

2023  
Ethics Report

# 2023 Ethics Report

## Unipol Gruppo Ethics Officer

### 2023 Ethics Report and Statement to the Board of Directors regarding, inter alia, the general consistency between the principles declared in the Code and the company management

#### 1. Introduction

During 2023, the Appointments, Governance and Sustainability Committee met on ethics issues as follows:

- on 22 March to approve the 2022 Ethics Report and the related Statement to the Board of Directors;
- on 7 November to examine the Function's activities in the period 1 January-31 October 2023.

#### 2. Reports and requests received

Note that the Code of Ethics envisages that communications and requests may be submitted by anyone to the Ethics Officer, in writing via ordinary post, by e-mail (to [responsabile.etico@unipol.it](mailto:responsabile.etico@unipol.it)) or by phone.

Such contact (which can be assessed by the Ethics Officer only if submitted in writing and not anonymously, with the guarantee of utmost confidentiality), can be reports of alleged breaches of the contents of the Code of Ethics, criticisms, suggestions and, in general, requests for clarifications and/or interpretative opinions on the most suitable models of conduct to avoid breaches of or non-compliance with the Code of Ethics.

In 2023, a total of **149** reports and requests were received in the dedicated e-mail inbox of the Ethics Officer, as opposed to 114 in 2022 and 145 in 2021.

The reports and requests received can be broken down as follows:

<b>Reports/requests received</b>	<b>2023</b>	<b>2022</b>	<b>2021</b>
Reports of breaches of the Code of Ethics	15	14	7
Opinions requested from the Ethics Officer	1	2	2
Complaint-type reports	62	61	125
Contacts of various types	71	37	11
<b>Total</b>	<b>149</b>	<b>114</b>	<b>145</b>

## ***2.1 Reports relating to alleged and specific breaches of the Code of Ethics***

Reports addressed to the Ethics Officer by any stakeholder and considered by the Ethics Officer to be their responsibility are considered as such, as they are actually attributable to alleged and specific breaches of the Code of Ethics.

The Ethics Officer investigates them in accordance with the provisions of the Code of Ethics and the Regulations of the Appointments, Governance and Sustainability Committee: the investigations are conducted by carrying out in-depth checks of the situations reported, also by consulting and involving the company structures concerned and/or called into question (always, however, with utmost confidentiality).

On completion of the necessary verification activities, the Ethics Officer takes action as follows:

- a) in the most serious cases, submits the investigation results to the Appointments, Governance and Sustainability Committee for its related assessments and decisions;
- b) in other cases, directly defines the issue reported, in compliance with the Committee Regulations, discussing the most delicate situations with the Chairman.

In the reference period considered (1 January-31 December 2023), the Ethics Officer assessed **15 reports** attributable to the type referred to in letter b), while none were received relating to the type referred to in letter a).

In all cases, an investigation was conducted to obtain an accurate analysis of the event reported.

In this regard, note that, in the event of reports of potential non-compliance with the principles of the Code, the Ethics Officer has 60 days to open a specific investigation. This may involve launching analysis and further study (conducted in the utmost confidentiality), to verify whether there has been any conduct in conflict with the principles of the Code of Ethics and the Charter of Values, also for the purpose of avoiding the repetition of any conduct deemed improper and promoting suitable awareness-raising actions on the ethics principles referred to in the Code.

This is essentially the activity carried out by the Ethics Officer - specifically mentioned in the Organisation, Management and Control Model pursuant to Legislative Decree 231/2001 - with the aim of adopting appropriate "restorative justice" mechanisms to identify conduct that, by the methods considered most suitable, can restore the *status quo ante* with respect to confirmed breaches.

So, with reference to this type of activity, the Ethics Officer was involved in the aforementioned 15 cases, and the results of investigations made it possible to confirm:

- that 2 reports were valid, though minor breaches (as described under numbers 1 and 2 below), therefore resolved independently by the Ethics Officer,
- that 13 reports proved groundless (as described below under numbers 3 to 15).

Summary descriptions of the 15 reports relating to alleged and specific breaches of the Code of Ethics are provided below.

- 1) The most significant concerned a former **Employee** of a Group Company, who wrote to the Ethics Officer describing the event that had involved them, expressly classifying it as ethically material.

