



# Second-Party Opinion Generali Green, Social & Sustainability Bond Framework

## Evaluation Summary

Sustainalytics is of the opinion that the Generali Green, Social & Sustainability Bond Framework is credible and impactful and aligns with the Sustainability Bond Guidelines 2021, Green Bond Principles 2021 and Social Bond Principles 2023. This assessment is based on the following:



**USE OF PROCEEDS** The eligible categories for the use of proceeds<sup>1</sup> are aligned with those recognized by the Green Bond Principles and the Social Bond Principles. Sustainalytics considers that the eligible categories will lead to positive environmental and social impacts and advance the UN Sustainable Development Goals, specifically SDGs 3, 4, 7, 8, 9, 11, 13 and 15.



**PROJECT EVALUATION AND SELECTION** Generali's Sustainability Bond Committee is responsible for and monitoring the eligible green and social assets, which are initially evaluated by the accountable functions with the selected business areas. Generali has set up policies and guidelines to assess and mitigate the environmental and social risks of its activities. Eligible assets are subject to the Generali Group's ESG criteria integrated within its sustainable investment policies. Sustainalytics considers project evaluation and selection process in line with market practice.



**MANAGEMENT OF PROCEEDS** Generali will allocate an amount equivalent to the net proceeds to the eligible projects. Generali's Sustainability Bond Committee is responsible for tracking and managing allocations using its internal accounting systems. In case full allocation is not achieved at issuance, the Group intends to achieve full allocation within next year following the issuance. Pending full allocation, proceeds may be temporarily invested in accordance with Generali's investment guidelines in cash deposits, money market instruments, and socially responsible investments. This is aligned with market practice.



**REPORTING** Generali intends to report on allocation of proceeds and corresponding environmental and social outputs and impacts on an annual basis until full allocation. The annual report will be available on its website. Allocation reporting will include, amount of net proceeds, balance of unallocated proceeds at reporting end-period (if any), the share of financing versus refinancing, the amount of proceeds allocated to each eligible category, share of assets aligned with EU Taxonomy criteria and the amount allocated to various geographical regions. Generali also commits to report environmental and social impacts on each use of proceeds category level on a best-effort basis. Impact reporting will include impact metrics. Sustainalytics views Generali's allocation and impact reporting as aligned with market practice

## EU Taxonomy

Sustainalytics has assessed Generali Green, Social and Sustainability Bond Framework for alignment with the technical screening criteria for substantial contribution (SC) to the environmental objectives of the EU Taxonomy. The criteria defined in the Framework's use of proceeds categories map to 30 activities in the EU Taxonomy. Sustainalytics is of the opinion that, all 30 activities align with the applicable

<sup>1</sup> i) Green Buildings, ii) Renewable Energy, iii) Energy Efficiency, iv) Clean Transportation, v) Climate Adaptation, vi) Environmentally Sustainable Management of Living Natural Resources and Land Use, vii) Access to Essential Services, viii) Affordable Housing and ix) Employment Generation and Programmes designed to prevent and/or alleviate unemployment stemming from socioeconomic crises, climate transition projects and/or other considerations for a "just transition" (such provision and/or promotion could include SME financing and microfinance).

<sup>2</sup> This document was updated on 1 December 2025 to reflect minor revision to the composition of the Sustainability Bond Committee.

**Evaluation Date** December 22, 2023<sup>2</sup>

**Issuer Location** Trieste, Italy

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Technical Screening Criteria (TSC) in the EU Taxonomy. 114 activities align with the do no significant harm (DNSH) criteria of the EU Taxonomy, and all activities were assessed as aligned with the DNSH criteria. Sustainalytics is also of the opinion that the activities and projects to be financed under the Framework will be carried out in alignment with the EU Taxonomy's Minimum Safeguards.

## Introduction

Assicurazioni Generali SpA (“Generali” or the “Group”) is a global insurance and financial services company based in Italy. Founded in 1833, Generali now operates in over 50 countries with approximately 82,000 employees and is one of the world’s largest insurance providers by revenue.

Generali has developed the Generali Green, Social & Sustainability Bond Framework dated December 2023 (the “Framework”) under which it intends to issue green, social and sustainability bonds. The proceeds will be used to finance and refinance, in whole or in part, existing and future green and/or social projects within the European Union (EU), that advance the Group’s sustainability strategy, while mobilizing its stakeholders to support the transition to a more sustainable economy and society.

The Framework defines eligibility criteria in six green categories:

1. Green and Resilient Building
2. Renewable Energy
3. Energy Efficiency
4. Clean Transportation
5. Climate Adaptation Measures
6. Environmentally Sustainable Management of Living Natural Resources and Land Use

The Framework defines eligibility criteria in three social categories:

1. Access to Essential Services
2. Affordable Housing
3. Employment Generation and Programmes<sup>3</sup>

Generali engaged Sustainalytics to review the Framework and provide a Second-Party Opinion on the Framework’s environmental and social credentials and its alignment with the Sustainability Bond Guidelines 2021, the Green Bond Principles 2021 (GBP) and Social Bond Principles 2023 (SBP)<sup>4</sup>. Within the Second-Party Opinion, Sustainalytics has assessed the Green Eligible Categories for alignment with the EU Taxonomy. The Framework will be published in a separate document.<sup>5</sup>

### Scope of work and limitations of Sustainalytics’ Second-Party Opinion

Sustainalytics’ Second-Party Opinion reflects Sustainalytics’ independent<sup>6</sup> opinion on the alignment of the reviewed Framework with the current market standards and the extent to which the eligible project categories are credible and impactful.

As part of the Second-Party Opinion, Sustainalytics assessed the following:

- The Framework’s alignment with the Sustainability Bond Guidelines 2021, the Green Bond Principles 2021 and Social Bond Principles 2023, as administered by ICMA;
- The credibility and anticipated positive impacts of the use of proceeds;
- The use of proceeds criteria alignment with the EU Taxonomy 2021 Delegated Act & 2023 Delegated Act; and
- The alignment of the issuer’s sustainability strategy and performance and sustainability risk management in relation to the use of proceeds.

For the use of proceeds assessment, Sustainalytics relied on its internal taxonomy, version 1.15, which is informed by market practice and Sustainalytics’ expertise as an ESG research provider.

As part of this engagement, Sustainalytics held conversations with various members of Generali’s management team to understand the sustainability impact of their business processes and planned use of proceeds, as well as management of proceeds and reporting aspects of the Framework. Generali

<sup>3</sup> Employment Generation and Programmes designed to prevent and/or alleviate unemployment stemming from socioeconomic crises, climate transition projects and/or other considerations for a “just transition” (such provision and/or promotion could include SME financing and microfinance)

<sup>4</sup> The Sustainability Bond Guidelines, Green Bond Principles and Social Bond Principles are administered by the International Capital Market Association and are available at <https://www.icmagroup.org/sustainable-finance/the-principles-guidelines-and-handbooks>

<sup>5</sup> The Generali Green, Social & Sustainability Bond Framework will be available on Generali’s website at: <https://www.generali.com/investors/debt-ratings/sustainability-bond-framework>

<sup>6</sup> When operating multiple lines of business that serve a variety of client types, objective research is a cornerstone of Sustainalytics and ensuring analyst independence is paramount to producing objective, actionable research. Sustainalytics has therefore put in place a robust conflict management framework that specifically addresses the need for analyst independence, consistency of process, structural separation of commercial and research (and engagement) teams, data protection and systems separation. Last but not the least, analyst compensation is not directly tied to specific commercial outcomes. One of Sustainalytics’ hallmarks is integrity, another is transparency.

representatives have confirmed (1) they understand it is the sole responsibility of Generali to ensure that the information provided is complete, accurate and up to date; (2) that they have provided Sustainalytics with all relevant information and (3) that any provided material information has been duly disclosed in a timely manner. Sustainalytics also reviewed relevant public documents and non-public information.

This document contains Sustainalytics' opinion of the Framework, dated December 2023, and should be read in conjunction with that Framework.

Any update of the present Second-Party Opinion will be conducted according to the agreed engagement conditions between Sustainalytics and Generali.

Sustainalytics' Second-Party Opinion, while reflecting on the alignment of the Framework with market standards, is no guarantee of alignment nor warrants any alignment with future versions of relevant market standards. Furthermore, Sustainalytics' Second-Party Opinion addresses the anticipated impacts of eligible projects expected to be financed with bond proceeds but does not measure the actual impact. The measurement and reporting of the impact achieved through projects financed under the Framework is the responsibility of the Framework owner.

In addition, the Second-Party Opinion opines on the potential allocation of proceeds but does not guarantee the realised allocation of the bond proceeds towards eligible activities.

No information provided by Sustainalytics under the present Second-Party Opinion shall be considered as being a statement, representation, warrant or argument, either in favour or against, the truthfulness, reliability or completeness of any facts or statements and related surrounding circumstances that Generali has made available to Sustainalytics for the purpose of this Second-Party Opinion.

## Sustainalytics' Opinion

### Section 1: Sustainalytics' Opinion on the Generali Green, Social & Sustainability Bond Framework

Sustainalytics is of the opinion that the Generali Green, Social & Sustainability (GSS) Bond Framework is credible and impactful, and aligns with the four core components of the GBP and SBP. Sustainalytics highlights the following elements of Generali's GSS Bond Framework:

- Use of Proceeds:
  - The eligible categories Green Buildings, Renewable Energy, Energy Efficiency, Clean Transportation, Climate Adaptation Measures, Environmentally Sustainable Management of Living Natural Resources and Land Use, Access to Essential Services, Affordable Housing and Employment Generation and Programs are aligned with those recognized by the GBP and SBP.
  - Under the Framework, Generali primarily intends to issue bonds to and use the proceeds to finance or refinance, in whole or in part, existing and future projects within the European Union that meet the Eligibility Criteria as defined in the Framework.<sup>7</sup>
  - Under the Framework, Generali also intends to allocate the proceeds to equity investments, loans and tax credits for pure play companies.<sup>8</sup> Sustainalytics recognizes that the GBP favour project-based financing, which provides more transparency than non-project-based financing in general. Nevertheless, Sustainalytics recognizes that the financing of pure play companies through green bonds and loans is commonly accepted as an approach which can generate positive environmental impacts.
  - Under Green Building Category, Generali may finance or refinance the construction, maintenance, renovation, acquisition of residential or commercial buildings within EU in accordance with the following criteria:
    - Buildings built before 31 December 2020, that: i) belong to the top 15% of the national building stock based on primary energy demand (PED); or ii) receive an energy performance certificate (EPC) rating of A.

<sup>7</sup> Generali has communicated that envisages allocation towards a list of projects

<sup>8</sup> Pure play as defined by the Climate Bonds Initiative (CBI) Climate Bonds Releases Updated Green Bonds Methodology | Climate Bonds Initiative. The remaining 10% of turnover needs to be following the Exclusion Criteria indicated in the Framework. The Framework defines a pure play business as one that derives at least 90% of its revenue from one or more eligible categories described in the Use of Proceeds section.

- Buildings built after 31 December 2020 with PED at least 10% lower than National Nearly Zero-Energy Building (NZEB) requirements<sup>9</sup>.
  - Renovation of existing buildings that: i) leads to at least 30% reduction in PED compared to pre-renovation levels; or ii) fulfils the cost-optimal minimum energy performance requirements as defined by the Energy Performance of Building Directive (EPBD),<sup>10</sup> which varies among EU Member States. Therefore, Sustainalytics encourages Generali to report on the actual PED improvement or energy savings achieved in comparison with the existing building stock in the region.
  - Generali has communicated to Sustainalytics that in addition to the above-mentioned criteria for buildings, Generali will consider, on a best effort basis the following minimum certification levels: i) LEED Gold<sup>11</sup>; ii) BREEAM Excellent<sup>12</sup>; iii) any green building certification with equivalent performance recognized within EU countries. Generali will also consider, on a best effort basis, building compliant with CRREM (Carbon Risk Real Estate) decarbonization pathway. <sup>13</sup>Sustainalytics notes that it is a market expectation to specify all schemes and encourages the Group to report on any equivalent local green building certification it intends to include.
  - Additionally, Sustainalytics notes that the Framework excludes financing towards buildings that are used for the purpose of storage, extraction or manufacturing of fossil fuel.
  - Sustainalytics considers investments under this category to be aligned with market practice.
- Under Renewable Energy Category, Generali intends to finance or refinance the construction, operation, acquisition, installation and maintenance of renewable energy generation facilities, in accordance with the following criteria:
- On-shore and off-shore wind energy projects.
  - Photovoltaic and concentrated solar power (CSP) projects where at least 85% of the electricity is generated from solar energy sources.
  - Hydropower facilities are limited to: i) run-of-river plants without an artificial reservoir; ii) facilities with a power density of electricity generation above 5 W/m<sup>2</sup>; or iii) facilities with life cycle emissions lower than 100 gCO<sub>2</sub>e/kWh, in line with the EU Taxonomy substantial contribution criteria for climate change mitigation. Considering the longevity of hydropower assets, newly constructed facilities effectively lock in energy generation for a very extended period. Sustainalytics encourages Generali to favour newly constructed projects with emissions intensities below the 50 gCO<sub>2</sub>e/kWh threshold. For all new hydropower projects, an environmental impact assessment will be conducted by a credible body to ensure that no significant environmental and social risks, negative impacts or controversies have been identified.
  - Geothermal energy projects where the life cycle GHG emissions from the generation of electricity are lower than 100 gCO<sub>2</sub>e/kWh.
  - Bioenergy electricity generation projects from agriculture biomass with a life cycle emission intensity below 100 gCO<sub>2</sub>e/kWh.<sup>14</sup>
  - Cogeneration of heat/cool and power from agricultural biomass.<sup>15</sup>
  - Sustainalytics considers investments under this category to be aligned with market practice.
- Under the Energy Efficiency category, Generali may finance or refinance related to the development, installation, maintenance, or repair of energy efficiency equipment including the following:
- i) energy-efficient light sources such as LED; ii) buildings energy management systems (BEMS); iii) lighting control systems and energy management systems; iv) zoned and

<sup>9</sup> European Commission, “Nearly zero-energy buildings”, at: [https://ec.europa.eu/energy/topics/energy-efficiency/energy-efficient-buildings/nearly-zeroenergy-buildings\\_en](https://ec.europa.eu/energy/topics/energy-efficiency/energy-efficient-buildings/nearly-zeroenergy-buildings_en).

<sup>10</sup> European Commission, “Energy Performance of Buildings Directive”, at:

[https://energy.ec.europa.eu/topics/energy-efficiency/energy-efficient-buildings/energy-performance-buildings-directive\\_en](https://energy.ec.europa.eu/topics/energy-efficiency/energy-efficient-buildings/energy-performance-buildings-directive_en)

<sup>11</sup> LEED: <https://www.usgbc.org/leed>

<sup>12</sup> BREEAM: <https://bregroup.com/products/breem/>

<sup>13</sup> CRREM project at <https://www.crrem.eu/>

<sup>14</sup> Forest biomass used in the activity complies with the criteria laid down in Article 29, paragraphs 6 and 7, of that Directive and, the GHG emission savings from the use of biomass are at least 80 % in relation to the GHG saving methodology and the relative fossil fuel comparator set out in Annex VI to Directive (EU) 2018/2001.

<sup>15</sup> Ibid.

- smart thermostats, v) energy-efficient heating, ventilation and air conditioning (HVAC); vi) energy-efficient water heating systems;<sup>16</sup> and vii) replacement of existing windows and doors with more energy-efficient windows.
- On-site renewable energy technologies used in buildings, such as roof-top solar photovoltaic systems. Sustainalytics notes that eligibility criteria for renewable energy technologies are as stated in the Renewable Energy category.
  - Installation, maintenance and repair of charging stations for electric vehicles in buildings.
  - Energy storage systems such as battery packs and hydrogen energy storage to provide grid stabilization services and enable the integration of more renewable energy into the grid. The storage systems installed in the EU will align with the EU Taxonomy criteria as they will be part of the interconnected European system. Sustainalytics recognizes the critical need to expand utility-scale storage systems in order to enable the expansion of renewable energy, while also noting that the environmental benefit of storage systems depends on the carbon intensity of the grid to which they are connected, and that deploying such assets to carbon-intensive grids or associated systems may result in increased emissions intensity.
  - Transmission and distribution infrastructure. Generali confirmed to Sustainalytics that the electrical grid will must meet one of the following criteria specified in the EU Taxonomy Delegated Act:
    - more than 67% of newly enabled generation installed capacity in the system is below the emissions threshold of 100 gCO<sub>2</sub>e/kWh, measured on a life cycle basis in accordance with electricity generation criteria, over a rolling five-year period;
    - the average system grid emissions factor<sup>17</sup> is below the threshold value of 100 gCO<sub>2</sub>e/kWh, measured on a life cycle basis in accordance with electricity generation criteria, over a rolling five-year period.
    - the system is in the interconnected European system
  - Smart grid solutions intended for more efficient transmission and distribution of energy and monitoring of energy consumption. Generali has confirmed the exclusion of technologies and systems that are designed or intended to improve the energy efficiency of processes that are carbon-intensive (such as production processes in hard-to-abate industries) or are powered by fossil fuels. Generali has also confirmed that it will exclude the financing of transmission and distribution lines and smart grid solutions directly connected to fossil fuel power plants.
  - Sustainalytics considers investments under this category to be aligned with market practice.
- Under the Clean Transportation category, Generali intends to finance or refinance the purchase, rental, leasing, development, operation, maintenance and upgrades of zero direct emissions vehicles including the following:
- Zero direct emission vehicles for passenger and freight rail transport including battery electric vehicles and hydrogen and fuel cell vehicles.
  - E-bikes and e-scooters.
  - Related infrastructure dedicated to the operation of zero direct emission vehicles including electric charging points, electricity grid connection upgrades, hydrogen fueling stations and electric road systems (ERS).
  - Transportation infrastructure for passenger and freight rail transport. The investments may also include infrastructure dedicated to the operation of vehicles with zero tailpipe CO<sub>2</sub> emissions, electric charging points, electricity grid connection upgrades, hydrogen fueling stations or electric road systems (ERS). Generali has confirmed the exclusion of financing for parking facilities from the Framework.
  - Sustainalytics considers investments under this category to be aligned with market practice.
- Under the Climate Change Adaptation category, Generali may finance or refinance following climate adaptation activities:

<sup>16</sup> Generali has confirmed that it will exclude the financing of water heating systems powered by fossil fuels.

<sup>17</sup> Average emission factor calculated as the total annual emissions from power generation connected to the system, divided by the total annual net electricity production in that system.

- Planning, construction, extension, and operations of large-scale nature-based flood or drought management and coastal, transitional or inland aquatic ecosystem restoration measures contributing to preventing and protecting against flooding or droughts.
  - Restoration of wetlands.
  - Generali has confirmed that investments under this category will be supported by a vulnerability assessment to identify potential climate risks and an adaptation plan to address the risks identified by the vulnerability assessment.
  - Sustainalytics considers investments under this category to be aligned with market practice.
- Under the Environmentally Sustainable Management of Living Natural Resources and Land Use category, Generali may finance or refinance expenditures:
    - Sustainable Forestry projects that include afforestation<sup>18</sup> and reforestation activities such as the rehabilitation, conservation, restoration of forests, and natural forest regeneration after an extreme event.
    - Such projects shall have a sustainable forest management Plan as defined in national law and/or certified by relevant expert bodies, such as the Forest Stewardship Council (FSC)<sup>19</sup> or Programme for the Endorsement of Forest Certification (PEFC).<sup>20</sup> Sustainalytics notes that plant and tree species used for afforestation or reforestation will be native or well adapted to local conditions.
    - Sustainalytics considers investments under this category to be aligned with market practice.
  - Under the Access to Essential Services, Generali may finance or refinance investments related to healthcare, education and affordable housing as follows:
    - Construction, development, maintenance or renovation of public healthcare facilities which are accessible to all and provide services free of cost or at subsidized rate. Additionally, Generali may finance medical equipment and technologies for the benefit of public.
    - Activities that develop and maintain essential infrastructure and support for the elderly population such elder care facilities and retirement homes. Generali has confirmed to Sustainalytics that all facilities and services are accessible to the general population regardless of ability to pay.
    - Affordable education infrastructure and services such as schools, vocational training centres, re-skilling centers, training programs, financial literacy programs and related facilities. Generali has confirmed to Sustainalytics that all facilities and services are accessible to all regardless of ability to pay.
    - Sustainalytics considers investments under this category to be aligned with market practice.
  - Under the Affordable Housing category, Generali may finance or refinance construction and development of social housing real estate projects such as low-rent housing, affordable housing, cooperative housing with the goal of widening the availability of affordable basic infrastructure. Sustainalytics views this sub-category positively based on the clearly defined target population.<sup>21</sup>
  - Under the Employment Generation programme,<sup>22</sup> Generali may finance or refinance activities supporting micro-enterprises, small and medium enterprises (SMEs)<sup>23, 24</sup> and start-ups<sup>25</sup> that

<sup>18</sup> Establishment of forest through planting or deliberate seeding on land that, until then, was under a different land use, implies a transformation of land use from non-forest to forest, FAO Global Resources Assessment 2020. Terms and definitions (version of 4.6.2021), at: <http://www.fao.org/3/I8661EN/i8661en.pdf>.

<sup>19</sup> FSC, at: <https://anz.fsc.org/>

<sup>20</sup> PEFC, at: <https://pefc.org/for-business/supply-chain-companies/certify-your-construction-project>

<sup>21</sup> Low-income population is defined as per the low-income criteria defined by the relevant state where assets are located.

<sup>22</sup> Such programmes are designed to prevent and/or alleviate unemployment stemming from socio-economic crises, climate transition projects and/or other considerations for a 'just transition' (including SME financing and micro-finance)

<sup>23</sup> Generali has defined SMEs according to the European Commission whereby medium-sized companies are defined as <250 employees, with < EUR 50 million in turnover. See more, at: [https://ec.europa.eu/growth/smes/sme-definition\\_en](https://ec.europa.eu/growth/smes/sme-definition_en)

<sup>24</sup> the EU definition of micro-enterprise: fewer than 10 employees and an annual turnover (the amount of money taken in a particular period) or balance sheet (a statement of a company's assets and liabilities) below EUR 2 million. European Commission, "The new SME definition User guide and model declaration", at: <https://www.eusmecentre.org.cn/wp-content/uploads/2022/12/SME-Definition.pdf>

<sup>25</sup> Generali defines start-ups as an independent, organisation, which is younger than five years and is aimed at creating, improving and expanding a scalable, innovative, technology-enabled product with high and rapid growth.

meets any one of the following criteria: i) located in disadvantaged areas;<sup>26</sup> ii) at least 50% of ownership belongs to women entrepreneurs; or iii) at least 50% of ownership by first generation immigrants.

- Generali may support financing employment generation programs for target population such as low-income individuals/families<sup>27</sup>, marginalized or disadvantaged population who lose jobs due to climate transition or natural disasters.
  - Additionally, financing aimed at improving the economic growth and/or alleviating unemployment through the support of areas and populations affected by other considerations for a 'just transition' and/or health crisis that includes funds for well-being of affected populations and recovery, restoration of affected areas and supporting affected micro-enterprises, SMEs and start-ups.
  - Sustainalytics considers investments under this category to be aligned with market practice.
- Project Evaluation and Selection:
  - Generali has established a Sustainability Bond Committee to oversee the implementation and monitoring of the processes that govern the Framework including project evaluation and selection. The committee will meet on a semi-annual basis and led by the Head of Group Debt and Treasury. Members of the Committee will comprise representatives from various relevant departments including Group Risk Management, Group Cash and Capital Management, Corporate Sustainability and Social Responsibility, Group Investment Governance, Generali Real Estate, Group Integrated Reporting and Group Investor & Rating Agency Relations. The Committee reviews the pool of assets twice a year. In the event of a potential controversy, this will result in a project being temporarily or permanently removed from the list of eligible assets and replaced with new projects as necessary.
  - The Sustainability Bond Committee will assess and monitor the impacts of the potential investments and financings included in the pool of eligible assets at least on a yearly basis.
  - Generali has set up policies such as Sustainability Group Policy and Risk Management Group Policy to assess and mitigate the environmental and social risks of its activities. Eligible assets are subject to its sustainability investment policies of Group. These risk management policies are applicable to all lending decisions made under the Framework. For additional details, see Section 2. Based on the establishment of the Sustainability Bond Committee and the presence of environmental and social risk management processes, Sustainalytics considers this process to be in line with market practice.
- Management of Proceeds:
  - Generali will allocate an amount equivalent to the net proceeds to the eligible projects. Generali's Sustainability Bond Committee is responsible for tracking and managing allocations using its internal accounting systems.
  - In case full allocation is not achieved at issuance, the Group intends to achieve full allocation within next year following the issuance.
  - Pending full allocation, proceeds may be temporarily invested in accordance with Generali's investment guidelines in cash deposits, money market instruments, and socially responsible investments.
  - Based on the use of internal tracking systems and processes and the disclosure on the temporary use of proceeds, Sustainalytics considers this process to be in line with market practice.
- Reporting:
  - Generali commits to report on the allocation of proceeds and corresponding environmental and social impacts on an annual basis through an annual report until full allocation. The annual report will be available on its website.
  - Allocation reporting will include amount of net proceeds, balance of unallocated proceeds at reporting end-period (if any), the share of financing versus refinancing, the amount of proceeds allocated to each eligible category, share of assets aligned with EU Taxonomy criteria and the amount allocated to various geographical regions.

<sup>26</sup> Economically disadvantaged areas (e.g. GDP is below the national average, or unemployment rate is above the national average).

<sup>27</sup> Generali will follow the income criteria defined by the relevant state where assets are located (reference to national law).

- Generali also commits to report environmental and social impacts, on each use of proceeds category level on a best-effort basis. Impact reporting will include impact metrics such as estimated GHG emissions avoided, expected annual renewable energy generation (MWh), estimated energy saved, or number of hospitals and other healthcare facilities covered as defined in the Framework. For more information, refer to Appendix 4.
- Based on the commitment to both allocation and impact reporting, Sustainability considers this process to be in line with market practice.

### Alignment with Sustainability Bond Guidelines 2021, Green Bond Principles 2021 & Social Bond Principles 2023

Sustainability has determined that the Generali Green, Social & Sustainability Bond Framework aligns with the four core components of the GBP and SBP. For detailed information please refer to Appendix 2: GSS Bond/GSS Bond Programme External Review Form.

### Alignment with the EU Taxonomy

Sustainability has assessed each of the Framework's eligible green use of proceeds criteria against the relevant criteria in the EU Taxonomy and determined their alignment with each of the Taxonomy's three sets of requirements. The results of this assessment are as follows:

1. Technical Screening Criteria ("TSC")
  - The criteria defined in the six green categories of the Framework were mapped to 30 activities of the EU Taxonomy. 30 activities were assessed as aligned with the applicable SC criteria of the EU Taxonomy.
2. Do No Significant Harm ("DNSH") Criteria
  - A total of 114 individual DNSH criteria across all environmental objectives apply to the criteria defined in the Framework. The Framework criteria are aligned with all 114 individual DNSH criteria.
3. Minimum Safeguards
  - Based on a consideration of the policies and management systems applicable to Framework criteria, as well as the regulatory context in which financing will occur, Sustainability is of the opinion that the EU Taxonomy's Minimum Safeguards requirements will be met.
  - For Sustainability's assessment of alignment with the Minimum Safeguard see Section 2 below.

Table 1 provides an overview of the alignment of Generali's Framework with the TSC and DNSH criteria for the corresponding NACE activities in the EU Taxonomy

**Table 1: Summary of Alignment of Framework Criteria with the EU Taxonomy**

Framework Criterion	Alignment with Taxonomy Criteria		Alignment per EU Environmental Objective					
	SC	DNSH	Mitigation	Adaptation	Water	Circular Economy	Pollution	Eco-systems
7.1. Construction of new buildings	■	■	■	■	■	-	-	■
7.2 Renovation of existing buildings	■	■	■	■	■	■	■	-
7.7. Acquisition and ownership of buildings	■	■	■	■	-	-	-	-
4.1. Electricity generation using solar photovoltaic technology	■	■	■	■	■	■	-	■

4.2. Electricity generation using concentrated solar power (CSP) technology	■	■	■	■	■	■	-	■
4.3 Electricity generation from wind power	■	■	■	■	■	■	-	■
4.5 Electricity generation from hydropower	■	■	■	■	■	-	-	■
4.6 Electricity generation from geothermal energy	■	■	■	■	■	-	■	■
4.8. Electricity generation from bioenergy	■	■	■	■	■	-	■	■
4.9 Transmission and distribution of electricity	■	■	■	■	-	■	■	■
4.10 Storage of electricity	■	■	■	■	-	■	-	■
4.20. Cogeneration of heat/cool and power from bioenergy	■	■	■	■	■	-	■	■
3.1 Manufacture of renewable energy technologies	■	■	■	■	■	■	■	■
7.3 Installation, maintenance and repair of energy efficiency equipment	■	■	■	■	-	-	■	-
7.4 Installation, maintenance and repair of charging stations for electric vehicles in buildings (and parking spaces attached to buildings)	■	■	■	■	-	-	-	-
7.5 Installation, maintenance and repair of instruments and devices for measuring, regulation	■	■	■	■	-	-	-	-
7.6 Installation, maintenance and repair of renewable energy technologies	■	■	■	■	-	-	-	-
6.1 Passenger interurban rail transport	■	■	■	■	-	■	■	-
6.2 Freight transport services by road	■	■	■	■	-	■	■	-
6.3 Urban and suburban transport, road passenger transport	■	■	■	■	-	■	■	-
6.5 Transport by bikes, passenger cars and light commercial vehicles	■	■	■	■	-	■	■	-
6.6 Freight transport services by road	■	■	■	■	-	■	■	-
6.13 Infrastructure for personal mobility, cycle logistics	■	■	■	■	■	■	■	■
6.14 Infrastructure for rail transport	■	■	■	■	■	■	■	■
6.15 Infrastructure enabling low-carbon road transport and public transport	■	■	■	■	■	■	■	■
2.1 Restoration of wetlands	■	■	■	■	■	■	■	■

1.1 Afforestation	■	■	■	■	■	-	■	■
1.2 Rehabilitation and restoration of forests, including reforestation and natural forest regeneration after an extreme event	■	■	■	■	■	■	■	■
1.3 Forest management	■	■	■	■	■	■	■	■
1.4 Conservation forestry	■	■	■	■	■	■	■	■

Legend	
Aligned	■
Partially aligned	▣
Not aligned	☒
No applicable DNSH criteria for this Objective and/or Activity	-
Grey shading indicates the primary EU Environmental Objective	

## Section 2: Sustainability Strategy of Generali

### Contribution to Generali’s sustainability strategy

Sustainalytics is of the opinion that Generali demonstrates a commitment to sustainability through promoting the integration of ESG considerations into its investment process and its insurance businesses.<sup>28</sup>

Generali group joined the UN-convened Net-Zero Asset Owners Alliance<sup>29</sup> in 2020 with a commitment to transitioning its investment portfolio to Net Zero CO<sub>2</sub> emissions by 2050.<sup>30</sup> In line with this commitment, Generali has set a target to reduce its investment portfolio’s carbon intensity by 25% by 2024 compared to a 2019 baseline.<sup>31</sup> The Group has also set an intermediate target of aligning at least 30% of its real-estate portfolio with a 1.5°C trajectory according to the Carbon Risk Real Estate Monitor (CRREM) methodology<sup>32</sup> by 2024.<sup>33</sup> The Group has committed to allocating EUR 8.5 - 9.5 billion for green, social and sustainable investments between 2021 and 2025.<sup>34</sup> In addition, the Group has committed an investment of EUR 3.5 billion by 2025 to support the EU recovery in infrastructure, innovation and digitalization, SMEs, green housing, healthcare, and education facilities.<sup>35</sup>

In line with the commitments of Conference of the Parties on Climate Change, the Group updated its Climate Change Strategy in 2022 by focusing on applying the exclusion criteria for new investments. Generali excludes investments in fossil fuel operations such as oil and gas extracted through fracking and upstream operations in the Arctic and intends to gradually divest from companies in the coal sector by applying restrictive exclusion thresholds. Moreover, the Group has committed to phasing out investments in coal companies by 2030 for OECD countries and a full phase-out by 2040.<sup>36</sup> Additionally, Generali has contributed to sustainability finance initiatives together with international institutions and organizations. The Group has been a signatory to the

<sup>28</sup> Generali, “Responsible Investment Group Guideline”, at: [https://www.generali.com/doc/jcr:faeb6f3e-8913-407b-a743-53861d4bd8e3/lang:it/Responsible\\_Investment\\_Group\\_Guideline\\_.pdf](https://www.generali.com/doc/jcr:faeb6f3e-8913-407b-a743-53861d4bd8e3/lang:it/Responsible_Investment_Group_Guideline_.pdf)

<sup>29</sup> UN-Convened Net-Zero Asset Owner Alliance, at: <https://www.unepfi.org/net-zero-alliance/>

<sup>30</sup> Generali, “Generali joins United Nations-convened Net-Zero Asset Owner Alliance”, (2020), at: <https://www.generali.com/media/press-releases/all/2020/Generali-joins-United-Nations-convened-Net-Zero-Asset-Owner-Alliance>

<sup>31</sup> Generali, “Annual Report 2022”, at: [https://www.generali.com/doc/jcr:0fccff42-5078-4ead-a14c-1b0cf8f49368/Annual%20Integrated%20Report%20and%20Consolidated%20Financial%20Statements%202022\\_Generali%20Group\\_final\\_interactive.pdf/lang:en/Annual\\_Integrated\\_Report\\_and\\_Consolidated\\_Financial\\_Statements\\_2022\\_Generali\\_Group\\_final\\_interactive.pdf](https://www.generali.com/doc/jcr:0fccff42-5078-4ead-a14c-1b0cf8f49368/Annual%20Integrated%20Report%20and%20Consolidated%20Financial%20Statements%202022_Generali%20Group_final_interactive.pdf/lang:en/Annual_Integrated_Report_and_Consolidated_Financial_Statements_2022_Generali_Group_final_interactive.pdf)

<sup>32</sup> GRESB, “Carbon Risk Real Estate Monitor (CRREM)”, at: [https://www.gresb.com/nl-en/carbon-risk-real-estate-monitor-crrem/#:~:text=CRREM%20uses%20GHG%20emissions%20\(and,align%20with%20certain%20transition%20scenarios.](https://www.gresb.com/nl-en/carbon-risk-real-estate-monitor-crrem/#:~:text=CRREM%20uses%20GHG%20emissions%20(and,align%20with%20certain%20transition%20scenarios.)

<sup>33</sup> Generali, “Annual Report 2022”, at: [https://www.generali.com/doc/jcr:0fccff42-5078-4ead-a14c-1b0cf8f49368/Annual%20Integrated%20Report%20and%20Consolidated%20Financial%20Statements%202022\\_Generali%20Group\\_final\\_interactive.pdf/lang:en/Annual\\_Integrated\\_Report\\_and\\_Consolidated\\_Financial\\_Statements\\_2022\\_Generali\\_Group\\_final\\_interactive.pdf](https://www.generali.com/doc/jcr:0fccff42-5078-4ead-a14c-1b0cf8f49368/Annual%20Integrated%20Report%20and%20Consolidated%20Financial%20Statements%202022_Generali%20Group_final_interactive.pdf/lang:en/Annual_Integrated_Report_and_Consolidated_Financial_Statements_2022_Generali_Group_final_interactive.pdf)

<sup>34</sup> Ibid.

<sup>35</sup> Ibid.

<sup>36</sup> Generali, “Generali Group Strategy On Climate Change”, at: [https://www.generali.com/doc/jcr:32646e34-90ae-48b5-90c1-32b97b85cc68/Generali%20Group%20Strategy%20on%20Climate%20Change%20-%20Technical%20Note%20-%20ENG%202022.pdf/lang:en/Generali\\_Group\\_Strategy\\_on\\_Climate\\_Change\\_-\\_Technical\\_Note\\_-\\_ENG\\_2022.pdf](https://www.generali.com/doc/jcr:32646e34-90ae-48b5-90c1-32b97b85cc68/Generali%20Group%20Strategy%20on%20Climate%20Change%20-%20Technical%20Note%20-%20ENG%202022.pdf/lang:en/Generali_Group_Strategy_on_Climate_Change_-_Technical_Note_-_ENG_2022.pdf)

UN Global Compact since 2007, the Principles for Responsible Investments (PRI) since 2011 and the United Nations Environment Programme's Principles for Sustainable Insurance (PSI) since 2014.

With regard to its insurance business, Generali has been a founding member of the Net Zero Insurance Alliance since 2021 and has committed to achieving a net zero insurance portfolio by 2050.<sup>37</sup> To support its ambition, the Group defined a comprehensive methodology for measuring GHG emissions associated with its portfolio with the support of Partnership for Carbon Accounting Financials.<sup>38</sup>

Sustainalytics is of the opinion that the Generali Green, Social & Sustainability Bond Framework is aligned with the Group's overall sustainability strategy and initiatives and will further the Group's actions on its key sustainability priorities.

### Approach to managing environmental and social risks associated with the projects

Sustainalytics recognizes that the proceeds from the instruments issued under the Framework will be directed towards eligible projects that are expected to have positive environmental and social impacts. However, Sustainalytics is aware that such eligible projects could also lead to negative environmental and social outcomes. Some key environmental and social risks possibly associated with the eligible projects may include issues related to emissions, effluents and waste generated in construction; land use and biodiversity loss associated with large-scale infrastructure development; occupational health and safety, business ethics; and stakeholder engagement. While Generali has limited involvement in the implementation of specific projects that will be financed under the Framework, it is exposed to environmental and social risks through its financing portfolio.

