of the Wealth Management structure:

(4) **Private Banking division**, which serves private clients and high net worth individuals. Intesa Sanpaolo Wealth Management S.A. is part of this division.

(5) **Asset Management division**, targeted at the Group's customers, commercial networks outside the Group, and the institutional customers. The division includes, among others, Eurizon Capital SGR S.p.A., with 333 billion euro<sup>8</sup> of assets under management on 31 December 2024.

(6) **Insurance division**, which holds financial and insurance-policy liabilities amounting to 177 billion euro as of December 2024 and includes Intesa Sanpaolo Assicurazioni<sup>9</sup> - which controls Intesa Sanpaolo Protezione<sup>10</sup>, Intesa Sanpaolo Insurance Agency, InSalute Servizi - and Fideuram Vita.

Intesa Sanpaolo's branch in the UK, located in London, is part of the IMI Corporate & Investment Banking division. The branch offers a wide range of products and services.

The Group also has a number of subsidiary companies which carry on business in the UK: those subject to this Statement are listed in Section 2 (b) (see pages 4 and 5) and they undertake financial, banking and insurance activities.

Intesa Sanpaolo's branch in Australia, located in Sydney, is part of the IMI Corporate & Investment Banking division. The branch is active in commercial lending and wholesale banking – focused on infrastructure, structured finance, corporate finance, syndicated finance and bilaterals and an emphasis on green economy related projects, including renewable energy and energy transition.

Further information about our organisational structure at 31 December 2024 can be found here [\[i\]](#).

For Financial Year 2024, the Group directly employed 93,539 employees.

The UK branch of Intesa Sanpaolo had a total workforce of 259 employees, including 11 casual workers and 6 part-time employees. As of 31 December 2024, Intesa Sanpaolo's branch in Australia employed 24 people and they are all full time.

As of 31 December 2024, the other reporting entities did not have workers in the UK (or Australia).

More information regarding the nature of our operations and a breakdown of our workforce (for Financial Year 2024) can be found in our 2024 Consolidated Sustainability Statement [\[i\]](#).

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<sup>8</sup> Net of duplications.

<sup>9</sup> On 1st December 2024, Intesa Sanpaolo Vita has changed company name in Intesa Sanpaolo Assicurazioni S.p.A.

<sup>10</sup> On 1st December 2024, Intesa Sanpaolo Protezione S.p.A. born from the merger of Intesa Sanpaolo Assicura with Intesa Sanpaolo RBM Salute S.p.A.



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## 3.2 Nature of our supply chain

The Group procurement model is structured in two models: (i) in the “centralised purchasing” model the Procurement Head Office structure directly carries out the purchasing activities for the Group entities or assists them, and (ii) in the “independent purchasing” model, for the commodity categories that are not covered by the centralised procurement model, the Group entities carry out independently the purchasing activities, according to their own processes. The principles and rules defined in the Group Purchasing Guidelines and in the Purchasing Rules described below apply to both models. Top categories of centralised procurement spend include:

- (a) Information and communication technology. Products and services within this procurement category include: all computer hardware, hardware maintenance, and system licenses.
- (b) Real estate. Products and services include: rental expenses, furniture and furnishings, building maintenance and cleaning contracts.
- (c) Advertising and other public relations expenses. Products and services include: multimedia and other internal communication services, entertainment events and sponsorship of sport, religious or non-profit organisations.
- (d) Physical Security. Products and services include: installation of security systems, purchase of safes, alarm units and purchase of certain surveillance equipment, security and guard services.
- (e) Office Equipment. Products and services include: purchase of office equipment and machines, IT consumables, stationery and office supplies, and purchase of audio-visual equipment.
- (f) Insurance. Products and services include: employee benefits insurance, property insurance and general liability insurance.

For Financial Year 2024 there were 11,499 suppliers registered on the “Supplier Gate” platform<sup>11</sup>. 6,045 of these suppliers were based in Italy and 5,075 were based in other parts of Europe. 379 were from other countries around the world. Approximately 97% of the total order value relates to suppliers based in Europe.

The main categories of expenditure under the “independent purchasing” model concern legal advice, taxes, other advertising expenses and sponsorships.

## 4. The risks of modern slavery practices in our operations and supply chain

### 4.1 Operations

- (a) Our workforce

Based on the geographical location of our operations, the nature of our operations and the nature of our workforce, we consider there is a low risk of modern slavery in our operations.

The Group operates in the financial services industry and the majority of the Group’s workforce is based in Italy, which is considered a jurisdiction with a relatively low risk for modern slavery practices<sup>12</sup>. The same can be said for the workforce based in the UK and Australia<sup>13</sup>.

Our employees are subject to background checks before commencing employment, and we take steps to ensure that we comply with applicable local labour laws and workplace health and safety laws.

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<sup>11</sup> The figures refer also to suppliers whose registration with the Intesa Sanpaolo Group’s Supplier Gate is ongoing. Detailed information on Supplier Gate can be found in Section 5.2 (page 17).

<sup>12</sup> <https://www.globalslaveryindex.org/>

<sup>13</sup> <https://www.globalslaveryindex.org/>

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Our employees also have written contracts of employment. We occasionally use recruitment agencies to fill vacancies in our workforce, but when we do so we only use reputable agencies, and we pay all costs associated with the recruitment process. Employees never have to pay a fee to get a job at Intesa Sanpaolo.