Essentially, after recruitment the individual was later dismissed due to failure to pass the probationary period, despite spending only two weeks in service. Although the work performance was not fully in line with the expectations of a specific company context, the Ethics Officer deemed it necessary to deploy their Function prerogatives by taking firm action as - though there had clearly been a need for more training to become fully operational - **the early dismissal implied ethically significant critical issues.**

To this end, the relevant corporate functions of the Chief Human Resources and Organisation Officer were involved, considering that this case could indicate possible breaches of the principles of the Charter of Values and the Code of Ethics (particularly Respect, Solidarity, Responsibility).

The action led to an effective amicable solution to the potential dispute, offering an actual outplacement/reskilling process to the individual in order to overcome the moment of difficulty experienced. Despite having found another job in the meantime, the individual stated their complete satisfaction.

- 2) Another different case was that of a **Customer**, who contacted the Ethics Officer to report the improper behaviour of an Agent, who allegedly used impolite, if not aggressive, tones and manner towards the customer due to non-renewal of a policy.

With the support of the Chief Commercial Officer structures, the Ethics Officer was able to ascertain that **the conduct had not been entirely proper** and therefore took action arranging for the Agent to make a formal apology to the former Customer and to sensitise the Agent to the adoption, in the future, of a style and language suitable for a representative of the Unipol Group and in line with the Code of Ethics.

- 3) Again in the context of managing reports relating to alleged and specific breaches of the Code of Ethics, the Ethics Officer dealt with a matter brought to their attention by a Group Company **Employee**, who had involved the Function when there appeared to be breaches of the ethics principles of which the Group should be informed in the context of personal relations with the line manager.

The Ethics Officer, after gathering the necessary information and assessing the absence of critical issues pertaining to the Function, as these were instead normal personal problems between two employees, decided to involve the relevant Function of the Chief Human Resources and Organisation Officer - People Management and the line management of the individual concerned, facilitating remediation of the friction that had arisen and re-establishing a more serene working climate.

- 4) Equally worthy of an in-depth assessment of potential ethical implications was the report of another **Employee**, who contacted the Function believing that they had

been the victim of conduct adopted by colleagues that was not in line with the principles of the Charter of Values and Code of Ethics.

The investigation, conducted directly with the reporting person and with their line manager, allowed the Ethics Officer to ascertain that in reality it was a misperception of the situation by the Employee, who in that specific period was suffering particular personal and emotional vulnerabilities. Indeed, the comfort offered and the willingness to listen by both the line manager and the Ethics Officer allowed the individual to consider the critical issue overcome, thereby eliminating any possible conflict with the Company.

- 5) In addition, one issue was brought to the attention of the Ethics Officer by an **Employee** who indicated their problems as a vulnerable worker in relation to the lack of access to smart working methods.

As this is a matter expressly governed by Law, with which the Company was complying in full, the Ethics Officer ascertained that the matter brought to their attention was immaterial from an ethics perspective.

- 6) Also worth mentioning is the case of a **Trade Union**, which contacted the Ethics Officer to report critical issues that had emerged in the management of an employee by a settlement services contractor, considering there were ethics-related problems in the conduct of the supplier, which allegedly unfairly and unlawfully dismissed one of its staff after a number of disciplinary sanctions had been inflicted.

After assessing the complex situation with assistance from the relevant Functions of the Chief Human Resources and Organisation Officer, as well as the Company directly involved in the contract, the Ethics Officer was able to ascertain that the Worker intended to take specific legal action to assert their rights, and therefore informed the reporting person that the claims filed could not be investigated internally, as the Ethics Officer cannot replace or conflict with decisions of the Judicial Authority that would be called upon to settle the dispute.

In any event, after further involvement of the Trade Union, the Ethics Officer ordered a further and more in-depth investigation into the matter to ascertain whether the conduct reported had included any breach of principles of the Code of Ethics and the Charter of Values. From the findings, it emerged that the service provider had acted fairly and that the dismissal had been for purely technical reasons linked to the methods applied in performing the activities.

- 7) In addition, note the case of one **Customer** who wrote to the Ethics Officer complaining about an unjustified increase in an insurance premium, allegedly caused by a lack of transparency by the reference Agency, which was said to have proposed certain contractual changes that leveraged the customer's temporary health difficulties and medical condition.