Sustainalytics is of the opinion that Generali is able to manage and mitigate potential risks through the implementation of the following:

- Through its commitment to Environment and Climate Strategy, Generali has integrated environmental and climate aspects into insurance and investment products which includes conducting a due diligence process to ensure the management and mitigation of risks related to the protection and conservation of biodiversity, waste management, environmental pollution, consumption and circularity of resources, [occupational health and safety, and stakeholder management].<sup>39</sup> Additionally, Generali developed a group-level Environmental Management System (EMS) in accordance with ISO 14001 standard<sup>40</sup> and implemented it across most of the Group's companies, covering 42% of employees and 87.5% of total gross direct premiums.<sup>41</sup>
- Regarding risks related to biodiversity loss, waste management, emissions and effluents, Generali follows its group-level Sustainability Policy which includes guidelines for identifying and assessing ESG factors that may present risks and mitigating the negative impacts that Generali's corporate activities may have on various stakeholder groups.<sup>42</sup>
- Regarding occupational health and safety, Generali has in place a code of conduct which is applicable to its employees, contractors and relevant stakeholders. Generali follows all applicable health and safety laws and regulations in the regions where it operates as part of its commitment to providing its employees with a safe and healthy work environment.<sup>43</sup>
- Through its Integration Of Sustainability Into Investments And Active Ownership Group Guideline, Generali integrates sustainability factors such as environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters into its investment decisions.<sup>44</sup> Regarding business ethics, Generali's Code of Conduct,<sup>45</sup> also covers third parties working with the company, ensuring a healthy, safe and secure workplace and improvement of the circumstances of the communities in which it operates. Additionally, Generali has in place an Ethical Code for the suppliers of Generali Group to ensure its contract partners align with its policies while performing business and to ensure compliance with all the levels of the relevant supply chain.<sup>46</sup> Since

<sup>37</sup> Generali, "External commitments", at: <https://www.generali.com/sustainability/responsible-business/external-commitments>

<sup>38</sup> Generali, "Annual Report 2022", at:

[https://www.generali.com/doc/jcr:0fccff42-5078-4ead-a14c-](https://www.generali.com/doc/jcr:0fccff42-5078-4ead-a14c-1b0cf8f49368/Annual%20Integrated%20Report%20and%20Consolidated%20Financial%20Statements%202022_Generali%20Group_final_interactive.pdf/lang:en/Annual_Integrated_Report_and_Consolidated_Financial_Statements_2022_Generali_Group_final_interactive.pdf)

[1b0cf8f49368/Annual%20Integrated%20Report%20and%20Consolidated%20Financial%20Statements%202022\\_Generali%20Group\\_final\\_interactive.pdf/lang:en/Annual\\_Integrated\\_Report\\_and\\_Consolidated\\_Financial\\_Statements\\_2022\\_Generali\\_Group\\_final\\_interactive.pdf](https://www.generali.com/doc/jcr:0fccff42-5078-4ead-a14c-1b0cf8f49368/Annual%20Integrated%20Report%20and%20Consolidated%20Financial%20Statements%202022_Generali%20Group_final_interactive.pdf/lang:en/Annual_Integrated_Report_and_Consolidated_Financial_Statements_2022_Generali_Group_final_interactive.pdf)

<sup>39</sup> Generali, "Commitments to the environment and climate", at: <https://www.generali.com/sustainability/our-commitment-to-the-environment-and-climate>

<sup>40</sup> ISO 14001: <https://www.iso.org/iso-14001-environmental-management.html>

<sup>41</sup> Generali, "Environmental management system", at: <https://www.generali.com/sustainability/responsible-employer/environmental-management>

<sup>42</sup> Generali, "Sustainability Group Policy", at: <https://www.generali.com/info/download-center/policies>

<sup>43</sup> Generali, "Well being", at: <https://www.generali.com/sustainability/responsible-employer/well-being>

<sup>44</sup> Generali Group, "Integration Of Sustainability Into Investments And Active Ownership Group Guideline", at: [https://www.generali.com/doc/jcr:4403cc31-](https://www.generali.com/doc/jcr:4403cc31-2e9f-45e7-a2fc-351f79372c75/Integration%20of%20Sustainability%20into%20Investments%20and%20Active%20Ownership%20Guid...pdf/lang:en/Integration_of_Sust)

[2e9f-45e7-a2fc-351f79372c75/Integration%20of%20Sustainability%20into%20Investments%20and%20Active%20Ownership%20Guid...pdf/lang:en/Integration\\_of\\_Sust](https://www.generali.com/doc/jcr:4403cc31-2e9f-45e7-a2fc-351f79372c75/Integration%20of%20Sustainability%20into%20Investments%20and%20Active%20Ownership%20Guid...pdf/lang:en/Integration_of_Sustainability_into_Investments_and_Active_Ownership_Guid...pdf)

[ainability\\_into\\_Investments\\_and\\_Active\\_Ownership\\_Guid...pdf](https://www.generali.com/doc/jcr:4403cc31-2e9f-45e7-a2fc-351f79372c75/Integration%20of%20Sustainability%20into%20Investments%20and%20Active%20Ownership%20Guid...pdf/lang:en/Integration_of_Sustainability_into_Investments_and_Active_Ownership_Guid...pdf)

<sup>45</sup> Generali, "Code of Conduct", at: <https://www.generali.com/info/download-center/policies>

<sup>46</sup> Generali, "Ethical Code for the suppliers", at: <https://www.generali.com/info/download-center/policies>

2007, Generali has endorsed the 10 principles of the UN Global Compact, through which it seeks to align its strategies and operations with sustainable and socially responsible policies regarding human rights, labour, the environmental protection and anti-corruption.<sup>47</sup>

- Generali has a stakeholder engagement approach, which defines how the Group will engage in dialogue with relevant representatives from the communities in which business operations are conducted. This includes attending meetings with representatives of NGOs, institutions, and civil society associations. In addition, Sustainalytics is of the opinion that Generali is able to mitigate potential social risks through defined targeting as outlined in the Framework.<sup>48</sup>
- Generali has in place Responsible Investment Guidelines,<sup>49</sup> which are applicable to direct investments related to funds promoted or managed by the Generali Group. As part of these guidelines, the Group conducts analyses on the ESG policies, performance, practices and impacts in order to exclude or avoid enterprises with poor ESG practices, while also assessing and monitoring the investments that are exposed to ESG risks.<sup>50</sup> Moreover, the Group excludes high-risk investments in companies that engage in activities such as those involved in serious or systematic human rights violations and environmental damages.<sup>51</sup>

Based on these policies, standards and assessments, Sustainalytics is of the opinion that Generali has implemented adequate measures and is well positioned to manage and mitigate environmental and social risks commonly associated with the eligible categories.

#### Alignment with the EU Taxonomy's Minimum Safeguards

The EU Taxonomy recommends that companies have policies aligned with international and regional guidelines and regulations pertaining to human rights, labour rights, and combating bribery and corruption. Specifically, activities should be carried out in alignment with the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises. Additionally, companies should be in compliance with the International Labour Organisation's (ILO) declaration on Fundamental Rights and Principles at Work.

#### Human and Labour Rights

Generali has implemented the following policies and procedures regarding human rights:

- Generali commits to promoting human and labour rights among its employees and contractual partners through its group-wide policies and guidelines, which are in line with: i) the UN Universal Declaration of Human Rights; ii) the core international standards of the International Labour Organization; and iii) the UN Guiding Principles on Business and Human Rights. Such policies and guidelines include the following:
  - Generali established a Responsible Investment Group Guideline for its investments, asset and wealth management, under which the Group assesses relevant ESG factors including human rights towards the companies it invests in. Companies that are identified as involved in serious or systematic human rights or labour rights violations are either excluded from the financing or strictly monitored.<sup>52</sup>
  - Generali's Responsible Underwriting Group Guideline addresses general human and labour rights considerations related to its underwriting activities as well as relevant risks in ESG-sensitive sectors such as large hydroelectric plants and dams, fishing and livestock, and healthcare. As part of the guideline, the Group has established a process to identify and assess its clients who are involved in human and labour rights controversies followed by the implementation of necessary risk mitigation measures. In some cases, this could also include escalation of the underwriting decisions and reconsideration of the transactions.<sup>53</sup>

<sup>47</sup> Generali, "External commitments", at: <https://www.generali.com/sustainability/responsible-business/external-commitments>

<sup>48</sup> Generali, "Stakeholder engagement", at: <https://www.generali.com/sustainability/responsible-business/stakeholder-engagement>

<sup>49</sup> Generali, "Responsible Investment Guidelines", at: <https://www.generali.com/sustainability/responsible-investor>

<sup>50</sup> Ibid.

<sup>51</sup> Ibid.

<sup>52</sup> Generali, "Responsible Investment Group Guideline – Asset Owner", at:

[https://www.generali.com/doc/jcr:faeb6f3e-8913-407b-a743-53861d4bd8e3/Responsible%20Investment%20Group%20Guideline.pdf/lang:en/Responsible\\_Investment\\_Group\\_Guideline.pdf](https://www.generali.com/doc/jcr:faeb6f3e-8913-407b-a743-53861d4bd8e3/Responsible%20Investment%20Group%20Guideline.pdf/lang:en/Responsible_Investment_Group_Guideline.pdf)

<sup>53</sup> Generali, "Responsible Underwriting Group Guideline", at:

[https://www.generali.com/doc/jcr:006d5b90-ef90-4cb2-90ac-262af6f94fee/2021\\_Responsible%20Underwriting%20Group%20Guideline\\_website\\_final.pdf/lang:en/2021\\_Responsible\\_Underwriting\\_Group\\_Guideline\\_website\\_final.pdf](https://www.generali.com/doc/jcr:006d5b90-ef90-4cb2-90ac-262af6f94fee/2021_Responsible%20Underwriting%20Group%20Guideline_website_final.pdf/lang:en/2021_Responsible_Underwriting_Group_Guideline_website_final.pdf)

- Generali has in place a Code of Conduct and an Ethical Code for suppliers which highlight the Group's commitment to protecting human and labour rights, and preventing irregular work, exploitation, forced labour, child labour and any form of discrimination.<sup>54,55</sup>
- Generali has a monitoring procedure in place to screen the compliance of its contractual partners with the above-mentioned international principles. If any non-compliance is identified, Generali works with the contractual partner to find suitable solutions. In most severe instances, the Group takes necessary actions that could result in the termination of the contract.<sup>56</sup>
- In addition, Generali developed a whistleblowing process, as part of which the Group assigns independent specialists from its Compliance Function division to handle reports regarding possible violations through a confidential web platform.<sup>57</sup>

Based on the work of its research services, Sustainalytics evaluated the performance of Generali in the area of human rights, and has not detected involvement in any relevant controversies that would suggest that the above policies are not adequate in addressing key risks.

Sustainalytics is of the opinion that these measures appropriately safeguard minimum standards on human rights in relation to the activities of the Framework.

#### Anti-bribery and anti-corruption

Generali has implemented the following policies and procedures regarding anti-bribery and anti-corruption:

- Generali follows a zero-tolerance approach to all forms of bribery and corruption across the Group's operations, and implements compliance control on charitable donations and sponsorships. Generali's Code of Conduct and Ethical Code for suppliers set out the Group's basic principles for its employees and contractual partners regarding handling of conflicts of interest, undue payment, gifts, entertainment and other benefits.<sup>58,59</sup>
- The Group carries out continual training for its employees who are more likely to encounter corruption, with the aim of developing their skills to identify and manage activities potentially associated with corrupt practices. The trainings are primarily delivered through e-learning platforms in the form of dedicated meetings and courses.<sup>60</sup>
- Generali has also been a member of the UN Global Compact since 2007 and adheres to its principles related to anti-corruption.<sup>61</sup>

Based on the work of its research services and its ESG Risk Rating assessment, Sustainalytics evaluated the performance of Generali in the area of anti-bribery and anti-corruption, and has not detected involvement in any relevant controversies which would suggest that the above policies are not adequate in addressing key risks. Sustainalytics is of the opinion that these measures appropriately safeguard anti-bribery and anti-corruption in relation to the activities of the Framework.

Based on these policies, standards and assessments, Sustainalytics is of the opinion that Generali policies, guidelines and commitments are sufficient to demonstrate that the activities and projects to be financed under the Framework will be carried out in alignment with the EU Taxonomy's Minimum Safeguards.

<sup>54</sup> Generali, "Code of Conduct", (2019), at:

[https://www.generali.com/doc/jcr:1bfbf327-d13a-4dc0-8a96-977539135ca3/Charter%20of%20sustainability%20commitments.pdf/lang:en/Charter\\_of\\_sustainability\\_commitments.pdf](https://www.generali.com/doc/jcr:1bfbf327-d13a-4dc0-8a96-977539135ca3/Charter%20of%20sustainability%20commitments.pdf/lang:en/Charter_of_sustainability_commitments.pdf)

<sup>55</sup> Generali, "Ethical Code for suppliers of the Generali Group", at:

[https://www.generali.com/doc/jcr:16b0dd20-a8a8-4236-9b32-fafecee6909e/Codice%20Etico%20per%20i%20Fornitori%20del%20Gruppo%20Generali.pdf/lang:en/Codice\\_Etico\\_per\\_i\\_Fornitori\\_del\\_Gruppo\\_Generali.pdf](https://www.generali.com/doc/jcr:16b0dd20-a8a8-4236-9b32-fafecee6909e/Codice%20Etico%20per%20i%20Fornitori%20del%20Gruppo%20Generali.pdf/lang:en/Codice_Etico_per_i_Fornitori_del_Gruppo_Generali.pdf)

<sup>56</sup> As communicated to Sustainalytics by Generali.

<sup>57</sup> Generali's whistleblowing platform: <https://generali.whispli.com/speakup?locale=en>

<sup>58</sup> Generali, "Code of Conduct", (2019), at:

[https://www.generali.com/doc/jcr:1bfbf327-d13a-4dc0-8a96-977539135ca3/Charter%20of%20sustainability%20commitments.pdf/lang:en/Charter\\_of\\_sustainability\\_commitments.pdf](https://www.generali.com/doc/jcr:1bfbf327-d13a-4dc0-8a96-977539135ca3/Charter%20of%20sustainability%20commitments.pdf/lang:en/Charter_of_sustainability_commitments.pdf)

<sup>59</sup> Generali, "Ethical Code for suppliers of the Generali Group", at:

[https://www.generali.com/doc/jcr:16b0dd20-a8a8-4236-9b32-fafecee6909e/Codice%20Etico%20per%20i%20Fornitori%20del%20Gruppo%20Generali.pdf/lang:en/Codice\\_Etico\\_per\\_i\\_Fornitori\\_del\\_Gruppo\\_Generali.pdf](https://www.generali.com/doc/jcr:16b0dd20-a8a8-4236-9b32-fafecee6909e/Codice%20Etico%20per%20i%20Fornitori%20del%20Gruppo%20Generali.pdf/lang:en/Codice_Etico_per_i_Fornitori_del_Gruppo_Generali.pdf)

<sup>60</sup> Generali, "Anti-corruption", at: <https://www.generali.com/sustainability/our-rules/anti-corruption>

<sup>61</sup> Generali, "Anti-corruption", at: <https://www.generali.com/sustainability/our-rules/anti-corruption>

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### **Section 3: Impact of Use of Proceeds**

All eight use of proceeds categories are aligned with those recognized by the GBP or SBP. Sustainalytics has focused on two below where the impact is specifically relevant in the local context.

### Importance of financing green buildings in the EU

The buildings sector is the largest energy consumer in the EU,<sup>62</sup> accounting for approximately 40% of total energy consumption in the region. In 2021, the buildings sector was responsible for 36% of energy-related GHG emissions, with heating, cooling and domestic hot water usage representing 80% of total energy use.<sup>63</sup> In addition, approximately 85% of the buildings in the EU were built before 2001 and 75% of the building stock was energy inefficient as of 2022.<sup>64</sup>

The EU has set an objective of reducing 55% emissions by 2030, compared to 1990 levels.<sup>65</sup> To achieve this target, the EU would need to reduce GHG emissions from buildings by 60%, final energy consumption by 14%, and energy consumption from heating and cooling by 18% by 2030 compared to 2015.<sup>66,67</sup> The Energy Performance of Buildings Directive requires public buildings developed since 2019 and all new buildings constructed from 2021 onwards to be nearly zero-energy buildings (NZEB).<sup>68</sup> The latest version of the directive (EPBD IV) aims to achieve a zero-emission and fully decarbonized building stock by 2050. These initiatives aim to contribute to the EU's goal of a fully decarbonized building stock by 2050.<sup>69</sup> Furthermore, energy efficiency retrofits are expected to play an important role in decarbonizing the sector, with the renovation of existing buildings estimated to reduce the EU's total energy consumption by 5-6% and its total emissions by 5%.<sup>70</sup> In 2020, the European Commission developed the 'Renovation Wave Initiative' which aims to double the annual energy renovation rates by 2030.<sup>71</sup> The initiative requires each EU nation to publish a long-term building renovation strategy, and aims to stimulate volume and depth of renovation through regulatory and non-regulatory investments. The residential real estate sector accounts for two-thirds of buildings in the EU and the European Commission estimates that an additional investment of EUR 250 bn is required for residential buildings in order to meet EU targets of 55% GHG emission reduction by 2030.<sup>72</sup>

Based on the above, Sustainalytics believes that Generali's financing of green buildings is expected to contribute to achieving EU-wide decarbonization targets in the buildings sector.

### Importance of supporting access to essential services in the EU

Although Europe's prosperity appears to have increased for decades, structural inequalities in socio-economic conditions, such as income, health, educational attainment, and living conditions have been exacerbated by the global financial crisis and the COVID-19 pandemic.<sup>73</sup> The number of people aged 65 and over in EU countries is projected to increase significantly, from 90.5 million in 2019 to 129.8 million in 2050.<sup>74</sup> The ageing population will lead to increased demand for long-term care services. The number of people likely to need long-term care is estimated to increase by more than 8 million until 2050, but more than a third of older people in the EU do not have access to the care they need because of lack of affordability.<sup>75</sup> In line with the growing needs of ageing societies, spending on care for elderly as a share of GDP in EU countries is projected to increase from 1.7% to 2.5% between 2019 and 2050, but the public spending is not keeping up with the

<sup>62</sup> European Parliament, "Report on maximizing the energy efficiency potential of the EU building stock", (2020), at: [https://www.europarl.europa.eu/doceo/document/A-9-2020-0134\\_EN.html](https://www.europarl.europa.eu/doceo/document/A-9-2020-0134_EN.html)

<sup>63</sup> European Commission, "Factsheet - Energy Performance of Buildings", (2021), at: [https://ec.europa.eu/commission/presscorner/detail/en/fs\\_21\\_6691](https://ec.europa.eu/commission/presscorner/detail/en/fs_21_6691)

<sup>64</sup> European Climate Pact, "Every building can be green – here is how", (2022), at: [https://climate-pact.europa.eu/news/every-building-can-be-green-heres-how-2022-03-11\\_en](https://climate-pact.europa.eu/news/every-building-can-be-green-heres-how-2022-03-11_en)

<sup>65</sup> European Commission, "Stepping Up Europe's 2030 climate ambition", (2020), at: <https://eur-lex.europa.eu/legal-content/EN/TXT/?uri=CELEX:52020DC0562>

<sup>66</sup> European Environment Agency, "Greenhouse gas emissions from energy use in buildings in Europe", at: <https://www.eea.europa.eu/data-and-maps/indicators/greenhouse-gas-emissions-from-energy/assessment>

<sup>67</sup> European Commission, "A Renovation Wave for Europe - greening our buildings, creating jobs, improving lives", at: [https://ec.europa.eu/energy/sites/ener/files/eu\\_renovation\\_wave\\_strategy.pdf](https://ec.europa.eu/energy/sites/ener/files/eu_renovation_wave_strategy.pdf)

<sup>68</sup> European Commission, "Energy performance of buildings directive", at: [https://energy.ec.europa.eu/topics/energy-efficiency/energy-efficient-buildings/energy-performance-buildings-directive\\_en](https://energy.ec.europa.eu/topics/energy-efficiency/energy-efficient-buildings/energy-performance-buildings-directive_en)

<sup>69</sup> Ibid.

<sup>70</sup> European Commission, "Comprehensive study of building energy renovation activities and the uptake of nearly zero-energy buildings in the EU", (2019), at: [https://ec.europa.eu/energy/sites/ener/files/documents/1\\_final\\_report.pdf](https://ec.europa.eu/energy/sites/ener/files/documents/1_final_report.pdf)

<sup>71</sup> European Commission, "Renovation Wave", at: [https://ec.europa.eu/energy/topics/energy-efficiency/energy-efficient-buildings/renovation-wave\\_en](https://ec.europa.eu/energy/topics/energy-efficiency/energy-efficient-buildings/renovation-wave_en)

<sup>72</sup> European Commission, "A Renovation Wave for Europe - greening our buildings, creating jobs, improving lives", at: <https://eur-lex.europa.eu/legal-content/EN/TXT/HTML/?uri=CELEX:52020DC0662>

<sup>73</sup> Parliamentary Assembly of the Council of Europe, "Socio-economic inequalities in Europe: time to restore social trust by strengthening social rights", at: <https://assembly.coe.int/LifeRay/SOC/Pdf/TextesProvisoires/2021/20210909-SocialInequalities-EN.pdf>

<sup>74</sup> Eurostat, "Ageing Europe - statistics on population developments", at: [https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Ageing\\_Europe\\_-\\_statistics\\_on\\_population\\_developments#Older\\_people\\_E2.80.94\\_population\\_overview](https://ec.europa.eu/eurostat/statistics-explained/index.php?title=Ageing_Europe_-_statistics_on_population_developments#Older_people_E2.80.94_population_overview)

<sup>75</sup> European Commission, "Growing old in Europe: two new reports shed light on long-term care and pensions across the EU", at: <https://ec.europa.eu/social/main.jsp?langId=en&catId=752&newsId=10026&furtherNews=yes>

pace.<sup>76,77</sup> To tackle this situation, the European Care Strategy, put forward by the European Commission in September 2022, aims to help Member States to ensure high quality, affordable and accessible care services across the European Union, and to improve the situation of both those receiving care and those providing it, whether professionally or informally.<sup>78</sup>

The COVID-19 pandemic has led to an unprecedented need for health spending to build a more resilient health system across the EU. The EU has launched EU4Health, the fourth EU health programme, which will run from 2021 to 2027 and provide EUR 5.1 billion over the next seven years to improve and promote health in the region.<sup>79</sup> In education, while student attainment in EU countries is high by international standards, many EU education systems have become less successful in recent decades in ensuring that all students acquire the skills they need.<sup>80</sup> Moreover, educational poverty and inequalities have increased in EU countries over the last 15 years,<sup>81</sup> and these problems are exacerbated by the closure of schools, universities and other places of learning during the pandemic.<sup>82,83,84</sup> This loss of schooling in vulnerable communities is likely to affect student's overall health, social mobility, job prospects and life expectancy,<sup>85,86</sup> with Programme for International Student Assessment (PISA) results in Europe reflecting persistent performance gaps between wealthier and poorer students.<sup>87</sup>

Based on the above context, Sustainalytics considers that Generali's financing of projects aimed at improving access to universal and affordable essential services has a positive impact on achieving EU-wide targets.

### Contribution to SDGs

The Sustainable Development Goals were adopted in September 2015 by the United Nations General Assembly and form part of an agenda for achieving sustainable development by 2030. The instruments issued under the Framework are expected to help advance the following SDGs and targets:

Use of Proceeds Category	SDG	SDG target
Green Buildings	9. Industry, innovation and infrastructure	9.4 By 2030, upgrade infrastructure and retrofit industries to make them sustainable, with increased resource-use efficiency and greater adoption of clean and environmentally sound technologies and industrial processes, with all countries taking action in accordance with their respective capabilities.
	11. Sustainable Cities and Communities	11.6 By 2030, reduce the adverse per capita environmental impact of cities, including by paying special attention to air quality and municipal and other waste management.
Renewable Energy	7. Affordable and Clean Energy	7.2 By 2030, increase substantially the share of renewable energy in the global energy mix.

<sup>76</sup> European Commission, "The 2021 Ageing Report: Economic and Budgetary Projections for the EU Member States (2019-2070)", at: [https://economy-finance.ec.europa.eu/publications/2021-ageing-report-economic-and-budgetary-projections-eu-member-states-2019-2070\\_en](https://economy-finance.ec.europa.eu/publications/2021-ageing-report-economic-and-budgetary-projections-eu-member-states-2019-2070_en)

<sup>77</sup> Caritas Europa, "Europe's care systems at risk", at: <https://www.caritas.eu/europes-care-systems-at-risk/>

<sup>78</sup> Willy Palm et al. (2021), "Gaps in coverage and access in the European Union", Health Policy, at: <https://www.sciencedirect.com/science/article/pii/S0168851020303225#:~:text=Despite%20near%20universal%20population%20coverage,health%2C%20psychotherapy%20and%20new%20drugs>

<sup>79</sup> European Commission, "EU4Health programme 2021-2027 – a vision for a healthier European Union", at: [https://health.ec.europa.eu/funding/eu4health-programme-2021-2027-vision-healthier-european-union\\_en](https://health.ec.europa.eu/funding/eu4health-programme-2021-2027-vision-healthier-european-union_en)

<sup>80</sup> World Bank Group, "Education in the EU: Diverging Learning Opportunities?", (2022), at: <https://thedocs.worldbank.org/en/doc/180421529688002726-0080022018/original/EUGUSkillSupplyfinal5302018.pdf>

<sup>81</sup> Ibid.

<sup>82</sup> Ibid.

<sup>83</sup> UNESCO website, "Startling digital divides in distance learning emerge", at: <https://en.unesco.org/news/startling-digital-divides-distance-learning-emerge>

<sup>84</sup> The Conversation, "Coronavirus school closures impact 1.3 billion children.", (2022), at: <https://theconversation.com/coronavirus-school-closures-impact-1-3-billion-children-and-remote-learning-is-increasing-inequality-138656#:~:text=It%20will%20inevitably%20lead%20to%20a%20greater%20disparity,may%20do%20some%20a%20great%20injustice.%20Alternative%20approaches>

<sup>85</sup> European Commission, "The likely impact of COVID-19 on education: Reflections based on the existing literature and recent international datasets", (2020), at: <https://publications.jrc.ec.europa.eu/repository/bitstream/JRC121071/jrc121071.pdf>

<sup>86</sup> Social Europe, "Must try harder: recovering from educational inequality (2021)", at: <https://socialeurope.eu/must-try-harder-recovering-from-educational-inequality>

<sup>87</sup> World Bank Group, "Education in the EU: Diverging Learning Opportunities?", (2022), at: <https://thedocs.worldbank.org/en/doc/180421529688002726-0080022018/original/EUGUSkillSupplyfinal5302018.pdf>

Energy Efficiency	7. Affordable and Clean Energy	7.3 By 2030, double the global rate of improvement in energy efficiency.
Clean Transportation	11. Sustainable Cities and Communities	11.2 By 2030, provide access to safe, affordable, accessible, and sustainable transport systems for all, improving road safety, notably by expanding public transport, with special attention to the needs of those in vulnerable situations, women, children, persons with disabilities and older persons.
Climate Adaptation	13. Climate Action	13.1 Strengthen resilience and adaptive capacity to climate-related hazards and natural disasters in all countries.
Environmentally Sustainable Management of Living Natural Resources and Land Use	15. Life on Land	15.2 By 2020, promote the implementation of sustainable management of all types of forests, halt deforestation, restore degraded forests and substantially increase afforestation and reforestation globally.
Access to Essential Services	3. Good Health and Wellbeing	3.8 Achieve universal health coverage, including financial risk protection, access to quality essential health-care services and access to safe, effective, quality and affordable essential medicines and vaccines for all.
Affordable Housing	4. Quality Education	4.3 By 2030, ensure equal access for all women and men to affordable and quality technical, vocational and tertiary education, including university.
	11. Sustainable Cities and Communities	1.1 By 2030, ensure access for all to adequate, safe and affordable housing and basic services and upgrade slums.
Employment Generation and Programmes	8. Decent Work and Economic Growth	8.3 Promote development-oriented policies that support productive activities, decent job creation, entrepreneurship, creativity and innovation, and encourage the formalization and growth of micro-, small- and medium-sized enterprises, including through access to financial services.

### Conclusion

Generali has developed the Generali Green, Social & Sustainability Bond Framework under which it intends to issue green, social and sustainability bonds, and use of proceeds to finance projects in the following categories: Green Buildings, Renewable Energy, Energy Efficiency, Clean Transportation, Climate Adaptation, Environmentally Sustainable Management of Living Natural Resources and Land Use, Access to Essential Services, Affordable Housing and Employment Generation and Programmes. Sustainalytics considers that the eligible projects are expected to provide positive environmental and social impacts.

The Framework outlines a process for tracking, allocating and managing proceeds, and makes commitments to report on their allocation and impact. Sustainalytics believes that the Framework is aligned with the overall sustainability strategy of the Group, and that the use of proceeds will contribute to the advancement of the UN Sustainable Development Goals 3, 4, 7, 8, 9, 11, 13 and 15. Additionally, Sustainalytics is of the opinion that Generali has adequate measures to identify, manage and mitigate environmental and social risks commonly associated with the eligible projects.

Sustainalytics has assessed the Framework for its alignment with the technical screening criteria for substantial contribution (SC) to the environmental objectives of the EU Taxonomy. The criteria defined in the Framework's use of proceeds categories map to 30 activities in the EU Taxonomy. Sustainalytics is of the opinion that all 30 activities are aligned with the applicable SC criteria. 114 activities align with the do no significant harm (DNSH) criteria of the EU Taxonomy, and all activities were assessed as aligned with the DNSH criteria. Sustainalytics is also of the opinion that the projects to be financed under the Framework will be carried out in alignment with the EU Taxonomy's Minimum Safeguards.

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Based on the above, Sustainalytics is confident that Generali is well positioned to issue green, social and sustainable bonds and that the Framework is robust, transparent and in alignment with the four core components of the Green Bond Principles 2021 and Social Bond Principles 2023.

# Appendices

## Appendix 1: Approach to Assessing Alignment with the EU Taxonomy

Sustainalytics has assessed each of the eligible green use of proceeds criteria in the Framework against the criteria for the relevant NACE<sup>88</sup> activity in the EU Taxonomy. This appendix describes Sustainalytics' process and presents the outcome of its assessment of alignment with the Taxonomy's applicable Technical Screening Criteria (TSC) and Do No Significant Harm (DNSH) criteria. Sustainalytics' assessment involves two steps:

### 1. Mapping Framework Criteria to Activities in the EU Taxonomy

The initial step in Sustainalytics' assessment process involves mapping each criterion in the Framework to a relevant and applicable NACE activity in the EU Taxonomy. Note that each Framework criterion may be relevant and applicable to more than one NACE activity and vice versa. Sustainalytics recognizes that some Framework criteria relate to projects that do not map well to a NACE activity. In such cases, Sustainalytics has mapped to the NACE activity that is most relevant with respect to the primary environmental objective and impacts.

In some cases, the Framework criteria cannot be mapped to an activity in the EU Taxonomy, as some activities are not yet covered by the Taxonomy, and some categories which are traditionally included in green bonds may not be associated with a specific economic activity. While recognizing that financing projects in these areas may still have environmental benefits, Sustainalytics has not assessed these criteria for alignment.

The outcome of Sustainalytics' mapping process for {Generali} Framework is shown in Table 2 below.

### 2. Determining Alignment with EU Taxonomy Criteria

The second step in Sustainalytics' process is to determine the alignment of each criterion with relevant criteria in the EU Taxonomy. Alignment with the TSC and DNSH criteria is usually based on the specific criteria contained in the Generali's Framework and may in many cases (especially DNSH criteria) also be based on management systems and processes and/or regulatory compliance. To assess alignment with the EU Taxonomy's Minimum Safeguards Sustainalytics has conducted an assessment of policies, management systems and processes applicable to the use of proceeds, as well as examining the regulatory context in the geographical location in which the Generali will finance activities and projects. (This assessment is included in Section 2, above.)

In cases where the Framework criteria describe projects which are intended to advance EU environmental objectives other than Climate Mitigation or Climate Adaptation, the Taxonomy does not include relevant TSC. In these cases, Sustainalytics has assessed the activity for alignment with the DNSH criteria across all objectives.

Sustainalytics' detailed assessment of alignment is provided in Appendix 2.

Table 2: Framework mapping table

Framework Category	Framework Criterion (Eligible Use of Proceeds)	EU / NACE Activity	NACE Code	Primary EU Environmental Objective	Refer to Table
Green Buildings	Financings or refinancing new residential or commercial buildings	7.1 Construction of new buildings	F41.1, F41.2 and F43	Mitigation / Adaptation	3, 33
	Refurbishment of buildings	7.2 Renovation of existing buildings	F41 and F43	Mitigation / Adaptation	4, 34

<sup>88</sup> The EU Taxonomy is based on economic activities defined in NACE (Nomenclature des Activités Économiques dans la Communauté Européenne). The Taxonomy currently lists 70 economic activities which have been chosen due to their ability to substantially contribute to climate change mitigation or adaptation.

	Financings or refinancing new residential or commercial buildings	7.7 Acquisition and ownership of buildings	L68	Mitigation / Adaptation	5, 35
Renewable Energy (Electricity and Heat Production)	Solar energy	4.1 Electricity generation using solar energy	D35.11 and F42.22	Mitigation	6
	Solar energy, CSP Technology	4.2 Electricity generation using concentrated collar power (CSP) technology	D35.11 and F42.22	Mitigation	7
	Wind energy	4.3 Electricity generation from wind power	D35.11 and F42.22	Mitigation	8
	Hydropower	4.5 Electricity generation from hydropower	D35.11 and F42.22	Mitigation	9
	Geothermal energy	4.6 Electricity generation from geothermal energy	D35.11 and F42.22	Mitigation	10
	Bioenergy	4.8. Electricity generation from bioenergy	D35.11	Mitigation	11
	Transmission and distribution infrastructure and equipment	4.9 Transmission and distribution of electricity	D35.12, D35.13	Mitigation	12
	Energy Storage	4.10 Storage of electricity	No associated code	Mitigation	13
	Bioenergy	4.20. Cogeneration of heat/cool and power from bioenergy	D35.11 and D35.30	Mitigation	14
Energy Efficiency	Manufacturing of components related to RE technologies	3.1 Manufacture of renewable energy technologies	C25, C27 and C28	Mitigation	15
	Financings related to the development, installation, maintenance, or repair of energy efficiency equipment	7.3 Installation, maintenance and repair of energy efficiency equipment	F42, F43, M71, C16, C17, C22, C23, C25, C27, C28, S95.21, S95.22 and C33.12	Mitigation	16
	Installation, maintenance and repair of charging stations for electric vehicles in buildings and parking spaces attached to buildings	7.4 Installation, maintenance and repair of charging stations for electric vehicles in buildings (and parking spaces attached to buildings)	F42, F43, M71, C16, C17, C22, C23, C25, C27 and C28	Mitigation	17
	Improvement of energy efficiency of buildings and infrastructures via individual measures	7.5 Installation, maintenance and repair of instruments and devices for measuring, regulation and controlling energy performance of buildings	F42, F43, M71, C16, C17, C22, C23, C25, C27 and C28	Mitigation	18

	Renewable energy individual measures installed on-site	7.6 Installation, maintenance and repair of renewable energy technologies	F42, F43, M71, C16, C17, C22, C23, C25, C27 and C28	Mitigation	19
Clean Transportation	Passenger rail transport with zero direct (tailpipe) CO2 emissions	6.1 Passenger interurban rail transport	H49.10 and N77.39	Mitigation	20
	Freight rail transport with zero direct (tailpipe) CO2 emissions	6.2 Freight transport services by road	H49.20 and N77.39	Mitigation	21
	Electric passenger vehicles with zero direct (tailpipe) CO2 emissions	6.3 Urban and suburban transport, road passenger transport	H49.31, H49.3.9, N77.39 and N77.11	Mitigation	22
	Electric passenger vehicles with zero direct (tailpipe) CO2 emissions: e-bikes	6.5 Transport by bikes, passenger cars and light commercial vehicles	H49.32, H49.39 and N77.11	Mitigation	23
	Electric freight vehicles with zero direct (tailpipe) CO2 emissions	6.6 Freight transport services by road	H49.4.1, H53.10, H53.20 and N77.12	Mitigation	24
	Infrastructure dedicated to the operation of vehicles with zero tailpipe CO2 emissions: e-bikes	6.13 Infrastructure for personal mobility, cycle logistics	F42.11, F42.12, F43.21, F71.1 and F71.20	Mitigation	25
	Transportation infrastructure for passenger and freight rail transport	6.14 Infrastructure for rail transport	F42.12, F42.13, M71.12, M71.20, F43.21, and H52.21	Mitigation	26
	Infrastructure dedicated to the operation of vehicles with zero tailpipe CO2 emissions: electric charging points, electricity grid connection upgrades, hydrogen fuelling stations or electric road systems (ERS), e-bikes	6.15 Infrastructure enabling low-carbon road transport and public transport	F42.11, F42.13, F71.1 and F71.20	Mitigation	27
Climate Adaptation Measures	Restoration of wetlands	2.1 Restoration of wetlands	No associated code	Mitigation	28
Environmentally Sustainable Management of Living Natural Resources and Land	Financings of afforestation aimed at transforming land use from non-forest to forest	1.1 Afforestation	A2	Mitigation	29

Use (Sustainable Forestry)					
	Financings of rehabilitation, conservation, restoration of forests, including reforestation and natural forest regeneration	1.2 Rehabilitation and restoration of forests, including reforestation and natural forest regeneration after an extreme event	A2	Mitigation	30
	Financings of forest management	1.3 Forest management	A2	Mitigation	31
	Financings of rehabilitation, conservation, restoration of forests, including reforestation and natural forest regeneration	1.4 Conservation forestry	A2	Mitigation	32

## Appendix 2: Comprehensive EU Taxonomy Alignment Assessment

The tables below provide a detailed assessment of the alignment of the Framework criteria with the EU Taxonomy's TSC and DNSH criteria for the relevant NACE activities.

