



# **Policy for the management of human resources**

Modena, 19/09/2024

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## CONTENTS

<b>1</b>	<b>General aspects</b> .....	<b>3</b>
<b>2</b>	<b>Definitions</b> .....	<b>4</b>
<b>3</b>	<b>Content of the Policy</b> .....	<b>5</b>
<b>3.1</b>	<b>Personnel management policies</b> .....	<b>5</b>
3.1.1	Strategic Planning .....	6
3.1.2	Talent attraction .....	6
3.1.3	Recruiting .....	6
3.1.4	Onboarding .....	7
3.1.5	Training .....	7
3.1.6	Professional development .....	7
3.1.7	Performance Management .....	8
3.1.8	Active listening .....	9
3.1.9	Career paths .....	9
3.1.10	Succession Plans .....	9
3.1.11	Total Reward .....	9
3.1.12	Employee Relations .....	10
3.1.13	Offboarding .....	11
3.1.14	Staff participation in external events .....	11
<b>3.2</b>	<b>HR administrative processes</b> .....	<b>11</b>
<b>4</b>	<b>Annexes</b> .....	<b>13</b>
4.1	Version History .....	13
4.2	Regulatory framework .....	14

## 1 General aspects

This Policy regulates and formalises the principles and general guidelines with which the BPER Group intends to pursue its strategic objectives in human resources management, and aims at supporting resources throughout their working life, from recruiting to offboarding, as described in the following chapters.

The Bank of Italy requires that, among the general organisational principles, the strategic supervisory body should approve the human resources management policy in order to ensure that "employees have the necessary skills and professionalism to carry out their assigned tasks".

In line with the described framework, the BPER Group has adopted policies for the management of human resources, which outline the fundamental principles in coordination with the other policies and corporate codes impacting the management of personnel and promoting general and essential precepts:

- sustainability: growth and sustainability of the Group, through management processes centred on people as fundamental assets for growth, competitiveness and innovation;
- ethics and integrity: promotion of a culture based on values of fairness, responsibility and personal ethics;
- equality and inclusion: commitment to enhancing equal opportunities and promoting diversity and inclusion as essential components for the growth of the Group;
- equity and transparency: commitment to ensuring that all personnel management is carried out in a transparent and documented manner, avoiding all forms of potentially corrupt conduct and managing potential conflict situations;
- human rights, dignity and freedom: commitment to preventing any undesirable behaviour, expressed in physical, verbal or non-verbal form, with the purpose or effect of violating a person's dignity and freedom. These rights are promoted and protected in compliance with the "UN Guiding Principles on Business and Human Rights", "The OECD Guidelines for Multinational Enterprises", the "International Labour Organisation's Declaration on Fundamental Principles and Rights at Work";
- diligence and confidentiality: promotion of behavioural standards underpinning the Group's reputation, through the principles of the Corporate Governance Code and Code of Ethics;
- health and safety: protection of health and safety at work and employees' mental and physical well-being, pursued through specific prevention programmes, information and training activities for the company's entire population.

This document has been drawn up with the intention of pursuing a Group-wide shared logic of management and development of human resources that contributes to the creation of a shared sense of belonging, to be construed as a continuous stimulus, source of motivation and commitment for all personnel.

### **Preparer:**

Chief Human Resource Officer

### **Approver:**

Board of Directors

### **Recipients of the document:**

Banks		Companies		
Italian		Ancillary	Financial	Other subsidiaries*
x	Bper	MO Terminal	- Credit	Adras
x	Bibanca	Bper Real Estate	x Bper Factor	Arca Holding

<sup>1</sup> Supervisory Provisions for Banks - Bank of Italy Circular 285/2013 as later updated, in particular Part I, Title IV, Chapter 3, Section I, Paragraph 6

x	Banco di Sardegna		Bper Trust Company	x	Sardaleasing		Commerciale Piccapietra
x	Banca Cesare Ponti			x	Finitalia		St. Anna Golf
	Abroad				- Non-Credit		St. Anna Gestione Golf
x	Bper Bank Luxembourg				Estense C. Bond		Annia
					Estense C.B.CPT		
					Arca Fondi SGR		
					Carige C. Bond		
					Lanterna Finance		
					Lanterna Mortgage		

\*included in the scope of consolidation but not part of the Banking Group

## **Process Tree**

Process Tree	Description
Area	Support processes
Macroprocess	Human Resources

## **2 Definitions**

**BPER Banca Group or BPER Group or Group:** the Group headed by BPER Banca S.p.A., including all its Subsidiaries, even external to the banking group.