The action of the Ethics Officer, who raised the awareness of the offices of the “Chief Commercial Officer”, on this point, resulted in a solution deemed acceptable by the customer.

- 8) Then there is the case of a **Customer** who wrote to the Ethics Officer complaining about the behaviour of an Agent, deeming it improper and aggressive in the manner and tone used during a telephone conversation.

With the support of the Chief Commercial Officer structures, the Ethics Officer was able to ascertain that the actual events were completely different from those reported, as it was the reporting person who had lost control and assumed a non-conformist approach.

- 9) Another **Customer** contacted the Ethics Officer to report alleged shortcomings of an Agency, which allegedly failed to offer a prompt response to a request relating to compensation, specifically classifying this alleged inaction as ethically relevant.

Through the offices of the Chief Commercial Officer, the Ethics Officer was instead able to ascertain that an exhaustive response to the issue had been provided by the Agency within a reasonable time and decided to dismiss the report in question without follow-up.

- 10) A different situation was brought to the attention of the Ethics Officer by an **Agent**, who among others had contacted the Function to request clarification as to the reasons for termination of the agency mandate by UnipolSai, considering it not actually based on reaching the age limit for Agents, but in reality to facilitate entry of a certain agent into the Network.

The investigation, carried out with the support of the Chief Commercial Officer, made it possible to ascertain that in effect it was the enforcement of strategic decisions concerning streamlining of the organisational structure of the distribution network, also with a view to greater stability over time in a general framework of generational handover, consequently with no ethical implications in the matter.

- 11) A further case was reported by a **former sub-Agent**, who wrote to the Function believing they were the victim of defamatory statements by an Inspector of the Company. The Ethics Officer, after assessing the matter with the support of the Chief Commercial Officer, was instead able to ascertain that there had been simple exchanges of views, without ethical implications, at the time of termination of a collaboration agreement, when the reporting person hoped to work with another Agency in the area.

- 12) Another **sub-Agent** wrote to the Ethics Officer complaining of alleged discrimination, also for health reasons, in the decision to terminate the mandate by the Agent. In reality, the Ethics Officer, also with the support of the Chief Commercial Officer, verified that the early termination of the professional relationship was the result of decidedly over-the-top behaviour of the collaborator, hostile and disrespectful even towards all personnel of the Agency, which had in any case acted in full compliance with the collaboration agreement in place.

- 13) Also note the case of an **Agency Collaborator** who contacted the Ethics Officer to report being the victim of particularly hostile, aggressive and discriminatory behaviour by an Agent, allegedly used against the reporting person - moreover also at meetings in the presence of various people - adopting disrespectful, inappropriate and offensive tones.

The investigation, aimed at verifying the exact sequence of events, conducted also in this case with assistance from the Chief Commercial Officer, allowed the Ethics Officer to ascertain that the behaviour reported consisted in an Agent's reaction to provocative and aggressive tones and methods used by the collaborator, and therefore aimed to restore order to a commercial meeting on technical-operational matters. In addition, the in-depth investigation conducted by the Ethics Officer was able to verify that no offensive or vulgar term had been used nor any discrimination implemented by the Agent.

- 14) Likewise, in concert with the Chief Commercial Officer structures, the report from one **Agency** was handled, which had informed the Ethics Officer it had been the victim of improper, inappropriate and even threatening behaviour by another Agency at the time of transfer of a customer's portfolio.

In the case in question, the Ethics Officer contacted the lawyer of the reporting Agency, announcing - as later happened - that the matter would be resolved by the Chief Commercial Officer through an amicable settlement between the disputing Agencies, so as to make any legal action superfluous.

- 15) Lastly, again in the context of ethically relevant reports, note the case of an **external party** who wrote to the Ethics Officer alleging discrimination in the conduct of the Group which, despite repeated submission of job applications (specifically in the call centre area), had never invited the individual to an interview.

The Function therefore carried out the necessary checks with the competent structure of the Chief Human Resources and Organisation Officer - Head of Organisation and Recruiting, ascertaining that the non-inclusion in the selection process was motivated solely by the number of applications recorded on the company systems, also for that particular job, and therefore the only reason the person had not been contacted was the excess number of applications, not for reasons remotely discriminatory in terms of gender or age.

