

HUMAN RIGHTS GUIDELINES

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1. Introduction

The Unipol Group ("the Group") is aware of its responsibility to protect, respect and promote human rights and fundamental freedoms for all persons, regardless of gender, ethnicity, language, religion, age, sexual orientation, political and trade union membership, origin, disability or other personal conditions.

Fundamental rights and freedoms include civil rights, political rights, social and economic rights, cultural rights, minority rights, women's rights and the rights of vulnerable groups, such as children, persons with disabilities, persons with migrant backgrounds, persons subjected to discrimination, human trafficking and all forms of violence.

The Unipol Group is committed to acting in accordance with the Group Charter of Values and Code of Ethics and the Principles of the United Nations Global Compact, to which it adheres.

In compliance with Principles I and II of the Global Compact, whereby companies are required *"to promote and respect universally recognised human rights within their respective spheres of influence"* and *"not to be, even indirectly, complicit in human rights abuses"*, the Unipol Group undertakes to identify, where possible prevent, and mitigate, potential human rights violations directly or indirectly related to its activities in accordance with the highest international standards.

1.1. Document Objectives

The Human Rights Guidelines (the 'Guidelines'), which are annexed to and form an integral part of the Sustainability Policy, are part of the strategic approach to Sustainability that the Unipol Group adopts and which is articulated in a plurality of policies and commitments¹.

The aim of the Guidelines is to define and develop a structured approach on the subject, in order to identify, assess, manage and/or remedy human rights impacts in all their forms (the "Human Rights Impacts", as defined below), with a commitment to avoid directly causing, indirectly contributing to or being in any way connected with the generation of negative human rights impacts along Unipol's value chain, through the systematic application of the Guidelines themselves in a progressive manner and at every organisational and functional level of the Group.

1.2. Approval and revision of the Guidelines

These Guidelines are annexed to the Group Sustainability Policy and fully follow its approval, implementation, dissemination and revision processes. Their drafting and updating are carried out with the involvement of the relevant corporate structures, in order to ensure consistency, clarity and sharing of objectives, roles and responsibilities.

The Guidelines are approved by the Board of Directors of the Parent Company and, subsequently, by the Boards of Directors of the Companies falling within the scope of application in accordance with the governance model, the internal control system and the relevant regulations.

The Guidelines are communicated and made available in accordance with the procedures set out in the Sustainability Policy. The review is carried out with the same frequency and according to the criteria

¹ <https://www.unipol.com/it/sostenibilita/rendicontazione-performance-e-comunicazione/raccolta-delle-politiche>

established by the Sustainability Policy, also in line with regulatory, contextual or strategic developments.

2. Context and principles

2.1. Guiding Principles

The Guidelines reinforce and specify what is already stated in the Code of Ethics and the Group Sustainability Policy. The Group is committed to respecting and actively disseminating the principles laid down in Italian legislation governing the respect of fundamental human rights and the standards issued by relevant international organisations, including:

- the Universal Declaration of Human Rights and subsequent international conventions on civil and political rights and on economic, social and cultural rights;
- the UN Conventions on the Rights of Women, on the Elimination of All Forms of Racial Discrimination, on the Rights of the Child, and on the Rights of Persons with Disabilities;
- the Declaration on Fundamental Principles and Rights at Work and the eight Core Conventions of the International Labour Organisation (ILO);
- the United Nations Guiding Principles on Business and Human Rights ("*Ruggie Principles*");
- the OECD Guidelines for Multinational Enterprises;
- the United Nations 2030 Agenda for Sustainable Development;
- Directive (EU) 2019/882 of the Parliament and of the Council of 17 April 2019 on the accessibility requirements of products and services (*European Accessibility Act*);
- Legislative Decree no. 82 of 2022, which transposed the *European Accessibility Act* into Italian law.

