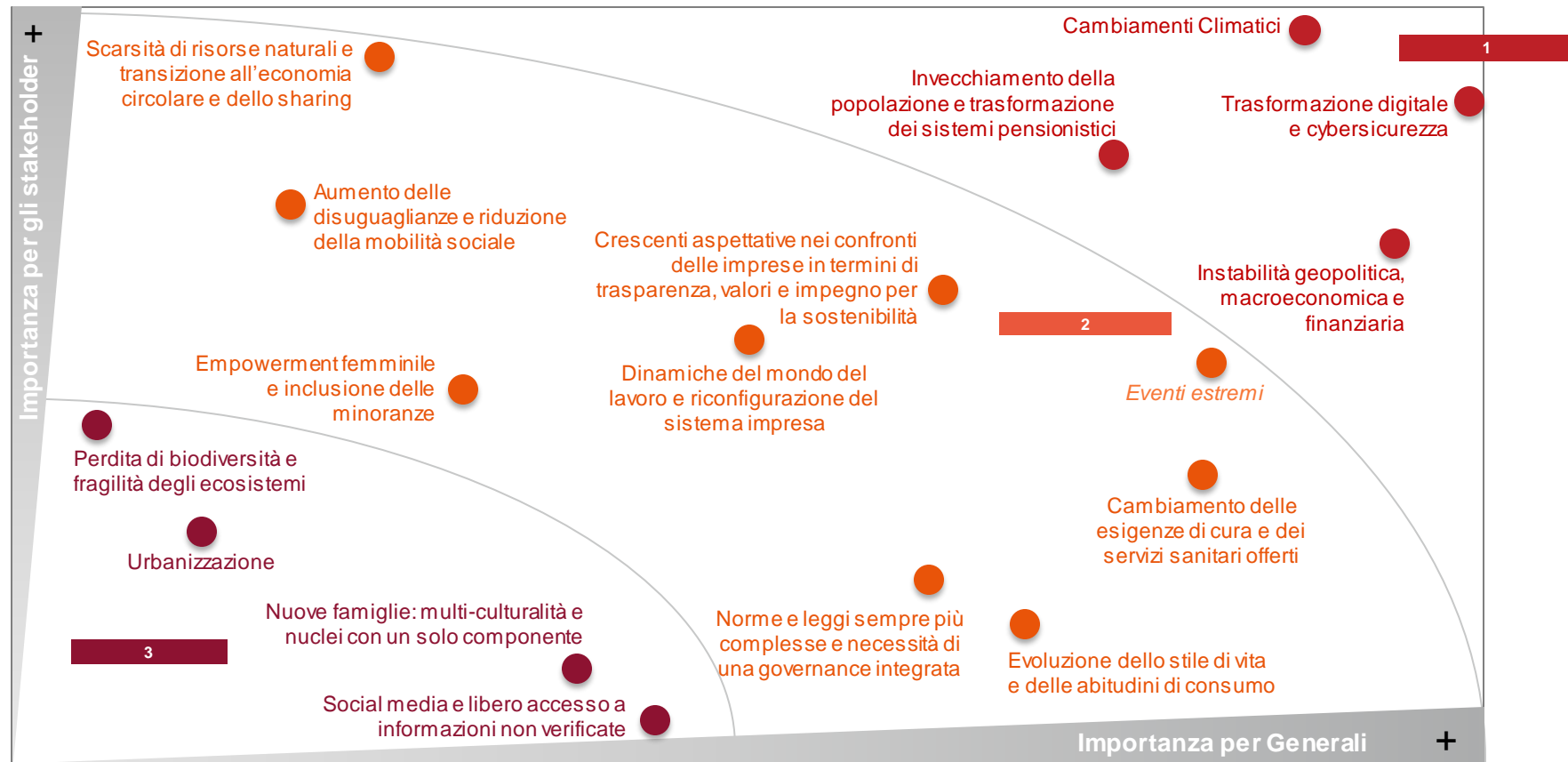


# Sostenibilità e trend Sociali, Ambientali e di Governance (“ESG”) – La Matrice di Materialità di Gruppo



## Trend materiali

## Ambizione

## Responsabilità

1



**Priorità condivise a livello di Gruppo**

Sviluppare una leadership riconosciuta



Collaborazione del Gruppo e guida di GH0

2



**Specifiche priorità di BU/Funzione**

Integrazione nei processi



Iniziative guidate da BU/Funzioni

3



**Nel radar**

Monitoraggio



Tutti



**Europ Assistance Italia S.p.A.**



## **POLICY FOR THE ENVIRONMENT AND CLIMATE**

Chief Sales and Marketing Officer – Brand, Communication and Social Responsibility

### **POLICY**

*Ad esclusivo uso interno*

## Informazioni di sintesi del Documento

<b>Titolo</b>	Policy for Environment and Climate
<b>Classificazione GIRS</b>	Local Policy
<b>Protocollo</b>	EAI_P_09_2018
<b>Approvato da</b>	Consiglio di Amministrazione
<b>Data di efficacia</b>	19-09-2018
<b>Validato da</b>	D. Lgs. 231/01 <input type="checkbox"/> Compliance Officer <input type="checkbox"/>
<b>Funzione Responsabile</b>	CSMO – Brand, Communication and Social Responsibility
<b>Key contact</b>	<a href="mailto:Chiara.giglio@europassistance.it">Chiara.giglio@europassistance.it</a>

## Versione

Versione	Data di emissione	Protocollo	Modifiche	Owner
1	2018-09-19	EAI_P_09_2018		Brand, Communication and Social Responsibility

## Aree/Funzioni interessate

- Brand, Communication and Social Responsibility
- EAI

### **Temi principali**

---

<ul style="list-style-type: none"><li>•</li></ul>	<p>The document reiterates the commitment of Generali in safeguarding the environment, as stated in the Code of Conduct, and includes the guiding principles by which the strategies and goals of Group companies' environmental management must abide, in order to ensure;;;;</p> <ul style="list-style-type: none"><li>• protection of the environment</li><li>• prevention of pollution</li><li>• protection and conservation of biodiversity</li><li>• appropriate response to the challenges posed by climate change.</li></ul>
---	--

### **Principali norme interne correlate**

---

- Code of Conduct
- 

### **Eventuali norme interne abrogate/aggiornate**

---

- N/A

### **Ragioni dell'emissione**

---

<input checked="" type="checkbox"/>	Regolamentare	<input type="checkbox"/>	Altro	
-------------------------------------	---------------	--------------------------	-------	--

<input type="checkbox"/>	Rilevante ai fini D.Lgs. 231/01
--------------------------	---------------------------------

### **Processi aziendali impattati**

---

<ul style="list-style-type: none"><li>•</li><li>•</li></ul>	Corporate Social Responsibility
---	---------------------------------

### **Allegati**

---

N/A

## INTRODUCTION

The Generali Group, international leader in the insurance and financial world, wishes to take up an active role in creating a sustainable future by pursuing a goal of economic development that will lead to continuous improvement both of its business results and of the economic, social and environmental conditions of the communities in which it operates.

