

POSTE ITALIANE GROUP POLICY ON COMMUNITY INITIATIVES

Approved by the Board of Directors on 28 February 2019



The commitment of Poste Italiane Group to support communities

The widespread presence of Poste Italiane Group throughout the country, its service mission and the historical proximity to the local communities in which it operates characterise the Company as a core player in promoting the socio-economic development of the country and the well-being of local communities. For these reasons, Poste Italiane is committed on a daily basis to guide local communities in their modernisation and digitalisation processes and to contributing to their economic and social progress.

In allignment with the contents of the Code of Ethics, of the Integrated Group Policy on corruption and of the Human Rights Policy, the Company contributes to satisfying the needs of the socio-economic context in which it operates and of the community of reference both through typical business activities, characterised by the offering of highly inclusive products and services, and through specific initiatives of social utility and solidarity capable of having a positive impact and bringing benefits to communities both through its widespread network of post offices or through the involvement of corporate volunteers and/or the support of specific projects of community benefits through donations and sponsorships. These initiatives pay attention to all those categories of vulnerable people who live in situations of hardship because of their physical, mental, family, economic, ethnic and social conditions.

Relations with communities are indeed a pillar of the inclusive approach adopted by the Company in the belief that looking at the needs and priorities of communities allows it to meet the social needs expressed directly through its business model. Poste Italiane believes that listening, dialogue and active participation of citizens are the foundations for building a relationship that leads along a path of value creation and sharing with local communities, with a view to ensuring continuity and reconciliation of related and legitimate interests. For this reason, the Company has adopted a structured process of stakeholder engagement that enables a continuous dialogue with all its partners and with those subjects who are influenced by its activities and whose contribution makes it possible to achieve the Company's objective of creating value in the long term.

A fundamental part of this process is the constant dialogue undertaken by the Company with institutions and associations in the third sector, aimed at finding shared solutions in the interest of the community, both at local and national level in a continuous circular process that systematically values a grassroots approach. These activities are reflected in the implementation of specific memorandum of understanding with institutions and local authorities in order to build a system around the social and environmental development initiatives promoted by the Company and connect them in an integrated and coherent manner with the relevant policies implemented by institutional decision-makers.

General principles

In accordance with its commitment in the social field to support communities, the search for shared value for the Company and its stakeholders is an opportunity for Poste Italiane to combine competitiveness with the creation of social value in the long term. Therefore, local needs are linked to the company's objectives to the point of identifying those projects and initiatives that respond to shared interests, mobilising its staff, capabilities and resources to generate a concrete and measurable impact on the community.

The projects and activities are undertaken on a voluntary basis and are selected by the Group with the aim of responding effectively to the needs mostly felt by the community, taking into account the objectives of the major international and national public and private institutions that contribute to the determination of sector policies. Therefore, the community support strategy consists of three main areas of action:

- **Accessibility and inclusion:** Poste Italiane is committed to providing its products and services to different groups of people and to reach, also through the territoriality and widespread nature of the network, those communities and categories of people that may not have direct access to them, also as a result of specific personal or physical conditions. This such commitment is translated in the development of products that can create economic value for the Company and at the same time respond to the social needs expressed by the people living in inland or peripheral areas or areas otherwise subject to situations of disadvantage or social and economic deprivation.
- **Culture and education:** Poste Italiane supports in a structured way initiatives and projects implemented throughout the country to disseminate cultural values and protect its historical identity, promoting the right to education for all, starting with young people with different tools and methods, for instance, by offering scholarships, organising training courses and providing freely accessible content, also with a view to digital inclusiveness.
- **Economic sustainability and social connection:** Pursuant to the principles of subsidiarity and integrated sustainability, collaborates on an ongoing basis with central and local administrations, the Third Sector and local communities to address and take charge of, in close connection and coherence with the planning of the relevant stakeholders, the social needs arising from forms of disadvantage or situations of vulnerability, including those related to natural disasters, making available its network of corporate volunteers, economic tools, technologies and resources in order to ease the recovery to communities.