In its direct activities and in relation to its value chain, the Group's commitment is to respect the principle that all persons are entitled to fundamental rights and freedoms, regardless of their nationality, gender, religion, race or any other status. To this end, the Group is engaged in several global initiatives to support the protection and development of human rights:

- **UN Global Compact (UNGC):** Unipol, as a member, undertakes to respect and disseminate the principles pursued by incorporating both the Universal Declaration of Human Rights and the ILO Core Labour and Human Rights Standards within its Code of Ethics, its Sustainability Policy and the Supplier Code of Conduct for Responsible Sourcing (the "CoCRS") adopted for sustainability issues related to suppliers. Joining the UN Global Compact entails public reporting, through the *Communication on Progress* (COP), of the support and promotion of its principles;
- **UNEP FI Principles for Sustainable Insurance (UNEP FI PSI) and UN Principles for Responsible Investment (UN PRI):** Unipol is a member of both initiatives, with the aim of fully integrating sustainability into business activities, as specified in the relevant "Guidelines for life business underwriting with reference to environmental, social and governance factors" ("ESG Life Guidelines") and "Guidelines for non-life business underwriting with reference to

environmental, social and governance factors" ("ESG Non-Life Guidelines"), as well as into investment activities, as specified in the "Guidelines for Responsible Investment Activities".

For each of these initiatives, specific targets and updates on the fulfilment of commitments are available at www.unipol.it.

2.2. Scope of application

The Guidelines are adopted by the Parent Company and its subsidiaries that fall within the Group's scope of consolidation (hereinafter the "Companies in scope"). This is without prejudice to the possibility for the Parent Company to identify, based on risk-based assessments and within the limits of compatibility with specific industry regulations, to which other companies to extend the Guidelines.

2.3. Definitions and terminology

The definitions contained in the Sustainability Policy, of which these Guidelines form an integral annex, apply in full to these Guidelines. The definitions below are in addition to those contained in the Policy.

Human Rights	Human rights are universal and are recognised to all human beings indiscriminately. In the Universal Declaration of Human Rights (the 'Declaration'), an international minimum standard for the protection of individual rights and freedoms is established. The nature of these fundamental provisions is such that they are now widely regarded as the basis of international law. The Declaration affirms the concept of equality, the right to life, liberty and security of one's person. It also regulates matters relating to the individual's right to respect for his or her private life and proclaims the right to social and economic security, as well as the social and cultural rights indispensable to his or her dignity and the free development of his or her personality.
Due diligence	The process through which businesses identify, prevent, mitigate, and account for how they address actual and potential negative impacts on the environment and people related to their activities. The impacts include negative effects linked to the company's own operations and its upstream and downstream value chain, including through its products, services, and business relationships.
Impacts or Impacts on Human Rights factors	The effects (including negative) that a company has or could have on human rights, as a result of the company's activities or business relations.
The United Nations Guiding Principles on Business and Human Rights (<i>Ruggie Principles</i>)	The Guiding Principles on Business and Human Rights are structured in three pillars: protect, respect and remedy. Each defines concrete and actionable steps for governments and companies to fulfil their respective

	duties and responsibilities to prevent human rights abuses in business operations and provide remedies if such abuses occur.
OECD Due Diligence Guidance for Responsible Business Conduct	Guide aiming to offer businesses practical support for the implementation of the OECD Guidelines for Multinational Enterprises.
Management system for supplier sustainability issues	Management model used to increase the awareness of Group suppliers of the sustainability impacts of their activities, as well as to evaluate their compliance with the UNGC requirements (this evaluation also takes place through the Suppliers Code of Conduct for responsible procurement, based on the UNGC principles and Standard ISO20400 ²).

3. The Group's commitment to identifying, preventing, mitigating and reporting on Human Rights impacts

Impacts on the Group's Human Rights can be (i) negative, such as the exploitation of workers, and be generated either through direct actions or by behaviour adopted by entities operating in the Group's Value Chain (such as supply chain companies, issuing companies in which investments are made and customers); or (ii) positive, such as the provision of innovative services that enable or facilitate people to exercise their rights (e.g. access to health).