The Group's Code of Conduct explicitly calls for economic and social development to be based not only on respect for fundamental human rights and labour rights, but also on environmental protection, to which the Group contributes by promoting the reduction of direct environmental impacts arising from its operating activities and of indirect impacts associated with the value chain.

Generali is aware of the impacts that arise from company activities and of the role the Group can have in the diffusion of virtuous conduct, promoting the culture of sustainability in all its spheres of influence, particularly among employees, clients, suppliers and companies issuing financial instruments.

The Group is also aware that climate change constitutes an environmental, social and economic threat at the global level and that an engagement by all to reduce emissions of greenhouse gases resulting from human activities is necessary.

## AIM AND SCOPE

The Policy for the Environment and Climate identifies the guiding principles by which the strategies and goals of Group companies' environmental management must abide in order to ensure protection of the environment, prevention of pollution and protection and conservation of biodiversity, as well as to meet the challenges posed by climate change.

The goal is to provide a framework for the management of environmental impacts in order to improve the Group's sustainability and take into account risks and opportunities that may have a significant bearing on the development of its core business and its ability to create long-term value. The tool through which the Group manages environmental impacts, giving effect to the Policy, is the Environmental Management System.

The Policy for the Environment and Climate covers all activities carried out by the Group's companies in all the various countries where the Group operates.

## PRINCIPLES

The basic principles of the Policy are inspired by those expressed in the United Nations Global Compact for environmental protection, designed to:

- support a precautionary approach to environmental challenges through systemic management directed at ensuring compliance with regulations and prevention of environmental hazards;
- promote environmental responsibility and greater awareness of environmental issues on the part both of employees and of clients and the public at large, through programmes and initiatives for their active involvement on a path oriented towards continuous improvement and creation of shared value;
- encourage the development and diffusion of environmentally friendly technologies, capable of supporting efficient management of energy and water resources and protection of biodiversity, amounting to effective measures of mitigation and adaptation to climate change.

## MAIN AREAS OF INTERVENTION

In order to make the Policy operational and pursue continuous improvement of environmental performances, so contributing to the fight against climate change caused by greenhouse gas emissions, the Generali Group has identified the following areas of intervention for which specific indicators, and respective targets, have been selected.

### 1. Reduction of its own business's environmental impacts

- Optimization of consumption of natural resources to reduce impacts related to energy, paper and water use, waste production and corporate mobility, also with recourse to utilization of low carbon products and services.
- Periodic monitoring of environmental performances and, in particular, of reduction of greenhouse gas emissions in order to assess the Group's progress on its path oriented towards continuous improvement.
- Raising employees' awareness, through information and specific training programmes that motivate them to become actively involved and the determining of environmental responsibilities.

## 2. Integration of environmental and climate aspects in investment strategies

- Promotion of energy innovation through investments in renewable energy resources and in greater energy-efficiency of buildings, including those held for investment.
- Adoption of responsible investment policies that also include environmental requisites, apt to affect the behavior of issuing companies.

## 3. Promoting and increasing awareness of environmental and climate risks

- Integration of environmental criteria in the risks assessment methodologies to offer insurance and investment products promoting eco-friendly conduct among clients.
- Involvement of the Group's contractual partners so that they too, in their business, commit themselves to safeguarding the environment, respecting the Ethical Code for Suppliers of the Generali Group.
- Fostering a process of cultural innovation in the community geared towards environmental sustainability and the prevention of extreme events and natural disasters.

## 4. Engagement in climate policy

- Support for research to improve the analysis and management of climate change-related risks by means of new actuarial models.
- Dialogue and collaboration with governments and national and international associations to determine and adopt policies and strategies to fight against climate change and increase the resilience of cities and regions, particularly with regard to damage caused by meteorological events of catastrophic import.

## 5. Disclosure and transparency

- Commitment to convey transparently to its stakeholders the strategies and the results achieved in the environmental field, and in the fight against climate change.

## **ADOPTION AND DISSEMINATION**

The Group Policy for the Environment and Climate replaces the previous Environmental Policy of the Generali Group. It has been approved by the Board of Directors of Assicurazioni Generali S.p.A. and adopted by all Group companies. The Group CEO is responsible for its implementation.

In order to ensure its easy accessibility and availability to the public, the Policy for the Environment and Climate is published on the institutional website [www.generali.com](http://www.generali.com) and on that of each Group company.

## INDEX

<b>1</b>	<b>Roles and Responsibilities .....</b>	<b>7</b>
<b>2</b>	<b>Aim.....</b>	<b>8</b>
<b>3</b>	<b>Scope.....</b>	<b>8</b>
<b>4</b>	<b>Refereces.....</b>	<b>8</b>
<b>5</b>	<b>Definitions and Abbreviations.....</b>	<b>8</b>
<b>6</b>	<b>Management Guidelines.....</b>	<b>8</b>
6.1	Drawing up .....	8
6.2	Approval and implementation .....	9
6.3	Communication .....	9
6.4	Local approval and implementation .....	9
6.5	Local communication.....	9
6.6	Monitoring.....	10
6.7	Training.....	10
6.8	Review.....	10

