



2023 Modern Slavery Statement
Intesa Sanpaolo

INTESA  SANPAOLO

 FIDEURAM
ASSET MANAGEMENT IRELAND

 INTESA SANPAOLO
WEALTH MANAGEMENT
Luxembourg

 INTESA SANPAOLO
ASSICURA

 INTESA SANPAOLO
BANK LUXEMBOURG

 INTESA SANPAOLO
BANK IRELAND

 INTESA SANPAOLO BANK
Slovenia

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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 issues represent one of the four pillars for solid and sustainable value creation and further strengthen Intesa Sanpaolo’s leadership in sustainability. In the Business Plan, 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, ranks first among peer group by Bloomberg (ESG Disclosure Score) and Sustainalytics, obtaining for the first time in 2024 the ESG Top-Rated Industry and ESG Top Rated Regional badges, which include the companies with the best ESG Risk Ratings by Sustainalytics. Intesa Sanpaolo is ranked as the top European bank and the second in the world in the Corporate Knights 2024 “Global 100 Most Sustainable Corporations in the World” index and was also listed for the sixth consecutive year in the 2023 Bloomberg Gender-Equality Index, as the number-one bank in Europe and the only Italian bank in the 2023 Refinitiv Global Diversity and Inclusion Index 2023. In addition, it was recognised as the Top Employer 2024 for the third year in a row by the Top Employers Institute and received the Best Talent Acquisition Team award as part of the 2023 LinkedIn Talent Awards. In the 2023 ranking by Institutional Investor, Intesa Sanpaolo was ranked first in Europe for ESG aspects. 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* [1] 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**”).

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 2023 to 31 December 2023 (**Financial Year 2023**) 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 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 Sanpaolo¹ which has branches located in the UK (BR000036) 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. 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 Act²:
 - (i) Fideuram Asset Management (Ireland) DAC³

¹ 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.

² As from 24 November 2022, Eurizon Capital SGR S.p.A. was no longer authorized to operate in the UK, and is therefore not a Reporting Entity under the UK Modern Slavery Act for the purposes of this year’s statement.

³ Fideuram Asset Management (Ireland) DAC. Regulated by the Central Bank of Ireland. 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. Effective as of 6 September 2023 Fideuram Asset Management (Ireland) DAC is no longer authorized to operate in the UK.

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- (ii) Intesa Sanpaolo Wealth Management S.A.⁴
 - (iii) Intesa Sanpaolo Assicura S.p.A.⁵
 - (iv) Intesa Sanpaolo Bank Luxembourg S.A.⁶
 - (v) Intesa Sanpaolo Bank Ireland Plc⁷
 - (vi) Banka Intesa Sanpaolo d.d.⁸

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.

⁴ 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. LU LU21282223. Intesa Sanpaolo Wealth Management S.A. 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).

⁵ 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). Intesa Sanpaolo Assicura S.p.A. currently has a contractual run off authorization to operate in the UK.

⁶ 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. Effective as of 13 June 2023 Intesa Sanpaolo Bank Luxembourg S.A. is no longer authorized to operate in the UK.

⁷ Intesa Sanpaolo Bank Ireland Plc, a bank regulated by the Central Bank of Ireland, is part of Intesa Sanpaolo Group. Registered in Ireland No.125216 – VAT Reg. No. IE 4817418C. Address: International House, 3 Harbourmaster Place, IFSC, Dublin D01 K8F1. Effective as of 10 May 2023 Intesa Sanpaolo Bank Ireland Plc is no longer authorized to operate in the UK.

⁸ 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. Effective as of 5 December 2023 Banka Intesa Sanpaolo d.d. is no longer authorized to operate in the UK.

3. Our Structure, Operations and Supply Chains

3.1 Structure and Operations

Intesa Sanpaolo is Italy's largest bank. Intesa Sanpaolo has approximately 13.6 million customers and over 3,300 branches in Italy. Intesa Sanpaolo also has an international presence, with over 900 branches and 7.2 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 of 31 December 2023

Banks

INTESA  SANPAOLO

 FIDEURAM
INTESA SANPAOLO
PRIVATE BANKING

 isybank



NORTH WEST
Branches
1,070

NORTH EAST
Branches
702

CENTRE
Branches
715

SOUTH
Branches
623

ISLANDS
Branches
213

Figures as at 31 December 2023

Product Companies*

 FIDEURAM
VITA

 INTESA SANPAOLO
ASSICURA

 INTESA SANPAOLO
INSURANCE AGENCY

 INTESA SANPAOLO
RBM SALUTE

 INTESA SANPAOLO
VITA

 In Salute
SERVIZI

 PRESTITALIA

Bancassurance and Pension Funds

Consumer Credit**

 EURIZON
ASSET MANAGEMENT

Asset Management

 SIREF
FIDUCIARIA

Fiduciary Services

* Factoring and Leasing activities are carried out directly by Intesa Sanpaolo S.p.A., the Parent Company.
** 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 2023

Banks, Branches and Representative Offices

INTESA SANPAOLO



AMERICA

Direct Branches	Representative Offices
New York	Washington D.C.