Foreign nationals are employed on the basis that the particular employee has the required work permit (and visa status) to work in that particular jurisdiction. They are employed in accordance with the relevant jurisdiction's work immigration criteria.

(b) Financial products and lending

As financial institutions, we acknowledge that there is an inherent modern slavery risk associated with our investment, financing and lending services. Our connection to these risks is remote and we are not directly involved in the operations of our customers, but we acknowledge that we could lend or provide finance to customers in inherently high-risk sectors that have modern slavery risks in their operations and/or supply chain. Certain sectors and industries may have higher modern slavery risks because of their characteristics, products and processes. For example, where we finance mining, manufacturing and construction projects, we may contribute to or be directly linked to modern slavery risks. We may also be directly linked to modern slavery risks through our business relationships with business partners and investees. As part of our general oversight of social risks, we have (i) issued specific Group Guidelines for the Governance of Environmental, Social and Governance (ESG) Risks (see page 15), (ii) introduced an ESG score which aims to evaluate the ESG profile of corporate customers (using data from external and internal sources and concerning the most important risk and opportunity indicators in the three ESG dimensions which include, for example, about the social dimension, labour management and standards, occupational health and safety and human capital development), and (iii) constituted a dedicated process for the ESG & reputational risk assessment and issued the related rules "Rules on ESG & Reputational Risk Clearing" (see page 16).

The ESG Score is a qualitative-quantitative assessment that analyses information on the Environmental, Social and Governance profile of a client company and takes into consideration both the risks to which it is exposed and the opportunities that can develop in these areas. Since 2022, the ESG Score has fed into some of the main risk and governance processes within the Group's Credit Framework. A poor ESG score could cause a notch-down of the CRA (Credit Risk Appetite) evaluation class, it could reduce the discount or increase the add-on to Fund Transfer Price within the Credit Strategies Framework, which is part of Group's Credit Framework and it could require a second level ESG reputational risk clearing<sup>14</sup> in the Credit Granting process, for example in the case of low level of ESG Score both overall and assessed on individual E, S and G Pillars, in combination with other ESG metrics.

The ESG Score analysis is carried out across more than 100 parameters (for larger companies), including both data relating to Environmental, Social and Governance issues and indicators of possible controversies. The data used to build the ESG Score comes both from internal sources, deriving from our knowledge of our customers, and from external sources through a panel of leading data providers.

At the end of 2022, the calculation of the ESG Score for non-financial corporate clients of Banca dei Territori Division and IMI Corporate & Investment Banking Division was integrated into our IT systems with a fully digitalized process and at the end of December 2024 it covers over 245,000 counterparties with approx. €154bn in loans. Starting from 2023, the proprietary ESG scoring model was further enhanced to assess new portfolio segments and counterparty types and to improve the databases that feed into the scoring model. In this regard, the scoring model has been updated to capture the specificities of Project Finance operations, to include Sovereign entities, as well as part of the Financial Institutions (Banks) counterparties and to assess corporate clients of the Group's banking subsidiaries within the perimeter of the International Banks Division that operate in the European Union.

The ESG Score is quarterly updated for counterparties included in the portfolios above mentioned and it is calculated any time a new Project Finance operation is proposed by the business relationship. Parameters used in the model are periodically reviewed considering the evolution of the information available following regulatory developments and voluntary disclosures.

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<sup>14</sup> For more information on ESG & Reputational Clearing process please refer to section 5.1 Policies on page 16.

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## 4.2 Supply chain

We consider the risk of modern slavery within our supply chain to be low, following our assessment of our suppliers.

In general terms, all the suppliers sourced through the centralised purchasing model are assessed, apart from a few exceptions (e.g. Infoproviders classified as stock exchanges or reference companies for global financial information and major data providers, banking institutions, insurance companies registered in public registers, Public Administration bodies) or occasional suppliers in not high-risk categories for assignments up to 25k euro.

The assessment of registered suppliers takes into account not only the economic-financial and technical-organisational characteristics of each supplier, but also the aspects pertaining to business ethics, respect for human rights, workers' rights and the environment. This is based on statements made through specific questionnaires and/or the possession of certain certifications. In particular, a specific ESG questionnaire is mandatory for all new suppliers. A campaign was also launched for all previous suppliers used on a recurring basis to obtain a global assessment by 2025. At the end of 2024, 86% of qualified suppliers engaged within the centralized purchasing model completed the questionnaire and obtained an ESG evaluation.

The evaluated suppliers are also subject to monitoring. Any negative events or findings, including non-payment of social security and welfare contributions, violations of the payment of wages or taxes, convictions, etc. could lead to action such as the termination of contracts and blacklisting. In this regard, a total of about 2,400 alerts were processed in 2024. Of these, only about 240 were assessed as high-risk (with downgrading of the Global Score of the qualification assessment), but only 30 suppliers resulted in blacklisting (of which 9 related to judicial proceedings, internal and external prejudicial proceedings), and none related to violation of workers' human rights.

In relation to the possession of documents certifying that the suppliers have fulfilled their obligations to pay social contributions for their employees, in 2024 Group Procurement carried out approximately 23,800 compliance checks on the documents uploaded to Supplier Gate, of which 9,550 related to the certification of social security and welfare contributions, 2,800 annual financial report, and around 11,450 other documents (e.g. technical-professional suitability, certificates of registration with public company registers). In 2024 approximately 1,780 compliance audits were also initiated on ESG certifications uploaded to Supplier Gate including for example: ISO 45001 "Occupational health and safety management systems - Requirements and guidance for use", ISO 37001 "Management systems for the prevention of corruption", ISO 20400 "Sustainable procurement". These checks are carried out both on the direct supplier and on any sub-suppliers stated in the procurement contracts.

