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# Global Policy

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## DIVERSITY, EQUITY & INCLUSION

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FB 060\_2024

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**Approving Function: Board of Directors**

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**Proposing Function: Chief People Officer Department**

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**Date: December 2024**

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<b>Owner</b>	Chief People Officer		
<b>Process Tree</b>	Process Type: Operations & support to the Business - MG: Human Resources & Infrastructure Management - MP: Sustainability - EP: Management of sustainability strategies and policies/initiatives - SP: Definition, development and support of policies and activities related to environmental and social issues		
<b>Contacts</b>	<b>Clarifications on the document</b>		Entity: Chief People Officer Dept.  e-mail: <a href="mailto:risorseumane@fineco.it">risorseumane@fineco.it</a>
	<b>Operational Assistance</b>		<a href="mailto:risorseumane@fineco.it">risorseumane@fineco.it</a>
<b>Parent Company departments involved in the sharing process</b>	Sustainability Compliance Organisation and Bank Operations		
<b>Parent Company certification by area of responsibility</b>	Compliance		
<b>Subsidiaries involved in the information sharing process</b>			
<b>Recipient subsidiaries (minimum perimeter)<sup>1</sup></b>	<b>Direct subsidiaries</b>	<b>Indirect subsidiaries</b>	<b>Other guidelines</b>
	Fineco Asset Management DAC (FAM)		

<sup>1</sup> In addition to the subsidiaries indicated above, each subsidiary may distribute the Global Rule to its own subsidiaries.

**Regulations replaced/revised and main changes made**

Regulations replaced /revised	Date regulations replaced/ revised	Rationale/Summary of main changes	Type of change <sup>2</sup>
		Establishment of principles for the strengthening of the culture of diversity, equality and inclusion at all levels of the organization	First Release

**Related Group Regulations**

Title	Rule number	Brief explanation of the connection
Global Policy on Gender Equality	FB 065_2024	This policy, together with other related policies, specifically addresses the issue of gender equality and its management in the Fineco Group.
Global Policy Combating harassment, sexually inappropriate behaviour and bullying	FB 038_2023	Tightly linked to regulations designed to promote diversity, inclusion and reputation.
Global Policy Remuneration Policy	FB 014_2024	Related to the principles of remuneration equity.
Global Policy on Recruitment Process	FB 036_2023	Correlation in terms of the relevance of the selection process to issues related to diversity and inclusion.
Global Policy Mandatory Training	FB 037_2023	Correlation in terms of the relevance of the training process to issues related to diversity & inclusion.
Global Policy Training and Professional Development	FB 039_2023	Correlation in terms of the relevance of the professional development process to the issues of diversity and inclusion.
Global Policy Whistleblowing	FB 064_2024	Correlation resulting from the possibility for employees to report unlawful behaviour.

<sup>2</sup> Minor change: approval of recipient subsidiaries not required – limited to correction/integration of typos.

First release / Replacement: approval of recipient subsidiaries required.

Global Policy HR policy framework	FB 023_2024	Main Human Resources document.
Global Policy Global Job Model: Principles and Maintenance	FB 080_2021	Correlation of the Global Job Model, which is the system that describes and evaluates all positions within FinecoBank with issues of equity, diversity and inclusion.
Global Policy Integrity Charter, Code of Conduct and Compliance Culture	FB 021_2023	Linking D&I issues to the principles to which all employees must adhere in order to ensure high standards of professional conduct and integrity in the performance of their duties.
Global Policy Human Rights Commitment - FinecoBank Group	FB 082_2020	Correlation with the Group's willingness to conduct its business in a manner that respects the full range of human rights.
Global Policy Sustainability Policy	FB 002_2024	Correlation arising from the specific topic which falls under Sustainability.
Global Policy FinecoBank Group Consolidated Sustainability Reporting	FB 067_2024	The Global Policy is the framework for the definition of compliance, governance and strategy for sustainability reporting.
Global Operational Regulation FinecoBank Group Consolidated Sustainability Reporting	FB 068_2024	The purpose of the GOR is to describe how the Consolidated Sustainability Reporting of FinecoBank S.p.A. and its subsidiaries is prepared.

