

## The Generali Group Process on Managing Reported Concerns

### 1. Introduction

This document explains the process implemented by the Generali Group to manage concerns reported in accordance with the Generali Group Code of Conduct through the whistleblowing reporting channels.

### 2. Informally Handled Concerns

In the majority of cases reported to direct managers or Human Resources (HR) Function, the reporter will have the expectation that the case will be handled informally by them and not escalated to other departments. Where the manager or the HR function is unable to informally resolve the concern, due to the seriousness, nature or a conflict of interest, the concern must be sent to the competent Compliance Officer<sup>1</sup> for its management.

The violation of applicable legal requirements must be always reported to the competent Compliance Officer.

### 3. Whistleblowing Reporting Channels

The Generali Group provides several alternative to report a concern to the Compliance Function responsible for its management:

- Local Compliance
- Group Compliance
  - by post: Group Compliance - Business Integrity - Via Machiavelli, 3, 34132 Trieste.
- The Generali Group Whistleblowing Helpline
  - by web form or phone numbers in all the countries where Generali operates in via <https://generali.whispli.com/speakup>

### 4. Initial Case Assignment

Once reported, the case will be assessed to identify the competent Compliance Officer for the management of the concern.

The case will be assigned based on the Generali Group internal regulations on handling concerns and this means that cases are normally assigned to the local Compliance Officer, other than in the following cases:

Cases Involving	Assignment of Concern
Local Compliance Officer	Business Unit Compliance Officer
Business Unit Compliance Officer and any local CEO or AMSB member	Group Compliance Officer
The Group CEO, the Group Compliance Officer and any other person to whom the Group Compliance Officer reports	Chairman of the Board of Directors of Assicurazioni Generali

Cases reported via the Generali Group Whistleblowing Helpline are automatically assigned to the competent Compliance Officer, following the above-mentioned rules.

The Business Unit and the Group Compliance Officers may be based in a country, other than where the concern took place; however, any information will be handled in accordance with applicable jurisdictions' regulations.

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<sup>1</sup> The Compliance Group Policy qualifies the Compliance Function as independent from any operational function. The Compliance Officer reports to the Administrative, Management and Supervisory Body (AMSB).

## 5. Details needed to assign the case

When submitting a concern, the Reporter should provide the following information to assist the process for the assignment of the case:

1. The Country(ies) in which the Reporter is located;
2. The Country(ies) in which the reported Breach took place;
3. The Generali Group company(ies) to which the report relates;
4. Whether the case involves the Senior Management and/ or the Compliance Function;
5. Description of the events.

The above information will also assist the identification of cases where local law restricts the use of the reporting channels.

All information provided by the Reporter should be transparent, easy understandable and reliable. This will allow a timely and robust management of the case. For example, information about individual's private life or sensitive data (including health or sex life information) should not be submitted unless it is strictly required or directly relates to the concern.

## 6. Evaluation

A preliminary evaluation will be undertaken to ensure there is the appropriate Compliance Function to handle the case and that the case is sufficiently detailed to enable an investigation.

Once the preliminary evaluation is completed, the Compliance Function will start investigating the case.

The evaluation and investigation of the case will be undertaken with the utmost confidentiality and the relevant information will be shared between the Compliance Function and other persons on a strictly need-to-know basis.

## 7. Remedial Measures

Following the investigation, the Compliance Function will propose the remedial measures that are needed.

Where disciplinary sanctions may be appropriate, the Compliance Function will involve HR Function in the process.

All remedial measures will be submitted to the competent corporate body (e.g., CEO, AMSB) for final decision.

## 8. Whistleblowing Tool

All the reported cases within Generali Group will be recorded on the Whistleblowing Tool, other than those that are handled informally.

The access to the individual cases is defined on a case by case basis, and is limited to the Compliance Function and, where relevant and only on a need-to-know basis, to the persons handling the investigations.

The Whistleblowing Tool is hosted by a third-party provider on servers located within the European Union.

## 9. Reporting

The Whistleblowing Tool allows the production of regular reports at local, regional and group level. The reports are limited to generic details of the cases, including for example the number of cases received grouped by type of allegations involved or country.

The reports do not contain any personal information (for example the names of the individuals involved) about the cases, such as the identity of any of the individuals involved.

## **10. Conclusion of the Case**

Once the case has been concluded, personal information held within the Whistleblowing Tool will be stored and removed in accordance with the applicable internal and external local provisions.

Where it is necessary to complete remedial measures or as required by local regulations, personal data may be maintained by the relevant functions outside the Whistleblowing Tool in accordance with applicable requirements.