To conclude, in **2023 only two situations of actual, albeit minor, breach of the Code of Ethics were identified**<sup>1</sup>, settled and promptly remedied also thanks to the action of the Ethics Officer, who in full application of their prerogatives therefore aimed - among other things - to reconcile conflicts or remedy ethically relevant events.

In the remaining cases mentioned above, the Ethics Officer was able to deploy their prerogatives, taking action to prevent and define critical issues before they had a more significant impact on the Group, also from ethics and reputational perspectives.

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<sup>1</sup> Refers to the cases described under numbers 1 and 2.



In light of all the above, note that in absolute numbers the reports of alleged breaches of the Code of Ethics increased slightly in 2023 compared to the previous two-year period (14 in 2022 and 7 in 2021), but in reality almost all proved unfounded. Therefore, this is not a deterioration of the situation understood as an increase in critical issues with an ethically relevant impact, but only increased recourse to contacting the Function.

Moreover, with a view to constantly verifying full compliance with the ethical values of which the Group is informed, note that the feedback offered to the various reporting persons by the Ethics Officer has never resulted in a response or continuation in the form of requests for clarification and insights<sup>2</sup>. This confirms that the investigations carried out and the types of response issued (complete, justified and detailed) were always considered exhaustive, clear and understandable, therefore, "irrefutable" by those reporting alleged breaches.

**In essence, it can be confirmed that ethics has now become the lifeblood of the Group, permeating the conduct of all players (employees, agency network, external collaborators, suppliers), as there can be no other explanation for the fact that, at least in the last ten years, no well-founded report of a serious nature has been confirmed.**

## ***2.2 Opinions requested from the Ethics Officer***

This category includes cases in which the Ethics Officer, as required by the Code of Ethics, provides clarification on the meaning and interpretation of the Code in relation to specific issues raised by the various stakeholders (for example, consistency between Business/Policies and Values; clarification on the most suitable forms of conduct to avoid breaches of the Code, information in general on company ethics issues, in relation to the contents of the Charter of Values and the Code of Ethics).

This activity is carried out in full compliance with the prerogatives of the Function described in the Organisation, Management and Control Model pursuant to Italian Legislative Decree 231/2001, which states, inter alia, that "the Ethics Officer of the Unipol Group was appointed as a proactive contact for opinions and/or advice on proper application of the Code of Ethics and as a focal point for receiving and filtering any reports of breaches".

During the period under review, the Ethics Officer received only **one** request with these characteristics.

This was the case of an **Employee** of a Group Company who asked for an opinion on the reasons that led to the decision to consider the probationary period unsuccessful, assuming a connection

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<sup>2</sup> Except in the one case described under no. 12 in this Report, in which the reporting person - in a confrontational and specious manner - challenged the response given to them, considering it did not match their personal view of the facts (even if the investigation of the Ethics Officer had been carried out in a completely precise manner).

with their particular disability. The interested party specified that they did not intend to submit a report, but rather to open debate on the issue of individuals affected by the same disability.

The Ethics Officer carried out the necessary checks with the relevant structure of the Chief Human Resources and Organisation Officer - People Management, ascertaining that the reasons for non-renewal of the employment relationship had nothing to do with this disability, but instead rested exclusively on professional and occupational shortcomings. It was also ascertained, and the interested party informed, that within the Group the issue of protection of personal critical health situations is duly taken into account, to the point that the disability is also widely monitored by a dedicated Disability Manager Function.

### ***2.3 Complaint-type reports (relating to inefficiencies, delays, disputes, even with presumed ethical profiles)***

**62 reports** were received by the Ethics Officer in 2023 which were generically registered as being "**complaint-type**" reports (61 in 2022 and 125 in 2021).

This category generally includes all reports addressed to the Ethics Officer relating to disservice, delays, disputes (typically in the settlement, commercial and underwriting sectors).

These are not cases under the strict responsibility of the Ethics Officer, who, as recipient of the report, in any event undertakes its management by forwarding it to the competent company function (mainly Customer Advocacy) and informing the reporting person that the matter reported is in hand.

