

Human Rights Due Diligence

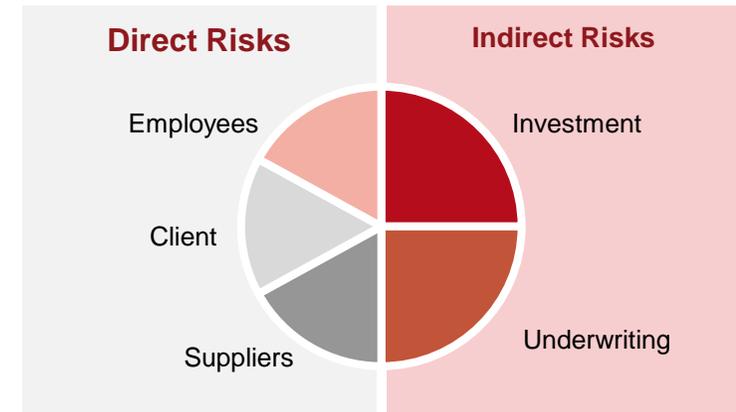
Generali Group



Human Rights Due Diligence | overview

Main goal

- The objective was to **identify the main risks of violation of human rights** for Generali Group, depending on both the businesses and countries where the Group operates.
- The Due Diligence analysis was performed by assessing **direct human rights risks** (i.e., potential risk of human rights violations for Generali's employees, clients and suppliers) as well as **indirect human rights risks** (i.e., potential risk of human rights violations related to the Group's investments and underwriting activities¹).