**BPER Banca or BPER or Bank or Parent Company:** BPER Banca S.p.A., parent company of the BPER Banca Group

**Subsidiaries or Companies:** the Italian or foreign BPER Banca Group companies, as well as the other Italian or foreign companies directly or indirectly controlled by BPER Banca, pursuant to Art. 93 of the Consolidated Law on Banking

**Human Resources Function (or, for brevity, Human Resources):** for the purposes of this document, it means the Organisational Units of the Parent Company reporting to the Chief Human Resources Officer and/or the corresponding organisational structures, if any, at the various Group Companies

**Employer branding:** strategy to create and promote the company's reputation as an ideal employer, with a view to attracting, inspiring and retaining talents

**Gender pay gap:** the difference between the average annual remuneration for men and women

**HR analytics:** the collection, analysis and interpretation of human resources data

**Upskilling and reskilling:** process aimed at improving, developing and requalifying skills

**Recruiting:** process for the recruitment and selection of resources

**Onboarding:** set of activities to provide new hires with the necessary tools to become operational and integrated into the corporate structure

**Offboarding:** describes the phases of the separation process when an employee leaves the company

**Wellbeing:** strategy aimed at enhancing the individual wellbeing of the person which is implemented through the provision of welfare services and the pursuit of the objectives of work-life balance and protection of occupational health and safety .

**International Labour Organization (ILO):** international organisation devoted to promoting social justice, human and labour rights. Sites are selected on the basis of cultural, historical, scientific value

or other forms of relevance, and are legally protected by international treaties

**International Labour Organisation's (ILO) Declaration on Fundamental Principles and Rights at Work:** The Declaration on fundamental principles and rights at work as subsequently amended and supplemented was adopted by the International Labour Conference in June 1998. It contains the fundamental principles that the ILO member States must respect by virtue of their membership in the Organisation, even if they have not ratified the ILO conventions in which those principles are set forth.

### 3 Content of the Policy

The context of operation of the BPER Group, which has undergone significant changes in recent years, has led the company to stand up to new challenges and new needs. Over time, the foundations were laid for an integrated, planned and targeted management of the levers for human resources development, focusing on the following objectives:

- define and expand the Group's strong identity, developing employer branding and effective human resources management processes to attract and retain the best talents;
- foster a shared Groupwide culture which attaches importance to corporate values and is based on internal rules and external regulations;
- enhance the human capital, strengthening employees' skills to improve the performance of both the individuals and the organisation;
- formalise the principles underlying growth processes and results delivery, by rewarding work performance according to the principles of merit and the achievement of results;
- promote growth and sustainability to increase and protect reputation, consensus and credibility as a prerequisite for creating and protecting value for stakeholders;
- promote inclusion and equal opportunities at all levels of the company population, identifying diversity as the ability to enhance skills and competitive edge at every level of the corporate structure;
- implement ways of working which facilitate work-life balance, as a tool to recognise, protect and respect the demands connected with the employees' various phases of life;
- optimise the alignment of human resources with corporate targets, also by means of HR analytics.

#### 3.1 Personnel management policies

Personnel management policies underpin organisational development and facilitate the adaptation and professional growth of people to effectively manage the Group's cultural, organisational and technological changes, thereby reducing uncertainty and resistance to change. The policies are essential to support and enhance people in any phase of their professional path and ensure a positive and productive work environment.