According to consolidated practice, and in line with the values and principles that inspire the Group in terms of listening and attention to customer needs and service efficiency, with regard to such reports that have no ethical relevance, the Ethics Officer in effect acts as "facilitator" of possible solutions, collaborating in particular with the Customer Advocacy Function and with other structures on a case-by-case basis (such as Settlement Controls, MV, Sales Department, Commercial Communication).

If the complaint also contains generic references to the Code of Ethics (even if not sufficient to qualify as a true allegation of specific breaches) or if considered appropriate, the Ethics Officer actively collaborates with the relevant Functions, examining the case and providing their input to preparation of the related response.

Over the years this type of report appears to be constantly on the rise, as recourse to the Ethics Officer is increasingly perceived by stakeholders as a channel for direct contact with the Group, so that a problem (even if not directly related to a potential breach of values and principles) can reach the relevant structure and be settled relatively quickly.

In relation to **the 62 complaint-type reports** received, **none** had ethical implications and the majority concerned issues relating to claims (rejections or settlement delays, lack of responses from settlement personnel) or to the agency network.

One particular case of contact that triggered a more direct involvement of the Ethics Officer, albeit in the sense indicated above, was that from a **former Customer** who had filed a dispute against the Company, considering unfair the settlement for a theft in which they were a victim.

As the court costs were particularly expensive, as the losing party was an elderly person in economic hardship, the Ethics Officer Function worked with the relevant structures of the Chief Claims Officer to reach an agreement to reduce the person's debt and arrange a less costly deferred payments plan.

**To conclude, in relation to this type of report, no situations of confirmed breach of the Code of Ethics were found in 2023.**

### ***2.4 Contacts of various types***

In this category, various types of contact managed by the Ethics Officer were recorded (for example, submitting CVs for consideration in personnel selection procedures, applications for professional partnerships, requests for sponsorships, etc.), which are redirected to the relevant Corporate functions or to the dedicated institutional sites.

As at 31 October, a total of **71** had been recorded.

Among these applications and requests, only a small, limited number required more significant and active input from the Ethics Officer, who therefore had to carry out their activities not only in terms of specific in-depth analyses, but also as a link between various Corporate functions in the role of facilitator described above, carried out with a view to implementing the inspiring values and principles of the Group's work.

### ***3. Training activity: user trends of the EticaMente! course***

Note that *EticaMente!* is the online training course on the Code of Ethics for all employees, agents and agency staff of the Unipol Group.

It represents the completion of a broader training project on ethics and value topics, the first phase of which consisted in a classroom course for all Group HR Managers (started in 2017 and completed in 2020, with a total of around 1,500 participants), managed by Unica-Unipol Corporate Academy (now Unipol Academy).

*EticaMente!* was conceived by "Unica" and by the Ethics Officer in 2019 and launched in July 2020 on the company intranets (Futur@ and Ueba), in order to raise awareness and train the broad 43,000-strong target audience (employees, agents and agency network personnel) in terms of awareness and knowledge of the Charter of Values and the Code of Ethics, as distinctive inspiring elements in

everyday work and as fundamental elements, among other things, of the Organisation, Management and Control Model in force and IVASS Regulation no. 38/2018.

In order to suggest a firm and not merely theoretical reflection on the principles of the Charter and the Code, *EticaMente!* was built with a didactic approach far from traditional learning approaches: as in a serious game, users are asked to identify themselves in situations and roles that are easily recognisable in the company, acting as protagonists and making decisions that involve an assessment of potential ethical implications.

The guiding principle of the course is that there are often no right or wrong decisions, but are only more or less consistent with the Group's principles and values. Three terms summarise its spirit: *Engagement - Empowerment - Motivation*.

Considering the importance of creating a solid common ethical and value culture within the Group, the Ethics Officer, also in consideration of their task of supervising knowledge of the Code of Ethics and raising awareness of its values, deemed it appropriate to activate constant monitoring of usage trends, accompanied by specific reminder actions.

The assessment of progress in user trends of the *EticaMente!* course for 2021 had revealed that, overall, participation was still limited compared to the breadth of potential users.

However, the awareness-raising initiatives adopted in 2022 (with the support of the Chief Commercial Officer and the Departments that showed a lower participation in this training opportunity) had proved to be not 100% effective.

