

# **FINECOBANK**

Italian Sustainability Week 2023 Borsa Italiana

Milan, 6th September 2023

### **Agenda**

- 1 PROFILE
- 2 HIGHLIGHTS
- 3 SUSTAINABILITY PRINCIPLES AND COMMITMENTS
- 4 SUSTAINABILITY GOVERNANCE STRUCTURE
- OVERSIGHT IN THE ESG AREA
- 6 ESG RISK FRAMEWORK
- SUSTAINABILITY STRATEGY AND INTEGRATION INTO GROUP ACTIVITIES



### Diversified business model for a sustainable growth

Fully integrated offer of Banking, Brokerage and Investing via multi-channel approach

#### **Corporate purpose:**

to support clients in the responsible management of their savings in order to create the conditions for a more prosperous and fairer society

1H2

1H23 weight on total revenues for each product area

#### **Banking**

58%

- 100% of operations can be performed online or from apps
- Lending offered only to existing base of retail clients (no corporates)
- Strong focus in building a low-risk and high-quality portfolio thanks to internal IT culture and Big Data analytics



#### Investing

26%

- ➤ FAM (Fineco Asset Management, with 29.2bn TFA) key in delivering quality investment solutions for our clients
- ➤ More than 6,000 mutual funds by more than 70 Asset Managers worldwide
- Physical distribution network: 2,952 PFAs, third largest network in Italy<sup>(1)</sup>

#### **Brokerage**

16%

**Best-in-class brokerage platform** giving access to wide set of global markets, bonds, ETFs, futures, derivatives and multicurrency with 20+ currencies both online and mobile

#### **Our Key figures**

**TFA 1H23** 

€115.9 bn with 1.5 mln clients Net Sales 1H23

€5.2 bn €10.3 bn in FY22 adj. Net Profit 1H23

€308.9 mln +38.8% y/y

€428.8 mln in FY22

adj. Cost/Income 1H23

24.0%

**CET1 Ratio 1H23** 

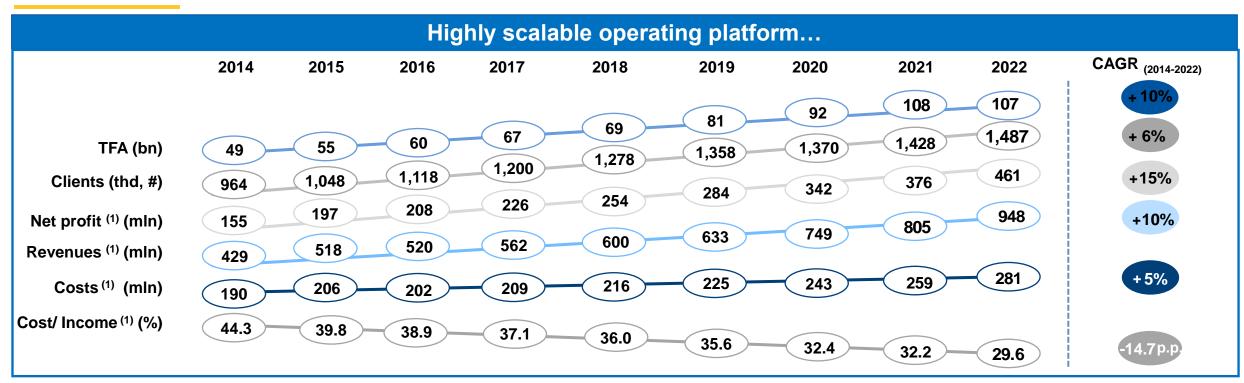
23.2%



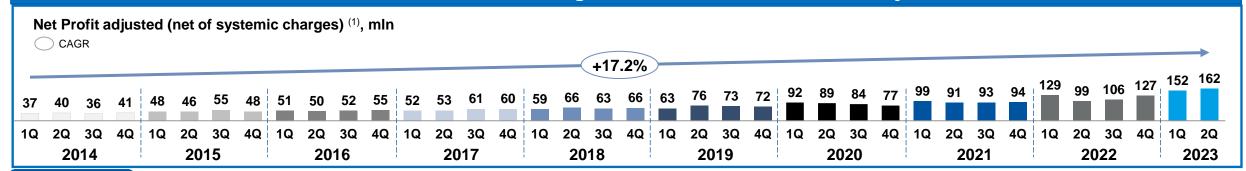
Figures as of June 30th, 2023

(1) Source: Assoreti

### Healthy and sustainable growth with a long-term horizon



### ...with a diversified revenues mix leading to consistent results in every market conditions





net; 4Q21: -

### Our Pillars as key drivers for Sustainability

We are a looking-forward organization playing for the long-run and able to generate a **positive impact for all our Stakeholders** and the society as a whole. The keys of our Strategy leads path of sustainable growth committed to **maximize Stakeholders' value** 

### **♥** EFFICIENCY

- ✓ Proprietary back-end: in-house development and automated processes allow an efficient cost structure and fast time to market
- ✓ Strong focus on IT & Operations and more flexibility
- ✓ Strong operating leverage thanks to best-in-class operating platform and internal IT culture

### INNOVATION

- ✓ **Digitization** as a main market trend and a key driver for Sustainability
- Anticipate customers need by simplifying their life
- ✓ Lending: strong competitive advantage leveraging on Big Data analytics

### **TRANSPARENCY**

- ✓ Fairness and respect for all our stakeholders
- ✓ High quality products and services for our clients
- ✓ Fair pricing and no performance fees
- ✓ Cost of funding close to zero
- ✓ High quality lending portfolio, offered only to existing base of clients and low cost of risk



### Total alignment with Clients' interest in the way we grow the business



**CUSTOMER SATISFACTION at 94%**(1)



NO short-term aggressive COMMERCIAL OFFERS and ZERO REMUNERATION on current accounts



