



Europ Assistance Italia S.p.A.



POLICY FOR THE ENVIRONMENT AND CLIMATE

Chief Sales and Marketing Officer – Brand, Communication and Social Responsibility

POLICY

Ad esclusivo uso interno

Informazioni di sintesi del Documento

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Classificazione GIRS	Local Policy		
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Funzione Responsabile	CSMO – Brand, Communication and Social Responsibility		
Key contact	Chiara.giglio@europassistance.it		

Versione

Versione	Data di emissione	Protocollo	Modifiche	Owner
1	2018-09-19	EAI_P_09_2018		Brand, Communication and Social Responsibility

Aree/Funzioni interessate

- Brand, Communication and Social Responsibility
- EAI

Temi principali

<ul style="list-style-type: none">•	<p>The document reiterates the commitment of Generali in safeguarding the environment, as stated in the Code of Conduct, and includes the guiding principles by which the strategies and goals of Group companies' environmental management must abide, in order to ensure::;</p> <ul style="list-style-type: none">• protection of the environment• prevention of pollution• protection and conservation of biodiversity• appropriate response to the challenges posed by climate change.
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Principali norme interne correlate

- Code of Conduct
-

Eventuali norme interne abrogate/aggiornate

- N/A

Ragioni dell'emissione

Regolamentare **Altro**

Rilevante ai fini D.Lgs. 231/01

Processi aziendali impattati

<ul style="list-style-type: none">••	Corporate Social Responsibility
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Allegati

N/A

INTRODUCTION

The Generali Group, international leader in the insurance and financial world, wishes to take up an active role in creating a sustainable future by pursuing a goal of economic development that will lead to continuous improvement both of its business results and of the economic, social and environmental conditions of the communities in which it operates.

The Group's Code of Conduct explicitly calls for economic and social development to be based not only on respect for fundamental human rights and labour rights, but also on environmental protection, to which the Group contributes by promoting the reduction of direct environmental impacts arising from its operating activities and of indirect impacts associated with the value chain.

Generali is aware of the impacts that arise from company activities and of the role the Group can have in the diffusion of virtuous conduct, promoting the culture of sustainability in all its spheres of influence, particularly among employees, clients, suppliers and companies issuing financial instruments.

The Group is also aware that climate change constitutes an environmental, social and economic threat at the global level and that an engagement by all to reduce emissions of greenhouse gases resulting from human activities is necessary.

AIM AND SCOPE

The Policy for the Environment and Climate identifies the guiding principles by which the strategies and goals of Group companies' environmental management must abide in order to ensure protection of the environment, prevention of pollution and protection and conservation of biodiversity, as well as to meet the challenges posed by climate change.

The goal is to provide a framework for the management of environmental impacts in order to improve the Group's sustainability and take into account risks and opportunities that may have a significant bearing on the development of its core business and its ability to create long-term value. The tool through which the Group manages environmental impacts, giving effect to the Policy, is the Environmental Management System.

The Policy for the Environment and Climate covers all activities carried out by the Group's companies in all the various countries where the Group operates.

PRINCIPLES

The basic principles of the Policy are inspired by those expressed in the United Nations Global Compact for environmental protection, designed to:

- support a precautionary approach to environmental challenges through systemic management directed at ensuring compliance with regulations and prevention of environmental hazards;
- promote environmental responsibility and greater awareness of environmental issues on the part both of employees and of clients and the public at large, through programmes and initiatives for their active involvement on a path oriented towards continuous improvement and creation of shared value;
- encourage the development and diffusion of environmentally friendly technologies, capable of supporting efficient management of energy and water resources and protection of biodiversity, amounting to effective measures of mitigation and adaptation to climate change.

MAIN AREAS OF INTERVENTION

In order to make the Policy operational and pursue continuous improvement of environmental performances, so contributing to the fight against climate change caused by greenhouse gas emissions, the Generali Group has identified the following areas of intervention for which specific indicators, and respective targets, have been selected.

1. Reduction of its own business's environmental impacts

- Optimization of consumption of natural resources to reduce impacts related to energy, paper and water use, waste production and corporate mobility, also with recourse to utilization of low carbon products and services.
- Periodic monitoring of environmental performances and, in particular, of reduction of greenhouse gas emissions in order to assess the Group's progress on its path oriented towards continuous improvement.
- Raising employees' awareness, through information and specific training programmes that motivate them to become actively involved and the determining of environmental responsibilities.

2. Integration of environmental and climate aspects in investment strategies

- Promotion of energy innovation through investments in renewable energy resources and in greater energy-efficiency of buildings, including those held for investment.
- Adoption of responsible investment policies that also include environmental requisites, apt to affect the behavior of issuing companies.

