



B A N K

Global Policy

Combating harassment, sexually inappropriate behaviour and bullying

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Approving Function Board of Directors

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1 INTRODUCTION

1.1 Document objective and content summary

This Global Policy, inspired by national and international regulations and agreements, by the Group's values and Code of Conduct, commits FinecoBank to supporting a work environment that is serene, professional and encourages involvement, without any type of harassment, sexually inappropriate behaviour or bullying.

The purpose of this Global Policy is to prevent, identify, prohibit and constantly monitor events attributable to harassment, bullying and inappropriate sexual behaviour, and also support people who report such events (Employees and Third Parties), protecting them from any type of retaliation.

This Global Policy consolidates the Group's commitment to guaranteeing a work environment inspired by equal treatment and equal dignity, regardless of age, race, skin colour, nationality, citizenship, political opinions, religion, civil status, gender, sexual orientation and identity, disability or belonging to any category protected by law.

The Group is convinced that any harassment, bullying or sexually inappropriate behaviour is a threat to the dignity of the person involved, whose physical and mental health and confidence may be affected, and is also damaging to the motivation and performance of staff, the organisational climate and reputation of the Group.

Harassment, sexually inappropriate behaviour and bullying are not tolerated in any way whatsoever. All employees shall be mindful of their behaviour and what they say, as this may be perceived and interpreted differently by each person.

After appropriate assessment and approval by competent bodies, Group companies are therefore required to start necessary activities for the correct application of this document.

If a Company considers that:

1. this *Global Rule* is not applicable, or that
2. amendments/exceptions to the provisions in this Global Rule are necessary, for compliance with local regulations (if more restrictive), or due to organisational and operational constraints, the Company shall request a Non Binding Opinion from the Human Resources Function, in accordance with applicable Group regulations (Group Principles for the Management of Global Rules).

1.2 Legal content and scope

The Group observes - and all its Employees must observe - applicable national and international regulations. If Group standards and provisions are stricter than the regulations of some countries, FinecoBank requires the stricter rules in this Global Policy to be observed.

This Global Policy, which is for all FinecoBank Group Companies, applies to all conduct of any Employee both at company offices and outside (for example at customers' offices, business travel), and is valid for all work contexts, including business trips, meetings, events and all social situations related to the Group and its business. Although not able to control the behaviour of Third Parties, the Group

will not tolerate any harassment, sexually inappropriate behaviour or bullying that involves Third Parties, and will take appropriate *consequence management* measures to stop and prevent such behaviour. The Group will take all appropriate measures to prevent such harassment, sexually inappropriate behaviour and bullying, and to ensure that the person reporting them is not affected by any negative impacts of any kind, also in terms of assigning duties or other work activities.

1.3 Glossary

	Definition
Parent Company	FinecoBank S.p.A. (hereinafter also “FinecoBank”, “Fineco” or the “Bank”).
Group subsidiary	The Entity directly or indirectly controlled by FinecoBank S.p.A. (hereinafter also “Subsidiary Entity”, or “Subsidiary” or “Legal Entity”, in brief “LE”).
Group Company	Companies of the FinecoBank Group, which is the Parent Company FinecoBank and its Subsidiaries.
Group	FinecoBank Group, consisting of FinecoBank S.p.A. and the Group Companies/LE (hereinafter also “Fineco Group”).
Employees	All persons related to FinecoBank and Group Companies by a work contract as well as all members of executive, strategic and control boards.
Third Parties	Natural or legal persons connected to the Group by a contract, such as customers, suppliers.

2 COMMITMENT AND GENERAL PRINCIPLES

In carrying out their day-to-day work, even remotely, employees shall contribute to creating and maintaining a work environment in which there is mutual respect and fairness, that aims to eliminate intimidating, hostile, degrading, humiliating or offensive behaviour. Employees shall respect the rights and dignity of the person, and maintain an environment in which harassment, bullying and sexually inappropriate behaviour are considered to be unacceptable.

The Group does not tolerate any type of harassment, sexually inappropriate behaviour or bullying, and considers respect for and the inviolability of all Employees' rights throughout the Group to be fundamental.

2.1 Harassment and sexually inappropriate behaviour

This Global Policy specifically prohibits any inappropriate act or behaviour intended to violate the dignity of a person or create an intimidating, hostile, degrading, humiliating or offensive climate.

2.1.1 Harassment

This Policy considers harassment to be unwelcome behaviour that is systematic and prolonged against a person, and has a persecutory aim, that can create a work environment which is not respectful, is humiliating or harmful to the physical and mental wellbeing of the person or his/her dignity.

Examples of harassment are:

- a) being offensive, intimidating, making false accusations, insults, propagating confidential information, making insinuations about psychological or physical problems, as well as any other action that discredits the person;
- b) any form of harassment based on religious belief, ideological beliefs, racial origin, skin colour, place of origin, civil status (cohabitation or civil partnerships), ancestry (including ethnic origin), pregnancy and motherhood, status as a victim of domestic abuse, sexual crimes or stalking, belonging to any other category protected by law in the local jurisdiction.

2.1.2 Sexual harassment and sexually inappropriate behaviour

This Global Policy also prohibits sexually-related harassment, harassment with sexual connotations and sexually inappropriate behaviour.

