

GENDER EQUALITY POLICY

1 January 2025

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1. Introduction

1.1. Document Objectives

The Gender Equality Policy (the “Policy”) defines the guidelines of the Unipol Group (the “Group”) for the enhancement and protection of diversity and equal opportunities in the workplace which should guide business processes and practices to create a collaborative, fair and inclusive work environment throughout the entire cycle of staff selection, management and development.

The Policy represents a component of the Group’s Gender Equality Management System (the “Management System”) suitable for obtaining Gender Equality Certification pursuant to the Equal Opportunities Code (the “Certification”). To this end, the Group Companies that intend to obtain the Certification define their own Strategic Plan on gender equality (the “Strategic Plan”) by establishing a management model that guarantees the maintenance of the defined requirements over time and that provides for measurement of the progress of the results through the preparation and monitoring of specific KPIs¹ to be reported in the documents of the Management System.

The Policy is applicable to employees, as well as to the resources involved in the selection processes and – with exclusive reference to par. 3.8. – to agents and suppliers who perform their activities for the Group Companies falling within the scope of par. 2.2. The Policy is the subject of specific training and awareness-raising courses, also aimed at company management.

It should be noted that, unless otherwise specified, the bodies/areas/departments/functions mentioned in the Policy should be understood as referring to those of Unipol Assicurazioni S.p.A. (“Unipol” or the “Parent Company”) and to the equivalent bodies/areas/departments/functions, where present, of the other Companies in scope, even if outsourced.

1.2. Approval and revision of the Policy

The Policy, drafted/revised with the involvement of all the company structures concerned in order to ensure a clear definition and sharing of objectives, roles and responsibilities, is approved by the Board of Directors of Unipol Gruppo S.p.A., also in exercising its management and coordination activities with respect to the Subsidiaries and in line with the business process on the preparation and validation of corporate policies.

Subsequently, the Boards of Directors of the Companies in scope (see par. 2.2), as part of their responsibilities on governance and the internal control and risk management system, evaluate and approve the Policy, insofar as it is applicable, in compliance with specific sector regulations and their business models.

The Policy will be updated and, if necessary, amended at least annually and, in any case, every time regulatory updates, changes to the context (significant changes to company processes, significant structural reorganisations), results of monitoring or checks require it.

¹ This refers to the KPIs – referred to in point 5 of the UNI/PdR 125:2022 reference practice – which constitute a key part of the information necessary to determine and explain how the Group progresses towards the pre-established objectives.

The Policy is communicated and made available by the Companies in scope to all personnel on the company intranet (or through suitable alternative communication channels), as well as to other interested parties, and is published on the website of the Companies in scope that intend to obtain the Certification.

2. Reference context

2.1. Internal and external regulatory references

The Policy was drafted in compliance with the regulations in force and the sector supervisory policies laid out below.

National and international regulations:

- Constitution of the Italian Republic:
 - Art. 3 'All citizens have equal social dignity and are equal before the law, without distinction of sex, race, language, religion, political opinion, personal and social conditions. It is the duty of the Republic to remove those obstacles of an economic or social nature which constrain the freedom and equality of citizens, thereby impeding the full development of the human person and the effective participation of all workers in the political, economic and social organisation of the country';
 - Art. 37 'Working women are entitled to equal rights and, for comparable jobs, equal pay as men. Working conditions must allow women to fulfil their essential role in the family and ensure appropriate protection for the mother and child';
- Italian Legislative Decree 198/2006 Code of equal opportunities between men and women ("Equal Opportunities Code");
- UN Conventions and Resolutions over time on the issue in question;
- the Principles of the United Nations Global Compact;
- The United Nations 2030 Agenda Sustainable Development Goals (SDGs);
- ILO (International Labour Organization) Conventions, which have succeeded each other over time;
- Directive (EU) 2023/970 of the European Parliament and of the Council of 10 May 2023 to strengthen the application of the principle of equal pay for equal work or work of equal value between men and women through pay transparency and enforcement mechanisms;
- Reference practice UNI/PdR 125:2022 'Guidelines on the management system for gender equality which provides for the structuring and adoption of a set of performance indicators (KPIs) inherent to gender equality policies in organisations'.

