

PRINCIPLES ON HUMAN RIGHTS

Owner:

Corporate Bodies Secretariats and General Affairs Head Office Department

Recipients:

Intesa Sanpaolo Group

Path:

ARCO - Foreign Network - Headquarter Governance Documents – Governance Documents –
General Principles Governance

Date of effect: December 2017

CONTENTS

1. PRELIMINARY REMARKS
2. INTERNATIONAL STANDARDS
3. GENERAL REFERENCES OF THE INTESA SANPAOLO GROUP
4. SCOPE OF APPLICATION
 - EMPLOYEES
 - CUSTOMERS
 - SUPPLIERS
 - COMMUNITY
5. MONITORING
6. DISCLOSURE AND COMMUNICATION

Principles on Human Rights

1. Preliminary remarks

Given that each State, according to the United Nations International Bill of Human Rights, has the precise responsibility to respect, protect and promote human rights and the fundamental freedoms for all, without any distinction of gender, ethnic group, language, religion, age, sexual orientation and gender identity, political persuasion and union association, origin, disability or other particular conditions, the Intesa Sanpaolo Group recognizes the fundamental principle affirmed by the Universal Declaration of Human Rights and by the UN Guiding Principles on Business and Human Rights which attaches similar responsibility also to each single individual and to businesses.

2. International standards

Intesa Sanpaolo, in addition to respecting national law in all countries where it operates, is committed to identify, mitigate and where possible prevent, potential violations of human rights linked to its own activities, as recommended by the UN Guiding Principles on Business and Human Rights.

Intesa Sanpaolo adheres to the UN Global Compact and is committed to respect and promote the ten fundamental principles relating to human rights, labour rights, protection of the environment and future generations and anti- corruption.

As a member of UNEP Finance Initiative (UNEP FI), Intesa Sanpaolo pursues a sustainable development, consistent with environmental protection.

3. General references of the Intesa Sanpaolo Group

Intesa Sanpaolo has adopted a Code of Ethics which explicitly declares:

- to sustain human rights according to the Universal Declaration of 1948 and the International Covenants on Civil and Political Rights and on Economic, Social and Cultural Rights
- to respect the fundamental rights established by the eight conventions of the ILO (International Labour Organisation) as stated in the ILO Declaration on Fundamental Principles and Rights at Work, in particular the right of association and collective bargaining, the prohibition of forced and child labour and non-discrimination in the workplace.
- to recognize the importance of the principles proclaimed in the 2016 United Nations Convention on the Rights of Persons with Disabilities
- to contribute to the fight against corruption – meant as the abuse of power, role and resources to obtain personal gain, or the inducement to make such an abuse – supporting the guidelines of the OECD (the Organisation for Economic Cooperation and Development) and the anti-corruption principles established by the United Nations in 2003, also through an attitude of zero-tolerance to any episode of corruption.

4. Scope of application

Intesa Sanpaolo is committed to promote human rights in all the situations where it recognizes an effect of its activity.

In particular, utmost attention is given to the Group's main stakeholders – employees, customers, suppliers, community – as established in the Code of Ethics. The environment, to which Intesa Sanpaolo recognizes the legitimacy of stakeholder, is considered across all scopes of application.

Employees

Intesa Sanpaolo is committed to respecting the personality and dignity of each employee. The following principles of the international standards, chosen based on their relevance and interpreted in the light of the company context, are integrated in the Code of Ethics and in the company's policies:

- Occupational Health and Safety
- Anti - harassment and monitoring working conditions that may cause discomfort and stress
- Right to privacy of personal and sensitive data
- Freedom of association: freedom to participate and associate in trade unions and in other forms of workers' representation
- Countering any form of child labour
- Non - discrimination based on gender, age, ethnic origin, religion, political persuasion and union association, sexual orientation and gender identity, language or disability (equal opportunities in the hiring, management, professional development and career advancement of employees)
- Right to a fair remuneration
- Protection of social security ensuring an adequate supplementary pension
- Right to private life through policies of work-life balance