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# 1 INTRODUCTION

FinecoBank S.p.A. and for Group Companies. FinecoBank S.p.A. within the scope of its role as a parent company - in compliance with applicable laws and regulations<sup>3</sup> as well as in accordance with the Group's management coordination system defined by the "Group Managerial Golden Rules" – issues guidelines in the interest of the stability of the Group in order to fully exercise its role of management and coordination.

This document (hereinafter "Global Policy" or "Policy") integrates the Group regulations, is directly applicable to the Parent Company<sup>4</sup> and is addressed to Group Subsidiaries.

In this context, this document aims to strengthen inclusion as a value at all levels of the organization, ensuring that the policies, procedures and behaviors that are implemented promote diversity, equity, and inclusion.

As established in the Management of the Group's Rules and Regulations Global Policy, this document shall be adopted complying with legal requirements and provisions in force at local level; in the event of any conflict between this Global Rule (hereinafter also GR) and the applicable local law (or in case of greater restrictions by the local law), the latter shall prevail.

After approval by Fineco's deputy bodies, Fineco, in its capacity as Parent Company, transmits the GR to the recipient Companies for approval by their respective Corporate Bodies and monitors its correct and timely implementation, also making use of its internal functions identified from time to time.

Group Companies are therefore required to promptly begin the necessary activities aimed at the correct application of this document, after appropriate assessment and approval by their competent bodies.

In the event that the Group Company considers that:

- this *Global Rule* is not applicable, or
- it is necessary to amend/make exceptions to the provisions in this *Global Rule*,

for the purposes of compliance with local legislation (if more restrictive) or due to organisational and operational constraints, the Group Company must request a Non-Binding Opinion to the Chief People Officer, in accordance with the provisions of the Group regulations in force (Management of the Group's Rules and Regulations).

## 1.1 Scope

This global policy is aimed at reinforcing the value of inclusion at all levels of the organization by ensuring that policies, procedures and behaviors promote diversity, equity and inclusion.

## 1.2 External Regulatory Framework

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<sup>3</sup> Internal and external regulations in effect as of the date of issuance of this document; subsequent updates where applicable from time to time

<sup>4</sup> In case of divergence between the Parent Company's Responsibilities set forth in these regulations and those set forth in the Regulations of Corporate Bodies, Bylaws, Internal Regulation, Delegated Powers of FinecoBank from time to time in force, the latter shall always prevail.

This policy reaffirms the Group's commitment to respect and actively promote the principles of diversity, equality and inclusion, including in the implementation of international standards and conventions (e.g. UN Global Compact Principles).

### 1.3 Glossary, Definitions and Acronyms

Key word	Definition
Parent Company	FinecoBank S.p.A. (hereinafter also "FinecoBank", "Fineco" or "Bank").
Group Companies	FinecoBank Group Companies, meaning the Parent Company FinecoBank itself and its Subsidiaries.
Group subsidiary	Company directly or indirectly controlled by FinecoBank S.p.A. (hereinafter also "Subsidiary" or "Subsidiary Company" or "Legal Entity" in short "LE").
Group	The FinecoBank Group, consisting of FinecoBank S.p.A. and the Companies/Legal Entities of the Group (hereinafter also "Fineco Group" or "FinecoBank Group").
Employees	All persons linked to FinecoBank and Group Companies by a contract of employment, as well as all members of the executive, strategic and control bodies.
Diversity	People's different characteristics that make them unique. Differences can be based on aspects such as gender identity, age, ethnicity, sexual orientation, ability, background, religious or ethical value systems and political beliefs or any other personal or professional characteristic protected by law in the local jurisdiction.
Inclusion	An environment in which all individuals are treated fairly and respectfully, have equal access to opportunities and resources and are empowered to contribute, providing a sense of belonging.
Equity	The principle that policies, processes and practices are applied impartially and can lead to equitable outcomes for each individual.
DE&I	Acronym for Diversity, Equity and Inclusion.
Impacts	The effect the undertaking has or could have on the environment and people, including effects on their human rights, connected with its own operations and upstream

	and downstream value chain, including through its products and services, as well as through its business relationships <sup>5</sup> .
<b>Relevant Risks</b>	Sustainability-related risks with negative financial effects arising from environmental, social or governance matters that may negatively affect the undertaking's financial position, financial performance, cash flows, access to finance or cost of capital in the short, medium or long term.
<b>Opportunities</b>	Sustainability-related opportunities with positive financial effects.