Despite our overall assessment of our suppliers set out at the beginning of this section and having regard to our top categories of procurement spend, we have identified two categories of suppliers which are potentially at a higher risk of modern slavery.

These are suppliers within the "Information and Communication Technology (ICT)" industry category and suppliers within the "real estate" industry category (e.g. cleaning services, systems and facilities, building maintenance). For the ICT category the greater risk is dictated by the complexity of the supply chain that does not always allow full visibility of the entire chain. For the "real estate" category and surveillance the most critical factor relates to the workforce. Our processes for these suppliers are broadly the same as for others, but account is taken of the specific risks posed by these sectors and reflected in our assessment process.

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## 5. Assessing and addressing modern slavery risks

Intesa Sanpaolo recognises that it has a responsibility to respect human rights and is committed to identifying, mitigating and where possible preventing potential adverse human rights impacts connected to its own activities, as guided by the UNGPs.

Intesa Sanpaolo's approach to identifying and addressing modern slavery risk, and human rights risks more broadly, is global and Intesa Sanpaolo aims to consistently apply this approach across the Group (including to the reporting entities covered by this modern slavery statement).

Intesa Sanpaolo aims to act, and ensure the Group acts, consistently with the ten principles of the UN Global Compact, which are as follows:

### Human Rights

- Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights; and
- Principle 2: make sure that they are not complicit in human rights abuses.

### Labour

- Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;
- Principle 4: the elimination of all forms of forced and compulsory labour;
- Principle 5: the effective abolition of child labour; and
- Principle 6: the elimination of discrimination in respect of employment and occupation.

### Environment

- Principle 7: Businesses should support a precautionary approach to environmental challenges;
- Principle 8: undertake initiatives to promote greater environmental responsibility; and
- Principle 9: encourage the development and diffusion of environmentally friendly technologies.

### Anti-Corruption

- Principle 10: Businesses should work against corruption in all its forms, including extortion and bribery.

In particular, Intesa Sanpaolo reports annually on strategies, policies, activities implemented and results achieved in order to contribute to the United Nations Sustainable Development Goals (SDGs) and the principles of the Global Compact through the Communication on Progress – COP.

Intesa Sanpaolo also aims to respect, and ensure the Group respects, the fundamental rights established by the eight conventions of the International Labour Organisation (ILO) as stated in the ILO Declaration on Fundamental Principles and Rights at Work, in particular the right of association and collective bargaining, the prohibition of forced and child labour and non-discrimination in the workplace.

Intesa Sanpaolo's approach to human rights and sustainability is overseen by the Board of Directors with the support of the Risks and Sustainability Committee. There is also a Steering Committee - Business Plan and Sustainability (ESG) Session - and ESG Control Room which contribute to and collaborate on ESG issues and the management of ESG risk across the Group. Intesa Sanpaolo's internal policies and procedures to address the risks of modern slavery in our operations and supply chain are detailed below. These policies and procedures aim to apply across the Group worldwide, including the reporting entities covered by this modern slavery statement.

### 5.1 Policies

The policy framework outlined below defines areas of responsibility towards each stakeholder (i.e. employees, customers, suppliers) and provides a framework for assessing and addressing the risk of modern slavery in Intesa Sanpaolo's operations and supply chain. These policies are made available to all Group's employees (via the company intranet), who also receive regular training about their content.

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A collection of online mandatory training modules on Modern Slavery was made available in Italian and English language to all Group's employees. The number of hours undertaken on these training modules in 2024 reached a total of approximately 58,400. The training modules were also translated in local languages in order to be spread in 2025 for the International Banks Division. Furthermore, during 2024 a dedicated training event was also organised for the Chiefs and Executive Directors, focused on Code of Ethics and modern slavery issues.

A dedicated structure evaluates, together with the human resources structures, all the elements necessary for a detailed examination of the training needs collected, to define the feasibility of the training initiative and the possible transversal aggregations, giving particular priority to the implementation of mandatory initiatives.

The training activities, in particular the mandatory ones, also to respond to requests coming from the Supervisory Authorities and the internal Control Functions, are continuously monitored for the respective purposes by the Control Functions, the Chief People & Culture Officer Governance Area and the competent HR functions.

### Group Code of Ethics

The Group Code of Ethics [1] is a voluntary, self-regulating tool adopted by all Group companies that is an integral part of the Group's risk management strategy. The Code of Ethics extends to topics relevant to modern slavery such as the principle of "Equality and Inclusion". It also includes a reference to the corporate mission, which is based on values such as "Respect for specific qualities" and "Values of the individuals" and highlighting the central role played by Intesa Sanpaolo's people, who are vital resources and the driving force behind the Bank's success. In addition, the Code includes the updating of the Group's commitments on sustainability topics at an international level. The Code describes the values in which the Group believes and to which it is committed, outlining the principles of conduct which derive from the context of the relationship with each stakeholder and, consequently, raising the standards that each person within the Group must maintain in order to merit the trust of all stakeholders. The Code contains the principles that regulate our relationships with stakeholders. In certain particularly relevant areas (for example, human rights, employment protection, environmental protection, the fight against corruption) the Code refers to rules and principles that are consistent with international standards. The Code outlines our commitment to, amongst other things, the principles established by the fundamental conventions of the ILO and in particular the right of association and collective bargaining, the prohibition of forced and child labour and non-discrimination in hiring practices. The Code includes the option to submit reports of alleged non-compliance with the provisions laid down therein, by providing a specific e-mail address.