For this reason, we encourage:

- the engagement of employees in the decision-making process and in the design of processes, through active participation and ongoing feedback to build a sense of responsibility for the company;
- training and development, to provide resources with the tools required to meet the new challenges associated with change and acquire the skills needed to adapt to new practices and technologies;
- evaluation and monitoring of change impact to make ongoing improvements to the process;
- transparent and open communication helping people reduce uncertainty and resistance to change and increasing adaptability to evolving scenarios.

The Parent Company HR function defines the overall People strategy and oversees the areas of major evolution and development of the HR proposition, identifying critical success factors, key indicators,

internal and external interdependencies including through cross-cutting oversight of transformational projects, in order to identify the change initiatives required to support organisational evolution.

### **3.1.1 Strategic Planning**

The strategic planning process is based on the analysis of the demand for personnel, design of job positions, human resources allocation and competence management, with a view to defining the proper allocation of resources by combining organisational needs and people skills.

Planning is aimed at identifying and allocating the resources required to achieve strategic goals; it takes into account the organisation's current and future demand for skills, talents, and staffing required to support the business strategies identified.

Upskilling and reskilling paths may be required for the professional retraining of resources to meet specific needs.

### **3.1.2 Talent attraction**

In order to promote talent development and attraction, the BPER Group collaborates with top Italian institutes and universities, including through participation in events, recruiting and employer branding activities, creating synergies with the aim of offering students the opportunity to meet and get to know the Group.

### **3.1.3 Recruiting**

Budgeting and emerging needs contribute to determining the demand for personnel which the HR department searches for and onboards into the company through its dedicated functions. Recruitment and selection are constantly and regularly performed and are based on the definition of sourcing channels and talent attraction campaigns to have a solid pipeline of qualified candidates available.

Personnel are recruited through differentiated internal and external sourcing channels and, when necessary, with the support of specialised recruitment companies.

Internal and external job posting, should use neutral titles and terms, so that anyone who believes they qualify for a position and have a desire to apply can do so without perceiving any discrimination or preference. Gender balance must be maintained in the collection and screening of CVs, based on the actual availability of job profiles on the labour market.

In order to promote diversity, the BPER Group is committed to providing a diverse panel of recruiters and adopting stringent assessment criteria aimed at eliminating any possible discrimination related to gender or other individual characteristics, at all stages of the process. Furthermore, the HR function makes sure that the processes followed by recruitment companies also comply with the principles of non-discrimination and inclusion, including through appropriate formal and contractual commitments.

Selection is based on the assessment of the knowledge acquired through education and the professional and technical skills accumulated and highlighted in the curriculum vitae and/or professional path in the company. Personnel selection methodologies, depending on the job profile sought, may include individual and/or group interviews, aptitude tests, behavioural tests or assessments. The units of the Human Resources function in charge of the selection process may rely on the support of other organisational units (for which the job was posted) to contribute specific technical expertise. In some cases, for particularly relevant roles, top management functions may also participate in the process.

As part of the interviews, it is ensured that no questions will be asked that could be a source of discrimination.

Decisions in the area of selection and hiring focus on merit, competence and ability to perform one's role, without discriminating against the applicant based on gender identity, age, diversability, health status, ethnicity, geographic origin, sexual orientation and identity, or political ideologies.

In defining the economic treatment, the objectives of gender pay equality and consistency with applicable regulations and the BPER Group's remuneration policy are pursued.

After the applicant is selected and formally hired in accordance with the approval process and applicable regulations, the Human Resources function deals with their onboarding.

### **3.1.4 Onboarding**

The BPER Group is committed to facilitating the integration of new hires into the organisation through an onboarding process that allows them to become acquainted with the company's values, culture, policies and procedures as well as key people in the company in order to foster a sense of belonging and engagement from the very first days.

During onboarding, HR and management share company expectations, performance goals, and the responsibilities associated with the role with new hires, to help establish the foundation for good job performance and proper alignment with the goals of the company.

To facilitate adaptation and integration, new hires may be assigned a mentor or tutor.