## 2 DIVERSITY, EQUITY AND INCLUSION STRATEGY

The Fineco Group is committed to upholding the values of diversity, equity and inclusion as fundamental pillars of the organization and a sustainable business development through the adoption of organizational and management measures characterized by respect for human rights and freedom.

Fineco operates with transparency and impartiality and does not allow any form of direct or indirect discrimination based on gender, age, sexual orientation and identity, disability, health status, ethnicity, nationality, political opinion, social category and religious belief, or any other personal, social or professional characteristic or condition. It also promotes the expression of individuals and the enhancement of differences within the organization, believing that the spread of a culture of inclusion at all levels of the organization is of strategic importance. Balanced and diverse teams are more likely to seize the opportunities presented by the dynamics that shape global society, thereby generating value for customers, the communities in which the Group operates, and shareholders.

Diversity, Equity, and Inclusion (DE&I) thus represent a set of core values to be promoted throughout the employee journey, from recruitment and onboarding, to training and development, from performance appraisal to compensation, and must be based on respect for diversity, appreciations of individual talents, meritocracy and equal opportunity.

Consistent with these Principles, Fineco is committed to:

- Create a heterogeneous and diverse environment to increasingly promote mutual enrichment, respect, listening and opening to others;
- Establish a corporate climate based on trust and collaboration, so that all people have a voice, allowing them to manifest their authenticity without any fear;

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<sup>5</sup> Commission Delegated Regulation (EU) 2023/2772 of 31 July 2023 supplementing Directive 2013/34/EU of the European Parliament and of the Council with regard to sustainability reporting principles, Table 2 - Definitions of terms used in ESRS.



- Recognize and value each person's skills, merits and talents by ensuring that business decisions are guided by transparency and principles of fairness and meritocracy;
- Use and promote inclusive and accessible language including communication style, and ways of organizing work that are respectful and inclusive;
- Provide accessible location of work, communication, company information and training activities;
- Spread the value of inclusion and accessibility within the Group, including through training and awareness-raising activities;
- Spread the value of inclusion and accessibility outside the Group. In this regard, it is also committed to promoting diversity principles (including gender equality) when organizing and participating in panels, working tables, seminars, and conferences especially when the subject matter relates to DE&I issues.

In this context, this document aims to develop a clear approach in terms of principles, mission, strategies, and active practices to foster a collaborative, inclusive work environment that is open to everyone's contributions to increase the confidence of people, customers, and, in general, all stakeholders.

The document is drafted in line with what is already affirmed by the internal regulations currently in force, such as, by way of example, the Code of Ethics pursuant to Legislative Decree 231 and the Group's Integrity Charter, Code of Conduct and Compliance Culture, which recognize the importance of an environment free from all forms of discrimination or harassment. This Policy reaffirms the Group's commitment to comply with and actively disseminate the principles set forth in current regulations, contractual provisions and standards issued by relevant international organizations.

The reporting on the Group's impact, risks and opportunities related to the principles of diversity, equity and inclusion is an integral part of the fulfilment that are implemented through the sustainability reporting included in the Consolidate Financial Statement and drawn up in accordance with the regulations in force from time to time on corporate sustainability reporting (Corporate Sustainability Reporting Directive, hereafter CSRD).<sup>6</sup>

## 2.1 Recruitment, appointment and promotion

Fineco Group strives to promote fairness and equal employment opportunities. Indeed, the decisions to employ, appoint and promote an individual are based solely on merit and competencies without discrimination of any kind.

