BANCO BPM SHARE-BASED COMPENSATION PLAN

LONG-TERM INCENTIVE PLAN 2021-2022-2023

DISCLOSURE DOCUMENT

Prepared pursuant to article 114-bis of the Consolidated Finance Law (CFL) (Legislative Decree no. 58/1998 as amended) and article 84-bis of the Issuers' Regulation (Consob Resolution no. 11971/1999 as amended).

(This document is a translation into English of the original document. In case of any discrepancies between the English and the Italian version, the Italian version shall prevail).

DEFINITIONS

The meaning of certain terms used in this disclosure document ("**Document**") is provided below:

Banco BPM or Bank or Parent Company – Banco BPM S.p.A., the parent company of the Banco BPM Banking Group;

Subsidiaries – the companies in the Banco BPM Banking Group directly or indirectly controlled by the Parent Company;

Group – the Banco BPM Banking Group;

Policy-on-remuneration report and payouts awarded of Banco BPM Banking Group's staff – the report prepared pursuant to Supervisory Provisions, of article 123-ter of the Consolidated Finance Law (CFL) and of article 84-quater of the Issuers' Regulation;

Policy - the Remuneration policy, included in Section I of the Policy-on-remuneration report and payouts awarded of Banco BPM Banking Group's staff;

Supervisory Provisions - the Supervisory Provisions contained in the Bank of Italy Circular no. 285/2013, 25th revision, First Part, Title IV, Chapter 2 "Remuneration and incentive policies and practices";

Consolidated Finance Law (CFL) – Legislative Decree no. 58 of 24 February 1998 as amended;

Issuers' Regulation - Consob Resolution no. 11971 of 14 May 1999 as amended and supplemented;

Identified staff / Risk takers – individuals whose professional activity has, or can have, a significant impact on the Group's risk profile;

Senior identified staff - The CEO, General Manager (where appointed), Joint General Managers and senior operational and executive managers of the Parent Company, managers in the first line of management of the Parent Company not included amongst the Internal control functions reporting directly to the CEO or the Board of Directors, the CEO of Banca Aletti S.p.A. and of Banca Akros S.p.A.;

Accrual period – the period relating to financial years 2021-2023;

Award – means the granting of variable remuneration for a specific accrual period, regardless of the actual point in time when the awarded amount is paid;

Vesting – the effect by which the member of staff becomes the legal owner of the awarded variable remuneration, regardless of the instrument used for payment or the fact that the payment is subject to further retention periods or to return mechanisms;

Share allocation – the bank's commitment to an individual to award shares subject to the fulfilment of all specific conditions envisaged in the Long-Term Incentive plan (LTI);

LTI awarded – the total shares awarded to the individual beneficiary after the access gateways, the conditions and the objectives envisaged in the Long-Term Incentive plan (LTI) have been achieved, regardless of the actual time that the separate portions become vested;

Up-front portion – the portion vesting in the period immediately following the accrual period;

Deferred portions – the portions vesting in the deferral period, subject to the malus conditions;
Retention – the retention period for the shares (selling restriction) pursuant to current laws and regulations;
Malus – ex-post risk correction mechanisms, which are effective during the vesting period and which can lead to the reduction or elimination of the deferred portions.

INTRODUCTION

In accordance with the requirements of article 114-bis of the Consolidated Finance Law (CFL) and the provisions of article 84-bis of the Issuers' Regulation concerning information on share-based compensation plans that must be disclosed to the market, this Document has been prepared by the Board of Directors of Banco BPM to illustrate the three-year compensation plan (LTI plan), under which a part of the variable component of the remuneration of the Banco BPM Banking Group's top management is paid in the form of a free allocation of ordinary shares of Banco BPM, proposed as part of the Policy adopted by the Group with relation to the 2021-2023 Long-Term Incentive (LTI) plan.

The purpose of the 2021-2023 LTI Plan of the Banco BPM Banking Group is to pursue results that create long-term value for shareholders, taking into account the interests of other stakeholders that are important to the Bank.

This Document – prepared in accordance with the requirements of Schedule 7 of Annex 3A of the Issuers' Regulation – is submitted for approval to the Ordinary and Extraordinary Shareholders' Meeting held on 15 April 2021 with regard to the disclosure to the public of the criteria and conditions established for the LTI Plan.