Total ABSENCE OF PERFORMANCE FEES



BENEFITS from FAM SHARED WITH CLIENTS: better quality and timely products with lower TER

Low UPFRONT FEES representing only

1%

of Investing fees<sup>(2)</sup>



**FOCUS ON ORGANIC GROWTH** 

Low incidence of net sales from recruiting (~13%)<sup>(2)</sup>



Source: KANTAR TNS, May 2023
 Figures as of June 30<sup>th</sup>, 2023

## Highlights<sup>(1)</sup> (1/2)

### **Our People**



1,336 Employees (+31 vs 2021)

2,918 Personal Financial Advisors (+128 vs 2021)



42.2% women employees (41.7% in 2021)

57.8% men employees (58.3% in 2021)



**17.8%** women PFA (17.4% in 2021)

82.2% men PFA (82.6% in 2021)



99% employed on permanent contracts



77% Engagement Index



34 h average training per employee

81 h average training per Personal Financial Advisor

#### **Our Customers**



More than 1,450,000 Customers around 367,000 contacts per month



95 Score TRI\*M new index

Score of **4.7 out of 5** on Trustpilot



Financial Education: 62,300 participants in 1,432 events; participation in Financial Education Month<sup>(2)</sup>



(1) Source: 2022 Consolidated Non-Financial Statement.

<sup>(2)</sup> The initiative, held annually in October, is organized by the Committee for Planning and Coordination of Financial Education Activities (Edufin Committee) with the aim of disseminating throughout Italy financial, insurance and pension culture through events, conferences, seminars and public meetings

## Highlights<sup>(1)</sup> (2/2)

#### **ESG Offer**



87% funds, in terms of ISIN, have ESG Rating

of which **86%** have a rating «High», «Above Average» and «Average»





ASSET MANAGEMENT

 Funds ex Art. 8 SFDR (2)
 56%
 ISIN
 43%
 ISIN

 € 16.8 bn
 AuM
 € 13.0 bn
 AuM

 Funds ex Art. 9 SFDR (3)
 5%
 ISIN
 194
 ISIN

s ex Art. 9 SFDR <sup>(3)</sup> 5% ISIN 1% ISIN € 0.9 bn AuM € 0.3 bn AuM

91% funds, in terms of AuM (€ 29.4 bn), have ESG Rating

of which **92%** (**€ 27.1 bn**) have a rating «High», «Above Average» and «Average»



18% of all new purchase mortgage agreements refers to green mortgages for the purchase of A or B energy class buildings, amounting to € 63 mln, roughly 20% of the total amounts disbursed for purchase mortgage agreements



€ 1,745 mn of ESG bonds in the internal investment portfolio

### **Reducing environmental impacts**



**93.8%** exposure in debt securities of sovereign and bank issuers with a **Net-Zero in 2050 target**<sup>(4)</sup>



- -16% vs 2021 Scope 1 and 2 emissions (market-based) [tCO2e]
- 4% vs 2021 Operational Scope 3 emissions [tCO2e]



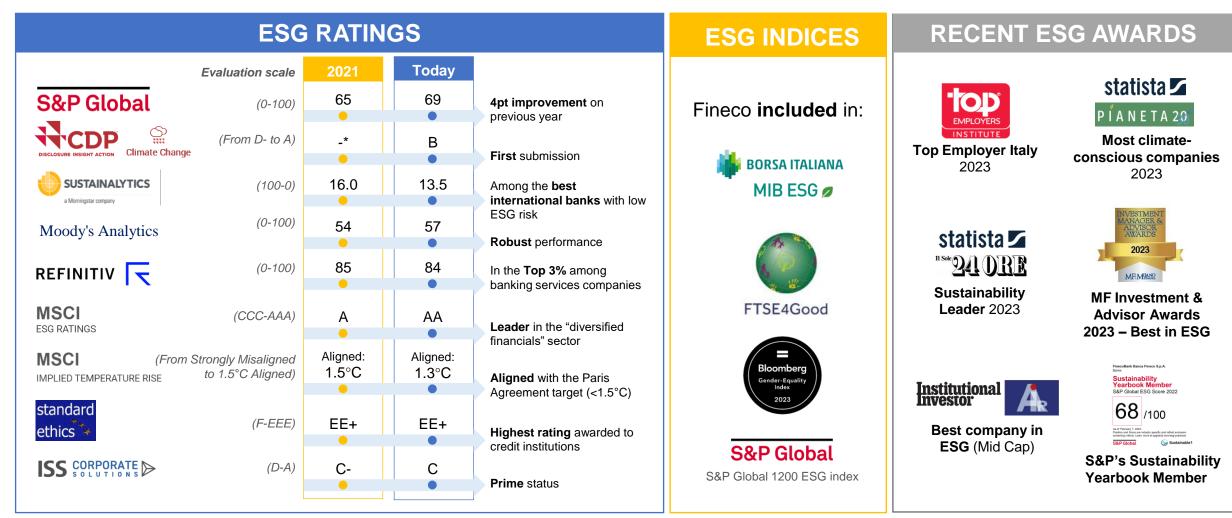
100% electricity purchased from renewable sources<sup>(5)</sup>



44 tons of paper saved through dematerialisation initiatives

- (1) Source: 2022 Consolidated Non-Financial Statement
- (2) Funds that, in addition to other characteristics, promote environmental or social characteristics, or a combination of those characteristics, provided that the companies in which the investments are made comply with good governance practices.
- (3) Funds that have sustainable investments as their objective
- (4) For sovereign issuers, the source for mapping Net-Zero targets is: <a href="https://www.climatewatchdata.org/">https://www.climatewatchdata.org/</a>. In "Policy Document" and "In law" targets are accepted, while "In Political Pledge" targets are not. For bank emissions, Net-Zero targets on financed emissions are mapped.
- ) The figure refers to electricity consumption related to the properties where the utilities are registered to Fineco

### Sustainability performance recognised by external parties



(\*) In 2021, FinecoBank responded to the 'minimum' version of the CDP Climate Change questionnaire, dedicated to companies in their first year of submission. The questionnaire response was made public on the dedicated CDP portal but did not provide a CDP scoring.



