



Approving Function	Board of Directors	Date
Proposing Function	CFO Department - Sustainability	December 2020

This is an English translation of the original Italian document. The original version in Italian takes precedence

GLOBAL POLICY
ENVIRONMENTAL POLICY
FINECOBANK GROUP
FB 068 - 2020



ENVIRONMENTAL POLICY

FINECOBANK GROUP

1. FOREWORD

FinecoBank Group's mission is to provide top quality services and products at *fair pricing*, committing to do business in an innovative, efficient and transparent way - inherent to the identity of all the Group's companies - and with the will to integrate, in an increasingly structured way, the economic, environmental and social sustainability objectives in its short, medium and long term strategy.

Within FinecoBank's Code of Ethics, which is the cornerstone of the Organisation and Management Model adopted pursuant to Legislative Decree no. 231/2001,

Environmental Protection is a key principle, aimed at guaranteeing full and substantial compliance with environmental legislative requirements in all the activities carried out. The reporting of environmental impacts is an integral part of the obligations implemented through the Non-Financial Statement prepared pursuant to Legislative Decree no. 254/2016.

In this framework, the Parent Company has adopted the Environmental Management System in line with the EMAS standard of excellence (Reg. no. 1221/2009/EC), as the main tool to implement the environmental principles and commitments, endorsed and formalised through this *Environmental Policy*.

2. GLOSSARY AND DEFINITIONS

PAROLA CHIAVE	DEFINIZIONE
Parent company	FinecoBank S.p.A. (hereinafter also "FinecoBank", "Fineco" or the "Bank")
Subsidiary	Entity directly or indirectly controlled by FinecoBank S.p.A. (hereinafter also "Subsidiary Entity", or "Subsidiary Company" or "LE")
Group Companies	Companies of the FinecoBank Group, which is the Parent Company FinecoBank and its Subsidiaries
Group	Fineco Group, consisting of FinecoBank S.p.A. and the Group Companies (hereinafter also "Fineco Group")
ESG	Environmental, Social and Governance
SRI	Socially Responsible Investors

3. PURPOSE AND SCOPE

The Environmental Policy applies to all the activities carried out by FinecoBank Group, in Italy and abroad, and is structured through the definition of a series of General principles - which express the organiza-

tion's guidelines and orientations - and of Main areas of intervention, which constitute the framework for establishing specific environmental objectives and targets, in the pursuit of continuous improvement of our environmental performance.

■ 4. BASIC PRINCIPLES

As a financial institute, the Group through all its structures is aware of the crucial role it plays in the transition towards a sustainable, low-carbon and climate-resilient economic model. In addition to ensuring compliance with current environmental legislation and limiting the impacts generated by its operations according to a logic of continuous improvement, the Group is committed to promoting and supporting this transition through the integration of ESG criteria in its internal investment policies as well as in the range of products and services it offers.

The protection of the environment, meeting compliance obligations, the adoption of tools and operating

methods aimed at limiting the consumption of natural resources, preventing and mitigating risks related to the environment and reducing the impacts that could arise from the Group's activities are objectives that must be pursued along the entire value chain - from procurement decisions to the operations of the financial advisor network - in line with the environmental commitments arising from signing the United Nations' Global Compact Principles.

The involvement of personnel and the network of financial advisors, through initiatives aimed at spreading awareness of the role and contribution that each individual can make to improve the Company's environmental performance, is a further element underpinning the Group's commitment.

■ 5. MAIN AREAS OF INTERVENTION

Through the Environmental Management System, FinecoBank intends to implement its strategies and pursue concrete improvement objectives in the following areas:

- **Responsible Finance** - credit products with an environmental value, ESG assessment of the funds on the FinecoBank platform, coverage of green and social bonds within the FinecoBank portfolio

- **Supply chain** - assessment of suppliers also based on ESG criteria
- **Shareholders** - strengthening dialogue with Socially Responsible Investors (SRI) and Sustainability Rating Agencies
- **Environmental impacts** - reduction of energy consumption and emissions, initiatives to support sustainable travel for employees, responsible consumption of paper and plastic.

■ 6. ADOPTION AND DISTRIBUTION

FinecoBank intends to use and distribute this Group Policy so that it constitutes the reference framework for establishing objectives and improvement pro-

grams and is a tool for transparency and dialogue with all Stakeholders. For this reason it is distributed to all personnel of all Group Companies and to financial advisors, and is made available to the public, clients, investors, regulators and suppliers of products and services through the institutional website.

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