GUIDELINES FOR NON-LIFE BUSINESS UNDERWRITING WITH REFERENCE TO ENVIRONMENTAL, SOCIAL AND GOVERNANCE FACTORS

(“NON-LIFE ESG GUIDELINES”)

May 2025

Unipol

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1. Introduction

The Unipol Group (the 'Group') is committed to contributing to sustainable development, as defined by the United Nations 2030 Goals (Sustainable Development Goals or SDGs), by integrating this commitment into its business model. In the insurance sector and in the financial sector generally, there is a growing interest in understanding the consequences of sustainability-related risks on business performance, as well as the impacts of business decisions on the environment, individuals, and society.

This document defines guidelines for the management of Non-Life business underwriting (the "Guidelines") with reference to:

- Sustainability risks, in order to define the approach to identify, assess and manage their potential effects on the risks of loss or adverse change in the value of insurance liabilities, as part of the underwriting processes;
- Adverse sustainability effects that may be generated even indirectly by the decisions of Companies in the underwriting process, with potential impacts also in terms of reputational risk.

The focus on Sustainability risks and adverse Sustainability effects in underwriting processes ensures compliance with the Group's values, demonstrating responsibility in decision-making and dialogue with stakeholders.

1.1. Document Objectives

The Guidelines govern underwriting and pricing activities in all branches of the Non-Life business by promoting:

- the integration of environmental, social and corporate governance factors (the so-called 'ESG factors') into the insurance core business processes and strategies;
- the implementation of a management approach that allows a correct and timely assessment of exposure to Sustainability Risks, along with the definition of responsibilities and consequent actions;
- the gradual adoption of a due diligence approach that incorporate Adverse sustainability effects into assessments related to the underwriting of policies with corporate policyholders operating in the various economic sectors, through a system of identification and monitoring thereof;
- the gradual integration of appraisals of sustainability issues into the insurance business model;
- the introduction of tariff flexibility, where applicable, in relation to the Risks associated with the sustainability of its customers.

1.2. Approval and revision of the Guidelines

The Guidelines, whose drafting/review engages all relevant company departments to ensure a clear definition and sharing of objectives, roles, and responsibilities, are approved by the Board of Directors of the parent company Unipol (the 'Parent Company'), in the exercise of its management and coordination activities on its subsidiaries and in accordance with the Group's corporate process for the preparation and validation of company policies.

Subsequently, the Boards of Directors of the Companies in scope, as part of their responsibilities in the area of governance, internal control system and risk management, evaluate and approve the Guidelines, to the extent applicable, in accordance with specific industry regulations and their own business model.

The Guidelines shall be reviewed and – if necessary – amended whenever requirements for regulatory updates, interventions by Supervisory Authorities, *business* strategies or changes in the context (major changes in business processes, significant structural reorganisations, important changes in the Group's business sectors, adjustments in the Relevance Analysis) so require and, in any case, at least annually.

The Guidelines are communicated and made available by the Companies in scope to all relevant personnel through appropriate communication channels and posted on their respective websites.

The Group Insurance General Manager drafts and updates the Guidelines and proposes them to the competent bodies for review and approval.

2. Reference Context

2.1. Internal and external regulatory references

The Guidelines were drafted in accordance with current legislation and the sector supervisory guidelines set out below.

European legislation:

- Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability reporting in the financial services sector;
- Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 establishing a framework to encourage sustainable investment and amending Regulation (EU) 2019/2088;
- Commission Delegated Regulation (EU) 2021/1256 of 21 April 2021 amending Delegated Regulation (EU) 2015/35 as regards the incorporation of sustainability risks into the governance of insurance and reinsurance firms;
- Commission Delegated Regulation (EU) 2021/1257 of 21 April 2021 amending Delegated Regulations (EU) 2017/2358 and (EU) 2017/2359 as regards the incorporation of sustainability factors, sustainability risks and sustainability preferences into the product control and governance requirements for insurance companies and distributors of insurance products, and into the rules applicable to the conduct of business and investment consulting concerning insurance investment products;
- EIOPA Report on Non-Life underwriting and pricing in light of climate change (EIOPA-BoS-21/259).

Italian legislation:

- Legislative Decree No. 209 of 7 September 2005 ("Private Insurance Code");
- IVASS Regulation No. 38/2018 laying down provisions on the corporate governance system et seq.

2.2. Scope of application

These Guidelines are adopted by the Group's insurance companies having their registered office in Italy and conducting Non-Life insurance business (the "Companies" or "Companies in scope").