Customers

Intesa Sanpaolo believes that a fair relationship with customers must be based on sharing corporate values and on the respect of human rights in all offered products and services. The Group's relationship with its clients is founded on the principles of equity and transparency; customers are at the centre of the Group's consideration through ongoing dialogue to embed their actual expectations, with special attention to the financial inclusion of most vulnerable social groups. The following principles of the international standards, chosen based on their relevance and interpreted in the light of the company context, are integrated in the Code of Ethics and in the company's policies:

- Right to the privacy of personal and sensitive data
- Non - discrimination based on gender, age, ethnic origin, religion, political persuasion and union association, sexual orientation and gender identity, language or disability
- Right of customers to health and safety (policies and actions to counter robberies)

Suppliers

Intesa Sanpaolo's relationship with its suppliers is founded on the principles of listening and dialogue, transparency and equity for a mutual benefit.

The Group recognizes its responsibility towards society and the environment along the whole supply chain and for this reason:

- it selects, through clear and verifiable criteria, suppliers and sub-suppliers that found their activity on social and environmental sustainability and that adopt measures and tools necessary to minimize possible negative impacts triggered by their action;
- it steers its suppliers and sub-suppliers' policies towards respecting human rights, labour rights and environmental protection.

The following principles of the international standards, chosen based on their relevance and interpreted in the light of the company context, are integrated in the Code of Ethics and in the company's policies:

- Non - discrimination based on gender, age, ethnic origin, religion, political persuasion and union association, sexual orientation and gender identity, language or disability
- Right to health and safety (avoid commercial relationships with suppliers involved in violations of H&S standards)
- Countering child labour and forced labour (avoid commercial relationships with suppliers involved in violations of this principle).

Community

Intesa Sanpaolo's relationship with the community is based on the principles of listening and dialogue with the diverse areas of civil society; the Group is committed to assess the consistency of its financing, investment and other services with the following principles, integrated in the Code of Ethics and in the company's policies:

- Right to life and right to health
- Right to self-determination of local communities
- Right of indigenous people to preserve, protect and develop their own traditions and cultures
- Right to an adequate life standard
- Right to education and to take part in cultural life

Regarding the support to the community, Intesa Sanpaolo is engaged in community contribution activities and charitable giving, based on an attentive selection of beneficiary organizations and projects, with a special attention to human rights.

5. Monitoring

The implementation and progressive extension of human rights' protection is monitored through:

1. The evaluation of the implementation and governance of the Group's Code of Ethics, performed also through the assessment by an independent third party according to the UNI ISO 26000 international standard, with a specific focus on human rights' issues;

2. Sustainability reporting, which includes stakeholder engagement and defines improvement targets and the related performance indicators, subject to certification by an independent third-party auditor;
3. the analysis of business impact and potential risks on human rights – subject to periodical update – which highlights the areas of greater risk taking into consideration the International Bill of Human Rights and the eight main ILO conventions as defined in the ILO Declaration on Fundamental Principles and Rights at Work.

Based on the results of the monitoring processes described above, Intesa Sanpaolo is committed to:

- evaluate the need for an update of the present document
- define guidelines of intervention to prevent and mitigate possible negative impacts on its stakeholders
- issue, when needed, specific documents covering the rights involved and related activities.

As a further safeguard measure for all stakeholders, the Code of Ethics mailbox (codice.etico@intesasanpaolo.com) is available, to which anyone can report cases of non - compliance, covered by confidentiality and protected from any form of retaliation, discrimination or penalisation.

6. Disclosure and communication

The present document is brought to all employees' attention also through specific training sessions according to the different areas of operation, roles and responsibilities.

Moreover, the document is published in the Group's institutional web site (www.group.intesasanpaolo.com). A specific communication on the monitoring and assessment's results and on any mitigation actions is disclosed in the sustainability reporting.