



# Procedure for managing reports of misconduct - Whistleblowing

## Whistleblowing

**ABC, L.D. 231/01, WB & COI Advisory**

Milan, 28/07/2023

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Together. |  **UniCredit**

# Agenda

This document provides information on the channels, procedures and requirements for making reports internally as well as the channels, procedures and requirements for making external Whistleblowing reports

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**UniCredit channels for making reports**

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**External channels, requirements and procedures for managing external reports**





# UniCredit channels for making reports





Illegitimate behavior can be reported to a dedicated Compliance structure entitled to review the report through a structured process.

The report can be sent using any of the following methods of your choice:

- dedicated email address;
- telephone line, through which it is possible to record, also anonymously, one's message in a voicemail box;
- dedicated web platform through which you can enter, also anonymously, a text message;
- in paper form to be transmitted to a dedicated physical address;
- orally by telephoning a dedicated contact person, requesting an individual meeting in person.



All reports, both oral and written, are managed with the utmost care.

UniCredit ensures confidentiality, privacy and data protection and guarantees the protection of the whistleblower from any direct or indirect retaliation related to the report made.

Useful details on using the Whistleblowing channels made available by UniCredit are provided in the following slides.





## Employees of UniCredit S.p.A.

[SpeakUP Servizio WEB](#)

Access code: 67046

Phone line: 800-787639

## Not Employees

[SpeakUP Servizio WEB](#)

Access code: 09694

Phone line: 800-787639



## Address for paper, oral, or telephone reports or to request an individual meeting in person

Head of ABC, L.D. 231/01, WB & COI Advisory

Piazza Gae Aulenti 3 - Tower A, 9° floor

20154 Milano

Phone: +39 348-1481214



## Address for e-mail reports

[UIWHISTBLO-Italia@unicredit.eu](mailto:UIWHISTBLO-Italia@unicredit.eu)



# UniCredit S.p.A. - Foreign branches

## SpeakUp Web and Phone Telefono

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Country	Phone Service	Web Service General URL: <a href="http://www.speakupfeedback.eu/web/t8h5gj">www.speakupfeedback.eu/web/t8h5gj</a>	Access code	Language Option 1	Language Option 2
Austria	0800 - 295175	<a href="http://www.speakupfeedback.eu/web/t8h5gj/at">www.speakupfeedback.eu/web/t8h5gj/at</a>	15495	German	English
Czech Republic	800 - 900538	<a href="http://www.speakupfeedback.eu/web/t8h5gj/cz">www.speakupfeedback.eu/web/t8h5gj/cz</a>	98437	Czech	English
France	0800 - 908810	<a href="http://www.speakupfeedback.eu/web/t8h5gj/fr">www.speakupfeedback.eu/web/t8h5gj/fr</a>	58237	French	English
Germany	0800 - 1801733	<a href="http://www.speakupfeedback.eu/web/t8h5gj/de">www.speakupfeedback.eu/web/t8h5gj/de</a>	03018	German	English
Hungary	0680981359	<a href="http://www.speakupfeedback.eu/web/t8h5gj/hu">www.speakupfeedback.eu/web/t8h5gj/hu</a>	98437	Hungarian	English
India	0008004401221	<a href="http://www.speakupfeedback.eu/web/t8h5gj/in">www.speakupfeedback.eu/web/t8h5gj/in</a>	28217	English	Italian
Poland	008004411739	<a href="http://www.speakupfeedback.eu/web/t8h5gj/pl">www.speakupfeedback.eu/web/t8h5gj/pl</a>	98437	Polish	English
Romania	0800894540	<a href="http://www.speakupfeedback.eu/web/t8h5gj/ro">www.speakupfeedback.eu/web/t8h5gj/ro</a>	98437	Romanian	English
Slovakia	0800004529	<a href="http://www.speakupfeedback.eu/web/t8h5gj/sk">www.speakupfeedback.eu/web/t8h5gj/sk</a>	98437	Slovak	English
Spain	900 - 973174	<a href="http://www.speakupfeedback.eu/web/t8h5gj/es">www.speakupfeedback.eu/web/t8h5gj/es</a>	57473	English	Italian
United Kingdom	0800 - 1693502	<a href="http://www.speakupfeedback.eu/web/t8h5gj/gb">www.speakupfeedback.eu/web/t8h5gj/gb</a>	76934	English	Italian
United States	1-866-2506706	<a href="http://www.speakupfeedback.eu/web/t8h5gj/us">www.speakupfeedback.eu/web/t8h5gj/us</a>	20737	US English	Italian