3. Promoting and increasing awareness of environmental and climate risks

- Integration of environmental criteria in the risks assessment methodologies to offer insurance and investment products promoting eco-friendly conduct among clients.
- Involvement of the Group's contractual partners so that they too, in their business, commit themselves to safeguarding the environment, respecting the Ethical Code for Suppliers of the Generali Group.
- Fostering a process of cultural innovation in the community geared towards environmental sustainability and the prevention of extreme events and natural disasters.

4. Engagement in climate policy

- Support for research to improve the analysis and management of climate change-related risks by means of new actuarial models.
- Dialogue and collaboration with governments and national and international associations to determine and adopt policies and strategies to fight against climate change and increase the resilience of cities and regions, particularly with regard to damage caused by meteorological events of catastrophic import.

5. Disclosure and transparency

- Commitment to convey transparently to its stakeholders the strategies and the results achieved in the environmental field, and in the fight against climate change.

ADOPTION AND DISSEMINATION

The Group Policy for the Environment and Climate replaces the previous Environmental Policy of the Generali Group. It has been approved by the Board of Directors of Assicurazioni Generali S.p.A. and adopted by all Group companies. The Group CEO is responsible for its implementation.

In order to ensure its easy accessibility and availability to the public, the Policy for the Environment and Climate is published on the institutional website www.generali.com and on that of each Group company.

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1 Roles and Responsibilities

Role	Level	Responsibility
BoD	Group	<ul style="list-style-type: none"> • I approves the Group Policy for the Environment and Climate and any subsequent changes
RCC	Group	<ul style="list-style-type: none"> • It is responsible for Policy assessment before the approval by th BoD
Supervisory, Administrative and Management Bodies of Legal Entities		<ul style="list-style-type: none"> • They approve the Policy and any subsequent change at local level
Group CEO	Group	<ul style="list-style-type: none"> • He submits the Policy to th BoD for approval and is responsible for its implementation
Local CEOs (CEO of each Group Legal Entity)	Group	<ul style="list-style-type: none"> • They submit the Policy to the Administrative Management and Supervisory Bodies for approval; • They ensure Policy implementation in the individual companies; • They are responsible for distributing the Policy to the individual companies
EMS Review Committee	Group	<ul style="list-style-type: none"> • It reviews and proposes possible changes to the Policy on an annual basis during the EMS review
Group EMS Representative	Group	<ul style="list-style-type: none"> • He/she is responsible for defining specific introductory training programs about the policy
CSR Officer/EMS Representative	Local	<ul style="list-style-type: none"> • He/she support the Local CEO in carrying out all the activities related to the implementation of the Policy; • He/she is responsible for overseeing the approval and implementation process of the Policy.
Group Communications & Public Affairs	Group	<ul style="list-style-type: none"> • Through the GSR unit, t draws the Group Policy for the Environment and Climate • Through the Group Employees Communication, it support the Functional Governance and Internal Regulations in publishing the Policy on the Group Portal; • Through the Group Media & Web Communications, it publishes the Policy on the Group institutional website
Functional Governance Group and Internal Regulations	Group	<ul style="list-style-type: none"> • It publishes the Policy on the Portal Group; • It notifies the publication of the Policy to the Country Managers/Regional/Divisional Officers, to the Local CEOs and to the CSR Officers/EMS Representatives; • It ensures that a monitoring process is established
Group Compliance/Audit	Group	<ul style="list-style-type: none"> • It controls the actual implementation if the Policy
GSR Unit	Group	<ul style="list-style-type: none"> • IT draws up the Policy on behalf of the Group Communications & Public Affairs; It supports the Group Communications & Public Affairs function and the Group EMS Representative in his /her tasks.

2 Aim

The aim of this procedure is to outline the management guidelines of the Group Policy for the Environment and Climate and the relevant responsibilities. The Policy was drawn up to define the guiding principles by which strategies and objectives for the environmental management of the Group companies must abide, with a view to ensuring the environmental protection, pollution prevention, biodiversity protection and conservation and to respond to the challenges posed by the climate change.

3 Scope

This procedure refers specifically to the document entitled Group Policy for the Environment and Climate and applies to all the Group companies, which undertake to comply with and act in accordance to its provisions within six months from the approval of the Policy by the relevant Supervisory, administrative and Management Bodies.

4 References

The Local CFO is responsible for ensuring that a process for the valuation of assets and liabilities other than technical provisions is established.

The process shall comply with the provisions of this Policy and the Manuals and include, as a minimum, a clear definition of:

- ISO 14001 standard;
- Group Policy for the Environment and Climate;
- Organisational Structure of the Group Environmental Management System

5 Definitions and Abbreviations

- Group: Generali Group
- BoD: Board of Directors of Assicurazioni Generali S.p.A.
- RCC: risk and Control Committee of Assicurazioni Generali S.p.A.
- GHO: Group Head Office
- GSR: Group Social Responsibility
- EMA: Environmental Management System
- Policy: Group Policy for the Environment and Climate
- ISO 14001: standard issued by ISO (International Organization for Standardization), which establishes requirements for implementing an Environmental Management System.