To ensure that the workplace is fair, inclusive, and respectful of all minorities, it is critical that all new hires are treated fairly and made aware of the anti-discrimination policies and reporting channels available.

### **3.1.5 Training**

The BPER Group acknowledges the pivotal role of lifelong learning and continuing professional education, by designing and delivering pathways aimed at ensuring the professionalism and competence needed to fill the company's expected positions and facilitate organisational and technological change and evolution.

The organisational units in charge of training and development annually update an extensive catalogue of training proposals, to meet the demands of the business lines and, at the same time, comply with the regulatory requirements underlying the mandatory training to be provided to their workforce. Training proposals in the catalogue are delivered either in person, at the training centres, with the support of a team of external and/or internal trainers and lecturers, or through e-learning via a dedicated web platform.

The process is monitored in terms of both quality and attendance: staff are invited to fill out specific training satisfaction surveys, with results representing crucial feedback to be shared with trainers and the corporate bodies concerned in order to constantly improve the training proposition year after year.

To complement the path for the development of behavioural, technical and managerial skills, short- or long-term periods of professional training experience might be provided in other organisational units of the Bank or the Group.

The training proposition is also crucial in promoting cultural change towards inclusiveness and reducing gaps in this area. Therefore, the Group promotes company-wide training activities aimed at fostering learning equality and awareness campaigns on diversity issues and an inclusive culture, both in day-to-day management and leadership development.

Constant attention is paid to continuing professional education, management training, and involvement in high innovation-content projects.

Information collected is treated with respect and confidentiality to encourage greater openness and transparency in the exchange of communications in compliance with the principle of transparent and neutral decision-making after feedback is received.

### **3.1.6 Professional development**

The BPER Group pays specific attention to the growth of all its people through the development of shared strategies to guide the capabilities and aptitude of everyone towards corporate strategic objectives, by promoting cooperation, discussion and development of an inclusive leadership.

The policies for professional promotion and development are inspired by compliance with objective, neutral and inclusive criteria, which take into account the performance, the result, the professional profile, the organisational role and potential respecting the personal characteristics and aspirations of each and every resource.

In general, the following elements contribute to increasing the human resources' professional value:

- quality of the skills acquired, performance and results achieved over time;
- the aptitude and potential of each individual, as properly assessed;
- “on-the-job” leaning, professional and managerial training;
- mastery of the role;
- compliance with the rules of conduct defined by the Group in order to ensure that behaviours are in line with industry standards and practices;
- individual contribution to the improvement of corporate processes combined with the objective of always having a constructive and evolving vision of corporate practices;
- ability to manage a positive work-life balance.

Specific talent management programmes with tailor-made training courses are considered, which may also be provided in collaboration with leading third-party consultants in the sector.

Dedicated training programmes of excellence may be provided to the key staff of branch, semi-central and central structures. The objective of the BPER Group is to create a well-prepared and competitive work force, by focusing on strengthening the key skills of resources and increasing talents within the company.

Periodic assessments, tailored for current or future roles, may also be performed to provide additional information on the skills and potential of each person. The objective is to achieve a clear vision of the composition of the corporate bodies in order to organise *ad hoc* development programmes and dedicated areas of action for specific categories of workers.

### **3.1.6.1 Age Management**

The BPER Group is committed to enhancing the value of generational diversity with the aim of favouring an inclusive workplace, by promoting the enhancement of the skills of every generation in the company and improving the quality of work in a multi-generational context.

For this reason, the BPER Group adopts a strategic approach aimed at effectively managing different age groups within the company to maximise the contribution and well-being of all employees, notwithstanding their age, by acknowledging and facing the challenges and opportunities associated with a multi-generational work force. Professionalism, enhanced by expertise, is considered a driver for growth and enrichment, especially for resources who have most recently entered the job market. Younger generations bring new skills into the organisation which should be enhanced and shared with more senior resources.

Mentoring and reverse mentoring sessions between different generations may be performed and activities are planned to be launched to make the most of the know-how acquired.