# 1 Roles and Responsibilities

Role	Level	Responsibility
BoD	Group	<ul style="list-style-type: none"> <li>• I approves the Group Policy for the Environment and Climate and any subsequent changes</li> </ul>
RCC	Group	<ul style="list-style-type: none"> <li>• It is responsible for Policy assessment before the approval by th BoD</li> </ul>
Supervisory, Administrative and Management Bodies of Legal Entities		<ul style="list-style-type: none"> <li>• They approve the Policy and any subsequent change at local level</li> </ul>
Group CEO	Group	<ul style="list-style-type: none"> <li>• He submits the Policy to th BoD for approval and is responsible for its implementation</li> </ul>
Local CEOs (CEO of each Group Legal Entity )	Group	<ul style="list-style-type: none"> <li>• They submit the Policy to the Administrative Management and Supervisory Bodies for approval;</li> <li>• They ensure Policy implementation in the individual companies;</li> <li>• They are responsible for distributing the Policy to the individual companies</li> </ul>
EMS Review Committee	Group	<ul style="list-style-type: none"> <li>• It reviews and proposes possible changes to the Policy on an annual basis during the EMS review</li> </ul>
Group EMS Representative	Group	<ul style="list-style-type: none"> <li>• He/she is responsible for defining specific introductory training programs about the policy</li> </ul>
CSR Officer/EMS Representative	Local	<ul style="list-style-type: none"> <li>• He/she support the Local CEO in carrying out all the activities related to the implementation of the Policy;</li> <li>• He/she is responsible for overseeing the approval and implementation process of the Policy.</li> </ul>
Group Communications & Public Affairs	Group	<ul style="list-style-type: none"> <li>• Through the GSR unit, t draws the Group Policy for the Environment and Climate</li> <li>• Through the Group Employees Communication, it support the Functional Governance and Internal Regulations in publishing the Policy on the Group Portal;</li> <li>• Through the Group Media &amp; Web Communications, it publishes the Policy on the Group institutional website</li> </ul>
Functional Governance Group and Internal Regulations	Group	<ul style="list-style-type: none"> <li>• It publishes the Policy on the Portal Group;</li> <li>• It notifies the publication of the Policy to the Country Managers/Regional/Divisional Officers, to the Local CEOs and to the CSR Officers/EMS Representatives;</li> <li>• It ensures that a monitoring process is established</li> </ul>
Group Compliance/Group Audit	Group	<ul style="list-style-type: none"> <li>• It controls the actual implementation if the Policy</li> </ul>
GSR Unit	Group	<ul style="list-style-type: none"> <li>• IT draws up the Policy on behalf of the Group Communications &amp; Public Affairs; It supports the Group Communications &amp; Public Affairs function and the Group EMS Representative in his /her tasks.</li> </ul>



## 2 Aim

The aim of this procedure is to outline the management guidelines of the Group Policy for the Environment and Climate and the relevant responsibilities. The Policy was drawn up to define the guiding principles by which strategies and objectives for the environmental management of the Group companies must abide, with a view to ensuring the environmental protection, pollution prevention, biodiversity protection and conservation and to respond to the challenges posed by the climate change.

## 3 Scope

This procedure refers specifically to the document entitled Group Policy for the Environment and Climate and applies to all the Group companies, which undertake to comply with and act in accordance to its provisions within six months from the approval of the Policy by the relevant Supervisory, administrative and Management Bodies.

## 4 References

The Local CFO is responsible for ensuring that a process for the valuation of assets and liabilities other than technical provisions is established.

The process shall comply with the provisions of this Policy and the Manuals and include, as a minimum, a clear definition of:

- ISO 14001 standard;
- Group Policy for the Environment and Climate;
- Organisational Structure of the Group Environmental Management System

## 5 Definitions and Abbreviations

- Group: Generali Group
- BoD: Board of Directors of Assicurazioni Generali S.p.A.
- RCC: risk and Control Committee of Assicurazioni Generali S.p.A.
- GHO: Group Head Office
- GSR: Group Social Responsibility
- EMA: Environmental Management System
- Policy: Group Policy for the Environment and Climate
- ISO 14001: standard issued by ISO (International Organization for Standardization), which establishes requirements for implementing an Environmental Management System.

## 6 Management Guidelines

### 6.1 DRAWING UP

The Group Policy for the Environment and Climate is a document outlining the guiding principles and areas of intervention to define strategies and objectives, with a view to continuously improving environmental performance and contributing to the fight against climate change caused by greenhouse gases emissions.

Through the GSR unit, the Group Communications & Public Affairs function draws up the Group Policy for the Environment and Climate in compliance with ISO 14001 requirements, in accordance with the priorities and guidelines defined by the BoD. In doing so, it takes the following into account:

- Results of the environmental analysis performed every three years;

- Commitment to continuous improvement of environmental performance, reduction of greenhouse gases emissions and pollution prevention;
- Compliance with legislative and regulatory requirements, and with the principles of initiatives joined by the Group on a voluntary basis;
- The stakeholders 'point of view.

## 6.2 APPROVAL AND IMPLEMENTATION

The Head of Group Communications & Public Affairs function submits the Group Policy for the Environment and Climate to the Group CEO.

The Group CEO submits the Policy to the BoD for approval following an assessment by the RCC, which performs consultative, recommendatory and preparatory functions on social and environmental sustainability issues.

The Group CEO is responsible for Policy implementation, so that its principles can be implemented in the corporate business.

## 6.3 COMMUNICATION

The Group Policy for the Environment and Climate shall be distributed and disclosed inside and outside the Group companies. Disclosure aims at providing knowledge of the principles and commitments undertaken by the Group in the environmental field.

To this end, after approval by the BoD, the Functional Governance and Internal Regulations, supported by the Group Employee Communication function, shall publish the Policy on the Group portal (We Generali Portal), which is the official communication tool used inside the Group, as well as, on the Group institutional website [www.generali.com](http://www.generali.com) under the "Sustainability" section, through the Group Media & Web Communications function, so as to provide communication outside.

Following the publication on We Generali Portal, Functional Governance and Internal Regulations function notifies the publication of the Policy to the Country Managers/Regional/Divisional Officers (hereinafter Head of Business Unit), to the Local CEOs and to the Head of the relevant functions at a Country level (CSR Officers/EMS Representatives).

## 6.4 LOCAL APPROVAL AND IMPLEMENTATION

The Group Communications & Public Affairs function is in charge of boosting the implementation of the Group Policy for the Environment and Climate at a local level.

Each Business Unit lists the Legal Entities within the scope of the Policy controls its effective transposition and forwards the abovementioned list to GSR unit of the Group Communications & Public Affairs function.

The publication of the Policy within the Group Portal gives rise to the obligation for the Local CEOs of the Legal Entities to submit them for approval to the relevant Supervisory, Administrative and Management bodies and to guarantee its implementation. The approval process shall take into consideration any waiver that may be introduced.

CRS Officers or EMS Representatives shall support the Local CEO in carrying out all the activities related to the implementation of the Policy.

Local CEOs Officers/EMS Representatives are responsible for overseeing the overall approval and implementation process of the Policy.

## 6.5 LOCAL COMMUNICATION

In order to ensure easy access to the public, the Local CEOs are responsible for distributing it in the local language and for updating all the relevant documents containing any reference to it, such as the Case of Conduct and the Ethical Code for Suppliers.

The document can be distributed by the Group companies through the following communication channels:

- corporate intranets;
- internet websites
- publication in magazines or periodicals;
- e-mail;
- newsletters;
- press release.

The distribution of the Group Policy for the Environment and Climate among should preferably be done through dedicated portal or in electronic form; moreover, explicit reference to the Policy must be made in supply contracts, to ensure compliance by the supply chain where necessary.

