

# UniCredit Statement on Modern Slavery Act and Human Trafficking

2017

This statement is published in accordance with section 54 of the United Kingdom's Modern Slavery Act 2015, which addresses the issues of modern slavery and human trafficking. It was approved by UniCredit Board of Directors and applies to all companies within the Group that are required to have a modern slavery statement.<sup>1</sup>

The statement describes the measures taken by UniCredit to mitigate the risk of slavery and human trafficking, within our businesses or our supply chain for the financial year ended 31 December 2017.

## About us

UniCredit is a pan-European commercial bank with a fully plugged in Corporate & Investment Banking, delivering its unique Western Central and Eastern European network to its extensive 25 million client franchise. UniCredit offers local expertise as well as international reach and accompanies and supports its clients globally, providing them with unparalleled access to leading banks in its 14 core markets as well as an another 18 countries worldwide.

UniCredit has a significant, long-established presence in United Kingdom since 1972, where we offer a wide range of Corporate and Investment Banking services focusing on the unique strengths of UniCredit across Western, Central and Eastern Europe.

## Our Commitment

We are committed to contrast the risk of modern slavery or human trafficking in our business or in our supply chains. We operate in accordance with the Universal Declaration of Human Rights and we are signatory to the UN Global Compact, which encourages to conduct business in a responsible manner by following common principles in the field of human rights, labour, the environment and anti-corruption.

We adopted international declarations and conventions, including but not limited to:

- the International Labour Organization's (ILO) Fundamental Human Rights Conventions;
- the International Covenant on Economic, Social and Cultural Rights;
- the Guiding Principles on Business and Human Rights;
- the United Nations Environment Programme Finance Initiative (UNEP FI) Statement of Commitment by Financial Institutions on Sustainable Development.

In addition to these public conventions, we have specific policies in place which contribute to manage human rights topics such as the [Integrity Charter](#), the [Code of Conduct](#), the [Anti-Bribery and Anti-Corruption Policy](#), the [Whistleblowing Policy](#) and the Anti-Money Laundering (AML) and Countering of Terrorist Financing (CTF) Policy.

Our [Human Rights Commitment](#) reflects our ethics and values, providing guidance on the way we treat our employees, work with our customers, suppliers and contribute to the communities in which we operate. It represents the guidance for our practices involving human rights.

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<sup>1</sup> UniCredit SpA, UniCredit Bank AG, UniCredit Services ScpA.

## Our employees

UniCredit does not use child labour or forced labour in its own business practices, and is in full compliance with the International Labour Organization's (ILO) Tripartite Declaration of Principles Concerning Multinational Enterprises and Social Policy or, when more rigorous, with current labour laws in each country where UniCredit operates.

UniCredit is committed to select, hire and manage employees while respecting their dignity and rights as individuals. The principles of civil freedom (e.g., religious, political and cultural freedom, freedom of union and freedom of sexual orientation) must always be respected.

UniCredit aims at providing a culture where individuals are free to voice dissent and not to be wary to reconsider their views, overcoming hierarchical and bureaucratic conditioning.

UniCredit is committed to respecting and enforcing sovereign state legislation on collective agreements, bargaining and freedom of association. The UniCredit European Works Council (UEWC)<sup>2</sup>, an enabler of social dialogue, is a tangible example of our attitude of moving beyond local requirements towards guaranteeing that employees' right to information and consultation is uniform throughout the Group. Over the past 10 years, UniCredit and the UEWC have achieved important results, defining a distinctive global approach to industrial relations. The [Joint Declaration on Equal Opportunities and Non-Discrimination](#), signed in 2009, is intended to be a point of reference for all employees to define the guidelines on sensitive issues such as diversity, equal opportunities and non-discrimination, with the purpose of creating a diverse corporate culture, improving the sense of belonging and enhancing the quality of life at work. Since 2013, we have also adopted a Global Policy on Gender Equality.

In November 2017, as a first example for the European banking sector, UniCredit and the UEWC signed a [Joint Declaration on Work-Life Balance](#) aimed at promoting a set of specific, concrete actions to support work-life balance across the bank. It establishes a basis for concrete implementation in all countries, in keeping with the respective national legal requirements and labor conditions. More information can be found on our [2017 Integrated Report – Human Capital Chapter](#).

In order to guarantee well-being at work it is fundamental for us to manage the health and safety of our employees. For this reason, we have launched numerous initiatives while ensuring full compliance with all applicable laws. These include:

- adequate evaluation of risks (e.g., analysis and verification of staff work activities, including the nature of the job, the instruments for performing the job, work spaces, individual and collective protection measures, technical infrastructure and contractual matters – both for internal and contracted positions);
- fulfillment of a higher level of wellness at work through dedicated initiatives, workshops and training courses.

In 2017 we updated our [Code of Conduct](#) aimed at ensuring we all behave appropriately with respect to colleagues, clients and other third parties in our daily activities. The principles of the Code underscore the legal and ethical standards to which we must adhere in order to run our business successfully while at the same time protecting our clients' interests, mitigating risk, complying with financial regulations, assuring market transparency and safeguarding confidential data.