### **3.1.7 Performance Management**

Performance management is a key process within the management of human resources; it allows for the assessment of individual performances, creating the best premises to reward distinguished performances and identify talent, fostering its development and retention, while also making each resource involved in the various phases of the process aware of their responsibilities.

The BPER Group is committed to specifically assessing all resources at each reporting level, following specific methodologies according to their professional profile and organisational role. The performance assessment model for executives is in line with the same principles.

The rest of the BPER Group staff are assigned tasks and objectives specifically designed around their position within the company and in line with the duties they are called to perform. The objectives must also encourage individual behaviour aimed at promoting a work environment in which diversity is enhanced and personal and professional growth is respected according to the principles of merit.

Feedback and periodic steps during the year allow for a systematic discussion between people and their direct supervisors, to foster communication and sharing.

Supervisor must ensure, for the resources within their remit, consistency of objectives assigned, skills and operating context teamwork and transparency with corporate objectives, by promoting continuous improvement.

### **3.1.8 Active listening**

The BPER Group promotes and encourages people listening initiatives to build a positive and inclusive culture based on trust and shared values, with a view to generating value and innovation while also attracting and retaining talents.

Listening to employees is based on standards that include the definition and management of models and tools for listening to the company's population with a structured approach, as well as the planning of interviews to feed the personnel management strategies with data and gather evidence to improve processes.

### **3.1.9 Career paths**

The career path is the synthesis of training and education backgrounds, development and assessment of corporate performance, and outlines the opportunities for growth of the employees within an organisation.

The paths help trace a progression of roles and responsibilities, guiding resources through several steps of professional growth. They can include vertical progression, with promotion to roles with more responsibilities, as a result of the experience gained, skills acquired, results achieved and potential demonstrated, or horizontal progression, aimed at broadening knowledge and skills in different - though not necessarily higher- roles, with various levels of complexity.

The BPER Group pursues a balanced management of diversity, by enhancing it as a distinctive element, needed to achieve increasingly more challenging objectives. Special focus is given to the pursuit of gender equality, in terms of both roles assigned and gender pay gap.

### **3.1.10 Succession Plans**

The BPER Group implements a strategy for succession plans that ensures a seamless and efficient transition of leadership and key roles within the company. The plans are essential to ensure operational continuity and governance stability.

They are based on the assessment of the professional and technical skills highlighted by the CV and professional path in the company, performance over time, possession and development of key leadership skills and the experience gained also in areas other than the banking sector.

The list of candidates for succession is defined in compliance with the principles and regulations in force, including those concerning gender equality, equity and inclusion.

The BPER Group invests in training and development of the individuals identified as potential successors with programmes often prepared jointly with Universities, Business Schools or training companies of excellence. In addition to classroom training, job rotation and tutoring programmes are activated, including in the form of skill coaching and mentoring.

### **3.1.11 Total Reward**

The Total Reward strategy provides a structured framework to recognise and give value to individual contributions and attract and retain talents. Total reward policies combine both remuneration and incentives with well-being and welfare, in the aim to create a satisfactory and motivating workplace that favours the growth and loyalty of people.

Total reward policies promote equity and transparency in the definition and award of incentives by adopting clear and consistent criteria applied homogeneously to all employees, thus reducing the risk of discrimination or preferential treatment. By comparing itself to the market benchmarks, the Group verifies and ensures pay equality in line with the role held, complexity managed and personal merit.

Policies also take into proper consideration the themes of sustainability, including gender neutrality. In particular, the gender neutrality of remuneration policies is periodically monitored by the Parent Company in compliance with the provisions of the regulations in force.

#### *3.1.11.1 Remuneration and incentive policies*

The Parent Company annually defines the "Report on Remuneration Policy and compensation paid" which includes guidelines and general provisions for the definition of its remuneration policies, to which reference should be made for further details.

Remuneration and incentive policies are aimed at giving value to merit and reward distinguished employee performance. These policies are defined in compliance with regulations in force and are part of the overall choices of the Group with regard to financial sustainability, risk taking, corporate values, long-term targets and strategies.