Country	Subsidiaries	Branches
Brazil	Intesa Sanpaolo Brasil	1

AUSTRALIA/OCEANIA

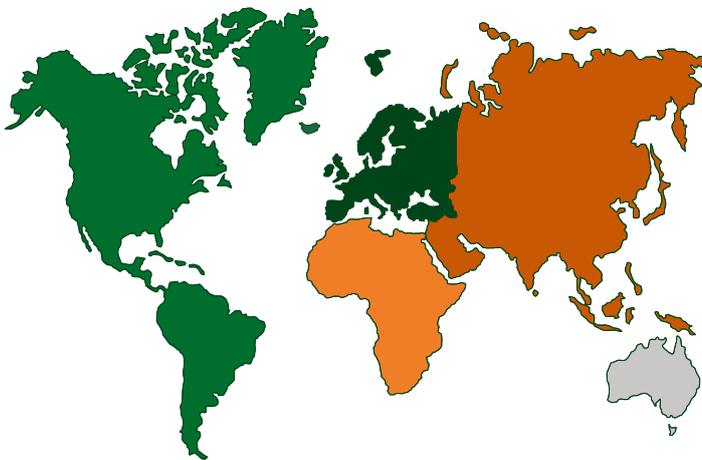
Direct Branches
Sydney

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	142
Czech Republic	VUB Banka	1
Hungary	CIB Bank	60
Ireland	Intesa Sanpaolo Bank Ireland	1
Luxembourg	Intesa Sanpaolo Wealth Management Intesa Sanpaolo Bank Luxembourg	1
Moldova	Eximbank	17
Romania	Intesa Sanpaolo Bank Romania	34
Russian Federation	Banca Intesa	27
Serbia	Banca Intesa Beograd	143
Slovakia	VUB Banka	156
Slovenia	Intesa Sanpaolo Bank	40
Switzerland	Reyl Intesa Sanpaolo	3
Ukraine	Pravex Bank	40

AFRICA

Representative Offices	Country	Subsidiaries	Branches
Cairo	Egypt	Bank of Alexandria	173

Figures as at 31 December 2023
* European Regulatory & Public Affairs

Product Companies



Wealth Management



Leasing

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 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 S.A. 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 VÚB 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, VÚB 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) DAC and Intesa Sanpaolo Wealth Management S.A. are 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 311 billion euro⁹ of assets under management on 31 December 2023.

(6) **Insurance division**, which holds direct deposits and technical reserves of 173 billion euro in December 2023 and includes Intesa Sanpaolo Vita¹⁰ - which controls Intesa Sanpaolo Assicura, Intesa Sanpaolo RBM Salute, Fideuram Vita, Intesa Sanpaolo Insurance Agency and InSalute Servizi.

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 2023 can be found here [\[i\]](#).

For Financial Year 2023, the Group directly employed 93,759 employees. As of 31 December 2023, Intesa Sanpaolo's branch in Australia employed 18 people.

The UK branch of Intesa Sanpaolo had a total workforce of 240 employees: of these, 12 were casual workers and 7 were employed on a part-time basis.

As of 31 December 2023, 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 2023) can be found in our 2023 Consolidated Non-financial Statement [\[i\]](#).

⁹ Net of duplications.

¹⁰ On 1st December 2023, Intesa Sanpaolo Vita incorporated Intesa Sanpaolo Life, while establishing a secondary office in Dublin, called Intesa Sanpaolo Vita Dublin Branch.

3.2 Nature of our supply chains

Top categories of centralised¹¹ 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, 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 2023 there were 10,641 suppliers registered on the “Supplier Gate” platform¹². 5,638 of these suppliers were based in Italy and 4,672 were based in other parts of Europe. 331 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 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 chains

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 practices¹³. The same can be said for the workforce based in the UK and Australia¹⁴.

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.

¹¹ The Group procurement model is structured in two models: (i) in the “centralised purchasing” model the Procurement Head Office Department directly carries out the purchasing activities for the Group entities or assists them, and (ii) in the “independent purchasing” model, the Group entities carry out independently the purchasing activities, according to their own processes, with regards to the commodity categories that are not covered by the centralised procurement model. The principles and rules defined in the Guidelines and in the Purchasing Rules described below apply to both models.

¹² Detailed information on Supplier Gate can be found in Section 5.2 (page 16).

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

¹⁴ <https://www.globallslaveryindex.org/>

(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 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 14), (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 14).

