



## **Local Policy**

# **Occupational Health and Safety**

---

<b>Approving function</b>	Board of Directors	<b>Date</b> November 2024
<b>Proposing Function</b>	Chief People Officer Department – Real Estate – Procurement Office	

---

## **REGISTRY**

<b>Owner</b>	People Officer Department - Real Estate – Procurement Office	
<b>Contacts</b>	<b>Clarification of document contents</b>	<p>Structure: People Officer Department email: <a href="mailto:risorseumane@fineco.it">risorseumane@fineco.it</a></p> <p>Structure: Real Estate email: <a href="mailto:reprevention@fineco.it">reprevention@fineco.it</a></p> <p>Structure: Procurement Office email: <a href="mailto:Procurement@fineco.it">Procurement@fineco.it</a></p>
	<b>Operational assistance</b>	<p><a href="mailto:risorseumane@fineco.it">risorseumane@fineco.it</a></p> <p><a href="mailto:reprevention@fineco.it">reprevention@fineco.it</a></p> <p><a href="mailto:Procurement@fineco.it">Procurement@fineco.it</a></p>
<b>Parent company functions involved in the sharing process</b>	Bank Organisation and Operations	

## **Replaced/revised regulations and main changes made**

<b>Replaced/revised regulation</b>	<b>Date of replaced/revised regulation</b>	<b>Rationale/Summary of main changes</b>	<b>Type of change</b>
-	-	-	First release

## **Related Group and Local Regulations<sup>1</sup>**

<b>Title</b>	<b>Number</b>	<b>Brief explanation of the link</b>
Management of Contracts in the area of occupational health and safety (Legislative Decree 81/08 as amended)	Circ_21_09_2022_153	The Circular governs the operating procedures for managing contracts that must be followed in the area of occupational health and safety (Legislative Decree 81/08 as amended).
Circular on Occupational Health and Safety – roles and responsibilities	Circ_24_10_2023_163	The Circular defines the roles and responsibilities that corporate structures have in the activities connected with the obligations set forth in Legislative Decree 81/2008.
Circular with Update to the role and duties of the Contract Manager	Circ_23_09_2024_13	The Circular governs the role of the Contract Manager in assessing any impacts on occupational health and safety, when signing new contracts with Third Parties.
CPO Decision Protocol  Global Banking Services Decision Protocol	Prot. no. 01  Prot. no. 06	The Decision Protocols govern the principles of conduct and principles of control relating to occupational health and safety.
Process for the Management of activities and interventions at properties used by FinecoBank	3040	The Process governs the operating methods for managing activities and interventions at properties in use, in the event of impacts attributable to Legislative Decree 81/08.

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

## Contents

1	INTRODUCTION .....	5
1.1	<b>Purpose of the document</b> .....	<b>5</b>
1.2	<b>Glossary and Definitions</b> .....	<b>6</b>
1.3	<b>External regulations</b> .....	<b>6</b>
2	PRINCIPLES AND RULES .....	7
2.1	<b>General principles</b> .....	<b>7</b>
3	ROLES AND RESPONSIBILITIES .....	7
3.1	<b>the Employer</b> .....	<b>8</b>
3.2	<b>The Employer's Representatives</b> .....	<b>8</b>
3.3	<b>The Health and Safety Officer (RSPP)</b> .....	<b>8</b>
3.4	<b>Senior Officers (pursuant to Legislative Decree 81/2008)</b> .....	<b>9</b>
3.5	<b>Supervisors</b> .....	<b>9</b>
3.6	<b>Workers' Safety Representatives (RLS)</b> .....	<b>9</b>
3.7	<b>The Company-appointed Coordinating Doctor and Company-appointed Doctors</b> .....	<b>9</b>
3.8	<b>Workers</b> .....	<b>9</b>
3.9	<b>Emergency Responders</b> .....	<b>10</b>
3.10	<b>Internal responsibilities of the Bank's structures</b> .....	<b>10</b>
4	ASSESSMENT OF WORKPLACE RISK .....	11
5	EMERGENCY MANAGEMENT .....	11

# 1 INTRODUCTION

This document integrates the internal regulations of FinecoBank, and is adopted in compliance with requirements and regulations in force; In the event of any conflict between this document and applicable local law (or more restrictive provisions), the latter prevails.

FinecoBank acts according to the following principles in order to guarantee the effectiveness of its actions in the area of Health and Safety, fully integrating them into the global strategies of the Company. FinecoBank guarantees full compliance with legislative provisions on Occupational Health and Safety aimed at preventing possible accidents and harm to health in any way related to the performance of work. Awareness and participation in Health and Safety policies and objectives, as well as training and information on risks and control measures adopted, are considered essential tools to achieve expected results and improve the wellbeing of staff, in a safe and healthy environment.

