



Diversity, Equity and Inclusion Policy

Modena, 12 June 2025

Version 3.0

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1 GENERAL ASPECTS

Summary of main topics/amendments made

The “Diversity, Equity and Inclusion Policy” (hereinafter also the “Policy”) describes the policies, guidelines and principles adopted by BPER Banca, as the Parent Company, with regard to:

- (i) the composition of the Corporate Bodies of BPER Banca and its Subsidiaries and
- (ii) the entire population of the BPER Group.

The BPER Group recognises the values of diversity, equity and inclusion as key resources for innovation and the growth in productivity and sustainability of the organisation.

Therefore, the Group operates to favour a widespread dissemination of the culture necessary to ensure an inclusive environment within its organisation, that does not discriminate by gender, age, disability, health condition, ethnicity, geographical origin, sexual orientation and identity, religion or political ideology, and promotes these aspects to protect the utmost expression of each person’s potential as a distinctive, functional element for the growth of the Group.

Within this context and taking into account the social, economic and cultural characteristics of the market in which it operates, the Group pays specific attention to the aspects associated with gender diversity and the recognition of rights to the people of the BPER Group who affirm their gender identity through a process of Social Gender Affirmation. The Group is committed to ensuring equal opportunities and treatment, by using neutral, objective and inclusive criteria on every level of the company.

Having regard to the regulatory and legislative framework, the recommendations of the Corporate Governance Code, the Articles of Association, and the Code of Ethics of BPER, this Policy defines the Principles and commitments that the Group intends to undertake to promote inclusion and equal opportunities within its own organisation, which includes the Corporate Bodies, Subsidiaries, and all of the Company’s personnel.

With reference to developments in the regulatory framework and the Reference Practice for gender equality of the Italian national standardisation body (UNI PdR 125:2022), the following changes have been made to the previous version:

Corporate Bodies

- 1) requirement that the Board of Directors and its Committees should take into account the guidelines contained in this Policy, even when it becomes necessary to: (i) coopt a new member of the Board of Directors; (ii) approve the “Guidelines for Shareholders” on the qualitative and quantitative composition of the Board of Directors, in view of its renewal; (iii) designate the candidates for the office of Directors and Statutory Auditors of Subsidiaries; (iv) implement Succession Plans for the Top Management of BPER Banca S.p.A.;
- 2) requirement that the Board of Statutory Auditors should take into account the recommendations contained in this Policy, if the Board is called to approve the “Guidelines for Shareholders” on the qualitative and quantitative composition of the Board of Statutory Auditors, in view of its renewal;
- 3) incorporation of paragraphs 4.1, 4.3 and 4.4 in the section concerning the designation of members of the Subsidiaries’ Corporate Bodies, including for the purpose of taking into account the content of the General guidelines for the composition, designation and remuneration of the members of the Corporate Bodies of the Subsidiaries of BPER Banca S.p.A. and of regulations in force.

Company Population

- 1) Update of the safeguards to enhance the value of diversity:
 - inclusion of the role of the Steering Committee for gender equality in the approval and monitoring process of the “Strategic Plan for gender equality” (see point 2);
 - Addition of the Disability Manager.
- 2) Alignment of targets, actions, responsibilities and monitoring of the “Three-Year Operational Plan to enhance the value of gender diversity” with the requirements of the UNI/pdr 125:2022 Reference Practice, consequent renaming of the Plan as “Strategic Plan for gender equality” and redefinition of the approval process.
- 3) Strengthening of the Diversity, Equity and Inclusion Principles for: people who undergo a social gender-affirmation process, inclusion of people with disabilities, prevention of harassment in the workplace and responsible communication.

Preparer:

Chief General Counsel - Corporate & Regulatory Affairs Unit

(for the section concerning the Corporate Bodies)

Chief People Officer - People project and planning Office

(for the section concerning the Company Population)

Approver:

Board of Directors

Recipients of the document:

Banks		Companies				
Italian		Ancillary undertakings		Financial corporations		Other subsidiaries*
X	Bper	X	MO Terminal	-	Credit	X Adras
X	Bibanca	X	Bper Real Estate	X	Bper Factor	X Arca Holding
X	Banco di Sardegna	X	Bper Trust Company	X	Sardaleasing	X Commerciale Piccapietra
X	Banca Cesare Ponti			X	Finitalia	X St. Anna Golf
Abroad				-	Non-Credit	X St. Anna Gestione Golf
X	Bper Bank Luxembourg			X	Estense C. Bond	X Annia
				X	Estense C.B.CPT	
				X	Arca Fondi SGR	
				X	Carige C. Bond	
				X	Lanterna Finance	
				X	Lanterna Mortgage	

2 DEFINITIONS

Articles of Association: the Articles of Association of BPER Banca.