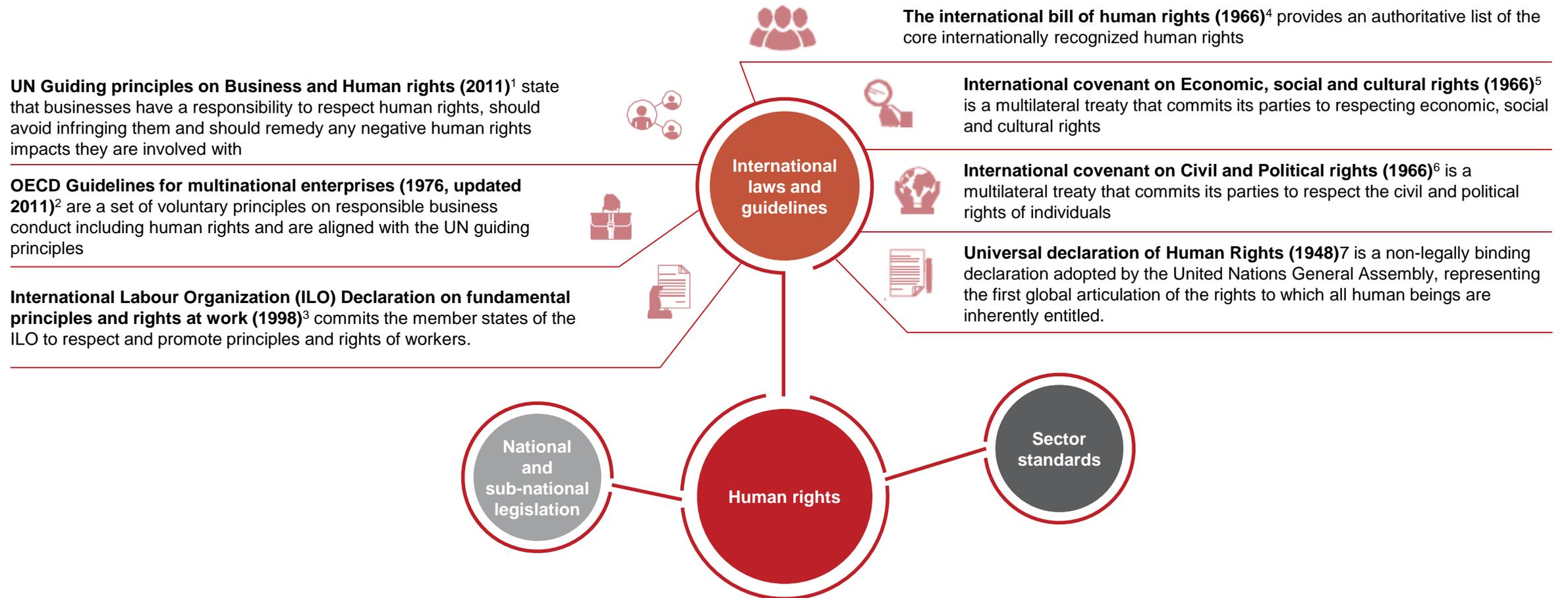


Main activities



¹ Please consider that the Group's indirect human rights risks are also monitored through to the human rights criteria included in the Responsible Underwriting Group Guideline (RUGG) and in the Responsible Investment Guideline (RIG).

Human Rights Due Diligence | Analysis of the context



1 UN Guiding Principles on Business and Human Rights (2011) [business-humanrights.org/en/un-guiding-principles](https://www.business-humanrights.org/en/un-guiding-principles)

2 OECD Guidelines for Multinational Enterprises (1976, updated 2011) www.oecd.org/investment/mne/48004323.pdf

3 International Labour Organization (ILO) Declaration on Fundamental Principles and Rights at Work (1998) www.ilo.org/declaration/lang--en/index.htm

4 The International Bill of Human Rights (1966) www.ohchr.org/Documents/Publications/Compilation1.1en.pdf

5 International Covenant on Economic, Social and Cultural Rights (1966) www.ohchr.org/EN/ProfessionalInterest/Pages/CESCR.aspx

6 International Covenant on Civil and Political Rights (1966) www.ohchr.org/EN/ProfessionalInterest/Pages/CCPR.aspx

7 Universal Declaration of Human Rights (1948) www.ohchr.org/EN/UDHR/Pages/UDHRIndex.aspx

Human Rights Due Diligence | Analysis of inherent risks of Human Rights violation

Generali's direct inherent risks

Country inherent risks

step A

Ranking taking into account the geopolitical, cultural and legislative conditions of Countries, assessed according to the potential occurrence of cases of Human Rights violation.

Business inherent risks

step B

Ranking taking into account the vulnerability of workers and the impact of non-compliance on working conditions *(for additional information please refer to slides 10-11)*

Business inherent risks

Activities performed to identify the Indirect Business risks:

1. Identification of the main sectors in which the Group carries out investment/insurance activities
2. Analysis of external sources to identify the main inherent risks

Human Rights inherent risks related to the main sectors where the Group carries out investments/insurance activities

List of the main Human Rights inherent risks linked to each of the main sectors in which the Group carries out investment/insurance activities

Activities performed to identify the list of the Countries at risk of violation of human rights:

1. Identification of the main Human Rights Country risks for the Countries where the Group operates *(for additional information please refer to slides 8-9)*
2. Analysis of Generali's presence in each Country (based on the number of employees)

Human Rights inherent risks index for each of the Countries where the Group operates

A matrix identifying the countries and/or activities Generali can consider at risk for each of the human rights analyzed

Activities performed to identify the Direct Business risks:

1. Analysis of the Group main businesses and activities, focusing on:
 - a. Insurance, banking, and investment
 - b. Real estate
 - c. Agriculture (Genagricola)
2. Analysis of external sources to identify the main inherent risks

Human Rights inherent risks related to each of the Generali's businesses

Overview

Activities

Outputs

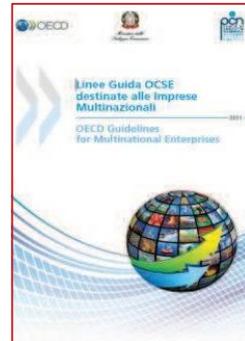
Annex

Analysis of the context | Main international documents on Human Rights (1/2)