Internal regulations:

- 'Charter of Values and Code of Ethics', approved by Unipol's Board of Directors on 23 March 2017;

- Organisation, Management and Control Models adopted pursuant to Italian Legislative Decree 231/2001 by the main Group companies;
- Sustainability Policy.

2.2. Scope of application

This Policy is adopted by the Parent Company and the Group Companies with a registered office in Italy (hereinafter jointly referred to as the "Companies in scope").

The companies belonging to the Group with registered office outside of Italy adopt the principles and rules set forth in the Policy insofar as they are applicable and in compliance with their local regulatory environment and sector regulations.

2.3. Definitions and terminology

Budget	Planning of the activities of an organisation with a view to the achievement of certain objectives, with an allocation of the amount that has been decided to spend.
Development	Integrated system of activities through which personnel improve their skills and abilities and learn new ones.
Discrimination	Absence of equal opportunities and treatment, implemented following a judgement or classification.
Diversity	Approach aimed at developing awareness of social differences and their enhancement in all contexts.
Diversity, Equity and Inclusion Committee	Committee established at Group level by the Chief Executive Officer, who identifies its members, for the effective adoption and continuous application of the Gender Equality Policy.
Employees	Employees on the personnel register of the Company, as well as staff employed by the same and seconded by other Group Companies and staff working there on 'staff leasing' contracts.
Employees' health and safety management system	A set of principles, documents, procedures, actions and controls through which aspects relating to the health and safety of workers in the workplace and supplies are managed, and which provides for a monitoring and review process aimed at continuous improvement.
Equal opportunities	Absence of obstacles to the personal and professional growth and fulfilment of employees, as well as to the contribution to the Group's objectives for reasons related to gender, religion, personal beliefs, race, ethnic origin, disability, age, sexual or political orientation.
Fairness	Approach aimed at giving all people equal opportunities, breaking down all types of barriers that prevent access.

Gender bias	A rigid set of beliefs shared and socially transmitted on what are and should be the behaviour, role, occupations, traits and physical appearance of a person, in relation to his or her gender.
Gender equality	Condition in which people receive equal treatment with the possibility of accessing activities and opportunities regardless of gender.
Gender Equality Management System (“Management System”)	Set of interrelated or interacting elements (documents, tools, objectives, processes, actions, etc.) suitable to ensure the maintenance over time of the requirements defined by the reference practice on gender equality (UNI/PdR 125:2022).
Harassment	Unwanted behaviour with the purpose or effect of making a work environment offensive, humiliating or degrading.
Inclusion	Approach aimed at welcoming, respecting, supporting and empowering people, ensuring that everyone can fully express their diversity and participate in company life.
Insurance Group	Unipol Assicurazioni S.p.A. and its subsidiaries registered in the Register of Parent Companies pursuant to Art. 210-ter, par. 2 of the Private Insurance Code ² .
Key Performance Indicators (KPIs)	KPIs are used to monitoring the objectives established by the Gender Equality Policy and described in the Strategic Plan on Gender Equality.
Promotion	Move to a higher contractual or organisational level.
Remuneration	Amount of the total remuneration paid, of any ancillary components of the salary, also related to results bonuses, rewards and any other benefit paid to staff including on the basis of the collective agreements signed by the trade unions most representative at national level, in comparative terms, for the reference sector.
Selection	Process aimed at recruiting, selecting and integrating new resources into the organisation.
Strategic Plan on Gender Equality (“Strategic Plan”)	Formal document in which, for each topic identified by the Gender Equality Policy, simple, measurable, achievable, realistic, scheduled and clearly assigned objectives are defined. In addition, the document shows the monitoring frequencies of the KPIs defined therein.

² The parent company Register may be consulted on the IVASS website in the “Registers” section. The parent company and the associated subsidiaries are listed in the Register as (i) insurance and reinsurance undertakings (ii) ancillary services undertakings (iii) insurance holding companies and intermediate mixed financial holding subsidiaries.

