



Group directive on abusive behaviour, bullying and harassment

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1. Introduction

This directive is related to the Group's:

- Code of ethics;
- Code of conduct;
- Disciplinary code;
- Organizational, management and control model instituted pursuant to Italian legislative decree 231/01;
- Group Whistleblowing Policy;
- Group Sustainability Policy;
- Group directive on compliance breaches;
- Group Human Resource Management Policy.

2. Directive on abuse, bullying and harassment

The Mediobanca Group (the “Group”), as stated in the Group Human Resource Management and Group Sustainability Policies currently in force, guarantees equal opportunities for all of its staff and human resources regardless of the employment arrangements by which they are linked to the Bank (i.e. interns, collaborators, staff employed on a contract basis, etc.), and also for candidates aspiring to professional positions.

Our staff members are our **human capital** and the indispensable foundation of the Group’s **competitiveness**. For this reason the Mediobanca Group’s Human Resource Management Policy is based on a series of **non-negotiable general principles contained in it**.

In particular the Group guarantees that all the above persons are treated without distinction, exclusion, restriction or preference, whether direct or indirect, based on:

- Age, gender, sexual orientation, civil status, religion, language, ethnic or national origins, physical or mental disabilities, pregnancy, parenthood (including adoption), personal convictions, political opinions, trade union affiliation or activity;

with regard to:

- Access to work, assignation of duties and qualifications, transfers, disciplinary proceedings, promotion and professional training, including professional and career progression, working conditions including pay, complementary pension provisions and benefits.

Protection of workers’ health and psychological and physical well-being at all levels is also achieved by adopting specific **prevention and protection programmes**, ensuring that all levels of the company take responsibility for this area.

2.1 General principles

ABUSIVE BEHAVIOUR, BULLYING AND MOBBING

The Group believes that any form of systematic or deliberate conduct on the part of a line manager or colleague towards other persons operating in the same working environment, consisting of hostile behaviour, abuse of power or psychological persecution, which can lead to the moral humiliation and/or exclusion of the person concerned, with damaging effects on their physical and psychological well-being and that of their personality as a whole, to be gravely reprehensible.

This is aimed in particular at behaviour engaged on a continuous basis with the intention to harass.

VIOLENCE, HARASSMENT AND STALKING

The Group believes that the exercise, in the workplace, of any form of harassment, in the sense of any form of unsolicited behaviour, expressed in physical, spoken or unspoken form, engaged in with the purpose or the effect, in its own right or on account of its persistence, of violating the dignity and civil liberties of an employee and creating a climate which is intimidatory, hostile, degrading, humiliating or offensive, to be gravely reprehensible.

2.2 Recruitment and career progression

As stated in the Mediobanca Group Human Resource Management Policy currently in force, to which reference is made, every announcement of possible selection processes is an encouragement to all individuals in possession of adequate qualifications and/or professional experience requested to apply. The same principle underpins assessments that take place with respect to opportunities arising within each individual Group company (transfers between organizational units) or the Group as a whole (intra-Group transfers).

- The criteria and procedures for selection are established in order to ensure that the candidates are assessed objectively on the basis of their merits, experience and abilities.
- The Group may not offer terms and conditions which are discriminatory or which violate the laws and regulations in force in this connection.
- All promotions, pay adjustments, assignation of any bonuses or any other type of organizational, training and operational action that impacts on individuals are related exclusively to the duties performed, the role covered and the objectives set and delivered.
- Where possible and appropriate, specific training and support will be provided to ensure equal opportunities within the Group, and to prevent behaviour featuring forms or acts of bullying or harassment from occurring.
- Special requests regarding the observance of religious rites (e.g. holidays and ceremonies) or cultural practices (e.g. wearing traditional dress) will be considered and treated on the basis of the provisions of the law currently in force.
- The Group will devote particular attention to supporting workers with specific family requirements.

2.3 Scope of application

- This document applies to all the Group's members of staff¹ employed on permanent or non-permanent contracts, full time or part time, on a contract or staff leasing basis, and interns and consultants working on the Group companies' premises (jointly, the "Workers").
- All Workers are bound to act in observance of the directive's provisions, and accordingly to refrain from discriminatory or offensive behaviour.
- The provisions of point ii) above apply not just to the behaviour adopted vis-à-vis other Workers, but also with respect to candidates for positions in the Group, visitors, clients and suppliers.

2.4 Internal reporting procedure

- Any Worker who considers themselves to have been the object of discrimination of any form or of acts of bullying or harassment is expressly encouraged to contact the relevant Human Resources department on a confidential basis, if possible in writing to ensure the case is documented, and/or in the form of a meeting, providing details of the incident, any supporting material to demonstrate the incidents they are reporting, and any witnesses. Human Resources will formalize the outcome of the meeting in the form of a memo to be agreed with the Worker who made the report, which they will sign and which will be kept in the company records.
- If the incident should involve Human Resources, the report should be made on the terms described above but addressed to the General Manager.
- Such reports may also be made anonymously, but will result in limits on the possibility of carrying out indepth enquiries into the incident.
- Each individual case will be treated with the utmost confidentiality, and every report made in good faith shall in no way affect subsequent career progression.
- Once the necessary enquiries have been made, the Human Resources department, if possible having sought the Group Audit and/or Compliance units' opinions, may take the operational and organizational measures it considers necessary, including those provided for under the disciplinary code (which are incremental and may ultimately lead to dismissal and to criminal charges being made if appropriate) with respect to situations considered to be actual instances of discrimination, in accordance with the relevant procedures, and to be an active party, where permitted under the national regulations in force, in reporting the incidents to the relevant authorities.
- All certified reports must be notified to the relevant company's general management, and the most serious cases to Group HR and the General Manager of Mediobanca S.p.A. Cases with criminal law implications must also be reported to the Statutory Audit Committee.
- The heads of units and offices are responsible for preventing any discrimination, bullying and harassment in the workplace. Any person who witnesses acts of discrimination, bullying and harassment must show solidarity to the victim and serve as a witness if necessary. To this end, co-operation with the relevant units will be taken into consideration in the course of the company's performance assessment process.

1. The Italian Group companies are required to adopt this Directive themselves. The non-Italian Group companies must at least ensure that the principles described in this document are contained in their respective internal regulations.



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All photos and other images are of Mediobanca offices and buildings