### Group Internal Code of Conduct

The principles and rules set out in the Group Internal Code of Conduct apply to Intesa Sanpaolo and to each company of the Intesa Sanpaolo Group (see Section 3). To this end, the subsidiary companies are required to implement the Code of Conduct by resolution of the competent Corporate Bodies and, in this context, they may always introduce additions and modifications to the Code of Conduct, with stricter or different rules according to their specificities. Any such amendments to the Code of Conduct should be submitted in advance to Intesa Sanpaolo for assessment. With regard to Intesa Sanpaolo branches and offices located in foreign countries, the Code of Conduct may, without prejudice to its principles, be subject to adaptations linked to local legislative requirements.

The Code of Conduct applies in all Group companies to management board members and key function holders, members of the management and control bodies, employees, non-employee financial advisors, agents and external collaborators (such as consultants and suppliers). The provisions also apply to workers under supply contracts and participants of internship/traineeship initiatives, insofar as they are compatible with the activities carried out and the rules governing the relevant relationships.

The Group Internal Code of Conduct (updated in 2024, without changes to the section on "person's dignity and personality of the individual" approved in 2020) prohibits any activity aimed at undermining human dignity and requires all recipients of the Code to maintain the utmost respect for the dignity and personality of every individual.

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## Principles on Human Rights

Adopting a human rights commitment is key to managing modern slavery risk. Our commitment to human rights is described in the Principles on Human Rights. This is brought to employees' attention through digital contents informed by their respective areas of operation, roles and responsibilities. There is a section of these Principles which applies directly to suppliers. The following principles from the Principles on Human Rights derive from the established principles of the Group Code of Ethics:

- non-discrimination based on gender, age, ethnic origin, religion, political persuasion and union association, sexual orientation and gender identity, language or disability;
- right to health and safety and avoiding commercial relationships with suppliers involved in violations of workplace health and safety standards;
- countering the forms of child labour and forced labour.

We seek to avoid commercial relationships with suppliers involved in violations of these principles.

## Diversity, Equity and Inclusion Principles

The Principles confirm and make more effective the Group's commitment to implement and disseminate – inside and outside of the Group – a policy for the respect of each dimensions in which the natural differences between individuals can be expressed, considering an intersectional approach (gender, gender identity and/or gender expression, sexual orientation, marital status and family status, age, ethnicity, religious belief, political affiliation and affiliation to unions, nationality, language, cultural background, physical and psychological conditions, physical appearance or any other feature of each individual, also including the expression of one's own thought). Furthermore, the policy sets out:

- (i) the Group's non-tolerance of any discrimination;
- (ii) the Group's commitment to training and raising awareness on Diversity, Equity & Inclusion (DE&I) issues;
- (iii) the focus on "Inclusion" commitment;
- (iv) the expectation of behaviour from manager and from each employee;
- (v) greater attention to the use of increasingly inclusive and respectful language.

The DE&I Principles were updated in 2024 and the new version was approved by the Board of Directors. The main changes to the document concern the inclusion, in the Principles, of reporting activities on the gender pay gap to the Board of Directors and the analysis of the distribution by gender of the merit interventions<sup>15</sup>.

## Rules for combatting sexual harassment

The Rules for combatting sexual harassment state 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. In 2023, the Rules were updated to introduce a dedicated email inbox for reports of sexual harassment. This email inbox now exists alongside the pre-existing inbox dedicated to gathering different reports and is accessible to victims and/or witnesses.

## Group Anti-Corruption Guidelines

Our Group Anti-Corruption Guidelines identify principles, sensitive areas and define roles, responsibilities and macro-processes for the Group's management of corruption risk, further strengthening the internal regulatory framework already characterized by the presence of the Group Code of Ethics, the Group Internal Code of Conduct and - for the Group's Italian companies – the Model 231/2001 adopted under Italian Legislative Decree 231/2001. The Anti-Corruption Guidelines apply to management board members and key function holders, members of the management and control bodies and to all Group personnel as well as to external parties who cooperate with the Group in carrying out its activities. In 2024, the Board of Directors of Intesa Sanpaolo approved the updated Group Anti-Corruption Guidelines. The updated Anti-Corruption Guidelines concern some fine-tuning interventions, for example the elimination of the anti-corruption reference role for Group companies under centralized management. However, supervision is maintained by the subsidiary anti-money laundering managers, who also carry out this role in the anti-corruption field.

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<sup>15</sup> As established in the DE&I Principles, Intesa Sanpaolo pursues a gender-neutral remuneration and incentive policy, as well as neutral with regard to any other form of diversity, based on equal pay for workers for equal work or work of equal value.

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The anti-corruption due diligence procedures set out in the Group Anti-Corruption Guidelines allow the detection of any prejudicial information or criminal proceedings against the counterparties, which may also include information relating to modern slavery.

