

Diversity & Inclusion Policy

Procedures, Policies and Rules UniCredit Bank Ireland

UniCredit Bank Ireland p.l.c

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For internal use only

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1 INTRODUCTION

UniCredit Bank Ireland plc is committed to a workplace environment that promotes diversity and inclusion and creates an open and inclusive culture where everyone feels valued irrespective and indeed because of their differences.

As part of UniCredit Group, the Company is proud of a decade-long commitment within the Group, where highly diverse staff is empowered by creating an equal opportunities workplace where people of all ages, genders and cultural backgrounds can contribute to decision making.

2 KEY PRINCIPLES AT UNICREDIT GROUP

UniCredit's Group diversity and inclusion targets were identified in 2009 through stakeholder engagement and have since been prioritised by the management as materially important to business strategy, and are therefore actively monitored.

The bank's Global Policy for Gender Equality in 2013 established a framework for creating a level playing field throughout the organisation as a way of generating higher value. In addition, the Group has committed to doubling its level of women in senior management roles at Group level to 20% by 2022.

Diversity alone is not enough. Creating an inclusive culture where all voices are heard unlocks performance and job satisfaction.

The Group recognise that inclusion is strategic to remain a pan-European winner and it underpins guiding principles of Ethics and Respect. Employees are expected to contribute to creating and maintaining a work environment that is respectful and non-intimidating, and where differences in age, race, nationality, religion, gender and sexual orientation are embraced and promoted.

Diversity and inclusion policies are a cornerstone of the human capital strategy of our business model, which has successfully delivered value creation over time. Promoting gender equality and inclusion is a way to improve the well-being of individuals and make our business strategies more sustainable in the long term. Serving our customers is our top priority, and to do this we rely on our highly qualified and committed employees who excel at working together.

In 2019, 55 per cent of new hires in the Group were women and, even more importantly, 38 per cent of new Executive Vice Presidents (EVPs) were female, supporting our pledge to build a tangible pipeline for a more gender diverse leadership team while providing new role models for the younger generation. In addition, the Group's Millennial Board consisting of employees from 22-32 years of age, working to challenge pre-conceived patterns and raise awareness of the views of new generations (on banking topics), proposing innovative ideas and solutions, is 60 per cent female.

3 SCOPE OF THE POLICY AT UNICREDIT BANK IRELAND PLC

The Bank is an equal opportunities employer and is committed to providing equal opportunities in employment and will not unlawfully discriminate against job applicants, employees of the Bank, agency workers and self-employed contractors of the Bank on the grounds of their age, disability, gender reassignment, marital or civil partner status, pregnancy or maternity, race (which includes colour, nationality, ethnic or national origins), religion or belief, sex or sexual orientation ("Protected Characteristics").

The Bank is therefore committed to providing a working environment free from harassment, bullying and discrimination, which the Bank considers unacceptable behavior, and promotes diversity and equality of opportunity in the workplace.

This policy applies to all employees of the Bank, and agency workers and self-employed contractors of the Bank as well as to job applicants, visitors, customers, clients and suppliers or other business contact with whom an employee might reasonably expect to come into contact in the course of his or her employment.

Also, this policy applies to employees both in the workplace and at work-associated events such as meetings, conferences and work-related social events, whether on the premises or off-site.

The policy applies to all aspects of the Bank's working practices and therefore applies to the recruitment and selection of employees, terms of engagement with agency workers and self-employed contractors, terms and conditions of employment or service, training, salary, work allocation, promotion, the conduct of the Bank's grievance and disciplinary procedures and termination of employment.

The Bank's recruitment, selection and promotion procedures and general policies and practices will be periodically reviewed to ensure that this equal opportunities policy is being implemented.

All employees and workers are required to follow and implement the Bank's equal opportunities policy and to complete any Bank training and development activities to ensure that they are able to carry out their duties and responsibilities in terms of promoting, developing, implementing and reviewing the policy arrangements in the course of their work. Failure to do so may lead to disciplinary action up to and including dismissal.

In issuing this policy, the Bank has three main objectives:

- To encourage its employees and workers to take an active role against all forms of discrimination and / or harassment
- To deter employees and workers from participating in discriminatory behaviour or harassment; and
- To demonstrate to all employees and workers that they can rely upon the Bank's support if they are victims of discrimination and harassment

This policy does not alter or amend employees' contracts of employment or form a part of any such contract of employment. *UniCredit Bank Ireland plc* may amend or change this policy in its absolute discretion from time to time.

3.1 Definitions

"Discrimination" means less favorable and / or detrimental treatment on grounds of one or more of the Protected Characteristics.