## 6.6 MONITORING

Once approved at a local level, the CSR Officers/EMS Representatives submit a formal acknowledgment to Functional Governance and Internal Regulations, which confirms the approval of the Policy (i.e. Board of Directors resolution, etc..) and its distribution.

Functional Governance and Internal Regulations ensures that a monitoring process is established with reference to:

- the approval of the Policy throughout the Group;
- the updating of the versions of the Policy.

In case of any delay or issue arising, Functional Governance and Internal Regulations alerts the GSR unit in order to boots the implementation is controlled by Group Compliance and Group Audit in line with the respective mandates.

## 6.7 TRAINING

The Group EMS Representative, in collaboration with the competent functions, is responsible for defining specific introductory training programs for the Policy to be understood and implemented by all Group employees.

## 6.8 REVIEW

The Group Policy for the Environment and Climate must be reviewed every year by the EMS Review Committee, i.e. the body tasked with conducting the review of the EMS, in order to assess its suitability, adequacy and effectiveness in view of its continuous improvement.

Following such a review, any changes to the document must be submitted to the BoD for approval, prior to RCC assessment. The document shall be update with the new date and distributed inside and outside the Group.

Chairman of EMS Review Committee  
(Group Director of Communication & Public Affairs)  
Simone Bemporad





**Generali Group**

# SUSTAINABILITY GROUP POLICY

Group Communications & Public Affairs

## GROUP POLICY

*For internal purposes only*

[generali.com](https://www.generali.com)



## Document summary

<b>Title</b>	Sustainability Group Policy
<b>GIRS Classification</b>	Group Policy
<b>Document code</b>	GP_2019_015
<b>Approved by</b>	Board of Directors of Assicurazioni Generali S.p.A.
<b>Effective date</b>	2019-03-22
<b>Group Accountable Function</b>	Group Communications & Public Affairs
<b>Key contact</b>	<a href="mailto:csr@generali.com">csr@generali.com</a>

## Versioning and Ownership

Version	Date of issuance	Document code	Reason for and Extent of Changes	Owner
1	2019-03-13	GP_2019_015	-	Group Communications & Public Affairs

## Main related internal regulatory references

- Generali Group Code of Conduct and main related Group Rules
- Ethical Code for Suppliers of Generali Group
- Charter of Sustainability Commitments
- Group Policy for the Environment and Climate
- Risk Management Group Policy
- Responsible Investment Guideline
- Responsible Underwriting Group Guideline
- Reputational Risk Group Guideline

### Any substituted/abrogated internal regulation

---

- None

### Main related external regulatory references

---

Regulatory

☒

Yes

☐

No

- Regulation 38 of the IVASS of 3 July 2018.

### Annexes

---

- Annex I – List of Key Implementing Requirements

## EXECUTIVE SUMMARY

The Sustainability Group Policy (the “Policy”) sets the framework for the Group to identify, evaluate and manage the risks and opportunities related to Environmental, Social and Governance factors (“ESG factors”) in coherence with its goal to foster the sustainable development of business activities and generate value lasting over time.

In particular, this Policy sets the rules to:

- identify, evaluate and manage ESG factors that may pose risks and opportunities for the achievement of business objectives;
- identify, evaluate and manage the positive and negative impacts that business decisions and activities may have on the external environment and on legitimate interests of stakeholders.

This Policy is aimed at integrating into business processes the Group sustainability model as outlined in the “Charter of Sustainability Commitments”, approved by the Board of Directors of Assicurazioni Generali on the 15<sup>th</sup> March 2017, which states, in line with the principles set out by the Generali Group Code of Conduct and main related Group Rules, the strategic long term goals to run a responsible business and live the community, supporting the creation of a healthy, resilient and sustainable society.

For this purpose, the Policy outlines a process, articulated in three main phases, for which roles and responsibilities are identified.

## INDEX

<b>1. Glossary and Definitions .....</b>	<b>6</b>
<b>2. Introduction .....</b>	<b>8</b>
2.1 Objectives .....	8
2.2 Approval and review .....	8
2.3 Effective date and implementation deadline .....	8
2.4 Scope of application .....	9
2.5 Waivers and dispensations .....	9
2.6 Implementation, monitoring and information flows .....	9
<b>3. Process and main responsibilities .....</b>	<b>10</b>
3.1 Definition of ESG factor .....	10
3.2 Sustainability management process .....	11
3.2.1 Identification and prioritization of relevant ESG factors .....	12
3.2.2 Management of risks and opportunities related to relevant ESG factors .....	13
3.2.3 Monitoring and reporting of risks and opportunities related to relevant ESG factors .....	14
<b>4. Roles and responsibilities .....</b>	<b>15</b>
<b>Annex I – List of Key Implementing Requirements .....</b>	<b>18</b>



# 1. Glossary and Definitions

Acronym	Explanation
<b>AG</b>	Assicurazioni Generali S.p.A.
<b>AG BoD</b>	The Board of Directors of AG
<b>AMSB</b>	Administrative, Management or Supervisory Body
<b>BU or BUSINESS UNIT</b>	Geographical areas and global lines of business, which the Generali Group is organized into according to the latest internal memoranda
<b>BUSINESS OWNER</b>	For the purpose of this Policy the term includes the Group CEO, the General Manager and their direct reports at GHO level, and the equivalent positions at BU and Group Legal Entity level
<b>CNFS</b>	Consolidated Non-Financial Statement. According to the Directive 2014/95/EU and its transposition by the Italian Law with L.D. 254/2016, public interest entities of certain dimensions are required to disclose information on environmental matters, social and employee aspects, respect for human rights, anti-corruption and bribery issues and diversity on the Board of Directors
<b>ESG FACTOR</b>	Environmental Social and Governance factor as described in chapter 3.1 “Definition of ESG factor”
<b>GROUP CEO</b>	Group Chief Executive Officer
<b>GC&amp;PA</b>	Group Communication & Public Affairs
<b>GCFO</b>	Group Chief Financial Officer
<b>GHO</b>	Group Head Office
<b>GROUP</b>	The Generali Group whose ultimate parent Company is Assicurazioni Generali S.p.A.
<b>GROUP LEGAL ENTITY</b>	Any company belonging to the Group and falling within the scope of application of this Group Policy. Any reference to local level shall be intended as to Group Legal Entity level
<b>GROUP MATERIALITY MATRIX</b>	Matrix which pinpoints relevant ESG factors that can significantly influence the Group’s value creation and/or can substantively influence the stakeholders’ assessments of Group’s activities
<b>KEY FUNCTIONS</b>	The Actuarial, the Compliance, the Risk Management and the Audit functions
<b>LCRO/BU CRO /GCRO</b>	Local Chief Risk Officer/BU Chief Risk Officer/Group Chief Risk Officer
<b>LOCAL/BU ACCOUNTABLE FUNCTION</b>	The function that, according to the local organization, is in charge for the implementation, monitoring and reporting of this Policy at local/BU level
<b>LOCAL CEO</b>	CEO of a Group Legal Entity
<b>ORSA</b>	Own Risk and Solvency Assessment as defined in the Risk Management Group Policy

Internal

**SDGs**

The Sustainable Development Goals deriving from the “2030 Agenda for Sustainable Development”, signed by all UN member states in 2015, setting 17 global priorities, 169 associated targets, and 232 indicators, including where possible a baselines and targets

## 2. Introduction

### 2.1 Objectives

Generali, as a responsible Group that aims to create long lasting value over time for its stakeholders, has made public voluntary commitments, including the Global Compact (2007), the Principles for Responsible Investment (2011), the Principles for Sustainable Insurance (2014) and the Paris Pledge for Action (2015), in the belief that this choice falls within its fiduciary duties.

