



Global Policy

**Policy against Harassment, Sexual Misconduct and  
Bullying**

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# **1 INTRODUCTION**

## **1.1 Purpose and Context of the document**

This Policy, inspired by the Universal Declaration of Human Rights, the Group's values and the Group Code of Conduct, sets out the expectations that UniCredit has of its Employees and its commitment to a serene, collegial and professional work environment devoid of any form of harassment, sexual misconduct and bullying.

The intention of this Policy is the prevention, detection, enforcement, and on-going monitoring of harassment, bullying and sexual misconduct, including by providing support for individuals who report (both Employees and Third Parties) and by protecting individuals who report applicable misconduct from retaliation.

This Policy reinforces the Group's commitment in the "*Joint Declaration - Equal Opportunities and Non-Discrimination*", signed by the members of the European Work Council and the Group's Human Resources Representatives to ensure a workplace requiring respect for the principle of equal treatment and equal dignity for all irrespective of age, race, colour, nationality, citizenship, political belief, religion, marital status, gender, sexual orientation and identity, disability and any other category protected by law.

This Policy reflects Group's belief that any act of harassment, bullying or sexual misconduct threatens the dignity of the person subjected to it, potentially compromising their health, trust, morale, motivation to work, and work performance, the organisational climate and the Group's reputation. Harassment, sexual misconduct and bullying are inconsistent with the above goals and this Policy and, therefore, will not be tolerated in any way. Employees must be aware that behaviors and words could be perceived and interpreted differently by each person; therefore, they have to pay attention.

## **1.2 Regulation framework and scope of application**

The Group respects - and all Employees are required to respect - all applicable international, national, and local laws and regulations. There may be countries where Group's standards and requirements may exceed the requirements of that jurisdiction. There may also be behaviors UniCredit prohibits irrespective of whether or not these behaviors are prohibited by law. The Group will enforce the highest standards under this Policy irrespective of whether or not prohibited by law.

This Policy applies to behaviours internally and externally in all Legal Entities and to all Employees of the Group. The Policy applies to behaviors regardless of gender or level of seniority. The Policy applies both on-site in UniCredit offices and off-site, such as at clients' offices, events and travel locations, and is applicable in all work-related settings, including business trips, meetings, events, and social events related to the Group and Group business. Although the Group cannot control the conduct of Third Parties, the Group does not condone harassment, sexual misconduct or bullying and will adopt appropriate consequence management measures in order to repress and avoid situations involving harassment, sexual misconduct or bullying that arise involving Third Parties. The Group will take appropriate steps to prevent any such harassment, sexual misconduct or bullying and to ensure that the person reporting the misconduct is not adversely affected in terms of work assignments or other work-related activities as a consequence.

## 1.3 Glossary

Key word	Definition
Employees	All persons linked to UniCredit S.p.A. and to Legal Entities through an employment contract (including consultants and secondees) and all members of executive, strategic and control bodies.
Legal Entity	Legal Entity directly or indirectly controlled by UniCredit S.p.A.
Group	UniCredit Group, composed of UniCredit S.p.A. and Legal Entities.
Third Parties	Individuals or legal entities connected to the Group through a formal agreement, such as clients, supplier, tied agents, ect..

## 2 GENERAL COMMITMENT AND PRINCIPLES

In performing their daily work activities, all Employees must contribute toward creating and maintaining a respectful and harmonious work environment and eliminating intimidating, hostile, degrading, humiliating or offensive words and behaviors. Employees must contribute toward assuring respect for the rights, value and dignity of the person in all workplace relationships and maintaining a work environment in which harassment, bullying and sexual misconduct are considered unacceptable.

The Group does not tolerate any form of harassment, sexual misconduct or bullying. The Group believes respect for the rights and inviolability of all Employees throughout the Group is essential.

### 2.1 Harassment

The Group, in promoting a work environment characterised by mutual respect and proper behaviour, prohibits any form of harassment carried out or attempted by an Employee.

