



## **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 Vita, Banco BPM Assicurazioni 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.

## 2 General Principles

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 properties<sup>1</sup>.

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 45001:2018<sup>2</sup>.

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 safety<sup>3</sup> and that is aimed at:

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

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

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

<sup>3</sup> 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.

## 3 Roles and Responsibilities

### 3.1 Parent Company

The Parent Company, which exercises responsibility for the management and control of activities, in accordance with the Guidelines:

- determines the principles and rules that govern the company health and safety process, defining the organisational structures and the responsibility profiles of each Group entity;
- appoints its own workplace health and safety officer or his/her representative.<sup>4</sup>
- conducts overall monitoring of the safety of the companies included in the reference scope;
- adopts initiatives to develop operating procedures in internal processes to encourage the awareness of compliant behaviour, promoting the appropriate initiatives for the dissemination of a culture of company health and safety in the workplace;
- acknowledges any regulatory and technical changes, making the required amendments to the reference context.

### 3.2 Other Group Companies

The companies included in the reference scope shall:

- acknowledge the relevant directives and regulations approved by the Parent Company, by adopting their principles, rules, roles and responsibilities;
- appoint their own workplace health and safety officer or his/her representative<sup>4</sup>;
- take prompt action regarding any hazards and risks connected with health and safety in the activities carried out by them.

### 3.3 Supervisory Body pursuant to Italian Legislative Decree 231/2001

The Supervisory Body of each Group Company, where established, promptly informs the Corporate Bodies of any risks identified in carrying out their activities connected with the offences set forth in Legislative Decree 231/2001, within which the offences of manslaughter or serious or very serious injuries committed in breach of the regulations governing workplace health and safety are of relevance<sup>5</sup>.

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<sup>4</sup> In accordance with the terms in which they are defined by Article 16 of Legislative Decree 81/08.

<sup>5</sup> Legislative Decree 231/01, Article 25-*septies*.

## 3.4 Corporate Functions

### Operations, Real Estate and Purchasing

Through the Safety and Physical Prevention Function, the function is responsible for guaranteeing adequate health and safety controls, consistent with the guidelines and objectives defined by the legislation and by the annual improvement plan drafted as part of the health and safety management system and submitted to the Parent Company's Environmental, Social and Governance (ESG) Committee.

For this purpose, the function:

- assumes responsibility for the Prevention and Protection Service and guarantees coverage of the Energy Manager engagement for the Group companies that have resolved on a specific appointment in that regard;
- ensures the implementation of the internal and external regulations regarding the protection of the health and safety of workers, security and moveable assets and real estate, and proposes improvement actions for operating processes in the areas within its scope;
- coordinates, through its operating presences in the local area, the effective monitoring of workplace health and safety issues;
- oversees the obligations stemming from Legislative Decree 81/08, supporting employers or representatives and collaborating with the other competent corporate structures;
- monitors the certification process relating to the environmental safety and energy<sup>6</sup> standards adopted by the Group;
- manages compliance risk in relation to workplace safety, as a specialist control unit;
- launches periodic internal audits of the health and safety management system.

Through the SAFETY structure, reporting to the Safety and Physical Prevention Function, the function helps to monitor the fulfilment of the obligations regarding the protection of workers' health and safety, including health surveillance activities. In particular, it is responsible for:

- collaborating in the definition and updating of the internal rules relating to the protection of workers' health and safety;
- monitoring the implementation of *safety* policies;
- preparing the risk assessment document for workplace health and safety, also in relation to the information provided by employers or their representatives;
- preparing emergency *safety* plans, together with the Human Resources Function and the Real Estate Management structure, ensuring the identification and designation of the appointed roles;
- training those responsible for the management of emergencies, first aid and evacuation of work environments;
- collaborating with the other Group structures concerned by the definition of the characteristics of the layouts of the workplaces and workstations, thoroughfares and escape routes;

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<sup>6</sup> Ref. ISO 45001 - occupational health and safety management system.

- organising health surveillance activities together with the coordinating company doctor;
- preparing adequate information flows (reports) to the top management bodies;
- planning and coordinating the on-site inspections of the company doctors in work environments;
- managing relations with workers' safety representatives, as well as with the external inspection bodies for the procedures relating to workers' health and safety matters;
- planning and coordinating evacuation drills at Group sites;
- reporting, in compliance with the rules of the loss data collection process in force from time to time, the operating risk events for matters within its competence

Through the Security and Operations Centre structure, reporting to the Safety and Physical Prevention function, the function helps to monitor and implement the active and passive physical safety measures defined for the protection of the Group's people and work environments.

Through the Energy Management structure, reporting to the Safety and Physical Prevention, the function helps to ensure the appointment of the Energy Manager<sup>7</sup> as well as map and manage, in collaboration with the Real Estate Management and Safety structures, direct environmental problems<sup>8</sup>.

## **Human resources**

In relation to the corporate organisational processes in force that allow – through the coordinated contribution of the corporate structures concerned – an integrated and cross-company approach to managing health and safety, environment and energy systems, the function is responsible for defining:

- - through Labour Policies, the policies for the management and development of the themes that concern the areas of particular social relevance of employees, simultaneously ensuring adequate support for the Group structures specifically dedicated to applying Legislative Decree 81/2008 and its subsequent amendments to personnel;
- - through Development and Training, the management and development of training on health and safety matters.

## **Compliance**

For this purpose, the function:

- continuously monitors developments in EU and Italian legislation, identifying regulatory changes and carrying out an initial identification of the affected processes;
- records any needs for changes to company processes following the issue of new regulatory requirements or the amendment of existing requirements, defining proposed initiatives to ensure compliance and consistency with regulatory provisions;

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<sup>7</sup> Pursuant to Law 10/91 of 9 January 1991

<sup>8</sup> related to Legislative Decree 81/08, such as, for example, the verification of any presence of asbestos and/or radon.



- notifies the Corporate Bodies of any risks identified in the checks on the compliance with the regulations in force, the internal regulations and the company processes impacted directly or indirectly by issues relating to workplace health and safety.

### **Communication**

The function is responsible, through the Sustainability structure, in collaboration with Development and Training, for promoting and extending internal training initiatives, limited to the areas of sustainability.