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Anti-harassment Policy

Responsible Structure: HR & Organization, IR & Sustainability

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Index

1	REGULATORY CONTEXT AND SCOPE	3
2	DEFINITIONS AND PRINCIPLES	4
2.1	Harassment.....	4
2.2	Sexually inappropriate behaviour	4
2.3	Bullying and mobbing	5
3	GROUP COMMITMENT	5
4	REPORTING PROCESS AND PROTECTION OF CONFIDENTIALITY	5
5	DISCIPLINARY ACTIONS.....	6
6	INFORMATION FLOWS TO THE ODV.....	7
7	RELATED LEGISLATION.....	8

1 REGULATORY CONTEXT AND SCOPE

International and industry norms and agreements, the illimity Way, and the values enshrined in the Diversity, Equity & Inclusion Policy inspire this policy to support the commitment of illimity Bank S.p.A. and the companies of the Group (as referred to in this document), from now on referred to as "illimity" or the "Group," to ensure and maintain a safe, inclusive and harassment-free working environment, free from sexually inappropriate behaviour and bullying.

This Policy aims to prevent and promptly detect the abovementioned phenomena and protect whistleblowers from possible retaliation. All Group employees must abide by the rules in this Policy and be mindful of their verbal and non-verbal behaviour.

This Policy is also inspired by the *Voluntary Recommendations on the Elimination of Violence and Harassment in the World of Work* defined by the International Labour Organisation (ILO 190), which provides an organic framework for action to describe a workplace based on dignity and respect, free from violence and harassment of any kind. The document expresses illimity's commitment to preventing and combating physical or psychological harassment, bullying, coercion, harassment, or any other attitude that may cause discomfort or fear.

illimity believes in fully realizing human rights and fundamental freedoms as proclaimed in the Universal Declaration of Human Rights, adopted by the United Nations General Assembly in 1948, and endorsed for business activities in the Guiding Principles on Business and Human Rights. The Group fully respects human dignity and rights and is committed to building and maintaining an inclusive, fair, and diverse work environment. The Group considers any harassment, bullying, or sexually inappropriate behaviour to threaten the dignity of the person subjected to it, recognising that certain acts can affect physical and/or mental health, motivation and work performance, the organisational climate, and the Group's reputation.

The Group does not tolerate any form of racism, bullying, harassment, or any other form of physical or psychological discrimination and urges its stakeholders to avoid any phenomena that may create barriers or social obstacles.

illimity is actively committed to ensuring that all employees are aware that forms of bullying, harassment, or racism are sometimes insidious and not immediately apparent. To this end, all *illimity* employees are provided with specific mandatory training to equip them with the necessary skills to identify and recognise such behaviour and to promote a respectful and inclusive working environment. Within the organisation and the broader ecosystem in which illimity operates, appropriate measures have been implemented to prevent, intercept, and sanction any form of discrimination.

The Policy applies to all illimiters (employees, permanent collaborators, and interns). It applies inside and outside the company's offices and in all work contexts.

Although the Group does not have the power to control the behaviour of third parties¹, it does not tolerate any harassment, sexually inappropriate behaviour, bullying, or *mobbing* involving such third parties.

It should be noted that concerning the assessment of the risk of any form of physical, verbal, or digital abuse (harassment) in the context of health and safety in the workplace, as provided for by UNI/PdR 125:2022 for the Certification for Gender Equality, given the nature of the workplaces made available to *illimiters* and the physical safety measures provided for and also regulated by the Health and Safety Policy, no high risk has been identified. In any case, efforts to prevent such acts are defined in this Policy.

The provisions in this document apply to all entities of the illimity Group, which are subject to the management and coordination of the parent company; illimity Bank S.p.A. Group companies are therefore required to comply with this document.

¹ Suppliers, agents, consultants, professionals, business partners, independent or subcontracted workers, etc. who, as outsiders to the Parent Company or other Group companies, collaborate in the performance of their activities.

2 DEFINITIONS AND PRINCIPLES

The purpose of this document is to promote the principle of mutual respect in every aspect of an employee's working life in the hope that these values will also be pursued outside the workplace to encourage a culture of preventing and combating all forms of harassment, sexually inappropriate behaviour, discriminatory behaviour, and bullying.

Less favourable treatment suffered by an *illimiter* for refusing to engage in harassment or sexually inappropriate behaviour is also considered discriminatory.

2.1 Harassment

Harassment is defined as any attempted or actual conduct, whether isolated or systematic, and repeated with the intent to harass, which creates an inappropriate working environment, interferes with work performance, and undermines a person's dignity. It includes, for example, insults, intimidation, defamation, leaking of confidential information, innuendo, and any other action that discredits the individual.