### **Sustainability Principles and Commitments**

The orientation toward a sustainable growth is a founding element of our long-term value creation strategy.

In line with the principles and standards of conduct enshrined in the Group's Code of Ethics, Charter of Integrity and Code of Conduct, Sustainability commitments has been formalized through the adoption of a number of **policies and commitments in specific areas**:



**Sustainability Policy** 



**Qualitative and quantitative** composition of the Board of **Directors of FinecoBank** S.p.A.





containment



**Gender Equality** 









General principles of information system security





**Privacy** 



**Anti-Money** Laundering and Combating the Financing of **Terrorism** 



Whistleblowing



**Combating** Harassment, Sexually **Inappropriate Behaviour and Bullying** 



### National and international commitments subscribed



environment programme finance initiative

Principles for Responsible Banking

Signatory of:





UN Global Compact is a voluntary initiative of the United Nations that promotes corporate social responsibility through respect for and adherence to Ten Principles concerning human and labour rights, environmental protection and anti-corruption

The <u>United Nations Principles for</u>
Responsible Banking are the set of
measures developed by the
innovative collaboration between the
world's banks and the UN
Environment Finance Initiative
(UNEP FI) to design a sustainable
future for the banking sector

The membership to the <u>United</u>
<u>Nations Principles for</u>
<u>Responsible Investment (PRI)</u>

initiative reinforces the commitment to the development of a sustainable financial system through the integration of social, environmental and good governance criteria into investment practices

Fineco Asset Management: Signatory since October 2020 Valore D is the organisation with a network of over 320 companies in Italy committed to ensuring an inclusive culture within organisations.

Thanks to this partnership, Fineco participates in specific training courses aimed at promoting female talent within the company

FinecoBank: Signatory since 2019

FinecoBank: Signatory since September 2020

Fineco Asset Management: Signatory since March 2022 FinecoBank:
Signatory since December 2020



### **Sustainability Governance Structure**

Since 2018, Fineco has integrated ESG principles into its governance, assigning specific responsibilities to governing bodies and operational functions

#### **Board of Directors (BoD)**

Deliberates on the strategic directions of the Bank and the Group

# Board-level Corporate Governance and Environmental and Social Sustainability Committee

Oversees Sustainability issues related to FinecoBank's business operations and the dynamics of interaction with all Stakeholders, as well as the evolution of the Bank's Sustainability strategy

### Board-level Risk and Related Parties Committee

Contributes to the definition of the guidelines of the internal control system so that the main risks, including ESG risks, are correctly identified, measured, managed and monitored, and supports the BoD in evaluating financial and non-financial periodic reports

#### **Board of Statutory Auditors**

As a supervisory body, is responsible for supervising compliance with the provisions established by Legislative Decree 254/2016 and reports in its annual report to the shareholders' meeting

#### Sustainability Management Committee (12 members and 2 permanent guests)

Entrusted with the main task of defining a proposal for the Bank's Sustainability strategy and the related objectives to be achieved, to be submitted to the Board-level Corporate Governance and Environmental and Social Sustainability Committee for consideration, as well as to the Board of Directors for approval

#### Sustainability Structure - CFO Department (3 FTEs)

Responsible for supporting the CFO and the Sustainability Management Committee in the management of Sustainability at Fineco, including the development and monitoring of the Sustainability Strategy and in the drafting and subsequent approval of the Non-Financial Statement and the EMAS Environmental Statement by the relevant Corporate Bodies

#### Functions involved in Sustainability activities (30 to 35 functions)

**Each Subsidiary:** 

Identifies an internal organizational structure with the role of main Coordinator of the implementation and ongoing supervision of the Sustainability-related activities and initiatives planned and carried out according to the responsibility of each Subsidiary



### **ESG** Regulatory oversight

A dedicated ESG regulatory oversight organizational model is established in FinecoBank, structured into thematic macroareas:

Macro-area	Corporate structure in charge of ESG regulatory oversight			
Non-Financial Disclosure	Sustainability Structure			
Requirements of corporate officers, related parties and connected persons, operation of the Assembly	Corporate Law & Board Secretary's Office			
Health and Safety	Real Estate Unit <sup>(1)</sup> ; Chief People Officer Department <sup>(2)</sup> ; Procurement Office <sup>(3)</sup>			
Labour Law	Chief People Officer Department			
Tax	Tax Affairs and Advisory Unit			
Environmental Protection	Chief People Officer Department <sup>(4)</sup> ; Real Estate Unit <sup>(5)</sup> ; Chief Financial Officer <sup>(6)</sup>			
Other Sustainability obligations	Chief Risk Officer department <sup>(7)</sup> ; Compliance Department <sup>(8)</sup>			

Proportionate to size and in consideration of the type of business, **Subsidiaries adopt the necessary oversight to ensure ESG compliance** at the local level and, therefore, at Group level

