



Global Policy

FinecoBank Group Environmental Policy

FB 069_2024

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1. FOREWARD

FinecoBank S.p.A., as Parent Company - in accordance with applicable laws and regulations¹ and in line with the Group's managerial coordination system as defined by the Group Managerial Golden Rules - issues guidelines in the interest of the Group's stability to fully exercise its management and coordination role.

This document integrates the Group's regulatory framework, is directly applicable to the Parent Company², and is addressed to the Group's companies.

As outlined in the Global Policy for Group Regulatory Management, this document will be adopted in compliance with local applicable requirements and regulations. In the event of any conflict between this Global Rule (hereinafter also referred to as GR) and applicable local law (or in the case of stricter provisions), the latter shall prevail.

After the approval by Fineco's designated bodies, the Parent Company transmits the GR to the recipient companies for approval by their respective corporate bodies and monitors its proper and timely implementation, also leveraging on its internal functions identified on a case-by-case basis.

The Group's Companies are therefore required to promptly start—following appropriate evaluation and approval by their competent bodies—the necessary activities to ensure proper application of this document.

Should a Company consider:

- this Global Rule not applicable, or
- if necessary, to introduce amendments/exceptions to the provisions contained in this Global Rule,

to comply with stricter local regulations or due to organizational and operational constraints, the Company, pursuant to the applicable Group regulation (Group Regulatory Management), must submit a request for a Non-Binding Opinion (NBO) to the Chief Financial Officer Department of the Parent Company.

¹ Internal and external regulations in force on the date of issue of this document; subsequent updates, where applicable from time to time.

² In case of divergence between the Responsibilities of the Parent Company indicated in this regulation and those reported in the Regulations of the Corporate Bodies, Articles of Association, Internal Regulations, Delegated Powers of FinecoBank in force from time to time, the latter always prevails.

2. GLOSSARY AND DEFINITIONS

Keyword	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 Entity" or "Subsidiary" or "Entity" or "Legal Entity" in short "LE").
Group	FinecoBank Group, made of FinecoBank S.p.A. and by the Subsidiaries/ Legal Entities of the Group del Gruppo (hereinafter also "Fineco Group" or "FinecoBank Group").
ESG	Environmental, Social and Governance.
Management Representative	Management Representative pursuant to EMAS Regulation no. 1221/2009/EC, identified in the FinecoBank Group, for the purposes of this regulation, in the Chief Financial Officer of Group's Parent Company.
CSRD	Corporate Sustainability Reporting Directive.
ESRS	European Sustainability Reporting Standards.
Environmental Aspect	An element of the activities, products and services of an organisation that has or may have an environmental impact ³ .
Double Materiality Analysis	Process for determining the relevance of a sustainability matter. The double materiality has two dimensions: the impact materiality and the financial materiality. A sustainability matter meets the criterion of double materiality if it is material from the impact perspective or the financial perspective or both ⁴ .

³Regulation (EC) no. 1221/2009 of the European Parliament and of the Council of 25 November 2009 on the voluntary participation of organizations in a community eco-management and audit scheme (EMAS), which repeals Regulation (EC) no. 761/2001 and Commission Decisions 2001/681/EC and 2006/193/EC, Article 2, Definitions.

⁴ 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 the ESRS.

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. The impacts can be actual or potential, negative or positive, intended or unintended, and reversible or irreversible. They can arise over the short-, medium-, or long-term. Impacts indicate the undertaking's contribution, negative or positive, to sustainable development ⁵ .
Material risks	Sustainability related risks with negative financial effects that materially affect (or could reasonably be expected to affect) the undertaking's cash flows, access to finance, or cost of capital over the short, medium or long term ⁶ .
Opportunities	Sustainability-related opportunities with positive financial effects ⁷ .
Value Chain	The full range of activities, resources and relationships related to the undertaking's business model and the external environment in which it operates. A value chain encompasses the activities, resources and relationships the undertaking uses and relies on to create its products or services from conception to delivery, consumption and end-of- life ⁸ .