Principles of the UN Global Compact

The set of fundamental principles, relating to human rights, standards work, environmental protection and the fight against corruption

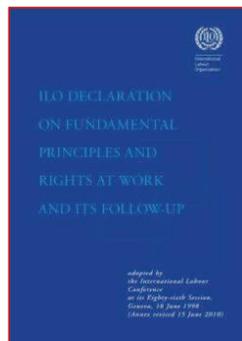


OECD Guidelines for Multinational Enterprises



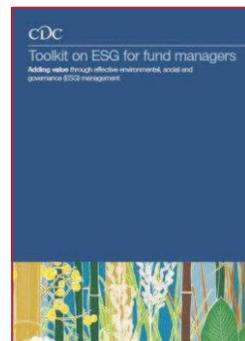
Responsible business conduct for institutional investors OECD

Key considerations for due diligence under the OECD Guidelines for Multinational Enterprises OECD



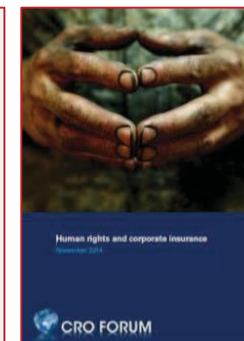
ILO Declaration on Fundamental Principles and Rights at Work

Declaration on the fundamental principles and rights of work, based on common values, and on a fair redistribution



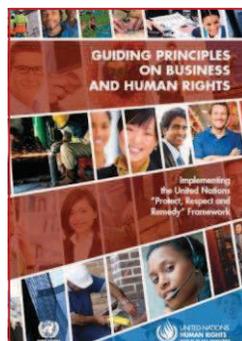
Toolkit on ESG for fund managers CDC

International tool for carrying out due diligence with reference to the main ESG issues



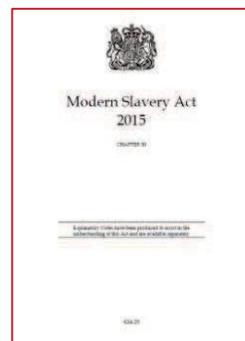
Human rights and corporate insurance CRO Forum

Document dedicated to human rights. It focuses on the core functions of the insurance industry, the transfer of risks and the investment of insurance premiums



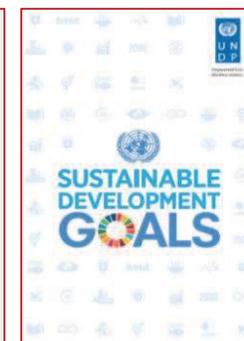
Guiding Principles on Business and Human Rights United Nations

Implementation of the United Nations "Protection, Respect and Remedy" framework - also known such as "Ruggie Framework - 31 principles "



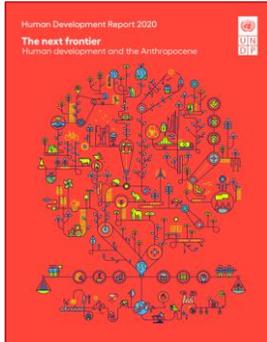
Modern Slavery Act Parliament of the United Kingdom

English law to address slavery and the slave trade in UK



Sustainable Development Goals United Nations Development Programme (UNDP)

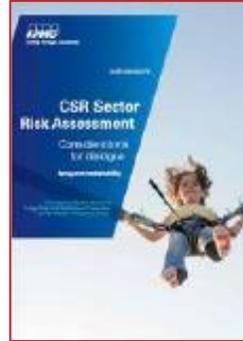
Analysis of the context | Main international documents on Human Rights (2/2)



Human Development Indices and Indicators

United Nations Development Programme (UNDP)

The document provides the main indices and rankings by country, referring to Human Rights



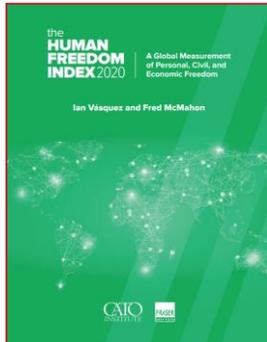
CSR Sector Risk Assessment

KPMG
The document provides information on key ESG risks for several sectors, useful in order to identify where the risk of Human Rights Violation is greatest