- (1) With reference to issues relating to compliance of workplaces (Titles I, II, VIII, IX, X, XI of Legislative Decree 81/2008), plant, machinery and equipment, keeping and updating compulsory documentation, identifying gaps in emergency personnel, verifying the technical and professional suitability of contractors, preparing the interference risk assessment document and calculating the safety costs, authorising sub-contracts
- (2) With reference to aspects relating to training, information, employee health surveillance, appointment of the Company Doctor, identification and designation of emergency staff, and communications to institutional bodies
- (3) With reference to issues relating to the identification of the scope of application of Article 26 and Title IV of Legislative Decree 81/2008, concerning maintenance or worksite activities, the identification of suppliers and the issuing of orders
- (4) With reference to legislation related to mobility management
- 5) With reference to regulations on responsible consumption, waste disposal and pollution reduction at properties used by the Bank and Financial Advisors
- (6) As Management Representative under EMAS Regulation; Sustainability Structure, reporting to the CFO, with reference to regulations related to the Environmental Management System
- (7) With reference to the regulations related to ESG risk management
  - With reference to regulations on investment services, banking and credit products, anti-corruption, anti-money laundering and combating the financing of terrorism, Conflicts of Interest, Gender Equality, Combating Harassment Sexually Inappropriate Behaviour and Bullying, Privacy, Compensation Policies, Whistleblowing



### **ESG Risk Framework**

Since 2020, the Group has been **integrating ESG risks** into its **Risk Management Framework**. In line with regulatory guidance, priorities have focused primarily on the Pillar II framework, with particular reference to **climate and environmental (C/E) risks** 

#### **RISK MANAGEMENT FRAMEWORK**

#### **RISK MAPPING**

- Integration of ESG risks into the Group Risk Map
- Ad-hoc focus on ESG risks in the context of the 2022/2023 Risk Inventory, aimed at estimating their impact on the already managed traditional risk categories

#### **RAF**

- Sustainability risks integrated into the Risk Appetite Statement 2023 such as Net Zero 2030/2050 targets
- ESG indicators integrated into the Risk Appetite

  Dashboard 2022/2023

#### **RISK MEASUREMENT**

- ESG risk metrics
- Integration of ESG factors into the ICAAP stress testing framework
- Risk metrics and stress tests are developed in consistency with the main vulnerabilities identified within the annual risk inventory process
- New reverse climate stress test
- New IFRS9 provisioning consider ESG risk

#### **RISK REPORTING**

Introduction of specific sections dedicated to ESG risks within the quarterly report on Group risk exposures

Fineco's **exposure to C/E risks is limited** by the inherent characteristics of its business model (e.g., absence of physical branches, corporate lending not envisaged, etc..)



Despite the limited exposure to ESG risks, the ESG risk focus carried out within the 2022/2023 Risk Inventory has identified two traditional risk categories which might be slightly affected by C/E risks



- credit risk could be affected by the deterioration in the creditworthiness of counterparties or by the decrease in the value of real estate collateral, triggered by C/E factors (e.g., extreme weather events)
- business risk could have long-term impacts due to changing customer preferences in the shift toward a low-emission economy



### **Cyber security**

- Security strategy follows a multi-tiered approach based on deep customer knowledge, behavioral analysis and risk assessment;
   vulnerability analysis and management capabilities well defined; strong monitoring of ICT Risk at 1 and 2 levels
- Formal and comprehensive Security Incident Response Plan. A detailed plan with a number of different levels (governance, organization, operation and reporting) tested at least annually
- Specific indicators related to losses for system failure and ICT incidents are monitored in the RAF and in the second-level control framework
- Core system and security services internally managed: ICT & Security Office Department (CIO 16% of total HC<sup>(1)</sup>) with a
  dedicated Anti-Fraud Team
- In 2022:



Over 13% of FinecoBank's technology budget invested in security solutions



>99.9% Uptime on main services(2)



Fraud rate level: official figures in bps<sup>(3)</sup> close to zero, both for cards management (<0.03 bps) and online money/wired transfers (<0.006 bps)



No significant losses registered for system failure



- 1) Source: 2022 Consolidated Non-Financial Statement
- (2) Home Banking, Order Entry, Trading Portfolio Order Monitor
- (3) Basis points, ratio between operating losses due to fraud and transaction volumes

### Sustainability Strategy: improving our accountability

In order to ensure an increasing integration of environmental, social and governance aspects within our Strategy, in January 2020 the Board of Directors approved a first set of **sustainability goals to be pursued in the years 2020-2023**, regarding **6 areas**.

The new ESG Multi-year Plan 2024-2026 is currently being finalised, considering also the updated material topics.



**Responsible Finance** 



**Human Resources** 



Financial Education and Community Support



**Supply Chain** 



**Relations with Shareholders** 



**Environment** 

For each area, Fineco aligns the specific objectives with the most relevant 17 <u>UN Sustainable Development Goals</u> on the basis of the common elements between the total 169 global targets and the Group's goals:





### 2022 Materiality Analysis: Methodology



 The Analysis started with an extensive list of potentially relevant topics, identified through desk research on sustainability issues considered relevant by Regulators, sustainability reporting Standards, Fineco's Peers and leading ESG Rating Agencies



 Through the filling of a questionnaire to the Bank's Departments, the Stakeholder Map was updated, leading to the identification of the four most relevant Stakeholders to be involved in updating the Materiality Analysis: Investors, Clients, Employees and Personal Financial Advisors



• The Stakeholders thus identified were then **engaged through a survey** aimed at identifying their views on:

- the importance of the topics with respect to the positive and negative impacts generated by Fineco's business on society, the environment and the economy;
- the importance of the topics that pose the greatest risks to Fineco and its operating and financial performance



 The survey results led to the preliminary identification of 19 priority themes, which were then merged to arrive at an updated list of 10 material topics



### **2022 Materiality Analysis: Results**

Cybersecurity and information security Customer Satisfaction Correctness Group's solidity and transparency and resilience of information Innovation Fair and inclusive work Responsible environment through talent attraction and retention Finance strategies and meritocratic remuneration policies Business ethics and compliance culture Financial Protection of the education and environment advice

LOWER IMPACTS HIGHER IMPACTS

TOPICS THROUGH WHICH FINECO GENERATES IMPACTS ON THE ENVIRONMENT. SOCIETY AND ECONOMY

Compared with the previous list of material topics (2020):