3. PURPOSE AND SCOPE

The document aims to define the general guidelines and orientations of the organization regarding the Environment and the related main areas of intervention, which constitute the reference framework for establishing specific environmental objectives and goals, in the pursuit of the continuous improvement of the environmental performance.

The mission of the Group FinecoBank is to provide services and products of the highest quality at fair pricing, committing itself to doing business in an innovative, efficient and fair way – embedded in the identity of all the companies in the Group - and with the will to integrate, more and more structured way, the targets of economic, environmental and social sustainability in the short-, medium- and long-term strategy.

⁵ Ibidem.

⁶ Ibidem.

⁷ Ibidem.

⁸ Ibidem.

As part of the FinecoBank Code of Ethics, a key element of the Organization and Management Model adopted pursuant to Legislative Decree no. 231/2001, the Environmental Protection represents a key principle, aimed at guaranteeing full and substantial compliance with environmental legislative requirements in all the activities.

The reporting of the Group's impacts, risks and opportunities from an environmental perspective is an integral part of the obligations which are implemented through the Group's sustainability reporting present in the Consolidated Financial Statement and prepared according to the legislation in force from time to time⁹ on corporate sustainability reporting (Corporate Sustainability Reporting Directive, hereinafter CSRD). FinecoBank's environmental performance is also subject to reporting through the drafting of the Environmental Statement pursuant to EMAS Regulation no. 1221/2009 of 25 November 2009 of the European Union on the voluntary participation by organisations in a Community eco-management and audit scheme.

In this framework, this Environmental Policy applies to all activities carried out by the Group, in Italy and abroad, with relevance to its own activities and relationships with the actors in the value chain.

The document is divided into the definition of a series of general Principles - which express the directions and orientations of the undertaking - and main Areas of intervention, which represent the reference framework for establishing specific environmental targets and goals, in the pursuit of ongoing improvement of the environmental performance. In the definition of the Policy and its periodic updates, the interests and needs of the key Stakeholders are taken into account: the feedback collected during the assessment of the Double Materiality helps to guide and enrich the targets and contents of the policy.

The Parent Company has adopted the Environmental Management System compliant with the EMAS standard of excellence (Reg. no. 1221/2009/EC) as the main tool for implementing the environmental principles and commitments, signed and formalized through this Environmental Policy.

4. MAIN PRINCIPLES

As a financial institution, the Group, through all its structures, is aware of the defining role played in the transition towards a sustainable economic model, with low carbon emissions and resilient to the climate changes. In addition to ensuring compliance with the current environmental legislation and containing the impacts generated by 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 internal investment policies as well as in the in the range of products and services it offers.

⁹ Upon the issuance of this legislation: Legislative Decree no. 125/2024. Legislative Decree no. 125/2024 which implements Directive 2022/2464/EU into Italian law.

The protection of the environment, the abiding with the compliance obligations, the adoption of tools and operating methods aimed at containing the consumption of natural resources, at preventing and mitigating the risks connected to the environment and at reducing the impacts that could derive from the activities of the Group are targets that must be pursued along the whole value chain - from choices of procurement to the activities of the network of financial advisors – consistently with environmental commitments coming from the signing of the *Global Compact (GC) Principles* and the *Principles For Responsible Banking (PRB)* of the United Nations.

The involvement of the people and of the network of financial advisors, through initiatives aimed at spreading the awareness of the role and of the contribution that everyone can make to improving the Company's environmental performance, is a further element underlying the Group's commitment.

5. ROLES AND RESPONSIBILITIES

The structures and bodies involved are indicated below detailing their main attributions of commitments regarding environmental policies, briefly and without prejudice to the tasks assigned to by the legislation in force, by the Corporate Bodies Regulations and by the further internal laws, in force from time to time.