**i** **China** - If you are calling with provider Unicom: 108007440179. If you are calling with provider Telecom (landline only): 108  
**Web Service:** [www.speakupfeedback.eu/web/t8h5gj/cn](http://www.speakupfeedback.eu/web/t8h5gj/cn) - **Access code:** 01747 - **Language Option 1:** Mandarin Simplified - **Language Option 2:** English





## UniCredit S.p.A. employees

[SpeakUP Servizio WEB](#)

Access code: 76934

Phone line: 08001693502



## Address for paper, oral, or telephone reports or to request an individual meeting in person

UniCredit HR Department or Att. MLRO

UniCredit Bank

Moor House, 120 London Wall,  
London, EC2Y 5ET

Phone MLRO: +44 (0) 207 826 1104



## Address for e-mail reports

[Jansen.versfeld2@unicredit.eu](mailto:Jansen.versfeld2@unicredit.eu)





## Requirements and procedures for managing reports





When any of the persons addressed by the regulations on reporting unlawful conduct believe that one has occurred, or may occur, or as soon as they become aware of it, they may make a report.

Unacceptable Conducts refer to any action and/or omission in a work-related context or impacting it, that is or could be harmful to or jeopardize the Group and/or its Employees, including conduct that is:

- illegal, unfair or unethical;
- a breach of laws and regulations; or
- a failure to comply with internal rules.



Alleged illegitimate behavior referring to topics covered under Group Policies (including Global Policy on Code of Conduct and anti-harassment, sexually inappropriate behavior, bullying, and retaliatory acts) may be reported, including but not limited to:

- Bribery and corruption;
- Money Laundering;
- Violation of Financial Sanctions regulations;
- Violation of antitrust laws;
- Insider trading and/or market manipulation;
- Harassment;
- Bullying;
- Fraud;
- Misuse of confidential customer and Company data;
- Violation of the Code of Ethics and/or Code of Conduct;
- Violations of the Organization and Management Model pursuant to Legislative Decree 231/01.



# Procedure for managing reports

## Main points

1 2 3



### How the procedure works



Secure channels to report, including anonymously, illegitimate behavior



Personal data is managed confidentially



Whistleblower receives feedback on receipt and feedback on the investigation



Absence of retaliation or discrimination against the Whistleblower



### Main actors involved



**Compliance is the Process Owner:** all reports, anonymous or signed, even those received from Branch Managers or other Functions, outside WB channels, must be sent confidentially to ABC, L.D. 231/01, WB & COI Advisory