Board of Directors: the Board of Directors of BPER Banca.

Board of Statutory Auditors: the Board of Statutory Auditors of BPER Banca.

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

Code of Ethics: BPER's Code of Ethics, available in the "Governance" Section of the corporate website (<https://group.bper.it/en/governance/documents>).

Committees: the committees established within the Board of Directors of BPER Banca.

COO Function: for the purposes of this document, it refers to the Chief Operating Officer and the organisational units reporting thereto in Bper Banca, as well as the corresponding organisational units in other Group companies, if any.

Corporate Bodies: the Bodies with strategic supervision, management and control functions.

Corporate Governance Code: the Corporate Governance Code of listed companies approved, at any given time, by the Corporate Governance Committee.

Disability Manager: for the purposes of this document, it refers to the Parent Company's manager who is in charge of coordinating disability-related initiatives.

Discrimination: lack of equal opportunities and treatment based on prejudice or classification.

Gender Equality Management System: system to manage gender equality in compliance with the UNI/PdR 125:2022 Reference Practice, adopted, *inter alia*, for the purposes of obtaining Gender Equality Certification.

Gender identity: a person's innermost sense of self as male, female or non-binary. Therefore, it has nothing to do with biological identity nor with sexual orientation.

Gender pay gap: the difference in average annual remuneration between men and women.

Harassment: unwanted behaviour that has the purpose or effect of creating an offensive, humiliating or degrading work environment.

Human Resources Function: for the purposes of this document, it refers to the Chief People Officer and the organisational units reporting thereto in Bper Banca, as well as the corresponding organisational units in other Group companies, if any.

Key Performance Indicators (KPIs): key performance indicators used to monitor the targets identified and described in the Strategic Plan for gender equality.

Preferred name or Alias: for the purposes of this Policy, it refers to the preferred name chosen by the applicant in an active exercise of their gender self-determination.

Principles: the principles listed under Paragraph 3 below

Reference Practice Uni Pdr 125:2022: guidelines for a gender equality management system that provide for the adoption of specific KPIs (Key Performance Indicators) relating to Gender Equality Policies in organisations.

Social Gender-Affirmation process: process through which a transgender person affirms their gender at a personal and social level, based on their gender identity. The Italian Legal System allows to request, with a specific legal procedure, the change of personal data to align them with the person's gender identity.

Steering Committee: for the purposes of this document, it refers to the ESG Management Committee in its functions as Steering Committee for gender equality, according to the guidelines of the Uni Pdr 125:2022 Reference Practice.

Strategic Plan for gender equality: formal document prepared pursuant to the Uni 125:2022 Reference Practice that defines the objectives to be pursued, along with resources, methods and frequency of monitoring.

Subsidiaries: Italian or foreign companies belonging to the BPER Banca S.p.A. Group, as well as other Italian or foreign companies directly or indirectly controlled by BPER Banca, pursuant to art. 2359 of the Italian Civil Code, art. 23 of the Consolidated Law on Banking and art. 93 of the Consolidated Law on Finance.

3 CONTENT OF REGULATORY SOURCES

3.1 Diversity, equity and inclusion principles

In line with regulatory provisions and recommendations in force, best practices and the representations made in its Code of Ethics, the BPER Group operates according to the following Key Principles:

- **promoting an inclusive culture for all stakeholders of the Group**, with diversity being identified as the ability to strengthen skills and the competitive edge at every level of the corporate structure;
- **guaranteeing equal opportunities and treatment in every phase of life in the company** (onboarding, training, assessment, professional development and remuneration, offboarding);
- **guaranteeing balance in (internal and external) selection processes and promotion based on merit**, with no discrimination or distinction;
- **structuring training courses** aimed at supporting professional growth and an increase in skills, covering aspects of diversity also with a view to contributing to cultural change;
- **assessing** every collaborator and promoting their professional development following approaches based upon objective, neutral and inclusive criteria;

- **guaranteeing remuneration and incentives based on equity**, excluding any penalisation related to diversity factors;
- implementing work methods that facilitate **work-life balance**, as a way to recognise, protect and respect the requirements associated with the different stages of life of its employees;
- promoting the **inclusion of people with disabilities**, ensuring the full enhancement of their value with no discrimination and making sure they are supported with adequate instruments and equipment to carry out their work;
- **preventing harassment in the workplace**, through training and increased awareness of the topic and through transparent reporting processes;
- **supporting the process of Social Gender-Affirmation of transgender people** in the BPER Group
- **communicating** responsibly by implementing an internal and external communication plan on the topics of diversity, equity and inclusion.

