



***BFF BANKING GROUP'S
DIVERSITY & INCLUSION POLICY***

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TABLE OF CONTENTS

DEFINITIONS.....	1
CHAPTER I: INTRODUCTION.....	4
CHAPTER II: ROLES AND RESPONSIBILITIES.....	7
1. Board of Directors.....	7
2. CEO.....	7
3. Corporate Bodies of the Subsidiaries.....	7
4. Human Resources and Organisational Development Function.....	7
5. Group ESG & Financial Reporting Officer Support Organisational Unit.....	8
6. Top Management.....	8
7. Inclusion Board.....	8
CHAPTER III: REFERENCE PRINCIPLES, ISSUES AND COMMITMENTS.....	10
1. Promotion and enhancement of BFF People.....	10
2. Equal opportunities.....	11
3. Equal treatment and non-discrimination.....	14
4. Work life balance.....	14
CHAPTER IV: IMPLEMENTATION, MONITORING AND REPORTING.....	16

DEFINITIONS

Addressees:	BFF People (as defined below) and all persons acting in the name and/or on behalf and/or in the interest of BFF and the Group (as defined below), or having business relations or collaborations of another nature therewith (e.g. suppliers, consultants, collaborators, brokers)
Bank or BFF or Parent Bank:	BFF Bank S.p.A..
BFF People:	all employees of the Bank and Group companies.
Board of Directors or Board:	the " <i>body with strategic supervision functions</i> " of the Parent Company, which is entrusted with guidance functions of the Bank's management, by, <i>inter alia</i> , reviewing and resolving upon business or financial plans or strategic transactions, pursuing its Sustainable Success.
Board of Directors of the Subsidiary or Board of the Subsidiary of BoD of the Subsidiary:	the corporate body of Group companies adopting the traditional governance model (or similar models), which is entrusted with management guidance functions, by, <i>inter alia</i> , reviewing and resolving upon business or financial plans or strategic transactions.
Board of Statutory Auditors:	the " <i>body with control functions</i> " of the Parent Company, which monitors compliance with legal, regulatory and statutory provisions, proper administration and the adequacy of the Bank's organisational and accounting structures, including at Group level.
Board of Statutory Auditors' Diversity Policy:	the " <i>Diversity Policy of the Board of Statutory Auditors of BFF Bank S.p.A.</i> " adopted by the Bank.
CEO:	the " <i>body with management functions</i> " of the Parent Company. The director to whom, pursuant to the Italian Civil Code, day-to-day management tasks, understood as the implementation of the guidelines resolved upon by the Board in the exercise of the strategic supervision function, are delegated by the Board of Directors.
CLF:	Legislative Decree No. 58 of 24 February 1998 - " <i>Consolidated Law on Financial Intermediation</i> ", as subsequently amended.
Code of Ethics:	the code of ethics adopted by the Bank, which the members of Corporate Bodies and employees are required to comply with. Said code defines the principles of conduct (e.g. rules of ethics and provisions to be complied with in relations with clients) to which business activities must be inspired.

<i>Corporate Bodies:</i>	collectively, for companies adopting the: i) traditional governance model (or similar models), the Board of Directors and the CEO; ii) dual governance model (or similar models), the Management Board.
<i>Corporate Governance Code or Code:</i>	the Corporate Governance Code for Listed Companies, approved by the Corporate Governance Committee set up by Business Associations (ABI, ANIA, Assonime, Confindustria), Borsa Italiana S.p.A. and by the Association of professional investors (Assogestioni) in January 2020.
<i>Corporate Functions:</i>	the set of duties and responsibilities assigned for the performance of a given phase of the business activity.
<i>Diversity Policy of the BoD:</i>	the " <i>Diversity Policy of the Board of Directors of BFF Bank S.p.A.</i> " adopted by the Bank.
<i>Group or BFF Group:</i>	the BFF banking group.
<i>Legislative Decree No. 254/2016:</i>	Legislative Decree No. 254 of 30 December 2016, implementing 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, upon occurrence of the parameters identified therein, except for voluntary compliance.
<i>Management Board:</i>	the Corporate Body of Group companies adopting the dual governance model (or similar models), which is entrusted with management tasks, in implementation of the guidelines resolved upon by the competent Corporate Bodies.
<i>NFS:</i>	the consolidated statement on non-financial information pursuant to Legislative Decree No. 254/2016, adopted from time to time by the Bank.
<i>Operational Plan:</i>	the document containing the actions and interventions necessary to achieve the Policy's objectives, as approved by the Bank's Board of Directors.
<i>Parent Company's Business Plan</i>	the document approved by the Board of Directors of the Parent Company that illustrates, in qualitative and quantitative terms, the Group's strategic objectives, the actions identified to achieve them and the estimated economic and financial results expected.
<i>Policy:</i>	this " <i>BFF Bank Group's Diversity & Inclusion Policy</i> " approved by the Board of Directors on 22 December 2022.
<i>Remuneration Policy:</i>	the " <i>Remuneration and incentives policy in favour of members of the strategic supervision, management and control bodies, and personnel of the BFF banking group</i> ", in force from time to time.

