

GRI and Global Compact Index

All core GRI indicators are represented in the following table, with additional indicators included only if they are referenced within the report. For the GRI Content Index, please see the dedicated area of UniCredit's corporate website (www.unicreditgroup.eu).

KPMG reviewed the 2011 Sustainability Report, which satisfies GRI requirements at an A+ application level.

Legend:

Total	Indicator completely covered
N/A	Not applicable
NM	Not material
C	Core indicators
A	Additional indicators

Indicator	Coverage	Page
PROFILE		
1. Strategy and analysis		
1.1	Statement of the most senior decision-maker of the organization	Total 4-5
1.2	Main impacts, risks, and opportunities	Total 11, 16-21, 23, 35, 57, 61, 77
2. Organization profile		
2.1	Organization name	Total Front cover
2.2	Main brands, products and/or services	Total 2011 Consolidated Reports and Accounts: Results By Business Segment
2.3	Operational structure of the organization	Total 6-7
2.4	Headquarters	Total 92
2.5	Countries of operations	Total 6-7
2.6	Ownership structure and type of legal entity	Total 59; 2011 Consolidated Reports and Accounts: Corporate Governance – Major Shareholders; 2011 Report on Corporate Governance and Ownership Structure: 5-10, 73-76
2.7	Markets served	Total 6-7
2.8	Scale of the organization	Total 6-7
2.9	Significant changes	Total No significant changes
2.10	Awards received	Total 33, 41, Supplement: 36
3. Report parameters		
Profile		
3.1	Reporting period	Total 2
3.2	Previous report's date of publication	Total 2
3.3	Reporting frequency	Total 2
3.4	Contact point for information on report	Total Inside back cover
Report purpose and scope		
3.5	Process for defining contents	Total 2, 20-21
3.6	Report scope	Total 2
3.7	Limitations of report purpose or scope	Total 2
3.8	Information on other associate companies	Total No significant changes
3.9	Data measurement techniques and basis of calculation	Total 2
3.10	Modifications compared with previous report	Total 2
3.11	Significant changes compared with previous report	Total No significant changes related to reporting scope and boundary. Changes in measurement methods are clearly stated within the Sustainability Report
Index of GRI contents		
3.12	Table of reference	Total 86-88; GRI Content Index
Assurance		
3.13	External assurance	Total 2, 90-91; 2011 Report on Corporate Governance and Ownership Structure: 56
4. Governance, Commitment, Involvement		
Governance		
4.1	Governance structure	Total Supplement: 2-3; 2011 Report on Corporate Governance and Ownership Structure: 17-18, 34, 77-80; http://www.unicreditgroup.eu/en/Governance/Board_of_Directors.htm
4.2	Indicate whether Chairman also holds an executive role	Total 2011 Report on Corporate Governance and Ownership Structure: 77

