



## Global Policy against harassment, sexual misconduct, bullying and retaliation

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## **1 POLICY REQUIREMENT AND PURPOSE**

This Policy, inspired by the Universal Declaration of Human Rights, the Group's values and the Group Code of Conduct, sets out the expectations that UniCredit has of its Employees and its commitment to a serene, collegial and professional work environment devoid of any form of harassment, sexual misconduct, bullying and retaliation.

The intention of this Policy is the prevention, detection, enforcement, and on-going monitoring of harassment, bullying, sexual misconduct and retaliation, including by providing support for individuals who report (both Employees and Third Parties) and by protecting individuals who report applicable misconduct from retaliation.

This Policy reinforces the Group's commitment in the "Joint Declaration - Equal Opportunities and Non-Discrimination", signed by the members of the European Work Council and the Group's Human Resources Representatives to ensure a workplace requiring respect for the principle of equal treatment and equal dignity for all.

This Policy reflects Group's belief that any act of harassment, bullying, sexual misconduct or retaliation, threatens the dignity of the person subjected to it, potentially compromising their health, trust, morale, motivation to work, and work performance, the organisational climate and the Group's reputation. Harassment, sexual misconduct, bullying and retaliation are inconsistent with the above goals and this Policy and, therefore, will not be tolerated in any way. Employees must be aware that behaviors and words could be perceived and interpreted differently by each person; therefore, they have to pay attention.

## **2 APPLICABILITY AND SCOPE**

The Group respects - and Employees are required to respect - all applicable international, national, and local laws/regulations. There may be countries where Group's standards and requirements may exceed the requirements of that jurisdiction. There may also be behaviors UniCredit prohibits irrespective of whether or not these behaviors are prohibited by law. The Group will enforce the highest standards under this Policy irrespective of whether or not prohibited by law.

This Policy applies to behaviours internally and externally in all Legal Entities and to all Employees of the Group. The Policy applies to behaviors regardless of gender or level of seniority. The Policy applies both on-site in UniCredit offices and off-site, such as at clients' offices, events and travel locations, and is applicable in all work-related settings, including business trips, meetings, events, and social events related to the Group and Group business. Although the Group cannot control the conduct of Third Parties, the Group does not condone harassment, sexual misconduct, bullying or retaliation and will adopt appropriate consequence management measures in order to repress and avoid situations involving harassment, sexual misconduct or bullying that arise involving Third Parties. The Group will take appropriate steps to prevent any such misconducts and to ensure that the person reporting the misconduct is not adversely affected in terms of work assignments or other work-related activities as a consequence.

## **3 GENERAL COMMITMENT AND PRICIPLES**

In performing their daily work activities, all Employees must contribute toward creating and maintaining a respectful and harmonious work environment and eliminating intimidating, hostile, degrading, humiliating or offensive words and behaviors. Employees must contribute toward assuring respect for the rights, value and dignity of the person in all workplace relationships and

maintaining a work environment in which harassment, bullying, sexual misconduct and retaliation are considered unacceptable.

The Group does not tolerate any form of harassment, sexual misconduct, bullying and retaliation. believes respect for the rights and inviolability of all Employees throughout the Group is essential.

### **3.1 Harassment**

The Group, in promoting a work environment characterised by mutual respect and proper behaviour, prohibits any form of harassment carried out or attempted by an Employee.

This Policy prohibits any form of harassment based on actual or perceived sex; race; color; creed; religion or belief; sexual orientation or preference; gender identity or expression (including self-image, appearance or behavior) or gender reassignment; national origin; age; disability; marital status; domestic or civil partnership status; alienage or citizenship; ancestry (including ethnicity); military status; veteran status; genetic predisposition or carrier status; pregnancy and maternity; medical conditions also related to pregnancy or childbirth; status as a victim of domestic violence, sex offenses, or stalking; unemployment; or any other category protected by law in the local jurisdiction.

The term harassment means any unwelcome conduct or attempted unwelcome conduct, isolated or repeated, whether verbal, non-verbal, psychological, or physical, which is unacceptable, inappropriate or undesired, and which has the purpose or the effect of: interfering with an individual's work performance, living habits, or dignity, causing a state of fear or anxiety in the individual, causing fear or anxiety for the individual for their safety or the safety of others associated with the individual, affecting decisions regarding employment or professional development, or otherwise creating an intimidating, hostile, degrading, humiliating or offensive working environment, regardless of the identity of the intended target of the harassment.

### **3.2 Sexual Misconduct**

Sexual misconduct means any unwelcome behavior which has a sexual connotation or which is directed at an individual because of that individual's sex or gender (including pregnancy, childbirth and related medical conditions), gender identity or gender expression, and/or sexual orientation, or which offends the dignity of the individual, when submission to such unwelcome conduct is an explicit or implicit term or condition of employment, where submission to or rejection of such conduct becomes the basis for employment decisions affecting the individual, or such conduct has the purpose or effect of unreasonably interfering with the individual's work performance or creating an intimidating, hostile or offensive working environment.

Any implication that response to a sexual advance may be the basis for any employment-related decision is contrary to this Policy. The Group also explicitly prohibits any behaviour conditioning employment, remuneration, or career opportunity on any form of sexual or romantic activity.

### **3.3 Bullying**

Bullying is defined as repeated verbal abuse; verbal, non-verbal, or physical conduct of a threatening, intimidating or humiliating nature; or the sabotage or undermining of a person's work performance.

Bullying harms an individual's personal and professional dignity and contributes to a hostile work environment. Typical examples include both overt and insidious behaviour, including

provocations, oppressive conduct, marginalization, humiliation, insults, slander, physical and verbal aggression, ostracization, as well as conduct likely to create embarrassment.