This Document illustrates the criteria which the Board of Directors and its proxies must observe in the subsequent implementation phase of the LTI Plan.

Given its beneficiaries, the Plan is classified as "significant" pursuant to article 84-bis of the Issuers' Regulation.
This Document is available to the public at the registered office of Banco BPM, Piazza F. Meda no. 4 Milan, Italy and at Borsa Italiana S.p.A., and is also published on the website of the authorised storage platform www.emarketstorage.com and on the Banco BPM website https://gruppo.bancobpm.it (Corporate Governance section – Remuneration Policies).

Reference should be made to the 2021 Policy for any matters not included herein.

1. Beneficiaries

The LTI Plan has around 60 beneficiaries (on the date of publication of this Document) included in the scope of the Group's identified staff.

1.1 Names of beneficiaries who are members of the Board of Directors or of the Management Board of the share issuer, of the companies controlling the issuer and of the companies directly or indirectly controlled by the same.

On the date of publication of this Document, the Plan had around 60 beneficiaries. These include the individuals indicated below whose names must be disclosed pursuant to article 84-bis, paragraph 3 of the Issuers' Regulation and relative Annex 3A, Schedule 7:

1) Giuseppe Castagna - CEO of Banco BPM
2) Marco Federico Turrina - CEO - General Manager of Banca Akros S.p.A.
3) Alessandro Varaldo - CEO of Banca Aletti S.p.A.

The names of potential beneficiaries of the LTI Plan are not provided if the same receive variable remuneration in their capacity as Group employees, even though they hold positions in corporate bodies of Subsidiaries; for these individuals, please refer to the following information.

1.2 The categories of employees and non-employed staff of the share issuer, its controlling companies or its controlled companies.

In addition to the individuals listed in point 1.1. above, the LTI Plan is reserved to a limited number of positions included in the scope of the Group's identified staff and selected on the basis of the level of the position and its impact on the business.

1.3 Names of beneficiaries of the Plan who are members of the following groups:

a) general managers of the share issuer;

b) other executives with strategic responsibilities of the share issuer which is not a "small company" pursuant to article 3, paragraph 1, letter f) of Regulation no. 17221 of 12 March 2010, if they have received total compensation during the year (obtained as the sum of monetary compensation and share-based compensation) that exceeds the highest total compensation received by the members of the board of directors or the management board, and the general managers of the share issuer;

c) individuals controlling the share issuer who are employees or members of the non-employed staff of the share issuer.

a) The Joint General Managers, Domenico De Angelis and Salvatore Poloni, of Banco BPM [1].
b) The provision is not applicable.
c) The provision is not applicable.

1.4 Description and number by category of:

a) executives with strategic responsibilities other than those indicated in paragraph 1.3b);

b) in the case of "small companies", pursuant to article 3, paragraph 1f), of Regulation no. 17221 of 12 March 2010, the total number of executives with strategic responsibilities of the share issuer;

c) any other categories of employees or non-employed staff for which the Plan envisages separate features (for example executives, middle managers, white collar employees, etc.).

a) In addition to the references listed in points 1.1 and 1.3 above, the Three-year Plan is also reserved to 2 executives with strategic responsibilities of Banco BPM.
b) The provision is not applicable.
c) There are no other categories of employees or non-employed staff for which the LTI Plan envisages separate features.

2. Rationale behind the Plan

The purpose of the 2021-2023 LTI Plan of the Banco BPM Banking Group is to pursue results that create long-term value for shareholders, taking into account the interests of other stakeholders that are important to the Bank; it also seeks to reward staff with an incentive that will only be paid in ordinary shares of Banco BPM, in accordance with the procedures illustrated below and subject to the achievement of pre-established access gateways, conditions and specific performance objectives.

With regard to the 2021-2023 LTI Plan, the share assignment structure - in accordance with the applicable national legislative provisions in force[2] - envisages up-front and deferred portions, over a long-term period (three or five years); a retention period (selling restriction) of one year is envisaged.

The Plan accordingly aligns incentives with the Group's long-term interests, therefore bringing management and shareholder interests together.

At this point it should be noted that no support for the LTI Plan is envisaged to come from the Special fund to encourage employee participation in businesses, pursuant to article 4, paragraph 112 of Law no. 350 of 24 December 2003.

[1] Where appointed, also the General Manager of Banco BPM participates.