Table 3

Framework Activity assessed		Green Buildings	
EU Taxonomy Activity		7.1. Construction of new buildings	
Associated NACE Codes		F41.1, F41.2 and F43	
EU Technical Screening Criteria		Alignment with Technical Screening Criteria	
Mitigation	<p>Constructions of new buildings for which:</p> <ol style="list-style-type: none"> <li>1. The Primary Energy Demand (PED),<sup>89</sup> defining the energy performance of the building resulting from the construction, is at least 10 % lower than the threshold set for the nearly zero-energy building (NZEB) requirements in national measures implementing Directive 2010/31/EU of the European Parliament and of the Council.<sup>90</sup> The energy performance is certified using an as built Energy Performance Certificate (EPC).</li> <li>2. For buildings larger than 5000 m<sup>2</sup>,<sup>91</sup> upon completion, the building resulting from the construction undergoes testing for airtightness and thermal integrity,<sup>92</sup> and any deviation in the levels of performance set at the design stage or defects in the building envelope are disclosed to investors and clients. As an alternative; where robust and traceable quality control processes are in place during the construction process this is acceptable as an alternative to thermal integrity testing.</li> <li>3. For buildings larger than 5000 m<sup>2</sup>,<sup>93</sup> the life-cycle Global Warming Potential (GWP)<sup>94</sup> of the building resulting from the construction has</li> </ol>	<ol style="list-style-type: none"> <li>1. The Framework includes financing of residential and commercial buildings built after 31 December 2020 with PED at least 10% better than the threshold for NZEB in the local market. This is aligned with criteria 1.</li> <li>2. Generali confirmed to Sustainalytics that it will integrate criteria 2 elements in the building construction framework. Generali further confirmed that the Group will ensure fulfilment of these criteria as a part of its due diligence process and will require additional evidence on the presence of robust and traceable quality control processes for eligible projects under the Framework.</li> <li>3. Generali communicated to Sustainalytics that it will calculate the GWP once a building larger than 5000 m<sup>2</sup> is included in the portfolio</li> </ol> <p>Based on the above, Sustainalytics considers this activity to be aligned.</p>	Aligned

<sup>89</sup> The calculated amount of energy needed to meet the energy demand associated with the typical uses of a building expressed by a numeric indicator of total primary energy use in kWh/m<sup>2</sup> per year and based on the relevant national calculation methodology and as displayed on the Energy Performance Certificate (EPC).

<sup>90</sup> Directive 2010/31/EU of the European Parliament and of the Council of 19 May 2010 on the energy performance of buildings (OJ L 153, 18.6.2010, p. 13).

<sup>91</sup> For residential buildings, the testing is made for a representative set of dwelling/apartment types.

<sup>92</sup> The testing is carried out in accordance with EN13187 (Thermal Performance of Buildings - Qualitative Detection of Thermal Irregularities in Building Envelopes - Infrared Method) and EN 13829 (Thermal performance of buildings. Determination of air permeability of buildings. Fan pressurisation method) or equivalent standards accepted by the respective building control body where the building is located.

<sup>93</sup> For residential buildings, the calculation and disclosure are made for a representative set of dwelling/apartment types.

<sup>94</sup> The GWP is communicated as a numeric indicator for each life cycle stage expressed as kgCO<sub>2</sub>e/m<sup>2</sup> (of useful internal floor area) averaged for one year of a reference study period of 50 years. The data selection, scenario definition and calculations are carried out in accordance with EN 15978 (BS EN 15978:2011. Sustainability of construction works. Assessment of environmental performance of buildings. Calculation method). The scope of building elements and technical equipment is as defined in the Level(s) common EU framework for indicator 1.2. Where a national calculation tool exists, or is required for making disclosures or for obtaining building permits, the respective tool may be used to provide the required disclosure. Other calculation tools may be used if they fulfil the minimum criteria laid down by the Level(s) common EU framework (1: <https://susproc.jrc.ec.europa.eu/product-bureau/product-groups/412/documents>), see indicator 1.2 user manual.

	been calculated for each stage in the life cycle and is disclosed to investors and clients on demand.		
<b>DNSh Criteria</b>		<b>Alignment with DNSh Criteria</b>	
Climate change adaptation	Refer to the assessment set out in Appendix 3, Table 36		Aligned
Sustainable use and protection of water and marine resources	<p>Where installed, except for installations in residential building units, the specified water use for the following water appliances are attested by product datasheets, a building certification or an existing product label in the Union, in accordance with the technical specifications laid down in Appendix E to the Annex I of the Climate Delegated Act.</p> <ul style="list-style-type: none"> <li>a) wash hand basin taps and kitchen taps have a maximum water flow of 6 litres/min;</li> <li>b) showers have a maximum water flow of 8 litres/min;</li> <li>c) WCs, including suites, bowls and flushing cisterns, have a full flush volume of a maximum of 6 litres and a maximum average flush volume of 3,5 litres;</li> <li>d) urinals use a maximum of 2 litres/bowl/hour. Flushing urinals have a maximum full flush volume of 1 litre.</li> </ul> <p>To avoid impact from the construction site, demonstrate the activity complies with the criteria set out in Appendix 3 to the Annex I of the Climate Delegated Act.</p>	<p>1. Generali has communicated to Sustainalytics that as part of its due diligence process the Group adopts the Green Public Procurement Criteria for Sanitary Tapware<sup>95</sup> which specifies the maximum water flow of 6 and 8 litre/min for a) wash hand basin taps and kitchen taps and b) showers respectively. Further, Generali confirmed that the WCs and urinals will abide by water flow requirements. Generali also confirmed compliance with the EU Water Framework Directive (2000/60/EC).</p> <p>2. Refer to the assessment set out in Appendix 3, Table 37</p> <p>Based on the above, Sustainalytics considers this activity to be aligned.</p>	Aligned
Transition to a circular economy	At least 70 % (by weight) of the non-hazardous construction and demolition waste (excluding naturally occurring material referred to in category 17 05 04 in the European List of Waste established by Decision 2000/532/EC) generated on the construction site is prepared for reuse, recycling and other material recovery, including backfilling operations using waste to substitute other materials, in accordance with the waste hierarchy and the EU Construction and Demolition Waste Management Protocol. <sup>96</sup> Further confirm that operators limit waste generation in processes related to construction and demolition, in accordance with the EU Construction and Demolition Waste	Generali has communicated to Sustainalytics that the projects financed under the Framework are mostly located in the EU and comply with the relevant EU and national regulations. Italy's waste regulation is in compliance with the EU's Waste Framework Directive <sup>98</sup> which requires that preparation for reuse, recycling and other material recovery, including backfilling operations using waste to substitute other materials, of non-hazardous construction and demolition waste excluding naturally occurring material defined in category 17 05 04 in the list of waste to be increased to a minimum of 70 % by weight.	Aligned

<sup>95</sup> EU GPP Criteria for Sanitary Tapware, at: [https://susproc.jrc.ec.europa.eu/product-bureau/sites/default/files/contenttype/product\\_group\\_documents/1581682812/GPP\\_criteria\\_Final.pdf](https://susproc.jrc.ec.europa.eu/product-bureau/sites/default/files/contenttype/product_group_documents/1581682812/GPP_criteria_Final.pdf)

<sup>96</sup> EU Construction and Demolition Waste Protocol (]: [https://ec.europa.eu/growth/content/eu-construction-and-demolition-waste-protocol-0\\_en](https://ec.europa.eu/growth/content/eu-construction-and-demolition-waste-protocol-0_en)).

<sup>98</sup> European Commission, "Waste Framework Directive (WFD) - Directive (EU) 2018/851", at: <https://circular-cities-and-regions.ec.europa.eu/support-materials/eu-regulations-legislation/waste-framework-directive-wfd-directive-eu-2018851-0#:~:text=This%20is%20Directive%20%28EU%29%202018%2F851%20of%20the%20European,treated%20and%20managed%20at%20regional%20and%20local%20level.>

	<p>Management Protocol and taking into account best available techniques and using selective demolition to enable removal and safe handling of hazardous substances and facilitate reuse and high-quality recycling by selective removal of materials, using available sorting systems for construction and demolition waste.</p> <p>Building designs and construction techniques support circularity and in particular demonstrate, with reference to ISO 20887<sup>97</sup> or other standards for assessing the disassembly or adaptability of buildings, how they are designed to be more resource efficient, adaptable, flexible and dismantlable to enable reuse and recycling.</p>	<p>Generali has communicated to Sustainalytics that the construction projects will have a waste management in place that are in accordance with the EU Construction and Demolition Waste Management Protocol regarding limiting waste generation in processes related to construction and demolition. Generali has confirmed to Sustainalytics that building design and construction techniques are checked during due diligence and investment process.</p> <p>Based on the above, Sustainalytics considers this activity to be aligned.</p>	
<p>Pollution prevention and control</p>	<p>Building components and materials used in the construction comply with the criteria set out in Appendix 3 to the Annex I of the Climate Delegated Act.</p> <p>Building components and materials used in the construction that may come into contact with occupiers 99 emit less than 0,06 mg of formaldehyde per m<sup>3</sup> of material or component upon testing in accordance with the conditions specified in Annex XVII to Regulation (EC) No 1907/2006 and less than 0,001 mg of other categories 1A and 1B carcinogenic volatile organic compounds per m<sup>3</sup> of material or component, upon testing in accordance with CEN/EN 16516100 or ISO 16000-3:2011101 or other equivalent standardised test conditions and determination methods.</p> <p>Where the new construction is located on a potentially contaminated site (brownfield site), demonstrate that the site has been subject to an investigation for potential contaminants, for example using standard ISO 18400.102</p> <p>Measures are taken to reduce noise, dust and pollutant emissions during construction or maintenance works.</p>	<p>Generali has communicated to Sustainalytics that the financed building construction activities in Italy and other EU Member States will comply with the below European and national standards to mitigate noise, dust, and pollutant emissions during construction or maintenance works:</p> <ul style="list-style-type: none"> <li>▪ EU Directive on Environmental Impact Assessment in accordance with Directive 2011/92/EU can be assumed to be transposed into national regulation</li> <li>▪ EU Regulation 1907/2006 (Dec 2006) concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH)</li> <li>▪ CEN/TS 16516:2013 Construction products - Assessment of release of dangerous substances - Determination of emissions into indoor air"</li> </ul> <p>The Group further confirmed that the following criteria will be covered by its due diligence process:</p> <ul style="list-style-type: none"> <li>▪ Building components and materials used in the building renovation that may come into contact with occupiers will emit less than 0.001 mg of other categories 1A and 1B carcinogenic volatile organic compounds per m<sup>3</sup> of material or component upon testing in accordance with CEN/EN 16516 or ISO 16000-3:2011 or other equivalent standardised test conditions and determination methods</li> <li>▪ New construction located on a potentially contaminated site (brownfield site) will be subject to investigation for potential contaminants, such as using standard ISO 18400</li> <li>▪ Measures will be taken to reduce noise, dust and pollutant emissions during construction or maintenance works.</li> </ul>	<p>Aligned</p>

<sup>97</sup> ISO 20887:2020, Sustainability in buildings and civil engineering works - Design for disassembly and adaptability - Principles, requirements and guidance (]: <https://www.iso.org/standard/69370.html>).

<sup>99</sup> Applying to paints and varnishes, ceiling tiles, floor coverings, including associated adhesives and sealants, internal insulation and interior surface treatments, such as those to treat damp and mould.

<sup>100</sup> CEN/TS 16516: 2013, Construction products - Assessment of release of dangerous substances - Determination of emissions into indoor air.

<sup>101</sup> ISO 16000-3:2011, Indoor air – Part 3: Determination of formaldehyde and other carbonyl compounds in indoor air and test chamber air – Active sampling method (]: <https://www.iso.org/standard/51812.html>)

<sup>102</sup> ISO 18400 series on Soil quality – Sampling.

		<p>Generali confirmed to Sustainalytics that in accordance to guidance from Italy’s Directorate of General Health, the due diligence process checks if the formaldehyde is below 0.05 mg/m<sup>3</sup>.</p> <p>Based on the above, Sustainalytics considers this activity to be aligned.</p>	
Protection and restoration of biodiversity and ecosystems	<p>The activity complies with the criteria set out in Appendix 3 to Annex I of the Climate Delegated Act.</p> <p>The new construction is not built on one of the following:</p> <ul style="list-style-type: none"> <li>a) arable land and crop land with a moderate to high level of soil fertility and below ground biodiversity as referred to the EU LUCAS survey;<sup>103</sup></li> <li>b) greenfield land of recognised high biodiversity value and land that serves as habitat of endangered species (flora and fauna) listed on the European Red List<sup>104</sup> or the IUCN Red List;<sup>105</sup></li> <li>c) land matching the definition of forest as set out in national law used in the national greenhouse gas inventory, or where not available, is in accordance with the FAO definition of forest.<sup>106</sup></li> </ul>	<p>Generali has communicated to Sustainalytics that a due diligence process in place which ensures that a new construction will not be built on the following land as defined in the EU Taxonomy:</p> <ul style="list-style-type: none"> <li>a) arable land and crop land with a moderate to high level of soil fertility and below ground biodiversity as referred to the EU LUCAS survey;</li> <li>b) greenfield land of recognised high biodiversity value and land that serves as habitat of endangered species (flora and fauna) listed on the European Red List or the IUCN Red List;</li> <li>c) land matching the definition of forest as set out in national law used in the national greenhouse gas inventory, or where not available, is in accordance with the FAO definition of forest.</li> </ul> <p>Generali has further communicated to Sustainalytics that it will not finance companies or projects that have negative impact on UNESCO World Heritage Sites, wetlands according to the Ramsar Convention 6, IUCN protected areas, categories I to VI. The Group will comply with the national and supranational regulations to mandate environmental impact assessment (EU Directive on EIA in accordance with Directive 2011/92/EU, and Legislative Decree 152/2006)</p> <p>Based on the above, Sustainalytics considers this activity to be aligned.</p>	Aligned

Table 4

<b>Framework Activity assessed</b>	Green Buildings
<b>EU Taxonomy Activity</b>	7.2. Renovation of existing buildings
<b>Associated NACE Codes</b>	F41 and F43
<b>EU Technical Screening Criteria</b>	<b>Alignment with Technical Screening Criteria</b>

<sup>103</sup> JRC ESDCA, LUCAS: Land Use and Coverage Area frame Survey : <https://esdac.jrc.ec.europa.eu/projects/lucas>

<sup>104</sup> IUCN, The IUCN European Red List of Threatened Species : <https://www.iucn.org/regions/europe/our-work/biodiversity-conservation/european-red-list-threatenedspecies>).

<sup>105</sup> IUCN, The IUCN Red List of Threatened Species : <https://www.iucnredlist.org>).

<sup>106</sup> Land spanning more than 0,5 hectares with trees higher than five meters and a canopy cover of more than 10 %, or trees able to reach those thresholds in situ. It does not include land that is predominantly under agricultural or urban land use, FAO Global Resources Assessment 2020. Terms and definitions. : <http://www.fao.org/3/I8661EN/i8661en.pdf>).

Mitigation	The building renovation complies with the applicable requirements for major renovations. <sup>107</sup>  Alternatively, it leads to a reduction of primary energy demand (PED) of at least 30 %. <sup>108</sup>	Based on the Framework criteria, Generali finances building renovations that: i) results in a relative reduction in PED of at least 30% in comparison to the performance of the building before the renovation; or ii) renovation that meet the criteria for major renovations. Hence, Sustainalytics considers this activity to be aligned.	Aligned
<b>DNSH Criteria</b>		<b>Alignment with DNSH Criteria</b>	
Climate change adaptation	Refer to the assessment set out in Appendix 3, Table 36		Aligned
Sustainable use and protection of water and marine resources	Where installed as part of the renovation works, except for renovation works in residential building units, confirm that the specified water use for the following water appliances is attested by product datasheets, a building certification or an existing product label in the Union, in accordance with the technical specifications laid down in <a href="#">Appendix E</a> to the Annex I of the Climate Delegated Act.:  a) wash hand basin taps and kitchen taps have a maximum water flow of 6 litres/min;  b) showers have a maximum water flow of 8 litres/min;  c) WCs, including suites, bowls and flushing cisterns, have a full flush volume of a maximum of 6 litres and a maximum average flush volume of 3,5 litres;  d) urinals use a maximum of 2 litres/bowl/hour. Flushing urinals have a maximum full flush volume of 1 litre.	1. Generali has communicated to Sustainalytics that as part of its due diligence process the Group adopts the Green Public Procurement Criteria for Sanitary Tapware which specifies the maximum water flow of 6 and 8 litre/min for a) wash hand basin taps and kitchen taps and b) showers respectively.  Further, Generali confirmed that the WCs and urinals will abide by water flow requirements. Generali also confirmed compliance with the EU Water Framework Directive (2000/60/EC).  Based on the above, Sustainalytics considers this activity to be aligned.	Aligned
Transition to a circular economy	At least 70 % (by weight) of the non-hazardous construction and demolition waste (excluding naturally occurring material referred to in category 17 05 04 in the European List of Waste established by Decision 2000/532/EC) generated on the construction site is prepared for reuse, recycling and other material recovery, including backfilling operations using waste to substitute other materials, in accordance with the waste hierarchy and the EU Construction and Demolition Waste Management Protocol. <sup>109</sup> Further confirm that operators limit waste generation in processes related construction and demolition, in accordance with the EU Construction and Demolition Waste Management Protocol and	Generali confirms that it will adhere to the requirements with EU as the EU directives and EU regulations will be transposed as national regulation within all EU members states. Based on the above, Sustainalytics assessed this to be aligned with the EU Taxonomy criteria.	Aligned

<sup>107</sup> As set in the applicable national and regional building regulations for 'major renovation' implementing Directive 2010/31/EU. The energy performance of the building or the renovated part that is upgraded meets cost-optimal minimum energy performance requirements in accordance with the respective directive.

<sup>108</sup> The initial primary energy demand and the estimated improvement is based on a detailed building survey, an energy audit conducted by an accredited independent expert or any other transparent and proportionate method and validated through an Energy Performance Certificate. The 30 % improvement results from an actual reduction in primary energy demand (where the reductions in net primary energy demand through renewable energy sources are not taken into account) and can be achieved through a succession of measures within a maximum of three years.

<sup>109</sup> EU Construction and Demolition Waste Protocol : [https://ec.europa.eu/growth/content/eu-construction-and-demolition-waste-protocol-0\\_en](https://ec.europa.eu/growth/content/eu-construction-and-demolition-waste-protocol-0_en).

	<p>taking into account best available techniques and using selective demolition to enable removal and safe handling of hazardous substances and facilitate reuse and high-quality recycling by selective removal of materials, using available sorting systems for construction and demolition waste.</p> <p>Building designs and construction techniques support circularity and in particular demonstrate, with reference to ISO 20887<sup>110</sup> or other standards for assessing the disassembly or adaptability of buildings, how they are designed to be more resource efficient, adaptable, flexible and dismantlable to enable reuse and recycling.</p>		
<p>Pollution prevention and control</p>	<p>Buildings components and materials used in the construction complies with the criteria set out in Appendix 3 to the Annex I of the Climate Delegated Act.</p> <p>Buildings components and materials used in the building renovation that may come into contact with occupiers<sup>111</sup> emit less than 0,06 mg of formaldehyde per m<sup>3</sup> of material or component upon testing in accordance with the conditions specified in Annex XVII to Regulation (EC) No 1907/2006 and less than 0,001 mg of other categories 1A and 1B carcinogenic volatile organic compounds per m<sup>3</sup> of material or component, upon testing in accordance with CEN/EN 16516 or ISO 16000-3:2011<sup>112</sup> or other equivalent standardised test conditions and determination methods.<sup>113</sup></p> <p>Measures are taken to reduce noise, dust and pollutant emissions during construction or maintenance works.</p>	<p>Generali has communicated to Sustainalytics that the financed building construction activities in Italy and other EU Member States will comply with the below European and national standards to mitigate noise, dust, and pollutant emissions during construction or maintenance works:</p> <ul style="list-style-type: none"> <li>▪ EU Directive on Environmental Impact Assessment in accordance with Directive 2011/92/EU can be assumed to be transposed into national regulation</li> <li>▪ EU Regulation 1907/2006 (Dec 2006) concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH)</li> <li>▪ CEN/TS 16516:2013 Construction products - Assessment of release of dangerous substances - Determination of emissions into indoor air"</li> </ul> <p>The Group further confirmed that the following criteria will be covered by its due diligence process:</p> <ul style="list-style-type: none"> <li>▪ Building components and materials used in the building renovation that may come into contact with occupiers will emit less than 0.001 mg of other categories 1A and 1B carcinogenic volatile organic compounds per m<sup>3</sup> of material or component upon testing in accordance with CEN/EN 16516 or ISO 16000-3:2011 or other equivalent standardised test conditions and determination methods</li> <li>▪ New construction located on a potentially contaminated site (brownfield site) will be subject to investigation for potential contaminants, such as using standard ISO 18400</li> <li>▪ Measures will be taken to reduce noise, dust and pollutant emissions during construction or maintenance works</li> </ul>	<p>Aligned</p>

<sup>110</sup> ISO 20887:2020, Sustainability in buildings and civil engineering works - Design for disassembly and adaptability - Principles, requirements and guidance : <https://www.iso.org/standard/69370.html>).

<sup>111</sup> Applying to paints and varnishes, ceiling tiles, floor coverings (including associated adhesives and sealants), internal insulation and interior surface treatments (such as to treat damp and mould).

<sup>112</sup> ISO 16000-3:2011, Indoor air – Part 3: Determination of formaldehyde and other carbonyl compounds in indoor air and test chamber air – Active sampling method : <https://www.iso.org/standard/51812.html>).

<sup>113</sup> The emissions thresholds for carcinogenic volatile organic compounds relate to a 28-day test period.

	Generali confirmed to Sustainalytics that in accordance to guidance from Italy’s Directorate of General Health, the due diligence process checks if the formaldehyde is below 0.05 mg/m <sup>3</sup> .  Based on the above, Sustainalytics considers this activity to be aligned.
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Table 5

<b>Framework Activity assessed</b>		Green Buildings	
<b>EU Taxonomy Activity</b>		7.7. Acquisition and ownership of buildings	
<b>Associated NACE Code</b>		L68	
<b>EU Technical Screening Criteria</b>		<b>Alignment with Technical Screening Criteria</b>	
Mitigation	<p>1. For buildings built before 31 December 2020, the building has at least an Energy Performance Certificate (EPC) class A. As an alternative, the building is within the top 15% of the national or regional building stock expressed as operational Primary Energy Demand (PED) and demonstrated by adequate evidence, which at least compares the performance of the relevant asset to the performance of the national or regional stock built before 31 December 2020 and at least distinguishes between residential and non-residential buildings.</p> <p>2. For buildings built after 31 December 2020, the building meets the criteria specified in Section 7.1 of the Annex I of the Climate Delegated Act that are relevant at the time of the acquisition.</p> <p>3. Where the building is a large non-residential building (with an effective rated output for heating systems, systems for combined space heating and ventilation, air-conditioning systems or systems for combined air-conditioning and ventilation of over 290 kW), demonstrate that it is efficiently operated through energy performance monitoring and assessment.<sup>114</sup></p>	<p>1. The Framework includes financing of residential and commercial buildings built before 31 December 2020 with EPC label A or above.</p> <p>2. Generali has communicated to Sustainalytics that such financings are not included in its portfolio, hence the criterion is not applicable.</p> <p>3. Generali has communicated to Sustainalytics that this is required through an Energy Performance Contract or presence of a building automation and control system in accordance with Article 14 (4) and Article 15 (4) of Energy Performance of Buildings Directive. Further, the Group confirmed that technical data for major part of the portfolio will be collected and stored in an ESG Core System tool</p> <p>Based on the above, Sustainalytics assessed this to be aligned with the EU Taxonomy criteria.</p>	Aligned
<b>DNSH Criteria</b>		<b>Alignment with DNSH Criteria</b>	
Climate change adaptation	Refer to the assessment set out in Appendix 3, Table 36		Aligned

Table 6

<sup>114</sup> This can be demonstrated, for example, through the presence of an Energy Performance Contract or a building automation and control system in accordance with Article 14 (4) and Article 15 (4), of Directive 2010/31/EU.

<b>Framework Activity assessed</b>	Renewable Energy		
<b>EU Taxonomy Activity</b>	4.1. Electricity generation using solar photovoltaic technology		
<b>Associated NACE Codes</b>	D35.11 and F42.22		
<b>EU Technical Screening Criteria</b>		<b>Alignment with Technical Screening Criteria</b>	
Mitigation	The activity generates electricity using solar PV technology.	Aligned by default	Aligned
<b>DNSH Criteria</b>		<b>Alignment with DNSH Criteria</b>	
Climate Change Adaptation	Refer to the assessment set out in Appendix 3, Table 36		Aligned
Transition to a circular economy	The activity assesses availability of and, where feasible, uses equipment and components of high durability and recyclability and that are easy to dismantle and refurbish.	<p>Generali confirms that the Directive 2012/19/EU on Waste Electrical and Electronic Equipment Directive (WEEE) regulates the treatment of electrical and electronic waste at the end of their life cycle within EU member states. WEEE set the fundamental legalities and obligations for collecting and recycling photovoltaic panels in the EU, including setting minimum collection and recovery targets.</p> <p>Further, Generali confirms that Ecodesign Directive 2009/125/EC on improving circularity will be adhered to, as it will be transposed into national regulations within EU member states.</p> <p>Based on the above, Sustainalytics assessed this to be aligned with the EU Taxonomy criteria.</p>	Aligned
Protection and restoration of biodiversity and ecosystems	Refer to the assessment set out in Appendix 3, Table 39		Aligned

Table 7

<b>Framework Activity assessed</b>	Renewable Energy		
<b>EU Taxonomy Activity</b>	4.2. Electricity generation using concentrated solar power (CSP) technology		
<b>Associated NACE Codes</b>	D35.11 and F42.22		
<b>EU Technical Screening Criteria</b>		<b>Alignment with Technical Screening Criteria</b>	
Mitigation	The activity generates electricity using CSP technology.	Aligned by default	Aligned
<b>DNSH Criteria</b>		<b>Alignment with DNSH Criteria</b>	
Climate Change Adaptation	Refer to the assessment set out in Appendix 3, Table 36		Aligned
Sustainable use and protection of water and marine resources	Refer to the assessment set out in Appendix 3, Table 37		Aligned
Transition to a circular economy	The activity assesses availability of and, where feasible, uses equipment and components of high durability and recyclability and that are easy to dismantle and refurbish.	<p>Generali confirms to Sustainalytics that the Directive 2012/19/EU on Waste Electrical and Electronic Equipment Directive (WEEE) regulates the treatment of electrical and electronic waste at the end of their life cycle within EU member states. WEEE set the fundamental legalities and obligations for collecting and recycling photovoltaic panels in the EU, including setting minimum collection and recovery targets.</p> <p>Further, Generali confirms that Ecodesign Directive 2009/125/EC on improving circularity will be adhered to, as it will be transposed into national regulations within EU member states.</p> <p>Based on the above, Sustainalytics assessed this to be aligned with the EU Taxonomy criteria.</p>	Aligned
Protection and restoration of biodiversity and ecosystems	Refer to the assessment set out in Appendix 3, Table 39		Aligned

Table 8

<b>8Framework Activity assessed</b>	Renewable Energy
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<b>EU Taxonomy Activity</b>		4.3. Electricity generation from wind power	
<b>Associated NACE Codes</b>		D35.11 and F42.22	
<b>EU Technical Screening Criteria</b>		<b>Alignment with Technical Screening Criteria</b>	
Mitigation	The activity generates electricity from wind power.	Aligned by default	Aligned
<b>DNSH Criteria</b>		<b>Alignment with DNSH Criteria</b>	
Climate change adaptation	Refer to the assessment set out in Appendix 3, Table 36		Aligned
Sustainable use and protection of water and marine resources	In case of construction of offshore wind, the activity does not hamper the achievement of good environmental status as set out in Directive 2008/56/EC of the European Parliament and of the Council <sup>115</sup> , requiring that the appropriate measures are taken to prevent or mitigate impacts in relation to that Directive's Descriptor 11 (Noise/Energy), laid down in Annex I to that Directive, and as set out in Commission Decision (EU) 2017/848 <sup>116</sup> in relation to the relevant criteria and methodological standards for that descriptor.	Generali confirms to Sustainalytics that it will rely on national transposition of Directive 2008/56/EC and EU commission Decision EU 2017/858 within EU member states and it is bound by and relies on compliance with the laws and regulations of the respective country where the eligible project is located. Furthermore, Generali uses and relies on, if available, certifications and inspections employed by the involved project parties. With every investment that Generali undertakes, additional evidence, if available, is gathered via its due diligence process which among others include the environmental aspects of the project. Based on the above, Sustainalytics assessed this to be aligned with the EU Taxonomy criteria.	Aligned
Transition to a circular economy	The activity assesses availability of and, where feasible, uses equipment and components of high durability and recyclability and that are easy to dismantle and refurbish.	Generali confirms that it will adhere to this requirement. Further, Generali will rely, if available, on certifications and inspections employed by the involved project parties. With every investment that Generali undertakes, additional evidence is gathered as part of its due diligence process which among other includes the environmental aspects of the project. Based on the above, Sustainalytics assessed this to be aligned with the EU Taxonomy criteria.	Aligned
Protection and restoration of biodiversity	The activity complies with the criteria set out in Appendix D to the Annex I of the Climate Delegated Act <sup>117</sup>  In case of offshore wind, the activity does not hamper the achievement of good environmental status as set out in Directive 2008/56/EC, requiring that the appropriate measures are taken to prevent or mitigate	Refer to the assessment set out in Appendix 3, Table 39  Sustainalytics notes that the Directive 2008/56/EC of the European Parliament and of the Council of 17 June 2008 establishing a framework for community action in the field of marine environmental	Aligned

<sup>115</sup> Directive 2008/56/EC of the European Parliament and of the Council of 17 June 2008 establishing a framework for community action in the field of marine environmental policy (Marine Strategy Framework Directive) (OJ L 164, 25.6.2008, p. 19).

<sup>116</sup> Commission Decision (EU) 2017/848 of 17 May 2017 laying down criteria and methodological standards on good environmental status of marine waters and specifications and standardised methods for monitoring and assessment, and repealing Decision 2010/477/EU (OJ L 125, 18.5.2017, p. 43).

<sup>117</sup> Practical guidance for the implementation of this criterion is contained in the European Commission notice C(2020) 7730 final "Guidance document on wind energy developments and EU nature legislation", : [https://ec.europa.eu/environment/nature/natura2000/management/docs/wind\\_farms\\_en.pdf](https://ec.europa.eu/environment/nature/natura2000/management/docs/wind_farms_en.pdf)).

ecosystems	impacts in relation to that Directive's Descriptors 1 (biodiversity) and 6 (seabed integrity), laid down in Annex I to that Directive, and as set out in Decision (EU) 2017/848 in relation to the relevant criteria and methodological standards for those descriptors.	policy (Marine Strategy Framework Directive) has been transposed into national law in all EU Member States as of 2013.  Based on the above, Sustainalytics assessed this to be aligned with the EU Taxonomy criteria.	
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Table 9

<b>Framework Activity assessed</b>		Renewable Energy	
<b>EU Taxonomy Activity</b>		4.5. Electricity generation from hydropower	
<b>Associated NACE Codes</b>		D35.11 and F42.22	
<b>EU Technical Screening Criteria</b>		<b>Alignment with Technical Screening Criteria</b>	
Mitigation	The activity complies with either of the following criteria: a) the electricity generation facility is a run-of-river plant and does not have an artificial reservoir;  b) the power density of the electricity generation facility is above 5W/m <sup>2</sup> ;  c) the life-cycle GHG emissions from the generation of electricity from hydropower, are lower than 100gCO <sub>2</sub> e/kWh. The life-cycle GHG emissions are calculated using Recommendation 2013/179/EU or, alternatively, using ISO 14067:2018 <sup>118</sup> , ISO 14064-1:2018 <sup>119</sup> or the G-res tool. Quantified life-cycle GHG emissions are verified by an independent third party.	Generali confirms that only investments in hydro plants meeting at least one of these criteria will be included in the eligible pool.  Based on the above, Sustainalytics assessed this to be aligned with the EU Taxonomy criteria.	Aligned
<b>DNSH Criteria</b>		<b>Alignment with DNSH Criteria</b>	
Climate change adaptation	Refer to the assessment set out in Appendix 3, Table 36		Aligned
Sustainable use and protection of water and marine	1. The activity complies with the provisions of Directive 2000/60/EC, in particular with all the requirements laid down in Article 4 of the Directive.  2. For operation of existing hydropower plants, including refurbishment activities to enhance renewable energy or energy storage potential, the activity complies with the following criteria:	1. Generali confirms to Sustainalytics that all projects included in the Framework will be compliant achievement of good ecological status by 2015 or, at the latest, by 2027. Additionally, all projects included in the Framework will be compliant with the Directive given national transposition of the Directive into national legislation within EU member states.	Aligned

<sup>118</sup> ISO standard 14067:2018, Greenhouse gases – Carbon footprint of products – Requirements and guidelines for quantification : <https://www.iso.org/standard/71206.html>).

<sup>119</sup> ISO standard 14064-1:2018, Greenhouse gases – Part 1: Specification with guidance at the organization level for quantification and reporting of greenhouse gas emissions and removals : <https://www.iso.org/standard/66453.html>).

<p>resources</p>	<p>2.1. In accordance with Directive 2000/60/EC and in particular Articles 4 and 11 of that Directive, all technically feasible and ecologically relevant mitigation measures have been implemented to reduce adverse impacts on water as well as on protected habitats and species directly dependent on water.</p> <p>2.2. Measures include, where relevant and depending on the ecosystems naturally present in the affected water bodies:</p> <ul style="list-style-type: none"> <li>a) measures to ensure downstream and upstream fish migration (such as fish friendly turbines, fish guidance structures, state-of-the-art fully functional fish passes, measures to stop or minimise operation and discharges during migration or spawning);</li> <li>b) measures to ensure minimum ecological flow (including mitigation of rapid, short-term variations in flow or hydropeaking operations) and sediment flow;</li> <li>c) measures to protect or enhance habitats.</li> </ul> <p>2.3. The effectiveness of those measures is monitored in the context of the authorisation or permit setting out the conditions aimed at achieving good status or potential of the affected water body.</p> <p>3. For construction of new hydropower plants, the activity complies with the following criteria:</p> <p>3.1. In accordance with Article 4 of Directive 2000/60/EC and in particular paragraph 7 of that Article, prior to construction, an impact assessment of the project is carried out to assess all its potential impacts on the status of water bodies within the same river basin and on protected habitats and species directly dependent on water, considering in particular migration corridors, free-flowing rivers or ecosystems close to undisturbed conditions.</p> <p>The assessment is based on recent, comprehensive and accurate data, including monitoring data on biological quality elements that are specifically sensitive to hydromorphological alterations, and on the expected status of the water body as a result of the new activities, as compared to its current one.</p>	<p>2. Generali confirms to Sustainalytics that Generali intends to comply with this requirement. Further, Generali has a process in place which takes into account a risk-based approach that considers material ESG issues, encompassing climate, environment, social conditions, and governance, which is in compliance with the risk policies.</p> <p>3. Generali confirms to Sustainalytics that all projects included in the Framework will be compliant with the Directive given the transposition of the Directive into national legislation within EU member states.</p> <p>Based on the above, Sustainalytics assessed this to be aligned with the EU Taxonomy criteria.</p>	
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	<p>It assesses in particular the cumulated impacts of this new project with other existing or planned infrastructure in the river basin.</p> <p>3.2. On the basis of that impact assessment, it has been established that the plant is conceived, by design and location and by mitigation measures, so that it complies with one of the following requirements:</p> <ul style="list-style-type: none"> <li>a) the plant does not entail any deterioration nor compromises the achievement of good status or potential of the specific water body it relates to;</li> <li>b) where the plant risks to deteriorate or compromise the achievement of good status/potential of the specific water body it relates to, such deterioration is not significant, and is justified by a detailed cost-benefit assessment demonstrating both of the following:             <ul style="list-style-type: none"> <li>i) the reasons of overriding public interest or the fact that benefits expected from the planned hydropower plant outweigh the costs from deteriorating the status of water that are accruing to the environment and to society;</li> <li>ii) the fact that the overriding public interest or the benefits expected from the plant cannot, for reasons of technical feasibility or disproportionate cost, be achieved by alternative means that would lead to a better environmental outcome (such as refurbishing of existing hydropower plants or use of technologies not disrupting river continuity).</li> </ul> </li> </ul> <p>3.3. All technically feasible and ecologically relevant mitigation measures are implemented to reduce adverse impacts on water as well as on protected habitats and species directly dependent on water. Mitigation measures include, where relevant and depending on the ecosystems naturally present in the affected water bodies:</p> <ul style="list-style-type: none"> <li>a) measures to ensure downstream and upstream fish migration (such as fish friendly turbines, fish guidance structures, state of the-art fully functional fish passes, measures to stop or minimise operation and discharges during migration or spawning);</li> </ul>		
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	<p>b) measures to ensure minimum ecological flow (including mitigation of rapid, short-term variations in flow or hydropeaking operations) and sediment flow;</p> <p>c) measures to protect or enhance habitats. The effectiveness of those measures is monitored in the context of the authorisation or permit setting out the conditions aimed at achieving good status or potential of the affected water body.</p> <p>3.4. The plant does not permanently compromise the achievement of good status/potential in any of the water bodies in the same river basin district.</p> <p>3.5. In addition to the mitigation measures referred to above, and where relevant, compensatory measures are implemented to ensure that the project does not increase the fragmentation of water bodies in the same river basin district. This is achieved by restoring continuity within the same river basin district to an extent that compensates the disruption of continuity, which the planned hydropower plant may cause. Compensation starts prior to the execution of the project.</p>		
<p>Protection and restoration of biodiversity and ecosystems</p>	<p>Refer to the assessment set out in Appendix 3, Table 39</p>		<p>Aligned</p>

Table 10

<p><b>Framework Activity assessed</b></p>		<p>Renewable Energy</p>	
<p><b>EU Taxonomy Activity</b></p>		<p>4.6. Electricity generation from geothermal energy</p>	
<p><b>Associated NACE Codes</b></p>		<p>D35.11 and F42.22</p>	
<p><b>EU Technical Screening Criteria</b></p>		<p><b>Alignment with Technical Screening Criteria</b></p>	
<p>Mitigation</p>	<p>Life-cycle GHG emissions from the generation of electricity from geothermal energy are lower than 100gCO<sub>2</sub>e/kWh. Life-cycle GHG emission savings are calculated using Commission Recommendation 2013/179/EU or, alternatively, using ISO 14067:2018 or ISO 14064-</p>	<p>The eligibility criteria defined in the Framework comply with the criteria mentioned in the screening criteria of EU Taxonomy.</p> <p>Generali confirms the calculation and verification requirements.</p>	<p>Aligned</p>

	1:2018. Quantified life-cycle GHG emissions are verified by an independent third party.	Based on the above, Sustainalytics assessed this to be aligned with the EU Taxonomy criteria.	
<b>DNSH Criteria</b>		<b>Alignment with DNSH Criteria</b>	
Climate change adaptation	Refer to the assessment set out in Appendix 3, Table 36		Aligned
Sustainable water	Refer to the assessment set out in Appendix 3, Table 37		Aligned
Pollution prevention and control	For the operation of high-enthalpy geothermal energy systems, adequate abatement systems are in place to reduce emission levels in order not to hamper the achievement of air quality limit values set out in Directive 2004/107/EC of the European Parliament and of the Council <sup>120</sup> and Directive 2008/50/EC of the European Parliament and of the Council. <sup>121</sup>	Generali confirms to Sustainalytics that the Directives 2008/50/EC <sup>120</sup> and 2004/107/EC <sup>121</sup> were given legal effect in most EU member states. In case of assets located in the UK, if any, the UK Directive 2004/107/EC relating to arsenic, cadmium, mercury, nickel and polycyclic aromatic hydrocarbons and the Directive 2008/50/EC on ambient air quality and cleaner air for Europe were given legal effect by the Air Quality Standards Regulations 2010 (S.I. No. 1001 of 2010) on ambient air quality assessment and management and limit values for air quality.  Based on the above, Sustainalytics assessed this to be aligned with the EU Taxonomy criteria.	Aligned
Protection and restoration of biodiversity and ecosystems	Refer to the assessment set out in Appendix 3, Table 39		Aligned

Table 11

<b>Framework Activity assessed</b>	Renewable Energy
<b>EU Taxonomy Activity</b>	4.8. Electricity generation from bioenergy
<b>Associated NACE Code</b>	D35.11
<b>EU Technical Screening Criteria</b>	<b>Alignment with Technical Screening Criteria</b>

<sup>120</sup> Directive 2004/107/EC of the European Parliament and of the Council of 15 December 2004 relating to arsenic, cadmium, mercury, nickel and polycyclic aromatic hydrocarbons in ambient air (OJ L 23, 26.1.2005, p. 3).