This is without prejudice to the possibility for the Parent Company to identify, on the basis of risk-based assessments and within the limits of compatibility with specific sector regulations, to which other companies should the application of these Guidelines be extended.

With respect to the integration of the Adverse sustainability effects into the hiring criteria, the Guidelines apply in cases of contracts to be entered into with **legal entities other than natural persons ("legal entities")**, thus excluding business relationships with individual natural persons from the scope of application.

2.3. Definitions andterminology

Adverse effect (or adverse impact) on sustainability	Adverse impact, even indirect, of underwriting decisions on sustainability Factors.
Sustainability Factors, or ESG factors (Environmental, Social, Governance)	Matters with environmental, social and governance impact considered to be relevant for the Group, the reference stakeholders and for the society as a whole[1].
United Nations Sustainable Development Goals (or "SDGs")	Sustainable Development Goals – Sustainable Development Goals (SDGs) – defined within the scope of the "2030 Agenda for Sustainable Development" plan of action for people, the planet and prosperity, signed in September 2015 by the governments of 193 UN member states. It consists of 17 objectives, which in turn consist of 169 specific targets.

[1] Social, environmental and governance impact issues are defined as "environmental, social and personnel issues, respect for human rights and issues relating to the fight against active and passive corruption" as defined in Article 2 no. 24 of Regulation (EU) 2019/2088.

Principles for *Sustainable Insurance* (PSI)	An insurance industry initiative in cooperation with the *United Nations Environment Programme - Finance Initiative* (UNEP FI) and *United Nations Global Compact* (UNGC), which has defined 4 principles for incorporating environmental, social and governance issues relevant to insurance business into decision-making.
Sustainability / sustainability-related risk, or ESG risk	Any environmental, social or governance event or condition that, should it occur, could cause an actual or potential adverse effect t on the value of the investment or on the value of the liability.
Reputational Risk	The risk that an internal or external event will cause a misalignment between the Group's promises and actions and the expectations and perceptions of its main stakeholders and, therefore, may negatively impact their perception of the Group and, consequently, of the expected economic results.
Sustainable Success	The objective that guides the actions of the Board of Directors is the creation of long-term value for the benefit of shareholders, taking into account the interests of other stakeholders relevant to the company.
United Nations Global Compact (UNGC)	UN initiative which aims to promote the culture of corporate social responsibility through the sharing, implementation and dissemination of common principles and values. It provides for compliance with 10 Principles in four areas: Human Rights, Labour, Environment, Anti-Corruption.

3. Identification of sustainability risks and Adverse sustainability effects for Companies

The Group has established a transparent and systematic approach to the incorporation of sustainability factors into the underwriting process.

The importance of integrating ESG factors into the underwriting process is set forth, inter alia, in two key documents for the Group's strategy and management, namely the **Sustainability Policy** and the **Risk Management Policy**.

The Sustainability Policy defines the Group's commitments to improve its sustainability performance and to manage and mitigate: (i) preventing, mitigating, and remedying actual and potential negative impacts on sustainability arising from its activities or business relationships while enhancing positive impacts*;* (ii) addressing sustainability-related Risks to which it is exposed, in consistency with the Group's overall risk management system.

The Sustainability Policy, with specific reference to Sustainability Risks, refers to specific risk management policies specific in terms of operational implementation, and especially to the Risk Management Policy, which establishes the guidelines for the identification, assessment, monitoring and mitigation of risks, including environmental, social and governance risks, as well as the definition of operational limits within which to operate, in line with the general risk propensity defined by the Group (i.e. *Risk Appetite*) also by reference to specific risk management policies.

The Risk Management Policy explicitly states that, as part of the Group's overall risk management system (so-called *ERM – Enterprise Risk Management –* Framework), environmental, social and governance risks are identified and monitored in relation to their impact on underwriting risks; the impacts that risks related to environmental, social and governance factors may have on the Group's reputation are also identified and monitored. For the purpose of applying the Policy, in addition to the risks related to sustainability (also called 'endured risks'), potential negative impacts related to sustainability (also called 'generated risks') are also considered as falling within this scope of attention.

The identification of sustainability risks and negative effects on sustainability, relevant to the Group, occurs through several integrated processes.