In addition, the bank's whistleblowing process provides employees with a way to report conduct that violates the law or the bank's internal rules. The bank's approach to whistleblowing is set out in our [Whistleblowing Policy](#) which is intended to grant a corporate environment where employees may feel free to make reports on unacceptable conduct. The management of this process is designed to ensure the greatest possible confidentiality of the identity of the whistleblower and of the accused individual and to prevent any possible retaliatory or discriminatory behavior in response to the report. With specific focus to 2017, we launched a new whistleblowing campaign in order to strengthen the corporate culture based on ethical behavior and good corporate governance.

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<sup>2</sup> UniCredit EWC Founded in 2007, (UEWC) is an international body composed by the Employees' Representatives of all the European Countries where the Group is present.

In the context of the work aimed at ensuring compliance with the Italian rules on non-financial disclosure (Legislative Decree 254/2016, implementing EU Directive 2014/95), during 2017 we analyzed the bank's whole perimeter with a risk-based approach under the sponsorship of the CEO. A specific desk analysis combined with an assessment of the main socio-environmental risks including human rights was conducted and led us to the definition of the perimeter of Group companies to be included in the Consolidated Non-Financial statement.

## Our customers

UniCredit is aware that every economic and business activity can generate potential impacts, both positive and negative, on human rights. UniCredit is committed to promoting sustainable solutions in its financing and investment decisions and has adopted an integrated, multifaceted approach to managing the social and environmental risks, including human rights, associated with its financial products and services.

Human rights aspects are managed through several policies and practices such as:

- the Reputational Risk Special Policies (e.g., Defence/Armaments Industry Policy, and Water Infrastructure -Dam);
- the Compliance Policies (e.g. Anti-Money laundering and Countering of Terrorist Financing).

UniCredit environmental, social and reputational risk policies define internal processes to consistently identify, assess and monitor potential environmental and social risks. UniCredit implemented and integrated the Equator Principles (EP), when applicable, into the financing of projects. EP are an internationally recognized framework for environmental and social due diligence, which utilize International Finance Corporation (IFC) Performance Standards on issues including child and forced labour practices, as well as Social Sustainability and the World Bank Group Environmental, Health and Safety (EHS) Guidelines. EP consider human rights as one of the central themes of the forthcoming update of the framework. Indeed, following 2017 EP Annual General Meeting, work began on redefinition of the framework.

At a transaction level, bearer of single approval competence and members of credit committees have to bear in mind and evaluate, among others, potential risks and violations of human rights (e.g., corruption, forced labor, ethnic and religious conflicts, human development, etc.) based on available information and taking into consideration the country risks analysis.

UniCredit is committed to the fight against money laundering, including terrorist financing and active management of legal, regulatory and reputational risks across the bank through the implementation of a risk-based Anti-Corruption (ABC) and Anti-Money Laundering (AML) program and mechanisms for monitoring the effectiveness of the bank's approach. Such programs are particularly relevant due to the fact that modern slavery offences are often linked to money laundering and other financial crimes. In this respect, in 2017 we updated our Group policy on Anti-Money Laundering and Countering of Terrorist Financing and we reviewed our Group policy on Anti-Bribery and Corruption and related standard procedures to update them to international best practices.

Furthermore, another important declaration with the UEWC, [the Joint Declaration on Responsible Sales \(May 2015\)](#), promotes joint principles and guidelines in UniCredit commercial approach based on four pillars (Quality of products, Customer centricity, Employees professional development, Organizational Governance). This approach helps employees in having a responsible approach to sales, ensuring a medium – long term horizons for customers.

More information can be found on our [2017 Integrated Report](#).

## Our suppliers

In UniCredit suppliers and contractors must meet certain minimum requirements and are subject to appropriate review and assessment, before being engaged and on an ongoing basis. This is done in order to mitigate corruption risk and comply with our Group Policy applicable to the supply chain, which expresses - among others - our commitment to properly managing, and preventing the worst environmental impacts associated with our activities such as consumption of natural resources and production of waste.

Moreover, we examine whether suppliers, service providers and supplied products comply with our compulsory minimum requirements. These requirements represent the basis of our cooperation. Such requirements request our suppliers to provide information regarding environmental and social /labor law issues, by filling in questionnaires related to the respect of fundamental human rights, prevention of child labor, freedom of association, working conditions, equal pay, health, safety and business ethics and, if necessary, by submitting relevant documents.

Our targets are to increase awareness of suppliers / service providers for social, labor-law and environmental issues.

## **Training and awareness**

During the year we launched several initiatives to spread awareness on topics such as the new Code of Conduct for UniCredit employees, including a Group wide communication campaign for all colleagues and a dedicated brochure. To further raise knowledge and understanding of it, the bank organized specific events for senior managers recalling its principles, the bank's expectations, and responsibilities of each individual UniCredit employee.

Specific training on human rights has been provided, as well as learning modules have been run on such topics as Anti-Money Laundering, Anti-Bribery and Corruption and Whistleblowing, which are mandatory for all employees. Moreover, during the year a new Code of Conduct course has been launched, assigned to all bank employees. The course is based on the new Code of Conduct and recalls all the principles and behaviors to which all employees and partners of UniCredit must comply with, in order to ensure the highest standards of professional conduct and integrity related to their activity in – or on behalf of – UniCredit. Also training on EP and our sectorial policies took place.

This statement will be reviewed and updated annually.

**Jean Pierre Mustier**  
Chief Executive Officer  
UniCredit SpA