2 Supervisory Provisions.

3. Approval procedure and timing of the share allocation

3.1 Scope of the powers and duties delegated by the Shareholders' Meeting to the Board of Directors for the implementation of the Plan.

In drawing up its proposal for approval of the LTI Plan to be submitted to the ordinary and extraordinary Shareholders' Meeting of Banco BPM called for 15 April 2021 (in single session), the Bank's Board of Directors has, inter alia, provided that the Chairman of the Board and the CEO, separately, and with the power to sub-delegate, should be awarded all the necessary powers for implementing the Plan, in accordance with the provisions of the Policy.

In this respect, pursuant to the Bylaws, the Ordinary and Extraordinary Shareholders' Meeting shall, inter alia, approve *(i)* the remuneration and incentive policies for Board Directors, Statutory Auditors and staff; *(ii)* share-based compensation plans.

3.2 Indication of the persons designated to administer the plan and their duties and responsibilities.

In the Parent Company, the Human Resources function is responsible for administering the LTI Plan, providing technical assistance to the corporate bodies and preparing support materials preparatory to the establishment of the remuneration policy and the actual implementation of the 2021-2023 Long-Term Incentive (LTI) Plan, with the collaboration of the Risk, Compliance, Finance, Planning and Control, Administration and Accounts, Company Affairs Secretariat and Operations, Real Estate and Purchasing functions, each within the scope of their responsibilities.

3.3 Any existing procedures for revising the Plan including with respect to changes in the basic objectives.

In the event of changes in the main long-term objectives or of regulatory changes that impact the Group or extraordinary corporate events, the Board of Directors of the Parent Company has the power to approve any changes and/or additions to the rules of the plan that are deemed necessary and/or appropriate to render it consistent with the changed context.

In the event of extraordinary capital operations which envisage the exercise of an option right, the Board of Directors of the Parent Company has the power to assess any consequent adjustments to any share portions that have vested but are not yet available to the beneficiaries. Lastly, in the event of a change in corporate control, early settlement on a pro-rata basis will be applied; in the event of a significant change in the shareholding structure, the Board of Directors will assess early settlement on a pro-rata basis.

The Shareholders' Meeting will be suitably informed should the above events take place.

3.4 Description of the procedures to establish the availability and the allocation of the shares on which the Plan is based.

Subject to the authorisation of the ordinary Shareholders' Meeting of Banco BPM held on 15 April 2021, and in accordance with the applicable legislation and, specifically, the conditions envisaged by article 5 of Regulation (EU) no. 596/2014 of 16 April 2014 relating to market abuse ("MAR Regulation") (see non applicability of prohibitions relating to market abuse), the Bank's Board of Directors may proceed with the purchase of own shares under a "Own share purchase programme" in order to fulfil its obligations resulting from share option programmes or other allocations of shares to employees or to members of the Management bodies or the Control bodies of the issuer or of an associated company.

The purchase must not exceed the quantity identified on the basis of the maximum number of shares that may be allocated to the beneficiaries of the Plan (estimated number based on the maximum result envisaged by the 2021 Short-Term Incentive (STI) plan) and in compliance with the authorisation of the European Central Bank.

The number of shares to be allocated to each beneficiary will be determined ex ante, based on the arithmetic average of the official prices recorded in the thirty calendar days prior to the date of the Shareholders' Meeting's resolution to approve the Share-based Compensation Plan (Ordinary Shareholders' Meeting of 15 April 2021).

3.5 Role performed by each director in determining the features of the plans; any conflicts of interest of the directors concerned.

After acknowledging the opinion of the Remuneration Committee, the Board of Directors has determined the features of the Plan, to be submitted to the Ordinary Shareholders' Meeting.

Considering that the 2021-2023 LTI Plan's beneficiaries also include the CEO of Banco BPM, the decisions of the Board of Directors have been taken in accordance with current legislative, regulatory and company provisions on conflicts of interest.

3.6 For the purposes of the requirements of article 84-bis, paragraph 1, the date of the decision taken by the body responsible for proposing the approval of the plans to the shareholders' meeting and the date of any proposal made by the Remuneration Committee.

On 9 March 2021, the Board of Directors resolved to approve Plan, to be submitted to the Ordinary and Extraordinary Shareholders' Meeting called for 15 April 2021 (in single session), after acknowledging the Remuneration Committee's opinion of 8 March 2021.