### Group Purchasing Guidelines

Our Group Purchasing Guidelines are issued by the Board of Directors of Intesa Sanpaolo and set out the roles and responsibilities of entities in our Group in relation to Group purchasing, as well as the principles and macro-processes to observe during all stages of managing the purchasing of goods and services. The document also defines the levels of centralisation or autonomy, in compliance with other internal regulations. Our Group Purchasing Guidelines address, during the whole purchasing process, to respect human rights, proper employment conditions and business ethics, through measures and resources that minimise negative impacts and promote an awareness of risks and social and environmental opportunities. In addition, the Group Purchasing Guidelines address, during the whole purchasing process, compliance with regulations on health and safety in the workplace, including in relation to the risks that service providers and suppliers are exposed to when operating on premises made available by a Group company.

### Purchasing Rules

The Purchasing Rules are issued by the Chief Cost Management Officer Government Area and implement the guidelines outlined above in the different phases of the sourcing process, according to transparency and tracking criteria:

- forwarding and analysis of the requirement request;
- choice of purchasing strategy;
- selection and negotiation with suppliers;
- contractualization with the identified supplier.

The Purchasing Rules focus on, among other things, the operational risk management, in relation to third-parties, of the general Group Guidelines on Reputational Risk and the Governance of Environmental, Social and Governance (ESG) Risks.

The Purchasing Rules also define that, for independent spending categories, the Purchasing Entities are responsible for defining purchasing processes, within their own structure, which are consistent with the principles written in the Group Purchasing Guidelines and in the Purchasing Rules.

### Group Guidelines for the Governance of Environmental, Social and Governance (ESG) Risks

To advance the sustainability of our operating model over the long-term, we attribute particular emphasis to monitoring and controlling non-financial risks, model risk, reputational risks and ESG and climate change risks. We are aware of the importance of fair and responsible allocation of resources and the influence that a banking group can have in terms of sustainability. We therefore aim to pay particular attention to managing ESG risk. Our approach to managing ESG risk is guided by an internal regulatory framework consisting of a set of internal ESG risk related guidelines. The Group Guidelines for the Governance of ESG Risks provide, amongst other things, that the Group undertakes not to finance companies and projects if these are located in areas of active armed conflict, or if evidence emerges, such as legal proceedings and judgements relating to human rights violations, of forced or child labour practices. The purpose of these Guidelines is to define: 1) a list of "sensitive sectors"; 2) general criteria to limit and exclude loans in line with the definitions set out in the document; 3) detailed criteria applicable to individual sensitive sectors through the application of specific sector regulations.

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## Rules on ESG & Reputational Risk Clearing

In line with the Group Guidelines for the Governance of Environmental, Social and Governance (ESG) Risks, ESG and reputational risks are also managed through the ESG & Reputational Risk Clearing process by Intesa Sanpaolo<sup>16</sup>. The information used for the ESG & Reputational Risk Clearing activity is based on the counterparties' disclosures and selected ESG external providers. This process aims to:

- identify and assess ex-ante potential ESG risks, including social factors such as policies to improve the working environment, labour relations, focus on non-discrimination and the promotion of diversity, labour standards, occupational health and safety conditions and respect for human rights. The potential ESG risks considered include those related to customer credit proposals, selection of suppliers<sup>17</sup>/third parties and extraordinary transactions<sup>18</sup> that modify the Group's structure;
- ensure proper ESG and reputational risk evaluation in the decision-making process. This evaluation includes various aspects, such as for example: the counterparty's operations in countries with high risk for ESG issues; the counterparty's inclusion in the list of controversial companies; the application of the Equator Principles; the counterparty's operations in high ESG risk activities; the counterparty's involvement in relevant legal disputes in terms of media / reputation; and the counterparty's involvement in media campaigns on ESG issues.

There are, in general terms, two levels of clearing in the ESG & Reputational Risk Clearing process:

- (i) first level, aimed at an initial analysis of the main ESG & Reputational risk factors and carried out by the structure that manages the relationship with the counterparty; and
- (ii) second level, aimed at deepening and evaluating any critical issues that may emerge from the first level.

First-level clearing is generally carried out through the compilation of questionnaires (based on business operations) aimed to identify counterparties, transactions and initiatives that may require additional analysis of ESG and reputational profile, by the competent functions. The second level clearing involves an expert analysis of these risk profiles and generally consists of an advisory opinion that includes an assessment of the main critical issues identified, the related mitigating factors and the level of risk attributed on the basis of proprietary metrics. In 2024 over 500 second level evaluations were conducted that found a clear predominance of credit transactions with a low ESG and reputational risk profile.

## Other rules and principles on financial product and lending

We adopt a holistic approach to financial product and lending, and we have defined specific policies, rules and dedicated structures. Intesa Sanpaolo also created a set of rules for the oil & gas sector<sup>19</sup>, coal sector<sup>20</sup> and armaments sector. The Intesa Sanpaolo Group, aware of the importance of nature and ecosystem protection, has integrated biodiversity in the Bank's governance documents developing in 2024 the Rules on Biodiversity and Nature<sup>21</sup> (adopting it from January 2025), in line with the 2022-2025 Business Plan commitment.

Furthermore, the Group has complied with the Equator Principles (EP) since 2007: Guidelines for social and environmental risk assessment and management in projects, based on criteria recommended by the International Finance Corporation, a World Bank organization.

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<sup>16</sup> The other Reporting Entities are not in scope of the process.

<sup>17</sup> For information about selection of suppliers please refer to Section 5.2.

<sup>18</sup> Intended as proprietary minority investment transactions and proprietary transactions with an impact on the organizational/business model.