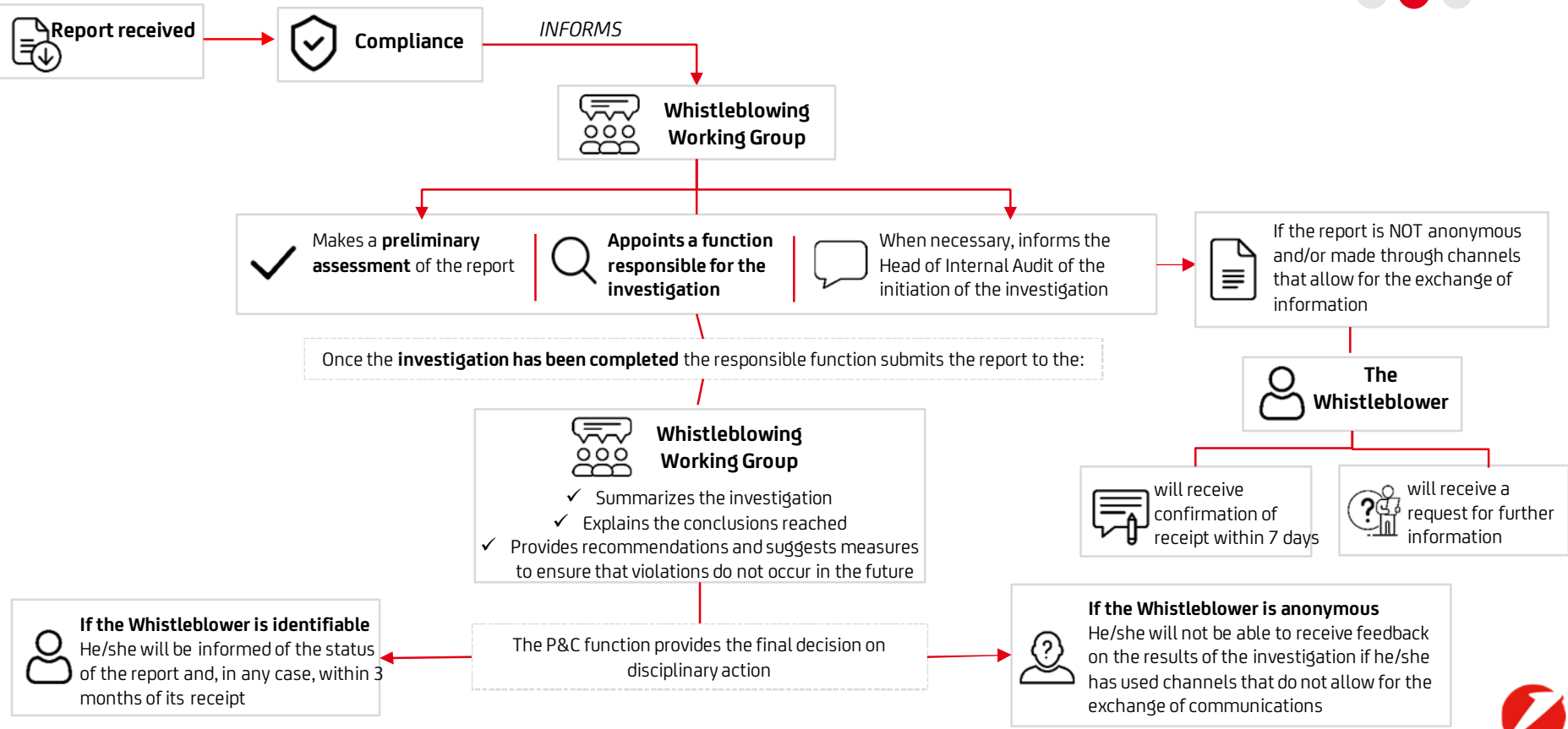


The assessment of each WB in UniCredit S.p.A. is carried out by the Whistleblowing Working Group, composed of two different functions, which also identifies the investigating function



# Procedura di gestione delle segnalazioni in sintesi

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## **External channels, requirements and procedures for managing external reports**



# External channels to report

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In implementation of Legislative Decree 24/23, **the National Anti Corruption Authority (ANAC) has been identified as the authority responsible for receiving and managing external reports, including through an IT platform that collects reports made, also anonymously.** The Reporting Person may make an external report to ANAC if, at the time of its presentation, one of the following conditions is satisfied:

- there is no provision within his or her work context for the mandatory activation of the internal reporting channel, or this channel, even if mandatory, is not active or, even if activated, does not comply with the provisions of the law;
- has already made an internal report and it has not been followed up;
- has reasonable grounds to believe that, if it were to make an internal report, it would not be effectively followed up or that the same report could lead to a risk of retaliation;
- has reasonable grounds to believe that the violation may constitute an imminent or evident danger to the public interest.

In addition, the Whistleblower may also contact ANAC to notify any retaliatory acts resulting from a report.

External reporting is acquired by ANAC through the channels it provides: IT platform, oral reports, and face-to-face meetings set within a reasonable period of time. For more information on what can be reported and how to make a report to ANAC, please refer to the guidance provided by that Authority, which can be found in a dedicated section of its website.



The Whistleblower may directly make a public disclosure when:

- has previously made an internal and external report or has directly made an external report and has not been responded to within the prescribed time limit regarding the measures planned or taken to follow up on the reports;
- has reasonable grounds to believe that the violation may constitute an imminent or evident danger to the public interest;
- has reasonable grounds to believe that the external report may carry the risk of retaliation or may not be effectively followed up because of the specific circumstances of the particular case, such as those where evidence may be hidden or destroyed or where there is a well-founded fear that the person who received the report may be in collusion with or involved in the offender.