<i>Subsidiary(s)</i>	the companies belonging to the Group and subject, directly or indirectly, to the Parent Company's direction and coordination activity.
<i>Sustainable Success:</i>	the objective guiding the Board's action, which is represented by the creation of long-term value for the benefit of shareholders, taking into account the interests of other stakeholders relevant to the Group.
<i>Top Management:</i>	the senior managers who are not members of the Board of Directors and have power and responsibility for planning, directing and controlling the Bank's activities, including at Group level.

CHAPTER I: INTRODUCTION

The Bank, at Group level, recognises in the values of diversity and inclusion key resources aimed at innovation, productivity growth and sustainability of the Bank and its Subsidiaries.

The Policy defines the inspiring principles to constantly and progressively promote diversity and inclusion both within the Group, thus fostering an inclusive working environment for BFF People, supporting the commitment to diversity and inclusion, believing this to be a factor that has positive effects on all Bank's stakeholders.

This Policy is based on the idea that the ultimate goal to be pursued to support diversity is to ensure that every single person has access to the same opportunities and equal treatment. Hence, ultimately, that everyone has the opportunity to be assessed on the basis of his or her values, skills and merits, regardless of race, ethnicity, age, gender, disability or other characteristics (such as, for example, marital and/or parental status) that might represent a discriminating factor, enabling the Bank, at Group level, to welcome and nurture the best talents, to be hired on the basis of objective, non-discriminatory and, of course, meritocratic criteria.

The Group operates in a multinational context where people express a significant heritage of diversity, the enhancement of which constitutes at the same time a competitive advantage and a growth and enrichment opportunity for the Group itself, in the belief that the most innovative ideas and the best solutions derive from a working environment where people can express their uniqueness.

This Policy, however, does not concern the composition of the Bank's corporate bodies (which is governed, inter alia, by the Diversity Policy of the BoD and the Diversity Policy of the Board of Statutory Auditors, to which express reference is made), but, more generally, is addressed to BFF People, who represent a fundamental key to the Bank's success.

A diversity of skills, experiences, ideas and points of view fosters a better understanding of customers' needs and greater competitiveness in the market. The Bank is aware that plurality and diversity contribute to improving business performance, as well as meeting stakeholder expectations on ESG (Environmental, Social, Governance) issues.

The Group believes that enhancing Sustainable Success over the long term cannot be achieved without enhancing diversity and recognising the importance of inclusion, considering them a cornerstone of the Bank's operations, in the interest of all Group's stakeholders.

Therefore, supporting diversity and inclusion, as well as equal opportunities at all levels and in all contexts of the Group's activities, is one of the assumptions of the Bank's strategy, which implies the creation of a serene, safe and prosperous working environment that promotes well-being and creativity, where everyone can feel highly regarded in their own peculiarities, while respecting equal treatment, the principle of non-discrimination and, of course, the promotion of human rights.

Bearing in mind that achieving the objectives set out in the Policy as well as its concrete implementation ultimately depend on the behaviour of BFF People, the Group undertakes to design and provide training courses for them to be aware of the content of this Policy and understand its relevance in creating a prosperous working environment, a fundamental basis for their not only professional but also personal growth.

By reason, moreover, of the purposes the Policy aims to achieve, conduct in conflict with the principles set out in this Policy will not be tolerated, and may be subject to specific sanctions, including of a disciplinary nature.

