

Rules on Preventing and Combatting Gender-Based Harassment in the Workplace

MAIN INFORMATION CONTENT

This document sets out the general principles and unacceptable behaviours to ensure a workplace free from gender discrimination, violence and harassment. Each individual is expected to comply with these guidelines in accordance with the Gender Equality Policy, the Code of Ethics, external regulations, Italian and international standards and the initiatives to which the Monte dei Paschi di Siena Group (hereinafter referred to as the MPS Group) has voluntarily subscribed with a view to preventing and eliminating all forms of violence.

Everyone has the right to a workplace free from violence and harassment and has a responsibility to contribute to an environment based on mutual respect. In particular, those in positions of responsibility are required to promote and maintain a culture of "zero tolerance" of violence and harassment in the workplace and to support employees in using the appropriate channels to report incidents.

The MPS Group is committed to ensuring a work environment based on respect for the equal treatment and dignity of all individuals, regardless of their background, nationality, age, physical characteristics, political opinions, religion, marital status, gender, sexual identity and orientation, disability or any other category protected by law.

AREAS OF COMMITMENT

The MPS Group is dedicated to upholding the rights and freedoms of individuals and promoting a culture of equal opportunities, and is committed to:

- promoting these principles throughout the organisation and ensuring compliance at all levels of the workplace;

- preventing, identifying, continuously monitoring, and prohibiting any instances of gender discrimination, harassment, violence, and sexually inappropriate behaviour;
- rejecting any behaviour that could be perceived as intimidating and/or coercive, including behaviour related to decision-making in the course of one's duties or any actions that exploit a position of power or hierarchical superiority;
- not tolerating any behaviour that constitutes physical or psychological violence, coercion, harassment or discrimination of any kind;
- ensuring the right to privacy for all individuals involved in a potential report of misconduct;
- supporting individuals who report inappropriate behaviour and protecting them from any form of retaliation;
- implementing training and information programmes aimed at raising awareness and preventing such issues.

REPORTING AN INCIDENT

It is essential for the protection of individuals and the work environment that anyone who believes they have been the target of, or a witness to, inappropriate behaviour reports such incidents through the following channels:

- the designated Manager;
- the Human Resources Department;
- the Whistleblowing Portal - via a dedicated web platform or verbally via the dedicated telephone service;
- the Internal Protection Committee.

The MPS Group is committed to investigating and addressing reported incidents promptly and impartially, while ensuring the confidentiality of all parties involved. A regular report on the reports received is also provided.

LEGISLATIVE AND REGULATORY REFERENCES

In addressing key issues related to preventing and combatting gender-based harassment, the Group complies with current legislation and the principles of the voluntary initiatives to which it has subscribed, in accordance with the International Labour Organization Convention No. 190 of 2019, which entered into force in Italy through Ratification and Implementation Act No. 4 of 15 January 2021.

The following are the voluntary initiatives to which the Group has subscribed:

- Memorandum of Understanding of 4 October 2023 between the Minister for the Family, Births and Equal Opportunities and the President of the Italian Banking Association to prevent and combat violence against women and domestic violence;
- Memorandum of Understanding of 25 November 2019 and subsequent extensions, promoted by the Italian Banking Association to facilitate the repayment of loans by women who are victims of gender-based violence.

DEFINITIONS

Discrimination: Discrimination is any act, practice or behaviour, even if unintentional, that adversely affects individuals by treating them unfairly because of their gender (including gender identity or expression), national or ethnic origin, foreign or national status, religion, sexual orientation, personal or political beliefs, physical characteristics, age, marital status, parental status, disability, status as a victim of domestic violence, sexual offences or stalking, or any other category protected by law.

Harassment: Harassment is where an unwanted conduct related to the sex of a person occurs, with the purpose or effect of violating the dignity of an employee and of creating an intimidating, hostile, degrading humiliating or offensive environment that does not respect the physical or psychological integrity of the individual.

Sexual harassment: Sexual harassment is where any form of unwanted physical, verbal or non-verbal conduct of a sexual nature occurs, with the purpose or effect of violating the dignity of an employee and of creating an intimidating, hostile, degrading, humiliating or offensive environment.

Unconscious bias: Unconscious biases are attitudes that are deeply ingrained in our habits and that we think are normal, but which actually have discriminatory origins. These mental attitudes, which influence our daily lives, often shape our behaviour and perceptions, usually without us being aware of it.

Gender-based violence: Gender-based violence is violence that is directed against a person because of their sex or gender, or violence that affects persons of a particular sex or gender.