With regard to sustainability risks, the Observatory of emerging and reputational risks, starting from the anticipation of macro-trends of changes in the external context, classified into four dimensions (social, technological, environmental, and political), identifies and classifies potential risk areas, highlighting which emerging risks have a direct connection with sustainability factors, and for the emerging and sustainability risks deemed as priorities, identify the main exposure factors to technical Damage risks. Indeed, the Group has developed a framework for assessing the potential exposure of insurance activities to emerging and sustainability risks; this process has made it possible to (i) identify the risk drivers, i.e., the attributes, features, variables, or other determinants related to the risk that influence the risk profile of a system, an entity, or a financial activity; as well as (ii) understanding the transmission channels, that is the causal chains that explain how the manifestation of risk drivers related to sustainability issues generates potential impacts within the different business dimensions comprised in the Enterprise Risk Management system. Indicators of exposure have therefore been defined for each risk category, using quantities commonly measured in the management of the insurance business, assessing the exposure of the main 'traditional' risk categories (including non-life insurance technical risk) to components of sustainability-related risks, and thus constructing a heatmap of Emerging and Sustainability Risks.

The identification of negative effects is supported by internal prerogatives acquired within the different functions and companies of the Group through: the strategic and operational management of sustainability issues, the dialogue within sustainability and/or sectoral networks, the consideration of experiences in engagement, dialogue, and listening to stakeholders, as well as in-depth desk studies on sustainability issues in the different sectors and operational contexts.

4. Incorporating sustainability risks into the Non-Life underwriting processes

The Companies are aware of the increasing prominence of Sustainability risks in Non-Life underwriting and pricing.

In general, the Group is committed, through its expertise and the services it has developed, and also with the involvement of the distribution network, to supporting its customers in reducing the sustainability risks to which they are exposed, by developing risk assessment activities, advising on prevention approaches, applying remote services, and thus increasing their access to insurance services.

The area in which the incorporation of Sustainability Risks has reached the highest level of maturity is climate change; this is (i) due to the particularly serious and urgent nature of managing its impacts, (ii) under the stimulus generated by the considerable focus of regulators and supervisors on the issue, and (iii) due to the significant efforts of the scientific and technological community to provide data and analysis to support the identification of related risks.

Companies are aware that acute physical risks from climate change in particular include changes in the frequency of large-scale catastrophic events, for which it is difficult to identify trends. At a general level, the Group is continuously engaged in identifying innovative solutions for the creation of shared value in the management of sustainability risks, with particular reference to climate change, by developing – also with the support and co-financing of EU institutions – tools that help raise public and private sector awareness of climate change risks and support the definition of adaptation and prevention measures, which help reduce risks while preserving insurability[2].

4.1. Incorporating sustainability risks into the Non-Life pricing processes

As part of the pricing process, the Companies in scope take into account Sustainability Risks and, in particular, the physical risks arising from climate change, by adopting the following control measures, with the appropriate proportions depending on the assessment of the more or less significant exposure to the risks of the reference lines of business and/or products[3]:

- implementation of a dynamic pricing policy, which allows to act promptly in defining the pricing interventions to be implemented with respect to newly issued policies, even in the face of changes related to the impacts of Sustainability risks;
- constant maintenance of the portfolio, by adjusting, when policies expire, to the latest tariff versions. To this end, it should be noted that the exposure to Sustainability Risks of the portfolios of the Companies in scope is mitigated by the prevalence of one-year and, to a lesser extent, multi-year contracts. In addition, for policies for which tacit renewal is envisaged, the possibility exists to adjust rates so as to take account of changed conditions related to Sustainability Risks, in consistency with the terms of the contract;
- periodic review of the technical provisions (e.g. deductibles, limits of insurance) relating to the guarantees associated with natural events, as well as the insurance cover offered in the case of changes in risk;

[2] See for example the LIFE DERRIS projects http://www.derris.eu/ and LIFE ADA https://www.lifeada.eu/it/, for which Unipol Assicurazioni is the lead partner.

[3] These are less significant for tailor-made products: such products are in fact the subject of individual negotiations with the policyholder, during which case-by-case evaluations are carried out, based on a freer and more dynamic pricing process. Similarly, the pricing of suretyship policies is normally carried out by means of precise assessments, since these are guarantees with often diverse/limited contents that can be standardised, where the essential characteristics and main elements of the contracts are not determined autonomously by the Company, but derive from regulatory provisions and agreements between the parties (Policyholder and Beneficiary).

– active portfolio management, through specific reform actions on the older positions, aimed at adapting the offer to customers by proposing more recent products that allow for more precise and sensitive pricing in relation to risk level variations.