The Board of Directors of the Parent Company:

- assesses and approves the principles and the guidelines needed for setting the Environmental Policy, defined by the relevant structures, following the consultation with the Corporate Governance and Environmental and Social Sustainability Committee;
- guarantee, with the support of the relevant committee, that the Environmental Policy is defined and consistent with the strategic guidelines and the context of the undertaking;
- approves the Environmental Policy

The Corporate Governance and Environmental and Social Sustainability Committee:

- examines and, if necessary, formulates proposals regarding the Group's Environmental Policy, monitoring its implementation over time;
- examines in advance the Environmental Policy to be submitted for approval by the Board of Directors or by the relevant delegated body from time to time.

The Representative of the CFO Department:

- verifies, with the support of the Structure of Sustainability, the contents of the Environmental Policy on the basis of the Group's environmental commitments and the requirements of the EMAS Regulation and of the legislation on sustainability reporting in force from time to time;

- submits the Environmental Policy and any updates to the Corporate Governance and Environmental and Social Sustainability Committee, and then to the Board of Directors;
- monitors, with the support of the Structure of Sustainability, the distribution of the Environmental Policy inside the undertaking and outside of it.

The Sustainability Structure of the Parent Company:

- develops the Environmental Policy;
- identifies the needs of periodic updates of the Environmental Policy;
- identifies the appropriate ways of circulating the Environmental Policy inside the undertaking and outside of it, liaising with the relevant company's structures;
- guarantees the distribution of the Environmental Policy inside the undertaking and outside of it;
- manages and archives the whole documentation.

The Group's Subsidiaries are required to:

- submit the Environmental Policy for approval by its relevant approving body/function;
- implement the Environmental Policy with the local law – through the designated function of each Subsidiary – or set up a plan for the implementation of the needed intervention, pursuant to the relevant function of the Parent Company.

All the Group's employees are required to meet the general orientation principles established by the Environmental Policy.

6. MAIN AREAS OF INTERVENTION

The Group FinecoBank intends to implement its strategies and pursue tangible environmental targets, formulated considering:

- the **material impacts, risks and opportunities** defined and periodically updated as part of the process of Double Materiality carried on annually with reference to the consolidated sustainability reporting of the FinecoBank Group as required by current legislation on the matter, which includes the interests of the main Stakeholders;
- the **material environmental aspects** defined and periodically updated as part of the process of Environmental review compliant with the requirements of the EMAS Regulation.

In this context, the **following main areas** of intervention can be identified:

- **Environmental impacts**, with particular reference to Energy, Mitigation and Adaptation to Climate Change¹⁰, the Use of Resources and the Circular Economy¹¹. The Group is committed to reducing energy consumption and emissions into the atmosphere, through the Net-Zero Emissions Commitment by 2050, which also involves the actors in the value chain and includes the alignment of the assets with the targets of the Paris Agreement. There are also initiatives defined and implemented to support the sustainability of travel for employees and to optimize the use of resources, also through the adoption of digital solutions.
- **Supply Chain**, through strengthening the environmental protection in the supply chain; the selection and promotion of the use of products that protect the environment, the development of knowledge and skills in green and sustainable procurement.
- **Sustainable Finance**¹², through the ESG integration in the offer of products and services, in the investment decisions, and through the stronger involvement of the Network of financial advisors in the ESG-related strategies.

The impacts, risks and opportunities identified and connected to these areas are at the centre of the corporate strategies aimed at reducing the environmental impact, promoting the efficient use of resources, contributing to the development of sustainable finance through ESG integration in the investment choices and in the governance.

7. ADOPTION AND DISTRIBUTION

FinecoBank intends to use and distribute this Group's Global Policy so that it represents the reference framework for establishing targets and improvement programs and is a tool from transparency and dialogue with all the Stakeholders. For this reason, it is distributed to all personnel of the Group's companies and to the financial advisors and it is made available to the public, clients, investors, regulators and suppliers of products and services through the institutional website.

¹⁰ ESRS E1 – Climate Change.

¹¹ ESRS E5 – Resource Use and Circular Economy.

¹² The Sustainable Finance is an entity specific topic for the Group pursuant to the CSRD.