<sup>121</sup> Directive 2008/50/EC of the European Parliament and of the Council of 21 May 2008 on ambient air quality and cleaner air for Europe (OJ L 152, 11.6.2008, p. 1).

<p>Mitigation</p>	<ol style="list-style-type: none"> <li>1. Agricultural biomass used in the activity complies with the criteria laid down in Article 29, paragraphs 2 to 5, of Directive (EU) 2018/2001. Forest biomass used in the activity complies with the criteria laid down in Article 29, paragraphs 6 and 7 of that Directive.</li> <li>2. The greenhouse gas emission savings from the use of biomass are at least 80% in relation to the GHG saving methodology and the relative fossil fuel comparator set out in Annex VI to Directive (EU) 2018/2001.</li> <li>3. Where the installations rely on anaerobic digestion of organic material, the production of the digestate meets the criteria in Sections 5.6 and criteria 1 and 2 of Section 5.7 of the Annex I of the Climate Delegated Act, as applicable.</li> <li>4. Points 1 and 2 do not apply to electricity generation installations with a total rated thermal input below 2 MW and using gaseous biomass fuels.</li> <li>5. For electricity generation installations with a total rated thermal input from 50 to 100 MW, the activity applies high-efficiency cogeneration technology, or, for electricity-only installations, the activity meets an energy efficiency level associated with the best available techniques (BAT-AEL) ranges set out in the latest relevant best available techniques (BAT) conclusions, including the best available techniques (BAT) conclusions for large combustion plants.<sup>122</sup></li> <li>6. For electricity generation installations with a total rated thermal input above 100 MW, the activity complies with one or more of the following criteria:             <ol style="list-style-type: none"> <li>a) attains electrical efficiency of at least 36%;</li> <li>b) applies highly efficient CHP (combined heat and power) technology as referred to in Directive 2012/27/EU of the European Parliament and of the Council;<sup>123</sup></li> <li>c) uses carbon capture and storage technology. Where the CO<sub>2</sub> that would otherwise be emitted from the electricity generation process is captured for the purpose of underground storage, the CO<sub>2</sub> is transported and stored underground in accordance with the technical screening criteria set out in Sections 5.11 and 5.12, respectively, of the Annex I of the Climate Delegated Act.</li> </ol> </li> </ol>	<p>The eligibility criteria defined in the Framework comply with the criteria mentioned in the screening criteria of EU Taxonomy.</p> <p>Generali confirms all the criteria set out for this activity.</p> <p>Based on the above, Sustainabilitytics assessed this to be aligned with the EU Taxonomy criteria.</p>	<p>Aligned</p>
<p><b>DNSH Criteria</b></p>		<p><b>Alignment with DNSH Criteria</b></p>	

<sup>122</sup> Implementing Decision (EU) 2017/1442.

<sup>123</sup> Directive 2012/27/EU of the European Parliament and of the Council of 25 October 2012 on energy efficiency, amending Directives 2009/125/EC and 2010/30/EU and repealing Directives 2004/8/EC and 2006/32/EC (OJ L 315, 14.11.2012, p. 1).

Climate change adaptation	Refer to the assessment set out in Appendix 3, Table 36		Aligned
Sustainable water	Refer to the assessment set out in Appendix 3, Table 37		Aligned
Pollution prevention and control	<p>For installations falling within the scope of Directive 2010/75/EU of the European Parliament and of the Council<sup>124</sup>, emissions are within or lower than the emission levels associated with the best available techniques (BAT-AEL) ranges set out in the latest relevant best available techniques (BAT) conclusions, including the best available techniques (BAT) conclusions for large combustion plants.<sup>125</sup> No significant cross-media effects occur.</p> <p>For combustion plants with thermal input greater than 1 MW but below the thresholds for the BAT conclusions for large combustion plants to apply, emissions are below the emission limit values set out in Annex II, part 2, to Directive (EU) 2015/2193. For plants in zones or parts of zones not complying with the air quality limit values laid down in Directive 2008/50/EC, measures are implemented to reduce emission levels taking into account the results of the information exchange<sup>126</sup> which are published by the Commission in accordance with Article 6, paragraphs 9 and 10 of Directive (EU) 2015/2193.</p> <p>For anaerobic digestion of organic material, where the produced digestate is used as fertiliser or soil improver, either directly or after composting or any other treatment, it meets the requirements for fertilising materials set out in Component Material Categories (CMC) 4 and 5 in Annex II to Regulation (EU) 2019/1009 or national rules on fertilisers or soil improvers for agricultural use.</p> <p>For anaerobic digestion plants treating over 100 tonnes per day, emissions to air and water are within or lower than the emission levels associated with the best available techniques (BAT-AEL) ranges set for anaerobic treatment of waste in the latest relevant best available techniques (BAT) conclusions, including the best available techniques (BAT) conclusions for waste treatment.<sup>127</sup> No significant cross-media effects occur.</p>	<p>Generali confirmed to Sustainalytics that all the requirements are included as part of due diligence processes.</p> <p>Based on the above, Sustainalytics considers this activity to be aligned.</p>	Aligned

<sup>124</sup> Directive 2010/75/EU of the European Parliament and of the Council of 24 November 2010 on industrial emissions (integrated pollution prevention and control) (OJ L 334, 17.12.2010, p. 17).

<sup>125</sup> Implementing Decision (EU) 2017/1442.

<sup>126</sup> The final technology report resulting from the exchange of information with Member States, the industries concerned and non-governmental organisations contains technical information on best available technologies used in medium combustion plants to reduce their environmental impacts, and on the emission levels achievable with best available and emerging technologies and the related costs : <https://circabc.europa.eu/ui/group/06f33a94-9829-4eee-b187-21bb783a0fbf/library/9a99a632-9ba8-4cc0-9679-08d929afda59/details>).

<sup>127</sup> Commission Implementing Decision (EU) 2018/1147 of 10 August 2018 establishing best available techniques (BAT) conclusions for waste treatment, under Directive 2010/75/EU of the European Parliament and of the Council (OJ L 208, 17.8.2018, p. 38).

Protection and restoration of biodiversity and ecosystems	Refer to the assessment set out in Appendix 3, Table 39	Aligned
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Table 12

<b>Framework Activity assessed</b>	Renewable Energy		
<b>EU Taxonomy Activity</b>	4.9. Transmission and distribution of electricity		
<b>Associated NACE Codes</b>	D35.12, D35.13		
<b>EU Technical Screening Criteria</b>		<b>Alignment with Technical Screening Criteria</b>	
Mitigation	<p>The activity complies with one of the following criteria:</p> <ol style="list-style-type: none"> <li>1. The transmission and distribution infrastructure or equipment is in an electricity system that complies with at least one of the following criteria:                             <ol style="list-style-type: none"> <li>a) the system is the interconnected European system, i.e., the interconnected control areas of Member States, Norway, Switzerland and the United Kingdom, and its subordinated systems;</li> <li>b) more than 67% of newly enabled generation capacity in the system is below the generation threshold value of 100 gCO<sub>2</sub>e/kWh measured on a life cycle basis in accordance with electricity generation criteria, over a rolling five-year period;</li> <li>c) the average system grid emissions factor, calculated as the total annual emissions from power generation connected to the system, divided by the total annual net electricity production in that system, is below the threshold value of 100 gCO<sub>2</sub>e/kWh measured on a life cycle basis in accordance with electricity generation criteria, over a rolling five-year period;</li> </ol> </li> </ol> <p>Infrastructure dedicated to creating a direct connection or expanding an existing direct connection between a substation or network and a power production plant that is more greenhouse gas intensive than 100 gCO<sub>2</sub>e/kWh measured on a life cycle basis is not compliant.</p>	<p>Sustainalytics notes that the Framework specifies financing towards transmission and distribution infrastructure in an electricity system that complies with at least one of the following criteria:</p> <ol style="list-style-type: none"> <li>a) The system is the interconnected European system, and its subordinate systems, or</li> <li>b) more than 67% of newly enabled generation assets comply with the 100gCO<sub>2</sub>e/kWh life cycle threshold (over a rolling 5-year period), or</li> <li>c) the grid’s average emissions factor is less than 100gCO<sub>2</sub>e/kWh (over a rolling 5-year period) or</li> <li>d) direct connections, or expansion of existing direct connections of renewable energy sources</li> </ol> <p>Generali confirms that metering system to be installed will be compliant with screening criteria of EU Taxonomy.</p> <p>Based on the above, Sustainalytics assessed this to be aligned with the EU Taxonomy criteria.</p>	Aligned

	<p>Installation of metering infrastructure that does not meet the requirements of smart metering systems of Article 20 of Directive (EU) 2019/944 is not compliant.</p> <p>2. The activity is one of the following:</p> <ol style="list-style-type: none"> <li>a) construction and operation of direct connection, or expansion of existing direct connection, of low carbon electricity generation below the threshold of 100 gCO<sub>2e</sub>/kWh measured on a life cycle basis to a substation or network;</li> <li>b) construction and operation of electric vehicle (EV) charging stations and supporting electric infrastructure for the electrification of transport, subject to compliance with the technical screening criteria under the transport Section of the Annex I of the Climate Delegated Act;</li> <li>c) installation of transmission and distribution transformers that comply with the Tier 2 (1 July 2021) requirements set out in Annex I to the Commission Regulation (EU) No 548/2014<sup>128</sup> and, for medium power transformers with highest voltage for equipment not exceeding 36 kV, with AAA0 level requirements on no-load losses set out in standard EN 50588-1<sup>129</sup></li> <li>d) construction/installation and operation of equipment and infrastructure where the main objective is an increase of the generation or use of renewable electricity generation;</li> <li>e) installation of equipment to increase the controllability and observability of the electricity system and to enable the development and integration of renewable energy sources, including: <ol style="list-style-type: none"> <li>i) sensors and measurement tools (including meteorological sensors for forecasting renewable production);</li> <li>ii) communication and control (including advanced software and control rooms, automation of substations or feeders, and voltage control capabilities to adapt to more decentralised renewable infeed).</li> </ol> </li> <li>f) installation of equipment such as, but not limited to future smart metering systems or those replacing smart metering systems in line with Article 19(6) of Directive (EU) 2019/944 of the European Parliament and of the Council<sup>130</sup>, which meet the requirements of Article 20 of Directive (EU)</li> </ol>		
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<sup>128</sup> Commission Regulation (EU) No 548/2014 of 21 May 2014 on implementing Directive 2009/125/EC of the European Parliament and of the Council with regard to small, medium and large power transformers (OJ L 152, 22.5.2014, p. 1).

<sup>129</sup> CEI EN 50588-1 Medium power transformers 50 Hz, with highest voltage for equipment not exceeding 36 kV.

<sup>130</sup> Directive (EU) 2019/944 of the European Parliament and of the Council of 5 June 2019 on rules for the internal market for electricity and amending Directive 2012/27/EU (OJ L 158/125, 14.6.2019),

	<p>2019/944, able to carry information to users for remotely acting on consumption, including customer data hubs;</p> <ul style="list-style-type: none"> <li>g) construction/installation of equipment to allow for exchange of specifically renewable electricity between users;</li> <li>h) construction and operation of interconnectors between transmission systems, provided that one of the systems is compliant.</li> </ul> <p>For the purposes of this Section, the following specifications apply:</p> <ul style="list-style-type: none"> <li>a) the rolling five-year period used in determining compliance with the thresholds is based on five consecutive historical years, including the year for which the most recent data are available;</li> <li>b) a 'system' means the power control area of the transmission or distribution network where the infrastructure or equipment is installed;</li> <li>c) transmission systems may include generation capacity connected to subordinated distribution systems;</li> <li>d) distribution systems subordinated to a transmission system that is deemed to be on a trajectory to full decarbonisation may also be deemed to be on a trajectory to full decarbonisation;</li> <li>e) to determine compliance, it is possible to consider a system covering multiple control areas which are interconnected and with significant energy exchanges between them, in which case the weighted average emissions factor across all included control areas is used, and individual subordinated transmission or distribution systems within that system is not required to demonstrate compliance separately;</li> <li>f) it is possible for a system to become non-compliant after having previously been compliant. In systems that become non-compliant, no new transmission and distribution activities are compliant from that moment onward, until the system complies again with the threshold (except for those activities that are always compliant, see above). Activities in subordinated systems may still be compliant, where those subordinated systems meet the criteria of this Section;</li> <li>g) a direct connection or expansion of an existing direct connection to production plants includes infrastructure that is indispensable to carry the associated electricity from the power generating facility to a substation or to the network.</li> </ul>		
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	DNSH Criteria	Alignment with DNSH Criteria	
Climate change adaptation	Refer to the assessment set out in Appendix 3, Table 36		Aligned
Transition to a circular economy	A waste management plan is in place and ensures maximal reuse or recycling at end of life in accordance with the waste hierarchy, including through contractual agreements with waste management partners, reflection in financial projections or official project documentation.	Generali will abide to the Waste Electrical and Electronic Equipment Directive (WEEE) that regulates the treatment of electrical and electronic waste at the end of their life cycle. For all member states of the European Union, the WEEE can be assumed to be transposed into national regulation. EU has comprehensive regulatory package around waste management such as the Waste Framework Directive (2008/98)107, Battery and Accumulators Directive (2006/66)108, Landfill Directive (1999/31).  Based on the above, Sustainalytics assessed this to be aligned with the EU Taxonomy criteria.	Aligned
Pollution prevention and control	Overground high voltage lines:  a) for construction site activities, activities follow the principles of the IFC General Environmental, Health, and Safety Guidelines.  b) activities respect applicable norms and regulations to limit impact of electromagnetic radiation on human health, including for activities carried out in the Union, the Council recommendation on the limitation of exposure of the general public to electromagnetic fields (0 Hz to 300 GHz) <sup>131</sup> and for activities carried out in third countries, the 1998 Guidelines of International Commission on Non-Ionizing Radiation Protection (ICNIRP). <sup>132</sup>  Activities do not use PCBs (polychlorinated biphenyls).	Generali confirms to Sustainalytics that for construction site activities, EU countries, and the UK follow Environmental, Health and Safety (EHS) laws. Most European countries, including Italy, have regulations in place to safeguard the health of workers and the general public from exposure to electromagnetic fields (1999/519/EC). Following studies and in order to protect health and safety as well as environmental protection, first the European Community and then, as a transposition, Italy (DPR 206/88. Legislative Decree 209/99) prohibited the marketing and use of equipment containing PCBs.  Based on the above, Sustainalytics assessed this to be aligned with the EU Taxonomy criteria.	Aligned
Protection and restoration of biodiversity and ecosystems	Refer to the assessment set out in Appendix 3, Table 39		Aligned

Table 13

<sup>131</sup> Council Recommendation of 12 July 1999 on the limitation of exposure of the general public to electromagnetic fields (0 Hz to 300 GHz) (1999/519/EC) (OJ L 199, 30.7.1999, p. 59).

<sup>132</sup> ICNIRP 1998 Guidelines for limiting exposure to time-varying electric, magnetic and electromagnetic fields (up to 300 ghz) : <https://www.icnirp.org/cms/upload/publications/ICNIRPemfgdl.pdf>.

<b>Framework Activity assessed</b>		Renewable Energy	
<b>EU Taxonomy Activity</b>		4.10. Storage of electricity	
<b>Associated NACE Code</b>		No associated code	
<b>EU Technical Screening Criteria</b>		<b>Alignment with Technical Screening Criteria</b>	
Mitigation	<p>The activity is the construction and operation of electricity storage including pumped hydropower storage.</p> <p>Where the activity includes chemical energy storage, the medium of storage (such as hydrogen or ammonia) complies with the criteria for manufacturing of the corresponding product specified in Sections 3.7 to 3.17 of the Annex I. In case of using hydrogen as electricity storage, where hydrogen meets the technical screening criteria specified in Section 3.10 of the Annex I of the Climate Delegated Act, re-electrification of hydrogen is also considered part of the activity.</p>	Aligned by default	Aligned
<b>DNSh Criteria</b>		<b>Alignment with DNSh Criteria</b>	
Climate change adaptation	Refer to the assessment set out in Appendix 3, Table 36		Aligned
Sustainable use and protection of water and marine resources	<p>In case of pumped hydropower storage not connected to a river body, the activity complies with the criteria set out in Appendix B to the Annex I:</p> <p>In case of pumped hydropower storage connected to a river body, the activity complies with the criteria for DNSh to sustainable use and protection of water and marine resources specified in Section 4.5 of the Climate Delegated Act (Electricity production from hydropower).</p>	<p>Sustainalytics notes that the EU Water Framework Directive (2000/60/EC) mandates that all Member States safeguard and enhance water quality across all bodies of water to attain good ecological status. Generali confirms to Sustainalytics that all projects financed under the Framework in the EU are expected to comply with the criteria set out in Appendix B and applicable pursuant to the Directive given national transposition of the Directive into national legislation.</p> <p>Based on the above, Sustainalytics assessed this to be aligned with the EU Taxonomy criteria.</p>	Aligned
Transition to a circular economy	A waste management plan is in place and ensures maximal reuse or recycling at end of life in accordance with the waste hierarchy, including through contractual agreements with waste management partners, reflection in financial projections or official project documentation.	<p>Sustainalytics notes that in the EU, the Waste Electrical and Electronic Equipment Directive (WEEE) regulates the treatment of electrical and electronic waste at the end of their life cycle. For all member states of the European Union, the WEEE can be assumed to be transposed into national regulation. EU has comprehensive regulatory package around waste management such as the Waste Framework Directive (2008/98)107, Battery and Accumulators Directive (2006/66)108, Landfill Directive (1999/31)</p> <p>Based on the above, Sustainalytics assessed this to be aligned with the EU Taxonomy criteria.</p>	Aligned

Protection and restoration of biodiversity and ecosystems	Refer to the assessment set out in Appendix 3, Table 39	Aligned
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Table 14

Framework Activity assessed		Renewable Energy	
EU Taxonomy Activity		4.20. Cogeneration of heat/cool and power from bioenergy	
Associated NACE Codes		D35.11 and D35.30	
EU Technical Screening Criteria		Alignment with Technical Screening Criteria	
Mitigation	<p>1. Agricultural biomass used in the activity complies with the criteria laid down in Article 29, paragraphs 2 to 5, of Directive (EU) 2018/2001. Forest biomass used in the activity complies with the criteria laid down in Article 29, paragraphs 6 and 7 of that Directive.</p> <p>2. The greenhouse gas emission savings from the use of biomass in cogeneration installations are at least 80 % in relation to the GHG emission saving methodology and fossil fuel comparator set out in Annex VI to Directive (EU) 2018/2001.</p> <p>3. Where the cogeneration installations rely on anaerobic digestion of organic material, the production of the digestate meets the criteria in Sections 5.6 and criteria 1 and 2 of Section 5.7 of the Annex I of the Climate Delegated Act, as applicable.</p> <p>4. Points 1 and 2 do not apply to cogeneration installations with a total rated thermal input below 2 MW and using gaseous biomass fuels.</p>	<p>The eligibility criteria defined in the Framework comply with the criteria mentioned in the screening criteria of EU Taxonomy.</p> <p>Generali confirms all the criteria set out for this activity.</p> <p>Based on the above, Sustainalytics assessed this to be aligned with the EU Taxonomy criteria.</p>	Aligned
DNSH Criteria		Alignment with DNSH Criteria	
Climate change adaptation	Refer to the assessment set out in Appendix 3, Table 36		Aligned
Sustainable use and protection of water	Refer to the assessment set out in Appendix 3, Table 37		Aligned

<p>and marine resources</p>			
<p>Pollution prevention and control</p>	<p>For installations falling within the scope of Directive 2010/75/EU, emissions are within or lower than the emission levels associated with the best available techniques (BAT-AEL) ranges set out in the latest relevant best available techniques (BAT) conclusions, including the best available techniques (BAT) conclusions for large combustion plants,<sup>133</sup> ensuring at the same time that no significant cross-media effects occur.</p> <p>For combustion plants with thermal input greater than 1 MW but below the thresholds for the BAT conclusions for large combustion plants to apply, emissions are below the emission limit values set out in Annex II, part 2, to Directive (EU) 2015/2193.</p> <p>For plants in zones or parts of zones not complying with the air quality limit values laid down in Directive 2008/50/EC, results of the information exchange,<sup>134</sup> which are published by the Commission in accordance with Article 6, paragraphs 9 and 10, of Directive (EU) 2015/2193 are taken into account.</p> <p>In case of anaerobic digestion of organic material, where the produced digestate is used as fertiliser or soil improver, either directly or after composting or any other treatment, it meets the requirements for fertilising materials set out in Component Material Categories (CMC) 4 and 5 in Annex II to Regulation (EU) 2019/1009 or national rules on fertilisers or soil improvers for agricultural use.</p> <p>For anaerobic digestion plants treating over 100 tonnes per day, emissions to air and water are within or lower than the emission levels associated with the best available techniques (BAT-AEL) ranges set for anaerobic treatment of waste in the latest relevant best available techniques (BAT) conclusions, including the best available techniques (BAT) conclusions for waste treatment.<sup>135</sup> No significant cross-media effects occur.</p>	<p>Generali confirms that it will adhere to the requirements with EU as the EU directives and EU regulations will be transposed as national regulation within all EU members states.</p> <p>Based on the above, Sustainalytics assessed this to be aligned with the EU Taxonomy criteria.</p>	<p>Aligned</p>

<sup>133</sup> Implementing Decision (EU) 2017/1442.

<sup>134</sup> The final technology report resulting from the exchange of information with Member States, the industries concerned and non-governmental organisations contains technical information on best available technologies used in medium combustion plants to reduce their environmental impacts, and on the emission levels achievable with best available and emerging technologies and the related costs : <https://circabc.europa.eu/ui/group/06f33a94-9829-4eee-b187-21bb783a0fbf/library/9a99a632-9ba8-4cc0-9679-08d929afda59/details>.

<sup>135</sup> Implementing Decision (EU) 2018/1147.

Protection and restoration of biodiversity and ecosystems	Refer to the assessment set out in Appendix 3, Table 39	Aligned
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Table 15

Framework Activity assessed		Energy Efficiency	
EU Taxonomy Activity		3.1. Manufacture of renewable energy technologies	
Associated NACE Codes		C25, C27 and C28	
EU Technical Screening Criteria		Alignment with Technical Screening Criteria	
Mitigation	The economic activity manufactures renewable energy technologies.	Aligned by default	Aligned
DNSH Criteria		Alignment with DNSH Criteria	
Climate change adaptation	Refer to the assessment set out in Appendix 3, Table 36		Aligned
Sustainable use and protection of water and marine resources	Refer to the assessment set out in Appendix 3, Table 37		Aligned
Transition to a circular economy	<p>The activity assesses the availability of and, where feasible, adopts techniques that support:</p> <ul style="list-style-type: none"> <li>a) reuse and use of secondary raw materials and re-used components in products manufactured;</li> <li>b) design for high durability, recyclability, easy disassembly and adaptability of products manufactured;</li> <li>c) waste management that prioritizes recycling over disposal, in the manufacturing process;</li> <li>d) information on and traceability of substances of concern throughout the lifecycle of the manufactured products.</li> </ul>	<p>Generali confirms to Sustainalytics that it relies on the legislation for Waste Electrical and Electronic equipment (EU Waste Electrical &amp; Electronic Equipment Directive 2012/19/EU) which is built on waste hierarchy concept, which is transposed into national legislation within EU member states.</p> <p>Further, Generali confirms that Ecodesign Directive 2009/125/EC on improving circularity will be adhered to, as it will be transposed into national regulations within EU member states.</p>	Aligned

		<p>Based on the above, Sustainalytics assessed this to be aligned with the EU Taxonomy criteria.</p>	
<p>Pollution prevention and control</p>	<p>The activity complies with the criteria set out in Appendix C to the Annex I of the Climate Delegated Act.</p>	<p>Generali confirms that all national regulatory requirements applicable in the Countries, as follows:</p> <ul style="list-style-type: none"> <li>- Regulation (EU) 2019/1021 on persistent organic pollutants is implemented in the United Kingdom (UK) by The Persistent Organic Pollutants Regulations 2007. The regulation enforces Community provisions of Regulation (EC) No. 850/2004 relating to production, placing on the market and use of specified substances, stockpiles of specified substances and waste management and disposal.</li> <li>- Regulation (EU) 2017/852 is implemented in the United Kingdom (UK) by The Control of Mercury (Enforcement) Regulations 2017 (referred to as the Control of Mercury Regulations. These regulations provide for offences, penalties and enforcement powers in support of the EU's Mercury Regulation.</li> <li>- Regulation (EC) No 1005/2009 is implemented in the United Kingdom (UK) by The Ozone-Depleting Substances Regulations 2015. The consolidated regulations concern the production import, export and placing on the market of ozone-depleting substances, statutory testing of units containing these substances and minimum qualifications for the testing, recovery, recycling, reclamation or destruction of ozone-depleting substances.</li> <li>- Directive 2011/65/EU92 is implemented in the United Kingdom (UK) by The Restriction of the Use of Certain Hazardous Substances in Electrical and Electronic Equipment (Amendment) Regulations 2021. The Schedule contains a list of substances which are restricted in electrical and electronic equipment (EEE), together with maximum concentration values by weight of those substances in homogeneous materials which may be contained in EEE placed on the market. These maintain the restrictions and maximum concentration values set out in an EU Directive which applied before the end of the transition period. The correction concerns an error in the maximum concentration value specified for cadmium.</li> <li>- Regulation (EC) 1907/2006 is implemented in the United Kingdom (UK) by The EU REACH Regulation. REACH is a regulation of the EU, adopted to improve the protection of human health and the environment from the risks that can be posed by chemicals, while enhancing the competitiveness of the EU chemicals industry.</li> </ul> <p>Refer to the assessment set out in Appendix 3, Table 38</p>	<p>Aligned</p>

		Based on the above, Sustainalytics assessed this to be aligned with the EU Taxonomy criteria.	
Protection and restoration of biodiversity and ecosystems	Refer to the assessment set out in Appendix 3, Table 39		Aligned

Table 16

Framework Activity assessed		Energy Efficiency	
EU Taxonomy Activity		7.3. Installation, maintenance and repair of energy efficiency equipment	
Associated NACE Codes		F42, F43, M71, C16, C17, C22, C23, C25, C27, C28, S95.21, S95.22 and C33.12	
EU Technical Screening Criteria		Alignment with Technical Screening Criteria	
Mitigation	<p>The activity consists in one of the following individual measures provided that they comply with minimum requirements set for individual components and systems in the applicable national measures implementing Directive 2010/31/EU and, where applicable, are rated in the highest two populated classes of energy efficiency in accordance with Regulation (EU) 2017/1369 and delegated acts adopted under that Regulation:</p> <ul style="list-style-type: none"> <li>a) addition of insulation to existing envelope components, such as external walls (including green walls), roofs (including green roofs), lofts, basements and ground floors (including measures to ensure air-tightness, measures to reduce the effects of thermal bridges and scaffolding) and products for the application of the insulation to the building envelope (including mechanical fixings and adhesive);</li> <li>b) replacement of existing windows with new energy efficient windows;</li> <li>c) replacement of existing external doors with new energy efficient doors;</li> <li>d) installation and replacement of energy efficient light sources;</li> <li>e) installation, replacement, maintenance and repair of heating, ventilation and air conditioning (HVAC) and water heating systems, including equipment related to district heating services, with highly efficient technologies;</li> </ul>	<p>Generali confirmed to Sustainalytics that criteria a) to e) will be met for this activity.</p> <p>f) Refer to the assessment set out in Appendix 3, Table 40</p> <p>Based on the above, Sustainalytics assessed this to be aligned with the EU Taxonomy criteria.</p>	Aligned

	f) installation of low water and energy using kitchen and sanitary water fittings which comply with technical specifications set out in Appendix E to the Annex I of the Climate Delegated Act and, in case of shower solutions, mixer showers, shower outlets and taps, have a max water flow of 6 L/min or less attested by an existing label in the Union market.		
<b>DNSH Criteria</b>		<b>Alignment with DNSH Criteria</b>	
Climate change adaptation	Refer to the assessment set out in Appendix 3, Table 36		Aligned
Pollution prevention and control	<p>Building components and materials comply with the criteria set out in Appendix C to the Annex I of the Climate Delegated Act.</p> <p>In case of addition of thermal insulation to an existing building envelope, a building survey is carried out in accordance with national law by a competent specialist with training in asbestos surveying. Any stripping of lagging that contains or is likely to contain asbestos, breaking or mechanical drilling or screwing or removal of insulation board, tiles and other asbestos containing materials is carried out by appropriately trained personnel, with health monitoring before, during and after the works, in accordance with national law.</p>	<p>Generali confirmed to Sustainalytics that in case of addition of thermal insulation to an existing building envelope, a building survey will have to be carried in accordance with national law by a competent specialist with training in asbestos surveying.</p> <p>Refer to the assessment set out in Appendix 3, Table 38</p> <p>Based on the above, Sustainalytics assessed this to be aligned with the EU Taxonomy criteria.</p>	Aligned

Table 17

<b>Framework Activity assessed</b>		Energy Efficiency	
<b>EU Taxonomy Activity</b>		7.4 Installation, maintenance and repair of charging stations for electric vehicles in buildings (and parking spaces attached to buildings)	
<b>Associated NACE Codes</b>		F42, F43, M71, C16, C17, C22, C23, C25, C27 and C28	
<b>EU Technical Screening Criteria</b>		<b>Alignment with Technical Screening Criteria</b>	
Mitigation	Installation, maintenance or repair of charging stations for electric vehicles.	<p>Generali confirmed to Sustainalytics that all the criteria will be met for this activity.</p> <p>Based on the above, Sustainalytics assessed this to be aligned with the EU Taxonomy criteria.</p>	Aligned
<b>DNSH Criteria</b>		<b>Alignment with DNSH Criteria</b>	
Climate change adaptation	Refer to the assessment set out in Appendix 3, Table 36		Aligned

Table 18

Framework Activity assessed		Energy Efficiency	
EU Taxonomy Activity		7.5. Installation, maintenance and repair of instruments and devices for measuring, regulation and controlling energy performance of buildings	
Associated NACE Codes		F42, F43, M71, C16, C17, C22, C23, C25, C27 and C28	
EU Technical Screening Criteria		Alignment with Technical Screening Criteria	
Mitigation	The activity consists in one of the following individual measures: a) installation, maintenance and repair of zoned thermostats, smart thermostat systems and sensing equipment, including motion and day light control; b) installation, maintenance and repair of building automation and control systems, building energy management systems (BEMS), lighting control systems and energy management systems (EMS); c) installation, maintenance and repair of smart meters for gas, heat, cool and electricity; d) installation, maintenance and repair of façade and roofing elements with a solar shading or solar control function, including those that support the growing of vegetation.	Generali confirmed to Sustainalytics that all the criteria will be met for this activity.  Based on the above, Sustainalytics assessed this to be aligned with the EU Taxonomy criteria.	Aligned
DNSH Criteria		Alignment with DNSH Criteria	
Climate change adaptation	Refer to the assessment set out in Appendix 3, Table 36		Aligned

Table 19

Framework Activity assessed		Energy Efficiency	
EU Taxonomy Activity		7.6. Installation, maintenance and repair of renewable energy technologies	
Associated NACE Codes		F42, F43, M71, C16, C17, C22, C23, C25, C27 and C28	
EU Technical Screening Criteria		Alignment with Technical Screening Criteria	
Mitigation	The activity consists in one of the following individual measures, if installed on-site as technical building systems: a) installation, maintenance and repair of solar photovoltaic systems and the ancillary technical equipment; b) installation, maintenance and repair of solar hot water panels and the ancillary technical equipment; c) installation, maintenance, repair and upgrade of heat pumps contributing to the targets for renewable energy in heat and cool	Generali confirmed to Sustainalytics that all the criteria will be met for this activity.  Based on the above, Sustainalytics assessed this to be aligned with the EU Taxonomy criteria.	Aligned

	<p>in accordance with Directive (EU) 2018/2001 and the ancillary technical equipment;</p> <p>d) installation, maintenance and repair of wind turbines and the ancillary technical equipment;</p> <p>e) installation, maintenance and repair of solar transpired collectors and the ancillary technical equipment;</p> <p>f) installation, maintenance and repair of thermal or electric energy storage units and the ancillary technical equipment;</p> <p>g) installation, maintenance and repair of high efficiency micro-CHP (combined heat and power) plant;</p> <p>h) installation, maintenance and repair of heat exchanger/recovery systems.</p>		
<b>DNSH Criteria</b>		<b>Alignment with DNSH Criteria</b>	
Climate change adaptation	Refer to the assessment set out in Appendix 3, Table 36		Aligned

Table 20

<b>Framework Activity assessed</b>		Clean Transportation	
<b>EU Taxonomy Activity</b>		6.1 Passenger interurban rail transport	
<b>Associated NACE Codes</b>		H49.10 and N77.39	
<b>EU Technical Screening Criteria</b>		<b>Alignment with Technical Screening Criteria</b>	
Mitigation	<p>The activity complies with one of the following criteria:</p> <p>a) the trains and passenger coaches have zero direct (tailpipe) CO<sub>2</sub> emissions;</p> <p>b) the trains and passenger coaches have zero direct (tailpipe) CO<sub>2</sub> emission when operated on a track with necessary infrastructure, and use a conventional engine where such infrastructure is not available (bimode).</p>	<p>Sustainalytics notes that the Framework includes the financing of electric, hydrogen or otherwise zero direct (tailpipe) CO<sub>2</sub> emissions vehicles for the transportation of passengers or freight which is aligned with these criteria.</p> <p>Based on the above, Sustainalytics assessed this to be aligned with the EU Taxonomy criteria.</p>	Aligned
<b>DNSH Criteria</b>		<b>Alignment with DNSH Criteria</b>	
Climate change adaptation	Refer to the assessment set out in Appendix 3, Table 36		Aligned

Transition to a circular economy	Measures are in place to manage waste in accordance with the waste hierarchy, in particular during maintenance.	Generali confirmed to Sustainalytics that for all member states of the European Union it will rely on the Directive 2000/53/EC and Directive 2005/64/EC transposed into national legislation.  Based on the above, Sustainalytics assessed this to be aligned with the EU Taxonomy criteria.	Aligned
Pollution prevention and control	Engines for the propulsion of railway locomotives (RLL) and engines for the propulsion of railcars (RLR) comply with emission limits set out in Annex II to Regulation (EU) 2016/1628 of the European Parliament and of the Council. <sup>136</sup>	Generali confirmed to Sustainalytics that for all member states of the European Union, it will rely on Regulation (EC) No. 715/2007 and Regulation (EU) No 540/2014 transposed into national legislation. Additionally, it will rely on the EU Regulation 2016/1628 transposed into national legislation. This regulation sets out pollutant emission limits for engines of different power ranges and applications for non-road mobile machinery (NRMM) with the aim of gradually reducing emissions and phasing out equipment with the most polluting engines.  Based on the above, Sustainalytics assessed this to be aligned with the EU Taxonomy criteria.	Aligned

Table 21

<b>Framework Activity assessed</b>		Clean Transportation	
<b>EU Taxonomy Activity</b>		6.2 Freight rail transport	
<b>Associated NACE Codes</b>		H49.20 and N77.39	
<b>EU Technical Screening Criteria</b>		<b>Alignment with Technical Screening Criteria</b>	
Mitigation	<ol style="list-style-type: none"> <li>1. The activity complies with one or both of the following criteria: <ol style="list-style-type: none"> <li>a) the trains and wagons have zero direct tailpipe CO<sub>2</sub> emission;</li> <li>b) the trains and wagons have zero direct tailpipe CO<sub>2</sub> emission when operated on a track with necessary infrastructure, and use a conventional engine where such infrastructure is not available (bimode).</li> </ol> </li> <li>2. The trains and wagons are not dedicated to the transport of fossil fuels.</li> </ol>	<ol style="list-style-type: none"> <li>1. Generali confirmed that the Framework refers to full compliance with the criteria. Generali contemplates financing both options.</li> <li>2. Generali confirmed criterion.</li> </ol> <p>Based on the above, Sustainalytics assessed this to be aligned with the EU Taxonomy criteria.</p>	Aligned
<b>DNSH Criteria</b>		<b>Alignment with DNSH Criteria</b>	

<sup>136</sup> Regulation (EU) 2016/1628 of the European Parliament and of the Council of 14 September 2016 on requirements relating to gaseous and particulate pollutant emission limits and type-approval for internal combustion engines for non-road mobile machinery, amending Regulations (EU) No 1024/2012 and (EU) No 167/2013, and amending and repealing Directive 97/68/EC (OJ L 252, 16.9.2016, p. 53).