The Group has summarized this level of ambition in its purpose: “To enable people to shape a safer future by caring for their lives and dreams” and has defined a sustainability model in the “Charter of Sustainability Commitments” that is articulated in two pillars:

- **run a sustainable business** focusing on excellence in internal business processes;
- **live the community**, playing an active role where the Group operates, going beyond day-to-day business.

In particular, the Group is committed to ensure that the strategic choices and their execution are guided by the following criteria:

- **multi-stakeholder approach**, aimed at generating value for shareholders, for all those contributing to the realization of the Group’s goals and for those who influence or are influenced by the choices or activities of the Group, including employees, clients, agents and other distributors, contractual partners, the financial community and the wider society, as well as the environment;
- **long term perspective**, generating value in the present without compromising the capabilities to create value in the future;
- **continuous improvement and innovation**, with the ambition of pursuing excellence and sustaining the systematic development of economic, environmental and social performances, and the reputation of the Group.

To ensure the full realization of this sustainability model, this Policy defines the process, the roles and the responsibilities to:

- identify and prioritize the ESG factors relevant for the business activities or on which the Group can significantly impact;
- manage the risks and opportunities related to relevant ESG factors;
- monitor and report the risks and opportunities related to relevant ESG factors.

### 2.2 Approval and review

The Sustainability Group Policy was approved by AG BoD upon proposal of the Group CEO.

It shall be promptly reviewed, and in any case at least once a year, to include developments in legislation, market and/or best practices, Group strategy and organization.

The Group Communications & Public Affairs Director is delegated by the AG BoD to approve Minor Changes<sup>1</sup>.

### 2.3 Effective date and implementation deadline

The Effective Date of the Sustainability Group Policy is 22<sup>nd</sup> March 2019. The implementation deadline of the Policy is 31<sup>st</sup> December 2019 for the Legal Entities (as identified under the following par. 2.4 of this Policy) selected with a risk-based approach

---

<sup>1</sup> As defined in the GIRS Policy

from the Business Units Italy and Global Business Lines, France and Europ Assistance, Germany, Austria, CEE & Russia, Group Investments, Asset & Wealth Management. For the other Legal Entities identified under the following par. 2.4 of this Policy, the implementation of this Policy is expected starting from its first revision.

## 2.4 Scope of application

This Policy applies to:

- i. Assicurazioni Generali S.p.A. and other insurance and reinsurance Group Legal Entities;
- ii. regulated Group Legal Entities other than insurance and reinsurance Group Legal Entities, identified by the Group Communications & Public Affairs Director, after discussion with the Group Business and the Key Functions, taking into account the principle of proportionality and the ESG factor considered;
- iii. other significant Group Legal Entities, identified by the Group Communications & Public Affairs Director, after discussion with the Group Business and the Key Functions, taking into account the principle of proportionality and the ESG factor considered.

Group Legal Entities without employees or active operations are out of the scope of this Policy and, thus, formally excluded from the duty to implement it.

## 2.5 Waivers and dispensations

If a conflict with local laws, regulations or collective labor agreements arises or a proportionality<sup>2</sup> consideration applies, the Local Accountable Function, in agreement with the BU Accountable Function, shall address a Waiver and/or Dispensation request to the Group Communications & Public Affairs Director supporting and explaining the conflict, by writing to: [csr@generali.com](mailto:csr@generali.com) (please use *Annex 1 to the GIRS Group Policy – Waiver and Dispensation Request Template*).

The Group Communications & Public Affairs manages and tracks any Waiver and/or Dispensation requests and provides the Local/BU Accountable Function with the related feedback. The Group Communications & Public Affairs Director reports any significant Waivers and/or Dispensations to the AG BoD.

Local/BU/Group Compliance support a due evaluation of Waivers and/or Dispensations, when they result from conflicts arising from laws and regulations falling into their mandate.

## 2.6 Implementation, monitoring and information flows

The Group Communications & Public Affairs is responsible for overseeing and supporting the implementation and monitoring of the Group Policy across the Group. The Local Accountable Functions are responsible for guaranteeing a due information flow on the approval and implementation status (please refer to *Annex I – List of Key Implementing Requirements*) of the Group Policy within their perimeter of responsibility.

Any relevant organizational unit within any entity in scope shall promptly inform its Actuarial, Internal Audit, Risk Management and Compliance functions (where applicable) of any facts and/or circumstances connected with this Policy which may be relevant for the performance of their duties.

---

<sup>2</sup> Regarding the size, internal organization, nature, scope and complexity of the entity's activities.  
Internal

## 3. Process and main responsibilities

### 3.1 Definition of ESG factor

An ESG factor is defined as any environmental, social and governance aspect that can have an impact on the achievement of the Group's strategic goals and on its own system of governance or that the Group conversely can influence with its activities or choices.