3.2 Corporate Bodies of BPER Banca and its Subsidiaries

The composition of the Corporate Bodies of the Parent Company is inspired by the Principles described above and ensures compliance with the provisions of regulations in force and best practices, as it incorporates profiles that are different in skills, educational background and professional career, geographical origin, gender, age and seniority in the role.

Taking into account the current regulatory framework and articles of association, the recommendations regarding BPER Banca's Corporate Bodies contained in this Policy, are addressed to the subjects involved in the process for the selection and appointment of the Corporate Bodies and, in particular:

- the Shareholders, who, pursuant to the law and the Articles of Association, intend to submit lists of candidates for the Board of Directors and for the Board of Statutory Auditors or candidates to replace Directors or Auditors stepping down during their tenure;
- the Shareholders' Meeting, called to appoint or replace any member of the Corporate Bodies in office;
- the Board of Directors, and its Committees, if it becomes necessary to:
 - (i) coopt a new member of the Board of Directors;
 - (ii) approve the "Guidelines for Shareholders" on the qualitative and quantitative composition of the Board of Directors, in view of its renewal;
 - (iii) designate the candidates for the roles of Directors or Statutory Auditors in the Subsidiaries;
 - (iv) implement the Succession Plans for the Top Management of BPER Banca S.p.A.

The recommendations included in this Policy can also be taken into consideration by the Board of Statutory Auditors, when it is called to approve the Guidelines for Shareholders on the qualitative and quantitative composition of the Board of Statutory Auditors, in view of its renewal.

Moreover, BPER Banca, in its capacity as the Parent Company, adopts - with a document approved by the Board of Directors - the "**General Guidelines**" regulating the composition and designation of the Corporate Bodies of the Subsidiaries, referencing values in line with the principles of this Policy and promoting diversity and the inclusion culture even within the Corporate Bodies of the Subsidiaries.

3.2.1 Gender

As part of its Articles of Association and/or at regulatory level, the BPER Group implements mechanisms to make sure that the number of representatives of the less represented gender in the Board of Directors and the Board of Statutory Auditors is at least equal to the number required by the legislation in force. In this regard, it should be noted that, in line with the Supervisory Provisions, it is good practice to make sure, if possible, that:

- the roles of Chair of the Board of Directors, Chair of the Board of Statutory Auditors, Chief Executive Officer and General Manager (if any) of BPER Banca are not covered by persons of the same gender;
- in the Committees, at least one member belongs to the less represented gender.

With regard to the Corporate Bodies of the Subsidiaries, the General Guidelines identify the criteria to ensure proper gender diversification also in the unsupervised Subsidiaries, without prejudice to nominations being made by taking into account the professionalism and skills of the candidates in relation to the characteristics and business of each Subsidiary involved at any given time.

3.2.2 Age and seniority in the role

BPER Banca considers that diversification in the age of its members guarantees different experiences and perspectives, which are useful to encourage profitable discussions within the Corporate Bodies. It is therefore desirable for the Board of Directors and the Board of Statutory Auditors to contain, as far as possible, a balanced combination of representatives belonging to different age brackets and seniority in the role.

3.2.3 Diversity in skills, educational background and professional profile

In compliance with the specific criteria of fitness and propriety required by the regulations in force, BPER Banca emphasises the importance of ensuring that the members of its Corporate Bodies have adequate expertise, favouring the presence of persons with a managerial and/or professional profile of proven stature, so as to build a set of different and complementary skills and experiences, allowing the Body to fulfil its duties efficiently and effectively. To that end, consideration is given to both theoretical knowledge, acquired through studies and training, and practical experience, achieved in carrying out work activities.

In assessing the complementary nature of the profiles and key characteristics of the members of the Corporate Bodies, it is important to also take account of the Guidelines on the qualitative and quantitative composition of the Board of Directors and Board of Statutory Auditors produced by the outgoing Bodies in view of their renewal, which also incorporate the results of the self-assessment processes carried out by the Bodies themselves.

