

Annex 1

This Policy is an essential document in the path to sustainability that the BPER Group has chosen to pursue.

In particular, the Policy sets out the principles that inform the rules required to ensure i) integrity and transparency, ii) social development, iii) good business practices and customer protection, iv) protection of workers, diversity and equal opportunities and v) incorporation of sustainability into value creation and environment protection, identifying the functions that are responsible for these activities.

Reported below is a description of the ESG principles and related actions that the BPER Group has initiated (in bold) and intends to initiate, in line with content of the Business Plan.

BPER guiding principles	Targets (2022-2025 Business Plan)	Actions	Area	SDGs
1. Integrity and transparency	<p>ESG Infusion – across the board Redesigning the internal Organisational Model to define ESG roles and responsibilities</p> <p>ESG Infusion - Simple and Digital bank Implementing the Principles for Responsible Banking</p>	<ul style="list-style-type: none"> • Commitment to fight against corruption and ensure increasingly greater transparency and accountability • Code of Ethics • Organisational Management Model (Legislative Decree no. 231) • Whistleblowing Procedures • Internal Governance Code • Anti-corruption Policy • Anti-Money Laundering Policy • Participation in the UN Global Compact • Reporting on sustainability issues 	Governance	SDG 16 - Peace, justice and strong institutions

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2. Development of society	<p>ESG Infusion – National-scale multi-specialist Products for the third sector</p> <p>ESG Infusion - People at the centre Financial education by young people for young people (in collaboration with universities)</p> <p>Loans of honour for university students</p> <p>ESG Infusion – across the board Partnership with national organisations to promote social inclusion of the weaker sections of society</p> <p>Expanding the proposition of ESG investment products and ESG AuM</p> <p>ESG Infusion - Simple and digital bank Incorporation of ESG criteria in the Company's procurement choices</p> <p>Initiatives in support of culture and promotion of artistic and museum heritage</p>	<ul style="list-style-type: none"> • Sponsorships/Donations for projects with positive social/cultural impact • Sustaining activities in support of communities and local development • Donations/sponsorships for projects to address educational emergency • Financial inclusion activities, e.g. microcredit services • Products / services with social purposes • Financial inclusion projects for customers with disabilities (e.g. visual or hearing impairment) • Projects against compulsive gambling • Investments in financial products with positive social impact • Projects of financial education for schools at all levels • Projects of financial education for adults • Creation of educational partnerships (e.g. with <i>Fondazione per l'Educazione Finanziaria e per il Risparmio - FEduF</i>) • Incorporation of ESG criteria in the Company's procurement choices • Increased lending to Non-Profit Organisations • The Gallery - <i>La Galleria</i> 	<p>Social</p> <p>Governance</p>	<p>SDGs 1 - No poverty</p> <p>SDGs 4 - Quality education</p> <p>SDGs 11 - Make cities and human settlements inclusive, safe, resilient and sustainable</p>

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<p>3. Good business practices and customer protection</p>	<p>ESG Infusion - Simple and Digital Bank Accessibility to D&I products and services</p> <p>ESG Infusion – National-scale Multi-specialist Upgrade of credit processes with the incorporation of ESG criteria</p> <p>ESG Infusion – across the board Expanding the proposition of ESG investment products</p> <p>ESG Infusion – Transformation into a fee-based revenue model Rating of Corporate customers with an ESG score</p> <p>ESG Infusion – IT and Business partnership for transformation and growth Improved ESG data and indicators collection/management process for Corporate customers</p>	<ul style="list-style-type: none"> • Creation of financial products/marketing of investment solutions with a positive social/environmental impact • Upgrade of credit processes with incorporation of ESG criteria • Products/services with D&I purposes • Products /services with social/environmental purposes • Creation of an ESG score for corporate customers • Improved ESG data and indicators collection/management process for Corporate customers 	<p>Social</p> <p>Environmental</p>	<p>SDGs 4 - Quality education</p> <p>SDGs 12: responsible consumption and production</p> <p>SDG 13- Climate action</p>

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<p>4. Protection of workers, diversity and equal opportunities</p>	<p>ESG Infusion -People at the centre Gender gap project</p> <p>Incorporation of ESG targets in remuneration policies</p> <p>Dissemination of the ESG culture via upskilling/reskilling and ESG awareness raising programmes</p> <p>ESG Infusion -People at the centre Encourage agile work and work/life balance including via the rationalisation of HQ locations (new workplace)</p>	<ul style="list-style-type: none"> • Implementation of in-house projects on gender gap • Dedicated training activities • Commitment to continuous training for employees • Work from home • Company Welfare plan • Creation of partnerships with national welfare players (e.g. Valore D) • “Sustainable Mobility” project • “Sportello di ascolto” counselling service • Protection of the health of workers • Maintaining Top Employer Certification • IT projects for innovation and development • Expansion of work from home 	<p>Social</p> <p>Environmental</p>	<p>SDGs 5 - Gender equality</p> <p>SDGs 8 - Decent work and economic growth</p>

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<p>5. Incorporation of sustainability into the creation of value and environmental protection</p>	<p>ESG Infusion – across the board Reduction of Group emissions, with science-based targets in line with the Paris Agreement</p> <p>Increasing use of electricity from renewable sources</p> <p>Expanding the proposition of ESG investment products and ESG AuM</p> <p>ESG Infusion - People at the centre Encourage agile work and work/life balance including via the rationalisation of HQ locations (new workplace)</p> <p>ESG Infusion – Simple and Digital Bank Incorporation of ESG criteria in the Company's procurement choices (Minimum Environmental Criteria)</p> <p>Paper waste reduction (%)</p> <p>Implementation of the Net-Zero Banking Alliance</p> <p>ESG Infusion – IT and Business partnership for transformation and growth Rationalising the IT architecture in a sustainable perspective («Hybrid Cloud», <i>datacenter</i>)</p>	<ul style="list-style-type: none"> • Purchase and production of electricity from renewable sources • Projects for energy efficiency and purchase of electricity from renewable sources • reduction of impacts from the corporate fleet. • Reduction of direct environmental impacts • Purchase of electricity from renewable sources • Purchase of recycled paper and/or paper with ecolabel • Environmental risk management (ECB Guidelines) • Digitisation/dematerialisation projects • Development of financial services for projects associated with the production/use of renewable energy for retail and corporate customers • Creation and marketing of products and services to promote energy efficiency • Creation and marketing of products and services to promote the development of renewable energy • Creation and marketing of products and services to promote sustainable mobility • Financing of infrastructure projects with positive social and environmental impact • Dedicated retail loans 	<p>Environmental</p> <p>Governance</p>	<p>SDG 7 - Affordable and clean energy</p> <p>SDGs 9 - Industry, innovation and infrastructure</p> <p>SDGs 11 - Sustainable cities and communities</p> <p>SDGs 12 - Responsible consumption and production</p> <p>SDGs 13 - Climate Action</p> <p>SDGs 15 - Life on Land</p>

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	<p>ESG Infusion – Transformation into a fee-based revenue model Intensification of green lending and advisory (sectors/supply chains, NRRP, 110% superbonus, green mortgage loans, ...)</p> <p>ESG Infusion – National-scale multi-specialist Risk Management Framework with climate factors</p>	<ul style="list-style-type: none"> • Creation of financial products/marketing of investment solutions with a positive environmental impact • Investments in financial products with a positive environmental impact 		