The Policy, to be considered an integral part of the Organisation Model pursuant to Legislative Decree 231/2001, confirms Fineco's commitment, with a view to continual improvement, to protecting the Health and Safety of its Staff, both internally (Workers) and externally (suppliers, associates, etc.).

In order to guide the policy and actions on Occupational Health and Safety and make them effective, the Chief Executive Officer and General Manager (in a capacity as the Employer) has assigned specific powers and responsibilities with the aim of:

1. adopting the principles, rules and best practices in order to progressively eliminate the health and safety risks for workers that have been detected, or reduce them as far as possible;
2. raising awareness throughout the organisation of Health and Safety policies and objectives, through appropriate training and information initiatives and developing knowledge and fostering a robust internal health and safety culture;
3. adopting appropriate prevention and protection measures and verifying their adequacy and effectiveness;
4. promoting initiatives to improve the quality of workplaces, with the aim of achieving a better wellbeing for workers;
5. recognising the central role of each Worker, in person and/or through their Representatives, in health and safety initiatives;
6. ensuring an attentive selection, qualification, management and control of suppliers, also in terms of adopting the best Health and Safety standards, promoting the exchange and dissemination of best practices for the reduction of accidents and incidents;
7. informing Workers and their representatives about Health and Safety objectives, in order to ensure a transparent dialogue aimed at promoting the principles within and outside the organisation.

## 1.1 Purpose of the document

The purpose of this document is to define FinecoBank's commitment to managing Occupational Health and Safety and to pursue continual improvement in this area.

The principles referred to in this Policy are therefore implemented in the internal reference regulations in force from time to time, which set out the tasks, operational and control activities necessary to guarantee timely compliance with regulatory requirements and full control of the processes themselves.

## 1.2 Glossary and Definitions

Keyword	Definition
Parent Company	FinecoBank S.p.A. (hereinafter also 'Fineco')
Group subsidiary	Company directly or indirectly controlled by FinecoBank S.p.A. (hereinafter also 'Subsidiary Entity' or 'Subsidiary Company' or in brief 'LE')
Group Companies	FinecoBank Group Companies, meaning the Parent Company FinecoBank itself and its Subsidiaries.
Group	FinecoBank Group, consisting of FinecoBank S.p.A. and the Group Companies (hereinafter also the 'Fineco Group')

## 1.3 External regulations

- Legislative Decree no. 81/2008 as amended
- National Collective Bargaining Agreement for middle managers and staff in professional areas employed by credit, financial and operating companies.
- National Collective Bargaining Agreement for senior executives employed by credit, financial and operating companies.
- Legislative Decree 231/2001

## 2 PRINCIPLES AND RULES

### 2.1 General principles

In accordance with regulations in force, FinecoBank is committed to protecting its workers. All workers are required, in relation to their own roles and responsibilities, to strictly observe the contents of this Policy, the procedures related to it and the safety directives for the performance of their work.

Based on the authorised powers in paragraph 1, FinecoBank also identifies areas of responsibility, with reference to promoting Occupational Health and Safety.

In particular, FinecoBank:

- has set up its own effective organisational structure and is committed to maintaining it over time in line with developments in its work-related context;
- carries out all activities relating to Occupational Health and Safety in compliance with applicable legal requirements, regulations and directives (national and EU);
- adopts, in the management of issues relating to Occupational Health and Safety, an approach aimed at eliminating risk and in any case inspired by its prevention, pursuing the objective of the continual improvement of the context;
- is committed to ensuring that responsibilities and awareness concern the entire organisation, starting from top management, through a correct distribution of tasks among the various organisational and operational roles.

## 3 ROLES AND RESPONSIBILITIES

In order to define roles and responsibilities<sup>2</sup> in the field of Health and Safety, FinecoBank S.p.A. has put in place operational procedures, as well as processes and adequate resources, also economic, to implement strategies aimed at achieving high health, safety and environmental standards in the workplace.

To this end, the CPO Department has drawn up an internal communication/Circular on “Occupational health and safety - Roles and responsibilities” intended for the Bank’s Workers, to which reference is made for operational and process details.

The Circular identifies the following positions:

- the Employer
- the Employer’s Representatives
- the Health and Safety Officer (hereinafter also referred to as the ‘RSPP’)
- Senior Officers (pursuant to Legislative Decree 81/2008)
- Supervisors
- Workers’ Safety Representatives (hereinafter also referred to as ‘RLS’)
- the Company-appointed Coordinating Doctor and Company-appointed Doctors
- Workers
- fire officers and first aid responders

---

<sup>2</sup>In the event of a discrepancy between the Responsibilities of the Parent Company set out in this regulation and those in the Regulation of the Corporate Bodies, Articles of Association, Internal Regulations and Delegated Powers of FinecoBank in force from time to time, the latter always prevail.