Therefore, all forms of harassment based on sexual orientation and preference, geographical origin, physical characteristics, religious beliefs, ideology, gender identity or expression, age, disability, marital or civil union status, foreign national or citizen status, ethnicity, genetic predisposition, physical/aesthetic characteristics, pregnancy and parenthood, medical condition, status as a victim of violence, unemployment or any other category protected by Italian law are prohibited.

The definition of harassment includes verbal, non-verbal, email, and all forms of instant messaging.

2.2 Sexually inappropriate behaviour

Sexually inappropriate behaviour or sexual harassment is defined as any unwanted physical, verbal, or non-verbal act or conduct of a sexual nature, which is directed at a person because of that person's gender or status (including pregnancy status), gender identity or expression (including LGBTQIA+) and sexual orientation, or which in any case violates the dignity, freedom, and integrity of the person.

Such conduct is more severe if it occurs in the workplace, is implicitly or explicitly linked to work-related decisions, or the purpose of which is to interfere with the individual's work performance, or in any case, creates an intimidating, hostile, or offensive working environment.

The Group expressly prohibits any form of discrimination based on sex that violates the principle of equal treatment of women and men.

The following are examples of conduct that may constitute examples of sexually inappropriate conduct prohibited under this Policy:

- Sexist behaviour and verbal comments that may be hostile, offensive, or imply an inferior view of the opposite sex or sexual orientation of the person to whom they are directed;
- Inappropriate and offensive behaviour intended to cause unwanted physical contact or assault;
- inappropriate and offensive behaviour aimed at soliciting sexual services, aggravated when it is accompanied by threats of negative consequences at work or in one's career, as well as the promise of rewards and/or benefits related to work, including gestures, sexual jokes, provocations, inappropriate winks, vulgar or inappropriate remarks about a person's physical appearance or anatomical body parts;
- Exchanging pornographic material in the workplace, including in electronic format;
- Using sexist criteria in any type of interpersonal relationship, including remarks, references to appearance or clothing with sexual connotations, and comments based on sexual stereotypes that could create a non-inclusive and hostile work environment.

2.3 Bullying and mobbing

Bullying and harassment are defined as repeated verbal, non-verbal, and/or physical behaviour to threaten, intimidate, or humiliate an individual, as well as any harassing behaviour towards an employee to damage their psychological and physical integrity or drive them out of the company.

This definition includes behaviour designed to sabotage or damage the work performance of others.

Examples of harassment include both overt and covert behaviour, including provocation, oppressive behaviour, exclusion, humiliation, insults, slander, physical and verbal aggression, ostracism, and hostile acts against an employee because of their gender or sexual orientation (e.g. damaging equipment or workspace, sabotaging work, or bullying).

Some examples that may be attributable to *bullying* at work include:

- Marginalisation of the worker;
- Assignment of de-qualifying tasks;
- Unjustified criticism and humiliation in front of other employees;
- Defamation or slandering of the employee;
- Threats or intimidation.

3 GROUP COMMITMENT

The Group is committed to providing a working environment that is free from harassment, abuse, or discrimination and to ensure that all incidents of harassment, bullying, or other sexually inappropriate behaviour are promptly reported.

To this end, illimity commits to:

- Developing training plans for all employees to promote knowledge, understanding, and effective management of diversity, inclusion, and all conscious and unconscious biases to prevent offensive, discriminatory, harassing, and denigrating behaviour in line with the content of this Policy, the Illimity Way and the Diversity, Equity & Inclusion Policy;
- Ensuring that the search for and selection of new *illimiters* for all roles in the Group, including management, is the result of a process based on *diversity neutrality*, ensured by using an unbiased talent acquisition model;
- Adopting specific structured reporting processes and internal control mechanisms put in place to mitigate the potential occurrence of bullying, harassment, or other inappropriate behaviour;
- Providing appropriate safeguards to ensure the confidentiality of the personal data of the reporter and the alleged perpetrator;
- Ensuring adequate protection of the whistleblower against retaliatory, discriminatory, or otherwise unfair conduct following the report in a climate of respect for the whistleblower's dignity. Any direct or indirect retaliation or discrimination against the whistleblower for reasons directly or indirectly related to the whistleblowing is prohibited.

The Group's commitment is measured by the Great Place to Work® survey, a leading independent company in Italy in the study and analysis of the workplace environment.

The questionnaire, distributed to the entire Group each year, allows us to investigate employees' perceptions of their working environment and related well-being.

4 REPORTING PROCESS AND PROTECTION OF CONFIDENTIALITY

A structured and formalised reporting and handling process is in place to identify and manage harassment, bullying, and sexually inappropriate behaviour.

The reporter of an alleged violation may submit the report, either anonymously or by name:

- through the modalities set out in the company's Whistleblowing Policy, which should be referred to;
- to the Chief HR & Organization Officer, as the contact person for the structure responsible for monitoring and ensuring compliance with the principles of diversity, equity, and inclusion, who will forward it to the Whistleblowing Officer within three days of receipt, following the Whistleblowing Policy of the company concerned.