This Policy represents only a part of the tools adopted by the Bank aimed at promoting corporate and BFF People's wellbeing as a prerequisite for the Bank's Sustainable Success. Therefore, the principles set out herein translate into operational corporate regulations inspired thereby, as well as into a series of actions - included in the Operational Plan - demonstrating the Group's attention and commitment to properly implementing diversity and inclusion issues, in accordance also with its Code of Ethics.

As part of the drafting/updating process of the Group's Business Plan, the Bank's Board of Directors establishes, upon proposal of the CEO, after consulting the Human Resources and Organisational Development Function, in coordination with the Group ESG & Financial Reporting Officer Support Organisational Unit, the Operational Plan for defining the necessary actions and interventions to achieve the objectives set forth in the Policy. Annually, the Bank's CEO submits to the Board of Directors an update on the execution of the Operational Plan in terms of (i) periodic monitoring of the results achieved both in qualitative and quantitative terms; (ii) preparation of possible corrective actions, with indications of the competent Corporate Functions. The reporting of the activities undertaken and the objectives achieved are reported in the NFS.

This Policy is adopted by the Board of Directors, in compliance, *inter alia*, with the applicable legal and regulatory provisions, the European and international provisions on sustainability and protection of human rights, as well as the recommendations on diversity contained in the Corporate Governance Code.

In defining guidelines and intervention areas as regards diversity & inclusion, the Bank, at Group level, is inspired not only by the principles and rules laid down by national legislation, such as, for example, the Constitution of the Italian Republic, Law 300/1970 (the so-called "Workers' Act")¹, and Circular 285/13 on remuneration policies and systems and the EBA Guidelines with reference to the assessment of pay gap, but also by international principles, such as, for example, the United Nations Global Compact Principles, and those included in the Declaration on Fundamental Principles and Rights at Work and in the eight Fundamental Conventions of the International Labour Organisation (ILO), in the Universal Declaration of Human Rights² and in the subsequent international conventions on civil and political rights and on economic rights, social and cultural rights, in the 2030 Agenda for Sustainable Development and its Sustainable Development Goals (SDGs), in the UN Women's Empowerment Principles, in the UN Conventions on the rights of women, on the elimination of all forms of racial discrimination, on the rights of the child, on the rights of persons with disabilities, and in the ILO Convention on violence and harassment.

¹ We refer, in particular, to Article 14, which states '*The right to form trade union associations, to join them and to carry out trade union activities is guaranteed to all workers in the workplace*', and to Article 15, according to which '*Any pact or act aimed at: a) making the employment of a worker conditional on his joining or not joining a trade union association or ceasing to be a member of it [omissis] shall be null and void*'.

² With specific reference to Article 32, according to which '*Child labour is prohibited. The minimum age for admission to work may not be lower than the age at which compulsory schooling ends, subject to rules more favourable to young people and except for limited exceptions. Young people admitted to work must benefit from working conditions appropriate to their age and be protected against economic exploitation or any work that may undermine their safety, health, physical, mental, moral or social development or that may jeopardise their education*'.

CHAPTER II: ROLES AND RESPONSIBILITIES

1. Board of Directors

The Board of Directors fosters and ensures the dissemination of diversity, equity and inclusion within the Group. In particular, to this end, it:

- approves the Policy;
- approves the Operational Plan;
- with the support of the Remuneration Committee, assesses the gender-neutrality of the Remuneration Policy and reviews the pay ("*Gender Pay Gap*") and career gap and its development over time.

2. CEO

The CEO submits to the Board of Directors the guidelines to promote an inclusive culture as a priority of the Bank and its Subsidiaries.

He is responsible, with the support of the Human Resources and Organisational Development Function and the Group ESG & Financial Reporting Officer Support Organisational Unit, in the context of the preparation of the Operational Plan, for:

- ensuring the proper adoption of the Policy;
- defining tools and policies that encourage an inclusive working environment;
- selecting and developing leaders in the organisation who can lead the construction of an environment in which people can have equal growing and fulfilment opportunities.