The ESG Score is a qualitative-quantitative assessment that analyzes 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. 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 was integrated into our IT systems with a fully digitalized process and now covers over 232,000 counterparties with approx. €170bn in loans. During 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 and to assess corporate clients operating in a first batch of countries of the International Subsidiary Banks Division.

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 2023, 65% 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 relation to the possession of documents certifying that the suppliers have fulfilled their obligations to pay social contributions for their employees, in 2023, the Procurement Head Office Department carried out approximately 15,700 compliance checks on the documents uploaded to Supplier Gate. 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 “Information and Communication Technology (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 supervisory services 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.

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, in its Consolidated Non-financial Statement drawn up at Group level.

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 chains 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, from employees and customers, to 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 employees (for instance on the internal company intranet), who also receive training on the content of these policies.

Overall, in 2023, ESG training accounted for approximately 19% of total training; around 86,800 Group employees (around 93% of the total) have benefited from more than 1 million hours of ESG training. The topics covered cut across ESG areas: in particular, a new collection of mandatory training modules on the Group Code of Ethics was published, following the update of the document. We have also decided to develop a mandatory training course on Modern Slavery topics in 2024 targeted at all Group's employees.

Group Code of Ethics

The Group Code of Ethics [i] 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 was updated in 2023 with the approval of the Board of Directors of Intesa Sanpaolo and now also extends to topics relevant to modern slavery such as the principle of "Equality and Inclusion". The new version also includes a reference to the new 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 new version includes the updating of the Group's commitments on sustainability topics at an international level. The Code of Ethics 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. The Code of Ethics 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 Internal Code of Conduct of the Group 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 amendments to the Group Internal 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 [i] currently applies to all companies of Intesa Sanpaolo Group; however, in March 2024, our Group Internal Code of Conduct was updated by Intesa Sanpaolo and the latest updated text (that, in any case, didn't amend the section related to "person's dignity and personality") is in the process of being adopted by each company of the Intesa Sanpaolo Group.

In the Group Internal Code of Conduct, activity aimed at harming human dignity is prohibited and there is an aim to ensure that all recipients of the Code of Conduct 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 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 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, physical appearance or any other feature of each individual, also including the expression of one's own thought). The Diversity, Equity & Inclusion (DE&I) Principles were updated in 2023 (previously Diversity and Inclusion), and the new version was approved by the Board of Directors. The updated principles state the Group's non-tolerance of discrimination, the Group's commitment to training and raising awareness on DE&I issues, the focus on the inclusion commitment towards same-sex couples that was previously set forth in another internal regulatory document (the commitment to guarantee, as part of company regulation, the same provisions to unions between individuals of the same gender as for unions between individuals of different genders), and the Group's greater attention to the use of increasingly inclusive and respectful language.

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 2023, the Board of Directors of Intesa Sanpaolo approved the updated Group Anti-Corruption Guidelines. The updated Anti-Corruption Guidelines include refinements to the process through which the areas at greatest risk are identified and the inclusion of a specific reference to the provisions of the ISO 37001 standard regarding the need to acquire periodic declarations of commitment to compliance with the Guidelines by the members of the Board of Directors (of Intesa Sanpaolo S.p.A.) and the Top Managers¹⁵ of Intesa Sanpaolo. The anti-corruption due diligence procedures 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 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 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

¹⁵ For this purpose, Top Managers are the managers reporting directly to the CEO and the President of Intesa Sanpaolo S.p.A.

and social and environmental opportunities. The Group Purchasing 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.

Purchasing Rules

The Purchasing Rules define the reference principles that must guide the sourcing process in the different phases, 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.

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.

Rules on ESG & Reputational Risk Clearing

In line with the strategic guidelines, ESG and reputational risks are also managed through the ESG & Reputational Clearing process. The information used for the ESG & Reputational Risk Clearing activity is based on the counterparties' disclosures and selected ESG external providers. Intesa Sanpaolo, Intesa Sanpaolo Bank Luxembourg S.A, Intesa Sanpaolo Bank Ireland Plc and Banka Intesa Sanpaolo d.d. are the reporting entities included in the scope of the clearing process. This process aims to:

- identify and assess ex-ante potential ESG risks, including social factors such as policies to improve the working environment, labor relations, focus on non-discrimination and the promotion of diversity, labor 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/third parties and extraordinary transactions 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 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.

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.

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 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.

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 him 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 2023, 30 reports were received on the Parent Company's Ordinary Channel, of which 1 was judged not pertinent, whereas 29 resulted in the launch of specific investigations. Dedicated whistleblowing channels are also active at the Group's International Subsidiary Banks, which received 8 reports, 4 of which were judged not pertinent. Overall, there were no reports regarding modern slavery in 2023 in the Group.

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

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 also created a set of rules for the oil & gas sector¹⁶, coal sector¹⁷ and armaments sector.

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.

