


The Code of Conduct and Its Communication Campaign: A Perfect Match!

SCCE - 7th Annual Compliance and Ethics Institute

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Banking that matters. |  UniCredit

Executive Summary

- How to encourage a culture of "doing the right thing" with the ultimate goal of **protecting the reputation** and **strengthening sustainability and competitiveness of business**
- The **Code of Conduct's effectiveness** greatly depends on its **communication**. No matter how good the document is, it'll be meaningless unless fostered and spread out
- It's fundamental to **live and enjoy the Code of Conduct** through different initiatives: Tone from the Top, brochure publication, posters, dedicated events, videos, gamification, gadgets



Agenda

- Compliance Challenge
- Compliance Culture Framework
- The new Code of Conduct
- The Communication Campaign
- Biography & Contacts

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Kahoot!



nevia

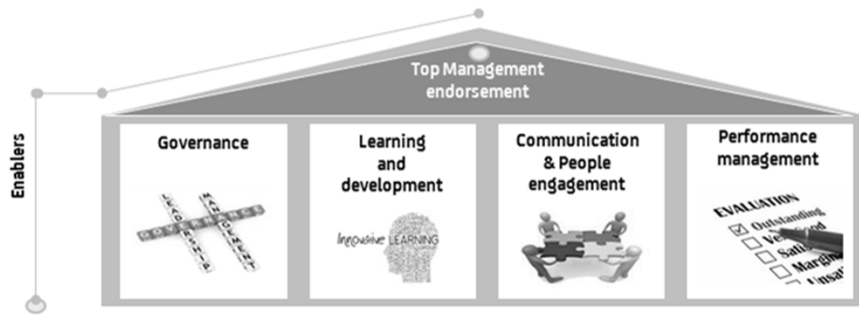
How to Play

- Go to www.kahoot.it
- Enter the **PIN** we will give you in real time
- Answer the 5 questions
- Try to win!

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Compliance Culture in UniCredit is based on a framework built on five key enablers to encourage a culture of “doing the right thing”



The ultimate goal is protecting the reputation and strengthening sustainability and competitiveness of business.

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The new Code of Conduct (1/2)

- The **Code of Conduct** provides guidelines for **proper business decision making and behaviors** to assist employees in everyday situations. It is our responsibility to ensure that our Group adheres to the high professional conduct in compliance with existing rules, regulations, processes and ethical standards
- The **Code of Conduct** aligned to UniCredit's **core principles**
- The **Code of Conduct**, along with its **communication campaign**, is a key element of **Group Strategic Plan**.

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The new Code of Conduct (2/2)

POLICY

- It defines the standards of professional conduct



BROCHURE

- More understandable and attractive



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The Code of Conduct - Concept



- Each employee is called to do the **right thing**
- With the **right tools** – like a compass – the employee can take the **right direction**
- The **Code of Conduct** is the compass allowing each employee to take the **right decision making the difference**

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The Code of Conduct - Brochure



Published and translated
into 11 languages



The aim of the brochure is:

- to **attract** the employees in order to **acknowledge** the contents of the Code of Conduct
- provide them with a **more understandable and friendly content**
- be a fundamental tool to **make the right choice** in the day-to-day activity

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UniCredit is highly committed on a compliance culture program which starts with *Tone from the Top* and our new Code of Conduct

As **compliance culture** sits at the heart of the Group's corporate culture, a **Group wide program**, starting with an **updated Code of Conduct** and supported by a robust **Top management endorsement**, is being executed to address people's behaviors



*"The corporate culture is absolutely fundamental in a bank ... To a certain extent, it is the **Guardian Angel** which is behind each employee to make sure that everybody does the right thing. You know that banks are heavily regulated and we **cannot have a control person or a policeman behind every employee**. But we can have a guardian angel, which is the **culture**"*