In order to strengthen its ability to systematically monitor and manage current and potential negative Human Rights Impacts, the Group has adopted a due diligence approach. With reference to the UN Guiding Principles on Business and Human Rights, the "OECD Guidelines for Multinational Enterprises", the "OECD Due Diligence Guidance for Responsible Business Conduct" and the "Charter for Equal Opportunities and Equality at Work", Unipol has outlined a model for the planning and management of human rights due diligence activities, the key processes and commitments of which are outlined below.

4. Identifying and Assessing Impacts on Human Rights

The Unipol Group, in accordance with its Sustainability Policy, integrates Human Rights into its Group Risk and Impact management model.

Impacts and Risks related to Human Rights, together with other Impacts and Risks, are integrated within the Group's model for identifying, assessing and managing key Sustainability Risks and Impacts.

In particular, the identification and assessment of current and potential negative Impacts on Human Rights are the subject of a systematic, structured and periodically applied process, involving internal analytical tools and the integration of external sources to ensure broad and timely monitoring (the

² International standard on sustainable purchases launched by the International Standard Organisation (ISO), which defines the guidelines for the integration of sustainability in business procurement choices.

"identification and assessment process"). In the Group's Risk and Impact management model, based on commitments made through the Specific Risk and Impact Management Policies, **assessment procedures** are established that make it possible to systematically identify and analyse the potential to generate negative impacts on Human Rights within the Group and its value chain. Internally and along its Value Chain, in fact, the Group uses various analysis and listening tools (*whistleblowing*, reports made to the Ethics Officer, union communications, *data-driven* analysis systems) and involves multiple actors (including rights holders; actors operating along the Value Chain, such as suppliers, investees, customers; credible, independent and competent external information sources; ESG data and information providers) with whom it collaborates to identify potential Human Rights violations related directly to its own activities or indirectly through Value Chain actors.

The evaluation is intended to determine:

- the potential negative impacts on Human Rights and the way in which they occur, in all the activities subsequently described in the document;
- the efforts of the business model to mitigate or manage the risk of generating such impacts.

This process also allows the early identification of negative impacts actually generated on which a root cause assessment is carried out to avoid the recurrence of events with the same cause. Through these assessments, the Unipol Group then identifies priorities for action in terms of preventing and mitigating negative impacts on Human Rights that may be related to its operations and its products and services, depending on the severity and likelihood of the negative impact.

Although all areas are treated equally and the effort is geared towards identifying all potential violations, the Group focuses on Human Rights issues where it can have the greatest negative impact.

The resulting interventions are described below with reference to the different areas of impact (Chapter 5 of this document).

Relevant sustainability issues are also monitored synthetically via a KPI dashboard. The dashboard covers the different Sustainability issues identified in relation to each area, including those related to negative Impacts on Human Rights, direct or indirect, through both monitoring and listening indicators, integrating internal ("*Inside-out*") with external ("*Outside-In*") views. At least once a year, the Parent Company's Board of Directors is informed of the results of this monitoring.

5. Prevention and Mitigation of Negative Impacts on Human Rights

5.1. Direct impacts

Employees

The Unipol Group is committed to respect for the person and dignity of each employee, building a work environment in which professional qualities, moral integrity, the ability to cooperate and innovate are present, and supporting the development of each person, regardless of gender, age, sexual orientation, personal condition, geographic origin and religious belief, so that people can find adequate conditions of respect and well-being.

All employees are made aware of and receive training on the Code of Ethics and the Charter of Values.

The Procedure for Reporting Violations (so-called (*Whistleblowing*)) regulates the channels through which employees may transmit reports of unlawful conduct relevant under Legislative Decree 231/01, i.e. acts or facts that may constitute violations of the Organisation, Management and Control Model (OMM), as well as violations of other precisely defined internal regulations, in a manner that guarantees the full confidentiality of the identity of the reporter and the contents of the report.

