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## About Generali Group Whistleblowing Helpline

### What is Generali Group Whistleblowing Helpline?

Generali Group Whistleblowing Helpline is one of the confidential reporting tools assisting Generali Group to address concerns on practices or actions possibly in breach of internal or external regulations, including the Generali Group Code of Conduct.

This Helpline is provided by Whispli (<https://generali.whispli.com/speakup>)

The Helpline accepts reports in the languages of the countries where Generali Group operates.

### Why do we need a system like Generali Group Whistleblowing Helpline?

- By creating open channels of communication, we can promote a positive and fair work environment.
- An effective reporting system will augment our other efforts to foster a culture of integrity and ethical decision-making.
- Research shows that externally managed helpline/webforms are frequently used by employees or third parties and are a very effective way for an organization to detect breaches of regulation and ethical misconducts.

### May I report using either the Internet or the telephone? And what if I don't have access to the Internet?

Yes, you have the ability to submit a confidential report via either the telephone or the Internet.

If you can't reach a computer that can access the Internet or if you are uncomfortable using a computer, you can call the Generali Group Whistleblowing Helpline, which is available 24 hours a day, 365 days a year.

### Can I report anonymously?

You may choose to report in person or anonymously.

However, where anonymous reports are accepted, the Group believes that the investigation of any report will be most effective if the identity of the person submitting the report is known. The Group is committed to protect the identity of the Reporter.

# Reporting – General

## **What type of situations should I report?**

The Generali Group Whistleblowing Helpline system is designed for employees and third parties to report any practice or conduct that you consider, in good faith, as inappropriate or inconsistent with the law, the Code of Conduct or other internal policies.

Reports must be adequately detailed in the description of the circumstance of the concern or of the breach.

## **What should NOT be reported through this channel?**

Do not use this Helpline/Webform to report events presenting an immediate threat to life or property. Reports submitted through this service may not receive an immediate response. If you require emergency assistance, please contact your local authorities.

Request for commercial information or complaints from customers shall not be submitted through this tool if related to the products or services provided to them by Group Companies, since they have to be managed according to specific procedures (please check the company's website or the documentation attached to your contract).

Moreover, reports from Employees shall not be submitted through this tool if related to dissatisfaction with their performance evaluation/ career path unless connected with a breach nor reports shall not be submitted related to aspects of personal life of our Employees which are not connected to the working activities.

## **I am not sure if what I have observed or heard is a breach of internal or external regulations or involves unethical conduct, but it just does not look right to me. What should I do?**

You could ask the Compliance Officer of the company or submit a report through Generali Group Whistleblowing Helpline.

## **If, as an employee, I get aware of a breach, shouldn't I just report it to my manager and let him/her deal with it?**

You could bring any concerns forward to your direct manager or HR function. However, that there may be circumstances when either you are not comfortable reporting the issue in this manner (as for example there is a conflict of interest).

If you are, for any reason, not comfortable to share your concern with your direct manager or the HR function, or if you consider the concern significant or it was not properly managed, you should contact your Compliance Officer or the Group Compliance Function.

The Compliance Officers, as responsible persons of an independent control function, ensure the management of the reports and of related investigations in a professional manner in accordance with the provisions of the internal and external requirements.

It is critical that any relevant information is swiftly submitted to the persons closest to the source of the problem: their investigation and power to remedy are, in most of the cases, more effective and they can investigate and propose to adopt the proper measures timely. This principle is established to foster a culture of good communication and corporate social responsibility.

### **Why should I report what I know? What's in it for me?**

We all have the right to work in a positive environment and with that right comes the responsibility of acting in correct and ethical manner in the workplace as well as in the relationship with our third parties.

Thus, we should have the right and the duty to let the appropriate people know if someone is not acting correctly. Misconducts can threaten the reputation of the Group, endangering our business and our relationship with the stakeholders.

### **Does senior management really want me to report?**

It certainly does. In fact, they *need* you to report. You may have initial knowledge of an activity that may be cause for concern. Your reporting can minimize the potential negative impact on the company, our people and third parties.

### **As an employee, should I worry about the consequences of submitting a report?**

The Group strictly prohibits retaliation against any employee who submits a report in good faith, no matter whom the report involves.

### **What if I remember something important about the incident after I submit the report? Or what if the person in charge with the case has further questions for me concerning my report?**

When you submit a report at the Generali Group Whistleblowing Helpline, you are asked to choose a username and a password to create your Whispli inbox. You can return to your Whispli inbox again and access the original report to add more detail or answer questions posed by the Compliance Officer in charge with the case and add further information that will help resolve open issues. We strongly suggest that you return to the site in the time specified to answer possible questions. If you choose to submit an anonymous report, you can enter into an anonymous communication with the Compliance Officer.