Training	Process through which people acquire technical and managerial knowledge and skills, which enable the full performance of their role within the organisation.
Unconscious bias	Systematic inclination or distortion, at an unconscious level, towards certain ideas, people, groups or concepts, which can influence judgement or behaviour in an unfair or impartial way.
Unipol Group (Group)	Unipol Assicurazioni S.p.A. and its subsidiaries.
Values	Key elements of the culture of an organisation that strengthen the identity in the organisation itself, guide the conduct expected of the resources and, at the same time, make it stand out from all other organisations.

3. Guidelines for the enhancement and protection of gender equality

3.1. General Principles

The Group recognises the value of people by respecting their differences through a diversified approach to human resource management that ensures equal opportunities for professional growth.

The Group also promotes a culture of gender equality, fundamental to guaranteeing excellent performance based on merit and long-term sustainability. In this context, it promotes the achievement of gender balance and ensures internal decision-making processes that guarantee fairly valued and distributed leadership.

3.2. Selection and recruitment process

The Group adopts policies and processes aimed at attracting and hiring people with different backgrounds and abilities, pursuing gender equality in the selection and recruitment phase. At the same time, the Group recognises the importance of meritocracy: experience, skills and expertise guide our selection of the best candidates. In addition, the Group ensures that all people in the Human Resources area involved in the recruitment processes receive adequate training on gender equality, gender prejudices and unconscious bias, which can negatively impact the selection processes.

3.3. Personnel management and assessment model

The Group adopts a personnel management model that fosters dialogue between managers and employees, strengthening the commitment of each with respect to the objectives and challenges of the company and which guarantees a gender-neutral assessment of people.

It is the responsibility of the Human Resources area to ensure that personnel assessment is not affected by gender discrimination.

3.4. Training and communication

The Group promotes training and communication activities aimed at all personnel, with the aim of raising the organisation's awareness of the issues of valuing differences, gender equality and inclusion, as well as their impact on the business. The Group also promotes awareness-raising actions for all resource managers on issues related to gender bias, unconscious bias and the ability to

communicate in an inclusive manner. The fair involvement of women and men, in all initiatives and training courses, is guaranteed.

3.5. Enhancement of potential and career paths

The Group promotes a culture based on meritocracy and respect for people, regardless of gender. The Group ensures non-discrimination and equal opportunities in professional development processes and promotions, encouraging an adequate selection of candidates of the less-represented gender, with the aim of achieving gender balance in internal appointment processes and in managerial positions.

3.6. Definition of short- and medium-/long-term remuneration policies

The Group's Remuneration Policies contribute to the achievement of the mission, values and strategies of the company, by promoting actions and behaviours that correspond to the Group's culture, in compliance with the principles of plurality, equal opportunities, enhancement of people's knowledge and professionalism, fairness and non-discrimination envisaged by the Code of Ethics. Periodic remuneration measures, short- and long-term incentive systems and processes are linked to: the responsibilities assigned, the results achieved and the quality of the professional contribution, taking into account the context and the market references applicable for similar positions or for roles of a similar level in terms of responsibility and complexity. The Group works to ensure fairness and equal opportunities for access to the same remuneration, regardless of gender.

3.7. Management aspects related to work organisation

The Group promotes the improvement of the work-life balance of personnel in all phases of private and professional life, through organisation of work that is flexible, in accordance with the provisions of the existing level I and II collective agreements, not penalising and with times frames compatible with the assigned objectives. It also guarantees actions and programmes aimed at facilitating the management of care loads in the context of parenting and with respect to caregivers. In addition, it supports staff during and after leave periods, avoiding any discrimination.

3.8. Prevention of abuse and harassment and whistleblowing

The Group promotes measures to combat and prevent all forms of abuse and harassment in the workplace through dedicated awareness-raising courses that increase people's knowledge, providing guidance for their daily conduct and in the use of adequate vocabulary to ensure communication that it as neutral and respectful as possible. In addition, these measures are also considered as part of the risk assessment relating to the workplace health and safety management system.