Indicator	Coverage	Page
4.3	Independent and/or non-executive directors	Total 2011 Report on Corporate Governance and Ownership Structure: 77-80
4.4	Mechanisms for making recommendations to Board of Directors	Total 25, 58, Supplement: 3, 19; 2011 Report on Corporate Governance and Ownership Structure: 68-70
4.5	Link between directors' remuneration and performance	Total 15, Supplement: 4; 2011 Report on Corporate Governance and Ownership Structure: 39-40; UniCredit S.p.A. Financial Statements 2011: Notes to the Accounts, Part H.1
4.6	Mechanism of conflicts of interest's avoidance	Total Supplement: 10; 2011 Report on Corporate Governance and Ownership Structure: 20-22
4.7	Directors' qualifications	Total 2011 Report on Corporate Governance and Ownership Structure: 17-21, 36-38
4.8	Mission, values, codes of conduct, and principles	Total 14, 31, Supplement: 2; Mission; Integrity Charter
4.9	Procedures to identify and manage economic, environmental, and social performance	Total 16-18, Supplement: 6; 2011 Report on Corporate Governance and Ownership Structure: 41-45
4.10	Process to assess BoD's performance	Total Supplement: 4; 2011 Report on Corporate Governance and Ownership Structure: 24
Commitment in external initiatives		
4.11	Way in which prudential principle or approach is applied	Total 13-14, 16-18 Supplement: 10; 2011 Report on Corporate Governance and Ownership Structure: 43-45
4.12	Adoption of external codes and standards in the economic, social, and environmental fields	Total 5, 17, 53
4.13	Memberships in associations	Total Supplement: 40
Stakeholder Engagement		
4.14	List of stakeholders engaged	Total 19-20
4.15	Principles for stakeholders' identification and selection	Total 19-20
4.16	Stakeholder engagement activities	Total 19-20
4.17	Key aspects and criticalities emerging from stakeholder engagement and related actions	Total 24-25, 36-39
FINANCIAL SERVICES SECTOR SUPPLEMENT INDICATORS		
C FS1	Policies with specific environmental and social components applied to business lines	Total 53- 55
C FS2	Procedures for assessing and screening environmental and social risks	Total 18, 55
C FS3	Monitoring clients' implementation of and compliance with environmental and social requirements	Total 53-54
C FS4	Improvement of staff competency to implement the environmental and social policies and procedures	Total 53
C FS5	Interactions with clients/investees/business partners regarding environmental and social risks and opportunities	Total 42-43, 54, 80-81
C FS6	Company portfolio	Total Supplement: 32-33; 2011 Consolidated Reports and Accounts: Report on Operations - Results by Business Segment - Breakdown by business, geographic area and company
C FS7	Products and services designed to deliver a specific social benefit	Total 52, 68-70
C FS8	Products and services designed to deliver a specific environmental benefit	Total 81-82
C FS9	Audits on implementation of environmental and social policies and risk assessment procedures	Total 54; The Audit Department's onsite activities verify the endorsement of UniCredit policies at the local level, ensuring that their implementation is effective and adheres to local regulation. Analysis of the credit process is generally conducted through a sampling procedure, and for cases in which this sampling includes operations related to special credit policies – such as the Nuclear or Defense Sector Policies – the audit also verifies the compliance with the relevant internal regulations. There is no specific reporting regarding assessments on these matters; findings are included within the reports of the particular operation
C FS10	Portfolio's companies engaged on environmental or social issues	Total 54, 80
C FS11	Assets subjects to environmental or social screening	Total Supplement: 34
C FS12	Environmental or social voting policies	Total Supplement: 34
ECONOMIC PERFORMANCE		
DMA EC	Information on management approach	Total 2011 Consolidated Reports and Accounts: Report on Operations - Group Results - Main Results and Performance for the period
C EC 1	Direct economic value generated and distributed	Total Supplement: 44
C EC 2	Financial implications and other risks and opportunities due to climate change	Total 79-83
C EC 3	Coverage of the organization's defined benefit plan obligations	Total Supplement: 22-23; 2011 Consolidated Reports and Accounts: Part B - liabilities, sections 10-11-12
C EC 4	Significant financing received from Public Administration	Total 59, Supplement: 18
C EC 6	Policy, practices, and percentage of expenditure concentrated on local suppliers	Total 83