The law recognises the following principal forms of discrimination:

- a) Direct discrimination. This occurs when an individual is treated less favorably than another because of one or more of the protected characteristics set out above.
- b) Indirect discrimination. This occurs when a provision, criterion or practice is applied equally to all but it has a disproportionate and detrimental effect on one section of the workforce, because fewer of that group can comply with it, and the requirement cannot be justified in relation to the job.
- c) Failure to make reasonable adjustments. In a case of disability, if the Bank's premises or equipment, materials or working arrangements put a disabled person at a substantial disadvantage, then it is unlawful discrimination not to make any reasonable adjustment which removes or minimises that effect.
- d) Harassment is a form of direct discrimination. It can be defined as unwanted conduct and / or unwelcome behaviour which have the purpose or effect of violating a person's dignity or creating an intimidating, hostile, degrading or humiliating environment for a person. Harassment is dealt with further in the Bank's anti-harassment and bullying policy.
- e) Victimisation is where a person is treated less favourably than another when they have made allegations, brought proceedings, given evidence or complained about the behaviour of someone who has been harassing or discriminating against them or others.

4 COMMITMENT TO DIVERSITY, INCLUSION AND EQUALITY

UniCredit Bank Ireland plc is committed to creating an inclusive working environment which respects diversity of characteristics including but not limited to sexual orientation, age, gender, race, ethnicity, disability, civil status, personality, thinking style and religious beliefs and promotes equality and dignity at work.

The bank is committed to treating all employees, customers and business contacts equally, regardless of gender, civil status, family status, sexual orientation, religious belief, age, disability, race or membership of the traveler community and believes that embracing equality and diversity in the workplace benefits not just the organisation but also individual employees, departments and clients.

The bank recognizes that all employees bring their own background, work style, distinct capabilities, experience and characteristics to their work, reflecting the diversity of customers and markets.

As well as treating people with dignity and respect, *UniCredit Bank Ireland plc* strives to create a supportive environment in which all employees receive equal treatment and equal opportunities, so that every employee can flourish and reach their full potential, regardless of differences, experience or education. Harnessing the wide range of perspectives this diversity brings, promotes innovation and helps make us more creative and competitive.

All employees have the right to work in an environment that is free from sexual harassment, harassment and bullying and where each individual is respected. Any individual who experiences sexual harassment, harassment or bullying will be supported by the organisation in bringing such unlawful behaviour to a close.

4.1 Supporting policies and procedures

The bank will formulate and implement policies and practices that value diversity, provide equality of opportunity and ensure that no job applicant, employee, customer or business associate receives less favourable treatment.

Also, the Bank will ensure that other policies and practices reflect its commitment to treating people fairly, promoting an integrated way of working and respecting the dignity of employees at all times. As such, this overall policy is supported by appropriate harassment and bullying policies, and disciplinary and grievance procedures.

Managers are expected to promote an integrated workplace and proactively eliminate any potential inequities that may run counter to the organisation's policy.

Employees who believe they have suffered discrimination, harassment or victimisation are entitled to raise matters through the appropriate *UniCredit Bank Ireland plc* grievance procedures or the harassment and bullying policies.

A copy of these policies/procedures can be obtained by contacting HR or alternatively logging into the Employee Portal. Complaints will be treated seriously and will be dealt with in a confidential, expeditious manner in as far as reasonably practicable. Employees who make complaints will not be victimised for doing so. Victimisation, if proven, may result in disciplinary action which could result in a sanction of up to and including dismissal. Employees should be aware that making a false allegation deliberately and in bad faith will be treated as misconduct and dealt with under our disciplinary procedure. Pursuance of complaints through these internal procedures does not prejudice an employee in pursuing matters through other available means. Key areas of applicability

4.2 Recruitment and selection

Our recruitment policy reflects our belief that diversity in all areas, including cultural, generational, language and national backgrounds, is necessary in helping us succeed in both domestic and global markets. The organisation will not discriminate against any prospective employee during the recruitment process. Interviews will be carried out objectively and individuals will be judged on merit and their ability to do the job. It is our policy to ensure that as much accommodation as possible is carried out to facilitate the participation of individuals with special needs in the recruitment process and in the workplace.

All applications will be considered on the relative merits of the applicant against the job and / or person specification for the position regardless of any of the protected characteristics.

Employment (temporary or permanent) or internships may not be offered to:

- Customers or business-partners for themselves or third parties in order to secure any improper business advantage, such as inducing the entity or individual to act favorably on, or influence others to act favorably on business proposals or governmental or regulatory decisions to the benefit of the Group;
- Relatives or associates of public officials (unless compliance is informed and gives their prior approval).