Subject to the foregoing, according to the provisions of the industry regulations and best practices, BPER promotes induction and training initiatives for the members of its Corporate Bodies, in order to guarantee that the set of technical expertise and skills of the representatives, necessary to carry out their role in full awareness, is always adequate and is preserved over time.

With regard to the Corporate Bodies of the Subsidiaries, the General Guidelines require that, when no specific internal or external rule is applicable, candidates should be identified from among subjects that have an adequate level of competence, experience and skills in relation to the tasks associated with the role held

and the size and operations of the Subsidiary involved.

Pursuant to these General Guidelines, the set of professional skills and competencies of the candidates, considered as a whole, should be such as to allow the Corporate Bodies to efficiently and effectively carry out their tasks, taking into consideration the scale and type of business of the Subsidiary concerned, as well as - for supervised Banks and Subsidiaries - the restraints that derive from regulatory provisions applicable to the composition of the Corporate Bodies.

3.2.4 Independence

Starting from the assumption that all Directors must be capable of acting with full independence of mind and awareness of the rights and duties inherent to their role, a significant part of the non-executive Directors of BPER Banca S.p.A., at least equal to the number set by the legislation in force and the Articles of Association, must meet the independence requirements defined in the Articles of Association and compliant with external and internal applicable regulations, in the interest of the sound and prudent management of the Bank and in compliance with the law and any other applicable regulation.

BPER wishes that the best market practices and the recommendations of the Corporate Governance Code are implemented, to also allow for an adequate composition of the Committees.

With regard to the Corporate Bodies of the Subsidiaries, when candidates are identified, the Parent Company makes sure that members meet the independence requirements, if required by the regulations in force.

3.3 Company Population

To promote inclusion and equal opportunities at all levels of the company population and improve the work environment, the main areas of intervention that the Group intends to control have been identified.

3.3.1 Safeguards to enhance the value of diversity

The BPER Group is committed to implementing processes to improve the work environment and enhance the value of diversity, including with the adoption of dedicated organisational units. Specific safeguards to enhance the value of gender equality have also been adopted in line with the UNI PDR 125:2022 Reference Practice.

In particular, with regard to disability, the Disability Manager is appointed in the Parent Company by the Chief People Officer, or by the person identified, at any given time, under the "Powers delegated to the Bodies and Senior Managers of BPER Banca S.p.A.".

3.3.2 Recruitment and selection (internal and external)

The BPER Group is committed to preventing inequality in the process of selecting and hiring employees.

In order to promote diversity, the BPER Group undertakes to establish a diversified panel of recruiters and to adopt objective assessment criteria aimed at reducing any possible discrimination related to gender, in all stages of the process.

Decisions on selection and recruitment will be based on merit, skills and capacity to carry out the role, with

no discrimination based on gender identity, age, disability, state of health, ethnicity, geographical origin, sexual orientation and identity or political ideology.

The Group implements inclusive, non-discriminatory policies towards people that, during the hiring and selection phase, have started or completed a process of Gender Affirmation or plan to start one in the future.

The BPER Group is committed to sharing the Principles included in this Policy with suppliers and head hunters.

3.3.3 Training initiatives

The training offer is one of the main drivers of personal and professional growth of the whole company population and it constitutes a key element for promoting cultural change in the perspective of diversity, equity and inclusion, reducing the gaps that currently exist in that area.

Therefore, the Group promotes a series of training activities aimed at favouring equality of learning and awareness-raising campaigns on aspects of diversity and on the culture of inclusion.

3.3.4 Professional development paths and career management

To promote the professional development of individuals, the Group is committed to adopting objective, neutral and inclusive criteria that take account of performance, professional profile, organisational role and potential, respecting personal characteristics.

More specifically, the Group undertakes to strengthen and support gender equality in appointment processes and, more particularly, those regarding key managerial roles.

The BPER Group recognises the importance of ensuring full career accessibility for people with disabilities and adopting measures to promote an inclusive work environment. This can include the implementation of tailor-made professional development programmes, the adjustment of work stations and raising personnel awareness on topics concerning disability.

3.3.5 Remuneration policies and pay equity

The BPER Group adopts remuneration and incentive policies and remuneration schemes based on equity, understood as remuneration consistency between comparable roles and responsibilities, and on the recognition of merit.