Consequently, after the initial optional phase, the course was made mandatory in April 2023 for Employees and in July 2023 for the Distribution Networks.

At 31 December, the attendance is therefore as follows:

	<b>December 2023</b>	<b>%</b>	<b>December 2022</b>	<b>%</b>	<b>December 2021</b>	<b>%</b>
<b>Employees</b>	8,462	80.4%	4,885	44.57%	3,233	30.7%
<b>Networks</b>	22,807	69.8%	4,143	12.47%	2,266	7.1%
<b>Total</b>	<b>31,269</b>	<b>72.4%</b>	<b>9,028</b>	<b>20.44%</b>	<b>5,499</b>	<b>13%</b>

Note that the **total use of the course at 29 February 2024 had increased to 77.8%**.

In light of the data summarised below, it can be seen that planning the course as mandatory led to a considerable increase in total use of the course, but it is now necessary to assume additional awareness-raising actions for the current year, with the aim of reaching completion by practically the entire target audience.

#### **4. *Final considerations and assessment of the general consistency between the principles declared in the Code and company management.***

In 2020, due to the critical issues generated by the health emergency, the operations of the Ethics Officer were marked by a strong increase in the recourse to the Function by stakeholders (in particular, Customers) to report problems of various kinds, mainly concerning insurance and in any case not related to profiles of compliance with the Code of Ethics.

2021 also recorded a substantial return to the performance of activity more closely related to the prerogatives of the Ethics Officer, a trend which fully stabilised in 2022.

#### **2023 confirmed the final stabilisation of the activity entrusted to the Ethics Officer.**

More specifically, the activity was based on the essential prerogatives of the Function which can be summarised as follows:

1. promote and organise, in conjunction with the different corporate functions and with the Ethics Committee (now the Appointments, Governance and Sustainability Committee), regular activities to disseminate knowledge and raise awareness of the Code;
2. provide clarifications on the meaning and interpretation of the Code in relation to specific questions asked by the various stakeholders;
3. receive information on alleged breaches of the Code by the various stakeholders directly and decide whether and how to investigate; in straightforward cases, to carry out the relevant checks and resolve disputes;
4. prepare the Ethics Report, an annual document that reports on the consistency between ethical principles and organisational activities, identifying areas at risk and verifying the effective implementation of the Code.

The performance of reports managed from 1 January to 31 December 2023 (in total **149**) confirms the realignment of Ethics Officer activity with average normal levels, after the anomalous peaks caused by the health emergency which, moreover, had only affected the “complaints” category, unlike the reports of alleged and specific breaches of the Code of Ethics (in total 15), which have always remained minimal and in most cases have been investigated and proved groundless<sup>3</sup>.

This confirms that the general consistency between the principles stated in the Code and company management has deep historic roots.

Indeed, it can be stated that ethics is a fundamental value for the Group, also in the framework of provisions of the Organisation, Management and Control Model pursuant to Italian Legislative Decree 231/2001, according to which “the Code of Ethics is general in scope, as it contains a series of principles of corporate ethics that UnipolSai recognises as its own and calls for its compliance by all

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<sup>3</sup>Note that 13 proved groundless and 2 were confirmed, but minor.

those who cooperate in pursuing the corporate purpose", and is therefore a fully-fledged element of the more general corporate governance system of the Group.

For this reason, it is consolidated normal practice that, in general, the Ethics Officer responds to all reporting persons, regardless of the nature and content of the matters brought to their attention, for the express purpose of giving a true sign of "presence" and constant ethics monitoring of the work of all employees.

In conclusion, **the Appointments, Governance and Sustainability Committee is informed - also in accordance with Article 2.2 of the Code of Ethics - of the general consistency between the principles declared in the Code and company management.**

Bologna,

20 March 2024

## APPENDIX

***Table showing the breakdown of 2023 reports relating to alleged and specific breaches of the Code of Ethics into homogeneous categories/clusters of the international standards, for reporting purposes***

In 2021, Sustainability and the Ethics Officer developed and shared a model for the classification of reports relating to alleged and specific breaches of the Code of Ethics, to be used in normal relations with non-financial analysts. The model translates into an extremely concise document, from which ethics-related data and information on company policies can be drawn, provided as an appendix to the annual Ethics Report.

