



Global Policy

Global Policy on Gender Equality

FB 065_2024

Approving Function Board of Directors

Date December 2024

Proposing Function Chief People Officer Department

Contents

1. INTRODUCTION	3
1.1 Scope	3
1.2 External Regulatory Framework	3
1.3 Glossary, Definitions and Acronyms	4
2. SUMMARY	4
3. THE GUIDELINES	6
3.1 Selection, recruitment and internal appointments.....	6
3.2 Professional development	7
3.3 Pay Equity.....	7
3.4 <i>Work-life balance and parenting</i>.....	8
3.5 Training and information.....	8
4. MEASUREMENT	8
5. RESPONSIBILITIES.....	8
6. COMMUNICATION AND IMPLEMENTATION	10

1. INTRODUCTION

FinecoBank S.p.A. and for Group Companies. FinecoBank S.p.A. within the scope of its role as a parent company - in compliance with applicable laws and regulations¹ as well as in accordance with the Group's management coordination system defined by the "Group Managerial Golden Rules" – issues guidelines in the interest of the stability of the Group in order to fully exercise its role of management and coordination.

This document (hereinafter "Global Policy" or "Policy") integrates the Group regulations, is directly applicable to the Parent Company² and is addressed to Group Subsidiaries.

As established in the Management of the Group's Rules and Regulations Global Policy, this document shall be adopted complying with legal requirements and provisions in force at local level; in the event of any conflict between this Global Rule (hereinafter also GR) and the applicable local law (or in case of greater restrictions by the local law), the latter shall prevail.

After approval by Fineco's deputy bodies, Fineco, in its capacity as Parent Company, transmits the GR to the recipient Companies for approval by their respective Corporate Bodies and monitors its correct and timely implementation, also making use of its internal functions identified from time to time.

Group Companies are therefore required to promptly begin the necessary activities aimed at the correct application of this document, after appropriate assessment and approval by their competent bodies.

In the event that the Group Company considers that:

- this *Global Rule* is not applicable, or
- it is necessary to amend/make exceptions to the provisions in this *Global Rule*,

for the purposes of compliance with local legislation (if more restrictive) or due to organisational and operational constraints, the Group Company must request a Non-Binding Opinion to the Chief People Officer, in accordance with the provisions of the Group regulations in force (Management of the Group's Rules and Regulations).

1.1 Scope

The purpose of this document is to define principles and guidelines for the development of Human Resources (HR) processes and practices that contribute to the creation of a gender-balanced leadership pipeline, within which all genders are represented reflecting the corporate population and the contributions of each are fairly valued in decision-making processes at all levels of the organisation.

1.2 External Regulatory Framework

Legislative Decree No. 198 of 11 April 2006 on the Equal Opportunities Code for Men and Women, as amended.

Law 162/2021 on amendments to the Equal Opportunity Code introducing the Gender Equality Certification.

¹ Internal and external regulations in effect as of the date of issuance of this document; subsequent updates where applicable from time to time

² In case of divergence between the Parent Company's Responsibilities set forth in these regulations and those set forth in the Regulations of Corporate Bodies, Bylaws, Internal Regulation, Delegated Powers of FinecoBank from time to time in force, the latter shall always prevail.