Climate change adaptation	Refer to the assessment set out in Appendix 3, Table 36		Aligned
Transition to a circular economy	Measures are in place to manage waste in accordance with the waste hierarchy, in particular during maintenance.	<p>Generali confirmed to Sustainalytics that for all member states of the European Union, it will rely on the Directive 2000/53/EC and Directive 2005/64/EC transposed into national legislation.</p> <p>Based on the above, Sustainalytics assessed this to be aligned with the EU Taxonomy criteria.</p>	Aligned
Pollution prevention and control	Engines for the propulsion of railway locomotives (RLL) and engines for the propulsion of railcars (RLR) comply with emission limits set out in Annex II to Regulation (EU) 2016/1628.	<p>Generali confirmed to Sustainalytics that for all member states of the European Union, it will rely on Regulation (EC) No. 715/2007 and Regulation (EU) No 540/2014 transposed into national legislation. Additionally, it will rely on the EU Regulation 2016/1628 transposed into national legislation. This regulation sets out pollutant emission limits for engines of different power ranges and applications for non-road mobile machinery (NRMM) with the aim of gradually reducing emissions and phasing out equipment with the most polluting engines.</p> <p>Based on the above, Sustainalytics assessed this to be aligned with the EU Taxonomy criteria.</p>	Aligned

Table 22

<b>Framework Activity assessed</b>		Clean Transportation	
<b>EU Taxonomy Activity</b>		6.3 Urban and suburban transport, road passenger transport	
<b>Associated NACE Codes</b>		H49.31, H49.3.9, N77.39 and N77.11	
<b>EU Technical Screening Criteria</b>		<b>Alignment with Technical Screening Criteria</b>	
Mitigation	<p>The activity complies with the one of following criteria:</p> <p>a) the activity provides urban or suburban passenger transport and its direct (tailpipe) CO<sub>2</sub> emissions are zero;<sup>137</sup></p> <p>b) until 31 December 2025, the activity provides interurban passenger road transport using vehicles designated as categories M2 and M3<sup>138</sup> that have a type of bodywork classified as 'CA' (single-deck vehicle),<sup>139</sup> 'CB' (double-deck vehicle), 'CC' (singledeck articulated vehicle) or 'CD' (double-</p>	<p>Generali confirmed to Sustainalytics that projects will comply with criterion a) and that criterion b) is not contemplated under the Framework.</p> <p>Based on the above, Sustainalytics assessed this to be aligned with the EU Taxonomy criteria.</p>	Aligned

<sup>137</sup> This includes Motor buses with type of bodywork classified as 'CE' (low-floor single-deck vehicle), 'CF' (low-floor double-deck vehicle), 'CG' (Articulated low-floor single-deck vehicle), 'CH' (Articulated low-floor double-deck vehicle), 'CI' (open top single deck vehicle) or 'CJ' (open top double deck vehicle), as set out in point 3 of part C of Annex I to Regulation (EU) 2018/858.

<sup>138</sup> As referred to in Article 4(1), point (a), of Regulation (EU) 2018/858.

<sup>139</sup> As set out in point 3 of part C of Annex I to Regulation (EU) 2018/858.

	deck articulated vehicle), and comply with the latest EURO VI standard, i.e. both with the requirements of Regulation (EC) No 595/2009 and, from the time of the entry into force of amendments to that Regulation, in those amending acts, even before they become applicable, and with the latest step of the Euro VI standard set out in Table 1 of Appendix 9 to Annex I to Regulation (EU) No 582/2011 where the provisions governing that step have entered into force but have not yet become applicable for this type of vehicle. <sup>140</sup> Where such standard is not available, the direct CO <sub>2</sub> emissions of the vehicles are zero.		
<b>DNSH Criteria</b>		<b>Alignment with DNSH Criteria</b>	
Climate change adaptation	Refer to the assessment set out in Appendix 3, Table 36		Aligned
Transition to a circular economy	Measures are in place to manage waste, in accordance with the waste hierarchy, both in the use phase (maintenance) and the end-of-life of the fleet, including through reuse and recycling of batteries and electronics (in particular critical raw materials therein).	Generali confirmed to Sustainalytics that it will rely on the Waste Framework Directive (2008/98/EC) which says that member states must achieve 70 per cent of material recovery of non-hazardous, non-soil and stone C&D waste, by 2020.  Based on the above, Sustainalytics assessed this to be aligned with the EU Taxonomy criteria.	Aligned
Pollution prevention and control	For road vehicles of categories M, tyres comply with external rolling noise requirements in the highest populated class and with Rolling Resistance Coefficient (influencing the vehicle energy efficiency) in the two highest populated classes as set out in Regulation (EU) 2020/740 of the European Parliament and of the Council <sup>141</sup> and as can be verified from the European Product Registry for Energy Labelling (EPREL).  Where applicable, vehicles comply with the requirements of the most recent applicable stage of the Euro VI heavy duty emission type approval set out in accordance with Regulation (EC) No 595/2009.	Generali confirmed to Sustainalytics that it will rely on the EU regulations to be transposed into national legislation within EU member states.  Based on the above, Sustainalytics assessed this to be aligned with the EU Taxonomy criteria.	Aligned

Table 23

<b>Framework Activity assessed</b>	Clean Transportation
<b>EU Taxonomy Activity</b>	6.5. Transport by motorbikes, passenger cars and light commercial vehicles

<sup>140</sup> Until 31/12/2021, the EURO VI, step E as set out in Regulation (EC) No 595/2009.

<sup>141</sup> Regulation (EU) 2020/740 of the European Parliament and of the Council of 25 May 2020 on the labelling of tyres with respect to fuel efficiency and other parameters, amending Regulation (EU) 2017/1369 and repealing Regulation (EC) No 1222/2009 (OJ L 177, 5.6.2020, p. 1).

Associated NACE Codes		H49.32, H49.39 and N77.11	
EU Technical Screening Criteria		Alignment with Technical Screening Criteria	
Mitigation	<p>The activity complies with the following criteria:</p> <p>a) for vehicles of category M1 and N1, both falling under the scope of Regulation (EC) No 715/2007:</p> <p>i) until 31 December 2025, specific emissions of CO<sub>2</sub>, as defined in Article 3(1), point (h), of Regulation (EU) 2019/631, are lower than 50gCO<sub>2</sub>/km (low-and zero-emission light-duty vehicles);</p> <p>ii) from 1 January 2026, specific emissions of CO<sub>2</sub>, as defined in Article 3(1), point (h), of Regulation (EU) 2019/631, are zero.</p> <p>b) for vehicles of category L, the tailpipe CO<sub>2</sub> emissions equal to 0g CO<sub>2</sub>e/km calculated in accordance with the emission test laid down in Regulation (EU) 168/2013.</p>	<p>Generali confirmed that it will only finance electric vehicles or vehicles with no tailpipe emissions.</p> <p>Based on the above, Sustainalytics assessed this to be aligned with the EU Taxonomy criteria.</p>	Aligned
DNSH Criteria		Alignment with DNSH Criteria	
Climate change adaptation	Refer to the assessment set out in Appendix 3, Table 36		Aligned
Transition to a circular economy	<p>Vehicles of categories M1 and N1 are both of the following:</p> <p>a) reusable or recyclable to a minimum of 85% by weight;</p> <p>b) reusable or recoverable to a minimum of 95% by weight.<sup>142</sup></p> <p>Measures are in place to manage waste both in the use phase (maintenance) and the end-of-life of the fleet, including through reuse and recycling of batteries and electronics (in particular critical raw materials therein), in accordance with the waste hierarchy.</p>	<p>Generali confirmed to Sustainalytics that it will rely on the Directive 2000/53/EC and Directive 2005/64/EC that will be transposed into national legislation within EU member states.</p> <p>Companies in the EU are obligated to comply with End of Life Vehicles (ELV) Directive (EU Directive 2000/53/EC) which requires the implementation of measures to ensure that a) no later than 1 January 2006, for all end-of life vehicles, the reuse and recovery shall be increased to a minimum of 85 % by an average weight per vehicle and year and b) no later than 1 January 2015, for all end-of life vehicles, the reuse and recovery shall be increased to a minimum of 95 % by an average weight per vehicle and year.</p> <p>Based on the above, Sustainalytics assessed this to be aligned with the EU Taxonomy criteria.</p>	Aligned

<sup>142</sup> As set out in Annex I of Directive 2005/64/EC of the European Parliament and of the Council of 26 October 2005 on the type-approval of motor vehicles with regard to their reusability, recyclability and recoverability and amending Council Directive 70/156/EEC (OJ L 310, 25.11.2005, p. 10).

Pollution prevention and control	<p>a) Vehicles comply with the requirements of the most recent applicable stage of the Euro 6 light-duty emission type-approval<sup>143</sup> set out in accordance with Regulation (EC) No. 715/2007.</p> <p>b) Vehicles comply with the emission thresholds for clean light-duty vehicles set out in Table 2 of the Annex I to Directive 2009/33/EC of the European Parliament and of the Council.<sup>144</sup></p> <p>c) For road vehicles of categories M and N, tyres comply with external rolling noise requirements in the highest populated class and with Rolling Resistance Coefficient (influencing the vehicle energy efficiency) in the two highest populated classes as set out in Regulation (EU) 2020/740 and as can be verified from the European Product Registry for Energy Labelling (EPREL).</p> <p>d) Vehicles comply with Regulation (EU) No 540/2014 of the European Parliament and of the Council.<sup>145</sup></p>	<p>Generali confirmed to Sustainalytics that it will rely on the Directive 2009/33/EC and other EU Regulations that will be transposed into national legislation within EU member states.</p> <p>Based on the above, Sustainalytics assessed this to be aligned with the EU Taxonomy criteria.</p>	Aligned

<b>Table 24 Framework Activity assessed</b>		Clean Transportation	
<b>EU Taxonomy Activity</b>		6.6. Freight transport services by road	
<b>Associated NACE Codes</b>		H49.4.1, H53.10, H53.20 and N77.12	
<b>EU Technical Screening Criteria</b>		<b>Alignment with Technical Screening Criteria</b>	
Mitigation	<p>1. The activity complies with one of the following criteria:</p> <p>(a) vehicles of category N1 have zero direct (tailpipe) CO<sub>2</sub> emissions;</p> <p>(b) vehicles of category N2 and N3 with a technically permissible maximum laden mass not exceeding 7,5 tonnes are 'zero-emission heavy-duty vehicles' as defined in Article 3, point (11), of Regulation (EU) 2019/1242;</p>	<p>1. Generali confirmed to Sustainalytics that the Framework includes the financing of electric, hydrogen or otherwise zero direct (tailpipe) CO<sub>2</sub> emissions vehicles for the transportation of passengers or freight which is aligned with the EU Taxonomy criteria.</p> <p>2. Generali confirmed this criterion.</p> <p>Based on the above, Sustainalytics assessed this to be aligned with the EU Taxonomy criteria.</p>	Aligned

<sup>143</sup> Commission Regulation (EU) 2018/1832 of 5 November 2018 amending Directive 2007/46/EC of the European Parliament and of the Council, Commission Regulation (EC) No 692/2008 and Commission Regulation (EU) 2017/1151 for the purpose of improving the emission type approval tests and procedures for light passenger and commercial vehicles, including those for in-service conformity and real-driving emissions and introducing devices for monitoring the consumption of fuel and electric energy (OJ L 301, 27.11.2018, p. 1).

<sup>144</sup> Directive 2009/33/EC of the European Parliament and of the Council of 23 April 2009 on the promotion of clean and energy-efficient road transport vehicles (OJ L 120, 15.5.2009, p. 5).

<sup>145</sup> Regulation (EU) No 540/2014 of the European Parliament and of the Council of 16 April 2014 on the sound level of motor vehicles and of replacement silencing systems, and amending Directive 2007/46/EC and repealing Directive 70/157/EEC (OJ L 158, 27.5.2014, p. 131).

	<p>(c) vehicles of category N2 and N3 with a technically permissible maximum laden mass exceeding 7,5 tonnes are one of the following:</p> <p>(i) 'zero-emission heavy-duty vehicles', as defined in Article 3, point (11), of Regulation (EU) 2019/1242;</p> <p>(ii) where technologically and economically not feasible to comply with the criterion in point (i), 'low-emission heavy-duty vehicles' as defined in Article 3, point (12), of that Regulation.</p> <p>2. Vehicles are not dedicated to the transport of fossil fuels.</p>		
DNSH Criteria		Alignment with DNSH Criteria	
Climate change adaptation	Refer to the assessment set out in Appendix 3, Table 36		Aligned
Transition to a circular economy	<p>Vehicles of category N1, N2 and N3 are both of the following:</p> <p>(a) reusable or recyclable to a minimum of 85% by weight;</p> <p>(b) reusable or recoverable to a minimum of 95% by weight.<sup>146</sup></p> <p>Measures are in place to manage waste both in the use phase (maintenance) and the end-of-life of the fleet, including through reuse and recycling of batteries and electronics (in particular critical raw materials therein), in accordance with the waste hierarchy.</p>	<p>Generali confirmed to Sustainalytics that it will rely on the Directive 2000/53/EC and Directive 2005/64/EC transposed into national legislation within EU member states.</p> <p>Companies IN the EU are obligated to comply with End of Life Vehicles (ELV) Directive (EU Directive 2000/53/EC) which requires the implementation of measures to ensure that a) no later than 1 January 2006, for all end-of life vehicles, the reuse and recovery shall be increased to a minimum of 85 % by an average weight per vehicle and year and b) no later than 1 January 2015, for all end-of life vehicles, the reuse and recovery shall be increased to a minimum of 95 % by an average weight per vehicle and year.</p> <p>Based on the above, Sustainalytics assessed this to be aligned with the EU Taxonomy criteria.</p>	Aligned

<sup>146</sup> As set out in Annex I to Directive 2005/64/EC

Pollution prevention and control	<p>For road vehicles of categories M and N, tyres comply with external rolling noise requirements in the highest populated class and with Rolling Resistance Coefficient (influencing the vehicle energy efficiency) in the two highest populated classes as set out in Regulation (EU) 2020/740 and as can be verified from the European Product Registry for Energy Labelling (EPREL). Vehicles comply with the requirements of the most recent applicable stage of the Euro VI heavy duty emission type-approval<sup>147</sup> set out in accordance with Regulation (EC) No 595/2009.</p> <p>Vehicles comply with Regulation (EU) No 540/2014.</p>	<p>Generali confirmed to Sustainalytics that for all member states of the European Union, it will rely on Regulation (EC) No. 2020/740 and Regulation (EU) No 540/2014 transposed into national legislation.</p> <p>Regulation (EU) 2020/740 of the European Parliament and of the Council is applicable within EU. Therefore, companies within the EU are required to comply with labelling requirements as per the European Product Registry for Energy Labelling (EPREL).</p> <p>Additionally, it confirmed that vehicles comply with Regulation (EU) No 540/2014.</p> <p>Based on the above, Sustainalytics assessed this to be aligned with the EU Taxonomy criteria.</p>	Aligned
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<b>Table 25 Framework Activity assessed</b>		Clean Transportation	
<b>EU Taxonomy Activity</b>		6.13. Infrastructure for personal mobility, cycle logistics	
<b>Associated NACE Codes</b>		F42.11, F42.12, F43.21, F71.1 and F71.20	
<b>EU Technical Screening Criteria</b>		<b>Alignment with Technical Screening Criteria</b>	
Mitigation	<p>The infrastructure that is constructed and operated is dedicated to personal mobility or cycle logistics: pavements, bike lanes and pedestrian zones, electrical charging and hydrogen refuelling installations for personal mobility devices.</p>	<p>Generali confirmed to Sustainalytics that these criteria is the scope of the Framework.</p> <p>Based on the above, Sustainalytics assessed this to be aligned with the EU Taxonomy criteria.</p>	Aligned
<b>DNSH Criteria</b>		<b>Alignment with DNSH Criteria</b>	
Climate change adaptation	Refer to the assessment set out in Appendix 3, Table 36		Aligned
Sustainable use and protection of	Refer to the assessment set out in Appendix 3, Table 37		Aligned

<sup>147</sup> Commission Regulation (EU) No 582/2011 of 25 May 2011 implementing and amending Regulation (EC) No 595/2009 of the European Parliament and of the Council with respect to emissions from heavy duty vehicles (Euro VI) and amending Annexes I and III to Directive 2007/46/EC of the European Parliament and of the Council (OJ L 167, 25.6.2011, p. 1).

water and marine resources			
Transition to a circular economy	At least 70 % (by weight) of the non-hazardous construction and demolition waste (excluding naturally occurring material referred to in category 17 05 04 in the European List of Waste established by Commission Decision 2000/532/EC <sup>148</sup> ) generated on the construction site is prepared for reuse, recycling and other material recovery, including backfilling operations using waste to substitute other materials, in accordance with the waste hierarchy and the EU Construction and Demolition Waste Management Protocol <sup>149</sup> . Operators limit waste generation in processes related to construction and demolition, in accordance with the EU Construction and Demolition Waste Management Protocol, taking into account best available techniques and using selective demolition to enable removal and safe handling of hazardous substances and facilitate reuse and high quality recycling by selective removal of materials, using available sorting systems for construction and demolition waste.	Generali confirmed to Sustainalytics that it will rely on the Directive 2000/53/EC and Directive 2008/98/EC transposed into national legislation. The directive requires 70 per cent of material recovery of non-hazardous, non-soil and stone construction and demolition waste.  Based on the above, Sustainalytics assessed this to be aligned with the EU Taxonomy criteria.	Aligned
Pollution prevention and control	Measures are taken to reduce noise, dust and pollutant emissions during construction or maintenance works.	Generali confirmed to Sustainalytics that this will be included in the due diligence process for the investments.	Aligned
Protection and restoration of biodiversity and ecosystems	Refer to the assessment set out in Appendix 3, Table 39		

<b>Table 26 Framework Activity assessed</b>	Clean Transportation
<b>EU Taxonomy Activity</b>	6.14. Infrastructure for rail transport
<b>Associated NACE Codes</b>	F42.12, F42.13, M71.12, M71.20, F43.21, and H52.21

<sup>148</sup> Commission Decision 2000/532/EC of 3 May 2000 replacing Decision 94/3/EC establishing a list of wastes pursuant to Article 1(a) of Council Directive 75/442/EEC on waste and Council Decision 94/904/EC establishing a list of hazardous waste pursuant to Article 1(4) of Council Directive 91/689/EEC on hazardous waste (OJ L 226, 6.9.2000, p. 3).

<sup>149</sup> EU Construction and Demolition Waste Protocol : [https://ec.europa.eu/growth/content/eu-construction-and-demolition-waste-protocol-0\\_en](https://ec.europa.eu/growth/content/eu-construction-and-demolition-waste-protocol-0_en).

EU Technical Screening Criteria		Alignment with Technical Screening Criteria	
Mitigation	<p>1. The activity complies with one of the following criteria:                      (a) the infrastructure (as defined in Annex II.2 to Directive (EU) 2016/797 of the European Parliament and of the Council<sup>150</sup>) is either :</p> <p>(i) electrified trackside infrastructure and associated subsystems: infrastructure, energy, on-board control-command and signalling, and trackside control command and signalling subsystems as defined in Annex II.2 to Directive (EU)2016/797;</p> <p>(ii) new and existing trackside infrastructure and associated subsystems where there is a plan for electrification as regards line tracks, and, to the extent necessary for electric train operations, as regards sidings, or where the infrastructure will be fit for use by zero tailpipe CO<sub>2</sub> emission trains within 10 years from the beginning of the activity: infrastructure, energy, on-board control-command and signalling, and trackside control-command and signalling subsystems as defined in Annex II.2 to Directive (EU)2016/797;</p> <p>(iii) until 2030, existing trackside infrastructure and associated subsystems that are not part of the TEN-T network<sup>151</sup> and its indicative extensions to third countries, nor any nationally, supranationally or internationally defined network of major rail lines: infrastructure, energy, on-board control-command and signalling, and trackside control-command and signalling subsystems as defined in Annex II.2 to Directive (EU) 2016/797;</p> <p>(b) the infrastructure and installations are dedicated to transshipping freight between the modes: terminal infrastructure and superstructures for loading, unloading and transshipment of goods;</p> <p>(c) infrastructure and installations are dedicated to the transfer of passengers from rail to rail or from other modes to rail.</p> <p>2. The infrastructure is not dedicated to the transport or storage of fossil fuels.</p>	<p>1. Generali confirmed to Sustainalytics that it will comply with (a)(i) and (a)(ii), while (a)(iii) is not currently contemplated.</p> <p>2. Generali confirmed that it will meet this criterion</p> <p>Based on the above, Sustainalytics assessed this to be aligned with the EU Taxonomy criteria.</p>	Aligned
DNSH Criteria		Alignment with DNSH Criteria	
Climate change adaptation	Refer to the assessment set out in Appendix 3, Table 36		Aligned

<sup>150</sup> Directive (EU) 2016/797 of the European Parliament and of the Council of 11 May 2016 on the interoperability of the rail system within the European Union (OJ L 138, 26.5.2016, p. 44).

<sup>151</sup> In accordance with Regulation (EU) No 1315/2013 of the European Parliament and of the Council of 11 December 2013 on Union guidelines for the development of the trans-European transport network and repealing Decision No 661/2010/EU (OJ L 348, 20.12.2013, p. 1).

Sustainable use and protection of water and marine resources	Refer to the assessment set out in Appendix 3, Table 37		Aligned
Transition to a circular economy	At least 70% (by weight) of the non-hazardous construction and demolition waste (excluding naturally occurring material defined in category 17 05 04 in the European List of Waste established by Decision 2000/532/EC) generated on the construction site is prepared for reuse, recycling and other material recovery, including backfilling operations using waste to substitute other materials, in accordance with the waste hierarchy and the EU Construction and Demolition Waste Management Protocol. <sup>152</sup> Operators limit waste generation in processes related construction and demolition, in accordance with the EU Construction and Demolition Waste Management Protocol and taking into account best available techniques and using selective demolition to enable removal and safe handling of hazardous substances and facilitate reuse and high-quality recycling by selective removal of materials, using available sorting systems for construction and demolition waste.	Generali confirmed to Sustainalytics that it will rely on the Directive 2000/53/EC and Directive 2008/98/EC transposed into national legislation within EU member states. The directive requires 70 per cent of material recovery of non-hazardous, non-soil and stone construction and demolition waste.  Based on the above, Sustainalytics assessed this to be aligned with the EU Taxonomy criteria.	Aligned
Pollution prevention and control	Where appropriate, given the sensitivity of the area affected, in particular in terms of the size of population affected, noise and vibrations from use of infrastructure are mitigated by introducing open trenches, wall barriers, or other measures and comply with Directive 2002/49/EC of the European Parliament and of the Council. <sup>153</sup>  Measures are taken to reduce noise, dust and pollutant emissions during construction or maintenance works.	Generali confirms to Sustainalytics that it will comply with Directive 2002/49/EC that defined environmental noise as unwanted or harmful outdoor sound created by human activities (Article 3(a)). In case Generali finances a similar project, prior to inclusion within the pool, it will be necessary to check the regulation is respected and measures to reduce noise, dust and pollutant emissions are established.  Based on the above, Sustainalytics assessed this to be aligned with the EU Taxonomy criteria.	Aligned
Protection and restoration of biodiversity and ecosystems	Refer to the assessment set out in Appendix 3, Table 39		Aligned

<sup>152</sup> EU Construction and Demolition Waste Protocol : [https://ec.europa.eu/growth/content/eu-construction-and-demolition-waste-protocol-0\\_en](https://ec.europa.eu/growth/content/eu-construction-and-demolition-waste-protocol-0_en)).

<sup>153</sup> Directive 2002/49/EC of the European Parliament and of the Council of 25 June 2002 relating to the assessment and management of environmental noise (OJ L 189, 18.7.2002, p. 12).

<i>Table 27</i> <b>Framework Activity assessed</b>		Clean Transportation	
<b>EU Taxonomy Activity</b>		6.15. Infrastructure enabling low-carbon road transport and public transport	
<b>Associated NACE Codes</b>		F42.11, F42.13, F71.1 and F71.20	
<b>EU Technical Screening Criteria</b>		<b>Alignment with Technical Screening Criteria</b>	
Mitigation	<p>1. The activity complies with one or more of the following criteria:</p> <p>(a) the infrastructure is dedicated to the operation of vehicles with zero tailpipe CO<sub>2</sub> emissions: electric charging points, electricity grid connection upgrades, hydrogen fuelling stations or electric road systems (ERS);</p> <p>(b) the infrastructure and installations are dedicated to transshipping freight between the modes: terminal infrastructure and superstructures for loading, unloading and transshipment of goods;</p> <p>(c) the infrastructure and installations are dedicated to urban and suburban public passenger transport, including associated signalling systems for metro, tram and rail systems.</p> <p>2. The infrastructure is not dedicated to the transport or storage of fossil fuels.</p>	<p>1. Sustainalytics notes that the Framework includes infrastructure related zero carbon public and mass transportation such as EV charging stations, hydrogen fuelling stations which fulfil these criteria.</p> <p>2. Generali confirmed that it will meet this criterion</p> <p>Based on the above, Sustainalytics assessed this to be aligned with the EU Taxonomy criteria.</p>	Aligned
<b>DNSH Criteria</b>		<b>Alignment with DNSH Criteria</b>	
Climate change adaptation	Refer to the assessment set out in Appendix 3, Table 36		Aligned
Sustainable use and protection of water and marine resources	Refer to the assessment set out in Appendix 3, Table 37		Aligned

<p>Transition to a circular economy</p>	<p>At least 70 % (by weight) of the non-hazardous construction and demolition waste (excluding naturally occurring material defined in category 17 05 04 in the European List of Waste established by Decision 2000/532/EC) generated on the construction site is prepared for reuse, recycling and other material recovery, including backfilling operations using waste to substitute other materials, in accordance with the waste hierarchy and the EU Construction and Demolition Waste Management Protocol.<sup>154</sup> Operators limit waste generation in processes related construction and demolition, in accordance with the EU Construction and Demolition Waste Management Protocol and taking into account best available techniques and using selective demolition to enable removal and safe handling of hazardous substances and facilitate reuse and high-quality recycling by selective removal of materials, using available sorting systems for construction and demolition waste.</p>	<p>Generali confirmed to Sustainalytics that for all member states of the European Union, it will rely on the Directive 2018/851 transposed into national regulation. Additionally, the Directive 2008/98/EC outlines that by 2020, the preparing for reuse, recycling and other material recovery, including backfilling operations using waste to substitute other materials, of non-hazardous construction and demolition waste excluding naturally occurring material defined in category 17 05 04 in the list of waste shall be increased to a minimum of 70 % by weight.</p> <p>Based on the above, Sustainalytics assessed this to be aligned with the EU Taxonomy criteria.</p>	<p>Aligned</p>
<p>Pollution prevention and control</p>	<p>Where relevant, noise and vibrations from use of infrastructure are mitigated by introducing open trenches, wall barriers or other measures and comply with Directive 2002/49/EC.</p> <p>Measures are taken to reduce noise, dust and pollutant emissions during construction or maintenance works.</p>	<p>Generali confirmed to Sustainalytics that it abides by Directive 2002/49/EC of EU which aims at creating a common language for assessment and management of environmental noise.</p> <p>Additionally, Generali confirmed that it complies with Directive 2002/49/EC defined environmental noise as unwanted or harmful outdoor sound created by human activities (Article 3(a)). In case Generali finances a similar project, prior to inclusion within the pool, it will check the regulation is respected and that measures to reduce noise, dust and pollutant emissions are established.</p> <p>Based on the above, Sustainalytics assessed this to be aligned with the EU Taxonomy criteria.</p>	<p>Aligned</p>
<p>Protection and restoration of biodiversity and ecosystems</p>	<p>The activity complies with the criteria set out in Appendix D to the Annex I.</p> <p>Where relevant, maintenance of vegetation along road transport infrastructure ensures that invasive species do not spread.</p> <p>Mitigation measures have been implemented to avoid wildlife collisions.</p>	<p>Generali confirmed that the infrastructure related to zero carbon public and mass transportation such as EV charging stations, hydrogen fuelling stations will not be in or near an biodiversity sensitive area. Hence, Sustainalytics notes that this is not applicable for the projects under this category in the Framework.</p>	<p>Aligned</p>

<p><b>Table 28 Framework Activity assessed</b></p>	<p>Climate Adaptation Measures</p>
<p><b>EU Taxonomy Activity</b></p>	<p>2.1. Restoration of wetlands</p>

<sup>154</sup> EU Construction and Demolition Waste Protocol : [https://ec.europa.eu/growth/content/eu-construction-and-demolition-waste-protocol-0\\_en](https://ec.europa.eu/growth/content/eu-construction-and-demolition-waste-protocol-0_en)).

Associated NACE Code		N/A	
EU Technical Screening Criteria		Alignment with Technical Screening Criteria	
Mitigation	<p>1. Restoration plan</p> <p>1.1. The area is covered by a restoration plan, which is consistent with the Ramsar Convention’s principles and guidelines on wetland restoration<sup>155</sup>, until the area is classified as a wetland and is covered by a wetland management plan, consistent with the Ramsar Convention’s guidelines for management planning for Ramsar sites and other wetlands<sup>156</sup>. For peatlands, the restoration plan follows the recommendations contained in relevant resolutions of the Ramsar Convention, including the resolution XIII/13.</p> <p>1.2. The restoration plan contains careful consideration of local hydrological and pedological conditions, including the dynamics of soil saturation and the change of aerobic and anaerobic conditions.</p> <p>1.3. All wetland management relevant DNSH criteria are addressed in the restoration plan.</p> <p>1.4. The restoration plan provides for monitoring which ensures the correctness of the information contained in the plan, in particular as regards the data relating to the involved area.</p> <p>2. Climate benefit analysis</p> <p>2.1. The activity complies with the following criteria:</p> <p>(a) the climate benefit analysis demonstrates that the net balance of GHG emissions and removals generated by the activity over a period of 30 years after the beginning of the activity is lower than a baseline, corresponding to the balance of GHG emissions and removals over a period of 30 years starting at the beginning of the activity, associated to the business-as-usual practices that would have occurred on the involved area in the absence of the activity;</p> <p>(b) the projected long-term average net GHG balance of the activity is lower than the long-term average GHG balance projected for the baseline, referred to in point 2.2, where long term corresponds to 100 years.</p>	<p>1. Generali confirmed this criterion and that projects under Climate Adaptation will be implemented only within EU until and if an equivalent system is defined.</p> <p>2. Generali confirmed this criterion. Projects will be included if they meet the climate benefit analysis.</p> <p>3. Generali confirmed this criterion.</p> <p>4. Generali will rely on national law for EU member states.</p> <p>5. Generali confirmed this criterion</p> <p>6. Generali confirmed this criterion</p> <p>Based on the above, Sustainability assessed this to be aligned with the EU Taxonomy criteria.</p>	Aligned

<sup>155</sup> Ramsar Convention (2002) Principles and guidelines for wetland restoration. Adopted by Resolution VIII.16 (2002) of the Ramsar Convention : <https://www.ramsar.org/sites/default/files/documents/pdf/guide/guide-restoration.pdf>.

<sup>156</sup> Ramsar Convention (2002) Resolution VIII.14 New Guidelines for management planning for Ramsar sites and other wetlands : [https://www.ramsar.org/sites/default/files/documents/pdf/res/key\\_res\\_viii\\_14\\_e.pdf](https://www.ramsar.org/sites/default/files/documents/pdf/res/key_res_viii_14_e.pdf).

<p>2.2. The calculation of climate benefit complies with all of the following criteria:</p> <p>(a) the analysis is consistent with the 2019 Refinement to the 2006 IPCC Guidelines for National Greenhouse Gas Inventories<sup>157</sup>. In particular, if the wetland definition used in that analysis differs from the wetland definition used in the national GHG inventory, the analysis includes an identification of the different land categories covered by the involved area. The climate benefit analysis is based on transparent, accurate, consistent, complete and comparable information, covers all carbon pools impacted by the activity, including above-ground biomass, below-ground biomass, deadwood, litter and soil, relies on the most conservative assumptions for calculations and includes appropriate considerations about the risks of non-permanence and reversals of carbon sequestration, the risk of saturation and the risk of leakage. For coastal wetlands, climate benefit analysis considers projections of expected relative sea level rise and the potential that the wetlands will migrate;</p> <p>(b) the business-as-usual practices, including harvesting practices, are one of the following:</p> <p style="padding-left: 40px;">(i) the management practices as documented before the start of the activity, if any;</p> <p style="padding-left: 40px;">(ii) the most recent business-as-usual practices prior to the start of the activity.</p> <p>(c) the resolution of the analysis is proportionate to the size of the area concerned and values specific to the area concerned are used;</p> <p>(d) emissions and removals that occur due to natural disturbances, such as pests and diseases infestations, fires, wind, storm damages, that impact the area and cause underperformance do not result in non-compliance with the criteria of Regulation (EU) 2020/852, provided that the climate benefit analysis is consistent with the 2019 Refinement to the 2006 IPCC Guidelines for National Greenhouse Gas Inventories regarding emissions and removals due to natural disturbances.</p> <p>4. Guarantee of permanence</p> <p>4.1. In accordance with national law, the wetland status of the area in which the activity takes place is guaranteed by one of the following measures:</p>		
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<sup>157</sup> 2019 Refinement to the 2006 IPCC Guidelines for National Greenhouse Gas Inventories : <https://www.ipcc-nggip.iges.or.jp/public/2019rf/>).

	<p>(a) the area is designated to be retained as wetland and may not be converted to other land use;                  (b) the area is classified as a protected area;                  (c) the area is the subject of any legal or contractual guarantee ensuring that it will remain a wetland.</p> <p>4.2. In accordance with the national law, the operator of the activity commits that future updates to the restoration plan, beyond the activity that is financed, will continue to seek the climate benefits as determined in point 2. Besides, the operator of the activity commits to compensate any reduction in the climate benefit determined in point 2 with an equivalent climate benefit resulting from the conduct of an activity that corresponds to one of the environmental protection and restoration activities defined in this Regulation.</p> <p>5. Audit</p> <p>Within two years after the beginning of the activity and every 10 years thereafter, the compliance of the activity with the substantial contribution to climate change mitigation criteria and with the DNSH criteria are verified by either of the following:</p> <p>(a) the relevant national competent authorities;                  (b) an independent third-party certifier, at the request of national authorities or the operator of the activity.</p> <p>In order to reduce costs, audits may be performed together with any forest certification, climate certification or other audit.</p> <p>The independent third-party certifier may not have any conflict of interest with the owner or the funder, and may not be involved in the development or operation of the activity.</p> <p>6. Group assessment</p> <p>The compliance with the criteria for substantial contribution to climate change mitigation and with DNSH criteria may be checked at the level of a group of holdings sufficiently homogeneous to evaluate the risk of the sustainability of the forest activity, provided that all those holdings have a durable relationship between them and participate in the activity and the group of those holdings remains the same for all subsequent audits.</p>		
	<p><b>DNSH Criteria</b></p>	<p><b>Alignment with DNSH Criteria</b></p>	

Climate change adaptation	Refer to the assessment set out in Appendix 3, Table 36		Aligned
Sustainable use and protection of water and marine resources	Refer to the assessment set out in Appendix 3, Table 37		Aligned
Transition to a circular economy	Peat extraction is minimised.	Generali has confirmed to Sustainalytics that it will abide by this requirement. Based on the above, Sustainalytics assessed this to be aligned with the EU Taxonomy criteria.	Aligned
Pollution prevention and control	<p>The use of pesticides is minimised and alternative approaches or techniques, which may include non-chemical alternatives to pesticides are favoured, in accordance with Directive 2009/128/EC, with exception of occasions where the use of pesticides is needed to control outbreaks of pests and diseases.</p> <p>The activity minimises the use of fertilisers and does not use manure. The activity complies with Regulation (EU) 2019/1009 or national rules on fertilisers or soil improvers for agricultural use.</p> <p>Well documented and verifiable measures are taken to avoid the use of active ingredients that are listed in Annex I, part A, of Regulation (EU) 2019/1021<sup>158</sup>, the Rotterdam Convention on the prior informed consent procedure for certain hazardous chemicals and pesticides in international trade, the Minamata Convention on Mercury, the Montreal Protocol on Substances that Deplete the Ozone Layer, and of active ingredients that are listed as classification Ia ('extremely hazardous') or Ib ('highly hazardous') in the WHO recommended Classification of Pesticides by Hazard<sup>159</sup>. The activity complies with the relevant national implementing law on active ingredients.</p> <p>Pollution of water and soil is prevented and cleaning up measures are undertaken when pollution occurs.</p>	Generali confirmed to Sustainalytics that it would comply with Directive 2009/128/EC, Regulation (EU) 2019/1009 and regulation 2019/1021 as they are transposed in national law in member states. Since the projects under this category are only within EU member states, Sustainalytics assessed this to be aligned with the EU Taxonomy criteria.	Aligned

<sup>158</sup> Which implements in the Union the Stockholm Convention on persistent organic pollutants (OJ L 209, 31.7.2006, p. 3).

<sup>159</sup> The WHO Recommended Classification of Pesticides by Hazard (version 2019), : <https://apps.who.int/iris/bitstream/handle/10665/332193/9789240005662-eng.pdf?ua=1>).