<sup>19</sup> The Rules on oil&gas sector were issued by Intesa Sanpaolo in 2021, updated in 2024 and adopted by Intesa Sanpaolo Protezione S.p.A. and Intesa Sanpaolo Wealth Management S.A.

<sup>20</sup> The Rules for lending operations in the coal sector were issued by Intesa Sanpaolo in 2020, updated in 2021 and are adopted by Intesa Sanpaolo Protezione S.p.A. and Intesa Sanpaolo Wealth Management S.A.

<sup>21</sup> The Rules on biodiversity and nature were issued by Intesa Sanpaolo in 2025 and their adoption is ongoing for: Intesa Sanpaolo, Intesa Sanpaolo Wealth Management S.A. and Intesa Sanpaolo Protezione S.p.A.



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## *Policy on the integration of sustainability risks and information on the adverse impacts on sustainability factors in the provision of investment advisory services or in insurance distribution advice*

The document, prepared in accordance with Art. 3 and 4 of Regulation 2019/2088/EU, illustrates the Group's policy regarding the integration of environmental, social and governance risks in the investment advice and insurance distribution advice and provides information on how Intesa Sanpaolo considers the main negative effects on sustainability factors (Principal Adverse Impact) in its investment advisory and insurance distribution advice.

## *Group Rules on Internal Systems for reporting violations (Whistleblowing)*

The Group has adopted an internal system for reporting breaches (whistleblowing) of regulations, which harm the public interest or the integrity of the Group companies that are identified within the workplace, included potential violations of human rights, including those relating to modern slavery.

Any interested parties (employees, collaborators, suppliers, consultants, etc.) who suspect that a violation has occurred or may, occur may submit a report through specific channels available 24 hours a day (e-mail or voice messaging) on the Group's website and on the company's intranet portal, providing a detailed description of the circumstances and behaviours deemed to be in contrast with the regulations, using the Italian/English language (international language of reference), or that of the country of origin.

Each Group company puts in place appropriate safeguards vis-à-vis all those involved, ensuring the confidentiality of the information received and the identity of the whistleblower, in order to protect them from any possible retaliatory or discriminatory conduct resulting from the report.

The Chief Audit Officer is in charge of ensuring that the process is carried out correctly. In 2024, 40 reports were received on the Parent Company's Ordinary Channel, of which 3 were judged not pertinent, whereas 37 resulted in the launch of specific investigations. As required by the process, all the reports were processed, activating the relevant company structures for the related insights and evaluations, as well as for any risk mitigation measures. Dedicated whistleblowing channels are also active at the Group's International Banks, which received 10 reports, 2 of which were judged not pertinent. Overall, there were no reports regarding modern slavery in 2024 in the Group.

The Whistleblowing process integrates the other reporting systems and processes active in the Group companies (e.g. that provided for in the Code of Ethics).

## **5.2 Suppliers selection, “Supplier Gate” and “Qualification Portal” platforms**

Suppliers selection process is regulated by the Purchasing Rules. The involvement of suppliers in purchasing activities must be guided by criteria that take into account: the economic value of the asset/service to be purchased, the type of asset (e.g. replaceability), the characteristics and complexity of the supply, the risks inherent in supplier relations and type of supply (e.g. effects related to labour law, solidarity in contracts, environmental risks, etc.). Intesa Sanpaolo recognises its social and environmental responsibilities along the whole supply chain and for this reason:

(a) selects, through clear and verifiable criteria, suppliers that found their activity on social and environmental sustainability and that adopt measures and tools necessary to minimise possible negative impacts triggered by their action, using specific IT platforms for the qualification of suppliers, the Qualification Portal, and their involvement in negotiations, i.e. the Supplier Gate. In particular, the Supplier Gate Portal is the platform to manage registrations and where it is possible to interact with suppliers (e.g. collect and view supplier certifications, request questionnaires and additional documents, etc.) also available at major banks of the International Banks Division; the Qualification Portal aggregates the information collected, in addition to other internal and external sources to the Bank (e.g. info providers) and determines the Global Score and a qualification status (Green, Red, Yellow) attributed to suppliers;

(b) steers suppliers and sub-suppliers' policies towards respecting human rights, labour rights and environmental protection through general contractual standards (General Terms and Conditions) and category-specific contractual standards (Special Terms and Conditions) that recall Intesa Sanpaolo's ethical principles (i.e. transparency and supply chain responsibility) and require the utmost respect for workers' rights.

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That being said, most of Intesa Sanpaolo's and Intesa Sanpaolo Protezione's suppliers are registered on the Supplier Gate platform. As anticipated, in order to be qualified, suppliers are subject to an initial due diligence (assessing their economic/equity and reputational soundness and their inclination towards social responsibility issues), which determines the assignment of a Global Score and a qualification status (green, yellow, red). The Global Score of suppliers is the result of an algorithmic calculation executed on the Qualification Portal. The qualification status determines whether or not it is possible to award assignments to the supplier, both as main contractor and as sub-supplier: "Green" may be used freely; "Yellow" may be used subject to the approval of the Suppliers Qualification Head structure in his role as level I authorising officer; "Red" may be used subject to the approval of the Suppliers Qualification Head Office structure and of the Head of the higher-level Outsourcing Governance and Procurement Support structure, in his role as level II authorising officer.