1.3 Glossary, Definitions and Acronyms

Key word	Definition
Parent Company	FinecoBank S.p.A. (hereinafter also "FinecoBank", "Fineco" or "Bank").
Group Companies	FinecoBank Group Companies, meaning the Parent Company FinecoBank itself and its Subsidiaries.
Group subsidiary	Company directly or indirectly controlled by FinecoBank S.p.A. (hereinafter also "Subsidiary" or "Subsidiary Company" or "Legal Entity" in short "LE").
Group	The FinecoBank Group, consisting of FinecoBank S.p.A. and the Companies/Legal Entities of the Group (hereinafter also "Fineco Group").
Employees	For the purposes of these rules, this includes all persons linked to FinecoBank and Group Companies by a contract of employment, as well as all members of the executive, strategic and control bodies.
Diversity Manager	The Diversity Manager is the point of reference for activities and initiatives related to the topic of Diversity.
Impacts	The effect the undertaking has or could have on the environment and people, including effects on their human rights, connected with its own operations and upstream and downstream value chain, including through its products and services, as well as through its business relationships ³ .
Relevant Risks	Sustainability-related risks with negative financial effects arising from environmental, social or governance matters that may negatively affect the undertaking's financial position, financial performance, cash flows, access to finance or cost of capital in the short, medium or long term.
Opportunities	Sustainability-related opportunities with positive financial effects.

2. SUMMARY

FinecoBank is aware that a diversified workforce guarantees multiple perspectives, fosters innovation and contributes to creating a stimulating work environment.

The Group is therefore committed to developing an organization that knows how to get the best out of the talents, abilities, experiences and diverse cultural backgrounds that a pluralistic organization can offer, where people feel respected, and appreciated and can express their potential.

³ Commission Delegated Regulation (EU) 2023/2772 of 31 July 2023 supplementing Directive 2013/34/EU of the European Parliament and of the Council with regard to sustainability reporting principles, Table 2 - Definitions of terms used in ESRS.

The Groups adopted an approach to diversity that takes into account the different needs expressed by customers, employees and communities.

The Group believes that fostering a culture of inclusion and empowering differences at all levels of the organisation is of strategic importance.

Aware that upholding a culture of inclusion is a long-term and complex process, the FinecoBank Group recognises the equal dignity and opportunities of all its employees, regardless of age, gender, disability, sexual orientation, place of origin, place of residence, religion, type of employment contract or any other personal or professional characteristic.

As regards gender, the Group believes that teams with a better gender-balanced, at all levels of the organisation, have a greater possibility of taking the opportunities offered by the dynamics of a global society, thus generating value for our customers, for the communities where we operate and for shareholders.

While the Group is committed to creating a culture of inclusion in order to avoid any form of discrimination, this Global Policy is explicitly dedicated to gender equality (in this document, the definitions of "gender equality" and "gender balance" have the same meaning) and aims to underline the Group's commitment to:

- Promote a stimulating, creative and non-discriminatory workplace for all employees and external partners
- Prohibit any conduct that might adversely affect a person's dignity
- Adopt a zero-tolerance approach to harassment and all forms of discrimination in any area: sex, gender identity, age, origin, religion, gender orientation, physical appearance, health, disability, political opinion, nationality, family situation and any other personal and/or professional condition
- Ensure equal opportunities for every employee or candidate in terms of recruitment, access to training, remuneration, welfare systems, internal mobility and career development: the only factors considered by the Group in such processes and systems are the skills, experience and personal suitability of employees/candidates.
- Promote diversity, so that the different identities of Fineco's people are a strength and a key factor in the Bank's success;
- Promote gender equality in order to protect the less represented gender within the corporate population

Studies and research show that the development of a clear HR policy and processes that guarantee gender equality is a main factor of success, along with monitoring key indicators and implementing specific development programmes.

In this regard, the Parent Company's "Managerial Sustainability Committee, as the Steering Committee for Gender Equality" (hereinafter also referred to as the "Steering Committee") oversees the subject matter of this Global Policy and ensures its effective adoption and continuous application in accordance with the regulations and practices in force from time to time. It sets out specific objectives and measures

to promote and develop gender equality.

The reporting on the Group's impact, risks and opportunities related to the principles of diversity, equity and inclusion is an integral part of the fulfilment that are implemented through the sustainability reporting included in the Consolidate Financial Statement and drawn up in accordance with the regulations in force from time to time on corporate sustainability reporting (Corporate Sustainability Reporting Directive, hereafter CSRD).⁴

3. THE GUIDELINES

The guidelines on gender equality must be adopted throughout the Group and for all HR processes and procedures to promote an equitable environment in which all employees, regardless of gender, can fulfil their potential.

