



2021 Modern Slavery Statement  
Intesa Sanpaolo



INTESA  SANPAOLO

 EURIZON  
ASSET MANAGEMENT

 FIDEURAM  
INTESA SANPAOLO  
PRIVATE BANKING

 INTESA SANPAOLO  
ASSICURA

 INTESA SANPAOLO  
BANK LUXEMBOURG

 INTESA SANPAOLO  
BANK IRELAND

 INTESA SANPAOLO BANK  
Slovenia

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## Introduction

Intesa Sanpaolo Group (hereinafter, the “**Group**”) launched the 2022-2025 Business Plan, in which ESG issues represent one of the four pillars for solid and sustainable value creation and for further strengthening Intesa Sanpaolo’s leadership in sustainability, and where it is stated 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 World and Europe Sustainability Indices and ranks first among its peers by MSCI, Sustainalytics and Bloomberg (ESG Disclosure Score). In 2021, Intesa Sanpaolo was also classed as the best European bank and the best Italian company for ESG aspects in the Institutional Investor ranking. In October 2021, Intesa Sanpaolo was included in the Euronext - Borsa Italiana MIB ESG Index. Intesa Sanpaolo participates in the UN Global Compact initiative and is an active member of the community of businesses that support the UN’s Sustainable Development Goals, set by the UN’s 2030 Agenda and signed by 193 countries, including Italy, at the end of 2015.

Intesa Sanpaolo's Principles on Human Rights set out the commitment of the Group to human rights. As set out in the Principles on Human Rights, 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 causes or contributes to, or which are directly linked to its own activities, in accordance with the UN Guiding Principles on Business and Human Rights (**UNGPs**).

## 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 during the reporting period 1 January 2021 to 31 December 2021 (**Financial Year 2021**) and is a statement made 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 14 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 Australian Modern Slavery Act or the UK Modern Slavery Act (hereinafter, the “**Reporting Entities**”):

- (a) Intesa Sanpaolo<sup>1</sup> which has branches located in the UK and in Australia (ABN 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;
- (b) the following subsidiary companies<sup>2</sup> owned and/or controlled by Intesa Sanpaolo S.p.A. are required to file a statement under the UK Modern Slavery Act:

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<sup>1</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.

<sup>2</sup> As at the date of this document, Eurizon Capital SGR S.p.A., Intesa Sanpaolo Bank Ireland Plc. and Intesa Sanpaolo Bank Luxembourg SA applied to cancel their authorisation to operate in the UK; Intesa Sanpaolo Assicura S.p.A. currently has a contractual run off authorisation.

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- (i) Eurizon Capital SGR S.p.A.<sup>3</sup>
  - (ii) Fideuram Asset Management (Ireland) DAC<sup>4</sup> (including its London Branch)
  - (iii) Intesa Sanpaolo Assicura S.p.A.<sup>5</sup>
  - (iv) Intesa Sanpaolo Bank Luxembourg SA<sup>6</sup>
  - (v) Intesa Sanpaolo Bank Ireland Plc<sup>7</sup>
  - (vi) Banka Intesa Sanpaolo d.d.<sup>8</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 Australian Modern Slavery Act and the UK Modern Slavery Act.

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<sup>3</sup> Eurizon Capital SGR S.p.A. Registered Office: P.ta G. Dell'Amore 3 - 20121 Milan – Italy. Share Capital Euro 99,000,000.00 Company Register and Fiscal Code No. 04550250015. “Intesa Sanpaolo” VAT Group representative Vat Code No. 11991500015 (IT11991500015). National Asset Manager Register at numbers 2 (AIFM) and 3 (UCITS).

<sup>4</sup> Fideuram Asset Management (Ireland) dac. Regulated by the Central Bank of Ireland, a subsidiary of Fideuram – Intesa Sanpaolo Private Banking S.p.A. (Intesa Sanpaolo Group). Address: International House, 3 Harbourmaster Place, IFSC, Dublin D01 K8F1 – Ireland. Share Capital Euro 1,000,000 – Registered in Dublin, Ireland, Company's Registration n. 349135 – VAT n. IE 6369135L.

<sup>5</sup> Intesa Sanpaolo Assicura S.p.A Registered Office: Corso Inghilterra, 3 10138 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).

<sup>6</sup> Intesa Sanpaolo Bank Luxembourg S.A., Registered Office: 28 Boulevard de Kockelscheuer L-1821 Luxembourg, RCS Luxembourg B-13859 – T.V.A. LU 109 676 28.