3. Corporate Bodies of the Subsidiaries

The Corporate Bodies of the Subsidiaries adopt the Policy and, on the basis of the indications regarding instruments and objectives assigned by the CEO:

- ensure the proper adoption of the Policy in the Subsidiary;
- implement instruments and policies that encourage an inclusive working environment.

4. Human Resources and Organisational Development Function

In coordination with and under the supervision of the CEO, the Human Resources and Organisational Development Function, also through the homologous structures of the Subsidiaries, is responsible for the general direction and supervision of all Diversity-related plans.

By cooperating with the concerned Corporate Functions, and, in particular, in coordination with the Group ESG & Financial Reporting Officer Support Operational Unit, the Human Resources and Organisational Development Function prepares - within the Operational Plan - training plans, and takes care of their implementation, and organises workshops and activities, consistent with the Policy, that are able to constitute an organic and constructive path, having as ultimate goal the internalisation of inclusion and diversity.

In addition, the Human Resources and Organisational Development Function is: (i) an active player in the promotion and monitoring, of behaviours held within the organisation; (ii) a guarantor of compliance with the Policy for the areas within its competence; and (iii) responsible for the implementation of the Group's Policy and guidelines on diversity and inclusion.

5. Group ESG & Financial Reporting Officer Support Organisational Unit

The Group ESG & Financial Reporting Officer Support Organisational Unit supports the Human Resources and Organisational Development Function in organising the activities within the latter's remit and is constantly updated on regulatory developments and national and international diversity and inclusion initiatives.

6. Top Management

The principles of diversity and inclusion are shared with the Top Management, who can propose and/or determine the related activities and are responsible for their correct application in their respective teams.

7. Inclusion Board

The inclusion board (the '*Inclusion Board*') is a committee the Bank may set up; the committee is composed of between 7 and 11 employees, representing the Bank's various legal entities, and selected, on the basis of self-nominations, by the Human Resources and Organisational Development Function, in agreement with the CEO and the Group ESG Reporting & Financial Reporting Officer Support Organisational Unit, with the aim, for example, of:

- collecting and representing inclusion issues within the Group;
- initiating discussions with the leadership team and defining priorities of action;
- promoting, through a clear and transparent approach, the initiatives and actions implemented at Group level, on the matter of inclusion and participation in corporate life;

- proposing measures aimed at avoiding Diversity-related prejudices, both in the recruitment process and in the subsequent professional development and promotion phase,
- promoting inclusion across Countries and national cultures where the Bank, at Group level, is present,

whose composition and regulation are laid down in a special regulation.

The Inclusion Board is responsible for promoting a culture of diversity and inclusion through a listening and feedback function to BFF People, the Human Resources and Organisational Development Function and the Top Management.

CHAPTER III: REFERENCE PRINCIPLES, ISSUES AND COMMITMENTS

1. Promotion and enhancement of BFF People

In compliance with the Code of Ethics, the Group ensures BFF People a working environment free from racism and any form of discrimination. Therefore, no form of discrimination based on race, colour, gender, age, religion, physical condition, marital status, sexual orientation, citizenship, ethnic origin or any other behaviour contrary to human rights standards is allowed. Harassment or situations making the work environment intimidating or hostile are also not tolerated in internal and external working relations. No form of retaliation is tolerated against employees and stakeholders who have complained about discrimination or harassment episodes, or who have reported them to their bosses and/or using tools such as the Group's internal whistleblowing platform.

Therefore, the Group encourages each BFF Person to report any episodes of discrimination of which they have been victims or witnesses in order not only to, possibly, sanction the person responsible but also to allow the Bank itself to assess the effectiveness of anti-discrimination and inclusion measures adopted and, if deemed necessary or appropriate, to supplement them and/or adopt corrective or preventive measures, to be identified also on the basis of the specific episodes reported.

Furthermore, the Group recognises the importance of embracing the heritage of history, experience and points of view coming from the different realities, including international ones, in which it operates, developing a shared identity that is attentive to the needs of the various communities of which it is composed.

Bearing in mind that the culture of diversity and inclusion has several dimensions, each of which is fundamental to identify - and consequently enhance - the peculiarities typical of each BFF Person, in preparing the Policy, the Bank focused on the following issues:

- gender;
- culture and ethnicity;
- age and generational diversity;
- religious orientation;
- disability;
- gender identity and sexual orientation;
- professional background,

considering them all worthy of being protected and enhanced at Group level (the '*Diversity*').