Data Protection Laws of the World

DLA Paper
Internationally recognized law firm providing an overview of key privacy and data protection laws and regulations in nearly 100 countries



The Human Freedom Index 2020 Cato Institute

Cato Institute is a public research policy organization, based in America that takes information from recognized international databases (e.g. UN Office on Drugs and Crime, Intentional Homicide database, OECD, Social Institutions and Gender Index) indicates the level of risk of violation of Human Rights for each country, explaining the individual risks)



Rights of the Child

Humanium
Humanium is an international NGO founded in Geneva, aimed at protecting children and dedicated to stopping the violations of children's rights around the world. It offers a constantly updated ranking at national level on respect for children's rights

Analysis of inherent risks of Human Rights violation | Main Country risks (1/2)

MAIN COUNTRY RISKS																
Human Development Index (longevity, education, income)	Gender Development Diversity Index (longevity, education, income)	Gender Inequality Index (Reproductive Health, Empowerment, Labour market)	Education (population with at least some secondary education)	Work and Employment				Children Rights Index	Freedom of Association	Security and Safety (Homicide; Disappearances, Conflict and Terrorism; Women's Security and Safety)	Personal Data Protection (Privacy)	Compliance with standards	Rule of Law	Religious Freedom	Expression & Information	Legal system and Property Rights
				Unemployment	Vulnerable employment	Employment-related social security: Mandatory paid maternity leave	Employment-related social security: Old-age pension recipients									

Index	Overview	References
Human Development Index	The HDI is used to indicate the lack of some essential elements for humans (such as a healthy and long-lived life, knowledge and a decent lifestyle). The index reflects the improvement / worsening of the living conditions of people in a given country and the national average progress. It consists of three components: longevity, education and income.	Human Development Report, Tab 1 Source: UNDESA, UNESCO, World Bank, Barro and Lee, IMF
Gender Development Diversity Index	Measures disparities on the Human Development Index (HDI) by gender. Contains information on longevity, education and income (including Estimated gross national income per capita).	Human Development Report, Tab 4 Source: UNDESA, UNESCO, World Bank, Barro and Lee, ILO, IMF
Gender Inequality Index	Measure gender inequality. Main components: reproductive health, empowerment and the labor market: <ul style="list-style-type: none"> Reproductive health is measured by two indicators: the relationship between maternal mortality and the adolescent birth rate; Empowerment is measured by the number of parliamentary seats held by women and by the shares of the population with at least one level of secondary education per sex; The labor market is measured by labor force participation by gender. 	Human Development Report, Tab 5 Source: UN Maternal Mortality Estimation Group, UNDESA, IPU, UNESCO, ILO
Education	Considers the standard education indicators, namely: adult and youth literacy rates and the share of the adult population with at least one level of secondary education.	Human Development Report, Tab 9 Source: UNESCO Institute for Statistics
Unemployment	Main components: employment and unemployment. In particular, the two of the key indicators relating to employment: the relationship between employment and population and the participation rate in the labor force.	Human Development Report, Tab 11 Source: ILO
Vulnerable employment	Main components: employment and unemployment. In particular, vulnerable employment and different forms of unemployment.	Human Development Report, Tab 11 Source: ILO
Employment-related social security: mandatory/paid maternity leave	Main components: employment and unemployment. In particular, paid days of maternity leave which reflect the security resulting from employment.	Human Development Report, Tab 11 Source: ILO
Employment-related social security: old-age pension recipients	Main components considered: employment and unemployment with particular reference to old-age pensions which reflect the security resulting from employment.	Human Development Report, Tab 11 Source: World Bank

Analysis of inherent risks of Human Rights violation | Main Country risks (2/2)