### **What happens if, following the investigation, the concern turns out to be unfounded?**

If unfounded or unjustified, the Compliance Officer dismisses the report informing the Reporter. All documentation related to any report will be retained no longer than necessary.

### **What happens if, following the investigation, the concern turns out to be accurate?**

If the report turns out to be accurate, the Compliance Officer will propose remedial measures to be implemented and evaluate whether disciplinary measures are appropriate considering the law and the internal regulations. The CEO or the appropriate administrative body will take the final decision.

All documentation related to any report will be retained no longer than necessary.

### **What happens if, following the investigation, you are not satisfied with the result?**

If for any reason you are not satisfied with the result of the investigation please contact your Compliance Officer.

Please be aware that if you are in the EU, you can follow up with the national competent authority. In this case please check the website of your Generali Entity for more details.

## **Reporting Security**

### **It is my understanding that any report I send from a company computer generates a server log that shows every web-site that my PC connects with, and won't this log identify me as a report originator?**

Generali Group Whistleblowing Helpline system does not generate or maintain any internal connection logs with IP addresses, so no information linking your PC to Generali Group Whistleblowing Helpline is available. A high-grade AES256 encryption is used to protect your data. Your IP address is deleted every time and is never stored on our servers or logs

The Compliance Function has requested the IT Department not to track any connection to the Generali Group Whistleblowing Helpline made through the internal VPNs. Anyway, if you still feel uncomfortable making a report on your work PC, you have the option of using your personal device outside our work environment (e.g., such as one located at an Internet café, at a friend's house) through the Generali Group Whistleblowing Helpline secure website.

### **I am concerned that the information I provide Generali Group Whistleblowing Helpline will ultimately reveal my identity. How can you assure me that will not happen?**

The Generali Group Whistleblowing Helpline system is designed to protect anonymity (<sup>2</sup>). However, if you wish to remain anonymous, you - as a reporter - can decide not to reveal your identity.

### **Does the telephone Helpline guarantee anonymity too?**

Yes, you will be asked to provide the same information that you would provide in the web form and an interviewer will type your responses into the Generali Group Whistleblowing Helpline website. These reports have the same security measures applied to the web reports.

### **How can I identify myself?**

There is a section in the web form for identifying yourself.

If you call the Helpline, you can disclose your identity to the interviewer.

## **Confidentiality and data protection**

### **Are the reports and data submitted treated confidentially?**

Yes, whichever of the dedicated reporting channels you use, your reports, their possible follow-ups as well as your data and that of the individuals concerned will always be treated **confidentially** and handled with the utmost discretion, in accordance with the Generali Group Data Protection Policy and the applicable data protection legislation.

Please refer to the Generali Group Whistleblowing Privacy Notice (xxx).

### **What information shall I include in the report?**

You should only submit the information that is necessary to undertake an investigation of the concerns raised, for example you should not submit information about an individual's private life or sensitive data (including details of their health or sex life) unless it is strictly required and directly relates to the concern. You should also avoid submitting information about individuals that are not connected to the concern raised.

### **Where do these reports go? Who can access them?**

Reports are entered directly on the third party service provider (Whispli) secure server to prevent any possible breach in security.

The information may only be reviewed and used by individuals who need to access the data to fulfill their job duties, in accordance with The Generali Group Process on Managing Reported Concerns or where required by law. These individuals include Compliance Officers and people from other functions, only if it is needed to properly manage the cases, within Assicurazioni Generali S.p.A. or its controlled Group companies.

The information may be stored by Whispli, Assicurazioni Generali S.p.A., and by Generali Group companies.

In all cases, the report will be handled confidentially and in accordance with the Generali Group requirements, details of which are available on The Generali Group Process on Managing Reported Concerns.

**Will the information be transferred abroad?**

It may be necessary to share the details of the report within the Generali Group and/or its professional advisers located abroad. Where this occurs, it will be always in compliance with the data protection legislation and Assicurazioni Generali S.p.A. and its Group companies will take appropriate steps to ensure the confidentiality of the data.

**Will the details of the report be shared with the individuals named in the report?**

In order to fairly review a concern it is often necessary to inform the accused person, so they can respond to the concerns. All reasonable actions will be taken in order to protect your identity in accordance with any authorization provided and applicable laws.

**How can I have access to the information I provided?**

When you submit a concern, you will be provided with a unique PIN and prompted to enter a password. You can use these details to review and supplement the details of the report.

You can exercise the right of access to your data, or in certain circumstances ask for the data to be modified or erased, by logging into the system or calling the helpline and submitting a request for this. Your request will be passed to the appropriate Compliance Officer of the Generali Group, who will then provide you with the contact details for the person handling your request.