<sup>7</sup> Intesa Sanpaolo Bank Ireland PLC, a bank regulated by the Central Bank of Ireland, is a member of the INTESA SANPAOLO GROUP Registered in Ireland No.125216 – VAT Reg. No. IE 4817418C. Address: International House, 3 Harbourmaster Place, IFSC, Dublin D01 K8F1.

<sup>8</sup> Banka Intesa Sanpaolo d.d., Pristaniška ulica 14, 6502 Koper, Slovenija, registration number: 5092221000, ID za DDV: SI98026305, registration authority: District Court in Koper, share capital: 22.173.218,16 EUR, BIC: BAKOSI2X, settlement account: SI56 0100 0000 1000 153.

# Our Structure, Operations and Supply Chains

## Structure and Operations

Intesa Sanpaolo is Italy's largest bank. Intesa Sanpaolo has approximately 13.5 million customers and over 3,700 branches in Italy. Intesa Sanpaolo also has an international presence, with approximately 1,000 branches and 7.1 million customers, including subsidiary banks operating in commercial banking in 12 countries in Central/Eastern Europe and in the Middle East and North Africa.

### The Intesa Sanpaolo Group: presence in Italy as at 31 December 2021

#### Banks



#### NORTH WEST

INTESA SANPAOLO Branches	Subsidiaries	
	Company	Branches
1,099	Banca 5	1
	Fideuram	107
	IWBANK	9

#### NORTH EAST

INTESA SANPAOLO Branches	Subsidiaries	
	Company	Branches
739	Fideuram	59

#### CENTRE

INTESA SANPAOLO Branches	Subsidiaries	
	Company	Branches
769	Fideuram	46
	IWBANK	6

#### SOUTH

INTESA SANPAOLO Branches	Subsidiaries	
	Company	Branches
644	Fideuram	26
	IWBANK	7

#### ISLANDS

INTESA SANPAOLO Branches	Subsidiaries	
	Company	Branches
218	Fideuram	10

Figures as at 31 December 2021

#### Product Companies



Bancassurance and Pension Funds



Leasing and Consumer Credit (\*)



Asset Management



Fiduciary Services

\* Leasing and Consumer Credit activities are also carried out directly by Intesa Sanpaolo S.p.A., the Parent Company.

## The Intesa Sanpaolo Group: international presence as at 31 December 2021

### Banks, Branches and Representative Offices



#### 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	

Country	Subsidiaries	Branches
UAE	Reyl	1

#### EUROPE

Direct Branches	Representative Offices
Frankfurt	Brussels <sup>(1)</sup>
Istanbul	Moscow
London	
Madrid	
Paris	
Warsaw	



Country	Subsidiaries	Branches
Albania	Intesa Sanpaolo Bank Albania	35
Bosnia and Herzegovina	Intesa Sanpaolo Banka Bosna i Hercegovina	47
Croatia	Privredna Banka Zagreb	153
Czech Republic	VUB Banka	1
Hungary	CIB Bank	61
Ireland	Intesa Sanpaolo Bank Ireland	1
Luxembourg	Fideuram Bank Luxembourg Intesa Sanpaolo Bank Luxembourg	1 1
Moldova	Eximbank	17
Romania	Intesa Sanpaolo Bank Romania	33
Russian Federation	Banca Intesa	27
Serbia	Banca Intesa Beograd	147
Slovakia	VUB Banka	167
Slovenia	Intesa Sanpaolo Bank	44
Switzerland	Reyl Intesa Sanpaolo Private Bank (Suisse) Morval	3 2
The Netherlands	Intesa Sanpaolo Bank Luxembourg	1
Ukraine	Pravex Bank	45
United Kingdom	Intesa Sanpaolo Private Bank (Suisse) Morval	1

#### AFRICA

Representative Offices	Country	Subsidiaries	Branches
Cairo	Egypt	Bank of Alexandria	175

Figures as at 31 December 2021  
(1) European Regulatory & Public Affairs

### Product Companies



E-money and Payment Systems



Leasing

Wealth Management

Further information about our international presence can be found here. [1]

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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 25 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. Intesa Sanpaolo Bank Luxembourg SA and Intesa Sanpaolo Bank Ireland Plc are part of this division.

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

(4) **Private Banking division**, which serves private clients and high net worth individuals. Fideuram Asset Management (Ireland) is part of this division.

