

# Compliance Policy of Banca Monte dei Paschi di Siena SpA

This Policy outlines the models and rules adopted by the Monte dei Paschi di Siena Group regarding Compliance, in line with the regulations issued by the Supervisory Authorities and in accordance with the legal provisions that define the operational framework for banking institutions. This framework aims to strike a balance between private objectives and the stability of the financial system as a whole.

Banking activities play a crucial role within the broader socio-economic system, protecting constitutionally significant interests and relying inherently on the trust of customers.

In this context, there is an obligation to establish a dedicated Compliance Function to monitor compliance by identifying and managing related risks. This also serves to enhance the reputation and image of the company, protect customer interests and contribute to overall value creation.

The MPS Group has adopted the definition of non-compliance risk introduced by the Bank of Italy's Supervisory Provisions (Bankit Circular 285/13):

*"The risk of non-compliance with rules is the risk to incur in judicial or administrative sanctions, material financial losses or loss of reputation due to violations of mandatory rules (laws and regulations) or self-regulatory standards (such as statutes, codes of conduct, codes of self-discipline)".*

In accordance with these Provisions, the Compliance Function is:

- permanent, independent of operational and business units, and dedicated to monitoring the risk of non-compliance;
- established by a specific resolution of the Board of Directors, formalising the status and mandate of the Function;
- directly accountable to the CEO/General Manager;
- vested with the authority and resources - both qualitative and quantitative - appropriate to its responsibilities. This includes maintaining specialised technical skills through continuous professional development, participation in ongoing training programmes and job rotation schemes;
- authorised to engage external consultants as required, with the ability to activate resources autonomously in response to regulatory innovations or complex issues;
- separate from the Internal Audit and Risk Control Functions.

Within the MPS Group, in accordance with Supervisory Provisions, the Compliance Function is responsible for:

- assisting the business units in defining methodologies to assess risks of non-compliance;
- identifying appropriate procedures to prevent identified risks, requesting their adoption and verifying their adequacy and proper implementation;
- identifying on an ongoing basis the regulations applicable to the Bank and assessing their impact on business processes and procedures;
- proposing organisational and procedural changes to ensure adequate oversight of identified compliance risks;
- preparing information reports for the Corporate Bodies and relevant functions (e.g., Operational Risk Management and Internal Audit);
- evaluating the effectiveness of organisational adjustments and participating in the ex-ante assessment of compliance with applicable regulations for all innovative projects;
- providing advice and assistance to the Corporate Bodies on all matters where the risk of non-compliance is relevant.