The model reconciles the specific value system of Unipol (Charter of Values/Code of Ethics) with areas/issues uniquely legible according to international standards, in terms of coherent behaviours and respective reporting criteria (the fundamental reference is represented by the 10 principles of the United National Global Compact, to which Unipol guarantees its commitment).

The model illustrates a series of general categories (broken down by stakeholders or sensitive issues), based upon “clusters” to which to attribute the circumstances of breach of the Code of Ethics managed annually, with an essential description of the actions undertaken.

The table is compiled with reference to the period 1 January-31 December 2023 (15 reports of alleged breaches of the Code of Ethics)<sup>4</sup>:

Cluster	Issue	Reports of alleged and specific breaches of the Code of Ethics	Management of the report
<b>Leadership in Civil Society</b> (UNGC: Human Rights; Environment; Anti-Corruption)  Reports of breaches of ethics principles/values relating to: Civil Society/Future generations/Environment	-	-	-
<b>Employees, Agents and Collaborators</b> (UNGC: Human Rights; Labour; Anti-Corruption)  Reports of breaches of ethics principles/values relating to: Employees, Agents and Collaborators	Elimination of discrimination in respect of employment and occupation	1- <u>Employee</u> (1): report of alleged breach of the Code of Ethics in a company decision on early termination of an employment relationship, before completion of the	<i>Investigation</i> . completed <i>Conclusions</i> : confirmation, though slight, of the breach reported with follow-up

<sup>4</sup> The numbers in brackets follow the numbering adopted in point 2.1 of this Report.

		probationary period	"remedial" action in concert with the company functions concerned
<b>Employees, Agents and Collaborators</b> (UNGC: Human Rights; Labour; Anti-Corruption)  Reports of breaches of ethics principles/values relating to: Employees, Agents and Collaborators	Elimination of discrimination in respect of employment and occupation	1- <u>Employee (3)</u> : report of alleged breach of the Code of Ethics in relations between an employee and their Manager	<i>Investigation.</i> completed <i>Conclusions.</i> breach proved groundless, communicated to the reporting person
<b>Employees, Agents and Collaborators</b> (UNGC: Human Rights; Labour; Anti-Corruption)  Reports of breaches of ethics principles/values relating to: Employees, Agents and Collaborators	Elimination of discrimination in respect of employment and occupation	1- <u>Employee (4)</u> : report of alleged breach of the Code of Ethics in relations with colleagues	<i>Investigation.</i> completed <i>Conclusions.</i> breach proved groundless, communicated to the reporting person
<b>Employees, Agents and Collaborators</b> (UNGC: Human Rights; Labour; Anti-Corruption)  Reports of breaches of ethics principles/values relating to: Employees, Agents and Collaborators	Elimination of discrimination in respect of employment and occupation	1- <u>Employee (5)</u> : report of alleged breach of the Code of Ethics in a company decision on smart working	<i>Investigation.</i> completed <i>Conclusions.</i> breach proved groundless, communicated to the reporting person
<b>Employees, Agents and Collaborators</b> (UNGC: Human Rights; Labour; Anti-Corruption)  Reports of breaches of ethics principles/values relating to: Employees, Agents and Collaborators	Elimination of discrimination in respect of employment and occupation	1- <u>Employee (6)</u> : report of alleged breach of the Code of Ethics regarding the management of its employees in an external settlement services contractor	<i>Investigation.</i> completed <i>Conclusions.</i> breach proved groundless, communicated to the reporting person
<b>Employees, Agents and Collaborators</b> (UNGC: Human Rights; Labour; Anti-Corruption)  Reports of breaches of ethics principles/values relating to: Employees, Agents and Collaborators	Elimination of discrimination in respect of employment and occupation	2- <u>Agents (10-12)</u> : report of alleged breach of the Code of Ethics regarding agency mandate termination	<i>Investigation.</i> completed <i>Conclusions.</i> breaches proved groundless, communicated to the reporting persons
<b>Employees, Agents and Collaborators</b> (UNGC: Human Rights; Labour; Anti-Corruption)  Reports of breaches of ethics principles/values relating to:	Respect for personal dignity	1- <u>Agent (11)</u> : report of alleged breach of the Code of Ethics with regard to relations with a Sales Representative of the Company	<i>Investigation.</i> completed <i>Conclusions.</i> breach proved groundless, communicated to