(5) **Asset Management division**, targeted at the Group's customers, commercial networks outside the Group, and the institutional clientele. The division includes, among others, Eurizon Capital SGR S.p.A., with 354 billion euro of assets under management on 31 December 2021.

(6) **Insurance division**, which holds direct deposits and technical reserves of 204.5 billion euro in December 2021 and includes<sup>9</sup> Intesa Sanpaolo Vita, which controls Intesa Sanpaolo Assicura, Intesa Sanpaolo Life, Intesa Sanpaolo RBM Salute, Intesa Sanpaolo Insurance Agency, Fideuram Vita and Cargeas Assicurazioni<sup>10</sup>.

Intesa Sanpaolo's branch in the UK, located in London, forms part of the IMI Corporate and 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. Eurizon Capital SGR and Fideuram Asset Management each have operations in the UK. These entities provide investment and advisory services and are authorised and regulated by the Financial Conduct Authority in the UK.

The Australian branch of Intesa Sanpaolo is located in Sydney and forms part of the IMI Corporate & Investment Banking division. The Sydney branch focuses on commercial lending and wholesale banking – particularly on infrastructure, energy, syndicated finance and bilaterals, with an emphasis on large corporate mergers and acquisitions.

Further information about our organisational structure on 31 December 2021 can be found here. [\[1\]](#)

For Financial Year 2021, the Group directly employed 96,681 employees. Intesa Sanpaolo's branch in Australia employs 11 people, all of which are employed on a permanent full-time basis. The UK branches of Intesa Sanpaolo and Fideuram Asset Management (Ireland) DAC have a total workforce of 265 employees. Of these, 17 are casual workers and 5 are employed on a part-time basis. The other Reporting Entities do 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 2021) can be found in our 2021 Consolidated Non-financial Statement. [\[1\]](#)

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<sup>9</sup> During the reporting period the Insurance division also included Assicurazioni Vita S.p.A., Lombarda Vita S.p.A. and BAP Assicurazioni, all merged into Intesa Sanpaolo Vita on 31st december 2021

<sup>10</sup> Cargeas Assicurazioni S.p.A. was merged into Intesa Sanpaolo Assicura S.p.A. on 1<sup>st</sup> October 2022



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## Nature of our supply chains

Top categories of centralised<sup>11</sup> 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 within this procurement category include: rental expenses, furniture and furnishings, maintenance of owned properties, 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.
- (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.

## The risks of modern slavery practices in our operations and supply chains

### 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.

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 chains. 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. We may also be directly linked to modern slavery risks through our business relationships with business partners and investees. In this regard, we have issued specific Group Guidelines for the Governance of ESG Risks (see page 12) and constituted the ESG & Reputational Risk Clearing (see page 13).

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<sup>11</sup> The group procurement model is structured in two models: in the "centralised procurement" model the Procurement Head Office Department directly carries out the purchasing activities for the group entities or assists them; while in the "independent procurement" model, the group entities carry out independently the purchasing activities, according to their own processes, as regards commodity categories which are not covered by the centralised procurement process. The principles and rules defined in Guidelines and in the Procurement Rules described below apply to both model.

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

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

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## Supply Chain

The risk of modern slavery within our supply chain is considered to be low because we aim to assess the majority of our suppliers across various metrics including (but not limited to) business ethics, respect for human rights, workers' rights and the environment. That said and having regard to our top categories of procurement spend, we have identified that there are two categories of suppliers which are potentially at higher risk of modern slavery. These are suppliers within the 'information and communication technology' industry category and suppliers within the 'real estate' industry category. Products and services within these categories typically involve complex supply chains. We have less visibility of the lower tiers of these supply chains, which is why we have assessed these industry categories as being at a higher risk of modern slavery.

## 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.

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 processes and policies to address the risks of modern slavery in our operations and supply chains are detailed below. These processes and policies aim to apply across the Group worldwide, including the Reporting Entities covered by this modern slavery statement.

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## Policies

The policy framework outlined below defines areas of responsibility towards each stakeholder, from employees and customers, to suppliers. These policies are made available to employees (for instance on the internal company intranet), who also receive training on the content of these policies.

### Group Code of Ethics

The Group Code of Ethics is a voluntary, self-regulating tool that is an integral part of the Group's risk management strategy. It 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 Group Code of Ethics 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 Group Code of Ethics 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.