MAIN COUNTRY RISKS																
Human Development Index (longevity, education, income)	Gender Development Diversity Index (longevity, education, income)	Gender Inequality Index (Reproductive Health, Empowerment, Labour market)	Education (population with at least some secondary education)	Work and Employment				Children Rights Index	Freedom of Association	Security and Safety (Homicide; Disappearances, Conflict and Terrorism; Women's Security and Safety)	Personal Data Protection (Privacy)	Compliance with standards	Rule of Law	Religious Freedom	Expression & Information	Legal system and Property Rights
				Unemployment	Vulnerable employment	Employment-related social security: Mandatory paid maternity leave	Employment-related social security: Old-age pension recipients									

Indice	Overview	References
Children Rights Index	The index evaluates the level of protection of children's rights in the field of labor law (among these: Poverty, Indigenous children, infant mortality, Right to Education, Street children, Child labor, Domestic violence, Child abuse, etc.).	Humanium
Freedom of Association	Freedom of association includes both the right of the individual to join / leave groups voluntarily, and the right of the group to take collective action to pursue the interests of its members. It is considered a part of the right to liberty. The indicator takes into account "Freedom of Association Assembly and Demonstration, Freedom to Establish Organizations".	The Human Freedom Index <i>Source: French Ministry of the Economy, Institutional Profiles Database</i>
Security and Safety	The index refers to the right to life and safety from physical aggression of fundamental importance for freedom. In particular, the index considers: murder, disappearances, conflicts, terrorism, women's safety.	The Human Freedom Index <i>Source: UN Office on Drugs and Crime, CIRI Human Rights Data Project, Uppsala Conflict Data Program, Economist Intelligence Unit, University of Maryland, OECD</i>
Personal Data Protection	Index that evaluates, for each country, the protection of data protection and the completeness of the privacy legislation.	Data Protection Laws of the World
Compliance with International Standards	The index highlights the adherence of countries to the main conventions for the protection of human rights. In particular, the list of 11 conventions concerns: civil and political, social, economic and cultural rights, rights and freedoms linked to the elimination of all forms of race and gender, discrimination and violence, protection of children's rights, workers' rights migrants and people with disabilities. They also cover torture and other cruel, inhuman and degrading treatment, as well as protection from enforced disappearance.	Human Development Report Tab 15 <i>Source: UNOHCHR</i>
Rule of Law	Index that evaluates the safety of life. It is therefore also considered a measure of human freedom (and its protection from the violence of others), it allows the social order and the possibility for each to pursue their own personal aspirations.	The Human Freedom Index <i>Source: World Justice Project</i>
Religious freedom	Index that evaluates the freedom to establish and manage religious organizations, in particular violations of religious freedom characterized by harassment and physical hostility not only by governments but also by single individuals who are members of opposing religions. Finally, it measures restrictions on religion that are legal or regulatory in nature.	The Human Freedom Index <i>Source: World Justice Project</i>
Expression and Information	An index that measures a wide range of freedoms: freedom of personal expression, freedom of the press (including any pressure from governments to limit the ability of the media to operate), use of the Internet and its control by part of government agencies, the freedom of access to satellite TV (with access to TV and foreign newspapers).	The Human Freedom Index <i>Source: World Justice Project</i>
Legal System and Property Rights	Index that measures the level of protection of individuals and their property rights through indicators of the impartiality of the courts, the independence of the judiciary and the execution of contracts.	The Human Freedom Index <i>Source: World Justice Project</i>

Analysis of inherent risks of Human Rights violation | Business risks (1/2)

BUSINESS RISKS												
Labour and working conditions									Health and safety			
Forced or child labour	Minimum wages and working hours	Equal opportunities and non discrimination	Freedom of association and collective Bargaining	Migrant workers (reallocation, accomoda-tion.)	Land grabbing	Right to a clean, safe and healthy living environment	Right to access to natural resources	Supply Chain	Work safety risks	Hazardous material use at work	Exposure to noise	Security