<p>Protection and restoration of biodiversity and ecosystems</p>	<p>In areas designated by the national competent authority for conservation or in habitats that are protected, the activity is in accordance with the conservation objectives for those areas.</p> <p>There is no conversion of habitats specifically sensitive to biodiversity loss or with high conservation value, or of areas set aside for the restoration of such habitats in accordance with national law.</p> <p>The plan referred to in point 1 (Restoration plan) of this Section includes provisions for maintaining and possibly enhancing biodiversity in accordance with national and local provisions, including the following:</p> <ul style="list-style-type: none"> <li>(a) ensuring the good conservation status of habitat and species, maintenance of typical habitat species;</li> <li>(b) excluding the use or release of invasive species.</li> </ul>	<p>Generali confirmed that this will be included in the restoration plan.</p> <p>Based on the above, Sustainalytics assessed this to be aligned with the EU Taxonomy criteria.</p>	<p>Aligned</p>
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<p><b>Table 29 Framework Activity assessed</b></p>		<p>Environmentally Sustainable Management of Living Natural Resources and Land Use</p>	
<p><b>EU Taxonomy Activity</b></p>		<p>1.1. Afforestation</p>	
<p><b>Associated NACE Code</b></p>		<p>A2</p>	
<p><b>EU Technical Screening Criteria</b></p>		<p><b>Alignment with Technical Screening Criteria</b></p>	
<p>Climate change mitigation</p>	<p>1. Afforestation plan and subsequent forest management plan or equivalent instrument</p> <p>1.1. The area on which the activity takes place is covered by an afforestation plan of a duration of at least five years, or the minimum period prescribed in national law, developed prior to the start of the activity and continuously updated, until this area matches the definition of forest as set out in national law or where not available, is in line with the FAO</p> <p>1.2. Preferably through the afforestation plan, or if information is missing, through any other document, detailed information is provided on the following points:</p> <ul style="list-style-type: none"> <li>(a) description of the area according to its gazetting in the land registry;</li> <li>(b) site preparation and its impacts on pre-existing carbon stocks, including soils and above-ground biomass, in order to protect land with high carbon stock;</li> <li>(c) management goals, including major constraints;</li> </ul>	<p>1. Generali confirmed this criterion. Generali confirmed this criterion and that projects under Environmentally Sustainable Management will be implemented only within EU until and if an equivalent system is defined.</p> <p>2. Generali confirmed this criterion.</p> <p>3. Generali will rely on national law for EU member states.</p> <p>4. Generali confirmed this criterion.</p> <p>5. Generali confirmed this criterion.</p> <p>Based on the above, Sustainalytics assessed this to be aligned with the EU Taxonomy criteria.</p>	<p>Aligned</p>

	<p>(d) general strategies and activities planned to reach the management goals, including expected operations over the whole forest cycle;</p> <p>(e) definition of the forest habitat context, including main existing and intended forest tree species, and their extent and distribution;</p> <p>(f) compartments, roads, rights of way and other public access, physical features including waterways, areas under legal and other restrictions;</p> <p>(g) measures deployed to establish and maintain the good condition of forest ecosystems;</p> <p>(h) consideration of societal issues (including preservation of landscape, consultation of stakeholders in accordance with the terms and conditions laid down in national law);</p> <p>(i) assessment of forest related risks, including forest fires, and pests and diseases outbreaks, with the aim of preventing, reducing and controlling the risks and measures deployed to ensure protection and adaptation against residual risks;</p> <p>(j) assessment of impact on food security;</p> <p>(k) all DNSH criteria relevant to afforestation</p> <p>1.3. When the area becomes a forest, the afforestation plan is followed by a subsequent forest management plan or an equivalent instrument, as set out in national law or, where national law does not define a forest management plan or equivalent instrument, as referred to in the FAO definition of 'forest area with long-term forest management plan'.<sup>160</sup></p> <p>The forest management plan or the equivalent instrument covers a period of 10 years or more and is continuously updated.</p> <p>1.4. Information is provided on the following points that are not already documented in the forest management plan or equivalent system:</p> <p>(a) management goals, including major constraints;<sup>161</sup></p> <p>(b) general strategies and activities planned to reach the management goals, including expected operations over the whole forest cycle;</p> <p>(c) definition of the forest habitat context, including main existing and intended forest tree species, and their extent and distribution;</p>		
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<sup>160</sup> Forest area that has a long-term (ten years or more) documented management plan, aiming at defined management goals, and which is periodically revised, FAO Global Resources Assessment 2020. Terms and definitions : <http://www.fao.org/3/I8661EN/i8661en.pdf>.

<sup>161</sup> Including an analysis of (i) long-term sustainability of the wood resource (ii) impacts/pressures on habitat conservation, diversity of associated habitats and condition of harvesting minimising soil impacts.

	<p>(d) definition of the area according to its gazetting in the land registry;</p> <p>(e) compartments, roads, rights of way and other public access, physical features including waterways, areas under legal and other restrictions;</p> <p>(f) measures deployed to maintain the good condition of forest ecosystems;</p> <p>(g) consideration of societal issues (including preservation of landscape, consultation of stakeholders in accordance with the terms and conditions laid down in national law);</p> <p>(h) assessment of forest related risks, including forest fires, and pests and diseases outbreaks, with the aim of preventing, reducing and controlling the risks and measures deployed to ensure protection and adaptation against residual risks;</p> <p>(i) all DNSH criteria relevant to forest management</p> <p>1.5. The activity follows the best afforestation practices laid down in national law, or, where no such best afforestation practices have been laid down in national law, the activity complies with one of the following criteria:</p> <p>(a) the activity complies with Commission Delegated Regulation (EU) No 807/2014;<sup>162</sup></p> <p>(b) the activity follows the "Pan-European Guidelines for Afforestation and Reforestation with a special focus on the provisions of the UNFCCC"<sup>163</sup></p> <p>1.6. The activity does not involve the degradation of land with high carbon stock<sup>164</sup></p> <p>1.7. The management system associated with the activity in place complies with the due diligence obligation and legality requirements laid down in Regulation (EU) No 995/2010 of the European Parliament and of the Council<sup>165</sup></p> <p>1.8. The afforestation plan and the subsequent forest management plan or equivalent instrument provide for monitoring that ensures the correctness of the information contained in the plan, in particular as regards the data relating to the involved area</p>		
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<sup>162</sup> Commission Delegated Regulation (EU) No 807/2014 of 11 March 2014 supplementing Regulation (EU) No 1305/2013 of the European Parliament and of the Council on support for rural development by the European Agricultural Fund for Rural Development (EAFRD) and introducing transitional provisions (OJ L 227, 31.7.2014, p. 1)

<sup>163</sup> Forest Europe Pan-European Guidelines for Afforestation and Reforestation with a special focus on the provisions of the UNFCCC adopted by the MCPFE Expert Level Meeting on 12-13 November, 2008 and by the PEBLDS Bureau on behalf of the PEBLDS Council on 4 November, 2008 : [https://www.foresteuropa.org/docs/other\\_meetings/2008/Geneva/Guidelines\\_Aff\\_Ref\\_ADOPTED.pdf](https://www.foresteuropa.org/docs/other_meetings/2008/Geneva/Guidelines_Aff_Ref_ADOPTED.pdf)

<sup>164</sup> Land with high-carbon stock means wetlands, including peatland, and continuously forested areas within the meaning of Article 29(4)(a), (b) and (c) of Directive (EU) 2018/2001

<sup>165</sup> Regulation (EU) No 995/2010 of the European Parliament and of the Council of 20 October 2010 laying down the obligations of operators who place timber and timber products on the market (OJ L 295, 12.11.2010, p. 23)

	<p>2. Climate benefit analysis</p> <p>2.1. For areas that comply with the requirements at forest sourcing area level to ensure that carbon stocks and sinks levels in the forest are maintained or strengthened over the long term in accordance with Article 29(7), point (b), of Directive (EU) 2018/2001 the activity complies with the following criteria:</p> <ul style="list-style-type: none"> <li>(a) the climate benefit analysis demonstrates that the net balance of GHG emissions and removals generated by the activity over a period of 30 years after the beginning of the activity is lower than a baseline, corresponding to the balance of GHG emissions and removals over a period of 30 years starting at the beginning of the activity, associated to the business-as-usual practices that would have occurred on the involved area in the absence of the activity;</li> <li>(b) long-term climate benefits are considered demonstrated by proof of alignment with Article 29(7), point (b), of Directive (EU) 2018/2001</li> </ul> <p>2.2. For areas that do not comply with the requirements at forest sourcing area level to ensure that carbon stocks and sinks levels in the forest are maintained or strengthened over the long term in accordance with Article 29(7), point (b), of Directive (EU) 2018/2001 the activity complies with the following criteria:</p> <ul style="list-style-type: none"> <li>(a) the climate benefit analysis demonstrates that the net balance of GHG emissions and removals generated by the activity over a period of 30 years after the beginning of the activity is lower than a baseline, corresponding to the balance of GHG emissions and removals over a period of 30 years starting at the beginning of the activity, associated to the business-as-usual practices that would have occurred on the involved area in the absence of the activity.</li> <li>(b) the projected long-term average net GHG balance of the activity is lower than the long-term average GHG balance projected for the baseline, referred to in point 2.2, where long term corresponds to the longer duration between 100 years and the duration of an entire forest cycle.</li> </ul> <p>2.3. The calculation of climate benefit complies with all of the following criteria:</p> <ul style="list-style-type: none"> <li>(a) the analysis is consistent with the 2019 Refinement to the 2006 IPCC Guidelines for National Greenhouse Gas</li> </ul>		
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	<p>Inventories.<sup>166</sup> The climate benefit analysis is based on transparent, accurate, consistent, complete and comparable information, covers all carbon pools impacted by the activity, including above-ground biomass, belowground biomass, deadwood, litter and soil, relies on the most conservative assumptions for calculations and includes appropriate considerations about the risks of non-permanence and reversals of carbon sequestration, the risk of saturation and the risk of leakage.</p> <p>(b) the business as-usual practices, including harvesting practices, are ones of the following:</p> <ul style="list-style-type: none"> <li>(i) the management practices as documented in the latest version of the forest management plan or equivalent instrument before the start of the activity, if any;</li> <li>(ii) the most recent business-as-usual practices prior to the start of the activity;</li> <li>(iii) the practices corresponding to a management system ensuring that carbon stocks and sinks levels in the forest area are maintained or strengthened over the long term as set out in Article 29(7), point (b), of Directive (EU) 2018/2001.</li> </ul> <p>(c) the resolution of the analysis is proportionate to the size of the area concerned and values specific to the area concerned are used.</p> <p>(d) emissions and removals that occur due to natural disturbances, such as pests and diseases infestations, forest fires, wind, storm damages, that impact the area and cause underperformance do not result in non-compliance with Regulation (EU) 2020/852, provided that the climate benefit analysis is consistent with the 2019 Refinement to the 2006 IPCC Guidelines for National Greenhouse Gas Inventories regarding emissions and removals due to natural disturbances.</p> <p>2.4. Forest holdings under 13ha are not required to perform a climate benefit analysis.</p> <p>3. Guarantee of permanence</p> <p>3.1. In accordance with national law, the forest status of the area in which the activity takes place is guaranteed by one of the following measures:</p>		
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<sup>166</sup> 2019 Refinement to the 2006 IPCC Guidelines for National Greenhouse Gas Inventories : <https://www.ipcc-nggip.iges.or.jp/public/2019rf/>

	<p>(a) the area is classified in the permanent forest estate as defined by the FAO;<sup>167</sup></p> <p>(b) the area is classified as a protected area;</p> <p>(c) the area is the subject of any legal or contractual guarantee ensuring that it will remain a forest.</p> <p><b>4. Audit</b>                  Within two years after the beginning of the activity and every 10 years thereafter, the compliance of the activity with the substantial contribution to climate change mitigation criteria and the DNSH criteria are verified by either of the following:</p> <p>(a) the relevant national competent authorities;</p> <p>(b) an independent third-party certifier, at the request of national authorities or the operator of the activity.</p> <p>In order to reduce costs, audits may be performed together with any forest certification, climate certification or other audit.</p> <p>The independent third-party certifier may not have any conflict of interest with the owner or the funder, and may not be involved in the development or operation of the activity.</p> <p><b>5. Group assessment</b>                  The compliance with the criteria for substantial contribution to climate change mitigation and with DNSH criteria may be checked:</p> <p>(a) at the level of the forest sourcing area<sup>168</sup> as defined in Article 2, point (30), of Directive (EU) 2018/2001;</p> <p>(b) at the level of a group of holdings sufficiently homogeneous to evaluate the risk of the sustainability of the forest activity, provided that all those holdings have a durable relationship between them and participate in the activity and the group of those holdings remains the same for all subsequent audits.</p>		
<b>DNSH Criteria</b>		<b>Alignment with DNSH Criteria</b>	
Climate change adaptation	Refer to the assessment set out in Appendix 3, Table 36		Aligned
Sustainable use and protection of water	The activity complies with the criteria set out in Appendix B to the Annex I of the Climate Delegated Act	Refer to the assessment set out in Appendix 3, Table 37	Aligned

<sup>167</sup> Forest area that is designated to be retained as forest and may not be converted to other land use, FAO Global Resources Assessment 2020. Terms and definitions : <http://www.fao.org/3/I8661EN/i8661en.pdf>.

<sup>168</sup> 'Sourcing area' means the geographically defined area from which the forest biomass feedstock is sourced, from which reliable and independent information is available and where conditions are sufficiently homogeneous to evaluate the risk of the sustainability and legality characteristics of the forest biomass.

and marine resources	Detailed information referred to in point 1.2. (k) includes provisions to comply with the criteria set out in Appendix B to the Annex I of the Climate Delegated Act		
Pollution prevention and control	<p>The use of pesticides is reduced and alternative approaches or techniques, which may include non-chemical alternatives to pesticides, are favoured, in accordance with Directive 2009/128/EC of the European Parliament and of the Council<sup>169</sup>, with exception of occasions where the use of pesticides is needed to control outbreaks of pests and of diseases.</p> <p>The activity minimises the use of fertilisers and does not use manure. The activity complies with Regulation (EU) 2019/1009 of the European Parliament and of the Council<sup>170</sup> or national rules on fertilisers or soil improvers for agricultural use.</p> <p>Well documented and verifiable measures are taken to avoid the use of active ingredients that are listed in Annex I, part A, of Regulation (EU) 2019/1021<sup>171</sup> of the European Parliament and of the Council<sup>172</sup>, the Rotterdam Convention on the prior informed consent procedure for certain hazardous chemicals and pesticides in international trade<sup>173</sup>, the Minamata Convention on Mercury<sup>174</sup>, the Montreal Protocol on Substances that Deplete the Ozone Layer<sup>175</sup>, and of active ingredients that are listed as classification Ia ('extremely hazardous') or Ib ('highly hazardous') in the WHO Recommended Classification of Pesticides by Hazard<sup>176</sup>. The activity complies with the relevant national law on active ingredients.</p> <p>Pollution of water and soil is prevented and cleaning up measures are undertaken when pollution occurs.</p>	<p>Generali confirms that it will adhere to the requirements with EU as the EU directives and EU regulations will be transposed as national regulation within all EU members states.</p> <p>Based on the above, Sustainalytics considers this activity to be aligned.</p>	Aligned
Protection of biodiversity and ecosystems	In areas designated by the national competent authority for conservation or in habitats that are protected, the activity is in accordance with the conservation objectives for those areas.	<p>Generali confirms that it will abide by this requirement for all its projects implemented under the framework.</p> <p>Based on the above, Sustainalytics considers this activity to be aligned.</p>	Aligned

<sup>169</sup> Directive 2009/128/EC of the European Parliament and of the Council of 21 October 2009 establishing a framework for Community action to achieve the sustainable use of pesticides (OJ L 309, 24.11.2009, p. 71).

<sup>170</sup> Regulation (EU) 2019/1009 of the European Parliament and of the Council of 5 June 2019 laying down rules on the making available on the market of EU fertilising products and amending Regulations (EC) No 1069/2009 and (EC) No 1107/2009 and repealing Regulation (EC) No 2003/2003 (OJ L 170, 25.6.2019, p. 1).

<sup>171</sup> Which implements in the Union the Stockholm Convention on persistent organic pollutants (OJ L 209, 31.7.2006, p. 3.).

<sup>172</sup> Regulation (EU) 2019/1021 of the European Parliament and of the Council of 20 June 2019 on persistent organic pollutants (OJ L 169, 25.6.2019, p. 45).

<sup>173</sup> Rotterdam Convention on the Prior Informed Consent Procedure for Certain Hazardous Chemicals and Pesticides in International Trade (OJ L 63, 6.3.2003, p. 29).

<sup>174</sup> Minamata Convention on Mercury (OJ L 142, 2.6.2017, p. 6.).

<sup>175</sup> Montreal Protocol on Substances that Deplete the Ozone Layer (OJ L 297, 31.10.1988, p. 21).

<sup>176</sup> The WHO Recommended Classification of Pesticides by Hazard (version 2019), : <https://apps.who.int/iris/bitstream/handle/10665/332193/9789240005662-eng.pdf?ua=1>).

	<p>There is no conversion of habitats specifically sensitive to biodiversity loss or with high conservation value, or of areas set aside for the restoration of such habitats in accordance with national law.</p> <p>Detailed information referred to in points 1.2(k) (Afforestation plan) and 1.4(i) (Forest management plan or equivalent system) include provisions for maintaining and possibly enhancing biodiversity in accordance with national and local provisions, including the following:</p> <ul style="list-style-type: none"> <li>(a) ensuring the good conservation status of habitat and species, maintenance of typical habitat species;</li> <li>(b) excluding the use or release of invasive alien species;</li> <li>(c) excluding the use of non-native species unless it can be demonstrated that: <ul style="list-style-type: none"> <li>(i) the use of the forest reproductive material leads to favourable and appropriate ecosystem conditions (such as climate, soil criteria and vegetation zone, forest fire resilience);</li> <li>(ii) the native species currently present on the site are not anymore adapted to projected climatic and pedo-hydrological conditions.</li> </ul> </li> <li>(d) ensuring the maintenance and improvement of physical, chemical and biological quality of the soil;</li> <li>(e) promoting biodiversity-friendly practices that enhance forests' natural processes;</li> <li>(f) excluding the conversion of high-biodiverse ecosystems into less biodiverse ones;</li> <li>(g) ensuring the diversity of associated habitats and species linked to the forest;</li> <li>(h) ensuring the diversity of stand structures and maintenance or enhancing of mature stage stands and dead wood.</li> </ul>		
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<b>Table 30 Framework Activity assessed</b>		Environmentally Sustainable Management of Living Natural Resources and Land Use	
<b>EU Taxonomy Activity</b>		1.2. Rehabilitation and restoration of forests, including reforestation and natural forest regeneration after an extreme event	
<b>Associated NACE Code</b>		A2	
<b>EU Technical Screening Criteria</b>		<b>Alignment with Technical Screening Criteria</b>	
Climate change	<p>1. Forest management plan or equivalent instrument</p> <p>1.1. The activity takes place on area that is subject to a forest management plan or an equivalent instrument, as set out in national law</p>	Generali confirmed these criteria.	Aligned

<p>mitigation</p>	<p>or, where national law does not define a forest management plan or equivalent instrument, as referred to in the FAO definition of ‘forest area with long-term forest management plan’<sup>177</sup>. The forest management plan or the equivalent instrument covers a period of 10 years or more, and is continuously updated.</p> <p>1.2. Information is provided on the following points that are not already documented in the forest management plan or equivalent system:</p> <ul style="list-style-type: none"> <li>(a) management goals, including major constraints<sup>178</sup>;</li> <li>(b) general strategies and activities planned to reach the management goals, including expected operations over the whole forest cycle;</li> <li>(c) definition of the forest habitat context, including main existing and intended forest tree species, and their extent and distribution;</li> <li>(d) definition of the area according to its gazetting in the land registry;</li> <li>(e) compartments, roads, rights of way and other public access, physical features including waterways, areas under legal and other restrictions;</li> <li>(f) measures deployed to maintain the good condition of forest ecosystems;</li> <li>(g) consideration of societal issues (including preservation of landscape, consultation of stakeholders in accordance with the terms and conditions laid down in national law);</li> <li>(h) assessment of forest related risks, including forest fires, and pests and diseases outbreaks, with the aim of preventing, reducing and controlling the risks and measures deployed to ensure protection and adaptation against residual risks;</li> <li>(i) all DNSH criteria relevant to forest management.</li> </ul> <p>1.3. The sustainability of the forest management systems, as documented in the plan referred to in point 1.1, is ensured by choosing the most ambitious of the following approaches:</p> <ul style="list-style-type: none"> <li>(a) the forest management matches the applicable national definition of sustainable forest management;</li> <li>(b) the forest management matches the Forest Europe definition<sup>179</sup> of sustainable forest management, and complies</li> </ul>	<p>Based on the above, Sustainalytics assessed this to be aligned with the EU Taxonomy criteria.</p>	
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<sup>177</sup> Forest area that has a long-term (ten years or more) documented management plan, aiming at defined management goals, and which is periodically revised. FAO Global Resources Assessment 2020. Terms and definitions (: <http://www.fao.org/3/i8661en/i8661en.pdf>).

<sup>178</sup> Including an analysis of (i) long term sustainability of the wood resource (ii) impacts/pressures on habitat conservation, diversity of associated habitats and condition of harvesting minimizing soil impacts.

<sup>179</sup> The stewardship and use of forests and forest lands in a way, and at a rate, that maintains their biodiversity, productivity, regeneration capacity, vitality and their potential to fulfil, now and in the future, relevant ecological, economic and social functions, at local, national, and global levels, and that does not cause damage to other ecosystems.

Resolution H1 General Guidelines for the Sustainable Management of Forests in Europe Second Ministerial Conference on the Protection of Forests in Europe (Forest Europe), 16-17 June 1993, Helsinki/Finland : [https://www.foresteuropa.org/docs/MC/MC\\_helsinki\\_resolutionH1.pdf](https://www.foresteuropa.org/docs/MC/MC_helsinki_resolutionH1.pdf)).

	<p>with the Pan-European Operational Level Guidelines for Sustainable Forest Management<sup>180</sup>;</p> <p>(c) the management system in place complies with the forest sustainability criteria laid down in Article 29(6) of Directive (EU) 2018/2001, and as of the date of its application with the implementing act on operational guidance for energy from forest biomass adopted under Article 29(8) of that Directive.</p> <p>1.4. The activity does not involve the degradation of land with high carbon stock<sup>181</sup>.</p> <p>1.5. The management system associated with the activity in place complies with the due diligence obligation and legality requirements laid down in Regulation (EU) No 995/2010.</p> <p>1.6. The forest management plan or equivalent instrument provides for monitoring which ensures the correctness of the information contained in the plan, in particular as regards the data relating to the involved area.</p> <p>2. Climate benefit analysis</p> <p>2.1. For areas that comply with the requirements at forest sourcing area level to ensure that carbon stocks and sinks levels in the forest are maintained or strengthened over the long term in accordance with Article 29(7), point (b), of Directive (EU) 2018/2001 the activity complies with the following criteria:</p> <ul style="list-style-type: none"> <li>(a) the climate benefit analysis demonstrates that the net balance of GHG emissions and removals generated by the activity over a period of 30 years after the beginning of the activity is lower than a baseline, corresponding to the balance of GHG emissions and removals over a period of 30 years starting at the beginning of the activity, associated to the business-as-usual practices that would have occurred on the involved area in the absence of the activity;</li> <li>(b) long-term climate benefits are considered demonstrated by proof of alignment with Article 29(7), point (b), of Directive (EU) 2018/2001.</li> </ul> <p>2.2. For areas that do not comply with the requirements at forest sourcing area level to ensure that carbon stocks and sinks levels in the forest are maintained or strengthened over the long term in accordance with Article 29(7), point (b), of Directive (EU) 2018/2001 the activity complies with the following criteria:</p>		
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<sup>180</sup> Annex 2 of the Resolution L2. Pan-European Operational Level Guidelines for Sustainable Forest Management. Third Ministerial Conference on the Protection of Forests in Europe 2-4 June 1998, Lisbon/Portugal : [https://foresteurope.org/wp-content/uploads/2016/10/MC\\_lisbon\\_resolutionL2\\_with\\_annexes.pdf#page=18](https://foresteurope.org/wp-content/uploads/2016/10/MC_lisbon_resolutionL2_with_annexes.pdf#page=18)).

<sup>181</sup> Land with high-carbon stock means wetlands, including peatland, and continuously forested areas within the meaning of Article 29(4)(a), (b) and (c) of Directive (EU) 2018/2001.

	<p>(a) the climate benefit analysis demonstrates that the net balance of GHG emissions and removals generated by the activity over a period of 30 years after the beginning of the activity is lower than a baseline, corresponding to the balance of GHG emissions and removals over a period of 30 years starting at the beginning of the activity, associated to the business-as-usual practices that would have occurred on the involved area in the absence of the activity.</p> <p>(b) the projected long-term average net GHG balance of the activity is lower than the long-term average GHG balance projected for the baseline, referred to in point 2.2, where long term corresponds to the longer duration between 100 years and the duration of an entire forest cycle.</p> <p>2.3. The calculation of climate benefit complies with all of the following criteria:</p> <p>(a) the analysis is consistent with the 2019 Refinement to the 2006 IPCC Guidelines for National Greenhouse Gas Inventories<sup>182</sup>. The climate benefit analysis is based on transparent, accurate, consistent, complete and comparable information, covers all carbon pools impacted by the activity, including above-ground biomass, below-ground biomass, deadwood, litter and soil, relies on the most conservative assumptions for calculations and includes appropriate considerations about the risks of non-permanence and reversals of carbon sequestration, the risk of saturation and the risk of leakage.</p> <p>(b) the business-as-usual practices, including harvesting practices, are one of the following:</p> <ul style="list-style-type: none"> <li>(i) the management practices as documented in the latest version of the forest management plan or equivalent instrument before the start of the activity, if any;</li> <li>(ii) the most recent business-as-usual practices prior to the start of the activity;</li> <li>(iii) the practices corresponding to a management system ensuring that carbon stocks and sinks levels in the forest area are maintained or strengthened over the long term as set out in Article 29(7), point (b), of Directive (EU) 2018/2001.</li> </ul> <p>(c) the resolution of the analysis is proportionate to the size of the area concerned and values specific to the area concerned are used.</p>		
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<sup>182</sup>2019 Refinement to the 2006 IPCC Guidelines for National Greenhouse Gas Inventories (: <https://www.ipcc-nggip.iges.or.jp/public/2019rf/>).

	<p>(d) emissions and removals that occur due to natural disturbances, such as pests and diseases infestations, forest fires, wind, storm damages, that impact the area and cause underperformance do not result in non-compliance with Regulation (EU) 2020/852, provided that the climate benefit analysis is consistent with the 2019 Refinement to the 2006 IPCC Guidelines for National Greenhouse Gas Inventories regarding emissions and removals due to natural disturbances.</p> <p>2.4. Forest holdings under 13ha are not required to perform a climate benefit analysis.</p> <p>3. Guarantee of permanence</p> <p>3.1. In accordance with national law, the forest status of the area in which the activity takes place is guaranteed by one of the following measures:</p> <ul style="list-style-type: none"> <li>(a) the area is classified in the permanent forest estate as defined by the FAO<sup>183</sup>;</li> <li>(b) the area is classified as a protected area;</li> <li>(c) the area is the subject of any legal or contractual guarantee ensuring that it will remain a forest.</li> </ul> <p>3.2. In accordance with national law, the operator of the activity commits that future update to the forest management plan or equivalent instrument, beyond the activity that is financed, will continue to seek the climate benefits as determined in point 2. Besides, the operator of the activity commits to compensate any reduction in the climate benefit determined in point 2 with an equivalent climate benefit resulting from the conduct of an activity that corresponds to one of the forestry activities defined in this Regulation.</p> <p>4. Audit</p> <p>Within two years after the beginning of the activity and every 10 years thereafter, the compliance of the activity with the substantial contribution to climate change mitigation criteria and the DNSH criteria are verified by either of the following:</p> <ul style="list-style-type: none"> <li>(a) the relevant national competent authorities;</li> <li>(b) an independent third-party certifier, at the request of national authorities or the operator of the activity.</li> </ul> <p>In order to reduce costs, audits may be performed together with any forest certification, climate certification or other audit.</p>		
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<sup>183</sup>Forest area that is designated to be retained as forest and may not be converted to other land use, (FAO Global Resources Assessment 2020. Terms and definitions : <http://www.fao.org/3/i8661en/i8661en.pdf>).

	<p>The independent third-party certifier may not have any conflict of interest with the owner or the funder, and may not be involved in the development or operation of the activity.</p> <p>5. Group assessment</p> <p>The compliance with the criteria for substantial contribution to climate change mitigation and with DNSH criteria may be checked:</p> <p>(a) at the level of the forest sourcing area<sup>184</sup> as defined in Article 2, point (30), of Directive (EU) 2018/2001;</p> <p>(b) at the level of a group of holdings sufficiently homogeneous to evaluate the risk of the sustainability of the forest activity, provided that all those holdings have a durable relationship between them and participate in the activity and the group of those holdings remains the same for all subsequent audits.</p>		
<b>DNSH Criteria</b>		<b>Alignment with DNSH Criteria</b>	
Climate change adaptation	Refer to the assessment set out in Appendix 3, Table 36		Aligned
Sustainable use and protection of water and marine resources	Refer to the assessment set out in Appendix 3, Table 37		Aligned
Transition to a circular economy	The silvicultural change induced by the activity on the area covered by the activity is not likely to result in a significant reduction of sustainable supply of primary forest biomass suitable for the manufacturing of wood-based products with long-term circularity potential. This criterion may be demonstrated through the climate benefits analysis referred to in point (2).	<p>Generali confirmed that this will be included in the climate benefit analysis.</p> <p>Based on the above, Sustainalytics assessed this to be aligned with the EU Taxonomy criteria.</p>	Aligned
Pollution prevention and control	The use of pesticides is reduced and alternative approaches or techniques, which may include non-chemical alternatives to pesticides, are favoured, in accordance with Directive 2009/128/EC, with exception of occasions where the use of pesticides is needed to control outbreaks of pests and of diseases.	Generali confirmed that it will rely on Directive 2009/128/EC, Regulation (EU) 2019/1009 and regulation 2019/1021 transposed into national legislation. Additionally, compliance with other national legislation on pesticides will be ensured by the Generali's due diligence process.	Aligned

<sup>184</sup> 'Sourcing area' means the geographically defined area from which the forest biomass feedstock is sourced, from which reliable and independent information is available and where conditions are sufficiently homogeneous to evaluate the risk of the sustainability and legality characteristics of the forest biomass.

	<p>The activity minimises the use of fertilisers and does not use manure. The activity complies with Regulation (EU) 2019/1009 or national rules on fertilisers or soil improvers for agricultural use.</p> <p>Well documented and verifiable measures are taken to avoid the use of active ingredients that are listed in the Annex I, part A, of Regulation (EU) 2019/1021<sup>185</sup>, the Rotterdam Convention on the prior informed consent procedure for certain hazardous chemicals and pesticides in international trade, the Minamata Convention on Mercury, the Montreal Protocol on Substances that Deplete the Ozone Layer, and of active ingredients that are listed as classification Ia ('extremely hazardous') or Ib ('highly hazardous') in the WHO Recommended Classification of Pesticides by Hazard<sup>186</sup>. The activity complies with the relevant national law on active ingredients.</p> <p>Pollution of water and soil is prevented and cleaning up measures are undertaken when pollution occurs.</p>	<p>Based on the above, Sustainalytics assessed this to be aligned with the EU Taxonomy criteria.</p>	
<p>Protection and restoration of biodiversity and ecosystems</p>	<p>In areas designated by the national competent authority for conservation or in habitats that are protected, the activity is in accordance with the conservation objectives for those areas.</p> <p>There is no conversion of habitats specifically sensitive to biodiversity loss or with high conservation value, or of areas set aside for the restoration of such habitats in accordance with national law.</p> <p>Detailed information referred to in point 1.2.(i) includes provisions for maintaining and possibly enhancing biodiversity in accordance with national and local provisions, including the following:</p> <ul style="list-style-type: none"> <li>(a) ensuring the good conservation status of habitat and species, maintenance of typical habitat species;</li> <li>(b) excluding the use or release of invasive alien species;</li> <li>(c) excluding the use of non-native species unless it can be demonstrated that: <ul style="list-style-type: none"> <li>(i) the use of the forest reproductive material leads to favourable and appropriate ecosystem conditions (such as climate, soil criteria and vegetation zone, forest fire resilience);</li> </ul> </li> </ul>	<p>Generali confirms that it will abide by this requirement for all its projects implemented under the framework.</p> <p>Based on the above, Sustainalytics considers this activity to be aligned.</p>	<p>Aligned</p>

<sup>185</sup> Which implements in the Union the Stockholm Convention on persistent organic pollutants (OJ L 209, 31.7.2006, p. 3).

<sup>186</sup> The WHO Recommended Classification of Pesticides by Hazard (version 2019), : <https://apps.who.int/iris/bitstream/handle/10665/332193/9789240005662-eng.pdf?ua=1>.

	<p>(ii) the native species currently present on the site are not anymore adapted to projected climatic and pedo-hydrological conditions.</p> <p>(d) ensuring the maintenance and improvement of physical, chemical and biological quality of the soil;</p> <p>(e) promoting biodiversity-friendly practices that enhance forests' natural processes;</p> <p>(f) excluding the conversion of high-biodiverse ecosystems into less biodiverse ones;</p> <p>(g) ensuring the diversity of associated habitats and species linked to the forest;</p> <p>(h) ensuring the diversity of stand structures and maintenance or enhancing of mature stage stands and dead wood.</p>		
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<i>Table 31</i> Framework Activity assessed		Environmentally Sustainable Management of Living Natural Resources and Land Use	
EU Taxonomy Activity		1.3. Forest management	
Associated NACE Code		A2	
EU Technical Screening Criteria		Alignment with Technical Screening Criteria	
Mitigation	<p>1. Forest management plan or equivalent instrument</p> <p>1.1. The activity takes place on area that is subject to a forest management plan or an equivalent instrument, as set out in national law or, where national law does not define a forest management plan or equivalent instrument, as referred to in the FAO definition of 'forest area with long-term forest management plan'<sup>187</sup>.</p> <p>The forest management plan or equivalent instrument covers a period of 10 years or more and is continuously updated.</p> <p>1.2. Information is provided on the following points that are not already documented in the forest management plan or equivalent system:</p> <ul style="list-style-type: none"> <li>(a) management goals, including major constraints<sup>188</sup>;</li> <li>(b) general strategies and activities planned to reach the management goals, including expected operations over the whole forest cycle;</li> </ul>	<p>1. Generali confirmed this criterion and has the intention to obtain certification on this plan.</p> <p>2. Generali confirmed this criterion</p> <p>3. Generali confirmed this criterion</p> <p>4. Generali confirmed this criterion</p> <p>5. Generali confirmed this criterion</p> <p>Based on the above, Sustainalytics assessed this to be aligned with the EU Taxonomy criteria.</p>	Aligned

<sup>187</sup>Forest area that has a long-term (ten years or more) documented management plan, aiming at defined management goals, and which is periodically revised. FAO Global Resources Assessment 2020. Terms and definitions : <http://www.fao.org/3/i8661en/i8661en.pdf>.

<sup>188</sup> Which implements in the Union the Stockholm Convention on persistent organic pollutants (OJ L 209, 31.7.2006, p. 3).

	<p>(c) definition of the forest habitat context, including main existing and intended forest tree species, and their extent and distribution;</p> <p>(d) definition of the area according to its gazetting in the land registry;</p> <p>(e) compartments, roads, rights of way and other public access, physical features including waterways, areas under legal and other restrictions;</p> <p>(f) measures deployed to maintain the good condition of forest ecosystems;</p> <p>(g) consideration of societal issues (including preservation of landscape, consultation of stakeholders in accordance with the terms and conditions laid down in national law);</p> <p>(h) assessment of forest related risks, including forest fires, and pests and diseases outbreaks, with the aim of preventing, reducing and controlling the risks and measures deployed to ensure protection and adaptation against residual risks;</p> <p>(i) all DNSH criteria relevant for forest management.</p> <p>1.3. The sustainability of the forest management systems, as documented in the plan referred to in point 1.1, is ensured by choosing the most ambitious of the following approaches:</p> <p>(a) the forest management matches the applicable national definition of sustainable forest management;</p> <p>(b) the forest management matches the Forest Europe definition<sup>189</sup> of sustainable forest management, and complies with the Pan-European Operational Level Guidelines for Sustainable Forest Management<sup>190</sup>;</p> <p>(c) the management system in place shows compliance with the forest sustainability criteria set out in Article 29(6) of Directive (EU) 2018/2001, and as of the date of its application with the implementing act on operational guidance for energy from forest biomass adopted under Article 29(8) of that Directive.</p>		
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<sup>189</sup> The stewardship and use of forests and forest lands in a way, and at a rate, that maintains their biodiversity, productivity, regeneration capacity, vitality and their potential to fulfil, now and in the future, relevant ecological, economic and social functions, at local, national, and global levels, and that does not cause damage to other ecosystems.

Resolution H1 General Guidelines for the Sustainable Management of Forests in Europe Second Ministerial Conference on the Protection of Forests in Europe (Forest Europe), 16-17 June 1993, Helsinki/Finland : [https://www.foresteuropa.org/docs/MC/MC\\_helsinki\\_resolutionH1.pdf](https://www.foresteuropa.org/docs/MC/MC_helsinki_resolutionH1.pdf).

<sup>190</sup> Annex 2 of the Resolution L2. Pan-European Operational Level Guidelines for Sustainable Forest Management. Third Ministerial Conference on the Protection of Forests in Europe 2-4 June 1998, Lisbon/Portugal : [https://foresteuropa.org/wp-content/uploads/2016/10/MC\\_lisbon\\_resolutionL2\\_with\\_annexes.pdf#page=18](https://foresteuropa.org/wp-content/uploads/2016/10/MC_lisbon_resolutionL2_with_annexes.pdf#page=18)).