The offers for which the hiring process has been competitive and transparent are excluded.

A request from a third party for a job or internship to be offered to a particular person should be treated as a red flag. This is particularly the case where the person making the request is a public official and / or the potential employee or intern is known to be a relative or close associate of a public official.

The Bank aims to ensure that no job applicant receives less favorable treatment on any of the unlawful grounds listed above. Recruitment procedures are intended to ensure that individuals are treated on the basis of their relevant merits and abilities and that sufficiently diverse sectors of the community are reached. Job selection criteria are intended to be justifiable on non-discriminatory grounds as being essential for the effective performance of the job.

To ensure that this policy is operating effectively with respect to recruitment and selection and the other areas identified in paragraph 6.4 above, and to identify those sections of the local community which may be under-represented in employment, the Bank monitors applicants' racial origins, gender, disability and age as part of the recruitment procedure. Provision of this information is voluntary and will not adversely affect an individual's chances of recruitment or any other decision related to their employment. The Bank also maintains records of this data in an anonymized format solely for the purposes stated in this policy. Ongoing monitoring and regular analysis of the data provide the basis for taking appropriate steps to eliminate unlawful direct and indirect discrimination and implement this policy.

Job and person specifications will only include criteria which are objectively required for the duties and responsibilities of the role. Job advertisements will avoid stereotyping or using wording that may discourage particular groups from applying.

If there is a genuine and lawful reason for limiting the vacancy to a particular group, this will be clearly stated, together with the grounds for it, on any advertisements. The Bank retains the discretion to invite applications from individuals whose jobs might be at risk of redundancy, or who are being re-deployed for health or disability reasons, before advertising any post more widely.

Applicants should not be asked about health or disability before a job offer is made. There are limited exceptions which should only be used with the approval of Human Resources. For example:

- Questions necessary to establish if an applicant can perform an intrinsic part of the job (subject to any reasonable adjustments)
- Questions to establish if an applicant is fit to attend an assessment or any reasonable adjustments that may be needed at interview or assessment
- Positive action to recruit disabled persons; or
- Equal opportunities monitoring (which will not form part of the decision-making process)

The Bank will not ask applicants about past or current pregnancy or future intentions related to pregnancy. Applicants should not be asked about matters concerning age, race, religion or belief, sexual orientation, or gender reassignment without the approval of Human Resources (who should first consider whether such matters are relevant and may lawfully be taken into account).

The Bank is required by law to ensure that all employees are entitled to work in Ireland. Assumptions about immigration status will not be made based on appearance or apparent nationality. All prospective staff, regardless of nationality, must be able to produce original documents (such as a passport) before employment starts, to satisfy current immigration legislation.

4.3 Terms and conditions of employment

The Bank will review terms and conditions of employment, service benefits, and facilities regularly to ensure that they are free from all forms of unlawful discrimination on grounds of any protected characteristics, parental responsibilities or part-time or fixed term worker status.

Grievance and disciplinary procedures will be operated without discrimination on the grounds of any protected characteristics, parental responsibilities or part-time or fixed term worker status.

4.4 Training, career development and performance appraisal/promotion

All employees (and workers where applicable) will be eligible to receive relevant training (according to business needs) to enable them to improve their performance and to achieve the performance standards and targets set for them by the Bank, regardless of any protected characteristics, parental responsibilities or part-time or fixed term worker status.

The Bank will also ensure that opportunities for training, career development and transfer within the Bank are made equally available to all employees (and workers where such opportunities are intended to apply to all workers).

Promotion within the Bank is based on personal merit and the reasonable requirements of the job regardless of any protected characteristics, parental responsibilities or part-time or fixed term worker status.

Performance appraisals and feedback will be carried out in a sensitive, non-discriminatory manner. The organisation will offer the same development and training opportunities to all employees to achieve high standards of performance. The organisation rewards excellence and employees will be promoted on the basis of merit.

4.5 Disability

The Bank values the individual contribution of all employees and workers, and prospective employees or workers from all sectors of the community. The Bank is committed to facilitating the employment of disabled individuals wherever practicable, and to achieve that result it operates the Code of Good Practice on disability as set out below.

The Bank will take reasonable steps to ensure that the working environment, working practices and terms and conditions of employment or service do not prevent disabled people from taking up engagements with the Bank.

The Bank will bear in mind the desirability of avoiding barriers to the employment of disabled people when acquiring and fitting out buildings with equipment and devising working practices.