The aforementioned Principles are also applied by using performance assessment criteria based on the recognition of skills, experience, performance and professional qualities without any kind of discrimination.

In order to facilitate the application of gender-neutral policies, assess their effectiveness and monitor their application in a timely manner, the Group has established a granular pay data analysis model that incorporates the provisions of European and national supervisory regulations, taking into due consideration the regulatory developments of the Pay Transparency Directive, as well as alignment with the industry's best practices.

In particular, the Group periodically monitors the gender pay gap and verifies, as part of the annual review,

the application of the gender neutrality principle established in the Remuneration Policy with regard to different areas of activity and its development overtime.

3.3.6 Welfare and Work-Life Balance Policies

The Group is committed to pursuing work-life balance policies via specific welfare initiatives, aimed at all the company population, making sure that the different needs of different generations in the company are represented. This includes flexible working hours, family care tools and tailor-made solutions to improve the ability to balance personal and professional workloads. Specific attention is given to ensuring that employees with part-time schedules or flexible working hours can participate in work meetings. The Group examines, analyses, assesses and plans actions targeted at achieving this balance also through specific periods of discussion with workers' representatives at company or at Group level, potentially also in specific committees.

The Group is committed to promoting programmes for maternity and paternity leaves in each of their phases, which may include activities before, during or after the leave.

3.3.7 Support for people of the BPER Group in a Social Gender Affirmation process

All transgender people in the BPER Group may request that the organisation supports and accompanies them in their process of Social Gender-Affirmation, formalising their request using the operating and regulatory procedures in force at any given time.

Social Gender Affirmation is the process through which a person presents themselves to the community with a name, a pronoun (he/she/they), clothing and, in general, behaves consistently with their self-perceived gender, which does not correspond to the gender they were assigned to at birth. Social Gender Affirmation can be started even before authorisation for changes to a person's personal data is given by the relevant Court.

The change of personal data on documents and gender reassignment are carried out after authorisation is obtained from the Relevant Court, to which the person submits the request. A person can show their actual gender identity despite still having the name they were assigned at birth as a way to show they are fully expressing their gender identity in their social and work lives.

The person embarking on a process of Social Gender-Affirmation can also choose to delay or not submit a formal request for gender reassignment to the Court. Whether the person has applied to the Relevant Court to have their personal data changed on their documents or has decided to initiate their Gender Affirmation without applying to the Court, the BPER Group activates the support provided for by this Policy, in full respect of the needs of the person.

The BPER Group is committed to adopting specific measures to support transgender people, including the use of their preferred name on the company badge, access to the workplace with clothing that affirms their gender-identity and use of toilets and changing rooms of their self-perceived gender. The Group also offers specific guarantees for gender dysphoria (e.g.: psychiatric, psychotherapeutic, pharmacological support and surgery expenses) included in the health insurance according to the coverage applicable at any given time, leaves for medical treatment and the possibility to request managerial intervention to reduce psychological discomfort (e.g.: temporary assignment to a new role, redeployment to a different organisational unit).

Moreover, an alias email address may be assigned. For communications and documents, to be sent or received, that are of a contractual or enforcing nature or that in any case involve commitments, the person must continue to use their email address with the name still registered with the Civil Registry, until the registered name is changed, as the case may be.

3.3.8 Prevention of harassment in the workplace

The BPER Group considers the protection of personal safety, freedom and individual personality a core value, and reasserts its firm conviction that any act of harassment and violence is a threat to a person's dignity potentially compromising the health, confidence, morale, motivation, work performance, organisation and reputation of the Group.

The BPER Group is committed to analysing risk, preventing and managing harassment in the workplace and to providing communications and training on the topic, in addition to adopting a reporting procedure (e.g.: the whistleblowing channel) and support measures.

3.3.9 Responsible communication

Responsible communication is an essential pillar to promote an inclusive company culture respectful of diversity. It requires the use of clear, non-discriminatory language, respectful of diversity, that values individual differences and promotes an equal and welcoming work environment.

Each employee is encouraged to pay attention to their words, avoiding stereotypes, prejudices or expressions that may offend or exclude a person based on gender, ethnicity, religion, sexual orientation, disability or other personal characteristics.

3.4 Strategic Plan for Gender Equality

Having regard to the Principles, the areas of intervention described above and the guidelines of the UNI/PdR 125:2022 reference practice, the BPER Group defines a "Strategic Plan for Gender Equality".