It is acknowledged that the width of phenomena, trends and events that fall within this definition does not allow for definitive list of ESG factors and therefore it is not possible, nor appropriate, to define a complete or final one. Any such list would inevitably be incomplete and would be continuously revised to take into account the evolution of the context in which the Group operates and the changing legitimate interests of its stakeholders. Nonetheless, the table below provides guidance examples of ESG factors from the Reporting Framework of Principles for Responsible Investing of United Nations and from the Italian Legislative Decree no. 254/2016:

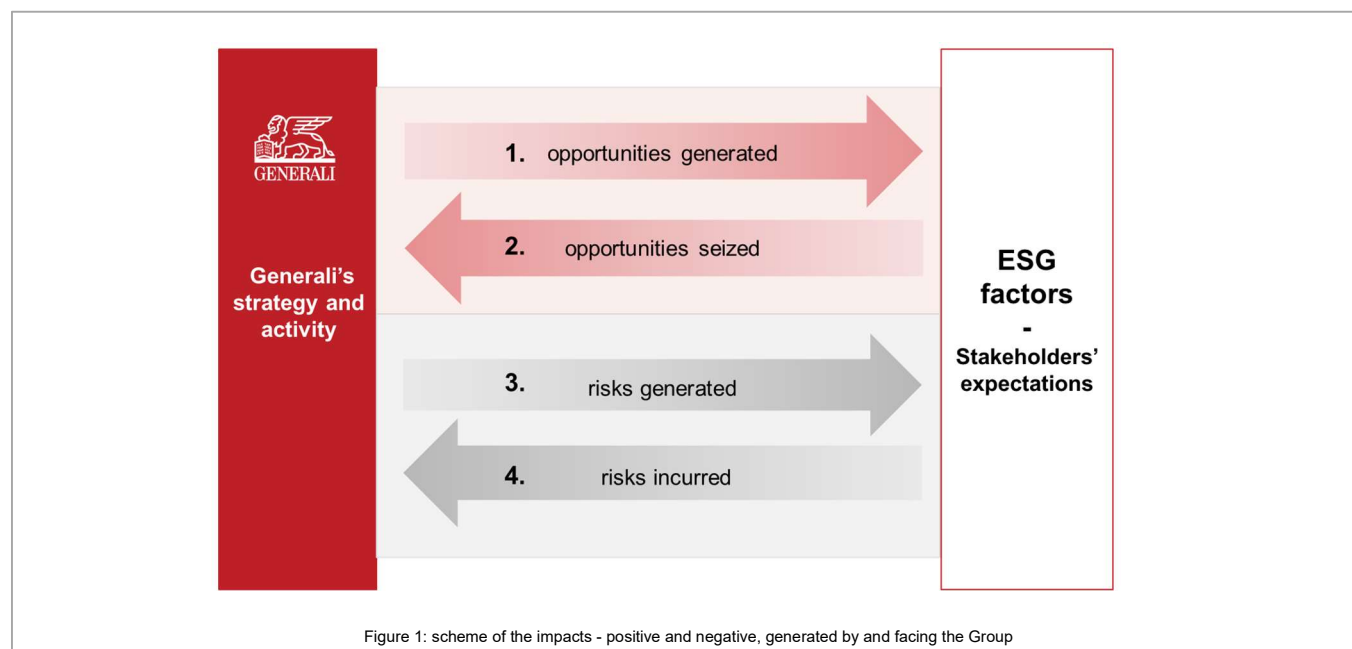
Category of the factor	Example of factor
E – Environmental	Aspects related to the quality and to the functioning of the environment and natural systems, including: greenhouse effect and climate change; the availability of natural resources, including energy and water; changes in the use of soil and urbanization; quality of the air, water and soil; the production and management of waste; the protection of natural habitats and biodiversity.
S – Social	Aspects related to the rights, well-being and legitimate interests of people and local communities, including: human rights, diversity and promotion of equal opportunities; demographical changes; occupation and the right to decent working conditions, including child and forced labor, as well as occupational health and safety; the distribution of wealth and inequalities within and among countries; migrations; education and human capital development; digital transformation, artificial intelligence, internet of things and robotics; health and access to social assistance and healthcare; consumer safety; power diffusion and the crisis of traditional elites.
G – Governance	Aspects related to government of the companies and organizations, including: transparency; ethics and integrity in business practices and compliance with laws; corruption; tax responsibility; board structure, independence and diversity; mechanisms to incentivize the management; shareholders and stakeholders rights, protection/distortion of competition.

The ESG factors shall be evaluated taking into account:

- **desirability of the impacts**, to distinguish the positive impacts that generate opportunities from the negative impacts generating risks;
- **direction of their impacts**, to distinguish the impacts generated from the Group from those that the Group has to face.

Internal

The effective management of the impacts related to ESG factors within business model of the relevant Group Legal Entity requires proper consideration of both opportunities and risks, faced and generated by the Group Legal Entity, as illustrated in the figure below:



ESG factor-related risks incurred by the Group typically do not constitute an autonomous risk category, since such risks tend to be linked to the current risk categories identified by the Group Risks Map as provided for by the Risk Management Group Policy. Nonetheless, it is important to consider that risks related to ESG factors require to take into account the impacts on a “medium-long” term perspective.

To this end, some risks related to ESG factors may be considered emerging risks, while others could be already “emerged” through risk categories such as the financial, credit, insurance, operational, strategic and reputational ones. The management of risks deriving from ESG factors is therefore an integral part of the overall Group risk management process, as already defined in Risk Management Group Policy without prejudice to the need to refer to a longer time horizon for the appropriate assessment of some risks related to ESG factors.

### 3.2 Sustainability management process

The process described by this Policy is composed of the three following phases:

- identification and prioritization of relevant ESG factors;
- management of risks and opportunities related to relevant ESG factors;
- monitoring and reporting of risks and opportunities related to relevant ESG factors.

### 3.2.1 Identification and prioritization of relevant ESG factors

This phase is aimed at identifying and prioritizing ESG factors that could determine risks or opportunities, as defined in the scheme in chapter 3.1. It is carried out by GC&PA, supported by the GCRO as regards the risks.

This phase presents a considerable complexity since it requires the integrated consideration of a vast repertoire of continuously evolving factors, with impacts on the Group's activities that are not always immediately identifiable and easily measurable, especially in the short term.

The identification and prioritization of ESG factors takes into consideration a broad set of internal and external sources and relevant documentation, such as:

- the Group strategic plan and other pertinent documents relating to the strategic objectives of the Group, approved by AG BoD, including the Charter of Sustainability Commitments;
- the results of the risk assessment process aimed at drafting the ORSA report;
- the results of internal and external audit concerning ESG factors;
- the reporting on alleged breaches of the Generali Group Code of Conduct gathered through whistleblowing mechanisms;
- stakeholders' engagement activities;
- shareholders', ESG rating agencies', ESG analysts', proxy advisors' and investors' requests, including disclosure requirements of international accountability standards;
- public analysis documents on megatrends and on the achievement of the SDGs drafted inter alia by governments and international organizations, industrial associations, think-tanks, consulting firms, forums and multi-stakeholders' initiatives in which the Group participates, including - among others - the World Economic Forum, the CRO Forum and the Geneva Association;
- media and web monitoring;
- benchmarking activities with companies active in the same business areas as the Group.

The output of this phase is the Group Materiality Matrix, which pinpoints relevant ESG factors that can significantly influence the Group's value creation and/or can substantively influence the stakeholders' assessments of Group's activities.