This Policy prohibits any form of harassment based on actual or perceived sex; race; color; creed; religion or belief; sexual orientation or preference; gender identity or expression (including self-image, appearance or behavior) or gender reassignment; national origin; age; disability; marital status; domestic or civil partnership status; alienage or citizenship; ancestry (including ethnicity); military status; veteran status; genetic predisposition or carrier status; pregnancy and maternity; medical conditions also related to pregnancy or childbirth; status as a victim of domestic violence, sex offenses, or stalking; unemployment; or any other category protected by law in the local jurisdiction.

The term harassment means any unwelcome conduct or attempted unwelcome conduct, isolated or repeated, whether verbal, non-verbal, psychological, or physical, which is unacceptable, inappropriate or undesired, and which has the purpose or the effect of: interfering with an individual's work performance, living habits, or dignity, causing a state of fear or anxiety in the individual, causing fear or anxiety for the individual for their safety or the safety of others associated with the individual, affecting decisions regarding employment or professional development, or otherwise creating an intimidating, hostile, degrading, humiliating or offensive working environment, regardless of the identity of the intended target of the harassment.

Depending on the circumstances, harassment may include but is not limited to: jokes, epithets, slurs, racial epithets, stereotyping, threats, intimidation, hostile acts, slander, defamation, insults, aggression, derision, spreading of confidential information, restriction of the freedom of expression, written or graphic material, including e-mail and text or electronic messaging, or any other conduct or behaviour that denigrates or shows hostility or aversion toward an individual's or group's race,

colour, age, sex, religion or beliefs, national origin, ancestry, sexual orientation, gender identity, reassignment, or expression, marital or civil partnership status, mental or physical disability, or any other protected characteristic. Allusions, epithets, comments and decisions that are harmful or are offensive may also be considered acts of harassment, and are therefore prohibited under this Policy. Such conduct violates this Policy even if it is not unlawful.

## **2.2 Sexual Misconduct**

Sexual misconduct means any unwelcome behavior which has a sexual connotation or which is directed at an individual because of that individual's sex or gender (including pregnancy, childbirth and related medical conditions), gender identity or gender expression (including transgender status), and/or sexual orientation, or which offends the dignity of the individual, when submission to such unwelcome conduct is an explicit or implicit term or condition of employment, where submission to or rejection of such conduct becomes the basis for employment decisions affecting the individual, or such conduct has the purpose or effect of unreasonably interfering with the individual's work performance or creating an intimidating, hostile or offensive working environment.

Sexual misconduct can occur among any individuals, regardless of their sex or gender, and is prohibited regardless of whether the conduct is engaged in by a supervisor, co-worker, client, vendor, or any other Third Party with whom Employees interact as part of their employment with the Group. In addition, harassment and any form of discrimination based on the orientation, sexual identity and gender of a person, whether they are lesbian, gay, transgender, bisexual or intersexual ("LGTBI"), is also strictly prohibited.

Conduct that constitutes sexual misconduct prohibited by this Policy includes, but is not limited to:

- Physical assaults of a sexual nature, such as:
  - Touching, pinching, patting, kissing, hugging, grabbing, brushing against another's body or poking another's body; or
  - Rape, sexual battery, molestation or attempts to commit these assaults;
- Unwanted sexual advances or propositions, such as:
  - Requests for sexual favors accompanied by implied or overt threats concerning the target's job performance evaluation, a promotion or other job benefits or detriments; or;
  - Subtle or obvious pressure for unwelcome sexual activities;
  - Explicit or implicit requests for sexual favours;
  - Gestures, jokes, sexually motivated, provocative, lewd or unseemly winking, undesired or bothersome voluntary physical contact and verbal remarks on the physical appearance of a person or on anatomical parts of the body;
- Sexually oriented gestures, noises, remarks, references to appearance or dress, jokes or comments about a person's sexuality or sexual experience, including comments based on sex stereotypes, which create a hostile work environment;
- Sexual or discriminatory displays or publications anywhere in the workplace, such as:
  - Displaying pictures, posters, calendars, graffiti, objects, promotional material, reading materials or other materials that are sexually demeaning or pornographic. This includes such sexual displays on workplace computers or cell phones and sharing such displays while in the workplace;
  - Distribution or display of any kinds of objects, photos, or other materials of a sexual nature;
- Hostile actions taken against an individual because of that individual's sex, sexual orientation, gender identity and the status of being transgender, such as:
  - Interfering with, destroying or damaging a person's workstation, tools or equipment, or otherwise interfering with the individual's ability to perform the job;
  - Sabotaging an individual's work; or
  - Bullying, yelling, name-calling.