After the suppliers have been qualified, the monitoring phase begins, which, through the daily interface of a series of internal and external information sources, any changes in the improvement or deterioration of the qualification indicators are detected, determining the update of the global score and qualification status. Interfaced sources include: the ESG score (ESG score calculated by the Bank if the supplier is also its customer or ESG score derived from the completion of an ESG questionnaire if the supplier is not a customer) and the reputational score, derived from the completion of a questionnaire on reputational risks.

Specific alarm events detected by monitoring (e.g. termination of contracts by the Public Administration, legal disputes, etc.) require the assignment of a risk level and, depending on the severity of the case, the adoption of remediation actions such as the inclusion of the supplier on a blacklist, which does not allow new assignments, or the termination of the contract. Alternatively, failure to update on the Supplier Gate Portal a document deemed critical for labour-intensive services, such as the document of regularity of contribution and assistance to workers, could make the supplier "Yellow" or "Red" and consequently make it impossible to award new assignments.

The qualification and monitoring processes adopted by Group Procurement aim to ensure transparency, regularity and equality in the choice of suppliers and to prevent possible insolvency or reputational risks.

At the end of 2024, approx. 9,200 suppliers had completed the registration procedure on the "Supplier Gate" portal and a subset of about 4,700 was qualified and being monitored by Group Procurement. Of these, almost 2,000 had received purchase orders, of which approximately 84% had "Green" status, 9% had "Yellow" status and 7% had "Red" status. The remaining suppliers concern those pertaining to banks of the International Banks Division and those that had completed the registration and could be qualified, only upon request of the Purchasing Entities before any contractual engagement.

### **5.3 Contractual arrangements with suppliers**

Intesa Sanpaolo Group requires suppliers to declare that they have read and are familiar with the contents of the Group Code of Ethics and the Group Internal Code of Conduct, through the registration process. Intesa Sanpaolo also requires them to undertake, where applicable, when fulfilling their contractual obligations, to take all necessary measures to prevent any conduct that may prove relevant under Italian Legislative Decree 231/2001 and the anti-money laundering and anti-corruption legislation.

On request, certain suppliers must also submit documentation that proves their ongoing compliance with the social and environmental obligations they have undertaken, and also the compliance of any subcontractors. Intesa Sanpaolo's General Terms and Conditions require suppliers to guarantee that the treatment of employees with respect to economic conditions, wages, pensions, insurance and accident prevention is not lower than the minimum standards outlined in applicable laws, regulations or collective bargaining agreements; suppliers must guarantee the respect of the obligations contained in the General Terms and Conditions also for the subcontractors. The General Terms and Conditions provide for the possibility of audits, e.g. by acquiring the Single Book of Labour, in order to verify compliance with the payroll. These terms and conditions oblige suppliers and subcontractors (if applicable) to operate in compliance with laws on the environment, ecology and waste management (including laws on the circulation and disposal of waste electrical and electronic equipment) and, where requested, to document this compliance at any time. All documents deposited on the portal are verified. For the suppliers subject to this monitoring, the documentation (es. chamber visura, budget and for the Italian suppliers also the contributory regularity) is required to be periodically updated. The documents are verified, confirmed and requested each time if not updated. The non-compliant suppliers would have their Global Score reduced, potentially falling into the category of suppliers the Group cannot engage. For certain categories

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of expenditure (e.g. cleaning services) the contract with the supplier may also provide for the possibility of checking the payroll, the payment of income tax, and the wage classification in relation to the collective labour agreement etc. Violations of contract clauses may be grounds for contractual termination.

Furthermore, the due diligence and risk assessment analysis was updated, taking into consideration the expectations under the UK Modern Slavery Act and the Australian Modern Slavery Act.

## 6. Measuring the effectiveness of our actions

The mechanisms already in place that allow us to assess the effectiveness of our actions include:

### (a) Human rights

The implementation and progressive improvement of human rights' protection is monitored through:

- (i) the evaluation of the implementation and governance of the Group Code of Ethics, assessed by an independent third party according to the UNI ISO 26000:2020 international standard, with a specific focus on human rights issues. The 2024 assessment reflects the Group's approach to monitoring and supervising the topic of human rights, 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 (including in terms of human rights); and the assessment of suppliers and partners (including in terms of human rights). The analysis confirmed the Group's commitment to actions and measures designed to protect the health, safety and wellbeing of its employees and customers. It also commented on the support provided by the Group, through different methods, to communities, families and businesses with a view to fostering inclusion of those in the most vulnerable situations.
- (ii) sustainability reporting, which involves stakeholder engagement and defines improvement targets and the related performance indicators, which are subject to certification by an independent third-party auditor.

### (b) Diversity, equity and inclusion

Intesa Sanpaolo was the first bank in Italy and among the first in Europe to receive, in June 2021, the Gender Equality and Diversity European & International Standard (GEEIS-Diversity), an international certification issued by an independent certifier, aimed at assessing the commitment of organisations towards diversity and inclusion. As proof of its ongoing commitment to inclusion, Intesa Sanpaolo is the first major Italian banking group to obtain gender equality certification for its commitment to diversity and inclusion according to the criteria set out in the National Recovery and Resilience Plan (NRRP) in Mission 5 "Inclusion and Cohesion". The UNI/PdR 125:2022 certification obtained by Intesa Sanpaolo is based on the Guidelines on the Management System for Gender Equality, published in March 2022 by the Italian Department for Equal Opportunities of the Presidency of the Council of Ministers as part of the commitment to gender equality enshrined in the National Recovery and Resilience Plan (NRRP) to produce sustainable and lasting change in corporate gender policies by adopting specific KPIs.