¹⁶ The Rules on oil&gas sector were issued by Intesa Sanpaolo in 2021, updated in 2024 and their adoption is ongoing for: Fideuram Asset Management (Ireland) DAC, Intesa Sanpaolo Assicura S.p.A., Intesa Sanpaolo Bank Luxembourg S.A., Intesa Sanpaolo Bank Ireland Plc and Banka Intesa Sanpaolo d.d.

¹⁷ The Rules for lending operations in the coal sector were issued by Intesa Sanpaolo in 2020 and were adopted by Intesa Sanpaolo Bank Luxembourg S.A., Intesa Sanpaolo Bank Ireland Plc and Banka Intesa Sanpaolo d.d.

5.2 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. For qualified and monitored suppliers, we operate controls on multiple sources inside the Group and outside, both on the direct supplier and on the related subjects (actual owners of the company and top managers). Our Purchasing Department is also made aware of any prejudice regarding the suppliers managed. Suppliers with whom we no longer want to engage are registered on a black list. From the point of view of contractual protection, there are both general contractual standards (General Conditions) and category-specific (Special Conditions), which require the fullest respect for workers' rights;
- (b) steers suppliers and sub-suppliers' policies towards respecting human rights, labour rights and environmental protection.

Most of Intesa Sanpaolo's and Intesa Sanpaolo Assicura S.p.A.'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. Suppliers qualified by the Purchasing Head Office Department are assigned a global score that determines whether or not, and how, we may engage with them. This score is calculated using an algorithm that takes into account different sources, including the compilation of ESG and Reputational Risk questionnaires. For example, in the case of labour-intensive activities, if the supplier does not accept the particular conditions of supply or does not pay social security and welfare contributions, he is not qualified and will not be allowed to be engaged as a supplier of the Group. 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 may be conducted by internal staff.

5.3 Contractual arrangements with suppliers

Intesa Sanpaolo Group 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. 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 supplier would have their Supplier Gate score reduced, potentially falling into the category of suppliers the Group cannot engage. For certain categories of expenditure (e.g. cleaning services) the contract with the contractor 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 international standard, with a specific focus on human rights issues. The 2023 certification reflected 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 Department for Equal Opportunities of the Presidency of the Council of Ministers as part of the commitment to gender equality enshrined in the NRRP to produce sustainable and lasting change in corporate gender policies by adopting specific KPIs.

(c) Occupational Health and Safety

Since 2017¹⁸ 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.

(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

¹⁸ In 2023 Intesa Sanpaolo renewed the compliance certification of its Occupational Health and Safety Management System with the UNI ISO 45001:2018 standard.

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. In 2023, the first of the two maintenance audits for the purpose of maintaining the certification was completed, with the involvement of numerous Group structures.

(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 supplier cannot register if he does not confirm that he has acknowledged the documents mentioned, which are made available on the 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 2023 to 31 December 2023.

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 2023 the Group disbursed new loans for about 5.5 billion euro¹⁹, equal to 9.1% 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 can be found in our 2023 Consolidated Non-financial Statement [\[1\]](#).

¹⁹ 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 2023 Consolidated Non-financial Statement [\[1\]](#).

9. Board Approval

- (a) This statement has been approved by the Board of Directors of Intesa Sanpaolo, on 11th June 2024, 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



- (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:

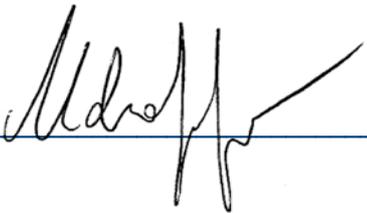
- (i) Fideuram Asset Management (Ireland) DAC

Matteo Cattaneo – CEO and Managing Director



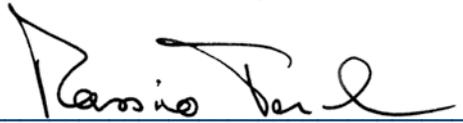
- (ii) Intesa Sanpaolo Assicura S.p.A.

Alessandro Scarfò – General Manager and CEO



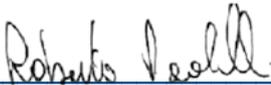
- (iii) Intesa Sanpaolo Bank Luxembourg S.A.

Massimo Torchiana – Managing Director and CEO



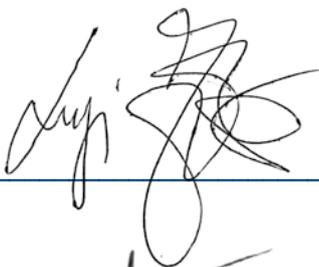
- (iv) Intesa Sanpaolo Bank Ireland Plc

Roberto Paolelli – Managing Director



- (v) Banka Intesa Sanpaolo d.d.

Luigi Fuzio – President of the Management Board



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

Marc Flammang – CEO