To support tariff definition, particularly with regard to guarantees relating to natural catastrophes, the Group also makes use of the results of dedicated models recognised in the insurance industry, which, depending on the risk in question, also allow predictive analyses to be carried out, as well as, more generally, to use calculation models that rely on historical data on the frequency and average cost of claims. In each case, the Companies in scope monitor the ways in which climate change is evolving with respect to findings from historical data, as well as its possible impact on future trends and prospects.

5. Incorporating Adverse sustainability effects into the Non-Life underwriting processes

The Group acknowledges the important role of the insurance industry as an enabler of people, businesses and communities through the risk transfer process that supports its sustainability and business continuity.

The Group's commitment in this area is aimed, first and foremost, at supporting its customers to increase their awareness of the current or potential adverse effects on sustainability Factors generated by their own behaviour and, where possible, to make its know-how available to them (in the form of information, guidelines, tools, services) to support the prevention or reduction of such adverse effects.

Furthermore, the Unipol Group, by identifying the negative effects on sustainability produced or producible by potential contracting legal entities (taking into account the sector in which they operate and the management methods of their activities), contributes to a more informed appraisal of their correctness, soundness, and transparency. To this end, the Group is committed to progressively structuring and extending a due diligence approach to integrate the identification, assessment and monitoring of Adverse sustainability effects related to its business relationships into the underwriting process. This approach also makes it possible to identify any adverse effects on the reputation of the Group and the companies with respect to their stakeholders.

5.1. Classification, assessment and management of Adverse sustainability effects

The Group adopts a process to classify Adverse sustainability effects. This is done through the identification of potential adverse effects on sustainability Factors generated by its customers in relation to the different economic sectors they belong to and to the specific sustainability management approaches adopted by them.

Actual or potential Adverse sustainability effects may vary depending on the business sector in which the potential customer operates, the economic sectors it serves, the geographical area or countries of operation (in the case of multinational companies or companies that trade internationally), its characteristics, and other factors.

The classification of actual or potential Adverse sustainability effects is done through two types of instruments:

- a map of potential adverse effects related to different economic sectors, which is useful to give a general indication of the potential of each economic sector to generate Adverse sustainability effects;
- a set of indicators measuring phenomena related to the management of the company, the sector in which it operates and the territory in which the potential customer is located, aimed at monitoring the potential to generate Adverse sustainability effects.

The methodological framework adopted is based on the analysis and application of a wide variety of sources[4]. The Group also seeks to avoid entering into contractual relationships with parties that operate in a condition of:

- violation of human and workers' rights[5];
- exploitation of natural resources that does not take due account of their environmental impacts;
- systematic use of corruption and illegal practices in business management.

To this end, the Group has adopted **processes and tools aimed at supporting the assessment of current and potential Adverse sustainability effects in the underwriting process**, which are gradually being implemented in view of the gradual spread of awareness, at all levels and in all Group Companies, in a manner and timing proportionate to the size and relevance of the entities involved and the contractual transactions.

In particular, Unipol adopts appropriate measures, where applicable, to integrate the considerations of the negative impact on sustainability into the processes and strategies of its core Non-Life insurance business. The main measures in this regard are:

- the structuring of a **data-driven approach**, capable of integrating into the engagement process a summary assessment of the ESG performance of each customer, on the basis of which the compatibility or otherwise of the adverse effects (actual or potential) arising from the business relationship with the Group's sustainability approach and risk management objectives is defined; in the event of non-compatibility, the creation or continuation of the contractual relationship is excluded;
- the implementation of training and awareness-raising activities aimed at both internal structures and intermediaries, to support them in the application of these Guidelines and strengthen awareness of the role of Adverse sustainability effects.

Exclusions based on sustainability benefits do not apply in the case of underwriting products that **protect the employees of contracting legal entities in the event of illness and accident**, in view of the

[4] These include, by way of example, authoritative international sources such as the United Nations Global Compact (UN GC), United Nations Environment Programme Finance Initiative (UNEP FI), United Nations Principles for Sustainable Insurance (UN PSI); the methodologies and reports of rating agencies specialising in ESG performance; internal sources such as the Group's Emerging and Reputational Risk framework, sector analyses, media reports; and collaboration with non-governmental organisations on specific topics.

[5] For example, workplace conditions, gender or racial discrimination, child or forced labour in supply chains.

overall social role played by these protections. With regard to these products there are therefore no *a priori* exclusions in relation to the contracting company's field of operation.[6]

This is without prejudice to the underwriting of Non-Life insurance proposals where there is a regulatory obligation for the Companies to take out insurance.