3.7 For the purposes of the requirements of article 84-bis, paragraph 5a), the date of the decision taken by the appropriate corporate body on the share allocation and any proposal made by the Remuneration Committee to the aforementioned body

The provision is not applicable.

The maximum estimated number of shares required to cover all existing plans is around 14 million (annual incentive for 2015, 2016, 2017, 2018, 2019 and 2020 and long-term incentive for 2017/2019), which considers the deferred portions that will vest from 2022 to 2027, subject to the successful fulfilment of all of the conditions envisaged for the vesting and, in addition, the amount estimated for the 2021 STI plan and the 2021/2023 LTI plan.

3.8 The market price recorded on the above-mentioned dates of the shares on which the plans are based, if traded on regulated markets.

The official market prices of ordinary Banco BPM shares on the dates referred to in paragraphs 3.6 and 3.7 of this Document were 2.0300 euro (Remuneration Committee meeting of 5 February 2021) and 2.1740 euro (Board of Directors' meeting of 9 February 2021), 2.2930 euro (Remuneration Committee meeting of 8 March 2021), 2.3230 euro (Board of Directors' meeting of 9 March 2021).

3.9 In the case of plans based on shares traded on regulated markets, as part of the steps taken to identify the timing with which the shares will be allocated in implementation of the plans, in what terms and by what means the issuer has taken account of a possible time clash between:

- ***i) said allocation and any decisions taken by the Remuneration Committee in this respect, and***
- ***ii) the publication of any significant information pursuant to article 114, paragraph 1 of the Consolidated Finance Law (CFL); for example, in the event said information has:***
  - ***a. not been published yet and may positively influence market prices,***
  - ***or***
  - ***b. already been published and may negatively influence market prices.***

When adopting and implementing the Plans, disclosures are made to the market as required by the legislative and regulatory provisions in force at the time.

Even though the resolutions adopted on share-based compensation plans have been examined in advance by the Remuneration Committee so that it may issue its opinion to the Board of Directors, disclosures to the market, where due, are made at the same time as the latter adopts its resolution.

4. Characteristics of the shares assigned

4.1 Description of how the share-based compensation plans are structured.

The incentive awarded under the 2021-2023 LTI Plan is assigned through the free allocation of ordinary Banco BPM shares ("performance shares"), which are subject to deferral and retention (selling restriction) clauses.

The incentive is broken down into an up-front portion corresponding to 40% and deferred portions comprised by:

- five annual portions of the same amount, deferred over the five-year period subsequent to the up-front portion, for senior identified staff;
- three annual portions of the same amount, deferred over the three-year period subsequent to the up-front portion, for the remaining beneficiaries of the plan.

There is a retention period (selling restriction) on the shares vested of one year both for the up-front shares and for deferred shares; for the latter, the retention period starts from the date on which the deferred remuneration is vested. The effective transfer of ownership to the beneficiary occurs at the end of the retention period.

4.2 Indication of the effective implementation period of the Plan with respect to any different cycles envisaged.

The LTI Plan's implementation period runs from the date of approval of the shareholders' meeting (2021) to the effective availability of the last share-based deferred portion (2028 or 2030 in the case of five-year deferral periods).

4.3 End of the Plan.

The Three-year Plan ends in 2030.

4.4 Maximum number of shares, including that in the form of options, allocated in each fiscal year to named individuals or to specific categories.

At the present time a theoretical maximum requirement of approximately 16 million euro has been estimated.

The assignment is distributed across the vesting years as illustrated in point 4.1 above.

At present, the maximum number of ordinary Banco BPM shares that will be allocated under the LTI Plan cannot be indicated, as the exact quantity is calculated on the basis of the arithmetic average of the official prices recorded in the thirty calendar days prior to the date of the Shareholders' Meeting's resolution to approve the Share-based Compensation Plan (Ordinary Shareholders' Meeting of 15 April 2021); at the time of the award of the incentive, said number will be dependent on the conditions envisaged for the 2021-2023 LTI Plan, as well as to what extent the performance objectives have been achieved.

4.5 Procedures and clauses for the implementation of the Plan, specifying whether the effective assignment of the shares depends on the fulfilment of conditions or the achievement of specific results, including performance; description of said conditions and results.