GC&PA, with the support of GCRO, defines the preliminary Group Materiality Matrix and involves Group Business Owners and the Local/BU Accountable function to further elaborate the identification and prioritization of the ESG factors. The Local/BU Accountable function, supported by LCRO/BU CRO, involves the relevant Local Business Owners for local adaptation and integration of the Group Materiality Matrix and informs GC&PA of the outcome of this activity.

In light of the outcome of the assessment conducted at GHO and local level, GC&PA, with the support of GCRO, reviews the preliminary Group Materiality Matrix and identifies a selection of the most relevant ESG factors to be analyzed in phase 3.2.2 et seq. of this Policy.

The revised Group Materiality Matrix and the selection of the relevant ESG factors is presented by GC&PA to AG BoD through the Group CEO, after obtaining the opinion of the Group Management Committee.

Internal

The Group Materiality Matrix is updated at least every three years, while the analysis of the selection of the relevant ESG factors as per chapter 3.2.2 et seq. is performed annually, starting from the most relevant ones and envisioning a gradual extension from year to year or on an *ad-hoc basis* in case of changes that may substantially influence the urgency with which one or more ESG factors should be analyzed, also in relation to changes in the Group's strategy, business objectives or risk profile.

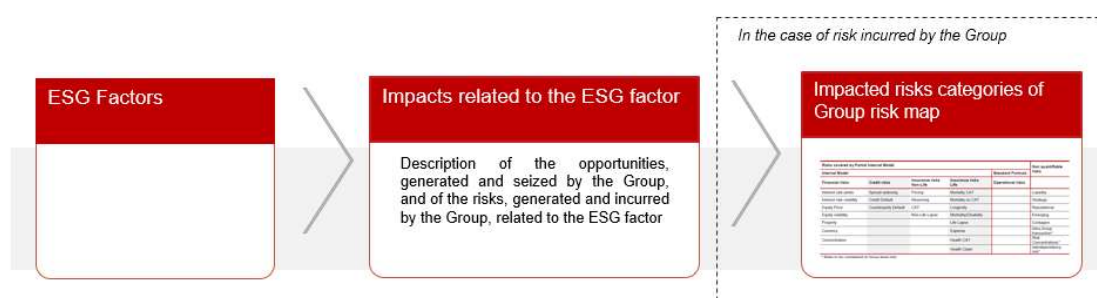
It is recognized<sup>3</sup> that climate change represents an ESG factor with relevant, pervasive and cross-cutting implications for the achievement of the Group's objectives and for the fulfillment of legitimate interest of the stakeholders, therefore it is considered a permanent component of this selection.

### 3.2.2 Management of risks and opportunities related to relevant ESG factors

This phase is aimed at managing risks and opportunities related to relevant ESG factors. It is carried out by Group and Local Business Owners with the support of GCRO and GC&PA and their local counterparts (namely the LCRO/BU CRO for GCRO and Local/BU Accountable function for GC&PA).

The Group Business Owners, according to the activities for which they are accountable, are responsible for:

- identifying the impacts of the relevant ESG factors, with reference to the risks generated and incurred – linking them to the risk categories in the Group Risk Map – and to the opportunities generated or seized; in the case of uncertainty in the identification of the impacts generated by the Group's activities, these can be derived considering their effects on the Group's reputation;



- prioritizing the impacts according to their relevance;
- assessing – regarding the impacts considered relevant – if responsibilities are clearly assigned and a proper management system is defined, verifying the adequacy of the measures in place and adopting possible adjustments or integrations. These measures can include control mechanisms, training and allocation of responsibilities, which must be designed taking into account the relevance of the impacts and the operational environment. Such measures should be embedded into each relevant business, and support processes.

GC&PA supports the Group Business Owners in the identification of opportunities related to ESG factors. GCRO supports, together with GC&PA, the Group Business Owners in the identification of risks related to ESG factors and in the assessment of the suitability and effectiveness of the measures in place for their management.

<sup>3</sup> As at the date of issuing this Policy, EIOPA - in the Consultation Paper on Technical Advice on the integration of sustainability risks and factors in the delegated acts under Solvency II and IDD - acknowledges that currently the assessment of environmental factors, in particular climate change, is most advanced in theory and practice, highlighting that "it has become clear, over the past years, that sustainability risks and in particular climate-change risks will affect insurance and reinsurance undertakings."



The output of this activity conducted at GHO level is shared by GC&PA and GCRO with their local counterparts, which involve the relevant Local Business Owners for local adaptation and integration. At local level, the assessment of the impacts related to the ESG factors is reviewed and the measures in place for their management are mapped. The Local/BU Accountable function and the LCRO/BU CRO inform the local AMSB, the GC&PA and GCRO on the results of this assessment.

In light of the outcomes of these assessments conducted at GHO and local level, GCRO and GC&PA review the preliminary Group mapping of the relevant impacts related to ESG factors and the measures in place for their management. GCRO and GC&PA through the Group CEO inform the AG BoD accordingly.

### **3.2.3 Monitoring and reporting of risks and opportunities related to relevant ESG factors**

In this phase the Business Owners identify the sets of necessary information, the tools for obtaining them, the communication channels, the responsibilities and the escalation mechanisms which must be in place to monitor the effectiveness of the system outlined for managing the risks and opportunities related to the relevant ESG factors and to provide timely, accurate and reliable communication to internal stakeholders.

In the monitoring of the risks and opportunities related to relevant ESG factors the Business Owners are supported at Group level by GC&PA and GCRO, at local level by the Local/BU Accountable function and the LCRO/BU CRO.

The Business Owners are also responsible for contributing to the external disclosure on risks and opportunities related to ESG factors, as well as on how they are managed and the consequent outcomes, which complies with regulatory obligations, without prejudice to any confidentiality constraints or specific legal prohibitions. The Group recognizes the benefits, including reputational, deriving from the choice of giving public disclosure of these aspects as a lever to strengthen transparency, build trust, support the decision-making process of the interested parties and demonstrate the Group's capacity to create long lasting value.

The results concerning risks related to relevant ESG factors are reported within the ORSA Report, following the process and governance already defined in the Risk Management Group Policy. GC&PA reports to the AG BoD through the Group CEO on the progress achieved in generating and seizing relevant opportunities related to ESG factors.

GCFO, in compliance with legislative requirements<sup>4</sup>, is accountable for the external disclosure of Non-Financial Data and Information through the CNFS and the Business Owners are responsible for guaranteeing the quality of the disclosure in terms of accuracy, completeness, appropriateness, integrity and traceability of the data and information under their remit.

---

<sup>4</sup> According to the Directive 2014/95/EU and its transposition by the Italian Law with L.D. 254/2016 public interest entities are required to disclose information on environmental matters, social and employee aspects, respect for human rights, anti-corruption and bribery issues and diversity on the Board of Directors.