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Indicator	Coverage	Page
C EC 7	Procedures for local hiring	Total In 9 out of the 10 countries where UniCredit is present (Italy, Germany, Austria, Poland, Bulgaria, Croatia, Czech Republic, Hungary, Romania and Russia), the majority of Board of Directors members are local
C EC 8	Development and impact of investments in infrastructures and public utilities	Total 62-63, 65
A EC 9	Significant indirect economic impacts	Total 49, 52-53, 62, 65
ENVIRONMENTAL PERFORMANCE		
DMA EN	Information on management approach	Total 77-81
C EN 1	Raw materials used	Total 85
C EN 2	Percentage of materials coming from waste recycling operations	Total 85
C EN 3	Direct energy consumption by source	Total 84
C EN 4	Indirect energy consumption by source	Total 84
A EN 5	Energy saving	Total 79-80
A EN 6	Initiatives to provide energy-efficient or renewable energy based products and services	Total 81-83
A EN 7	Initiatives to reduce indirect energy consumption and reductions achieved	Total 78-81
C EN 8	Water consumption by source	Total 85
C EN 11	Land owned, rented or managed in protected areas	Total In Sicily, our Group owns five plots of land with environmental and archeological restrictions, totaling roughly 731,000 square meters
C EN 12	Description of greatest impacts on biodiversity	NM
C EN 16	Greenhouse gas emissions	Total 84
C EN 17	Other indirect greenhouse gas emissions	Total 84
A EN 18	Initiatives to reduce greenhouse gas emissions	Total 78-80; inside back cover
C EN 19	Emissions of substances harmful for the ozone layer	Total In line with applicable regulations, UniCredit continues to replace refrigeration and cooling systems that contain ozone-depleting substances
C EN 20	Other atmospheric emissions	NM
C EN 21	Water discharges	NM
C EN 22	Waste production and disposal methods	Total 85
C EN 23	Total number and volume of pollutant discharges	NM
C EN 26	Initiatives to mitigate impacts of products and services	Total 80-83
C EN 27	Reclaim rate of products sold	NA
C EN 28	Fines and penalties for non compliance with environmental law and regulations	Total No relevant fines were imposed in 2011 for non-compliance with environmental laws or regulations
A EN 29	Significant environmental impacts of transporting products, goods, materials and members of the workforce	Total 79-80, 84
LABOR PRACTICES AND DECENT WORK		
DMA LA	Information on management approach	Total 23-25, 30-31, Supplement: 19, 26
C LA 1	Breakdown of staff by type, contract, region and gender	Total Supplement: 14, 17
C LA 2	Total number and rate of new employee hires and employee turnover by age, gender, and region	Total Supplement: 16
A LA 3	Benefits provided to full-time employees and not to temporary or part-time employees	Total Supplement: 22
C LA 15	Return to work and retention rates after parental leave, by gender	Total GRI Content Index
C LA 4	Degree of coverage of collective labor contracts	Total Supplement: 20
C LA 5	Minimum period of notice for operational changes	Total Supplement: 20-21
A LA 6	Percentage of total workforce represented in formal health and safety committees	Total Supplement: 26
C LA 7	On-the-job accidents and illness	Total Supplement: 28
C LA 8	Programs for management of serious diseases	Total Supplement: 29
A LA 9	Health and safety topics covered by collective agreements with trade unions	Total Supplement: 27
C LA 10	Staff training	Total 30, Supplement: 18-19
A LA 11	Programs for skills management and lifelong learning	Total 30, Supplement: 25
A LA 12	Employees receiving regular performance reviews	Total 28
C LA 13	Breakdown of employees by gender and other diversity indicators	Total Supplement: 14-15, 18; 2011 Report on Corporate Governance and Ownership Structure: 77-79
C LA 14	Ratio between basic salary and remuneration of men and women	Total Supplement: 16-17
HUMAN RIGHTS		
DMA HR	Information on management approach	Total Supplement: 19; Integrity Charter; Human Rights Commitment
C HR 1	Operations with human-rights considerations	Total 53-54; Human Rights Commitment
C HR 2	Suppliers and other business partners assessed as regards respect of human rights	Total 83
C HR 3	Employee training on policies and procedures concerning aspects of human rights	Total 14-15, 83; Human Rights Commitment
C HR 4	Cases of discrimination	Total Supplement: 31
C HR 5	Risks for right to freedom of association and collective bargaining	Total 83; Human Rights Commitment
C HR 6	Risks for use of child labor	Total 83; Human Rights Commitment