As at 31 December 2023, at consolidated level, the following access gateways will be verified: Common Equity Tier 1 (CET 1) ratio fully loaded 2023, Leverage fully loaded 2023 and Net Stable Funding Ratio (NSFR) regulatory 2023 higher than the Risk Trigger Threshold of the Risk Appetite Framework (RAF); Profit from current operating activities before tax (net of non-recurring items) 2023 higher than zero. Failure to fulfil even just one of the conditions means that the Plan cannot be activated and therefore the incentive of the LTI plan will not be awarded.

For each year in the period of 2021-2023, if the CET1 gateway of the short-term incentive plan is lower than the relative threshold, a reduction of 10% of the shares is envisaged.

As at 31 December 2023, the level of achievement of the performance objectives will also be verified: ROTE (stated) in 2023, Gross NPE ratio (stated) in 2023, Total Shareholder Return (TSR) and ESG.
The result of each objective is measured by linear interpolation within a range that envisages a minimum level (floor) and a maximum level (cap) of achievement. The number of shares that may be awarded for each objective is equal to: (i) 100% if the objective is achieved at least at the maximum level, (ii) 50% if achieved at the minimum level, (iii) zero, if below the minimum level and (iv) at a value calculated by linear interpolation between the floor and the cap.

The shares awarded at the end of the accrual period are assigned over the course of the vesting period in portions subject to one year of retention (selling restriction) from the vesting of each portion. The maximum duration of the plan is therefore 10 years, also including the year of retention of the last deferred portion.
If during the course of the year, any misconduct is ascertained, the Parent Company Board of Directors, for individuals directly appointed by the same, or the Chief Executive Officer of the Parent Company (or their proxy) for remaining individuals, decides what action to take as regards the incentive (which may entail its reduction or cancellation).
Misconduct is defined as follows:

- order for suspension from office and from payment of remuneration starting from a date. This entails exclusion from receiving the cited variable components of remuneration;

– conduct which does not comply with provisions of the law, regulations or the bylaws, or with codes of ethics or conduct applicable to the bank, which has led to a significant loss for a Group company or for customers;
– infringements[3] of the obligations imposed pursuant to article 26 or, when the individual is an interested party, pursuant to article 53 of the Consolidated Banking Law;
– infringements of the obligation not to use personal hedging strategies or insurance on remuneration or on other aspects to alter or undermine the risk alignment effects embedded in the remuneration mechanisms;
– fraudulent or grossly negligent conduct causing damage to a Group company;
– conduct that has led or contributed to significant damage to customers or a significant infringement of the rules contained in title VI of the Consolidated Banking Law, of the relative implementing provisions or of codes of ethics or of conduct to protect customers applicable to the bank.

In the event of misconduct as described above, the Parent Company Board of Directors, for individuals directly appointed by the same, or the Chief Executive Officer of the Parent Company (or their proxy), for remaining individuals, also reserve the right to activate mechanisms for the return of previously vested amounts or portions thereof from the time of their vesting for the following five years.

4.6 Indication of any restrictions on the availability of the shares with specific reference to the time periods within which the subsequent transfer to the company or third parties is permitted or prohibited;

The shares are bound to a retention period (selling restriction) of one year, both for up-front and deferred shares, which starts from their vesting.
Any rights and/or dividends only vest at the end of the retention period, i.e. with reference to the period following the transfer to the beneficiary's securities portfolio.
In the event of extraordinary capital operations which envisage the exercise of an option right, the Board of Directors of the Parent Company may assess any consequent adjustments to share portions that have vested but are not yet available to the beneficiaries.

4.7 Description of any termination clauses concerning the assignment of the Plan in the event that the beneficiaries carry out hedging transactions that make it possible to neutralise any selling restrictions on the shares assigned, including in the form of options, or on the shares resulting from the exercise of said options.

The Plan does not contain any termination clauses of the above nature.

3 For example in cases of infringements of professionalism, integrity and independence requirements.

Group Staff may not use personal hedging strategies or insurance on remuneration or on other aspects to alter or undermine the risk alignment effects embedded in their remuneration mechanisms.

4.8 Description of the effects caused by the termination of the employment relationship.

In the event of the termination of the employment relationship, both the up-front portion and the deferred portion are paid on a pro-rata basis[4] in the case of retirement, access to the solidarity fund, death, specific provisions contained in individual contracts or in individual agreements to terminate the employment relationship, without prejudice to cases in which all rights are lost.