### 3.1 the Employer

According to Article 2, paragraph 1, letter b) of Legislative Decree 81/2008, the Employer is *"the person that has a relationship of relationship with the worker or, in any case, the person who, according to the type and structure of the organisation in which the worker carries out his/her activity, has responsibility for the organisation itself or for the production unit, in that he/she exercises decision-making and spending powers"*.

The Employer has the obligation to guarantee the health and safety of Workers, as also specified in Article 2087 of the Italian Civil Code, performing a management, supervision and control role for occupational safety matters in the company. In fact the Employer is the main 'watchdog' identified by legislation.

The Chief Executive Officer and General Manager has been identified as the Employer.

### 3.2 The Employer's Representatives

The Employer's Representatives are positions that have been granted the same powers as the Employer through written and accepted authorisation, with the exception of obligations that may not be delegated as per Article 17 of the Decree (risk assessment and appointment of the RSPP).

FinecoBank has put in place a system of authorised powers consistent with the company organisation and with the system of existing functions and powers, thus aligning it with the new complexity determined by the Bank's expansion.

The system is composed of 3 "thematic" Representatives, each with specific employer responsibilities transferred by area of competence, based on their actual powers of expenditure, organisation, management and control, as described in brief below:

- Chief People Officer (CPO), for responsibilities relating to: training, information, health surveillance, nomination of the Company-appointed doctor, identification and designation of emergency workers, communications to institutional bodies (INAIL [the National Institute for Insurance against Accidents at Work], etc.);
- Real Estate Manager, for responsibilities relating to: the compliance of workplaces (Titles I, II, VIII, IX, X, XI of Legislative Decree 81/08), systems, machinery and equipment, maintenance and updating of mandatory legal documentation, identification of uncovered emergency staff positions, verification of the technical and professional suitability of contractors, drafting of the DUVRI (Report on the Assessment of Risks from interference) and calculation of safety costs, authorisation of subcontracting;
- Procurement Office Manager, for responsibilities relating to: the identification of the scope of application of Article 26 and Title IV of Legislative Decree 81/2008, the identification of suppliers and issue of orders.

### 3.3 The Health and Safety Officer (RSPP)

The Head and Safety Officer is *"the person with the professional skills and requisites referred to in Article 32 of Legislative Decree 81/08 designated by the Employer, to whom he or she reports, that coordinates the risk prevention and protection service"* (Article 2, paragraph 1, letter f of Legislative Decree 81/08).

In general, the main tasks of the RSPP are to work with the Employer and with all subjects



delegated by the latter or otherwise concerned (within or outside the company) for the identification and assessment of risk factors and the definition of relative prevention and protection measures in relation to all risks occurring during the performance of work, as well as for the preparation of and updates to the risk assessment document in cooperation with the Company-appointed Doctor, for areas in their responsibility.

### **3.4 Senior Officers (pursuant to Legislative Decree 81/2008)**

Senior Officers pursuant to Legislative Decree 81/2008 are persons who *"by virtue of their professional skills and hierarchical and functional powers appropriate to the nature of the assignment conferred upon them, implement the directives of the Employer by organising the work activity and supervising it"* (Article 2, paragraph 1, letter d of Legislative Decree 81/08). The Senior Officers pursuant to Legislative Decree 81/2008 at FinecoBank are the three Representatives of the Employer.

### **3.5 Supervisors**

*"The Supervisor is the person who, by virtue of his or her professional skills and within the limits of the hierarchical and functional powers appropriate to the nature of the assignment conferred upon him or her, supervises the work activity and ensures the implementation of the directives received, checking their correct adoption by workers and exercising a functional power of initiative"* (Article 2, paragraph 1, letter e of Legislative Decree 81/08).

Supervisors represent the first point of reference for workers and therefore are those people who must first and foremost deal with the actual protection of the health and safety conditions of all workers present, both by monitoring their activity and, obviously, by refraining from requesting unsafe actions.

The Occupational health and safety supervisors at FinecoBank are the Department, Unit and Team Managers, as per the organisational chart in force from time to time.

### **3.6 Workers' Safety Representatives (RLS)**

The Workers' Safety Representative *"is the person elected or designated to represent workers with regard to aspects of health and safety at work"* (Article 2, paragraph 1, letter i of Legislative Decree 81/08).

The Workers' Safety Representatives at FinecoBank are responsible for Work Places, regardless of where they perform the service.

### **3.7 The Company-appointed Coordinating Doctor and Company-appointed Doctors**

The Company-appointed doctor is the doctor with the qualifications and training and professional requisites referred to in Article 38, who works with the Employer, as per Article 29, paragraph 1 of Legislative Decree 81/08, for the purposes of the risk assessment and is appointed to carry out health surveillance and all other tasks referred to in Legislative Decree 81/08. (Article 2, paragraph 1, letter h).

FinecoBank has a Company-appointed Doctor tasked with coordinating two, local Company-appointed Doctors.