By pursuing these three priorities, Poste Italiane is committed to contributing concretely also to the achievement of specific Sustainable Development Goals (SDGs) contained in the Global Agenda for Sustainable Development approved by the United Nations, among which those of greatest import once for the Group are:

- *End poverty in all its forms everywhere (SDG 1);*
- *Ensure inclusive and equitable quality education and promote lifelong learning opportunities for all (SDG 4);*
- *Promote sustained, inclusive and sustainable economic growth, full and productive employment and decent work for all (SDG 8);*
- *Reduce inequality within and among countries (SDG 10).*

Management and monitoring

In line with the Group's reference values, investments in favour of communities are made with integrity and transparency, according to formalised procedures aimed at ensuring the effectiveness of the initiatives supported, avoiding any potential conflict of interest.

The activities must be carried out in compliance with current laws, the principles and rules of conduct set out in the Company's Code of Ethics and other corporate regulatory instruments, as well as the control principles provided for in the current Compliance Programme that the Company has adopted pursuant to Legislative Decree no. 231/2001.

First, the parties involved in any way in the process of purchasing goods and/or services on behalf of Poste Italiane S.p.A. act in accordance with the principles of fairness, economy, transparency and proportionality. In choosing its suppliers, Poste Italiane follows objective and documentable criteria,

adopts behaviours aimed at achieving the maximum advantage for the Company, ensuring and guaranteeing loyalty, impartiality, transparency and equal opportunities for collaboration to all suppliers. In their relations with counterparts, the persons involved in community support activities behave according to the highest levels of ethical conduct, in compliance with the Code of Ethics, avoiding making decisions and carrying out activities that conflict, even potentially, with the interests of the Company or in any case with their official duties.

Secondly, the Functions involved in the activities ensure, each within their remit and also through the information systems used, the traceability of data and information and provide for the storage and archiving of the documentation produced, in paper and/or electronically, in order to allow the reconstruction of the various phases of the process itself. In addition, individual activities must be carried out by ensuring the separation of tasks and responsibilities in order to avoid incompatible activities being concentrated under common responsibilities.

In this regard, before launching initiatives and projects that can bring benefits to communities, the Company performs a due diligence process with the aim of establishing the feasibility of granting contributions to support a community. This process includes screening criteria for project proposals determined based on the relevance of the initiatives, the reputation and accountability of the potential partner and consistency with company objectives and expected benefits. Subsequently, the consistency of the initiatives supported with the contractual provisions is periodically assessed, the regular performance of activities is verified and the correct execution of the contractual obligations by the beneficiary is ascertained.

As required by the Code of Ethics, in order to identify anomalous or alleged unlawful cases involving its community initiatives, Poste Italiane makes available systems suitable for receiving reports from stakeholders on the dedicated pages of the Group's institutional websites, always protecting whistleblowers in line with current legislation. The management of reports is entrusted to an Ethics Committee which, having verified whether these are relevant and based on specific facts, submits such cases to the attention of the competent corporate function or bodies, which assess whether to take legal action or adopt measures in accordance with the provisions of the law and with contracts provided for. Finally, through its stakeholder engagement activities, the Company identifies any problems related to community initiatives and identifies solutions in a shared way.

With a view to increasing accountability towards its stakeholders, Poste Italiane is committed to reporting on the objectives, targets and performance of its community initiatives in public company documents made available to stakeholders on the company's website.

In order to monitor performance of its community initiatives, with reference to the classification and measurement standard of the London Benchmarking Group model, Poste Italiane identifies specific performance indicators that can be used to measure the benefits of its business and community initiatives.

Dissemination and updating

This Policy is communicated to all employees and is made available on the corporate website of Poste Italiane to all stakeholders.

With the aim of promoting the continuous improvement of its initiatives for communities, this Policy will be evaluated for updating at least once a year in the light of significant changes linked to the needs of communities, of the main considerations emerging from the dialogue with its stakeholders and of the results of performance measurements relating to its activities.