To support the principles expressed in the Code of Ethics and the Charter of Values, as well as the commitments made in the Sustainability Policy, the Group has adopted corporate regulations that complement them and translate them into expected behaviour. Specifically, these are:

- Personnel Management Policy;
- Gender Equality Policy;
- Operational rule on reporting abuse or harassment;
- Internal arrangement on workers' health and safety management system;
- Operational rule on the selection of external non-managerial personnel for Group Companies;
- Personal data protection and exploitation policy;
- National Collective Agreements and Corporate Supplementary Agreements.

These documents are addressed, as far as applicable, to all the Group's activities and employees, in accordance with the regulatory framework of the country in which the company is located and the sector in which it operates, and are subject to periodic review.

The Group has long adopted a proactive model of dialogue with workers and trade unions that, within the framework of the National Collective Bargaining Agreements, is implemented in the Corporate Supplementary Agreements in force from time to time and in the numerous trade union agreements signed to manage the phases of evolution of the company. The following principles, interpreted in the light of the company context, are addressed in this context: the right to fair remuneration; freedom of association; freedom of trade unions and association in representative bodies of employees; combating illegal forms of child labour; safeguarding social security by ensuring an adequate contribution to supplementary pensions; and the right to family life through home-work reconciliation policies.

In line with the international principles, it refers to in its work on Human Rights, Unipol adopts the necessary safeguards to combat practices such as human trafficking, forced or compulsory labour and illegal forms of child labour.

The Unipol Group's further commitments towards workers are detailed in the Personnel Management Policy, to which we refer, made available on the intranet accessible to workers themselves.

Customers

The Group adopts a system of safeguards to ensure that, in its interactions with customers, their rights and personal integrity are respected and their safety is protected. Unipol also provides customers with a variety of access channels to facilitate communication with Group companies, and activates specific listening channels to solicit the expression of assessments on their relations with Group companies, as well as on the Group as a whole.

To this end, the Group has adopted the following corporate policies and regulations:

- Policy on the protection and use of personal data and further internal regulations on the subject;
- Policy on the development and responsible use of artificial intelligence systems;
- Complaint handling policy;
- Guidelines for advertising/communication relating to Unipol Assicurazioni's insurance products and supplementary pension schemes;
- Operational Rule on Reputational Risk Monitoring and Proactive Reputation Management.

Agents, intermediaries and collaborators

Without prejudice to the specific nature of the relations and relationships with Agents (as defined in the Sustainability Policy, of which these Guidelines form an integral part), intermediaries and collaborators³, the Unipol Group adopts towards them the same conduct as it does towards its own employees.

Agents are asked to adhere to the values by which the Group is inspired, by means of a formal declaration that they have read the Charter of Values and the Code of Ethics as well as the Organisation, Management and Control Models of the Companies in the scope that have them.

The Group, in its organisational relations with the sales network, is committed to clearly defining individual roles and responsibilities, guaranteeing equal opportunities for growth and development without discrimination of any kind, as well as sharing a culture of risk prevention and safety. The commitments undertaken by the Unipol Group also guarantee constant professional training and the rejection of any form of offence to human and labour dignity.

In its relations with the sales network, the Group promotes dialogue and ongoing confrontation by sharing information at all levels and through its autonomous representative organisations.

5.2. Indirect impacts

Customers

As a member of the UNEP FI PSI, the Group is committed to raising customers' awareness of environmental, social and governance issues, to manage risks and develop appropriate solutions, with a particular focus on not entering into contractual relationships with parties that operate under conditions that: (i) violation of human and workers' rights; (ii) exploitation of natural resources that does not take due account of their environmental impacts; (iii) systematic use of corruption and illegal practices in business management.