They are reflected in actions on fixed and variable remuneration, with the definition of short- and (if applicable) long-term incentive systems and individual, team or corporate performance bonuses and incentives.

#### *3.1.11.2 Salary review*

Salary increases and merit-based awards are assessed during a structured salary review process. The assignment of a higher level in the organisation or a salary increase is contingent upon organisational requirements of a position being part of a specific job cluster and individual requirements specifically relating to the employee's professional profile, potential for further development and performance assessment. Salary increases are granted on the basis of current remuneration as assessed against market remuneration benchmarks.

The standard process follows a dedicated and regulated procedure and begins with proposals being put forward within a specific timeframe and in compliance with minimum requirements. The proposals must be adequately justified and their analysis and approval process is structured into multiple assessment and decision-making levels.

For particularly significant business needs, actions may be defined even outside the standard process in compliance with the decision-making framework in force.

#### *3.1.11.3 Well-being*

In the context of corporate social responsibility, the BPER Group promotes a strategy aimed at enhancing the individual well-being of each person, which is implemented by providing welfare services and pursuing work-life balance and occupational health and safety objectives.

Under the legal, contractual and negotiation provisions, the BPER Group promotes solutions to facilitate balance and better management of the employees' personal lives with the Company's organisational needs, for instance through policies on parenting, forms of flexible remote work, part-time work or other solutions identified, inter alia, according to the regulatory framework.

Just as an example, in addition to monetary remuneration, the following may be provided:

- corporate benefits: health insurance, pension plans, meal vouchers, life and disability insurance, etc.;
- welfare plans: for instance, family services, corporate nursery, contributions for child education, mobility support, etc.;
- other well-being solutions: for example, health and well-being programmes, nutritional counselling, psychological support, mental health counselling, etc.;
- programmes for non-monetary rewards and awards.

The Group assesses and schedules specific actions for work-life balance, including through specific dialogue and listening sessions for the company's population.

### **3.1.12 Employee Relations**

The BPER Group is committed to ensuring that corporate practices and decisions involving the staff are in line with labour standards and other applicable regulations, with the aim of promoting a cooperative and productive work environment.

The Group attaches value to and stimulate correct and effective management of people relationships, to increase employee satisfaction, retention and the overall performance of the company.

The BPER Group recognises trade unions as expressing and representing the needs of workers and aims at maintaining and consolidating a cooperative, participated relationship with union representatives, as part of a system in which the processes for change are becoming increasingly faster and more pervasive, with the consequent need for systematic, complex discussion. The Group is committed to diversity and, in this sense, it undertakes to promote initiatives for the inclusion and consideration of any new needs that may emerge.

### 3.1.13 Offboarding

The Human Resource Department is in charge of guiding the employees even in the delicate phase of offboarding the organisation, which should be carried out professionally and respectfully of the identity and the professionalism of the outgoing employee.

The organisation considers every employee termination as a possibility to assess the outgoing skills and share them by handing them over to be retained in the company, while also assessing the hiring and succession needs by identifying the best strategy between internal and market research. The departing person is offered the opportunity to participate in an offboarding interview to provide feedback and share the experience gained during employment.

The offboarding policy ensures compliance with the law and with the corporate remuneration policies in force.

### 3.1.14 Staff participation in external events

In choosing speakers and trainers identified to take part in external, cultural, commercial, institutional initiatives, in line with their role in the Group and with the necessary skills in relation to a specific topic, the Group expects its staff to be represented ensuring, by way of a non-limiting example, diversity in gender, age, language and ethnic, geographic or national origin.

## 3.2 HR administrative processes

HR administrative processes are essential to ensure efficiency and compliance in Staff operations. They cover the entire life cycle of the employee, from onboarding to termination of the employment relationship.