Where required, the Bank will make reasonable adjustments to recruitment arrangements to the working environment, to working practices and to terms and conditions of employment so as to ensure that no particular disabled person is placed at an unreasonable disadvantage as a result of the Bank's arrangements.

A decision not to make an adjustment which might enable or assist an employee or a worker or a prospective employee or worker to be employed or engaged in a particular capacity will not be taken below the level of managing director. Before making such a decision, the managing director will ensure that all possible adjustments have been fully investigated, including carrying out consultation with the employee or prospective employee concerned and taking any appropriate expert advice.

If an employee or worker is disabled, or becomes disabled in the course of his / her employment with the Bank, he / she is encouraged to tell the Bank about his / her condition. This is to enable the Bank to support him / her as much as possible. The employee or worker may also wish to advise his / her manager or Human Resources of any reasonable adjustments to his / her working conditions or the duties of his / her job which he / she considers to be necessary, or which would assist him / her in the performance of his / her duties. The employee or worker's manager or Human Resources may wish to consult with the employee or worker and with his / her medical adviser(s) about possible reasonable adjustments. Careful consideration will be given to any such proposals and they will be accommodated where possible and proportionate to the needs of his / her role. Nevertheless, there may be circumstances where it will not be reasonable for the Bank to accommodate the suggested adjustments and the Bank will ensure that it provides the worker with information as to the basis of its decision not to make any adjustments.

The Bank will encourage the participation of disabled employees or workers to ensure that, wherever possible, its employment practices recognise and meet their needs and will consult disabled employees or workers on action(s) to make sure they develop and use their abilities at work. Further guidance can be obtained on an entirely confidential basis from Human Resources.

4.6 Termination of employment

The Bank will monitor redundancy criteria and procedures to ensure that they are fair and objective and do not unlawfully discriminate.

The Bank will also ensure that disciplinary procedures are carried out fairly and uniformly for all workers, whether they result in the giving of disciplinary warnings, dismissal or other disciplinary action.

4.7 Fixed-term employees and agency / temporary workers

The Bank will monitor its use of fixed-term employees and agency workers, and their conditions of service, to ensure that they are being offered appropriate access to benefits, training, promotion and permanent employment opportunities. The Bank will, where relevant, monitor their progress within the Bank to ensure that they are accessing permanent vacancies.

4.8 Part-time workers

The Bank will monitor the conditions of service of part-time employees and their progression within the Bank to ensure that they are being offered appropriate access to benefits and training and promotion opportunities. The Bank will also ensure requests to alter working hours are dealt with appropriately under its flexible working policy.

4.9 Breaches of the policy

If an employee or worker believes that he / she may have been disadvantaged or harassed on any of the unlawful grounds listed in this policy, he / she is encouraged to raise the matter with Human Resources. Allegations regarding potential breaches of this policy will be treated in confidence and investigated in accordance with grievance policy. Workers who make such allegations in good faith will not be victimised or treated less favourably as a result. False allegations of a breach in this policy which are found to have been made in bad faith will, however, be dealt with under the Bank's disciplinary rules and appeal procedure in the case of employees, and dealt with as a disciplinary matter under the terms of the relevant contract for services in the case of agency workers or contractors.

If, after investigation, an employee or worker is proven to have harassed any other employee or worker on any unlawful ground listed in this policy, or otherwise act in breach of this policy, he / she will be subject to disciplinary action, in the case of employees, and dealt with as a disciplinary matter under the terms of the relevant contract for services in the case of workers. In serious cases, such behaviour may constitute gross misconduct and, as such, may result in summary dismissal or termination of a contract for services in respect of the relevant worker. The Bank will always take a strict approach to serious breaches of this policy.

As this policy applies equally to the Bank's workers' relations with visitors, clients, customers and suppliers, if, after investigation, a worker is proven to have discriminated against or harassed a client or supplier he / she will also be subject to disciplinary action or in the case of employees, and dealt with as a disciplinary matter under the terms of the relevant contract for services in the case of agency workers or contractors.

4.10 Monitoring

The Bank is committed to monitoring the effectiveness of this equal opportunities policy. The Bank will undertake regular reviews into all aspects of its policies, procedures and practices in relation to recruitment, terms and conditions of employment, training, career development, promotion and grievance and discipline to identify any trends or patterns emerging and, if so, to analyse whether or not these are justified. The Bank is committed to identifying and taking all steps necessary to eliminate any unjustified discrimination, which is revealed by this monitoring process.

Note that the equal opportunities policy and complaints procedure set out above does not form part of employees' contracts of employment and may be changed by the Bank in its absolute discretion from time to time.

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