The Strategic Plan includes:

- the definition of quantifiable, measurable and objective targets and key performance indicators (KPIs);
- the definition of the actions and interventions needed to achieve the targets;
- the regular measurement of results achieved both in qualitative and quantitative terms and reporting thereof;
- the preparation of potential corrective actions.

The time horizon of the Strategic Plan for Gender Equality is usually three years, but it can change based on the business needs aimed at achieving the objectives set, including for certification purposes.

The BPER Group also reports on the activities carried out and the objectives achieved.

4 ROLES AND RESPONSIBILITIES

4.1 of the Parent Company

Corporate Body / O.U.	Process Name	Description of Roles and Responsibilities
Board of Directors		<p>The Board of Directors is the promoter and guarantor of the dissemination of the culture of diversity, equity and inclusion across the BPER Group, both within the Corporate Bodies and the company's entire population.</p> <p>In particular, to this end, with the support of the relevant Committees, the Board of Directors:</p> <ul style="list-style-type: none"> – approves the Group Policy on diversity, equity and inclusion (this Policy) and any updates thereto; – designates candidates for appointment to the Corporate Bodies of the Subsidiaries, in accordance with the Policy and with applicable internal and external regulations; – in the event of co-opting one or more members, it proceeds with their appointment in accordance with the Policy; – assesses the gender neutrality of the remuneration policies adopted and assesses the Gender Pay Gap and Career Gap and their evolution over time.
Board-internal committees		<p>Board-internal committees support the Board of Directors in activities relating to issues of diversity, equity and inclusion within the Corporate Bodies and across the company's entire population, as established by the Board of Directors itself in the Operating Rules of the Committees.</p>
Chief Executive Officer		<p>The CEO:</p> <ul style="list-style-type: none"> – approves the Strategic Plan for gender equality, prepared pursuant to the UNI/ PdR 125:2022 reference practice – periodically informs the Board of Directors and the relevant Board Committees on the content of the Plan and its progress

Steering Committee		<p>The Steering Committee:</p> <ul style="list-style-type: none"> - examines the draft Plan prior to the approval by the CEO. - evaluates and periodically monitors the progress of the KPIs set out in the Strategic Plan for gender equality. - defines, assesses and monitors the effectiveness of the Diversity, Equity and Inclusion Policy and the Strategic Plan for gender equality, as required by the UNI/PdR 125:2022 reference practice and its relevant Management System.
Chief People Officer (CPO)		<p>In coordination with and under the supervision of BPER Banca's Chief Executive Officer and/or General Manager (if appointed), the CPO:</p> <p>is responsible for implementing the policies and guidelines on diversity, equality and inclusion, with particular regard to the Company's population;</p> <p>defines management models useful for implementing the initiatives and objectives identified in the Strategic Plan for gender equality, structuring the periodic performance monitoring process</p> <p>prepares - through the structures it oversees and working with the company departments involved at any given time - the Strategic Plan for gender equality, which is then submitted to the CEO for approval, subject to prior review by the Steering Committee</p> <p>appoints the Disability Manager</p>
CPO Function		<p>The CPO Function manages aspects related to the needs of people who have communicated their Social Gender-Affirmation Pathway</p>
COO Function		<p>The COO Function fulfils the operational obligations related to the Gender Affirmation Pathway (e.g., managing the email alias, badge assignment)</p>
Disability Manager		<p>The Disability Manager:</p> <p>supports the CPO in the development of policies and programmes for the inclusion of people with disabilities.</p> <p>supports the CPO in relations with the external stakeholders and/or relevant trade associations on disability issues.</p> <p>coordinates the initiatives on relevant issues in collaboration with different areas of the Company to make sure that the needs of employees with disabilities are met.</p>

4.2 of the other Group companies

Corporate Body / O.U.	Process Name	Description of Roles and Responsibilities
Board of Directors		The BoD adopts the policy defined by the Parent Company on diversity, equity and inclusion, for the parts applicable to its Subsidiaries, and makes sure it is applied consistently, by promoting and ensuring the dissemination of a culture of diversity, equity and inclusion within each Subsidiary concerned, in compliance with applicable external and internal regulations.
Human Resources Function		In coordination with and under the supervision of the Subsidiary's delegated body (Chief Executive Officer, General Manager, etc.), the Human Resource Function is responsible for the implementation of the Group's policies and guidelines on diversity, equality and inclusion