Indicator	Coverage	Page	
C HR 7	Risks for use of forced labor	Total	83; Human Rights Commitment
C HR 10	Operations that have been subject to human rights reviews	Total	Human Rights Commitment; GRI Content Index
C HR 11	Grievances related to human rights	Total	Supplement: 31; Human Rights Commitment
IMPACTS ON SOCIETY			
DMA SO	Information on management approach	Total	61-63, Supplement: 6-7
C SO 1	Management of impacts on community	Total	18
C FS13	Access points in low-populated or economically disadvantaged areas	Total	Supplement: 38
C FS14	Access to financial services for disadvantaged people	Total	68-69, 75
C SO 9	Operations with impacts on local communities	NM	
C SO 10	Prevention and mitigation measures implemented in operations with impacts on local communities	NM	
C SO 2	Analysis for risks related to corruption	Total	Supplement: 7
C SO 3	Staff trained in the prevention of corruption	Total	14, Supplement: 19
C SO 4	Actions taken following cases of corruption	Total	Supplement: 7
C SO 5	Positions concerning public policy and lobbying	Total	12, 16, 43
A SO 7	Legal actions for anti-competitive behavior	Total	Supplement: 7-9; 2011 Consolidated Reports and Accounts: Part E, Section 4.B
C SO 8	Sanctions for non-compliance with laws or regulations	Total	Supplement: 7-9; 2011 Consolidated Reports and Accounts: Part E, Section 4.B
PRODUCT LIABILITY			
DMA PR	Information on management approach	Total	35-36, 40, 44, 47
C FS15	Policies for the fair design and sale of financial products and services	Total	40-41, Supplement: 10-11
C PR 1	Healthiness and safety of products and services	Total	Supplement: 35
C PR 3	Information on products and services	Total	40-41
A PR 4	Non-compliance with regulations concerning product and service information and labeling	Total	46, Supplement: 33
A PR 5	Customer satisfaction	Total	36-38
C FS16	Enhancement of financial literacy	Total	43, 71-72
C PR 6	Laws, standards, and voluntary codes concerning marketing communications	Total	41, Supplement: 11
A PR7	Non-compliance with regulations concerning marketing communications	Total	Supplement: 11
C PR 9	Sanctions for non-compliance with laws or regulations	Total	Supplement: 7-9; 2011 Consolidated Reports and Accounts: Part E, Section 4.B

Making the connections by GRI and Global Compact

Categories	Principles	GRI Indicators
Human Rights	Principle 1 - Businesses should support and respect the protection of internationally proclaimed human rights.	LA4, LA 7-8, LA13-14, HR 1-2, HR 4-7, SO5, PR1
	Principle 2 - Businesses should make they are not complicit in human rights abuses.	HR 1-2, HR 4-7, SO5
Labour	Principle 3 - Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.	LA 4-5, HR 1-2, HR5, SO5
	Principle 4 - Businesses should uphold the elimination of all forms of forced and compulsory labour.	HR 1-2, HR7, SO5
	Principle 5 - Businesses should uphold the effective abolition of child labour.	HR 1-2, HR6, SO5
	Principle 6 - Businesses should uphold the elimination of discrimination in respect of employment and occupation.	EC7, LA2, LA 13-14, HR 1-2, HR4, SO5
Environment	Principle 7 - Businesses should support a precautionary approach to environmental challenges.	EC2, EN26, EN30, SO5
	Principle 8 - Businesses should undertake initiatives to promote greater environmental responsibility.	EN 1-4, EN8, EN 11-12, EN 16-17, EN21, EN26, EN28, SO5, PR3
	Principle 9 - Businesses should encourage the development and diffusion of environmentally friendly technologies.	EN2, EN26, SO5
Anti-corruption	Principle 10 - Businesses should work against corruption in all its forms, including extortion and bribery.	SO 2-5

Source of the correspondences between Global Compact principles and GRI indicators: report Making the Connections by GRI and Global Compact (www.globalreporting.org)