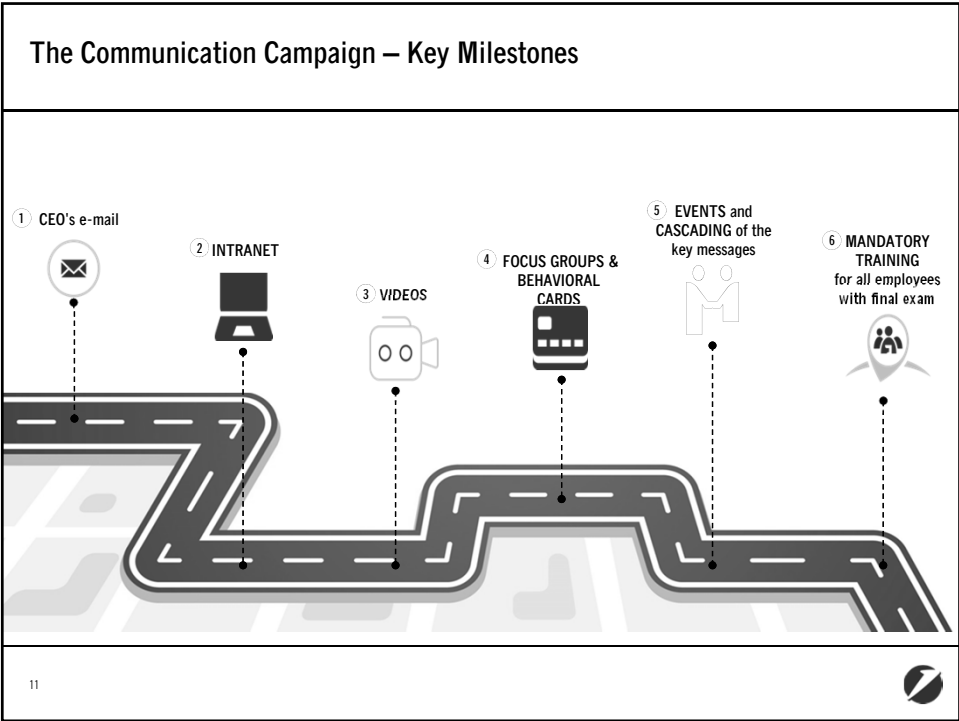


*"**Business** is at the core of what we do, **Compliance** is how we have chosen to do it. It goes beyond the controls and internal procedures. It is an attitude, a commitment toward all our stakeholders, in line with Group values. **Compliance is a pre-requisite for the business** legitimacy and its long term sustainability"*

The individual accountability is the key enabler for an effective spreading and strengthening of risk and compliance culture across the Group

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CEO's e- mail to all employees to announce the new Code of Conduct

1 - 2 - 3 - 4 - 5 - 6

You forwarded this message on 23/05/2017 10:13.

From: UNICredit - AG - Jean Pierre Mustier
To: Sanjin Benic (JHCreD)
Cc:
Subject: Codice di Condotta di Gruppo/ Group Code of Conduct

Dear Colleagues,

Starting from today the new Group Code of Conduct, is available for you all. From experience I know this does not make for the most exciting reading but it is absolutely key that you read it and take in the very important information it contains – think Execution & Discipline.

The Code of Conduct is there to ensure we all behave appropriately with respect to colleagues, clients and other third parties in our daily activities. The principles enshrined in this Code underscore the ethical and legal standards to which we must adhere in order to run our business successfully.

Enhanced risk discipline is a key element of our "Transform 2019" plan. As a coherent system of values and behaviours, a risk culture shapes, drives and assesses the relative risks of every decision made at every level of the organization. Our Group has zero tolerance for any misconduct, or for ignorance of what proper conduct consists of.

This is the basis for retaining the trust of our clients. To do well we must do good. Maintaining a sound reputation, based on trust, is key for our business. It helps build strong relationships and supports the achievement of our long-term business goals. Our credibility and trustworthiness are, with our employees, our greatest assets.

By strictly adhering to the Code of Conduct and to all applicable laws, rules and regulations, globally and locally, our Group earns its place as an integral and respected part of the community. In this way, we continue to develop a successful and sustainable enterprise.

For all of the reasons above, we expect everyone to behave ethically and to always be compliant with the internal and external rules that apply to each and every role throughout the Group.

Our Five Fundamentals already underpin our daily behaviours and should provide all of us with a clear understanding of how we do our jobs. Our new Code of Conduct goes hand in hand with these principles, offering a guide to how to do the right things, in the right way.

Starting from today, I invite all of you to become acquainted with and embody the spirit of our Code of Conduct, the key elements of which are set out in the document linked below. Although no written set of rules can be unilaterally applied to every single situation that could arise, the principles of the Code highlight the culture of compliance we must develop and safeguard throughout our Group.

I know I can count on you all to behave in the right manner at all times.

Best regards,
Jean Pierre Mustier

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Walkthrough (Compliance Manual)

1-2-3-4-5-6

A digital and Interactive Compliance Manual to on-board new employees