Procedures are adopted that encourage and allow the reporting, including anonymously – guaranteeing the protection and confidentiality of the whistleblowers – of situations of:

- abuse or harassment (physical, verbal, digital);
- discrimination in the selection and recruitment phase;
- discrimination in terms of equal opportunities in professional development and promotions;

- failure to respect the rights of workers in the field of parenting and care;
- failure to respect the rights of workers in the area of work-life balance;
- pay inequality.

In this context, the Ethics Officer is responsible for receiving and managing reports.

3.9. Key performance indicators

The Group Companies that implement the Strategic Plan adopt a monitoring system to ensure that the various issues relating to gender equality are managed and developed in an adequate and progressive manner over time. The monitoring system is based on general and specific KPIs, which provide a representation of the achievement of the gender equality objectives established by the Policy and defined in the Strategic Plan.

4. Roles and responsibilities of the players involved

4.1. Board of Directors

The Parent Company's Board of Directors, also in exercising its management and coordination activities with regard to the companies in scope:

- approves this Policy and its subsequent amendments, on the proposal of the Chief Executive Officer and subject to the opinion of the Board of Statutory Auditors.

The Boards of Directors of the Companies in scope:

- approve this Policy – insofar as applicable, in compliance with the specific industry regulations and the business model – and its subsequent amendments.

4.2. Chief Executive Officer

The Chief Executive Officer:

- approves the Strategic Plan and ensures its implementation;
- approves the budget for the implementation of the Strategic Plan.

4.3. Board of Statutory Auditors

The Board of Statutory Auditors of the Parent Company examines this policy and expresses its opinion on the matter to the Board of Directors.

4.4. Diversity, Equity and Inclusion Committee

The Diversity, Equity and Inclusion Committee:

- defines the Policy and its updates, proposing them to the Chief Executive Officer for examination and approval by the Board of Directors;
- promotes and guarantees the effective adoption and application of the Policy at Group level;
- defines the Strategic Plan and the related budget and submits it to the Chief Executive Officer for approval;

- ensures the implementation of the commitments defined in the Strategic Plan, overseeing the monitoring of progress and the defined KPIs;
- defines actions for the improvement of the overall Management System, based on periodic reports on the monitoring of the Strategic Plan, ensuring its periodic review at least once a year;
- receives from the Ethics Officer, at least every six months (except in cases of particular seriousness when the report is made in a timely manner), a summary of any reports referred to in par. 3.8, which he or she also uses as elements to propose improvements to business processes.

4.5. Ethics Officer of the Parent Company

The Ethics Officer of the Parent Company:

- receives and manages the reports referred to in par. 3.8;
- provides the Diversity, Equity and Inclusion Committee, at least every six months, with a summary of any reports received.

4.6. Human Resources Area

The Human Resources area promotes and implements a modern and sustainable human resource management, training and development and work organisation model in line with the principles underlying this Policy.

4.7. The Diversity, Equity and Inclusion Function of the Parent Company

The Diversity, Equity and Inclusion Function of the Parent Company:

- prepares the draft of this Policy and any updates, as well as the Strategic Plan, in conjunction with all the company structures concerned, and proposes them to the Diversity, Equity and Inclusion Committee;
- activates, in conjunction with the company functions concerned, awareness-raising initiatives on diversity, equity and inclusion to spread an inclusive corporate culture, supervising actions and programmes aimed at recognising and enhancing individual differences and maximising people's potential;
- monitors the progress of the Strategic Plan and the defined KPIs, prepares periodic monitoring reports and sends them to the Diversity, Equity and Inclusion Committee for the relevant assessments;
- coordinates activities in preparation for the periodic review of the Management System in conjunction with the other functions of the Human Resources area;
- archives and updates the documentation relating to the Management System.

5.REPORTING

The Diversity, Equity and Inclusion Function of the Parent Company sends the Diversity, Equity and Inclusion Committee, at least annually, reports on the progress of the Strategic Plan and on the performance of the defined KPIs.