- the topic of Innovation has been enriched with additional meanings, in terms of business model innovation and innovation management capabilities to serve customer needs
- People management and development issues are more focused on equity, inclusiveness, and attraction/retention strategies, as opposed to less focus on well-established issues such as health and safety
- Economic performance and capital strength sit alongside the themes of responsible governance and reputation in defining Group's solidity and resilience
- Environmental Protection has a main declination in terms of reducing climate change-related impacts



HIGHER RISKS

FOR FINECO

GREATEST RISKS

TOPICS THAT POSE THE

### Sustainability Strategy 2020-2023: our goals



#### RESPONSIBLE FINANCE

- Increased supply of products with social and environmental value within the mortgages and loans sector
- Introduction of ESG criteria in product evaluation. ESG evaluation extended to 100% of new FinecoBank Group funds<sup>(1)</sup>
- Promotion and design of new funds based on ESG criteria
- Increased coverage of green and social bonds in FinecoBank's portfolio



#### **HUMAN RESOURCES**

- Monitoring and ongoing attention to the Gender Pay Gap issue; focus on issues such as the promotion of women in managerial roles, equal gender representation and the monitoring of how the return from maternity leave is managed
- Implementation of an employee training and awareness plan on Diversity
   & Inclusion and sustainability
- Performance management programme, aimed at all employees
- Implementation of initiatives related to flexible work (greater use), creation
  of employee areas (such as break areas), preventive health and
  healthcare
- Initiatives for consultations and turnover monitoring



### FINANCIAL EDUCATION AND COMMUNITY SUPPORT PROJECTS

- Promotion of specific **training and awareness-raising courses** on topics such as savings' management, which in the future will particularly involve targeted groups such as young people
- Provision of specific training on ESG issues for Financial Advisors in order to meet the demands of clients more attentive to these issues and, at the same time, to promote sustainability among less interested clients
- Allocation of annual investments in projects that benefit the community, according to different local needs and allocation of natural disaster funds (to postpone mortgage and loans payments, and suspend debt collection actions for insolvent customers)



 Suppliers assessment on the basis of ESG criteria, through an initial selfassessment questionnaire



#### **SHAREHOLDERS**

- Strengthening dialogue with socially responsible investors and sustainability rating agencies
- Participation in external initiatives that support the company's commitment to ESG themes



#### **ENVIRONMENT**

- Implementation of the Environmental Declaration
- Energy consumption/emissions: monitoring of internal company consumption with the aim of reducing consumption and emissions
- Company fleet: modernisation of the car fleet with hybrid / electric cars (with the possibility of recharging in the parking lot of company offices)
- Sustainable Mobility: refund of employees' annual bike-sharing subscriptions, upon request (both in Milan and Reggio Emilia)
- Material/waste management: reduction of plastic consumption by creating digital credit cards; replacement of plastic bottles by
  installing water dispensers and providing all employees with water bottles; purchase of recycled or certified paper and provision
  of separate collection facilities to all offices



19

### **Responsible Products and Investments**

#### LENDING

### INVESTING

GOAL



increased supply of products with social and environmental value within the mortgages and loans sector



introduction of ESG criteria in product evaluation; promotion and design of new investment solutions integrating ESG criteria



- Green loan development
- Y/Y increase of % exposure to ESG bonds out of total
- FinecoBank's lending policy focuses on granting credit facilities to Retail customers (no corporate lending) and provides that the assessment of real estate collateral shall also consider climate and environmental risks
- Strategic investments are mainly focused on Government bonds issued by countries not significantly exposed to climate and environmental risks
- Green mortgage offer enables the financing of the purchase of class A or B energy properties through a mortgage loan, at favorable conditions compared to the standard price list
- Initiatives aimed at promoting access to banking and financial services for young people
- Increased coverage of green and social bonds in FinecoBank's internal investment portfolio

- 100% of new ESG-rated funds out of total new ISINs entered into the platform since 2021
- Y/Y increase of % ESG-rated funds out of total ISINs in the platform
- Advisory services focused on offering solutions that take ESG criteria into account during the creation of model portfolios, through specific quantitative and qualitative analyses and with the support of **ESG ratings** that are widely recognised by the market
- Global Policy on New Product Process integrated with sustainability risks: the assessment of the risks associated with new products and substantial changes to existing products is integrated with the assessment of sustainability risks, establishing the requirement for any environmental, social and/or governance objectives to be included among the features of the products contained in the product identification form
- Regularly mapping the SFDR classification of the funds in its platform allows Fineco to guarantee an ESG offering in line with market's preferences



## Fineco Asset Management: adding value to our Sustainability Strategy



#### Milestones 2022 - 2023

- Fineco AM's commitment to 50% SFDR Article 8 and/or 9 AUM before year end 2022 was successfully achieved
- Full implementation of **exclusion policy** on all investments in line with international standards and global norms
- Enhancement of **portfolio management and compliance monitoring** systems to fully integrate ESG considerations
- Enhancement of Risk Framework to integrate ESG monitoring

- Updates made in 2023 to all fund documents and website disclosures in line with Sustainable Finance Disclosure Regulation
- Publication of the Fineco AM PAI (Principal Adverse Impacts) statement and reporting in June 2023
- Continuous **sustainability education** and training throughout the organisation to ensure best in class application

#### **Commitments 2023**

- Participant of the **UN Global Compact** with first reporting due in 2023
- Signatory of the **UN Principles for Responsible Investment** with first reporting due in 2023
- Collective Engagement via participation in UN PRI Advance, a stewardship initiative on human rights & social issues

- Continued active stewardship via **Proxy Voting in 2023 to ensure** proactive Engagement with investee companies in line with our responsible investment approach
- Enhancement of **Sustainable Investments methodology** underway in 2023
- Consideration and publication of **Principal Adverse Impact Indicators** "PAIs" in 2023 which measure negative effects on sustainability factors