<p>1.4. The activity does not involve the degradation of land with high carbon stock<sup>191</sup>.</p> <p>1.5. The management system associated with the activity in place complies with the due diligence obligation and legality requirements laid down in Regulation (EU) No 995/2010.</p> <p>1.6. The forest management plan or equivalent instrument provides for monitoring which ensures the correctness of the information contained in the plan, in particular as regards the data relating to the involved area.</p> <p>2. Climate benefit analysis</p> <p>2.1. For areas that comply with the requirements at forest sourcing area level to ensure that carbon stocks and sinks levels in the forest are maintained or strengthened over the long term in accordance with Article 29(7), point (b), of Directive (EU) 2018/2001 the activity complies with the following criteria:</p> <ul style="list-style-type: none"> <li>(a) the climate benefit analysis demonstrates that the net balance of GHG emissions and removals generated by the activity over a period of 30 years after the beginning of the activity is lower than a baseline, corresponding to the balance of GHG emissions and removals over a period of 30 years starting at the beginning of the activity, associated to the business-as-usual practices that would have occurred on the involved area in the absence of the activity;</li> <li>(b) long-term climate benefits are considered demonstrated by proof of alignment with Article 29(7), point (b), of Directive (EU) 2018/2001.</li> </ul> <p>2.2. For areas that do not comply with the requirements at forest sourcing area level to ensure that carbon stocks and sinks levels in the forest are maintained or strengthened over the long term in accordance with Article 29(7), point (b), of Directive (EU) 2018/2001 the activity complies with the following criteria:</p> <ul style="list-style-type: none"> <li>(a) the climate benefit analysis demonstrates that the net balance of GHG emissions and removals generated by the activity over a period of 30 years after the beginning of the activity is lower than a baseline, corresponding to the balance of GHG emissions and removals over a period of 30 years starting at the beginning of the activity, associated to the business-as-usual practices that would have occurred on the involved area in the absence of the activity.</li> </ul>		
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<sup>191</sup> Land with high-carbon stock means wetlands, including peatland, and continuously forested areas within the meaning of Article 29(4)(a), (b) and (c) of Directive (EU) 2018/2001.

	<p>(b) the projected long-term average net GHG balance of the activity is lower than the long-term average GHG balance projected for the baseline, referred to in point 2.2, where long term corresponds to the longer duration between 100 years and the duration of an entire forest cycle.</p> <p>2.3. The calculation of climate benefit complies with all of the following criteria:</p> <p>(a) the analysis is consistent with the 2019 Refinement to the 2006 IPCC Guidelines for National Greenhouse Gas Inventories<sup>192</sup>. The climate benefit analysis is based on transparent, accurate, consistent, complete and comparable information, covers all carbon pools impacted by the activity, including above-ground biomass, below-ground biomass, deadwood, litter and soil, relies on the most conservative assumptions for calculations and includes appropriate considerations about the risks of non-permanence and reversals of carbon sequestration, the risk of saturation and the risk of leakage.</p> <p>(b) the business-as-usual practices, including harvesting practices, are one of the following:</p> <ul style="list-style-type: none"> <li>(i) the management practices as documented in the latest version of the forest management plan or equivalent instrument before the start of the activity, if any;</li> <li>(ii) the most recent business-as-usual practices prior to the start of the activity;</li> <li>(iii) the practices corresponding to a management system ensuring that carbon stocks and sinks levels in the forest area are maintained or strengthened over the long term as set out in Article 29(7), point (b), of Directive (EU) 2018/2001.</li> </ul> <p>(c) the resolution of the analysis is proportionate to the size of the area concerned and values specific to the area concerned are used.</p> <p>(d) emissions and removals that occur due to natural disturbances, such as pests and diseases infestations, forest fires, wind, storm damages, that impact the area and cause underperformance do not result in non-compliance with Regulation (EU) 2020/852, provided that the climate benefit analysis is consistent with the 2019 Refinement to the 2006 IPCC Guidelines for National Greenhouse Gas Inventories regarding emissions and removals due to natural disturbances.</p>		
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<sup>192</sup> 2019 Refinement to the 2006 IPCC Guidelines for National Greenhouse Gas Inventories : <https://www.ipcc-nggip.iges.or.jp/public/2019rf/>).

<p>2.4. Forest holdings under 13ha are not required to perform a climate benefit analysis.</p> <p>3. Guarantee of permanence</p> <p>3.1. In accordance with national law, the forest status of the area in which the activity takes place is guaranteed by one of the following measures:</p> <ul style="list-style-type: none"> <li>(a) the area is classified in the permanent forest estate as defined by the FAO<sup>193</sup>;</li> <li>(b) the area is classified as a protected area;</li> <li>(c) the area is the subject of any legal or contractual guarantee ensuring that it will remain a forest.</li> </ul> <p>3.2. In accordance with national law, the operator of the activity commits that future updates to the forest management plan or equivalent instrument, beyond the activity that is financed, will continue to seek the climate benefits as determined in point 2. Besides, the operator of the activity commits to compensate any reduction in the climate benefit determined in point 2 with an equivalent climate benefit resulting from the conduct of an activity that corresponds to one of the forestry activities defined in this Regulation.</p> <p>4. Audit</p> <p>Within two years after the beginning of the activity and every 10 years thereafter, the compliance of the activity the substantial contribution to climate change mitigation criteria and the DNSH criteria is verified by either of the following:</p> <ul style="list-style-type: none"> <li>(a) the relevant national competent authorities;</li> <li>(b) an independent third-party certifier, at the request of national authorities or the operator of the activity.</li> </ul> <p>In order to reduce costs, audits may be performed together with any forest certification, climate certification or other audit.</p> <p>The independent third-party certifier may not have any conflict of interest with the owner or the funder, and may not be involved in the development or operation of the activity.</p> <p>5. Group assessment</p> <p>The compliance with the criteria for substantial contribution to climate change mitigation and with DNSH criteria may be checked:</p>	
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<sup>193</sup> Forest area that is designated to be retained as forest and may not be converted to other land use. (FAO Global Resources Assessment 2020. Terms and definitions : <http://www.fao.org/3/I8661EN/i8661en.pdf>).

	(a) at the level of the forest sourcing area <sup>194</sup> as defined in Article 2, point (30), of Directive (EU) 2018/2001; (b) at the level of a group of holdings sufficiently homogeneous to evaluate the risk of the sustainability of the forest activity, provided that all those holdings have a durable relationship between them and participate in the activity and the group of those holdings remains the same for all subsequent audits.		
	<b>DNSH Criteria</b>	<b>Alignment with DNSH Criteria</b>	
Climate change adaptation	Refer to the assessment set out in Appendix 3, Table 36		Aligned
Sustainable use and protection of water and marine resources	Refer to the assessment set out in Appendix 3, Table 37		Aligned
Transition to a circular economy	The silvicultural change induced by the activity on the area covered by the activity is not likely to result in a significant reduction of sustainable supply of primary forest biomass suitable for the manufacturing of wood-based products with long-term circularity potential. This criterion may be demonstrated through the climate benefits analysis referred to in point (2).	Generali confirmed to Sustainalytics that this will be demonstrated through the climate benefit analysis.  Based on the above, Sustainalytics assessed this to be aligned with the EU Taxonomy criteria.	Aligned
Pollution prevention and control	The use of pesticides is reduced and alternative approaches or techniques, which may include non-chemical alternatives to pesticides, are favoured, in accordance with Directive 2009/128/EC, with exception of occasions where the use of pesticides is needed to control outbreaks of pests and of diseases.  The activity minimises the use of fertilisers and does not use manure. The activity complies with Regulation (EU) 2019/1009 or national rules on fertilisers or soil improvers for agricultural use.  Well documented and verifiable measures are taken to avoid the use of active ingredients that are listed in the Annex I, part A, of Regulation (EU) 2019/1021 <sup>195</sup> , the Rotterdam Convention on the prior informed consent	Generali confirms that it will adhere to the requirements with EU as the EU directives and EU regulations will be transposed as national regulation within all EU members states.  Based on the above, Sustainalytics considers this activity to be aligned.	Aligned

<sup>194</sup> 'Sourcing area' means the geographically defined area from which the forest biomass feedstock is sourced, from which reliable and independent information is available and where conditions are sufficiently homogeneous to evaluate the risk of the sustainability and legality characteristics of the forest biomass.

<sup>195</sup> Which implements in the Union the Stockholm Convention on persistent organic pollutants (OJ L 209, 31.7.2006, p. 3).

	<p>procedure for certain hazardous chemicals and pesticides in international trade, the Minamata Convention on Mercury, the Montreal Protocol on Substances that Deplete the Ozone Layer, and of active ingredients that are listed as classification Ia ('extremely hazardous') or Ib ('highly hazardous') in the WHO Recommended Classification of Pesticides by Hazard<sup>196</sup>. The activity complies with the relevant national law on active ingredients.</p> <p>Pollution of water and soil is prevented and cleaning up measures are undertaken when pollution occurs.</p>		
<p>Protection and restoration of biodiversity and ecosystems</p>	<p>In areas designated by the national competent authority for conservation or in habitats that are protected, the activity is in accordance with the conservation objectives for those areas.</p> <p>There is no conversion of habitats specifically sensitive to biodiversity loss or with high conservation value, or of areas set aside for the restoration of such habitats in accordance with national law. Detailed information referred to in point 1.2.(i) includes provisions for maintaining and possibly enhancing biodiversity in accordance with national and local provisions, including the following:</p> <ul style="list-style-type: none"> <li>(a) ensuring the good conservation status of habitat and species, maintenance of typical habitat species;</li> <li>(b) excluding the use or release of invasive alien species;</li> <li>(c) excluding the use of non-native species unless it can be demonstrated that: <ul style="list-style-type: none"> <li>(i) the use of the forest reproductive material leads to favourable and appropriate ecosystem conditions (such as climate, soil criteria and vegetation zone, forest fire resilience);</li> <li>(ii) the native species currently present on the site are not anymore adapted to projected climatic and pedo-hydrological conditions.</li> </ul> </li> <li>(d) ensuring the maintenance and improvement of physical, chemical and biological quality of the soil;</li> <li>(e) promoting biodiversity-friendly practices that enhance forests' natural processes;</li> <li>(f) excluding the conversion of high-biodiverse ecosystems into less biodiverse ones;</li> <li>(g) ensuring the diversity of associated habitats and species linked to the forest;</li> </ul>	<p>Generali confirms that it will abide by this requirement for all its projects implemented under the framework.</p> <p>Based on the above, Sustainalytics considers this activity to be aligned.</p>	<p>Aligned</p>

<sup>196</sup> The WHO Recommended Classification of Pesticides by Hazard (version 2019), (: <https://apps.who.int/iris/bitstream/handle/10665/332193/9789240005662-eng.pdf?ua=1>).

	(h) ensuring the diversity of stand structures and maintenance or enhancing of mature stage stands and dead wood.		
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Table 32

<b>Framework Activity assessed</b>		Environmentally Sustainable Management of Living Natural Resources and Land Use	
<b>EU Taxonomy Activity</b>		1.4. Conservation forestry	
<b>Associated NACE Code</b>		A2	
<b>EU Technical Screening Criteria</b>		<b>Alignment with Technical Screening Criteria</b>	
Mitigation	<p>1. Forest management plan or equivalent instrument</p> <p>1.1. The activity takes place on area that is subject to a forest management plan or an equivalent instrument, as set out in national law or, where national law does not define a forest management plan or equivalent instrument, as referred to in the FAO definition of 'forest area with long-term forest management plan'<sup>197</sup>.</p> <p>The forest management plan or equivalent instrument covers a period of 10 years or more and is continuously updated.</p> <p>1.2. Information is provided on the following points that are not already documented in the forest management plan or equivalent system:</p> <ul style="list-style-type: none"> <li>(a) management goals, including major constraints;</li> <li>(b) general strategies and activities planned to reach the management goals, including expected operations over the whole forest cycle;</li> <li>(c) definition of the forest habitat context, main forest tree species and those intended and their extent and distribution, in accordance to the local forest ecosystem context;</li> <li>(d) definition of the area according to its gazetting in the land registry;</li> <li>(e) compartments, roads, rights of way and other public access, physical features including waterways, areas under legal and other restrictions;</li> </ul>	<p>1. Generali confirmed this criterion and has the intention to obtain certification on this plan.</p> <p>2. Generali confirmed this criterion</p> <p>3. Generali confirmed this criterion</p> <p>4. Generali confirmed this criterion</p> <p>5. Generali confirmed this criterion</p> <p>Based on the above, Sustainalytics assessed this to be aligned with the EU Taxonomy criteria.</p>	Aligned

<sup>197</sup>Forest area that has a long-term (ten years or more) documented management plan, aiming at defined management goals, and which is periodically revised. FAO Global Resources Assessment 2020. Terms and definitions (: <http://www.fao.org/3/I8661EN/i8661en.pdf>).

	<p>(f) measures deployed to maintain the good condition of forest ecosystems;</p> <p>(g) consideration of societal issues (including preservation of landscape, consultation of stakeholders in accordance with the terms and conditions laid down in national law);</p> <p>(h) assessment of forest related risks, including forest fires, and pests and diseases outbreaks, with the aim of preventing, reducing and controlling the risks and measures deployed to ensure protection and adaptation against residual risks;</p> <p>(i) all DNSH relevant to forest management.</p> <p>1.3. The forest management plan or the equivalent instrument: shows a primary designated management objective<sup>198</sup> that consists in protection of soil and water<sup>199</sup>, conservation of biodiversity<sup>200</sup> or social services<sup>201</sup> based on the FAO definitions;</p> <p>(b) promotes biodiversity-friendly practices that enhance forests' natural processes;</p> <p>(c) includes an analysis of:</p> <p>(i) impacts and pressures on habitat conservation and diversity of associated habitats;</p> <p>(ii) condition of harvesting minimizing soil impacts;</p> <p>(iii) other activities that have an impact on conservation objectives, such as hunting and fishing, agricultural, pastoral and forestry activities, industrial, mining, and commercial activities.</p> <p>1.4. The sustainability of the forest management systems as documented in the plan referred to in point 1.1 is ensured by choosing the most ambitious of the following approaches:</p> <p>(a) the forest management matches the national definition of sustainable forest management, if any;</p> <p>(b) the forest management matches the Forest Europe definition<sup>202</sup> of sustainable forest management and complies</p>		
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<sup>198</sup>The primary designated management objective assigned to a management unit (FAO Global Resources Assessment 2020. Terms and definitions : <http://www.fao.org/3/I8661EN/i8661en.pdf>).

<sup>199</sup> Forest where the management objective is protection of soil and water. (FAO Global Resources Assessment 2020. Terms and definitions | <http://www.fao.org/3/I8661EN/i8661en.pdf>).

<sup>200</sup> Forest where the management objective is conservation of biological diversity. Includes but is not limited to areas designated for biodiversity conservation within the protected areas. (FAO Global Resources Assessment 2020. Terms and definitions : <http://www.fao.org/3/I8661EN/i8661en.pdf>).

<sup>201</sup> Forest where the management objective is social services. (FAO Global Resources Assessment 2020. Terms and definitions : <http://www.fao.org/3/I8661EN/i8661en.pdf>)

<sup>202</sup> The stewardship and use of forests and forest lands in a way, and at a rate, that maintains their biodiversity, productivity, regeneration capacity, vitality and their potential to fulfil, now and in the future, relevant ecological, economic and social functions, at local, national, and global levels, and that does not cause damage to other ecosystems.

Resolution H1 General Guidelines for the Sustainable Management of Forests in Europe Second Ministerial Conference on the Protection of Forests in Europe (Forest Europe), 16-17 June 1993, Helsinki/Finland : [https://www.foresteuropa.org/docs/MC/MC\\_helsinki\\_resolutionH1.pdf](https://www.foresteuropa.org/docs/MC/MC_helsinki_resolutionH1.pdf)

	<p>with the Pan-European Operational Level Guidelines for Sustainable Forest Management<sup>203</sup>;</p> <p>(c) the management system in place shows compliance with the forest sustainability criteria as defined in Article 29(6) of Directive (EU) 2018/2001, and as of the date of its application with the implementing act on operational guidance for energy from forest biomass adopted under Article 29(8) of that Directive.</p> <p>1.5 The activity does not involve the degradation of land with high carbon stock<sup>204</sup>.</p> <p>1.6. The management system associated with the activity in place complies with the due diligence obligation and legality requirements laid down in Regulation (EU) No 995/2010.</p> <p>1.7. The forest management plan or equivalent instrument provides for monitoring which ensures the correctness of the information contained in the plan, in particular as regards the data relating to the involved area.</p> <p>2. Climate benefit analysis</p> <p>2.1. For areas that comply with the requirements at forest sourcing area level to ensure that carbon stocks and sinks levels in the forest are maintained or strengthened over the long term in accordance with Article 29(7), point (b), of Directive (EU) 2018/2001 the activity complies with the following criteria:</p> <p>(a) the climate benefit analysis demonstrates that the net balance of GHG emissions and removals generated by the activity over a period of 30 years after the beginning of the activity is lower than a baseline, corresponding to the balance of GHG emissions and removals over a period of 30 years starting at the beginning of the activity, associated to the business-as-usual practices that would have occurred on the involved area in the absence of the activity;</p> <p>(b) long-term climate benefits are considered demonstrated by proof of alignment with Article 29(7), point (b), of Directive (EU) 2018/2001.</p> <p>2.2. For areas that do not comply with the requirements at forest sourcing area level to ensure that carbon stocks and sinks levels in the forest are maintained or strengthened over the long term in accordance with Article</p>		
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<sup>203</sup> Annex 2 of the Resolution L2. Pan-European Operational Level Guidelines for Sustainable Forest Management. Third Ministerial Conference on the Protection of Forests in Europe 2-4 June 1998, Lisbon/Portugal : [https://foresteurope.org/wp-content/uploads/2016/10/MC\\_lisbon\\_resolutionL2\\_with\\_annexes.pdf#page=18](https://foresteurope.org/wp-content/uploads/2016/10/MC_lisbon_resolutionL2_with_annexes.pdf#page=18)).

<sup>204</sup> Land with high-carbon stock means wetlands, including peatland, and continuously forested areas within the meaning of Article 29(4)(a), (b) and (c) of Directive (EU) 2018/2001.

	<p>29(7), point (b), of Directive (EU) 2018/2001 the activity complies with the following criteria:</p> <p>(a) the climate benefit analysis demonstrates that the net balance of GHG emissions and removals generated by the activity over a period of 30 years after the beginning of the activity is lower than a baseline, corresponding to the balance of GHG emissions and removals over a period of 30 years starting at the beginning of the activity, associated to the business-as-usual practices that would have occurred on the involved area in the absence of the activity.</p> <p>(b) the projected long-term average net GHG balance of the activity is lower than the long-term average GHG balance projected for the baseline, referred to in point 2.2, where long term corresponds to the longer duration between 100 years and the duration of an entire forest cycle.</p> <p>2.3. The calculation of climate benefit complies with all of the following criteria:</p> <p>(a) the analysis is consistent with the 2019 Refinement to the 2006 IPCC Guidelines for National Greenhouse Gas Inventories<sup>205</sup>. The climate benefit analysis is based on transparent, accurate, consistent, complete and comparable information, covers all carbon pools impacted by the activity, including above-ground biomass, below-ground biomass, deadwood, litter and soil, relies on the most conservative assumptions for calculations and includes appropriate considerations about the risks of non-permanence and reversals of carbon sequestration, the risk of saturation and the risk of leakage.</p> <p>(b) the business as-usual practices, including harvesting practices, are one of the following:</p> <p>(i) the management practices as documented in the latest version of the forest management plan or equivalent instrument before the start of the activity, if any;</p> <p>(ii) the most recent business-as-usual practices prior to the start of the activity;</p> <p>(iii) the practices corresponding to a management system ensuring that carbon stocks and sinks levels in the forest area are maintained or strengthened over the long term as set out in Article 29(7), point (b), of Directive (EU) 2018/2001.</p>		
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<sup>205</sup> 2019 Refinement to the 2006 IPCC Guidelines for National Greenhouse Gas Inventories (: <https://www.ipcc-nggip.iges.or.jp/public/2019rf/>).

	<p>(c) the resolution of the analysis is proportionate to the size of the area concerned and values specific to the area concerned are used.</p> <p>(d) emissions and removals that occur due to natural disturbances, such as pests and diseases infestations, forest fires, wind, storm damages, that impact the area and cause underperformance do not result in non-compliance with the criteria of Regulation (EU) 2020/852, provided that the climate benefit analysis is consistent with the 2019 Refinement to the 2006 IPCC Guidelines for National Greenhouse Gas Inventories regarding emissions and removals due to natural disturbances.</p> <p>2.4. Forest holdings under 13ha are not required to perform a climate benefit analysis.</p> <p>3. Guarantee of permanence</p> <p>3.1. In accordance with national law, the forest status of the area in which the activity takes place is guaranteed by one of the following measures:</p> <ul style="list-style-type: none"> <li>(a) the area is classified in the permanent forest estate as defined by the FAO<sup>206</sup> ;</li> <li>(b) the area is classified as a protected area;</li> <li>(c) the area is the subject of any legal or contractual guarantee ensuring that it will remain a forest.</li> </ul> <p>3.2. In accordance with national law, the operator of the activity commits that future updates to the forest management plan or equivalent instrument, beyond the activity that is financed, will continue to seek the climate benefits as determined in point 2. Besides, the operator of the activity commits to compensate any reduction in the climate benefit determined in point 2 with an equivalent climate benefit resulting from the conduct of an activity that corresponds to one of the forestry activities defined in this Regulation.</p> <p>4. Audit</p> <p>Within two years after the beginning of the activity and every 10 years thereafter, the compliance of the activity with the substantial contribution to climate change mitigation criteria and the DNSH criteria are verified by either of the following:</p> <ul style="list-style-type: none"> <li>(a) the relevant national competent authorities;</li> <li>(b) an independent third-party certifier, at the request of national authorities or the operator of the activity.</li> </ul>		
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<sup>206</sup> 60 Forest area that is designated to be retained as forest and may not be converted to other land use. (FAO Global Resources Assessment 2020. Terms and definitions : <http://www.fao.org/3/I8661EN/i8661en.pdf>).

	<p>In order to reduce costs, audits may be performed together with any forest certification, climate certification or other audit.</p> <p>The independent third-party certifier may not have any conflict of interest with the owner or the funder, and may not be involved in the development or operation of the activity.</p> <p>5. Group assessment</p> <p>The compliance with the criteria for substantial contribution to climate change mitigation and with DNSH criteria may be checked:</p> <ul style="list-style-type: none"> <li>(a) at the level of the forest sourcing area<sup>207</sup> as defined in Article 2, point (30), of Directive (EU) 2018/2001;</li> <li>(b) at the level of a group of forest holdings sufficiently homogeneous to evaluate the risk of the sustainability of the forest activity, provided that all those holdings have a durable relationship between them and participate in the activity and the group of those holdings remains the same for all subsequent audits.</li> </ul>		
<b>DNSH Criteria</b>		<b>Alignment with DNSH Criteria</b>	
Climate change adaptation	Refer to the assessment set out in Appendix 3, Table 36		Aligned
Sustainable use and protection of water and marine resources	Refer to the assessment set out in Appendix 3, Table 37		Aligned
Transition to a circular economy	The silvicultural change induced by the activity on the area covered by the activity is not likely to result in a significant reduction of sustainable supply of primary forest biomass suitable for the manufacturing of wood-based products with long-term circularity potential. This criterion may be demonstrated through the climate benefits analysis referred to in point (2).	<p>Generali confirmed to Sustainalytics that this will be demonstrated through the climate benefit analysis.</p> <p>Based on the above, Sustainalytics assessed this to be aligned with the EU Taxonomy criteria.</p>	Aligned

<sup>207</sup> 'Sourcing area' means the geographically defined area from which the forest biomass feedstock is sourced, from which reliable and independent information is available and where conditions are sufficiently homogeneous to evaluate the risk of the sustainability and legality characteristics of the forest biomass.

Pollution prevention and control	<p>The activity does not use pesticides or fertilisers.</p> <p>Well documented and verifiable measures are taken to avoid the use of active ingredients that are listed in Annex I, part A, of Regulation (EU) 2019/1021<sup>208</sup>, the Rotterdam Convention on the prior informed consent procedure for certain hazardous chemicals and pesticides in international trade, the Minamata Convention on Mercury, the Montreal Protocol on Substances that Deplete the Ozone Layer, and of active ingredients that are listed as classification Ia ('extremely hazardous') or Ib ('highly hazardous') in the WHO Recommended Classification of Pesticides by Hazard<sup>209</sup>. The activity complies with the relevant national law on active ingredients.</p> <p>Pollution of water and soil is prevented and cleaning up measures are undertaken when pollution occurs.</p>	<p>Generali confirms that it will adhere to requirement of not using pesticides and fertilisers. Further, Generali will adhere to the requirements with EU as the EU directives and EU regulations will be transposed as national regulation within all EU members states. Based on the above, Sustainalytics considers this activity to be aligned.</p>	Aligned
Protection and restoration of biodiversity and ecosystems	<p>In areas designated by the national competent authority for conservation or in habitats that are protected, the activity is in accordance with the conservation objectives for those areas.</p> <p>There is no conversion of habitats specifically sensitive to biodiversity loss or with high conservation value, or of areas set aside for the restoration of such habitats in accordance with national law.</p> <p>Detailed information referred to in in point 1.2.(i) includes provisions for maintaining and possibly enhancing biodiversity in accordance with national and local provisions, including the following:</p> <ul style="list-style-type: none"> <li>(a) ensuring the good conservation status of habitat and species, maintenance of typical habitat species;</li> <li>(b) excluding the use or release of invasive alien species;</li> <li>(c) excluding the use of non-native species unless it can be demonstrated that: <ul style="list-style-type: none"> <li>(i) the use of the forest reproductive material leads to favourable and appropriate ecosystem conditions (such as climate, soil criteria, and vegetation zone, forest fire resilience);</li> <li>(ii) the native species currently present on the site are not anymore adapted to projected climatic and pedo-hydrological conditions;</li> </ul> </li> <li>(d) ensuring the maintenance and improvement of physical, chemical and biological quality of the soil;</li> </ul>	<p>Generali confirms that it will abide by this requirement for all its projects implemented under the framework.</p> <p>Based on the above, Sustainalytics considers this activity to be aligned.</p>	Aligned

<sup>208</sup> Which implements in the Union the Stockholm Convention on persistent organic pollutants (OJ L 209, 31.7.2006, p. 3.).

<sup>209</sup> The WHO Recommended Classification of Pesticides by Hazard (version 2019), (: <https://apps.who.int/iris/bitstream/handle/10665/332193/9789240005662-eng.pdf?ua=1>).

	<p>(e) promoting biodiversity-friendly practices that enhance forests' natural processes;</p> <p>(f) excluding the conversion of high-biodiverse ecosystems into less biodiverse ones;</p> <p>(g) ensuring the diversity of associated habitats and species linked to the forest;</p> <p>(h) ensuring the diversity of stand structures and maintenance or enhancing of mature stage stands and dead wood.</p>		
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Table 33

<b>Framework Activity assessed</b>		Green Buildings	
<b>EU Taxonomy Activity</b>		7.1. Construction of new buildings	
<b>Associated NACE Codes</b>		F41.1, F41.2 and F43	
<b>EU Technical Screening Criteria</b>		<b>Alignment with Technical Screening Criteria</b>	
Adaptation	<p>Constructions of new buildings for which:</p> <p>1. The economic activity has implemented physical and non-physical solutions ('adaptation solutions') that substantially reduce the most important physical climate risks that are material to that activity.</p> <p>2. The physical climate risks that are material to the activity have been identified from those listed in Appendix A to the Annex II of the Climate Delegated Act by performing a robust climate risk and vulnerability assessment with the following steps: (a) screening of the activity to identify which physical climate risks from the list in Appendix A to the Annex II of the Climate Delegated Act may affect the performance of the economic activity during its expected lifetime;</p> <p>(b) where the activity is assessed to be at risk from one or more of the physical climate risks listed in Appendix A to the Annex II of the Climate Delegated Act., a climate risk and vulnerability assessment to assess the materiality of the physical climate risks on the economic activity;</p> <p>(c) an assessment of adaptation solutions that can reduce the identified physical climate risk. The climate risk and vulnerability assessment is proportionate to the scale of the activity and its expected lifespan, such that:</p> <p>(a) for activities with an expected lifespan of less than 10 years, the assessment is performed, at least by using climate projections at the smallest appropriate scale;</p> <p>(b) for all other activities, the assessment is performed using the highest available resolution, state-of-the-art climate projections across the existing range of future scenarios consistent with the expected lifetime of the activity, including, at least, 10 to 30 year climate projections scenarios for major investments.</p>	<p>Generali confirmed these criteria.</p> <p>Based on the above, Sustainalytics assessed this to be aligned with the EU Taxonomy criteria.</p>	Aligned

	<p>3. The climate projections and assessment of impacts are based on best practice and available guidance and take into account the state-of-the-art science for vulnerability and risk analysis and related methodologies in line with the most recent Intergovernmental Panel on Climate Change reports, scientific peer-reviewed publications and open source or paying models.</p> <p>4. The adaptation solutions implemented:</p> <p>(a) do not adversely affect the adaptation efforts or the level of resilience to physical climate risks of other people, of nature, of cultural heritage, of assets and of other economic activities;</p> <p>(b) favour nature-based solutions or rely on blue or green infrastructure to the extent possible;</p> <p>(c) are consistent with local, sectoral, regional or national adaptation plans and strategies;</p> <p>(d) are monitored and measured against pre-defined indicators and remedial action is considered where those indicators are not met;</p> <p>(e) where the solution implemented is physical and consists in an activity for which technical screening criteria have been specified in this Annex, the solution complies with the do no significant harm technical screening criteria for that activity.</p>		
<b>DNSH Criteria</b>		<b>Alignment with DNSH Criteria</b>	
Climate change mitigation	<p>The building is not dedicated to extraction, storage, transport or manufacture of fossil fuels. The Primary Energy Demand (PED) setting out the energy performance of the building resulting from the construction does not exceed the threshold set for the nearly zero-energy building (NZEB) requirements in national regulation implementing Directive 2010/31/EU. The energy performance is certified using an as built Energy Performance Certificate (EPC).</p>	<p>Generali confirmed to Sustainalytics that the buildings will not be used for extraction, storage, transport or manufacture of fossil fuels. Generali has communicated to Sustainalytics that the projects financed under the Framework are located in the EU and comply with the relevant EU and national regulations. The energy performance will be certified using as built EPC.</p> <p>Based on the above, Sustainalytics considers this activity to be aligned.</p>	Aligned
Sustainable use and protection of water and marine resources	<p>Where installed, except for installations in residential building units, the specified water use for the following water appliances are attested by product datasheets, a building certification or an existing product label in the Union, in accordance with the technical specifications laid down in Appendix E to the Annex II of the Climate Delegated Act.</p> <ul style="list-style-type: none"> <li>e) wash hand basin taps and kitchen taps have a maximum water flow of 6 litres/min;</li> <li>f) showers have a maximum water flow of 8 litres/min;</li> <li>g) WCs, including suites, bowls and flushing cisterns, have a full flush volume of a maximum of 6 litres and a maximum average flush volume of 3,5 litres;</li> </ul>	<p>1. Generali has communicated to Sustainalytics that as part of its due diligence process the Group adopts the Green Public Procurement Criteria for Sanitary Tapware<sup>210</sup> which specifies the maximum water flow of 6 and 8 litre/min for a) wash hand basin taps and kitchen taps and b) showers respectively. Further, Generali confirmed that the WCs will meet the limit the full flush volume to 6 litres and average flush volume to 3.5 litres and urinals will meet the limit the maximum 2 litres/bowl/hour and flushing will meet the limit the maximum full flush volume of 1 litre Generali also confirmed compliance with the EU Water Framework Directive (2000/60/EC).</p>	Aligned

<sup>210</sup> EU GPP Criteria for Sanitary Tapware, at: [https://susproc.jrc.ec.europa.eu/product-bureau/sites/default/files/contenttype/product\\_group\\_documents/1581682812/GPP\\_criteria\\_Final.pdf](https://susproc.jrc.ec.europa.eu/product-bureau/sites/default/files/contenttype/product_group_documents/1581682812/GPP_criteria_Final.pdf)

	<p>h) urinals use a maximum of 2 litres/bowl/hour. Flushing urinals have a maximum full flush volume of 1 litre.</p> <p>To avoid impact from the construction site, demonstrate the activity complies with the criteria set out in Appendix B to the Annex II of the Climate Delegated Act.</p>	<p>2. Refer to the assessment set out in Appendix 3, Table 37. Based on the above, Sustainalytics considers this activity to be aligned.</p>	
Transition to a circular economy	<p>At least 70 % (by weight) of the non-hazardous construction and demolition waste (excluding naturally occurring material referred to in category 17 05 04 in the European List of Waste established by Decision 2000/532/EC) generated on the construction site is prepared for reuse, recycling and other material recovery, including backfilling operations using waste to substitute other materials, in accordance with the waste hierarchy and the EU Construction and Demolition Waste Management Protocol.<sup>211</sup> Further confirm that operators limit waste generation in processes related to construction and demolition, in accordance with the EU Construction and Demolition Waste Management Protocol and taking into account best available techniques and using selective demolition to enable removal and safe handling of hazardous substances and facilitate reuse and high-quality recycling by selective removal of materials, using available sorting systems for construction and demolition waste.</p> <p>Building designs and construction techniques support circularity and in particular demonstrate, with reference to ISO 20887<sup>212</sup> or other standards for assessing the disassembly or adaptability of buildings, how they are designed to be more resource efficient, adaptable, flexible and dismantlable to enable reuse and recycling.</p>	<p>Generali has communicated to Sustainalytics that the projects financed under the Framework are located in the EU and comply with the relevant EU and national regulations. Italy's waste regulation is in compliance with the EU's Waste Framework Directive<sup>213</sup> which requires that preparation for reuse, recycling and other material recovery, including backfilling operations using waste to substitute other materials, of non-hazardous construction and demolition waste excluding naturally occurring material defined in category 17 05 04 in the list of waste to be increased to a minimum of 70 % by weight.</p> <p>Generali has communicated to Sustainalytics that the construction projects will have a waste management in place that are in accordance with the EU Construction and Demolition Waste Management Protocol regarding limiting waste generation in processes related to construction and demolition.</p> <p>Aligned</p> <p>Based on the above, Sustainalytics considers this activity to be aligned.</p>	Aligned
Pollution prevention and control	<p>Building components and materials used in the construction comply with the criteria set out in Appendix C to the Annex II of the Climate Delegated Act.</p> <p>Building components and materials used in the construction that may come into contact with occupiers<sup>214</sup> emit less than 0,06 mg of formaldehyde per m<sup>3</sup> of material or component upon testing in accordance with the conditions specified in Annex XVII to Regulation (EC) No 1907/2006 and less than 0,001 mg of other categories 1A and 1B carcinogenic volatile organic compounds per m<sup>3</sup> of material or component, upon testing in accordance with CEN/EN 16516<sup>215</sup> or ISO</p>	<p>Generali has communicated to Sustainalytics that the financed building construction activities in Italy and other EU Member States will comply with the below European and national standards to mitigate noise, dust, and pollutant emissions during construction or maintenance works:</p> <ul style="list-style-type: none"> <li>▪ EU Directive on Environmental Impact Assessment in accordance with Directive 2011/92/EU can be assumed to be transposed into national regulation</li> <li>▪ EU Regulation 1907/2006 (Dec 2006) concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH)</li> </ul>	Aligned

<sup>211</sup> EU Construction and Demolition Waste Protocol (: [https://ec.europa.eu/growth/content/eu-construction-and-demolition-waste-protocol-0\\_en](https://ec.europa.eu/growth/content/eu-construction-and-demolition-waste-protocol-0_en)).

<sup>212</sup> ISO 20887:2020, Sustainability in buildings and civil engineering works - Design for disassembly and adaptability - Principles, requirements and guidance (: <https://www.iso.org/standard/69370.html>).

<sup>213</sup> European Commission, "Waste Framework Directive (WFD) - Directive (EU) 2018/851", at: <https://circular-cities-and-regions.ec.europa.eu/support-materials/eu-regulations-legislation/waste-framework-directive-wfd-directive-eu-2018851-0#:~:text=This%20is%20Directive%20%28EU%29%202018%2F851%20of%20the%20European,treated%20and%20managed%20at%20regional%20and%20local%20level.>

<sup>214</sup> Applying to paints and varnishes, ceiling tiles, floor coverings, including associated adhesives and sealants, internal insulation and interior surface treatments, such as those to treat damp and mould.

<sup>215</sup> CEN/TS 16516: 2013, Construction products - Assessment of release of dangerous substances - Determination of emissions into indoor air.

	<p>16000-3:2011<sup>216</sup> or other equivalent standardised test conditions and determination methods.<sup>217</sup></p> <p>Where the new construction is located on a potentially contaminated site (brownfield site), demonstrate that the site has been subject to an investigation for potential contaminants, for example using standard ISO 18400.<sup>218</sup></p> <p>Measures are taken to reduce noise, dust and pollutant emissions during construction or maintenance works.</p>	<ul style="list-style-type: none"> <li>▪ CEN/TS 16516:2013 Construction products - Assessment of release of dangerous substances - Determination of emissions into indoor air"</li> </ul> <p>The Group further confirmed that the following criteria will be covered by its due diligence process:</p> <ul style="list-style-type: none"> <li>▪ Building components and materials used in the building renovation that may come into contact with occupiers will emit less than 0.001 mg of other categories 1A and 1B carcinogenic volatile organic compounds per m3 of material or component upon testing in accordance with CEN/EN 16516 or ISO 16000-3:2011 or other equivalent standardised test conditions and determination methods</li> <li>▪ New construction located on a potentially contaminated site (brownfield site) will be subject to investigation for potential contaminants, such as using standard ISO 18400</li> <li>▪ Measures will be taken to reduce noise, dust and pollutant emissions during construction or maintenance works.</li> </ul> <p>Generali confirmed to Sustainalytics that in accordance to guidance from Italy's Directorate of General Health, the due diligence process checks if the formaldehyde is below 0.05 mg/m<sup>3</sup>.</p> <p>Based on the above, Sustainalytics considers this activity to be aligned.</p>	
<p>Protection and restoration of biodiversity and ecosystems</p>	<p>The activity complies with the criteria set out in Appendix D to Annex II of the Climate Delegated Act.</p> <p>The new construction is not built on one of the following:</p> <ul style="list-style-type: none"> <li>d) arable land and crop land with a moderate to high level of soil fertility and below ground biodiversity as referred to the EU LUCAS survey;<sup>219</sup></li> <li>e) greenfield land of recognised high biodiversity value and land that serves as habitat of endangered species (flora and fauna) listed on the European Red List<sup>220</sup> or the IUCN Red List;<sup>221</sup></li> </ul>	<p>Generali has communicated to Sustainalytics that a due diligence process in place which ensures that a new construction will not be built on the following land as defined in the EU Taxonomy:</p> <ul style="list-style-type: none"> <li>a) arable land and crop land with a moderate to high level of soil fertility and below ground biodiversity as referred to the EU LUCAS survey;</li> <li>b) greenfield land of recognised high biodiversity value and land that serves as habitat of endangered species (flora and fauna) listed on the European Red List or the IUCN Red List;</li> </ul>	<p>Aligned</p>

<sup>216</sup> ISO 16000-3:2011, Indoor air – Part 3: Determination of formaldehyde and other carbonyl compounds in indoor air and test chamber air – Active sampling method : <https://www.iso.org/standard/51812.html>).