The loss of all rights is envisaged if the employment relationship is terminated due to resignation, dismissal for just cause or justified subjective grounds as well as terminations of the employment relationship for any reason or grounds, including access to the solidarity fund, defined within the first half of 2021 that envisages termination in 2021.

4.9 Indication of any grounds for the cancellation of the Plan.

Only the cases illustrated in paragraph 4.5 above are applicable.

4.10 Reasons relating to the possible provision of a "redemption" by Banco BPM of the shares covered by the Plan,

laid down in accordance with articles 2357 et seq. of the Italian Civil Code; indication of the beneficiaries of the redemption stating whether the same is only applicable to specific employee categories; the effects of the termination of the employment relationship on said redemption.

The Plan does not provide for redemption by Banco BPM or any other Group company of the shares covered by the Plan.

4.11 Any loans or other benefits granted for the purchase of the shares pursuant to article 2358 of the Italian civil code.

The provision is not applicable.

4.12 Indication of the estimated liability for the company at the date of the related allocation, calculated on the basis of the terms and conditions already established, stated by total amount and in relation to each of the Plan's instruments.

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[4] Pro-rata based on the period of effective employment during the performance period. Payment is made applying the same procedures envisaged for staff in service that are beneficiaries of the LTI plan.

A maximum requirement of around 16 million euro has been estimated, even though it is not possible, at present, to quantify the exact liability envisaged, as its calculation depends on the fulfilment of the conditions of the 2021-2023 LTI plan and the performance levels achieved.
The liability will be distributed across the accrual period and vesting period of the LTI Plan, i.e. in the period of 2021-2028.

4.13 Indication of any dilutive effects on capital caused by the assignment of the shares.

Given the means by which it is implemented, the adoption of the LTI Plan will not have any dilutive effects on the Group's capital resulting from share capital increases.

4.14 Any envisaged restrictions on the exercise of voting rights and on the assignment of dividend rights.

With the exception of the retention period, there are no restrictions envisaged for the exercise of on voting rights or on the assignment of dividend rights.

4.15 If the shares are not traded on regulated markets, the information required to make a full assessment of their value.

The LTI Plan envisages the sole use of shares traded on regulated markets.

Reference should be made to the 2021 Policy for any matters not included herein.

9 March 2021 The Board of Directors

A Table setting out the "Share-based compensation plans" is provided below

Share-based compensation plans - Table 1 of Schedule 7 of Annex 3A of Regulation no. 11971/1999
Section 2 – Newly-allocated shares

Name and surname or category	Office held (to be indicated only for named individuals)	FRAME 1 Financial instruments other than stock options						
		Section 2 Newly-allocated shares based on the resolution: of the Board of Directors of 9/03/2021 proposed to the shareholders' meeting						
		Date of the resolution of the shareholders' meeting	Type of financial instrument	Number of financial instruments	Date of assignment	Purchase price of instruments, if relevant	Market price on assignment	Vesting period
Giuseppe Castagna	CEO of Banco BPM	15/04/2021	Banco BPM Ordinary Shares	NA	15/04/2021	NA	NA	2021 - 2029
Marco Federico Turrina	CEO - General Manager of Banca Akros	15/04/2021	Banco BPM Ordinary Shares	NA	15/04/2021	NA	NA	2021 - 2029
Alessandro Varaldo	CEO of Banca Aletti	15/04/2021	Banco BPM Ordinary Shares	NA	15/04/2021	NA	NA	2021 - 2029
Domenico De Angelis	Joint General Manager of Banco BPM	15/04/2021	Banco BPM Ordinary Shares	NA	15/04/2021	NA	NA	2021 - 2029
Salvatore Poloni	Joint General Manager of Banco BPM	15/04/2021	Banco BPM Ordinary Shares	NA	15/04/2021	NA	NA	2021 - 2029
2 Executives with strategic responsibilities		15/04/2021	Banco BPM Ordinary Shares	NA	15/04/2021	NA	NA	2021 - 2029
3 Other Plan beneficiaries		15/04/2021	Banco BPM Ordinary Shares	NA	15/04/2021	NA	NA	2021 - 2029
50 Other Plan beneficiaries		15/04/2021	Banco BPM Ordinary Shares	NA	15/04/2021	NA	NA	2021 - 2027