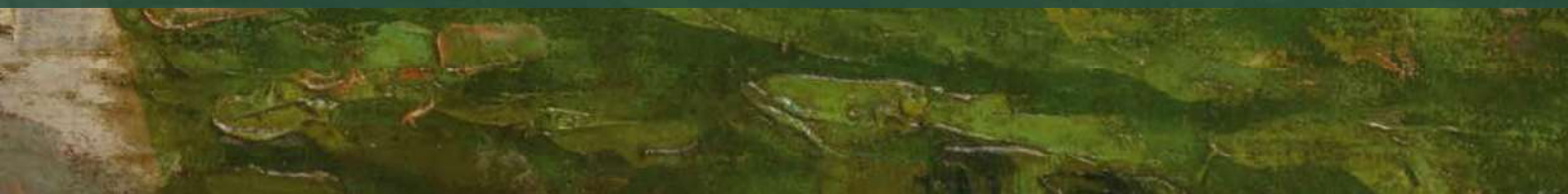


Human rights protection



Human rights protection

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	218
Group's people	Combating the harassment of employees	page	205
Group's people	Freedom of association	page	192
Group's people	Non-discrimination, equal opportunities and fair remuneration	page	205
Group's people	Family life through work-life balance policies	page	213
Group's people	Safeguarding social security with supplementary pensions	page	213
Customers	Policies and solutions for combating robberies	page	124
Customers/People	Privacy of personal and sensitive data	page	109
Customers	Financial inclusion of the most vulnerable social groups	page	142
Suppliers	Inclusion of criteria for respecting human rights in the supply chain	page	263
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	67
Community	Culture and charitable activities promoting a respect for human rights	page	176
Environment	All	pages	226;246

With reference to financial year 2022, in 2023 the Group once again published the Modern Slavery 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 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. The process of updating the Modern Slavery Statement includes an overall assessment of potential relevant risks and the continuous updating of legal requirements, based on the Group's operations.

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	2022	2023
Accidents in the workplace	168	183
Group employees belonging to a union (% of total)*	65.2%	63.5%
Group part-time employees (% of total)	12.4%	12.2%
Reports of non-compliance with the Code of Ethics for alleged discrimination	11	13
Court cases for mobbing**	2	3
Cases of customer data being lost or stolen reported to the Data Protection Authority/Local Authority	18	19
Robberies - Number of events per 100 branches	0.35%	0.12%
Suppliers registered on Supplier Gate*** (no.)	9,770	10,641
Projects subject to Equator Principles screening****:		
Number	18	30
Amount granted (millions of euro)	1,081	3,889
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 76.13%.

** There are three 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 2023 the amount granted subject to Equator Principles screening stood at 13.5% 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. The 2023 certification shows how the topic of human rights is subject to constant monitoring and supervision, both within the Group (workers' rights) and externally, via: 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.

More specifically, 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 a close understanding of the most vulnerable situations, support was also provided, through different methods and actions, to communities, families and businesses to counter and better manage the challenges of the economic and social context that people are forced to contend with. Close attention was focused on this issue, particularly among the international subsidiary banks directly involved in the activity, with numerous initiatives designed to support the community.

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 the commitments it has undertaken towards the main Group stakeholders (employees, customers, suppliers, communities) with the aim of supporting the protection of human rights according to the principles of the Universal Declaration and subsequent international conventions. These principles are also referenced in other internal documents (e.g. the Code of Ethics). Procedures are 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; no activities connected with a specific human rights risk map with related order of priority were reported.
Risk situations for human rights	Aware that its activities can generate direct or indirect impacts on human rights, the Group undertakes to respect human rights in the event of exposure to one or more risk situations, through the adoption and implementation of procedures designed to manage specific situations (e.g. Group Rules on internal whistleblowing systems, Regulations for combating sexual harassment), and to promote initiatives, activities and services that respond to specific social requirements to support Group people in situations of conflict and that promote the financial inclusion of the most vulnerable subjects. The Modern Slavery Statement, which contains the measures adopted by the Group to combat the risk of slavery in its supply chain and activities and the commitments it has undertaken in the area of human rights, was published in 2023 in reference to 2022.
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 established international principles. 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 "Group Guidelines for the Governance of Environmental, Social and Governance (ESG) Risks". 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. The initiatives promoted in the area of diversity and inclusion aim to protect human rights, guaranteeing equal opportunities for all and preventing all forms of discrimination.</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. 2023 saw the updating of the Rules for Combating Sexual Harassment, which 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, introducing a dedicated email account. 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. Around 77% of employees in Italy and around 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. Diversity, equity and inclusion principles and Rules for combating sexual harassment). In Italy, the Occupational Medicine and Psycho-Social Risks Office has been 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>

N.B.: 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.

* 2022 data available on the date of the audit performed by the third party appointed by the Group. See the previous table, "Indicators", for 2023 data.