



COMPLIANCE

The Compliance department ensures the optimum development, implementation, updating, maintenance and continuous improvement of the corporate compliance system, in particular with reference to:

Workplace safety	Personal Data protection	Administrative liability of the Organisations
MISSION		
<p>To ensure compliance with regulations on health and safety in the workplace, through both consulting and operational activities, aiming at the continuous improvement of the entire management process.</p>	<p>Pursuant to the <i>GDPR</i> (European Regulation 679/16) our companies:</p> <ul style="list-style-type: none"> • have adopted an overall process of appropriate security measures for the protection of personal data, • have proved, in a positive and proactive way, that the data processing activities carried out are appropriate and comply with the European Privacy Regulation. 	<p>Pursuant to Legislative Decree 231/2001 and pursuant to the regulatory and organisational evolution of the companies of the Group, provide for:</p> <ul style="list-style-type: none"> • correct and timely updating of the Organisation, management and control Model adopted by the Group's companies; • correct and timely updating of the internal control system; • organisation of staff's training



Safety at the workplace

The workers' health and that of all people accessing our seats, are priority issues for all our Companies. Once again, this year we have carried out the activities provided for by Legislative Decree 81/08, including **regular meetings, medical tests, inspections by the Prevention and Protection Service and the Competent Doctor, evacuation tests**, etc. The Club's focus on safety has also enabled the strengthening of the Prevention and Protection Service, flanking the R.S.P.P. with a LASER Safety Officer and, most recently, with a Prevention and Protection Service Officer. The workers' training, an ongoing activity, involved both the new workforce and the workers already in the "Group".

Privacy

With the adoption of the GDPR, our Companies have accepted the reversal of the trend towards the need to comply, above all, with formal obligations required by the previous legislation, adopting solutions tailored to our reality, fully embracing the principle of Accountability. In compliance with this principle, **an internal Privacy Committee has been set up with the Legal, IT, HR and Organization & Compliance depts**, that drives, stimulates and coordinates the implementation of the personal data protection system. We also implemented procedures to regulate some of the most critical profiles related to the protection of personal data that govern the management of data rights of our fans and users in general, any violation of the data, and other business-related processes. Therefore, with the support of our Data Protection Officer (DPO) we carried out improvement actions and training meetings. Let's not forget the active participation in the working tables with the DPOs of the Serie A teams to address shared topics.

Administrative liability of the Organisations

Our Companies have now carried out a new risk assessment by interviewing the representatives of all departments. We were therefore able to identify our Sensitive Activities and focus on them to recognize the principles of conduct and controls in place or to be implemented, also through the benchmarks used (legal provisions, doctrinal and jurisprudential guidelines, best practices, etc.), to find possible adjustments or improvements. This activity was developed by updating the Organisation, Management and Control Model approved by the Board of Directors on June 28, 2019. In particular, following the entry into force on May 17, 2019 of the Law of May 3, 2019, the Organisation, Management and Control Model of AC Milan S.p.A. has already included in the list of offences also the new category relevant to fraud in sports competitions, illegal gambling or betting and gambling exercised by means of prohibited devices pursuant to Article 25-quaterdecies of Legislative Decree 231/2001.

SAFETY

	EMPLOYEES		REGISTERED PROS (no football players and external)		TRAINEES	
	trained	to be trained	trained	to be trained	trained	to be trained
General Training	33	12	27	9	11	21
Specific Training	21	25	29	8	3	29
Supervisors' training		1	19	5	----	----
Managers' Training		1	----	----	----	----
Fire-fighting training	11	----				
Total of training hours: 718	256		376		56	

PRIVACY

	EMPLOYEES		REGISTERED PROS (no football players and external)		TRAINEES	
	formati	da formare	formati	da formare	formati	da formare
Privacy Course	143	42	52	44	13	2
Total of training hours: 312	214.5		78		19.5	



OBJECTIVES

- The Club's goal is to continue to improve all topics related to Compliance. Among the objectives of the next season:

Safety at the workplace	Personal Data protection	Administrative liability of the Organisations
OBJECTIVES		
<ul style="list-style-type: none"> Optimisation of the procedures for contractors' professional technical check; Documentary updating (Risk Assessment Document, policies relevant to workers, suppliers) Activation of new training courses; Optimization of a control system (check list, report) to support the Employer; Carrying out all medical examinations necessary for the issue or renewal of health permit. 	<p>To ensure:</p> <ul style="list-style-type: none"> continuous monitoring of activities planned. the regular update or implementation of the planned documentation (records of processing activities, policies, procedures, tasks, etc.) continuous collaboration with the business' depts for the development of the projects pursuant to the principle of privacy by design and by default new training courses and staff awareness re: privacy issues participation in the meetings of the Serie A's DPOs with the aim of developing a Code of Conduct pursuant to Art. 40 of the GDPR. 	<p>Following the new category of offences pursuant to Article 25-quaterdecies of Legislative Decree 231/2001, AC Milan S.p.A. will also update the Organisation, Management and Control Model in order to identify the corporate's processes at risk, the related sensitive activities, the departments involved, the commissioning methods and the controls in place. The adoption of the Organisation, Management and Control Model cannot be separated from its effective application so, among the objectives of all the Companies, there is also the implementation of procedures and other controls, which emerged from the risk assessments carried out, as well as training courses aimed at the recipients of the Model, which illustrate the principles and rules. The monitoring activity, carried out by the Supervisory and Control Bodies, will be actively supported by our Companies.</p>