Employees, Agents and Collaborators			the reporting person
<b>Employees, Agents and Collaborators</b> (UNGC: Human Rights; Labour; Anti-Corruption)  Reports of breaches of ethics principles/values relating to: Employees, Agents and Collaborators	Respect for personal dignity	1- <u>Agent (13)</u> : report of alleged breach of the Code of Ethics regarding relations between an Agent and a sub-Agent	<i>Investigation:</i> completed <i>Conclusions:</i> breach proved groundless, communicated to the reporting person
<b>Employees, Agents and Collaborators</b> (UNGC: Human Rights; Labour; Anti-Corruption)  Reports of breaches of ethics principles/values relating to: Employees, Agents and Collaborators	Respect for personal dignity	1- <u>Agent (14)</u> : report of alleged breach of the Code of Ethics regarding relations between two Agencies concerning a portfolio	<i>Investigation:</i> completed <i>Conclusions:</i> breach proved groundless, communicated to the reporting person
<b>Employees, Agents and Collaborators</b> (UNGC: Human Rights; Labour; Anti-Corruption)  Reports of breaches of ethics principles/values relating to: Employees, Agents and Collaborators	Equal opportunities	1- <u>External (15)</u> : report of alleged breach of the Code of Ethics regarding lack of access to interviews for potential recruitment	<i>Investigation:</i> completed <i>Conclusions:</i> breach proved groundless, communicated to the reporting person
<b>Suppliers</b> (UNGC: Human Rights; Labour; Anti-Corruption; Environment)  Reports of breaches of ethics principles/values relating to: General Procurement Suppliers/Core Business Suppliers	-	-	-
<b>Business integrity</b> (UNGC: Anti-Corruption)  Reports of breaches of ethics principles/values relating to: Shareholders/Investors/Directors	-	-	-
<b>Business responsibility</b>  Reports of breaches of ethics principles/values inherent in insurance and non-insurance business decisions/operations (on products, services, initiatives, etc.) involving Customers/Consumers	Transparency in relations	1- <u>Customer (7)</u> : report of alleged breach of the Code of Ethics regarding an increase in insurance premium with no adequate reason or justification	<i>Investigation:</i> completed <i>Conclusions:</i> breach proved groundless, communicated to the reporting person
<b>Business responsibility</b>	Service quality	1- <u>Customer (2)</u> : report	<i>Investigation:</i>

<p>Reports of breaches of ethics principles/values inherent in insurance and non-insurance business decisions/operations (on products, services, initiatives, etc.) involving Customers/Consumers</p>	<p>(discussion, dialogue, understanding, involvement of existing or potential Customers)</p>	<p>of alleged breach of the Code of Ethics regarding disrespectful behaviour of an Agent towards a customer</p>	<p>completed <b>Conclusions:</b> <b>confirmation, though minor, of the breach</b> reported with follow-up “remedial” action in concert with the company functions concerned</p>
<p><b>Business responsibility</b></p> <p>Reports of breaches of ethics principles/values inherent in insurance and non-insurance business decisions/operations (on products, services, initiatives, etc.) involving Customers/Consumers</p>	<p>Service quality (discussion, dialogue, understanding, involvement of existing or potential Customers)</p>	<p>1- <u>Customer (8)</u>: report of alleged breach of the Code of Ethics regarding disrespectful behaviour of an Agent towards a customer</p>	<p><b>Investigation:</b> completed <b>Conclusions:</b> breaches proved groundless, communicated to the reporting persons</p>
<p><b>Business responsibility</b></p> <p>Reports of breaches of ethics principles/values inherent in insurance and non-insurance business decisions/operations (on products, services, initiatives, etc.) involving Customers/Consumers</p>	<p>Service quality (discussion, dialogue, understanding, involvement of existing or potential Customers)</p>	<p>1- <u>Customer (9)</u>: report of alleged breach of the Code of Ethics regarding an Agent's failure to promptly reply to a customer</p>	<p><b>Investigation:</b> completed <b>Conclusions:</b> breach proved groundless, communicated to the reporting person</p>



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