### **3.8 Workers**

Workers are persons who *"regardless of the type of contract, carry out a work activity within*

*the organisation of a public or private employer, with or without remuneration, even for the sole purpose of learning a trade, an art or a profession, excluding those employed in domestic and family services." (Article 2, paragraph 1, letter a) of Legislative Decree 81/08).*

Each Worker must receive adequate training and information on health and safety risks at work and must contribute, together with the Employer, Senior Officers and Supervisors, to meeting the obligations required to protect health and safety in the workplace.

Workers must also observe the provisions and instructions given by the above persons, for the purposes of collective and individual protection.

### **3.9 Emergency Responders**

A Company Emergency is any circumstance or event that deviates from normal operating conditions, which occurs in the workplace and which may cause the interruption of work activity, accidents and/or psychological or physical harm to those present.

To manage such circumstances, specific actions have been prepared, observing current legislation, which take into account the different types of emergency with the aim of safeguarding people, property and the environment through the implementation of measures contained in company Emergency Plans.

These measures concern in particular:

- the drafting of emergency management procedures;
- the identification, appointment and training of persons responsible for emergency management (first aid and fire prevention);
- the provision of fire prevention and first aid equipment.

### **3.10 Internal responsibilities of the Bank's structures**

FinecoBank:

► through the CPO structure of the Parent Company:

- also monitors, in agreement with the Company Prevention and Protection Service, the detection of typical parameters of work-related stress conditions;
- identifies, together with the Managers of the Organisational Units involved, the new members of the emergency teams;
- complies with the information, training and education obligations set out in Articles 36 and 37 of Legislative Decree 81/08;
- nominates the Company-appointed Doctor and plans the schedule of medical tests for personnel exposed to risk;
- liaises with the Workers' Safety Representatives (RLS);

► through the Real Estate structure of the Parent Company:

- defines and updates design standards in accordance with health and safety regulations;
- checks that the workplace meets the health and safety requirements of current legislation, and in particular Title II of Legislative Decree 81/08, as well as Titles VIII, IX, X, XI of the same Decree;
- checks that the designers of workplaces or stations and systems comply with the general principles of safety and health when making design and technical choices and choose machinery and protective devices that meet the essential safety requirements set out in legislative and regulatory provisions (including technical standards) in force;

- checks that installers and assemblers of systems, equipment or other technical items comply, for areas under their responsibility, with occupational health and safety regulations, as well as with the instructions provided by respective manufacturers;
- checks compliance with current legal provisions on escape routes, emergency exits, doors, main entrances and ensures the suitability of internal and external transit routes leading to exits or emergency exits;
- adopts necessary measures for the purposes of fire prevention and evacuation of the workplace, as well as in the event of serious and immediate danger;
- provides workers with the necessary and suitable personal protective equipment, after consulting the health and safety officer and company-appointed doctor;
- carries out and updates checks on the technical-professional suitability of contractors and self-employed workers in relation to the works to be assigned by a tender or by a work or supply contract, drawing up, where required, with the support of the RSPP, the DUVRI, attaching it to the procurement, work or supply contracts;
- Indicates in the procurement, work or supply contracts the safety costs, in agreement with the supplier, arising from the adoption of the measures set out in the DUVRI.

► through the Procurement Office structure of the Parent Company:

- classifies, together with Real Estate, contracts which have been signed, in order to determine the applicability of occupational health and safety regulations pursuant to Article 26 of Legislative Decree 81/08 (obligations connected with procurement, work or supply contracts) and Title IV of Legislative Decree 81/08 (obligations connected with temporary or mobile work sites);
- identifies suppliers and contractors of services and activities;
- deals with issuing orders and contracts.

#### 4 ASSESSMENT OF WORKPLACE RISK

Workplace risks are assessed through inspections carried out every three years by the RSPP or, where necessary, more frequently, and through environmental monitoring aimed at analysing physical risks (lighting, noise and microclimate), chemical risks (air quality) and biological risks.

FinecoBank has prepared and periodically updates, through the competent structure in agreement with the three Representatives, the company's Risk Assessment Report (DVR), which contains the analysis and assessment of all health and safety risks generated by the work activities carried out by the company.

#### 5 EMERGENCY MANAGEMENT

For the purposes of managing fire emergencies, each year:

- the Emergency Plans for the Company Headquarters are prepared and maintained by the Real Estate structure;
- fire drills are organised by the Real Estate structure, based on evacuation drills;
- the outcome of these drills is reported by the RSPP and the Real Estate structure and presented to the Board of Directors and the Supervisory Body.

In the event of any critical issues, the RSPP and the Real Estate structure identify the areas for improvement and any necessary actions, which must be included in their reporting, indicating the dates and methods for solving the critical issues that have been detected.

During subsequent drills, the individual critical issues identified in previous drills must be assessed and their resolution confirmed.