Sexual harassment and sexually inappropriate behaviour are sexually-related discriminations and, as such, violate the principle of the equal treatment of men and women. Less favourable treatments regarding a colleague who has reacted against sexual harassment or sexually inappropriate behaviour is also considered as discriminating

Sexual harassment or sexually inappropriate behaviour is always prohibited, regardless of the gender and gender identity of the offender and the receiving person or regardless of the offender is a colleague, line manager or any other person the Employee interacts with for work reasons. Similarly, any type of harassment or discrimination based on the sexual orientation, sexual identity and gender identity of a person, whether homosexual, transsexual, bisexual or intersexual, is prohibited.

Based on the situation and context, behaviour which in itself is not specifically prohibited by law (such as hints, jokes, comments based on sexual stereotypes) may be considered as harassment.

In the work environment, harassment and sexually inappropriate behaviour is particularly serious when it can influence, explicitly or implicitly, decisions concerning employment and professional development.

Examples of sexual harassment or sexually inappropriate behaviour:

- a) *Avances* or sexual offers that are offensive or unwanted.
This category includes gestures and jokes with sexual overtones, provocation, vulgar or unseemly winking, verbal remarks about the body or offensive comments about sexuality or sexual orientation;
- b) the display or publication of pornographic material or material with a content that is sexually degrading in the workplace, also digitally, by sharing the material on computer or smartphones;
- c) adopting sexist criteria in interpersonal relations.
This category includes hostile behaviour against an individual because of her/his gender, sexual orientation, gender identity or transsexual status;
- d) implicit or explicit promises of help and benefits or career advancement in exchange for sexual favours;
- e) threats or retaliation following the refusal of sexual favours;
- f) any proposal of a sexual nature, if the outcome has implications for any work decision;
- g) any behaviour that makes employment, remuneration or career opportunities a condition of any type of sexual activity.

2.2 Bullying

Bullying means repeated verbal or physical conduct of a threatening, intimidating or humiliating nature, the sabotage of or harm to a person's work.

Bullying harms personal and professional dignity and creates a hostile work environment. Typical examples include both evident and insidious behaviour, including provocation, stifling conduct, marginalisation, humiliation, insults, false accusations, physical and verbal aggression, ostracism, bullying or sexually inappropriate behaviour.

3 REPORTING PROCESS

To protect people, the work environment and Group's reputation, it is fundamental for all Employees to report any harassment, bullying or sexually inappropriate behaviour. The Group therefore considers to be extremely important the reporting of such behaviour, the supporting for any victims or witnesses and their protection from possible retaliation .

An employee, who has experienced harassment, bullying or sexually inappropriate behaviour, is requested to report the incident:

- through the channels indicated in the Whistleblowing procedure in place at their Group Company;
- to the Human Resources Department (or another relevant function) of their own Group Company.
- to their direct superior or, if this person is involved, to their line manager, based on relevant reporting lines, who in turn will involve the Human Resources Department of their Group Company; or
- through any other channel available and in use at their Group Company.

Reporting pursuant to this Global Policy does not exclude or limit in any way the Employee's right to contact the competent authorities.

As soon as it is informed of an incident of harassment, sexually inappropriate behaviour or bullying, the relevant function of the Group company concerned further investigates and promptly and impartially manages the reported incident. The Group will take all necessary measures to guarantee confidentiality and discretion as regards the reporting. Pursuant to this Global Policy, employees must collaborate.

In this regard, the Group is committed to creating a work environment in which each Employee feels protected and free to report incidents as necessary, without fear of being exposed to retaliation.

If an Employee is victim of a behaviour that is prohibited by this Global Policy, the Group requires the circumstance to be reported, reassuring the Employee that this reporting will be followed up with respect and the employee will not be subject to intimidation or retaliation.

4 COMMITMENT AND GENERAL PRINCIPLES

The Group is committed to promoting equal opportunities for all Employees and to notifying, adopting and implementing this Global Policy in all Group Companies. Fineco is committed to transferring the principles of this policy also to Third Parties.

5 BAN ON ACTS OF RETALIATION

The Group is strongly committed to protecting Employees who report a conduct that violates this Global Policy from any acts of retaliation, for the entire time necessary.

Therefore, to protect its Employees from acts of retaliation, the Group is committed to promoting an environment where Employees:

- i) feel at ease when communicating in an open and honest way;
- ii) are encouraged to report any problem promptly and in good faith concerning situations they may consider to be unethical, fraudulent or unlawful, without fear of retaliation;
- iii) are encouraged to report problems concerning them in good faith, also in cases where they do not have obvious proof.

An act of retaliation means behaviour against a person based on the fact that the person:

- has reported an actual or perceived violation of a Group regulation or law, or has reported behaviour that is prohibited or inappropriate in the workplace; and/or
- has been against a conduct that could violate a Group regulation or law or other behaviour that is prohibited or inappropriate in the workplace and/or
- has taken part in the reporting and investigation process of Group regulations and/or
- has supported an investigation or proceedings concerning an actual or perceived violation of a Group regulation.

Anyone who retaliates against an Employee or Third Party reporting an incident, or who offers financial

or other benefits to them to keep quiet, will be subject to disciplinary proceedings. Retaliation is strictly prohibited and is in itself a violation of this Global Policy.

6 DISCIPLINARY ACTIONS

The violation of provisions in this Global Policy, and its principles and values, as well as applicable regulations, may result in disciplinary proceedings being started, with disciplinary measures taken against the Employee responsible, in proportion to the severity of the conduct, that may even lead to dismissal.

7 REPORTING

Each Group Company is required to report to its governance boards annually on the reporting indicated in this Global Policy. Each Group Company will send FinecoBank a periodic report containing anonymous cases and trends of reporting received in the reference period by email [REDACTED]@[REDACTED]