The guidelines relate to the following areas:

- a) Selection, recruitment and internal appointments
- b) Professional development
- c) Pay equity
- d) *Work-life balance and parenting*
- e) Training and information

3.1 Selection, recruitment and internal appointments

The Fineco Group is committed to pursuing and, where appropriate, implementing gender equality initiatives in the selection, recruitment and management of employment positions.

Selection, recruitment and internal appointment processes and procedures must ensure that:

- both genders are represented in external recruitment processes and that the shortlist of candidates therefore includes at least one representative of each gender;

there are no discriminatory criteria when describing job offers and defining the responsibilities of a specific role. In this regard, the Equal Opportunity Employer (EOE) Statement⁵ is adopted in all external and internal advertising: *"The Fineco Group is proud to be an Equal Opportunity Employer and is committed to creating a working environment that is safe and inclusive, based on mutual respect and valuing every kind of diversity, offering equal work opportunities.*

- all genders are represented in internal appointment processes and that shortlists for management positions include at least one representative of each gender.

The principles in this Global Policy are communicated to external partners involved in the recruitment and training process (employment agencies, recruitment companies, public employment bureaus and executive recruitment companies).

⁴ At the enactment of this legislation: D. Lgs. no.125/2024. Legislative Decree No.125/2024, which transposes Directive 2022/2464/EU into Italian law.

⁵ The statement below shall be used by group companies complying with the principle indicated, in the local language as necessary.

The comply or explain rule is applied to the above recruitment and internal appointment processes, for managerial positions with banding starting from “*First Vice-President*”⁶

3.2 Professional development

Each Fineco Group company is committed to providing development opportunities (training, coaching, mentoring, on-the-job development activities) without gender discrimination, taking into account the role held, the responsibilities involved, the assessment of performance and potential. Each Group company should adopt clear standards and criteria that are consistent with the performance management, leadership development and talent development processes and the Global job model.

In this context, through the Performance Management process⁷, dialogue between Managers and Employees is fostered and the definition of ongoing development initiatives without gender discrimination, promoting a constructive confrontation aimed at empowerment through the use of feedback as a tool for continuous improvement.

Fineco is committed to promoting an inclusive leadership model and to offering all its employees equal opportunities for career development and promotion, without gender or any other form of discrimination. Training sessions are planned for all employees aimed at raising awareness on valuing differences, gender equality and inclusion.

Furthermore, the Group is committed to ensuring that all employees are equally involved in all training initiatives and courses, without any form of gender discrimination.

3.3 Pay Equity

The remuneration system determines the total remuneration of employees according to their role, areas of responsibility, the performance achieved and the overall quality of their contribution to the company's results.

The Fineco Group is committed to ensuring that its Remuneration Policy is gender neutral and contributes to the pursuit of equal opportunities in terms of career and salary development (remuneration and benefits), irrespective of gender, as well as age, ethnicity, culture, disability, sexual orientation, religion, political affiliation and marital status. In this context, any gender pay gaps, as defined by applicable regulations, will be monitored to identify and take appropriate corrective action. In addition, the Group is committed to raising awareness and attention to transparency, gender pay equity and diversity management at all levels of the organisation, starting with top management.

⁶ The "Comply or explain" rule requires that any deviation from the stated principles be adequately justified; this rule is applicable to all Group companies that have adopted the "Global Job Model".

⁷ Performance Management is the performance appraisal process based on principles of transparency and objectivity

3.4 Work-life balance and parenting

Each Fineco Group company is committed to improving the work-life balance of its employees through various initiatives aimed at promoting the well-being of all workers, regardless of gender, and avoiding any form of discrimination, as part of a comprehensive and structured welfare system.

