

The Generali Group Process on Managing Reported Concerns

1. Introduction

This document explains the process utilized by the Generali Group to manage concerns reported in accordance with the Group Code of Conduct.

2. Informally Handled Concerns

In the majority of cases reported to managers, the reporter will have the expectation that the case will be handled informally by the manager and not escalated to other departments. Where the manager is unable to informally resolve the concern, because of its seriousness, nature or their lack of impartiality, the concern will be sent to the Compliance Officer¹ for its management.

3. Reporting Channels

The Generali Group provides several alternative reporting channels in addition to local management:

- Local Compliance
- Group Compliance
- The Generali Group Compliance Helpline

4. Restrictions on Reporting – Compliance Helpline

Cases reported via the Generali Group Compliance Helpline are limited to those involving:

Financial Issues	The alteration, fabrication, falsification, or forging all or any part of a financial document, contract or report; the creation of misleading impressions, omission of important facts, or making false claims; inaccurate financial disclosures, insider trading, or questionable practices relating to internal financial controls.
Auditing and Accounting	Any intentional misrepresentation of information, undue influence or independence concerns relating to interactions with external or internal auditors, or the oversight of audit functions of activities. Including questionable practices relating to accounting, auditing or internal financial controls (examples include: tax evasion, misstatement of revenues, misstatement of expenses, misstatement of assets, misapplications of accounting principles, wrongful transactions).

¹ The Group Compliance Policy qualifies the Compliance Function as independent from any operational functions. The Compliance Officer reports to the Board of Directors.

Banking	Concerns regarding questionable or unethical banking practices. (Examples include: money laundering, bank fraud; embezzlement; altering, fabricating, falsifying or forging of any banking document, report or record; or questionable practices relating to regulatory or internal banking controls).
Anti-Bribery	The act of influencing the official or political action of another by corrupt inducements which may include giving items that could be reasonably interpreted as an effort to improperly influence a business relationship or decision.
Top management involved in Financial, Auditing and Accounting, Banking or Anti-Bribery	The above described issues involving any member of the Board of Directors (or equivalent) ² , including the Chief Executive Officer, the Chief Financial Officer, the General Manager, the Head of Human Resources or the Head of Internal Audit

Other concerns should be reported via the alternative channels (see section 3).

Further restrictions may be applied by local law.

5. Initial Case Assignment

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

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

Cases Involving	Assignment of Concern
Company top management	Regional or Group Compliance Officer
Significant accounting, auditing or financial matters	Regional or Group Compliance Officer
Local or Regional Compliance Officer	Group Compliance Officer
Group Compliance Officer	Chairman of the Board of Directors of Assicurazioni Generali

Cases reported via the Generali Group Compliance Helpline are automatically assigned to the appropriate compliance officer, following the above mentioned rules.

The Regional/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 local legislation and the Generali Group policy on Data Protection (please contact the local Privacy Officer for details).

² Including members of Supervisory Board, where applicable

6. 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 in which the reporter is located;
2. The country in which the reported breach took place;
3. The Generali Group company to which the report relates;
4. Whether the case involves:
 - Top Management
 - Compliance Officer
 - Significant accounting, auditing or financial matters.

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

7. Evaluation and investigation of 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.

A preliminary evaluation will be undertaken to ensure they are 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, with support from Internal Audit and other external professional advisors, as required.

8. Remedial Measures

Following the investigation, the Compliance Function will identify any remedial measures that are required.

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

All remedial measures will be submitted to the company CEO/administrative body for final decision.

9. EthicsPoint Database

All the reported cases within Generali Group will be recorded on EthicsPoint database, 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.

EthicsPoint Database is hosted by a third party provider on servers located within the European Union.

10. Reporting

EthicsPoint Database 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.

11. Conclusion of the Case and Removal of Personal Data

Once the case has been concluded, personal information held within EthicsPoint Database will be removed in accordance with the applicable group rules and local provisions and only anonymized information is retained to allow reporting and trend analysis.

Where it is necessary to complete remedial measures or as required by local legislation, personal data may be maintained by the relevant functions outside the EthicsPoint Database.