Indice	Overview	Reference
Forced or child labour	Index that measures the level of risk of forced or child labor depending on the business.	<ul style="list-style-type: none"> Toolkit CDC - Appendix 2; KPMG CSR Sector Risk Assessment
Minimum wages and working hours	An index that measures the level of risk of violating the minimum wage and identifies excessive working hours depending on the business.	<ul style="list-style-type: none"> Toolkit CDC - Appendix 2; KPMG CSR Sector Risk Assessment
Equal opportunities and non discrimination	Index that measures the level of discrimination risk in the workplace depending on the business.	<ul style="list-style-type: none"> Toolkit CDC - Appendix 2; KPMG CSR Sector Risk Assessment
Freedom of association and collective bargaining	Index that measures the level of risk of non-representation of the workforce, the freedom of association and representation by trade unions depending on the business	<ul style="list-style-type: none"> Toolkit CDC - Appendix 2; KPMG CSR Sector Risk Assessment
Migrant workers (reallocation, accommodation)	Index that measures the risk of compulsory relocation (which could lead to an involuntary dismissal of the employee) and the risk of having an "accommodation" for prolonged periods of time that does not guarantee basic services during the stay and that turns out to be far from the family and from your community.	<ul style="list-style-type: none"> Toolkit CDC - Appendix 2; KPMG CSR Sector Risk Assessment
Land grabbing	Index that measures the deprivation of unused land by local communities for intensive use by companies or institutions.	<ul style="list-style-type: none"> Toolkit CDC - Appendix 2; KPMG CSR Sector Risk Assessment
Right to a clean, safe and healthy living environment	Index that measures the right of workers to live in healthy, safe and clean places during the working period and the relative duty on the part of the Companies to offer housing with these requirements.	<ul style="list-style-type: none"> Toolkit CDC - Appendix 2; KPMG CSR Sector Risk Assessment
Right to access to natural resources	Index that measures the right of local communities to access local natural resources, which could be coercively stolen by third parties for intensive use.	<ul style="list-style-type: none"> Toolkit CDC - Appendix 2; KPMG CSR Sector Risk Assessment
Supply chain	Index that measures the level of risk of violation of human rights in the activities carried out by all the actors in the supply chain for the respective workers involved.	<ul style="list-style-type: none"> Toolkit CDC - Appendix 2; KPMG CSR Sector Risk Assessment

Analysis of inherent risks of Human Rights violation | Business risks (2/2)

BUSINESS RISKS													
Labour and working conditions									Health and safety				
Forced or child labour	Minimum wages and working hours	Equal opportunities and nondiscrimination	Freedom of association and collective Bargaining	Migrant workers (reallocation, accomoda-tion.)	Land grabbing	Right to a clean, safe and healthy living environment	Right to access to natural resources	Supply Chain	Work safety risks	Hazardous material use at work	Exposure to noise	Security	

Indice	Overview	Reference
Work safety risks	Index that measures the risks in the workplace on the basis of the tools and / or machinery used in company processes and the related tools for preventing potential accidents at work.	<ul style="list-style-type: none"> Toolkit CDC - Appendix 2; KPMG CSR Sector Risk Assessment
Hazardous material use at work	Index that measures the risks on work logoss on the basis of the materials used by workers that can be harmful, radioactive, carcinogenic to workers' health.	<ul style="list-style-type: none"> Toolkit CDC - Appendix 2; KPMG CSR Sector Risk Assessment
Exposure to noise	Index that measures the risks on work logoss considering the noise pollution that can damage the health of workers.	<ul style="list-style-type: none"> Toolkit CDC - Appendix 2; KPMG CSR Sector Risk Assessment
Security	Index that measures the right to protect and guarantee the safety of workers by the Company that operates in particularly strategic businesses and therefore subject to major criminal events and for terrorist purposes. It also assesses that the use of these safety tools does not affect the workers themselves.	<ul style="list-style-type: none"> Toolkit CDC - Appendix 2; KPMG CSR Sector Risk Assessment