### **3.4 Retaliation**

The Group is firmly committed to protecting any Employee who reports – in good faith – misconduct under this Policy from retaliation. Employees will be protected from retaliation from anyone (not just the alleged wrongdoer) and for as long as necessary. Therefore, the Group is committed to promoting an environment where Employees:

- i) feel comfortable engaging in open and honest communication;
- ii) are encouraged to speak up and to raise good faith concerns promptly regarding any situation that they may feel is unethical, fraudulent, or illegal, without fear of retaliation;
- iii) are encouraged to speak up even if they are not certain of, or do not have evidence of, their good faith concerns.

Retaliation is any adverse conduct taken because a person:

- reports any actual or perceived violation of Group regulation, laws or any other prohibited or inappropriate workplace behaviour; and/or
- expresses opposition to the type of conduct that would be a violation of Group regulation, laws or any other prohibited or inappropriate workplace behaviour; and/or
- participates in the reporting and investigation process set forth in Group regulation; and/or
- assists in an investigation or proceeding involving an actual or perceived violation of any Group regulation.

Retaliation may occur through conduct or written/oral communication and may take many forms, including any action that would keep an individual, also through incentives or other benefits, from reporting discrimination, harassment or retaliation, verbal or nonverbal behaviors, actual or implied threats, changes to the terms or conditions of employment, harassment, bullying, intimidation or deliberate exclusionary behaviors, shunning and/or avoiding an individual who reports discrimination, harassment or retaliation, or denying employment benefits because an Employee reported or encouraged another to report discrimination, harassment or retaliation or participated in the reporting and investigation process.

Retaliation may also include less obvious behaviors, such as excluding – in a voluntary and unjustified manner – Employees from important meetings or email chains, giving someone the “cold shoulder” in the office, not returning phone calls or emails in a voluntary and unjustified manner, gossiping about the Employee, or interfering with the Employee’s relationships with other Employees or Third Parties.

## **4 REPORTING PROCESS**

It is essential for the protection of people, of the work environment and of Group's reputation, that all Employees – both victims and witnesses – report acts of harassment, bullying, sexual misconduct and retaliation. Therefore, the Group emphasises the importance of reporting such behaviors, supporting the victims of such behaviors, and protecting those reporting (whether victims or bystanders) from all forms of retaliation.

If an act of harassment, bullying, sexual misconduct or retaliation occurs or is attempted, the Employee, in any case without prejudice to the possibility of having recourse to the competent authorities, should promptly report the matter, alternatively:

- through the channels outlined in the Whistleblowing procedure in force within the relevant Legal Entity;
- to the People & Culture Department of their Legal Entity;
- to their direct Line Manager or, in the case the latter is involved in the act, to the superior Manager, as identified based on the line of hierarchy, who will involve People & Culture Department of their Legal Entity; or
- through any other possible channels made available by the Legal Entity.

Upon becoming aware of any allegations of harassment, bullying, sexual misconduct or retaliation, the Group is committed to investigating promptly and to resolving in a fair manner claims of harassment, bullying and sexual misconduct. Any complaint or report will be kept in confidence to the extent possible, consistent with the Group's obligation to investigate the matter. Every effort will be made to handle such reports promptly and with discretion and confidentiality. Employees are required to cooperate in investigations conducted pursuant to this Policy.

## **5 PROTECTION MEASURES**

The Group is committed to promoting equal opportunities and to the global communication, implementation and enforcement of this Policy within the Group, including to Third Parties. Training is an essential element of implementing this Policy, including promoting awareness and prevention. In this regard, the Group undertakes to provide up to date, mandatory training on matters ruled by this Policy to all Employees which outlines procedures to follow and the potential consequences should misconduct occur. The Group also undertakes to provide the necessary assistance and support to any individuals who suffer misconduct in violation of this Policy.

## **6 DISCIPLINARY ACTIONS**

Any breach of the provisions contained in this Policy or any principle, value, obligation and law provision connected to such matter, may lead to disciplinary proceedings that may involve a proportionate disciplinary sanction, including the termination of employment for just cause. The Group is committed to implementing and continuously updating, the highest standards of organisational and management measures to prevent similar situations from occurring again.

## **7 REPORTING**

On annual basis, Legal Entities have to report cases under this Policy to their Governing Bodies. Each Legal Entity will send to UniCredit S.p.A. periodical report showing, on an anonymous basis, cases and trends of the reports received in the referring period as well as any training initiatives on matters ruled by this Policy.

## **8 ATTACHMENTS**

### **Definitions**

*Employees: all persons linked to UniCredit S.p.A. and to Legal Entities through an employment contract (including consultants and secondees) and all members of executive, strategic and control bodies.*

*Legal Entity: Legal Entity directly or indirectly controlled by UniCredit S.p.A.*

*Group: UniCredit Group, composed of UniCredit S.p.A. and Legal Entities.*

	<i>Third Parties: Individuals or legal entities connected to the Group through a formal agreement, such as clients, supplier, tied agents, ect..</i>
<b>Associated Policies</b>	<i>Global Policy – Whistleblowing UC-2013069 – Ods 511/2 Global Policy – Code of Conduct UC-2017-055- Ods 1187</i>
<b>Revised / replaced Policies</b>	<i>Global Policy against harassment, sexual misconduct and bullying UC - 2019-095 – Ods 1499 (minor change) Global Policy – Anti-Retaliation UC-2019-096 - Ods 1500 (minor change)</i>