Any implication that response to a sexual advance may be the basis for any employment-related

decision is contrary to this Policy. The Group also explicitly prohibits any behaviour conditioning employment, remuneration, or career opportunity on any form of sexual or romantic activity.

### **2.3 Bullying**

Bullying is defined as repeated verbal abuse; verbal, non-verbal, or physical conduct of a threatening, intimidating or humiliating nature; or the sabotage or undermining of a person's work performance.

Bullying harms an individual's personal and professional dignity and contributes to a hostile work environment. Typical examples include both overt and insidious behaviour, including provocations, oppressive conduct, marginalization, humiliation, insults, slander, physical and verbal aggression, ostracization, as well as conduct likely to create embarrassment.

## **3 REPORTING PROCESS**

It is essential for the protection of people, of the work environment and of Group's reputation, that all Employees report acts of harassment, bullying or sexual misconduct. Therefore, the Group emphasises the importance of reporting such behaviors, supporting the victims of such behaviors, and protecting those reporting (whether victims or bystanders) from all forms of retaliation.

If an act of harassment, bullying, or sexual misconduct occurs or is attempted, the Employee, in any case without prejudice to the possibility of having recourse to the competent authorities, should promptly report the matter, alternatively:

- through the channels outlined in the *Whistleblowing* procedure in force within the relevant Legal Entity;
- to the *Human Capital* Department of their Legal Entity;
- to their direct Line Manager or, in the case the latter is involved in the act, to the superior Manager, as identified based on the line of hierarchy, who will involve *Human Capital* Department of their Legal Entity; or
- through any other possible channels made available by the Legal Entity.

Upon becoming aware of any allegations of harassment, bullying, or sexual misconduct, the Group is committed to investigating promptly and to resolving in a fair manner claims of harassment, bullying and sexual misconduct. Any complaint or report will be kept in confidence to the extent possible, consistent with the Group's obligation to investigate the matter. Every effort will be made to handle such reports and complaints promptly and with discretion and confidentiality. Employees are required to cooperate in investigations conducted pursuant to this Policy.

In this regard, the Group undertakes to create a work environment in which each Employee feels protected and free to be able to report, without the fear of a potential retaliation.

If you witness an Employee experiencing or witness conduct prohibited by this Policy, you are expected to report the misconduct. If you experience conduct that you believe to be contrary to this Policy, or you believe someone has violated this Policy, you are expected to report such conduct, secure in the knowledge that you will be listened to, treated with respect, and not subjected to intimidation or retaliation.

## **4 PROTECTION MEASURES**

The Group is committed to promoting equal opportunities for all Employees and to the global communication, implementation and enforcement of this Policy within the Group worldwide, including as it relates to Third Parties.

Training is an essential element of implementing and enforcing this Policy, including promoting awareness and prevention.

In this regard, the Group undertakes to provide up to date, mandatory training on anti-harassment, bullying and sexual misconduct to all Employees which outlines the relevant procedures to follow and the potential consequences should misconduct occur. The Group also undertakes to provide the necessary assistance and support to any individuals who suffer misconduct in violation of this Policy.

All perpetrators of prohibited behaviour and acts of harassment, bullying, or sexual misconduct reported and confirmed are subject to disciplinary proceedings by the relevant Legal Entity, which may lead to termination of employment for just cause.