For example, they include management of hirings, employee attendance detection, management of holidays and other leaves, preparation of payslips, management of health insurance, registration of the “work from home” contract, support for the welfare portal, processing of employee expense reports, management of scholarships, fulfilment of obligations with Authorities, support on all HR topics and much more, with the aim of ensuring regulatory compliance, operating efficiency and a positive experience for the staff.

Activities must be accurately documented and regulated to comply with regulations in force and to support the transparent and responsible management of human resources.

It is essential that all procedures are standardised and regularly updated, ensuring that the employees' personal data are processed securely and confidentially.

## 3.3 Roles and responsibilities

### - of the Parent Company:

Corporate Body / O.U.	Macro-process name	Description of Roles and Responsibilities
Board of Directors		Examines and approves the Human Resources Policy
Committees		Support the Board of Directors, where needed and according to the provisions established by the Board of Directors in the Regulations governing the operations of the Committees
Chief Executive Officer		Resolves upon topics concerning Human Resources, according to the provisions of BPER Banca S.p.A.'s framework of delegated powers in force.
Chief Human Resources Officer	Human Resources	Defines the Human Capital Strategy and governs the Total Reward strategy (remuneration and welfare policies ) and staff costs at the Group level Resolves upon career advancements

		<p>Resolves upon the assignment/removal of areas of responsibility, including assessing and proposing candidates for top management positions and Corporate Control Functions</p> <p>Oversees the assessment of the performance of Top Management roles</p> <p>Defines the annual staffing plan</p> <p>Governs trade union relations and the interaction with trade associations in the HR area</p> <p>Ensures the application of labour regulations and oversees litigation with personnel</p> <p>In coordination with and under the supervision of the Chief Executive Officer and/or of the General Manager of BPER Banca (according to the provisions of the delegated power framework in force at any given time), the Chief Human Resources Officer is responsible for the implementation of policies and guidelines on diversity, equality and inclusion, with particular regard to the Company's population, and defines management models useful to implement the initiatives and objectives identified by the Board of Directors, by structuring the periodic performance monitoring process</p>
Human Capital Strategy Unit/	Human Resources	<p>Activates the Human Capital Strategy, by identifying critical success factors and key indicators</p> <p>Coordinates the main cross-cutting HR projects to steer the strategic objectives planned</p> <p>Oversees the Total Reward Strategy</p> <p>Coordinates and assesses initiatives aimed at improving the work experience of employees</p> <p>Ensures the development of HR Systems in line with the Company's HR Strategies</p>
HR Management Department/	Human Resources	<p>Manages key resources</p> <p>Defines the proper allocation of resources as a way to foster their growth and obtain the ideal organisational structure</p> <p>Assesses and identifies resources to implement succession plans</p> <p>Oversees proper management of the staffing plan by balancing redundancies with the demand for staff, including Talents and High Potential staff</p>
HR Management Unit Central Structures	Human Resources	Coordinates management of the resources assigned to the Parent Company's and Group Companies' central structures that have outsourced this service to the unit
HR Management Unit - Northern territorial department; HR Management Unit - Centre-South Territorial Department	Human Resources	<p>Coordinates management of resources assigned to the relevant Parent Company's Regional Department structures</p> <p>Ensures alignment of HR strategies with business objectives through the HR Business Partner model (achieving business objectives through people)</p> <p>Manages relationships with the Management of the structures in scope by assessing their qualitative and quantitative demand</p>

		Oversees the execution of performance assessment processes and reward and incentive treatment for the relevant structures by ensuring quality and balance checking how the outcomes are reflected at managerial level
Talent Management Unit	Human Resources	<p>Defines the employer branding strategy aimed at corporate attractiveness and directs the recruiting and selection processes</p> <p>Defines the learning strategy, based on business requirements and training needs</p> <p>Sets development guidelines designed to support business goals and strategies</p> <p>Ensures projects in the area of identification and development of Talents and High Potential staff</p>
Union Relations & HR Services Department	Human Resources	<p>Coordinates relations with the Italian Banking Association (ABI) and the national secretariats of the Trade Union Organisations</p> <p>Oversees the welfare, social security, pension and work-life balance issues</p> <p>Provides advisory on disciplinary actions and employee litigation management</p> <p>Oversees compliance of HR management with the law</p> <p>Takes on the role of Specialist Monitoring Unit to manage the risk of non-compliance with the relevant regulations</p> <p>Monitors disciplinary actions and employee litigation management</p>
HR Services Unit		<p>Coordinates the activities required for the fulfilment of administrative obligations for the Group's personnel and defines the rules for the allocation and management of any request for support</p> <p>Defines agreements on insurance, social security, pension and other employee benefits, by also guaranteeing advisory and administrative assistance</p> <p>Ensures the performance of the administrative activities necessary for the completion of management, trade union and contractual processes</p>