<sup>217</sup> The emissions thresholds for carcinogenic volatile organic compounds relate to a 28-day test period.

<sup>218</sup> ISO 18400 series on Soil quality – Sampling.

<sup>219</sup> JRC ESDCA, LUCAS: Land Use and Coverage Area frame Survey : <https://esdac.jrc.ec.europa.eu/projects/lucas>

<sup>220</sup> IUCN, The IUCN European Red List of Threatened Species : <https://www.iucn.org/regions/europe/our-work/biodiversity-conservation/european-red-list-threatenedspecies>).

<sup>221</sup> IUCN, The IUCN Red List of Threatened Species : <https://www.iucnredlist.org>).

	<p>f) land matching the definition of forest as set out in national law used in the national greenhouse gas inventory, or where not available, is in accordance with the FAO definition of forest.<sup>222</sup></p>	<p>c) land matching the definition of forest as set out in national law used in the national greenhouse gas inventory, or where not available, is in accordance with the FAO definition of forest.</p> <p>Generali has further communicated to Sustainalytics that it will not finance companies or projects that have negative impact on UNESCO World Heritage Sites, wetlands according to the Ramsar Convention 6, IUCN protected areas, categories I to VI. The Group will comply with the national and supranational regulations to mandate environmental impact assessment (EU Directive on EIA in accordance with Directive 2011/92/EU, and Legislative Decree 152/2006)</p> <p>Based on the above, Sustainalytics considers this activity to be aligned.</p>	
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Table 34

<b>Framework Activity assessed</b>		Green Buildings	
<b>EU Taxonomy Activity</b>		7.2. Renovation of existing buildings	
<b>Associated NACE Codes</b>		F41 and F43	
<b>EU Technical Screening Criteria</b>		<b>Alignment with Technical Screening Criteria</b>	
Adaptation	<p>1. The economic activity has implemented physical and non-physical solutions ('adaptation solutions') that substantially reduce the most important physical climate risks that are material to that activity.</p> <p>2. The physical climate risks that are material to the activity have been identified from those listed in Appendix A to the Annex II of the Climate Delegated Act by performing a robust climate risk and vulnerability assessment with the following steps:</p> <p>(a) screening of the activity to identify which physical climate risks from the list in Appendix A to the Annex II of the Climate Delegated Act may affect the performance of the economic activity during its expected lifetime;</p> <p>(b) where the activity is assessed to be at risk from one or more of the physical climate risks listed in Appendix A to the Annex II of the Climate Delegated Act, a climate risk and vulnerability assessment to assess the materiality of the physical climate risks on the economic activity;</p> <p>(c) an assessment of adaptation solutions that can reduce the identified physical climate risk.</p>	<p>Generali confirmed these criteria.</p> <p>Based on the above, Sustainalytics assessed this to be aligned with the EU Taxonomy criteria.</p>	Aligned

<sup>222</sup> Land spanning more than 0,5 hectares with trees higher than five meters and a canopy cover of more than 10 %, or trees able to reach those thresholds in situ. It does not include land that is predominantly under agricultural or urban land use, FAO Global Resources Assessment 2020. Terms and definitions. : <http://www.fao.org/3/I8661EN/i8661en.pdf>.

	<p>The climate risk and vulnerability assessment is proportionate to the scale of the activity and its expected lifespan, such that: (a) for activities with an expected lifespan of less than 10 years, the assessment is performed, at least by using climate projections at the smallest appropriate scale;</p> <p>(b) for all other activities, the assessment is performed using the highest available resolution, state-of-the-art climate projections across the existing range of future scenario consistent with the expected lifetime of the activity, including, at least, 10 to 30 year climate projections scenarios for major investments.</p> <p>3. The climate projections and assessment of impacts are based on best practice and available guidance and take into account the state-of-the-art science for vulnerability and risk analysis and related methodologies in line with the most recent Intergovernmental Panel on Climate Change reports, scientific peer-reviewed publications and open source or paying models.</p> <p>4. The adaptation solutions implemented:</p> <p>(a) do not adversely affect the adaptation efforts or the level of resilience to physical climate risks of other people, of nature, of cultural heritage, of assets and of other economic activities;</p> <p>(b) favour nature-based solutions<sup>586</sup> or rely on blue or green infrastructure<sup>587</sup> to the extent possible;</p> <p>(c) are consistent with local, sectoral, regional or national adaptation plans and strategies;</p> <p>(d) are monitored and measured against pre-defined indicators and remedial action is considered where those indicators are not met;</p> <p>(e) where the solution implemented is physical and consists in an activity for which technical screening criteria have been specified in this Annex, the solution complies with the do no significant harm technical screening criteria for that activity</p>		
<b>DNSH Criteria</b>		<b>Alignment with DNSH Criteria</b>	
Climate change mitigation	The building is not dedicated to extraction, storage, transport or manufacture of fossil fuels.	Generali confirmed to Sustainalytics that the buildings will not be used for extraction, storage, transport or manufacture of fossil fuels. Based on the above, Sustainalytics considers this activity to be aligned.	Aligned
Sustainable use and protection of water and marine resources	<p>Where installed as part of the renovation works, except for renovation works in residential building units, confirm that the specified water use for the following water appliances is attested by product datasheets, a building certification or an existing product label in the Union, in accordance with the technical specifications laid down in <a href="#">Appendix E</a> to the Annex II of the Climate Delegated Act.:</p> <p>a) wash hand basin taps and kitchen taps have a maximum water flow of 6 litres/min;</p> <p>b) showers have a maximum water flow of 8 litres/min;</p>	<p>1. Generali has communicated to Sustainalytics that as part of its due diligence process the Group adopts the Green Public Procurement Criteria for Sanitary Tapware which specifies the maximum water flow of 6 and 8 litre/min for a) wash hand basin taps and kitchen taps and b) showers respectively.</p> <p>Further, Generali confirmed that the WCs will meet the limit the full flush volume to 6 litres and average flush volume to 3.5 litres and urinals will meet the limit the maximum 2 litres/bowl/hour and flushing will meet the limit the maximum full flush volume of 1 litre</p>	Aligned

	<p>c) WCs, including suites, bowls and flushing cisterns, have a full flush volume of a maximum of 6 litres and a maximum average flush volume of 3,5 litres;</p> <p>d) urinals use a maximum of 2 litres/bowl/hour. Flushing urinals have a maximum full flush volume of 1 litre.</p>	Based on the above, Sustainalytics considers this activity to be aligned.	
Transition to a circular economy	<p>At least 70 % (by weight) of the non-hazardous construction and demolition waste (excluding naturally occurring material referred to in category 17 05 04 in the European List of Waste established by Decision 2000/532/EC) generated on the construction site is prepared for reuse, recycling and other material recovery, including backfilling operations using waste to substitute other materials, in accordance with the waste hierarchy and the EU Construction and Demolition Waste Management Protocol.<sup>223</sup> Further confirm that operators limit waste generation in processes related construction and demolition, in accordance with the EU Construction and Demolition Waste Management Protocol and taking into account best available techniques and using selective demolition to enable removal and safe handling of hazardous substances and facilitate reuse and high-quality recycling by selective removal of materials, using available sorting systems for construction and demolition waste.</p> <p>Building designs and construction techniques support circularity and in particular demonstrate, with reference to ISO 20887<sup>224</sup> or other standards for assessing the disassembly or adaptability of buildings, how they are designed to be more resource efficient, adaptable, flexible and dismantlable to enable reuse and recycling.</p>	<p>Generali has communicated to Sustainalytics that the projects financed under the Framework are located in the EU and comply with the relevant EU and national regulations. Italy's waste regulation is in compliance with the EU's Waste Framework Directive<sup>225</sup> which requires that preparation for reuse, recycling and other material recovery, including backfilling operations using waste to substitute other materials, of non-hazardous construction and demolition waste excluding naturally occurring material defined in category 17 05 04 in the list of waste to be increased to a minimum of 70 % by weight.</p> <p>Generali has communicated to Sustainalytics that the construction projects will have a waste management in place that are in accordance with the EU Construction and Demolition Waste Management Protocol regarding limiting waste generation in processes related to construction and demolition.</p> <p>Aligned</p> <p>Based on the above, Sustainalytics considers this activity to be aligned.</p>	Aligned
Pollution prevention and control	<p>Buildings components and materials used in the construction complies with the criteria set out in Appendix C to the Annex II of the Climate Delegated Act.</p> <p>Buildings components and materials used in the building renovation that may come into contact with occupiers<sup>226</sup> emit less than 0,06 mg of formaldehyde per m<sup>3</sup> of material or component upon testing in accordance with the conditions specified in Annex XVII to Regulation (EC) No 1907/2006 and less than 0,001 mg of other categories 1A and 1B carcinogenic volatile organic compounds per m<sup>3</sup> of material or component,</p>	<p>Generali has communicated to Sustainalytics that the financed building construction activities in Italy and other EU Member States will comply with the below European and national standards to mitigate noise, dust, and pollutant emissions during construction or maintenance works:</p> <ul style="list-style-type: none"> <li>▪ EU Directive on Environmental Impact Assessment in accordance with Directive 2011/92/EU can be assumed to be transposed into national regulation</li> <li>▪ EU Regulation 1907/2006 (Dec 2006) concerning the Registration, Evaluation, Authorisation and Restriction of Chemicals (REACH)</li> </ul>	Aligned

<sup>223</sup> EU Construction and Demolition Waste Protocol : [https://ec.europa.eu/growth/content/eu-construction-and-demolition-waste-protocol-0\\_en](https://ec.europa.eu/growth/content/eu-construction-and-demolition-waste-protocol-0_en).

<sup>224</sup> ISO 20887:2020, Sustainability in buildings and civil engineering works - Design for disassembly and adaptability - Principles, requirements and guidance : <https://www.iso.org/standard/69370.html>.

<sup>225</sup> European Commission, "Waste Framework Directive (WFD) - Directive (EU) 2018/851", at: <https://circular-cities-and-regions.ec.europa.eu/support-materials/eu-regulations-legislation/waste-framework-directive-wfd-directive-eu-2018851-0#:~:text=This%20is%20Directive%20%28EU%29%202018%2F851%20of%20the%20European,treated%20and%20managed%20at%20regional%20and%20local%20level.>

<sup>226</sup> Applying to paints and varnishes, ceiling tiles, floor coverings (including associated adhesives and sealants), internal insulation and interior surface treatments (such as to treat damp and mould).

	<p>upon testing in accordance with CEN/EN 16516 or ISO 16000-3:2011<sup>227</sup> or other equivalent standardised test conditions and determination methods.<sup>228</sup></p> <p>Measures are taken to reduce noise, dust and pollutant emissions during construction or maintenance works.</p>	<ul style="list-style-type: none"> <li>▪ CEN/TS 16516:2013 Construction products - Assessment of release of dangerous substances - Determination of emissions into indoor air"</li> </ul> <p>The Group further confirmed that the following criteria will be covered by its due diligence process:</p> <ul style="list-style-type: none"> <li>▪ Building components and materials used in the building renovation that may come into contact with occupiers will emit less than 0.001 mg of other categories 1A and 1B carcinogenic volatile organic compounds per m3 of material or component upon testing in accordance with CEN/EN 16516 or ISO 16000-3:2011 or other equivalent standardised test conditions and determination methods</li> <li>▪ New construction located on a potentially contaminated site (brownfield site) will be subject to investigation for potential contaminants, such as using standard ISO 18400</li> <li>▪ Measures will be taken to reduce noise, dust and pollutant emissions during construction or maintenance works</li> </ul> <p>Generali confirmed to Sustainalytics that in accordance to guidance from Italy's Directorate of General Health, the due diligence process checks if the formaldehyde is below 0.05 mg/m<sup>3</sup>.</p> <p>Based on the above, Sustainalytics considers this activity to be aligned.</p>	
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Table 35

<b>Framework Activity assessed</b>		Green Buildings	
<b>EU Taxonomy Activity</b>		7.7. Acquisition and ownership of buildings	
<b>Associated NACE Code</b>		L68	
<b>EU Technical Screening Criteria</b>		<b>Alignment with Technical Screening Criteria</b>	
Adaptation	<ol style="list-style-type: none"> <li>1. The economic activity has implemented physical and non-physical solutions ('adaptation solutions') that substantially reduce the most important physical climate risks that are material to that activity.</li> <li>2. The physical climate risks that are material to the activity have been identified from those listed in Appendix A to the Annex II of the Climate</li> </ol>	<p>Generali confirmed these criteria.</p> <p>Based on the above, Sustainalytics assessed this to be aligned with the EU Taxonomy criteria.</p>	Aligned

<sup>227</sup> ISO 16000-3:2011, Indoor air – Part 3: Determination of formaldehyde and other carbonyl compounds in indoor air and test chamber air – Active sampling method : <https://www.iso.org/standard/51812.html>).

<sup>228</sup> The emissions thresholds for carcinogenic volatile organic compounds relate to a 28-day test period.

	<p>Delegated Act by performing a robust climate risk and vulnerability assessment with the following steps:</p> <ul style="list-style-type: none"> <li>(a) screening of the activity to identify which physical climate risks from the list in Appendix A to the Annex II of the Climate Delegated Act may affect the performance of the economic activity during its expected lifetime;</li> <li>(b) where the activity is assessed to be at risk from one or more of the physical climate risks listed in Appendix A to the Annex II of the Climate Delegated Act, a climate risk and vulnerability assessment to assess the materiality of the physical climate risks on the economic activity;</li> <li>(c) an assessment of adaptation solutions that can reduce the identified physical climate risk.</li> </ul> <p>The climate risk and vulnerability assessment is proportionate to the scale of the activity and its expected lifespan, such that:</p> <ul style="list-style-type: none"> <li>(a) for activities with an expected lifespan of less than 10 years, the assessment is performed, at least by using climate projections at the smallest appropriate scale;</li> <li>(b) for all other activities, the assessment is performed using the highest available resolution, state-of-the-art climate projections across the existing range of future scenarios consistent with the expected lifetime of the activity, including, at least, 10 to 30 year climate projections scenarios for major investments.</li> </ul> <p>3. The climate projections and assessment of impacts are based on best practice and available guidance and take into account the state-of-the-art science for vulnerability and risk analysis and related methodologies in line with the most recent Intergovernmental Panel on Climate Change reports, scientific peer-reviewed publications and open source or paying models.</p> <p>4. The adaptation solutions implemented:</p> <ul style="list-style-type: none"> <li>(a) do not adversely affect the adaptation efforts or the level of resilience to physical climate risks of other people, of nature, of cultural heritage, of assets and of other economic activities;</li> <li>(b) favour nature-based solutions or rely on blue or green infrastructure to the extent possible;</li> <li>(c) are consistent with local, sectoral, regional or national adaptation plans and strategies;</li> <li>(d) are monitored and measured against pre-defined indicators and remedial action is considered where those indicators are not met;</li> <li>(e) where the solution implemented is physical and consists in an activity for which technical screening criteria have been specified in this Annex, the solution complies with the do no significant harm technical screening criteria for that activity</li> </ul>			
<b>DNSH Criteria</b>		<b>Alignment with DNSH Criteria</b>		
Climate change mitigation	The building is not dedicated to extraction, storage, transport or manufacture of fossil fuels.	Generali confirmed to Sustainalytics that for buildings built before 31 December 2020, the building will have at least an Energy Performance Certificate (EPC) class C. As an alternative, the	Aligned	

	<p>For buildings built before 31 December 2020, the building has at least an Energy Performance Certificate (EPC) class C. As an alternative, the building is within the top 30% of the national or regional building stock expressed as operational Primary Energy Demand (PED) and demonstrated by adequate evidence, which at least compares the performance of the relevant asset to the performance of the national or regional stock built before 31 December 2020 and at least distinguishes between residential and non-residential buildings.</p> <p>For buildings built after 31 December 2020, the Primary Energy Demand (PED) defining the energy performance of the building resulting from the construction does not exceed the threshold set for the nearly zero-energy building (NZEB) requirements in national regulation implementing Directive 2010/31/EU. The energy performance is certified using an as built Energy Performance Certificate (EPC).</p>	<p>building will be within the top 30 % of the national or regional building stock expressed as operational Primary Energy Demand (PED) and demonstrated by adequate evidence, which at least compares the performance of the relevant asset to the performance of the national or regional stock built before 31 December 2020 and at least distinguishes between residential and non-residential buildings.</p> <p>Generali also communicated that for buildings built after 31 December 2020, the Primary Energy Demand (PED) defining the energy performance of the building resulting from the construction will not exceed the threshold set for the nearly zero-energy building (NZEB) requirements in national regulation implementing Directive 2010/31/EU. The energy performance will be certified using an as built EPC.</p> <p>Based on the above, Sustainalytics considers this activity to be aligned.</p>	
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### Appendix 3: Criteria for Do No Significant Harm (“DNSH”) to Climate Change Adaptation and Protection and Restoration of Biodiversity and Ecosystems

Table 36

Criteria for DNSH to Climate Change Adaptation		
DNSH Criteria	Alignment with DNSH Criteria	
<p>The physical climate risks that are material to the activity have been identified from those listed in the table in Section II of this Appendix by performing a robust climate risk and vulnerability assessment with the following steps:</p> <ul style="list-style-type: none"> <li>a. screening of the activity to identify which physical climate risks from the list in Section II of this Appendix may affect the performance of the economic activity during its expected lifetime;</li> <li>b. where the activity is assessed to be at risk from one or more of the physical climate risks listed in Section II of this Appendix, a climate risk and vulnerability assessment to assess the materiality of the physical climate risks on the economic activity;</li> <li>c. an assessment of adaptation solutions that can reduce the identified physical climate risk.</li> </ul> <p>The climate risk and vulnerability assessment is proportionate to the scale of the activity and its expected lifespan, such that:</p> <ul style="list-style-type: none"> <li>a. for activities with an expected lifespan of less than 10 years, the assessment is performed, at least by using climate projections at the smallest appropriate scale;</li> <li>b. for all other activities, the assessment is performed using the highest available resolution, state-of-the-art climate projections across the existing range of future</li> </ul>	<p>Group Risk Management has recently adapted its Clim@risk tool to comply with the requirements of the EU Taxonomy in terms of time horizon, scenarios and resolution (evidence available on demand) All analyses evaluate risks and vulnerability on a 30-year horizon.</p> <p>Generali plans to engage third parties to identify adaptation actions on projects at material physical risk.</p> <p>Generali plans to engage third parties to identify adaptation actions on projects at material physical risk, which do not adversely affect the adaptation efforts or the level of resilience to physical climate risks of other people, of nature, of assets and of other economic activities.</p> <p>Generali plans to engage third parties to identify adaptation actions on projects at material physical risk coherent with the national and EU Adaptation plans and strategies.</p> <p>Generali plans to set up monitoring system on the implementation within 5 years. In case of non-implementation, the project shall not be considered eligible.</p>	<p>Aligned</p>

<p>scenarios<sup>229</sup> consistent with the expected lifetime of the activity, including, at least, 10 to 30 year climate projections scenarios for major investments.</p> <p>The climate projections and assessment of impacts are based on best practice and available guidance and take into account the state-of-the-art science for vulnerability and risk analysis and related methodologies in line with the most recent Intergovernmental Panel on Climate Change reports<sup>230</sup>, scientific peer-reviewed publications, and open source<sup>231</sup> or paying model</p> <p>For existing activities and new activities using existing physical assets, the economic operator implements physical and non-physical solutions ('adaptation solutions'), over a period of time of up to five years, that reduce the most important identified physical climate risks that are material to that activity. An adaptation plan for the implementation of those solutions is drawn up accordingly.</p> <p>For new activities and existing activities using newly-built physical assets, the economic operator integrates the adaptation solutions that reduce the most important identified physical climate risks that are material to that activity at the time of design and construction and has implemented them before the start of operations.</p> <p>The adaptation solutions implemented do not adversely affect the adaptation efforts or the level of resilience to physical climate risks of other people, of nature, of cultural heritage, of assets and of other economic activities; are consistent with local, sectoral, regional or national adaptation strategies and plans; and consider the use of nature - based solutions<sup>232</sup> or rely on blue or green infrastructure<sup>233</sup> to the extent possible.</p>		
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*Table 37* Criteria for the Sustainable Use and Protection of Water and Marine Resources

<b>DNSH Criteria</b>	<b>Alignment</b>	
<ul style="list-style-type: none"> <li>Environmental degradation risks related to preserving water quality and avoiding water stress are identified and addressed with the aim of achieving good water status and good ecological potential as defined in Article 2, points (22) and (23), of Regulation (EU) 2020/852, in accordance with Directive 2000/60/EC of the European Parliament and of the Council and a water use and protection management plan,</li> </ul>	<p>As part of Generali assessment due diligence for investments and real estate, assets that are likely to have significant effects on the environment by virtue of their size, nature or location are required to undergo an environmental impact assessment (EIA) which is to be submitted to competent authorities when applying for project development. Generali ensures compliance with all national regulatory requirements applicable to all projects, included the ones included in</p>	<p>Aligned</p>

<sup>229</sup> Future scenarios include Intergovernmental Panel on Climate Change representative concentration pathways RCP2.6, RCP4.5, RCP6.0 and RCP8.5

<sup>230</sup> Assessments Reports on Climate Change: Impacts, Adaptation and Vulnerability, published periodically by the Intergovernmental Panel on Climate Change (IPCC), the United Nations body for assessing the science related to climate change produces, <https://www.ipcc.ch/reports/>.

<sup>231</sup> Such as Copernicus services managed by the European Commission.

<sup>232</sup> Nature-based solutions are defined as 'solutions that are inspired and supported by nature, which are cost-effective, simultaneously provide environmental, social and economic benefits and help build resilience. Such solutions bring more, and more diverse, nature and natural features and processes into cities, landscapes and seascapes, through locally adapted, resource-efficient and systemic interventions'. Therefore, nature-based solutions benefit biodiversity and support the delivery of a range of ecosystem services. (: <https://ec.europa.eu/research/environment/index.cfm?pg=nbs>).

<sup>233</sup> Nature-based solutions are defined as 'solutions that are inspired and supported by nature, which are cost-effective, simultaneously provide environmental, social and economic benefits and help build resilience. Such solutions bring more, and more diverse, nature and natural features and processes into cities, landscapes and seascapes, through locally adapted, resource-efficient and systemic interventions'. Therefore, nature-based solutions benefit biodiversity and support the delivery of a range of ecosystem services. (: <https://ec.europa.eu/research/environment/index.cfm?pg=nbs>).

<p>developed thereunder for the potentially affected water body or bodies, in consultation with relevant stakeholders.</p> <ul style="list-style-type: none"> <li>• Where an Environmental Impact Assessment is carried out in accordance with Directive 2011/92/EU of the European Parliament and of the Council and includes an assessment of the impact on water in accordance with Directive 2000/60/EC, no additional assessment of impact on water is required, provided the risks identified have been addressed.</li> </ul>	<p>the eligible pool. The Water Framework Directive (WFD) 2000/60/EC was given legal effect in all the European Countries financed under this Framework.<sup>234</sup> "</p> <p>EIA to be carried out in accordance with Directive 2011/92/EU as transposed in EU member states. Generali reviews Technical Due Diligence reports on all major projects. These will typically address environmental concerns and where necessary would lead to more in-depth environmental reviews, which would also be gathered and reviewed as part of the credit approval process.</p>	
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Table 38

Criteria for Pollution Prevention and Control Regarding Use and Presence of Chemicals		
<b>DNSH Criteria</b>	<b>Alignment with DNSH Criteria</b>	
<p>The activity does not lead to the manufacture, placing on the market or use of:</p> <ul style="list-style-type: none"> <li>a) substances, whether on their own, in mixtures or in articles, listed in Annexes I or II to Regulation (EU) 2019/1021 of the European Parliament and of the Council, except in the case of substances present as an unintentional trace contaminant</li> <li>b) mercury and mercury compounds, their mixtures and mercury-added products as defined in Article 2 of Regulation (EU) 2017/852 of the European Parliament and of the Council</li> <li>c) substances, whether on their own, in mixture or in articles, listed in Annexes I or II to Regulation (EC) No 1005/2009 of the European Parliament and of the Council</li> <li>d) substances, whether on their own, in mixtures or in an articles, listed in Annex II to Directive 2011/65/EU of the European Parliament and of the Council<sup>331</sup>, except where there is full compliance with Article 4(1) of that Directive</li> <li>e) substances, whether on their own, in mixtures or in an article, listed in Annex XVII to Regulation (EC) 1907/2006 of the European Parliament and of the Council, except where there is full compliance with the conditions specified in that Annex</li> <li>f) substances, whether on their own, in mixtures or in an article, meeting the criteria laid down in Article 57 of Regulation (EC) 1907/2006 and identified in accordance with Article 59(1) of that Regulation, except where their use has been proven to be essential for the society</li> <li>g) other substances, whether on their own, in mixtures or in an article, that meet the criteria laid down in Article 57 of Regulation (EC) 1907/2006, except where their use has been proven to be essential for the society.</li> </ul>	<ul style="list-style-type: none"> <li>a) Regulation (EU) 2019/1021 on persistent organic pollutants is implemented in EU member states.</li> <li>b) Regulation (EU) 2017/852 is implemented in the UK by The Control of Mercury (Enforcement) Regulations 2017 (referred to as the Control of Mercury Regulations) came into force in member states where Generali will select projects for the purpose of the Framework.</li> <li>c) Regulation (EC) No 1005/2009 is implemented in EU member states.</li> <li>d) Directive 2011/65/EU<sup>117</sup> is transposed as regulation within EU member states.</li> <li>e) Regulation (EC) 1907/2006 is implemented by The EU REACH Regulation within EU member states.</li> <li>f) Regulation (EC) 1907/2006 is implemented by The EU REACH Regulation within EU member states.</li> <li>g) Regulation (EC) 1907/2006 is implemented by The EU REACH Regulation within EU member states.</li> </ul>	<p>Aligned</p>

<sup>234</sup> EU Commission, "Directive 2000/60/EC of the European Parliament and of the Council of 23 October 2000 establishing a framework for Community action in the field of water policy – National transposition", at: <https://eur-lex.europa.eu/legal-content/EN/NIM/?uri=celex:32000L0060>

Table 39

Criteria for the Protection and Restoration of Biodiversity and Ecosystems		
<b>DNSH Criteria</b>	<b>Alignment with DNSH Criteria</b>	
<ul style="list-style-type: none"> <li>An Environmental Impact Assessment (EIA) or screening has been completed, for activities within the Union, in accordance with Directive 2011/92/EU. For activities in third countries, an EIA has been completed in accordance with equivalent national provisions or international standards.</li> <li>Where an EIA has been carried out, the required mitigation and compensation measures for protecting the environment are implemented.</li> <li>For sites/operations located in or near biodiversity-sensitive areas (including the Natura 2000 network of protected areas, UNESCO World Heritage sites and Key Biodiversity Areas, as well as other protected areas), an appropriate assessment, where applicable, has been conducted and based on its conclusions the necessary mitigation measures are implemented.</li> </ul>	<p>With all eligible projects located in Europe, Generali Group can rely on robust laws and regulation to ensure an EIA has been conducted for these types of infrastructure projects (e.g. Directive 2011/92/EU).</p> <p>When infrastructure debt investments in any greenfield projects are made in Europe, the project sponsors (i.e. the asset owners/developers) shall have previously carried out an EIA, as required in European legislation. Consequently, the project sponsors are responsible for implementing all required mitigation and compensation measures as part of the planning process, including any requisite licenses, permits and approvals, prior to the commencement of construction and operation of the project.</p> <p>When the asset manager invests in infrastructure debt in any greenfield project in Europe, the protection of biodiversity forms a key part of the EIA for all projects, and particularly if it is located in, or near to a recognized biodiversity area. The protection of biodiversity is therefore included as a specific condition of the project licenses, permits and approvals, which typically involves the establishment of dedicated conservation areas, wildlife fencing and bridges and/or tunnels to preserve and protect any species where any loss of habitat or pollution (including noise, artificial lighting and dust) will occur as a result of the construction and development of an infrastructure asset. Such conditions are particularly rigorous if any protected or endangered species are found at the site.</p>	Aligned

Table 40

Technical Specifications for Water Appliances		
<b>DNSH Criteria</b>	<b>Alignment with DNSH Criteria</b>	
<ol style="list-style-type: none"> <li>The flow rate is recorded at the standard reference pressure 3 -0/+ 0,2 bar or 0,1 - 0/+0,02 for products limited to low pressure.</li> <li>The flow rate at the lower pressure 1,5 -0/+ 0,2 bar is <math>\geq 60\%</math> of the maximum available flow rate</li> <li>For mixer showers, the reference temperature is <math>38 \pm 1^\circ\text{C}</math>.</li> <li>Where the flow has to be lower than 6 L/min, it complies with the rule set out in point 2.</li> </ol>	Generali has confirmed to Sustainalytics that it will implement processes to understand compliance of existing and new projects with these DNSH criteria and intends to only include in the pool compliant assets.	Aligned

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<p>5. For taps the procedure described in clause 10.2.3 of EN 200 is followed, with the following exceptions:</p> <ul style="list-style-type: none"><li>(a) for taps that are not limited to low pressure applications only: apply a 3 -0/+0,2 bar pressure to both the hot and the cold inlets, alternatively;</li> <li>(b) for taps that are limited to low pressure applications only: apply a 0,4 -0/+0,02 bar pressure to both the hot and the cold inlets and fully open the flow control. "</li></ul>		
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## Appendix 4: Green Bond / Green Bond Programme - External Review Form

### Section 1. Basic Information

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Issuer name:	Generali
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Green Bond ISIN or Issuer Green Bond Framework Name, if applicable:	Generali Green, Social & Sustainability Bond Framework
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Review provider's name:	Sustainalytics
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Completion date of this form:	December, 2023
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Publication date of review publication:  
Original publication date *[please fill this out for updates]*:

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### Section 2. Review overview

#### SCOPE OF REVIEW

The review:

- assessed the 4 core components of the Principles (**complete review**) and confirmed the alignment with the GBP/SBP/SBG (*delete where appropriate*).
- assessed only some of them (**partial review**) and confirmed the alignment with the GBP/SBP/SBG (*delete where appropriate*); please indicate which ones:
  - Use of Proceeds
  - Management of Proceeds
  - Process for Project Evaluation and Selection
  - Reporting
- assessed the alignment with other regulations or standards (CBI, EU GBS, ASEAN Green Bond Standard, ISO 14030, etc.); please indicate which ones:

#### ROLE(S) OF INDEPENDENT REVIEW PROVIDER

- Second Party Opinion
- Verification
- Other (please specify):
- Certification
- Scoring/Rating

#### Does the review include a sustainability quality score?

- Of the issuer
- Of the Framework
- No scoring
- Of the project
- Other (please specify):

**ASSESSMENT OF THE PROJECT(S)****Does the review include:**

- The environmental and/or social features of the type of project(s) intended for the Use of Proceeds?
- The environmental and/or social benefits and impact targeted by the eligible Green and/or Social Project(s) financed by the Green, Social or Sustainability Bond?
- The potentially material environmental and/or social risks associated with the project(s) (where relevant)?

**ISSUER'S OVERARCHING OBJECTIVES****Does the review include:**

- An assessment of the issuer's overarching sustainability objectives and strategy, and the policies and/or processes towards their delivery?
- An identification and assessment of environmental, social and governance related risks of adverse impact through the Issuer's [actions] and explanations on how they are managed and mitigated by the issuer?
- A reference to the issuer's relevant regulations, standards, or frameworks for sustainability-related disclosure and reporting?

**CLIMATE TRANSITION STRATEGY****Does the review assess:**

- The issuer's climate transition strategy & governance?
- The alignment of both the long-term and short/medium-term targets with the relevant regional, sector, or international climate scenario?
- The credibility of the issuer's climate transition strategy to reach its targets?
- The level/type of independent governance and oversight of the issuer's climate transition strategy (e.g. by independent members of the board, dedicated board sub-committees with relevant expertise, or via the submission of an issuer's climate transition strategy to shareholders' approval).
- If appropriate, the materiality of the planned transition trajectory in the context of the issuers overall business (including the relevant historical datapoints)?
- The alignment of the issuer's proposed strategy and targets with appropriate science-based targets and transition pathways that are deemed necessary to limit climate change to targeted levels?
- The comprehensiveness of the issuer's disclosure to help investors assess its performance holistically?

**Overall comment on this section:**

**Section 3. Detailed review****1. USE OF PROCEEDS****Does the review assess:**

the environmental/social benefits of the project(s)?

whether those benefits are quantifiable and meaningful?

for social projects, whether the target population is properly identified?

**Does the review assess if the issuer provides clear information on:**

- the estimated proceeds allocation per project category (in case of multiple projects)?
- the estimated share of financing vs. re-financing (and the related lookback period)?

**Overall comment on this section:**

The eligible categories for the use of proceeds - Green Buildings, Renewable Energy, Energy Efficiency, Clean Transportation, Climate Adaptation, Environmentally Sustainable Management of Living Natural Resources and Land Use, Access to Essential Services, Affordable Housing and Employment Generation and Programmes are aligned with those recognized by the Green Bond Principles and the Social Bond Principles. Sustainalytics considers that the eligible categories will lead to positive environmental and social impacts and advance the UN Sustainable Development Goals, specifically SDGs. 3, 4, 7, 8, 9, 11, 13 and 15.

## 2. PROCESS FOR PROJECT EVALUATION AND SELECTION

### Does the review assess:

- whether the eligibility of the project(s) is aligned with official or market-based taxonomies or recognised international standards? Please specify which ones. Sustainalytics has a proprietary taxonomy which is influenced by the EU taxonomy, Climate Bonds Initiative taxonomy as well as international standards.
- whether the eligible projects are aligned with the overall sustainability strategy of the issuer and/or if the eligible projects are aligned with material ESG-related objectives in the issuer's industry?
- the process and governance to set the eligibility criteria including, if applicable, exclusion criteria?
- the processes by which the issuer identifies and manages perceived social and environmental risks associated with the relevant project(s)?
- any process in place to identify mitigants to known material risks of negative social and/or environmental impacts from the relevant project(s)?

### Overall comment on this section:

Generali's Sustainability Bond Committee is responsible for and monitoring the eligible green and social assets, which are initially evaluated by the accountable functions with the selected business areas. Generali has set up policies and guidelines to assess and mitigate the environmental and social risks of its activities. Eligible assets are subject to the Generali Group's ESG criteria integrated within its sustainable investment policies. Sustainalytics considers project evaluation and selection process in line with market practice.

## 3. MANAGEMENT OF PROCEEDS

### Does the review assess:

- the issuer's policy for segregating or tracking the proceeds in an appropriate manner?
- the intended types of temporary investment instruments for unallocated proceeds?
- Whether an external auditor will verify the internal tracking of the proceeds and the allocation of the funds?

### Overall comment on this section:

Generali will allocate an amount equivalent to the net proceeds to the eligible projects. Generali's Sustainability Bond Committee is responsible for tracking and managing allocations using its internal accounting systems. In case full allocation is not achieved at issuance, the Group intends to achieve full allocation within next year following the issuance. Pending full allocation, proceeds may be temporarily invested in accordance with Generali's investment guidelines in cash deposits, money market instruments, and socially responsible investments This is aligned with market practice.

## 4. REPORTING

### Does the review assess:

- the expected type of allocation and impact reporting (bond-by-bond or on a portfolio basis)?
- the frequency and the means of disclosure?
- the disclosure of the methodology of the expected or achieved impact of the financed project(s)?

### Overall comment on this section:

Generali intends to report on allocation of proceeds and corresponding environmental and social outputs and impacts on an annual basis until full allocation. The annual report will be available on its website. Allocation reporting will include, amount of net proceeds, balance of unallocated proceeds at reporting end-period (if any), the share of financing versus refinancing, the amount of proceeds allocated to each eligible category,

share of assets aligned with EU Taxonomy criteria and the amount allocated to various geographical regions. Generali also commits to report environmental and social impacts, on each use of proceeds category level on a best-effort basis. Impact reporting will include impact metrics. Sustainalytics views Generali's allocation and impact reporting as aligned with market practice.

#### **Section 4. Additional Information**

**Useful links** (e.g. to the external review provider's methodology or credentials, to the full review, to issuer's documentation, etc.)

**Analysis of the contribution of the project(s) to the UN Sustainable Development Goals:**

**Additional assessment in relation to the issuer/bond framework/eligible project(s):**

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The issuer is fully responsible for certifying and ensuring the compliance with its commitments, for their implementation and monitoring.

In case of discrepancies between the English language and translated versions, the English language version shall prevail.

## About Sustainalytics, a Morningstar Company

Sustainalytics, a Morningstar Company, is a leading ESG research, ratings and data firm that supports investors around the world with the development and implementation of responsible investment strategies. For more than 30 years, the firm has been at the forefront of developing high-quality, innovative solutions to meet the evolving needs of global investors. Today, Sustainalytics works with hundreds of the world's leading asset managers and pension funds who incorporate ESG and corporate governance information and assessments into their investment processes. Sustainalytics also works with hundreds of companies and their financial intermediaries to help them consider sustainability in policies, practices and capital projects. With 17 offices globally, Sustainalytics has more than 1500 staff members, including more than 500 analysts with varied multidisciplinary expertise across more than 40 industry groups.

For more information, visit [www.sustainalytics.com](http://www.sustainalytics.com)

Or contact us [contact@sustainalytics.com](mailto:contact@sustainalytics.com)