### Group Internal Code of Conduct

The Group Internal Code of Conduct includes a prohibition on activity aimed at harming human dignity and aims to ensure that all recipients of the code maintain the utmost respect for every person's dignity and personality. This is applicable across our business 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.

### Principles of Human Rights

Adopting a human rights commitment is key to managing modern slavery risk. Our commitment to human rights is described in the Principles of Human Rights<sup>14</sup>. This is brought to employees' attention through digital contents informed by their respective areas of operation, roles and responsibilities. There is a section of this Policy which applies directly to suppliers. The following principles from the Policy derive from the established principles into 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 and Inclusion Principles

The Principles confirm and make more effective Group's commitment to implement and disseminate – inside and outside of the Group – a policy for the inclusion of all forms of diversity (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 or any other feature of each individual, also including the expression of one's own thought).

### Group Anti-Corruption Guidelines

The 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 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.

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## Group Procurement Guidelines

The Group Procurement Guidelines<sup>15</sup> require that in regard to sourcing and procurement we (amongst other things) 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. The Group Procurement Guidelines also require that we comply 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.

## Group Guidelines for the Governance of 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, responsible allocation of the 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<sup>16</sup> 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, or 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.

## 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<sup>17</sup>, prepared in accordance with Art. 3 and 4 of Regulation 2019/2088/EU, illustrates Intesa Sanpaolo's policy regarding the integration of environmental, social and governance sustainability risks 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.

## Rules for combatting sexual harassment

The Rules<sup>18</sup> 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.

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

Since 2016, a whistleblowing system has been in place, which allows employees to report actions or occurrences that could constitute breaches of the regulations governing banking activities (whistleblowing).

Whistleblowing, which ensures the confidentiality of the individual making the report without the risk of retaliatory, unfair or discriminatory behaviour, encourages employees (including suppliers and consultants) to report acts or conduct they become aware of that may constitute a breach of the regulations governing banking activities or related activities that may also be instrumental to a breach or other illicit conduct.

Whistleblowing reports are managed through communication channels specified in the Group Rules on Internal Systems for reporting violations (Whistleblowing), while for reports of alleged non-compliance with the code of ethics specific e-mail addresses are available.

## Other rules and principles on financial product and lending

We adopt a holistic approach to financial product and lending, and we defined specific policies, rules and dedicated structures. Intesa Sanpaolo defined also a set of rules for lending operation in the unconventional oil & gas sector, coal sector and armaments sector.

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<sup>15</sup> Specifically, Fideuram Asset Management (Ireland) DAC adopted the “Group Procurement Guidelines” in 2022.

<sup>16</sup> These Guidelines (defined on 2021 and updated on 2022) during the reporting period applied to Intesa Sanpaolo SpA, Intesa Sanpaolo Assicura SpA, Intesa Sanpaolo Bank Ireland Plc and Banca Intesa Sanpaolo d.d.. It is intended that the Guidelines will be adopted by other Group entities in the future.

<sup>17</sup> This Policy (defined in 2021 and updated on 2022) during the reporting period consisted of two separate documents, one for Article 3 and one for Article 4 of Regulation 2019/2088/EU

<sup>18</sup> Specifically, Eurizon Capital SGR adopted the “Rules for combatting sexual harassment” in 2022..



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Furthermore:

- complies 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;
- constituted the ESG & Reputational Risk Clearing, which is aimed at the ex-ante identification and assessment of the potential reputational and ESG risks associated with the most significant business operations, the main capital budget projects and the selection of the Intesa Sanpaolo's suppliers/partners.

## **Supplier selection and the 'Supplier Gate' platform**

Intesa Sanpaolo recognises its social and environmental responsibilities along the whole supply chain and for this reason, Intesa Sanpaolo:

- (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; and
- (b) steers suppliers and sub-suppliers' policies towards respecting human rights, labour rights and environmental protection.

Most of Intesa Sanpaolo's, Eurizon Capital SGR SpA's and Intesa Sanpaolo Assicura SpA's suppliers are registered onto an e-sourcing application platform called 'Supplier Gate'. This platform assesses suppliers on a number of factors, including economic-financial and technical-organisational characteristics of each supplier, and the ethics of the business, respect for human rights, workers' rights and the environment. A positive assessment means that suppliers are registered with the Group Suppliers Master and can be invited to tender for certain services which the Group may require. The supplier assessment process through the 'Supplier Gate' platform aims to ensure transparency, regularity and equality in the verification, control and monitoring of suppliers. With regard to the checks carried out on suppliers and third parties, when registering with 'Supplier Gate' the supplier is required to complete a mandatory questionnaire on social and environmental responsibility issues and provide supporting documentation. Inspections regarding compliance with social criteria are conducted by internal staff and involve technical documents regarding buildings (maintenance) and people (cleaning).

