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

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

Kahoot!

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!
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.

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.
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
The Code of Conduct - Brochure

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

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" - J.P. Mustier

"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" - C. Appetiti

The individual accountability is the key enabler for an effective spreading and strengthening of risk and compliance culture across the Group.
The Communication Campaign – Key Milestones

1. CEO’s e-mail
2. INTRANET
3. FOCUS GROUPS & BEHAVIORAL CARDS
4. VIDEOS
5. EVENTS and CASCADING of the key messages
6. MANDATORY TRAINING for all employees with final exam

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

From: Name (Name)
To: Name (Name)
Subject: Notice of availability of the new 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 I truly believe that you need it and love the very important information it contains—think execution and 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 2020” plan. As a coherent system of values and behaviors, a code shapes, shows, 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 common business goals. Our integrity and transparency are, with our employees, our greatest assets.

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

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

Our Code of Conduct is not a set of rules, but a set of principles. They are designed to help us think more clearly about ethical decisions. They provide guidance on how to act, and give direction to our daily activities.

Starting from today, I invite all of you to become acquainted with and embrace the spirit of our Code of Conduct, the key elements of which are set out in the document below. Although it contains set of rules can be unambiguously applied to every single situation that can arise, the principles of the Code highlight the culture of compliance we must develop and safeguard throughout our Group.

I hope you will find it as useful and supportive as I do.

Best regards,

Jean Pierre Mustar
Group Intranet

A dedicated session on the Group Intranet available in 3 languages (IT, EN, GER)

Local Intranet

A dedicated session on the Local Intranet of all 18 Legal Entities
Walkthrough (Compliance Manual)

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