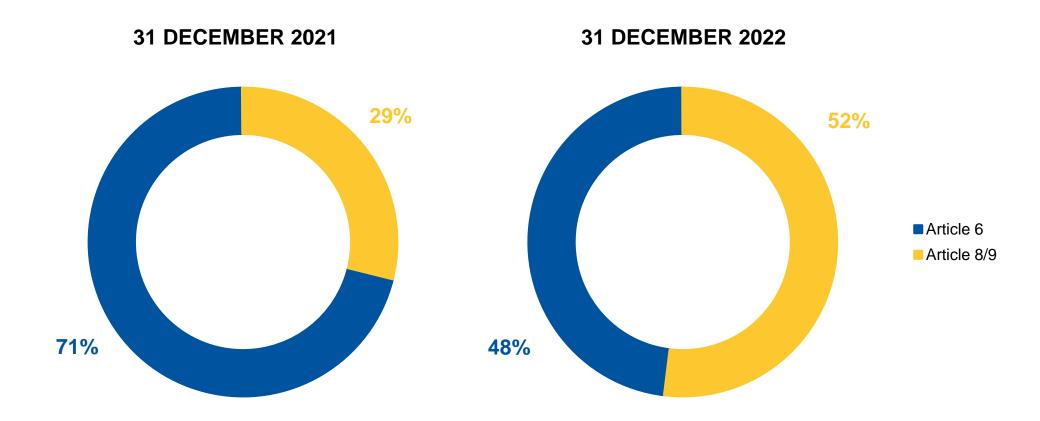






### Fineco Asset Management: ESG AUM Journey

Fineco AM is committed to continue to deliver strategies to customers in 2023 that integrate ESG characteristics





### $\gtrsim$

### **Human Resources**

People constitute one of the main **Key Success Factors:** the goal that Fineco aims to achieve every day is to become "**The Place To Be**" for its staff, a workplace in which everyone can fully express their potential and aspirations, contributing to the success and sustainability of the business.

With this aim, the **Human Resources Department** is committed to:



Invest in people development and growth, by creating an inclusive and sustainable working environment free of any form of discrimination, in which equal opportunities among employees are ensured



Maintain a high level of **motivation and engagement** which is measured through a specific survey to determine both the employee Engagement Index and the level of Fineco's reputation among the employees (Engagement & Reputation Survey). People Care, Working Environment, Work-life Balance, Best Place To Work and People Development are the areas Fineco is focusing on as a result of employee feedback



Design **appropriate training plans and programmes** to develop and strengthen personal, professional and managerial skills as well as the appropriate competencies to allow us to maintain our competitive advantage



Provide for a **total compensation approach** with the aim to attract, motivate and retain strategic resources. The remuneration strategy is based on a balance of fixed and variable, monetary and non-monetary components. Moreover, we support the well-being of employees and their families, by offering a comprehensive package of **welfare**, **healthcare** and **life balance** benefits



### Focus - Diversity and inclusion

Diversity of gender, thinking, experience and skills represents a value that enhances Fineco's professionalism, as well as a source of strength in an ever-changing competitive environment.

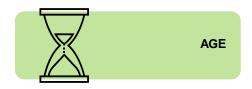
Our approach to diversity and inclusion focuses on:



Fineco is committed to ensuring equal opportunities in terms of:

- **professional development** (training and growth opportunities).
- Recruitment and selection process in line with the Global Policy on Gender Equality, avoiding every form of discrimination.
- Remuneration (with particular regard to gender pay gap) and gender balance.
- Work-life balance through hybrid working mode, ad hoc insurance plans, additional permits and structured welfare system.

In this area, we've started the activities aimed at achieving the **Italian Gender Equality Certification.** 



Fineco is committed to a workplace in which everyone, regardless of age, can fully express their potential and aspirations:

- the wellbeing area, recently opened, facilitates socialization among different generations.
- Customer Care is a "talent incubator" for young people.
- Fineco establishes a channel with 'digital natives' through social media and digital job fairs.
- Fineco@Work supports internal job rotation for employees of all ages.

#### Focus on PFA

Fineco continues its investment on young personal financial advisors providing training and financial support. In this regard, Fineco ranks first for the percentage of financial advisors under 35 (14.06%).



The Group is committed to supporting work placement of people with disabilities through:

- participation in **Digital Diversity** day and Inclusion Day.
- Partnership with Jobmetoo, an online company for recruiting candidates with disabilities.
- Enhanced **insurance plans** (e.g., Long term care).
- Contribution for relatives with disabilities.
- Fulfillment of legal obligations in term of recruiting through the specific tools provided by regulation.



The Group does not tolerate any form of discrimination and promotes cultural diversity. Among the initiatives:

- Ad hoc training on "cultural diversity".
- A digital platform for language training and customized learning paths.
- Managerial and Behavioral training, for promoting fair and inclusive environment.
- · Global Mobility opportunities.

#### Focus on FAM

FAM has diverse geographical footprint in terms of origin of its workforce, based on place of birth and citizenship. In fact, around 60% of workforce is international.



24

### Focus – Remuneration and ESG Strategy

The Remuneration Policy is consistent with corporate values and objectives, including ESG factors.

#### Short term incentive system

The 2023 Scorecard of the CEO and General Manager and that of the Identified Staff, depending on the specificity of the role, includes sustainable goals related to the capacity of generating medium-long term value for all the stakeholders. In particular, the goal "Stakeholder Value" declines ESG targets that are included and represented in the FinecoBank Group ESG Goals Plan, in alignment with the Group 2020-2023 Multi Year Plan.

#### Long term incentive system

In the 2021-2023 LTI Plan for employees, among the performance objectives considered, ESG parameters relating to customer satisfaction, employee engagement and the extension of the ESG rating to all new funds were introduced in line with the Multi Year Plan.