### (c) Occupational health and safety

Since 2017<sup>22</sup> Intesa Sanpaolo has implemented an Occupational Health and Safety Management System which is certified every year by an international third-party according to the ISO 45001 standard. Applied in all branches and buildings across Italy, the System ensures the continuous monitoring of objectives and is also subject to internal audits to assess if its performance levels meet expectations. Since 2023, this certification has been integrated with the ISO 45003 certificate of conformity, for the management of psychosocial risks and workplace well-being.

The ISO 45003 compliance certification obtained by the Group provides a structure for psychosocial risk management, in particular the identification of dangers and related risks through, for example, health surveillance, assessment of work-related stress, climate surveys, group and/or individual psychological support following potentially traumatic events. The risks assessed are, among others: work-related stress, robberies and aggressive and discriminatory behavior (in relation to gender, age, religion, nationality, etc.).

Intesa Sanpaolo implements a systematic approach to monitoring and measuring activities related to the

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<sup>22</sup> In 2024 Intesa Sanpaolo renewed the compliance certification of its Occupational Health and Safety Management System with the UNI ISO 45001:2018 standard.

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management of psychosocial risks and the performance of the management system for health and safety at work. To this end, the Group collects and provides data relating to psychological health and safety at work, recognizing the need for confidentiality of personal information.

Specific indicators are also used to assist in the monitoring and measurement of occupational health and safety, including for example: indicators on robberies, assaults, health data from health surveillance and number of accesses to the psychological support service offered by the Group. Findings of this information also determine the extent to which the Group has fulfilled legal and other requirements, allowing to monitor and, where necessary, review psychosocial risk control measures.

(d) Anti-corruption

Intesa Sanpaolo obtained in May 2019, as the first Italian bank, the "UNI ISO 37001:2016 Antibribery management systems" certification, issued by an independent certifier. The certification has been confirmed in subsequent years; on June 14, 2022 the independent certifier issued the certificate of compliance - valid until May, 2025 - to Intesa Sanpaolo, its operating points in Italy and abroad, and the Group's other banking, financial and insurance companies. In 2024 the second of the two maintenance audits for the purpose of maintaining the certification was completed, with the involvement of numerous Group structures. The new certification process for the three-year period 2025 - 2027 is underway.

(e) The "Supplier Gate" and "Qualification Portal" platforms

Intesa Sanpaolo is able to monitor most of the supply chain through the "Qualification Portal" platform. This platform also allows Intesa Sanpaolo to consistently evaluate suppliers on the main social, economic, financial and environmental aspects. This includes the minimum sustainability requirements and the standards of the International Labour Organization covering fundamental human rights, child labour, freedom of association, health and safety and business ethics. Suppliers are expected to be familiar with, inter alia, the Organization, Management and Control Model under Legislative Decree 231/2001, the Group Code of Ethics and the Group Internal Code of Conduct – the supplier cannot register if he does not confirm that he has acknowledged the documents mentioned, which are made available on "Supplier Gate" platform.

## 7. Consultation

This modern slavery statement has been prepared pursuant to section 54 of the UK Modern Slavery Act and section 13 of the Australian Modern Slavery Act in respect of the financial year from 1 January 2024 to 31 December 2024.

In preparing this modern slavery statement, the relevant directors and officers of the reporting entities making this statement were consulted and provided with an opportunity to review the statement prior to its approval.

## 8. Any other relevant information

In the 2022-2025 Business Plan, Intesa Sanpaolo made a commitment to disburse 25 billion euro of social lending throughout the whole period and in 2024 the Group disbursed new loans for about 5,6 billion euro<sup>23</sup>, equal to 8% of all loans disbursed. The Bank has thus contributed to creating business and employment opportunities and to helping people in difficulty through various forms, as set out in the Business Plan: anti usury loans; products and services for associations and bodies in the Third Sector; products dedicated to the most vulnerable social groups to promote their financial inclusion; loans to support populations affected by disasters; other social loans.

More information about our commitment to social inclusion and support to the most vulnerable segments of the population, can be found in our 2024 SDGs Report [\[1\]](#).

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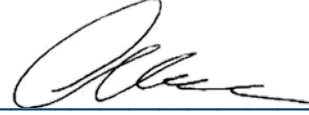
<sup>23</sup> Reporting follows the Rules for the classification of credit products and sustainable lending transactions approved by the Group at the end of 2022 and, in addition, the support loans provided in the event of natural disasters and for urban regeneration. For further details see the 2024 SDGs Report [\[1\]](#).

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## 9. Board approval

- (a) This statement has been approved by the Board of Directors of Intesa Sanpaolo, on 27th March 2025, being the principal governing body of the reporting entity under the Australian Modern Slavery Act and one of the reporting entities for the purposes of the UK Modern Slavery Act.

*Carlo Messina – Managing Director and CEO*



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- (b) This statement has also been approved by the relevant corporate bodies of the following entities that are required to file a statement under the UK Modern Slavery Act:

- (i) Intesa Sanpaolo Protezione S.p.A.

*Massimiliano Dalla Via – General Manager and CEO*



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- (ii) Intesa Sanpaolo Wealth Management S.A.

*Marc Flammang – CEO*



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