

WHISTLEBLOWING POLICY

Banca Finanziaria Internazionale has adopted a Whistleblowing Policy (“Politica di Gruppo per la gestione delle segnalazioni di violazioni”), implementing – in compliance with the requirements of the Bank of Italy – **a system of reporting by the staff or by other stakeholders** of acts or facts that could constitute violations of prescriptions regulating the activities carried out by any company of the banking Group, assuring the maximum degree of confidentiality to the parties involved.

The Policy applies to all entities of Banca Finanziaria Internazionale Banking Group.

The Policy aims to ensure a work environment in which anyone (employees, consultants, suppliers, other service providers) feels free and safe to report allegations related mainly to unlawful conducts - by act or omission - performed or having an impact on the companies’ activity, caused or causing economic prejudice or reputational damage to the image of the Banking Group and/or its employees and that:

- i. is unlawful, incorrect or immoral;
- ii. breaches laws or regulations; or
- iii. does not comply with the internal procedure of each Company of the Banking Group.

The Policy, therefore, describes the process of managing notices of unacceptable conducts, identifying appropriate communication channels in order to ensure receipt, analysis and use of notices by the relevant corporate structures.

Potential violations or suspected wrongdoing - in accordance with Whistleblowing Policy - can be notified by e-mail to segnalazioneviolazione@bancafinint.com.

The company, in order to avoid harassment and discrimination on the whistleblower, safeguards the anonymity and ensures that the notices are treated in an appropriate and correct manner.