5 Annexes

5.1 Version history

The version history is provided below:

Version	Date of approval	Directive No.	Summary of amendments
1.0	16/03/2021	10/2021	Release
2.0	28/04/2022	32/2022	Update of the Policy with its scope of application being extended to the Corporate Bodies of BPER Banca and its Subsidiaries

5.2 Regulatory framework

External regulations

- Directive 2013/36/EU of the European Parliament and of the Council of 26 June 2013 on access to the activity of credit institutions and the prudential supervision of credit institutions and investment firms
- Directive 2014/95/EU of the European Parliament and of the Council of 22 October 2014, amending Directive 2013/34/EU as regards disclosure of non-financial and diversity information by certain large undertakings and groups

- Directive 2016/2102/EU of the European Parliament and of the Council of 26 October 2016 on the accessibility of websites
- Directive 2019/882/EU of the European Parliament and of the Council of 17 April 2019 on the accessibility requirements for products and services
- Regulation (EU) No 575/2013 of the European Parliament and of the Council of 26 June 2013 on prudential requirements for credit institutions and investment firms and amending Regulation (EU) no. 648/2012
- Joint ESMA and EBA Guidelines on the assessment of the suitability of members of the management body and key function holders
- Italian Legislative Decree no. 385 of 1 September 1993 (Consolidated Law on Banking)
- Italian Legislative Decree no. 58 of 24 February 1998 (Consolidated Law on Finance)
- Bank of Italy Circular no. 285 of 17 December 2013
- Decree of the Italian Ministry of Economy and Finance no. 169 of 23 November 2020
- Corporate Governance Code for Listed Companies
- UN Agenda 2030 for Sustainable Development and the Sustainable Development Goals
- UN Global Compact Principles
- Universal Declaration of Human Rights
- Joint Declaration of the Italian Banking Association (ABI) and Trade Union Organisations on harassment and gender-based violence in the workplace
- ABI Document "Women in Banks Charter: developing gender diversity"
- National Collective Labour Agreement, articles 15, 16, 17
- Guidelines on the management system for gender equality UNI/PdR 125:2022
- Legislative Decree No. 216/2003 implementing Council Directive 2000/78/EC of 27 November 2000) establishing a general framework for equal treatment in employment and occupation
- 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"
- Law No. 162 of 5 November 2021, containing "Amendments to the code referred to in Legislative Decree No. 198 of 11 April 2006 and other provisions on equality between men and women in the workplace"
- 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"
- Legislative Decree no. 105 of 30 June 2022, "Implementation of directive 2019/1158 (EU) of the European Parliament and the Council, of 20 June 2019, on work-life balance for parents and carers and repealing Council Directive 2010/18/EU
- Law no. 68 of 12 March 1999: "Regulations on the right to employment for persons with disabilities"
- Legislative Decree no. 151 of 14 September 2015 "Provisions to rationalise and streamline procedures and obligations for citizens and businesses and other provisions on employment relationships and equal opportunities, implementing Law no.183 of 10 December 2014"
- Law no. 104 of 5 February 1992 "Framework law for assistance, social integration and the rights of

people with disabilities”

- Law no. 4 of 9 January 2004 “Provisions to support the access of disabled people to IT tools”
- 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
- Legislative Decree no. 24 of 10 March 2023, implementing Directive (EU) 2019/1937 of the European Parliament and the Council, of 23 October 2019, on the protection of persons who report breaches of Union law laying down provisions concerning the protection of persons reporting breaches of national law
- Reference practice UNI/PdR 125:2022 “Guidelines on the gender equality management system which provides for the adoption of specific KPIs (Key Performances Indicators) relating to gender equality policies in organisations”
- Law no. 164 of 14 April 1982 “Provisions governing the correction of the assigned gender”
- Regulation (EU) 2016/679 as later amended and supplemented
- Italian Legislative Decree no. 196 of 30 June 2003 as later amended and supplemented

Internal regulations:

- Articles of Association
- Code of Ethics
- Corporate Governance Code of the BPER Group
- Organisation and Management Model pursuant to Legislative Decree 231/01
- Policy for the Management of Human Resources
- BPER Group Sustainability Policy
- Delegated powers of the Corporate Bodies and Top Management Executives of BPER Banca S.p.A
- Succession Plans of the Top Management of BPER Banca S.p.A.
- Rules for the selection and appointment of the Heads of Corporate Control Functions
- Personal Data Protection Policy