## **5 ANTI-RETALIATION**

The Group is firmly committed to protecting any Employee who reports misconduct under this Policy, or raises any concerns, from retaliation. Employees will be protected from retaliation from anyone (not just the alleged wrongdoer) and for as long as necessary.

Therefore, the Group, in order to prevent, investigate and protect Employees from acts of retaliation, is committed to promoting an environment where Employees:

- i) feel comfortable engaging in open and honest communication;
- ii) are encouraged to speak up and to raise good faith concerns promptly regarding any situation that they may feel is unethical, fraudulent, or illegal, without fear of retaliation;
- iii) are encouraged to speak up even if they are not certain of, or do not have evidence of, their good faith concerns.

Retaliation is any adverse conduct taken because a person:

- reports any actual or perceived violation of Group regulation, laws or any other prohibited or inappropriate workplace behaviour; and/or
- expresses opposition to the type of conduct that would be a violation of Group regulation, laws or any other prohibited or inappropriate workplace behaviour; and/or
- participates in the reporting and investigation process set forth in any of Group regulation; and/or
- assists in an investigation or proceeding involving an actual or perceived violation of any Group regulation.

Any perpetrators of retaliatory acts and behaviour against the reporting Employee or the reporting Third Party, including all acts aimed at silencing said Employees and individuals through economic incentives or other benefits, are equally subject to disciplinary proceedings. Retaliation is strictly forbidden and separately constitutes a violation of this Policy.

Please refer to the “*Global Policy - Anti-Retaliation*”, as implemented within each Legal Entity.

## 6 EXAMPLES

Conducts prohibited by this Policy includes, but is not limited to the following examples:

- ***Sexually explicit statements, even if intended to be complimentary.*** For example, comments by Employee A to Employee B which are derogatory and demeaning to Employee B, even if Employee A claims to be complimenting Employee B (e.g., positively commenting on Employee B's attractiveness and physical appearance) would constitute sexual harassment.
- ***Statements directed to an individual based on their sex in an effort to intimidate the Employee.*** For example, comments by Employee A to Employee B, a parent and a woman that Employee B is "taking jobs away from men" and "should be home with your kids" would constitute sexual harassment.
- ***Sexual touching which may be inadvertent and only happens once.*** For example, Employee A running their hand over Employee B's genitalia as Employee A reaches for a notebook may constitute sexual harassment and should be reported regardless of whether the conduct is repeated or whether the contact was inadvertent.
- ***Accepting and voluntarily engaging in sexual activity with a supervisor who offers the Employee an employment benefit in exchange for sexual activity.*** For example, if Supervisor A offers Employee B the opportunity to attend an important client presentation in exchange for sexual activity, and the sexual activity is unwelcome to Employee B, Employee B is still a victim of sexual harassment even if Employee B accepts and engages in sexual activity.
- ***Racist slang, phrases, or nicknames.*** For example, if Employee A repeatedly refers to Employee B by a racist nickname, and Employee C - who is the race referenced by the nickname - overhears the racist nickname, Employee C is still a victim of harassment, even if Employee A and Employee B are not offended by the racist nickname.
- ***Harassing another Employee on the basis of sex stereotyping.*** For example, if Employee A repeatedly tells Employee B, a gay individual, that Employee B does not dress professionally because Employee B does not present in traditionally feminine or masculine attire, Employee B is a victim of harassment on the basis of sexual orientation.

## 7 DISCIPLINARY ACTION

Any breach of the provisions contained in this Policy or any principle, value, fundamental obligation and law provision connected to such matter, may lead to disciplinary proceedings that may involve a proportionate disciplinary sanction, including the termination of employment for just cause of the relevant responsible Employee.

The Group is committed to implementing and continuously updating, the highest standards of organisational and management measures to prevent similar situations from occurring again.

## 8 REPORTING

On annual basis, Legal Entities have to report cases under this Policy to their Governing Bodies. Each Legal Entity will send to UniCredit S.p.A. periodical report showing, on an anonymous basis, cases and trends of the reports received in the referring period.