On the basis of the Adverse sustainability effects classification adopted as described, the Group has identified a number of sectors to be excluded from its Non-Life underwriting activity, as well as a number of sensitive sectors that are given special attention in the ESG performance assessment process.

5.1.1 Excluded sectors

The following sectors should be regarded as excluded from Non-Life insurance underwriting[7]:

- companies that draw 30% or more of their revenues from coal mining or power generation from thermal coal, that do not demonstrate a sufficiently ambitious positioning in terms of business transition to a low-carbon economy;
- companies that adopt unconventional extraction practices (such as mountaintop removal, hydraulic fracturing – fracking –, tar sands, deep water drilling, shale gas and arctic drilling, and do not demonstrate a sufficiently ambitious positioning in terms of transition to a low-carbon economy;
- companies that develop and produce controversial weapons such as cluster munitions and submunitions, anti-personnel mines, chemical weapons, and biological weapons;
- companies that distribute and/or transport controversial weapons and/or weapons banned by international treaties to areas of conflict or civil war, or to countries perpetrating systematic human rights violations;
- commercial activities intended solely or predominantly for gambling (such as VLT rooms and the like).

5.1.2 Sensitive sectors

Sensitive sectors are considered to be given special attention in the ESG performance assessment process:

- **WASTE MANAGEMENT AND REMEDIATION ACTIVITIES**

  The waste management sector (including car wrecking – auto wrecking) is a very sensitive area, particularly in the Italian context, due to its particular exposure to current and potential Adverse sustainability effects. The Group supports companies operating in the sector in a compliant manner and with a view to mitigating adverse effects on climate and nature (with particular reference to the pollution of terrestrial and marine ecosystems).

- **CONSTRUCTIONS**

[6] Without prejudice to exclusions arising from regulatory requirements.

[7] With regard to the Credit and Surety lines, please refer to the guidelines contained in the Credit Policy.

The construction sector, which is of great importance for the development of the economic system as a driver of direct and indirect investments, presents sensitive aspects in all ESG areas (both environmental in terms of risks related to climate change and nature with regard to the use and pollution of soil and water resources, and social, as well as corporate governance), in relation to both large and small and very small players.

- **TRANSPORT AND STORAGE**

  The transport sector (air, land, sea), with its central role in ensuring the mobility of goods and people, has a high exposure to ESG issues, with particular reference to environmental matters, due to the sector's significant impact on overall emissions, and social matters, with reference to working conditions.

- **AGRICULTURE, ANIMAL FARMING, FORESTRY AND FISHING**

  The agricultural sector is of fundamental importance to society and the Group is committed to supporting and assisting it in the challenges it faces also in social and environmental terms, starting with those related to climate change as well as to the preservation of biodiversity and the protection of terrestrial and aquatic ecosystems.

- **TEXTILE AND LEATHER ACTIVITIES**

  The textile and leather sector is exposed to environmental risks (with particular reference to adverse effects on water resources), animal welfare risks, and risks related to the protection of workers' rights and safety.

6. Roles and responsibilities of the players involved

In order to achieve an effective control of risks and impacts relevant to Non-Life business underwriting with reference to ESG Factors, it is necessary that, at the Parent Company and the other Companies in scope, the relevant governance process is clearly and consistently established. The tasks and responsibilities of the corporate bodies and functions of the Parent Company and the other Companies in scope are defined below.

6.1. Board of Directors

The Board of Directors of the Parent Company, also in the exercise of its management and coordination activities with regard to the Companies in scope, approves – after review by the Control and Risk Committee, the Nominations, Governance and Sustainability Committee and the Group Risk Committee - within their respective areas of competence - these Guidelines, which define the framework for identifying, appraising, monitoring and managing Sustainability risks and adverse Sustainability effects related to underwriting decisions, and their subsequent amendments; it reviews reports on the evolution of Sustainability risks and adverse Sustainability effects at least once a year.

The Boards of Directors of the other Companies in scope, perform, for the aspects applicable thereto, in accordance with the specific industry regulations and business model and within the area of their responsibilities, the same activities as those performed by the Board of Directors of the Parent Company.

6.2. Control and Risk Committee of the Parent Company

The Parent Company's Control and Risk Committee[8] provides support, towards its Boards of Directors, in defining the guidelines of the internal control and risk management system in order to contribute to a sustainable success, so that the main business risks are correctly identified, as well as adequately measured, managed and monitored, in consistency with the Group's strategies.