By way of example, these initiatives aim to:

- offer flexible working models, (e.g. part-time, flexitime, flexible work, etc.) that are compatible with organisational and business needs
- offer additional leave for key life events (e.g. leave for child's graduation, mortgage underwriting, etc.)
- support employees during and after long periods of absence (parental leave, sabbatical leave, sick leave and other long-term leave) in the following ways:
 - a) avoid any discrimination before, during and after the period of absence;
 - b) facilitate the maintenance of contact with the company during the period of absence;
 - c) facilitate reintegration at the end of the period of absence (e.g. refresher courses, etc.).

3.5 Training and information

Each Fineco Group company is committed to promoting the goal of gender equality by ensuring that the people involved in the recruitment and human resources management processes receive adequate training and all the necessary information related to this issue, and that gender equality is included in the professional and managerial development paths.

4. MEASUREMENT

The Parent Company believes that a Group-wide monitoring system in each Group company is essential to ensure that gender equality is properly managed and, if not, that the phenomenon is subject to timely assessment.

The HR function of each Group company is responsible for monitoring at least once a year and collecting data on the population, broken down by gender and professional level, regarding recruitment, appointments, promotions and succession plans, and for reporting the results to the Parent Company's Chief People Officer Department.

The Chief People Officer's Department, through the Diversity Manager or, in their absence, a member of the same department, is responsible for providing adequate information to the Parent Company's Steering Committee for Gender Equality on the annual monitoring and progress of the actions taken to ensure the effective implementation of this Global Policy.

5. RESPONSIBILITIES

This Global Policy aims to influence corporate culture and impact gender equality at all levels of the organisation. All employees therefore have an active role and are responsible for its implementation. Some functions play a key role in the implementation process as specified below.

The HR function of each Group company is responsible for ensuring that impacts, risks, and opportunities in relation to the principles of diversity, equity, and inclusion are managed through:

- monitoring gender equality (e.g. Gender Pay Gap monitoring);
- appointing the Company's Diversity manager (in the absence of appointment, the Diversity manager is identified as the Head of the Company's People Management & Development organisational unit)⁸;
- collecting, by gender, data on recruitment, appointments and promotions and any other information time by time required.

The Parent Company HR function is responsible for:

- updating and amending, if necessary, the Global Policy on Gender Equality;
- receiving from the subsidiaries gender data on recruitment, appointments and promotions and any other information time by time required;
- receiving from the subsidiaries the results of the gender equality monitoring for analysis and sharing of results;
- informing and involving company trade union representatives also in the work of the "Commission for Work-Life Balance, Innovation and Company Welfare" on initiatives concerning gender equality.

The Diversity Manager in the Fineco Group is identified as the Head of FinecoBank People Management & Development and is responsible for supporting the Parent Company's Steering Committee for Gender Equality in the implementation of the Global Gender Equality Policy by monitoring initiatives aimed at promoting its effective implementation. It is also responsible for informing the Steering Committee on the monitoring of initiatives in this area.

The Heads of the organisational structures of the Group Companies must ensure in the execution of their role:

- their colleagues' awareness and full understanding of the principles set out in this Global Policy;
- personal understanding of this Global Policy so that questions, concerns and complaints are handled effectively and with due sensitivity;
- the selection and promotion of employees on the basis of meritocratic criteria and regardless of gender;
- a performance appraisal that is not influenced by the use of flexibility tools or by any discriminating factor.

All employees are responsible for promoting a culture of inclusion and the guiding principles of this Global Policy on gender equality. Any behaviour inconsistent with the principles contained in this document may be reported through the channels provided by the Global Whistleblowing Policy in force in each Group company.

⁸ For small subsidiaries with no People Management & Development function, the role of Diversity Manager is assigned to the HR Manager as part of their ordinary duties

6. COMMUNICATION AND IMPLEMENTATION

All Group employees as well as new recruits must become familiar with the contents of this Global Policy through various initiatives including, among others, internal communications and news published on local intranets. This document only applies to the Group's own activities.