## **Contractual arrangements with suppliers**

Intesa Sanpaolo through the 'Supplier Gate' portal 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. 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 standard 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. These standard contractual 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.

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## 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 international standard, with a specific focus on human rights issues;
- (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 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.

(c) Occupational Health and Safety

Since 2017 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.

(d) Anti-corruption

Intesa Sanpaolo obtained in May 2019, as the first Italian bank, the "UNI ISO 37001:2016 Anti-bribery 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 6, 2025 - to Intesa Sanpaolo, its operating points in Italy and abroad, and the Group's other banking, financial and insurance companies.

(e) The 'Supplier Gate' platform

Intesa Sanpaolo is able to monitor most of the supply chain through the 'Supplier Gate' 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 platform is able to monitor whether a supplier has viewed these documents. For Financial Year 2021 there were 10,058 suppliers registered on the 'Supplier Gate' platform. 5,999 of these suppliers were based in Italy and 3,834 were based in other parts of Europe. 225 were from other countries around the world. Approximately 98% of the total order value relates to suppliers based in Europe.

## Consultation

This modern slavery statement has been prepared pursuant to section 54 of the UK Modern Slavery Act and section 14 of the Australian Modern Slavery Act in respect of the financial year from 1 January 2021 to 31 December 2021.

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.

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## Any other relevant information

The impacts of COVID-19 are widely recognised as increasing the risk of modern slavery, particularly amongst vulnerable groups within society. In Financial Year 2021 we took a number of measures to protect our employees and customers during the COVID-19 pandemic, focusing first and foremost on our people and prioritising their health, safety and well-being.

In addition, with a view to fostering inclusion and proximity to the most vulnerable situations, support was also provided in various ways to communities, families and businesses to counter the effects generated by the difficult economic and social context that characterised 2021.

For Financial Year 2021, we aimed to support vulnerable groups of society by issuing new loans for high social impact activities amounting to about 20.6 billion euro, 14 billion of which were to support production systems during the health emergency, helping to create business and employment opportunities and also to assist people in difficulty with various initiatives, for example: microfinance; anti-usury loans; products for the most vulnerable social groups to support their financial inclusion; loans to support people affected by disasters.

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## Board Approval

- (a) This statement has been approved by the Board of Directors of Intesa Sanpaolo, on 25th November 2022, 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*

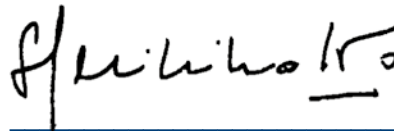


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- (b) This statement has also been approved by the competent corporate bodies of the following entities that are required to file a statement under the UK Modern Slavery Act:

- (i) Eurizon Capital SGR SPA

*Saverio Perissinotto – General Manager and CEO*



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- (ii) Fideuram Asset Management (Ireland) DAC (including its London Branch)

*Roberto Mei – Managing Director*



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- (iii) Intesa Sanpaolo Assicura SpA

*Alessandro Scarfò – General Manager and CEO*



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- (iv) Intesa Sanpaolo Bank Luxembourg SA

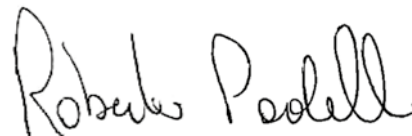
*Massimo Torchiana – Managing Director and CEO*



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- (v) Intesa Sanpaolo Bank Ireland Plc

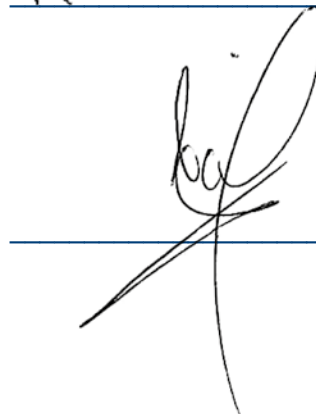
*Roberto Paoletti – Managing Director*



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- (vi) Banka Intesa Sanpaolo d.d.

*Jozef Kausich – President*



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