**- of the other Group companies**

<b>Corporate Body / O.U.</b>	<b>Macro-process name</b>	<b>Description of Roles and Responsibilities</b>
Board of Directors		Endorses the Human Resources policy defined by the Parent Company
Human Resources Function		If available, it is in charge of the implementation of the Group policies and guidelines on Human Resources provided by the Parent Company

## 4 Annexes

### 4.1 Version History

First release

## 4.2 Regulatory framework

### External regulations:

- Supervisory Provisions for Banks - Bank of Italy Circular 285/2013 as later updated, in particular Part I, Title IV, Chapter 3, Section I, Paragraph 6
- ESMA – Guidelines on certain aspects of the MiFID compliance function requirements – 25/06/2012 ESMA/2012/388
- EBA - Guidelines on the assessment of the suitability of members of the management body and key Function holders of 22 November 2012 - EBA/GL/2012/06
- Charter of Fundamental Rights of the European Union (Art. 21)
- Italian Law no.67/2006 (Non-discrimination Law)
- Italian Law no. 68/1999 (Rules on the Right to Work of Persons with Disabilities)
- Italian Legislative Decree no. 151 of 26 March 2001 Consolidated legislative provisions on the protection and support of maternity and paternity, in accordance with Article 15 of Law no. 53 of 8 March 2000
- Italian Legislative Decree no. 198 of 11 April 2006 -National Code of Equal Opportunities between Women and Men, pursuant to Art. 6 of Italian Law no. 246 of 28 November 2005
- Italian legislative Decree no. 80 of 15 June 2015 - Measures to reconcile the needs of care, life and work
- Law no. 162 of 5 November 2021 - Amendments to the code referred to in Legislative Decree no. 198 of 11 April 2006 and other provisions on equality of treatment between men and women in the workplace
- Law no.85 of 3 July 2023, converting with amendments Law Decree no. 48 of 4 May 2023 - Urgent measures for social inclusion and access to employment, implementing urgent measures for social inclusion and access to employment
- Directive (EU) 2024/1500 of the European Parliament and of the Council of 14 May 2024 on standards for equality bodies in the field of equal treatment and equal opportunities between women and men in matters of employment and occupation, and amending Directives 2006/54/EC and 2010/41/EU
- Legislative Decree no. 62 of 3 May 2024 defining the condition of disability, basic assessment, reasonable accommodation, multidimensional assessment for the development and implementation of the shared and individual life project.

### Internal regulations:

- Organisation and Management Model - General section pursuant to Legislative Decree 231/01
- Delegated powers of the Governing Bodies and Top Management Executives of BPER Banca S.p.A
- Code of Ethics
- Corporate Governance Code of the BPER Group
- Governance Policy of the BPER Group
- Policy on diversity, equity and inclusion in the Corporate Bodies and in the company population of the BPER Banca Group
- ESG (Environmental, Social and Governance) Policy
- Anti-corruption Policy
- Policy on the of non-compliance risk in the management of conflicts of interest

- Group Policy for the governance of reputational risk
- Report on Remuneration Policy and compensation paid
- Personal Data Protection Policy
- Group Policy on the Internal control system
- Regulation governing the Ethics and Governance Process of Artificial Intelligence Systems

**Repealed regulations:**

Group Guidelines for the management of Human Resources