

WORKPLACE HEALTH AND SAFETY GUIDELINES

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1 Introduction

1.1 Purpose

The Guidelines govern the principles, roles and responsibilities regarding workplace health and safety.

1.2 Scope of application and implementation procedures

The Guidelines apply to the Parent Company Banco BPM, as well as to Banca Aletti, Banca Akros, Aletti Fiduciaria, Banco BPM Invest SGR, Banco BPM Vita, Vera Vita and Tecmarket Servizi, in compliance with the service agreements stipulated with these companies.

The document and its subsequent updates are applied by the aforementioned Companies, which ensure that their own internal regulations are consistent with the Guidelines.

The document is approved by the Parent Company's Chief Executive Officer.

1.3 Summary of updates

ID Number	Date of update	Update summary content
Initial approval	01/10/2020	
1st update	22/07/2022	Adaptation to changes in the Group's organizational structure.
2nd update	08/05/2024	Formal adjustment interventions to keep the Guidelines consistent with the Group's organizational structure.

General Principles 2

In line with the issues defined by the Code of Ethics (RE 311), the guiding values of the decisions made by the Banco BPM Group incorporate the protection of people's health and safety, through a commitment to ensuring a work environment compliant with legal standards.

The definition of the principles, roles and responsibilities regarding health and safety identified to promote the policies, internal processes regarding safety and well-being in the workplace, is based on:

- the main international treaties on human rights, in relation to the protection of health and safety and, in particular, the UN Declaration of Human Rights (Articles 3 and 23), the C155 Occupational Health and Safety Convention issued by the ILO (International Labour Organisation) on 22 June 1981, the principles of the Global Compact promoted by the United Nations (principle 1.06) and the UN Sustainable Development Goals (UN 2030 Agenda - target 8);
- the applicable legal provisions;
- the internal regulations issued.

In addition, fully aware of the importance and essential nature of health, safety and prevention of environmental offences, the correct and sustainable management of environmental protection in respect of the relevant external and internal regulations is always considered (specifically, with reference to the Guidelines on the management of environmental matters -LG 19).

The risk assessment activities and preparation of the subsequent prevention and protection measures and those of an organisational nature, of health surveillance, information and training and monitoring, are consistent with said regulatory sources.

The Guidelines define the principles and controls regarding the prevention, management and reduction of the impacts on health and safety that concern all employees and all subjects that come into contact with the activities performed by the Group and access its properties¹.

Owing to the systematic framework of the internal processes and health and safety services integrated with the principles outlined above, Banco BPM's workplace health and management system is compliant with standard UNI EN ISO 45001:2018².

The Group is committed to searching for the most suitable solutions to create an organic system that ensures the adoption of the main measures relating to company health and safety³ and that is aimed at:

allowing personnel and associates to engage in good conduct in their daily work activities;

¹ including the subjects that operate with special forms of contract, advisors, interns, customers, suppliers, visitors and the auditors of the Supervisory Body.

² reference standard of the International Organisation for Standardisation recognised at global level for the workplace health and safety management system.

³ such as, for example: fire prevention measures, safety of premises, healthiness of workplaces and protection against occupational illnesses.

- ensuring observance of the principles contained in the Guidelines and the internal regulations relating to the protection of workplace health and safety;
- making information material on company safety available and keeping it updated;
- developing human resources by offering of a training plan aimed at continuously improving the skills of all employees, promoting involvement and enhancing their awareness of workplace health and safety issues.

Banco BPM undertakes, vis-à-vis third parties, through its decisions and actions, to:

- verify the technical-professional suitability of partner firms and freelance associates;
- work with consumer associations and with other organisations to promote the protection of human rights and protection of the environment with the goal of improving reciprocal processes of interaction, specifically those relating to the chain of supplies of goods and services to Group companies, by verifying the acceptance by said organisations of ethical, social and environmental criteria, defined through international standards;
- engage in conduct that prevents incidents, accidents or any risks stemming from environmental impact, logistics or health events, to which customers could be exposed, by evaluating and minimising the possible hazards as well as ensuring effective measures, compliant with the regulations in place to protect the branches and any additional company space open to the public.

In support of these actions, Banco BPM has an annual improvement plan in place to monitor health and safety risks, as well as to prevent accidents and any non-conformities occurring.