#### 2023 CEO Scorecard - Stakeholder value

WEIGHT	GOAL NAME	REFERENCE TARGET 2023
15%	Stakeholder Value	Improve/maintain the scores of the main ESG ratings: S&P CSA, CDP Climate Change, Sustainalytics, MSCI, Moody's ESG Solutions, Standard Ethics.
		Responsible finance: y/y % of new ISIN funds with ESG rating
		Delta on Gender Pay Gap and Gender Balance (Y/Y)
		Improve Fineco's environmental performance: maintainance of EMAS Registration, also through the achievement of the Environmental Program goals with particular reference to the development of new green lending product.

#### LTI 2021-2023 Performance goals - Stakeholder value

GOALS	KPIs	WEIGHT	TARGET -	ASSESSMENT CRITERIA	
GOALS	KFIS			Threshold	Payout
STAKEHOLDER VALUE 15% equally weighted	Customer satisfaction	5%	Average	≥ 90 pt	100%
				85 pt - 90 pt	0% - 100%
				≤ 85 pt	0%
	People engagement	5%	Average	≥ 76%	100%
				71%- 76%	0% - 100%
				≤ 71%	0%
	ESG rating for all new funds	5%	EOY 2023	100%	100%
				80% – 100%	0% - 100%
				≤ 80%	0%



### Our PFA Network



The FinecoBank Network's strategy is based on the fundamental pillars of growth, transparency and quality of customer relations, innovation and efficiency



The selection process focuses on qualified professionals with proven experience



Another pillar is the Bank's **investment in junior talent**, to promote generational change in the network and update the working methods and professional culture. New PFAs are provided thorough a strong induction process



The implementation of the Network strategy is always based on listening to the needs, suggestions and ideas originating from the advisors, who have direct contact on the community and are more aware of customer expectations

Area Managers (AMs)

Group Managers (GMs)

**Personal Financial Advisors (PFAs)** 

The Network, the second largest in Italy in terms of total financial asset<sup>(1)</sup>, is organised on **three** levels:

- AMs are the most senior role in the Network and are mainly dedicated to promoting business development and coordinating staff in the geographical areas assigned to them
- GMs are the intermediate role in the Network, who, in addition to managing customers, have the managerial task of coordinating the PFAs within local areas
- **PFA's represent the base of the pyramid** and are the people almost exclusively responsible for the customer management



FinecoBank S.p.A. – Public

### **Financial Education and Community Support**

#### FINANCIAL EDUCATION



Promotion of specific training and awareness-raising courses on topics such as savings' management;
Provision of specific training on ESG issues for
Financial Advisors

- Financial education activities aim to **increase awareness and knowledge** of the way in which the financial markets function, and of the best and most appropriate use of financial instruments in order to better manage resources
- Training and financial education initiatives target both customers and prospects and cover a variety of topics, such as:
  - behavioural finance
  - √ financial planning
  - ✓ supplementary pensions
  - √ asset management
  - accumulation plans
  - asset planning

and are also carried out **through membership in external initiatives** such as that to **FEduF**, the Foundation for Financial and Savings Education established by the Italian Banking Association for the purpose of social benefit by promoting Financial Education

#### **COMMUNITY SUPPORT**



Allocation of annual investments in **projects that benefit the community**, according to different local needs (e.g.: schools,
universities, hospitals, health and cultural associations);
Allocation of natural disaster funds (to postpone mortgage and loans
payments, and suspend debt collection actions for insolvent
customers in the event of disasters or natural disasters)

- Since its foundation, FinecoBank has been committed to supporting effective charitable projects in various areas of intervention (e.g., social and health care, training, education, culture and art, scientific research and environmental protection)
- To be approved, **projects must be promoted by non-profit organisations** (NGOs, Foundations, Associations, Religious bodies,
  Universities, Public Institutions) whose activities cover a wide area across
  Italy
- The process of identifying associations and approving donations involves a careful selection and a compliance assessment, by requesting and analysing specific documentation concerning the association and the initiative for which the contribution is being requested. A questionnaire is also submitted to organisations in order to avoid taking on initiatives that would benefit entities involved in acts of corruption



### **Supply Chain**



Suppliers who invoice FinecoBank for a total annual amount of €25,000 or more (including VAT)<sup>(1)</sup> are required to submit an **ESG Questionnaire**. The process enables the **monitoring of any risks related to the procurement process**, mainly related to the possible selection of suppliers involved in illegal operations or who have been involved in disputes regarding social responsibility



In 2022, FinecoBank signed an Agreement, in force throughout 2023, with nationwide supplier of electricity and natural gas, according to which:



- the electricity supplied comes from 100% renewable sources
- methane gas is 100% CO<sub>2</sub> free, thanks to the purchase of an amount of certified carbon credits that allows for full offsetting of the carbon dioxide generated

All PFAs who own an electric utility in the Fineco Center can join the Agreement for the supply of 100% renewable electricity at the **same contractual and economic conditions** applied to Fineco



As for the procurement of image processing devices (i.e., printers, multifunctional devices, scanners, professional image processing product), specific guidelines has been adopted in tender specifications that include **green procurement criteria** based on best practices and EU GPP criteria<sup>(2)</sup>





### **Relations with the Financial Community**

Fineco supports a constant, transparent and thorough dialogue with the financial community, within its strategy aimed at creating **Shareholders' value** in the long term.