To this end, the Parent Company has defined "Guidelines for Non-Life Business" and "Life Business" underwriting activities with reference to environmental, social and governance factors, through which it

³ Collaborators are individuals who have collaborative relationships with the Companies in the scope in various capacities (consultants, lawyers, professionals in general).

also oversees potential negative impacts generated by customers, including those related to the non-respect of Human Rights, which have been implemented by the Group Companies concerned. In addition, with reference to the provision of payment services and the issuance of electronic money, safeguards have been defined to prevent the establishment of relations and exclude transactional movements with persons carrying out activities that generate significant impacts on Human Rights (e.g. trade in illegal arms, drug trafficking, illegal pornography, trafficking in human beings, etc.).

Investments

The Unipol Board of Directors has defined 'Guidelines for Responsible Investment Activities' for the Group, which support the identification and management of Sustainability Risks and Negative Sustainability Effects in the investment decision-making process. In this area, safeguards related to respect for Human Rights have been defined.

Agents

Unipol has defined a clear framework for managing relations with business partners, including in particular the sales network.

The relationship with the sales network is governed by the supplementary agreements in force from time to time and is oriented towards continuous comparison and compliance with shared principles of market conduct formalised in internal policies to ensure that customers are treated fairly and without discrimination.

To this end, Unipol, through its Insurance and Reinsurance Distribution Policy, has defined guidelines to ensure (i) compliance with professional and organisational requirements, including those of honourability, as well as (ii) the proper assumption and management of risks, compliance with rules of conduct and transparency of transactions, including in the case of distance selling, within the framework of direct distribution activities or those carried out through distribution networks by Unipol Group companies.

Suppliers and Business Partners

The Code of Conduct for Suppliers, inspired by the Global Compact Principles, outlines what the Unipol Group expects from its suppliers in the areas of human and labour rights protection, environmental protection and anti-corruption and provides - among other aspects - for the Group's right to monitor the supplier's processes and structures to verify their compliance, as well as to undertake sanction mechanisms in the event that the supplier persists in non-compliance with the CoCRS.

Controls are in place on suppliers regarding compliance with the CoCRS, including Human Rights aspects. The audit program, which involves suppliers selected on the basis of dependency/strategy criteria and exposure to direct and indirect ESG risks, makes it possible to highlight any areas of Human Rights risk related to the supply chain and to define the necessary mitigation actions accordingly.

Detailed information on the results of the supplier audit programme is published periodically in the annual reporting for the United Nations Global Compact (Communication on Progress - CoP), in the Unipol Consolidated Annual Report and in the Sustainability Report of Unipol Assicurazioni S.p.A., available in the "Archive – Sustainability" section of the Group's website.

Unipol Business Partners are required to make a formal declaration of acknowledgement of:

- Organisation, Management and Control Model (OMC);
- Code of Ethics and Charter of Values, which set out the principles that express the expected behaviour to prevent and counteract acts or initiatives that constitute any form of violation of human rights.

Unipol undertakes to disseminate these Guidelines appropriately so that they are known internally and externally by the various stakeholders.

6. Roles and responsibilities of the players involved

The roles and responsibilities for the approval and implementation of the Human Rights Guidelines **reflect those outlined in the Group's Sustainability Policy**, to which the Guidelines are attached. Approval of the Guidelines - including the objectives they set out and any subsequent updates - falls under the responsibility of the Board of Directors of the Parent Company and the relevant Group subsidiaries.

7. Reporting

The results achieved in the protection of Human Rights in terms of identified Risks and Impacts, evaluation activities and prevention and mitigation actions, monitoring methods, are reported, for the relevant parties, in the Sustainability Report contained in Unipol's Management Report, as well as in the pages dedicated to the theme of respect for Human Rights on the company's website.

The Sustainability Risks and Impacts – as defined in the Sustainability Policy – are monitored through a dashboard dedicated to KPIs prepared by the Parent Company's Risk Area, to assess the degree of risk associated with each of the three areas: environmental, social and governance. At least on an annual basis, the Board of Directors of the Parent Company is informed by the Parent Company's *Risk* Area, after consulting with the functions involved within the scope of their respective responsibilities.



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