6 Management Guidelines

6.1 DRAWING UP

The Group Policy for the Environment and Climate is a document outlining the guiding principles and areas of intervention to define strategies and objectives, with a view to continuously improving environmental performance and contributing to the fight against climate change caused by greenhouse gases emissions.

Through the GSR unit, the Group Communications & Public Affairs function draws up the Group Policy for the Environment and Climate in compliance with ISO 14001 requirements, in accordance with the prioritise and guidelines defined by the BoD. In doing so, it takes the following into account:

- Results of the environmental analysis performed every three years;

- Commitment to continuous improvement of environmental performance, reduction of greenhouse gases emissions and pollution prevention;
- Compliance with legislative and regulatory requirements, and with the principles of initiatives joined by the Group on a voluntary basis;
- The stakeholders 'point of view.

6.2 APPROVAL AND IMPLEMENTATION

The Head of Group Communications & Public Affairs function submits the Group Policy for the Environment and Climate to the Group CEO.

The Group CEO submits the Policy to the BoD for approval following an assessment by the RCC, which performs consultative, recommendatory and preparatory functions on social and environmental sustainability issues.

The Group CEO is responsible for Policy implementation, so that its principles can be implemented in the corporate business.

6.3 COMMUNICATION

The Group Policy for the Environment and Climate shall be distributed and disclosed inside and outside the Group companies. Disclosure aims at providing knowledge of the principles and commitments undertaken by the Group in the environmental field.

To this end, after approval by the BoD, the Functional Governance and Internal Regulations, supported by the Group Employee Communication function, shall publish the Policy on the Group portal (We Generali Portal), which is the official communication tool used inside the Group, as well as, on the Group institutional website www.generali.com under the "Sustainability" section, through the Group Media & Web Communications function, so as to provide communication outside.

Following the publication on We Generali Portal, Functional Governance and Internal Regulations function notifies the publication of the Policy to the Country Managers/Regional/Divisional Officers (hereinafter Head of Business Unit), to the Local CEOs and to the Head of the relevant functions at a Country level (CSR Officers/EMS Representatives).

6.4 LOCAL APPROVAL AND IMPLEMENTATION

The Group Communications & Public Affairs function is in charge of boosting the implementation of the Group Policy for the Environment and Climate at a local level.

Each Business Unit lists the Legal Entities within the scope of the Policy controls its effective transposition and forwards the abovementioned list to GSR unit of the Group Communications & Public Affairs function.

The publication of the Policy within the Group Portal gives rise to the obligation for the Local CEOs of the Legal Entities to submit them for approval to the relevant Supervisory, Administrative and Management bodies and to guarantee its implementation. The approval process shall take into consideration any waiver that may be introduced.

CRS Officers or EMS Representatives shall support the Local CEO in carrying out all the activities related to the implementation of the Policy.

Local CEOs Officers/EMS Representatives are responsible for overseeing the overall approval and implementation process of the Policy.

6.5 LOCAL COMMUNICATION

In order to ensure easy access to the public, the Local CEOs are responsible for distributing it in the local language and for updating all the relevant documents containing any reference to it, such as the Code of Conduct and the Ethical Code for Suppliers.

The document can be distributed by the Group companies through the following communication channels:

- corporate intranets;
- internet websites
- publication in magazines or periodicals;
- e-mail;
- newsletters;
- press release.

The distribution of the Group Policy for the Environment and Climate among should preferably be done through dedicated portal or in electronic form; moreover, explicit reference to the Policy must be made in supply contracts, to ensure compliance by the supply chain where necessary.

6.6 MONITORING

Once approved at a local level, the CSR Officers/EMS Representatives submit a formal acknowledgment fo Functional Governance and Internal Regulations, which confirms the approval of the Policy (i.e. Board of Directors resolution, etc..) and its distribution.

Functional Governance and Internal Regulations ensures that a monitoring process is established with reference to:

- the approval of the Policy throughout the Group;
- the updating of the versions of the Policy.

In case of any delay or issue arising, Functional Governance and Internal Regulations alerts the GSR unit in order to boots the implementation is controlled by Group Compliance and Group Audit in line with the respective mandates.

6.7 TRAINING

The Group EMS Representative, in collaboration with the competent functions, is responsible for defining specific introductory training programs for the Policy to be understood and implemented by all Group employees.

6.8 REVIEW

The Group Policy for the Environment and Climate must be reviewed every year by the EMS Review Committee, i.e. the body tasked with conducting the review of the EMS, in order to assess its suitability, adequacy and effectiveness in view of its continuous improvement.

Following such a review, any changes to the document must be submitted to the BoD for approval, prior to RCC assessment. The document shall be update with the new date and distributed inside and outside the Group.

Chairman of EMS Review Committee
(Group Director of Communication & Public Affairs)
Simone Bemporad