In this context, the Board of FinecoBank on December 16<sup>th</sup>, 2021, approved the **Policy for Managing the dialogue with the Financial Community**, aimed at:



Managing dialogue in accordance with the Principles of **transparency of information** provided to the Financial Community by ensuring that it is **clear, complete, truthful and not misleading** 



Respecting the Principle of **equal treatment of the holders** of financial instruments issued by the Company



**Comply with the laws and regulations in force** from time to time, with particular attention to those relating to the banking and listed issuer nature of the Company - especially the regulations on market abuse and inside information - as well as the internal governance rules, in full cooperation and transparency with supervisory authorities





### **Environmental management at FinecoBank**

As part of the Environmental Policy, numerous commitments on environmental management involve the Bank and the PFA Network



**Environmental Management System**, certified by a third-party independent auditor in compliance with the requirements of the European **EMAS Regulation no. 1221/2009/EC** and implemented throughout **the whole perimeter** of the offices, i.e., corporate offices, Data Processing Centers and the entire Network of Fineco Centers throughout Italy



Adoption of a **Global Policy on Reducing Energy Consumption** and appointment of an **Energy Manager** in charge of the coordination of **energy efficiency initiatives** 



Adoption of **sustainable mobility initiatives** for employees



Implementation of an Environmental Internal Audit Plan covering the whole Fineco Center Network in Italy

Over 70 audited sites per year



Installation of photovoltaic panels at the Milan head office, to be activated by 2023



Support to the entire PFA Network with the provision of a **Vademecum for Efficient and Effective Environmental Management** and related **ongoing helpdesk** 





### Commitment towards Net-Zero emissions by 2050

2021 **RESPONSIBLE FINANCE - Scope 3 emissions from internal investment portfolio** Exposure in countries, institutions and banks: > 70% of 2021 Total Consolidated Assets % exposure in debt securities of sovereign and bank issuers with a Net-Zero 64.5% 95%(2) 100% target by 2050<sup>(1)</sup> **ENVIRONMENT - Scope 1, 2 and Scope 3 emissions from operations** Scope 1 – CO<sub>2</sub>e from energy consumption of Milan registered office and of the 410 - 35% - 90% Fineco Centers with utilities in the Bank's name; CO<sub>2</sub>e from fuel for company car fleet tCO<sub>2</sub>e Scope 2 (market-based) - CO<sub>2</sub>e from energy consumption of Milan registered office and neutralisation of residual emissions and of the Fineco Centers with utilities in the Bank's name **Scope 3** - CO<sub>2</sub>e from paper consumption of all sites; CO<sub>2</sub>e from energy consumption 1,336 - 20% - 90% of Reggio-Emilia Headquarters, of Fineco AM's Dublin office, of the Data Processing tCO<sub>2</sub>e Centers and of the Fineco Centers with utilities in the Personal Financial Advisors' and neutralisation of

name



residual emissions

<sup>(1)</sup> For the sovereign issuers, the source for mapping Net-Zero targets is: <a href="https://www.climatewatchdata.org/">https://www.climatewatchdata.org/</a>. In "Policy Document" and "In law" targets are accepted, while "In Political Pledge" targets are not accepted. For bank issuers, Net-Zero targets on financed emissions are accepted.

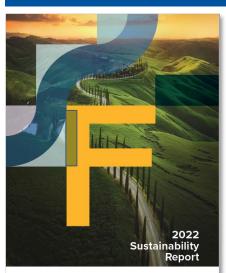
<sup>(2)</sup> Target subject to formalisation of Net-Zero commitment in a national policy document by Italy.

### Disclosure and Transparency

All commitments, goals, actions implemented and results achieved are reflected in our transparent and full disclosure approach and are available on our website. In 2023:

- the fourth Consolidated Non-Financial Statement (NFS) of the FinecoBank Group, prepared in accordance with Articles 3 and 4 of Legislative Decree 254/2016 and covering the financial year 2022, was published. In line with the previous years, the Report was prepared in accordance with the GRI Standards<sup>(1)</sup>. A new addition to 2022 NFS is the data and information to meet the disclosure requirements of Annex IV of Regulation 1221/2009/EC – verified by a third-party independent auditor within the annual EMAS verification process<sup>(2)</sup> – and those arising from the adoption of the United Nations Principles for Responsible Banking (PRB), as set out in the related reporting template.
- For the first time, the FinecoBank Group Public Disclosure Pillar III was integrated with the disclosure on ESG risks

#### 2022 CONSOLIDATED NON FINANCIAL STATEMENT



CONSOLIDATED NON-FINANCIA

LETTER FROM THE CEO

METHODOLOGICAL NOTE

1. GROUP PROFILE

2. STAKEHOLDER RELATIONS AND MATERIALITY ANALYSIS

3. OUR CUSTOMERS

4. INNOVATION

5. SOLIDITY AND RESILIENCE

6. ETHICS AND COMPLIANCE **CULTURE** 

7. OUR PEOPLE

8. COMMUNITY

FINECO

9. ENVIRONMENT

**GRI CONTENT INDEX** 

**EXTERNAL AUDITORS' REPORT** 

**Principles for Responsible** Banking Reporting and Self-Assessment Template

SDGs and related relevant

targets

Organisational chart

#### FINECOBANK GROUP PUBLIC DISCLOSURE - PILLAR III

**FINECOBANK GROUP PUBLIC DISCLOSURE** - PILLAR III

AS AT 31 DECEMBER 2022

Introduction

[...]

Exposures to credit risk and dilution risk

Disclosure of the use of the Standardised Approach Disclosure of the use of credit risk mitigation techniques

Exposures to counterparty credit risk

Operational risk management

Market risk

Exposures to interest rate risk on positions not held in the trading book

Liquidity requirements

**Encumbered and unencumbered assets** 

Leverage

Disclosure of environmental, social and governance risks

Remuneration policy

[...]

The scope and data verified within the EMAS verification process include FinecoBank S.p.A., consistently with the scope of EMAS Registration.

The scope of data and information includes companies consolidated on a line-by-line basis within the Consolidated Financial Statements 2022, namely FinecoBank S.p.A.

# THANK YOU