Therefore, all initiatives undertaken by the Bank (or it intends to undertake), for the purposes of the proper implementation of this Policy, are oriented towards the transversal integration of all above listed dimensions, without, however, neglecting other possible diversity components that could generate other discrimination of any kind.

Under an organisational and operational profile, the principles of promotion and enhancement are reflected in a variety of business processes affecting BFF People, such as:

- recruitment and selection activities;
- training activities;
- development and talent enhancement paths;
- remuneration systems;
- work-life balance,

as further specified below.

2. Equal opportunities

The Bank, at Group level, regards Diversity at all levels of the corporate organisation. With this Policy the Bank further formalises its commitment to adopt a proactive approach in fostering equal opportunities at all levels, starting from the selection and hiring phase of BFF People, which is based solely on objective and meritocratic criteria, and ending with the enhancement, again on a meritocratic basis, of each person's inclinations and talents.

For instance, recruitment phases are conducted in such a way as to avoid as much as possible the so-called unconscious biases (through tools such as: competency-based interviews, selection paths involving several people belonging to different Organisational Units, testing, etc.), and individual aptitudes are enhanced through structured professional growth paths, inspired by the Principle of Neutrality mentioned below.

The Bank, at Group level, does not request and does not process personal data, either during the personnel selection phase or throughout the entire employment relationship, relating to culture and ethnicity, religious orientation, gender identity and sexual orientation.

The Group is also committed to fostering an open, tolerant and continuously improving corporate culture, including by enhancing Diversity and a climate of inclusion, which enables all BFF People to freely and fully express their potential.

The Bank, also in compliance with the regulatory provisions and the Corporate Governance Code on gender balance in the composition of corporate bodies (which, as anticipated, is regulated, *inter alia*, in the Diversity Policy of the BoD and the Diversity Policy of the Board of Statutory Auditors) intends to ensure diversity and inclusion in managerial and executive positions and, more generally, is committed to guaranteeing them at all levels of the Group's organisation, regardless of the corporate role held.

In implementation of these principles, the Bank sets its own remuneration system, including diversity targets related to the individual 'MBOs' of employees falling under the Board competence³, which are subject to the prior assessment of the Remuneration Committee.

This approach is also reflected in the Remuneration Policy, where the enhancement of diversity in organisational behaviour (both of gender and nationality) in the selection of managerial positions is made explicit. For example, in order to increase the presence of women or people from different geographical backgrounds in the Group's key positions, the Bank requires that the short lists of selections opened during the year must include, by at least 50%, women or people from different nationalities from the Country for which the selection is being made.

Furthermore, the Bank:

- fosters and supports the added value expressed by the integration of different cultures and experiences, both from the point of view of sharing skills, and with a view to fostering the development of an intercultural vision that is open to dialogue, without prejudice and with an inclusive view; and
- undertakes to put in place awareness-raising initiatives aimed at overcoming Diversity-related prejudices, and at fostering the development of processes that ensure the effective inclusion of all individuals, through a transparent and broad line of communication and training.

At Group level, through the Human Resources and Organisational Development Corporate Function (as well as through the homologous structures in Group companies), performance assessment criteria

³ Personnel whose remuneration and incentive systems, annual targets and related assessment are defined by the Board of Directors, namely: (i) the CEO; (ii) Directors holding special offices; (iii) the Group's 'Senior Executives'; (iv) 'Executives' reporting directly to the CEO; (v) Heads of Corporate Control Functions.

are applied such as to ensure fairness at every stage of the personnel selection and training process and in career advancement, as well as a remuneration based on the skills and professionalism of each individual, set up in such a way as to avoid Diversity related inequalities. These processes are applied, *inter alia*, in the regulatory and operational body of the individual Group companies.

With a view to implementing these principles, the Bank has enshrined, through its Remuneration Policy, its gender-neutrality in relation to BFF People, as well as equality – for same roles, functions and geographical locations - by ensuring, for the same activity carried out, in relation to the content of responsibilities, activities and time required to perform them, that they have an equal level of remuneration, also in terms of conditions for its recognition and payment (the '**Principle of Neutrality**').