## 4. Roles and responsibilities

The following chapter summarizes the main roles and responsibilities, in line with the Group Directives on the System of Governance, of the AMSB and of the other functions involved in the process outlined by this Group Policy.

Role	Responsibility
<b>AG BoD</b>	<ul style="list-style-type: none"><li>ensures that the Group organizational and management system is complete, functional and effective in managing the risks and opportunities related to ESG factors;</li><li>approves the list of ESG factors, their prioritization and the selection of those to be included in the assessment, management, monitoring and external reporting phases as envisioned in chapter 3.2.2 et seq.;</li><li>approves the Group ORSA Report, as stated in the Risk Management Group Policy;</li><li>approves the Group Annual Integrated Report including the Consolidated Non-Financial Statement, which discloses the main impacts related to ESG factors, generated and incurred by the Group, as well as how they are managed and the consequent outcomes.</li></ul>
<b>Local AMSB</b>	<ul style="list-style-type: none"><li>ensures that the organization and management system of the pertinent Legal Entity is adequate and effective in identifying, assessing, managing, monitoring and controlling the risks and opportunities related to ESG factors;</li><li>is informed of the assessment of the risks and opportunities related to the relevant ESG factors and of the measures in place for their management; for (re-)insurance Entities the local AMSB is informed through the Local ORSA Report.</li></ul>
<b>Group CEO and Local CEO</b>	<ul style="list-style-type: none"><li>determine and provide the resources needed for the establishment, development, implementation, and continual improvement of the system to manage risks and opportunities related to relevant ESG factors; considering the size, complexity, structure and operations of the Legal Entity in scope. Resources include financial and human ones, as well as access to external advice and specialized skills, organizational infrastructure, and technology;</li><li>ensure, supported by the relevant Human Resource function, that the employees are competent in identifying, evaluating, managing, and monitoring the risks and opportunities related to relevant ESG factors, on the basis of appropriate education, training and/or work experience.</li></ul>
<b>GC&amp;PA</b>	<ul style="list-style-type: none"><li>coordinates, supported by GCRO as regards the risks, the process for drafting the Materiality Matrix, involving the Group Business Owners and the Local/BU Accountable function;</li><li>proposes for approval the Group Materiality Matrix and the selection of ESG factors to be analyzed in phases 3.2.2 et seq. to the AG BoD through the Group CEO after obtaining the opinion of the Group Management Committee;</li></ul>

Internal

	<ul style="list-style-type: none"> <li>• supports the Group Business Owners and the Local/BU Accountable Function in the identification of opportunities related to relevant ESG factors, providing the Group pre-assessment conducted at GHQ;</li> <li>• supports GCRO and the Group Business Owners in the identification of risks related to relevant ESG factors and in the assessment of the suitability and effectiveness of the measures in place for their management and monitoring;</li> <li>• informs the AG BoD through the Group CEO on the main opportunities related to relevant ESG factors, generated or seized by the Group.</li> </ul>
<b>BU/Local Accountable Function</b>	<ul style="list-style-type: none"> <li>• coordinates the Local Business Owners in the process of identification and prioritization of relevant ESG factors, relying on the preliminary Group Materiality Matrix proposed by the GC&amp;PA;</li> <li>• supports, together with LCRO/BU CRO, the Local Business Owners in the assessment of the relevant ESG factors-related risks and opportunities and in the assessment of the effectiveness of the control system in place for their management and monitoring, relying on the preliminary Group assessment and management measures mapping proposed by the GC&amp;PA;</li> <li>• reports, supported by the LCRO/BU CRO, to the local AMSB and the GC&amp;PA on the identification of the relevant risks and opportunities related to the selected ESG factors and in the assessment of the suitability and effectiveness of the measures in place for their management.</li> </ul>
<b>GCRO / BU CRO / LCRO</b>	<ul style="list-style-type: none"> <li>• supports GC&amp;PA in the identification and prioritization of ESG factors also on the basis of the Main Risk Self-Assessment and emerging risk assessment results;</li> <li>• supports, together with GC&amp;PA at Group level, the Business Owners in the identification of risks related to relevant ESG factors and in the assessment of the suitability and effectiveness of the measures in place for their management and monitoring;</li> <li>• GCRO together with GC&amp;PA informs the AG BoD on the risks related to relevant ESG factors and on the measures in place for their management through the ORSA Report; Local CROs inform respective AMSB.</li> </ul>
<b>GCFO</b>	<ul style="list-style-type: none"> <li>• defines a model (framework and governance) to ensure the adequacy of the internal processes aimed at reporting the Non-Financial Data and Information, through the CNFS as envisioned in chapter 3.2.3;</li> <li>• coordinates the process for the reporting of the CNFS.</li> </ul>
<b>Business Owner</b>	<ul style="list-style-type: none"> <li>• is responsible in relation to the activities for which they are accountable, with the support of the GC&amp;PA and the Local/BU Accountable Function, for the identification and prioritization of the ESG factors as envisioned in chapter 3.2.1;</li> </ul>

Internal

- is responsible, supported at Group level by GC&PA and GCRO and at local/BU level by the Local/BU Accountable function and the LCRO/BU CRO, for the identification and prioritization of the risks and opportunities related to ESG factors and for the assessment of the effectiveness of the measures in place for managing the relevant ones, as envisioned in chapter 3.2.2;
- is responsible, supported at Group level by GC&PA and GCRO and at local/BU level by the Local/BU Accountable function and the LCRO/BU CRO, for monitoring the risks and opportunities related to relevant ESG factors, as envisioned in chapter 3.2.3;
- is responsible for the management of the data under their remit and related quality in terms of accuracy, completeness, appropriateness, integrity and traceability and for contributing to their disclosure through the publication of the CNFS as envisioned in chapter 3.2.3.

## Annex I – List of Key Implementing Requirements

The following list outlines the key implementing requirements for the Sustainability Group Policy in order to support its implementation at local level.

This list is not intended to be exhaustive and it does not cover all the implementing requirements of the Sustainability Group Policy which shall be fully implemented by the Group Local Entities in scope, net of approved Waivers or Dispensations.

#	IMPLEMENTING REQUIREMENT	RELATED PARAGRAPH(S)	DEADLINE
1	Has the Local/BU accountable function been identified?	3.2.1	2019-12-31
2	Have the relevant ESG factors been identified?	3.2.1	2019-12-31
3	Are the most relevant risks and opportunities related to ESG factors managed according the provision of this Policy?	3.2.2	2019-12-31
4	Has the AMSB been informed on the risks and opportunities related to the relevant ESG factors and on the measures in place for their management?	3.2.3	2019-12-31