Once the report is received by the Internal Violation Reporting System Manager or the Chief HR & Organization Officer, the analysis process is initiated immediately, in collaboration with HR & Organization. Investigations will be conducted promptly, impartially, independently, and strictly confidential at all levels, from receipt of the report to the conclusion of the process. Confidentiality applies to the facts under investigation, the person(s) involved and/or named, the subject of the report, the process followed, the materials and information gathered, and the results of the process. Everyone involved in the investigation must not disclose any information to anyone not directly involved. The procedure adopted by the Company guarantees the confidentiality of the personal data of the whistleblower and the alleged perpetrator per the provisions of the Data Protection Act.

In addition, no person with a conflict of interest should be involved in the investigation or decision-making process.

The outcome of the investigation will be communicated to the reporting party within no more than three months from the date of confirmation of receipt of the report.

illimity also adequately protects the reporter 'against retaliatory, discriminatory or otherwise unfair conduct arising from the report' in a climate of respect for the reporter's dignity.

In particular, in accordance with Legislative Decree 24/2023 on *whistleblowing* and this policy, any direct or indirect retaliation or discrimination against the whistleblower for reasons directly or indirectly related to whistleblowing is prohibited. Retaliatory dismissals and organisational measures that directly or indirectly negatively impact working conditions are null and void unless proven that they are not retaliatory and are based on reasons unrelated to whistleblowing.

The whistleblower's protection also applies if the report or disclosure is made before or after the legal relationship has commenced or terminated.

Intermediaries and persons working in the same employment context with a habitual or family relationship with the whistleblower also benefit from the abovementioned protection.

Finally, it should be noted that, where necessary, all reports will be dealt with by the law, considering the relevant legal provisions.

5 DISCIPLINARY ACTIONS

If the investigation confirms harassment or sexually inappropriate behaviour or, more generally, behaviour that violates the provisions of this policy, the illimity way, or the Diversity, Equity & Inclusion Policy, the employee will be subject to disciplinary action.

In particular, the appropriate disciplinary measures will be assessed by the applicable regulatory provisions depending on the seriousness of the actions and the investigation. The following are examples of, but not limited to, some of the relevant disciplinary measures:

- A warning letter to the person responsible for the harassment, stating that the behaviour is unacceptable and that further offences will result in more severe sanctions;
- Temporary suspension in the case of persistent harassment, also possibly following warnings;
- Removal from management positions if the offending individual is in a position of responsibility (manager) or supervision (*Team Leader*);
- Dismissal in the case of severe or persistent harassment. In such situations, illimity will also consider whether to take legal action.

In such circumstances, the applicability of the provisions of the Procedure for the application of *malus and clawback* mechanisms will also be assessed by reference to the impact of the reported conduct on the variable component of the remuneration of the employee responsible for the violation.

In addition, depending on the severity of the acts and the investigation carried out, mandatory training courses specific to the type of harassment must be included in the individual training plan.

Finally, the internal disciplinary system provided for by Legislative Decree No. 231/2001 applies in the following cases:

- Violations of the confidentiality of the identity of the whistleblower or the prohibition of discriminatory or retaliatory acts;
- The sending of an alert is obstructed;
- The analysis and verification of the reports received is not carried out.

6 INFORMATION FLOWS TO THE ODV

The structures responsible for this document shall immediately notify the Supervisory Body of any breach of the rules of conduct and the implementing procedures laid down in this Policy. More generally, all employees are required to report to the Supervisory Body any violation of the principles contained in the Internal Regulations, the illimity Way, and the Organisation, Management, and Control Model adopted by the Parent Company and the other Group Companies according to Legislative Decree 231/2001.

In the absence of violations, the structures responsible for the document shall send at least once a year a communication indicating the lack of reports and/or relevant information to the Supervisory Board by writing to segnalazioni231@illimity.com.

7 RELATED LEGISLATION

RELATED INTERNAL REGULATIONS

illimity Way
Policy Diversity, Equity & Inclusion
Whistleblowing Policy
Organisation, Management and Control Model according to Legislative Decree 231/01
HR Procedure
Procedure for the application of <i>malus</i> and <i>claw back</i> mechanisms related to individual conduct

RELATED EXTERNAL REGULATIONS AND GUIDELINES

ILO - C190 - Convention on the Elimination of Violence and Harassment in the World of Work, 2019
ILO - R206 - Recommendation on the Elimination of Violence and Harassment in the World of Work, 2019
Guiding Principles on Business and Human Rights
Joint statement on harassment and gender-based violence in the workplace - Abi and Fabi, First-Cisl, Fisac-Cgil, Uilca, Unisin Falcri Silcea Sinfub
UN Universal Declaration of Human Rights