Furthermore, the Bank, at Group level, undertakes to:

- establish the modalities whereby to identify and manage any bias in talent management;
- carry out training activities, dedicated to the entire corporate population - including the Top Management - with a view to inclusion, on Diversity related matters, as well as on the stereotyping of people and the so-called 'unconscious bias';
- measure workforce diversification in the context of the succession bench, based on Diversity, setting reference targets in advance;
- analyse the gender pay gap of BFF People, giving evidence of the results achieved, *inter alia*, in the NFS, in order to structure a transparent path towards the definition and disclosure of clear and achievable targets.

The Group is committed to promoting the rights of people with disabilities and fostering their potential by ensuring a role suited to their skills and needs, and by fostering conditions of well-being and support.

In particular, the Bank:

- ensures the integration of people with disabilities into the work environment;
- promotes the creation of an environment that respects disabilities and is aware of the care required for their appropriate management;
- contributes to the breaking down of cultural and physical barriers;
- encourages the formation of mixed working teams, as an opportunity to promote the personal and professional growth of all those involved, at all levels of the corporate organisation; and

- encourages integration and equal opportunities of differently-abled workers in the company context, both in the induction phase and in career progression and remuneration treatments.

In addition, the Group is committed to implementing and developing initiatives that favour the insertion and inclusion of its BFF People with disabilities, such as, without limitation, specific induction programmes and properly trained listening points suited to the individual's needs, through, *inter alia*, the involvement of the Inclusion Board, where established.

3. Equal treatment and non-discrimination

The Group takes all necessary actions to prevent episodes of discrimination, at all company levels and with reference to any Group activity, related to Diversity.

As also stated in the Code of Ethics, the Group considers it a priority to create a positive working environment oriented towards maximum mutual cooperation and teamwork, the sharing of objectives, in which each individual can fully express his or her potential, free from any conditioning or any form of intimidation.

In addition, the Group recognises the need and importance of capturing the diversity of experiences from each local reality in which it operates in order to develop a common identity and a shared corporate culture.

The Group therefore does not tolerate, in both internal and external relations, discriminatory or hostile behaviour, nor any form of retaliation motivated by discriminatory reasons against BFF People or Group Stakeholders, as well as those who have reported discrimination.

In the definition of policies aimed at equal treatment (and, therefore, at avoiding discrimination), the Bank provides, in its Remuneration Policy, for the application of the aforementioned Principle of Neutrality.

4. Work life balance

The Bank, at Group level, is committed to improving work-life balance through specific welfare initiatives, aimed at the corporate population, focusing on work flexibility tools and tailor-made solutions, to improve the ability to balance personal and professional burdens.

The Group, with a view to promoting the organisation's sustainable success, may evaluate from time to time tools in the area of work-life balance, such as, without limitation:

- smartworking agreements;
- hourly flexibility;

- support measures towards BFF People presenting fragilities.

Furthermore, the Group is committed to promoting induction and training initiatives addressed to its employees for returning to work following so-called parental leave.

CHAPTER IV: IMPLEMENTATION, MONITORING AND REPORTING

This Policy is communicated to all Addressees and specifically for BFF Personnel, its knowledge is also fostered through appropriate and specific awareness raising and training initiatives, proportionate and calibrated to the roles, responsibilities and functions of each area of operation.

The Policy is disseminated by means of publication on the website and intranet of Group companies, and is brought to the attention of newly recruited persons by delivering the "*welcome kit*", in order to foster a solid awareness of its approach, as well as for transparency purposes towards the market, as to the principles and values that form an integral part of the cultural heritage of the Bank and the Group.

The principles and commitments laid down in the Policy apply to all persons bound by employment or collaboration relations with each of the Group's entities and, in general, to all BFF People, regardless of the nature of their relations with the Group.

This Policy shall be reviewed at least every two years, in order to ensure it is up-to-date with the Group's needs and any changes in the applicable regulations possibly occurred in the meantime, including at international level, as well as with market needs and the evolution of best practices.

The monitoring of the outcomes of the Policy application and its updating are the responsibility of the Board of Directors. The description of these outcomes, pursuant to Article 123-bis of the CLF, is set out, inter alia, in the NFS.