The aforementioned Risk and Control Committee (i) supports the Board of Directors in defining the framework for identifying, appraising and managing Sustainability risks and adverse Sustainability effects related to underwriting decisions; (ii) reviews, also based on the Group Risk Committee's assessments, the proposals related to these Guidelines, which incorporate this framework, and their subsequent amendments, facilitating the Nominations, Governance and Sustainability Committee's evaluations from a perspective of coordination and synergy; (iii) reviews at least annually the reports on the evolution of Sustainability Risks and of the negative Impacts on sustainability.

6.3. Group Risk Committee

The Group Risk Committee reviews the contents of these Guidelines, including the framework for identifying, assessing, monitoring and managing Sustainability risks and adverse Sustainability effects related to underwriting decisions defined therein and their subsequent substantial amendments, and shares its observations with the Control and Risk Committee.

6.4. Nominations, Governance and Sustainability Committee of the Parent Company

The Parent Company's Nominations, Governance and Sustainability Committee performs a proposing, consultative, preparatory, and support function towards the relevant governing bodies on, inter alia, ESG issues, coordinating – for the aspects within their areas of competence – the guidelines, processes, initiatives, and activities aimed at overseeing and promoting the commitment of the company, and generally of the Group, in pursuit of Sustainable Success.

The aforementioned Nominations, Governance and Sustainability Committee reviews, in coordination with the Control and Risk Committee, where competent: (i) the contents of these Guidelines, including the framework for identifying, assessing, monitoring and managing Sustainability risks and adverse Sustainability effects related to underwriting decisions as defined therein, and any substantial subsequent amendments thereto, if they have not already been the subject of another resolution by their

[8] Pursuant to IVASS Regulation no. 38 of 3 July 2018, the Parent Company's Control and Risk Committee also acts on behalf of Group Companies featuring an 'enhanced' and 'ordinary' corporate governance.

respective governing bodies; reviews, at least once a year, the alerts on the evolution of Sustainability risks and adverse Sustainability effects.

6.5. Non-Life Business Functions

The Non-Life Business Functions of the Companies within scope ensure the implementation of these Guidelines in their underwriting and pricing activities; they review annual reports on the evolution of adverse Sustainability effects.

6.6. Sustainability Function of the Parent Company

The Parent Company's Sustainability Function monitors regulatory and strategic developments on sustainability in the financial and insurance sectors, also with regard to matters related to Non-Life underwriting activities, and, together with the Non-Life Business Functions, proposes and prepares amendments to the Guidelines.

The Parent Company's Sustainability Function supports the parties involved in the underwriting process for the implementation of the Guidelines. The Function shall also be called upon by the Non-Life Business Functions of the Companies in the event that, in the course of significant contractual transactions, for the Non-Life sector or for the Group as a whole, a company proves to be uninsurable according to the criteria set out in these Guidelines, but it is nevertheless assessed by the Non-Life Business Functions of the Companies (individually or jointly with the other business sectors) whether it is advisable to proceed with the underwriting, or whether further investigations are required.

The latter, if necessary with the involvement of the Risk Area, supports the Non-Life Business Functions in the required investigations, with the aim of proposing a solution consistent with the broader joint approach to mapping and assessing of processes, risks and controls on ESG factors adopted within the Group.

If the Departments involved deem it necessary, these cases may be submitted to the Group Risk Committee, which, in this context, is responsible for determining and assessing the concrete implications of ESG Factors in underwriting activities and defining choices consistent with the corporate vision in regard with the cases presented.

6.7. Risk Area of the Parent Company

The Parent Company's Risk Area, in conjunction with the Sustainability Function of the Parent Company, proposes, applies and updates the framework defined by the Guidelines with reference to the identification, assessment, monitoring, and management of Sustainability risks and adverse Sustainability effects (generated ESG risks).

6.8. Actuarial Function

The Actuarial Function includes Sustainability Risk considerations in its annual global underwriting policy opinion.

7. Reporting

The Parent Company's Sustainability Function monitors the implementation of the Guidelines with reference to the control of adverse Sustainability effects in the underwriting process, and shares once a year a summary report of the results with the Non-Life Business Functions. Every year the Board of Directors, the Parent Company's Nominations, Governance and Sustainability Committee and the Parent Company's Risk and Control Committee receive a alert prepared by the Parent Company's Sustainability Function on the monitoring of adverse effects in the underwriting processes and on any prevention and mitigation actions undertaken.

The results of the implementation of these Guidelines are included in the Group's annual reporting documents (Sustainability Report, as a section of the Integrated Consolidated Financial Statement).

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