



COMPLIANCE

Our Compliance department ensures the optimal development, implementation, updating, maintenance and ongoing improvement of the corporate compliance system, particularly:

Occupational safety and health	Protection of personal data	Administrative liability of the companies
MISSION		
<p>Ensure compliance with the legislation related to health and safety in the workplace, through both consultancies and operational activities, aiming at continuous improvement of the entire management.</p>	<p>Pursuant to the GDPR (European Regulation 679/16) our companies are going:</p> <ul style="list-style-type: none"> • to show they have enforced an overall process of suitable security measures for the protection of personal data; • to show in a positive and proactive way that the data processing carried out is suitable and compliant with the European regulation on privacy. 	<p>Pursuant to Legislative Decree 231/2001 and the regulatory and organizational evolution of the businesses, provide for:</p> <ul style="list-style-type: none"> • correct and timely updating of the Organization, management and control model enforced by the Group's companies; • correct and timely updating of the internal control system; • organisation of corporate training

Occupational safety and health

Due to the pandemic, AC Milan implemented several activities to react to the new context of risk and to comply with the competent authorities' demands.

The need to reduce as much as possible the workers exposed to the virus in the work environment, has led to a maximum extension of smart working, that was already part of the company's daily working schedule, allowing only strictly necessary activities on site and limiting as much as possible external activities.

Working methods and conditions have also been adapted according to the ever-changing regulatory indications. The company, that has always been convinced that prevention is pivotal, provided e-learning training for all workers focused on biological risk with an expert biologist.

Moreover, the company has provided psychological and medical support for its workers and their families, mainly to ease the lockdown period and the new situations that everyone was experiencing.

In addition to the activities related to the unforeseen situation mentioned above and the mandatory ones, the Company complied with last year's commitments and:

- optimized contractors' professional technical verification procedures by implementing a dedicated online platform that also allows systematic monitoring of the activity;
- updated safety procedures integrating them with the management of the emergency situation;
- launched new training courses.

Privacy

By enforcing the GDPR, our companies have welcomed the reversal of the trend with respect to the need to comply above all with the formal obligations required by the previous legislation, thus enforcing customized solutions, fully embracing the **principle of Accountability**.

Therefore, we established an **internal Privacy Committee** formed by Legal, IT, HR and Organization & Compliance depts aimed at implementing the personal data protection system. We implemented procedures aimed at regulating some of the most critical profiles related to the protection of personal data, the management of the data rights of our fans and users in general, any data breaches, and other related business processes. Therefore, with the support of our Data Protection Officer (DPO), we planned and implemented an **active monitoring** that allows us to intervene with improvement actions and training meetings. Let's not forget the active discussions with the DPOs of the Serie A teams to address the subject.

Administrative liability of the companies

The past season was also marked by changes in the organizational structure and regulatory updates and our companies have updated their risk assessment, focusing on new principles of conduct in order to ensure possible adaptation or improvement actions. The activity focused on the updating of the **Organization, Management and Control Model (MOGC)** approved by the Boards of Directors on April 20, 2020 which included the impacts related to:

- fraud crimes in sports competitions, abusive gambling or betting and gambling exercised by means of prohibited equipment (Law May 3, 2019);
- new category of tax offenses (Law no. 157 of 19 December 2019).



★ An ongoing improvement is undoubtedly the objective of the Companies on all issues related to Compliance.

Among the objectives for the next season we foresee:

Occupational safety and health	Protection of personal data	Administrative liability of the companies
MISSION		
<ul style="list-style-type: none"> • Optimization of contractors' technical and professional verification procedures; • Updating DVR, information for workers, suppliers; • Launch of new training courses; • Carrying out all medical tests necessary for the issue or renewal of health permits. 	<p>To ensure:</p> <ul style="list-style-type: none"> • the ongoing monitoring of the planned activities; • the periodic updating or implementation of the required documentation (records of processing activities, information, procedures, assignments, etc.); • ongoing collaboration with our departments to allow projects to be developed according to the principle of privacy by design e by default; • new training courses and staff awareness on privacy issues; • participation in the meetings of the DPOs of Serie A teams with the aim of developing a Code of Conduct pursuant to art. 40 of the GDPR to which it will be optional for companies to join but whose joining would entail significant advantages. 	<p>Following the tax crimes referred to in Legislative Decree 75/2020 (in implementation of the PIF Directive) AC Milan will updating the MOGC to identify the corporate processes at risk, the related sensitive activities, the departments involved, the commission procedures and the controls in place. The enforcement of the of MOGC must be alongside the effective enforcement of procedures and other control points, which emerged in the risk assessments carried out, as well as activating training courses aimed at the recipients of the Models, which illustrate principles and rules. The monitoring activity, carried out by the Supervisory and Control Bodies, will be actively supported by our companies</p>