Recruitment, appointment and promotions must ensure:

- Appropriate, inclusive and accessible language is used at all times, and discriminatory and non-inclusive criteria are avoided in job offers and in the definition of job responsibilities;
- all decisions are based on merit, granting procedures free from any bias;
- diversity, equity and inclusion are pursued in both external hiring processes and internal

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<sup>6</sup> At the enactment of this legislation: D. Lgs. no.125/2024. Legislative Decree No.125/2024, which transposes Directive 2022/2464/EU into Italian law.

- appointment process;
- the principles contained in this Global Policy are transferred to external partners active in selection and training processes (for example recruitment firms, public employment offices and executive search firms).

## **2.2 Learning and development**

Fineco is committed to ensuring that people can fully express their skills, abilities and potential. For this reason, each Group Company is committed to providing equal development opportunities (such as, but not limited to, training, coaching, on-the-job development activities), without discrimination of any kind.

To sensitize the entire organization to a culture that embraces the inclusion of diversity in all its forms and meanings and overcomes stereotypes, the Group makes available to all employees training and awareness-raising initiatives on valuing differences, inclusion and gender equality.

## **2.3 Compensation**

The Fineco Group aims to attract, retain and motivate highly qualified resources by fostering a work environment that is inclusive of all forms of diversity and capable of fostering the expression of individual potential. For this reason, the remuneration of employees is based on the role, the scope of responsibilities, performance outcomes and the overall quality of the contribution to business results, without discrimination of any kind.

In particular, the Fineco Group is committed to ensuring that its remuneration policy is gender neutral by contributing to the pursuit of equal opportunities in terms of professional and salary development (compensation and benefit).

## **2.4 Work-life Balance**

The Group strongly believes that a positive and inclusive environment based on respect enables each colleague to contribute at their best to the organizational success improving the management of work-life balance.

For this reason, each Group company is committed to improving the well-being, dialogue and motivation of its employees by increasing the provision of services and tools to support work-life balance needs and individual vulnerabilities.

## **3. RESPONSIBILITIES**

This Global Policy aims to embed the concepts of diversity, equity and inclusion at all levels of the organization. Therefore, all employees play an active role and are responsible for its application. Specific functions play a key role in the implementation process, as outlined below.

### **3.1 Responsibilities of the Group Companies**

**The HR function of each Group Company** is responsible for ensuring that impacts, risks, and opportunities in relation to the principles of diversity, equity, and inclusion are managed through:

- monitoring the implementation of the Group principles of diversity, equity and inclusion in line with this Global Policy and with other internal and external regulations in force from time to time;
- spreading awareness of the importance of a work environment where diversity is valued;
- monitoring the data related to recruitment, appointment and promotions and any other information time by time required.

**The Group HR function is responsible for:**

- updating and amending, as needed, the D&I Global Policy;
- receiving from the Subsidiaries the results of the local implementation;
- receiving from the Group Companies the data related to recruitment, appointment and promotions any other information time by time required.

**The Diversity Manager of the Fineco Group is the Head of People Management & Development of FinecoBank** and is responsible for monitoring the initiatives to implement the contents of this Global Policy by fostering its effective development together with the Rule Owner and the parties involved from time to time for their respective areas of responsibility, as indicated below.

**The heads of the organizational structures of the Group Companies** must ensure in the execution of their role:

- their colleagues' awareness and full understanding of the principles set forth in this Global Policy;
- personal understanding of this Global Policy so that questions, concerns and complaints are handled effectively and with due sensitivity;
- the selection appointment and promotion of employees of employees that are free from discriminatory factors;
- performance appraisal, remuneration and professional development opportunities based on meritocratic criteria and without discrimination of any kind.

**All employees** are responsible for promoting a culture of inclusion and respect for diversity. Therefore, this Policy applies only to the Group's own activities. Any behaviour inconsistent with the principles contained in this document may be reported through the channels provided by the Global Whistleblowing Policy in force in each Group company.



**FINECO**

ASSET  
MANAGEMENT

Fineco Asset Management D.A.C. is part of the FinecoBank Group. Fineco Asset Management D.A.C. is regulated by the Central Bank of Ireland.