



GROUP PROCEDURE FOR ENVIRONMENTAL POLICY MANAGEMENT

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1.0 AIM

The aim of this procedure is to outline the management guidelines of Generali Group Environmental Policy.

2.0 SCOPE

This management procedure focuses on the Environmental Policy document and is applied to all the Group companies.

3.0 REFERENCES

- UNI EN ISO 14001 standard
- Generali Group Environmental Policy

4.0 DEFINITIONS AND ABBREVIATIONS

GROUP: Generali Group

Parent Company: Assicurazioni Generali S.p.A.

GM: General Manager of Assicurazioni Generali S.p.A. who is responsible for Corporate Social Responsibility

BoD: Board of Directors of Assicurazioni Generali S.p.A.

CSR: Corporate Social Responsibility and Group Sustainability Report

EMSC: Environmental Management System Committee

SC: Sustainability Committee

CSR Committees: Corporate Social Responsibility Committees

5.0 MANAGEMENT GUIDELINES

5.1 Drawing up

The Environmental Policy is a document outlining the objectives and commitments guiding the Group's choices and actions in environmental management and, therefore, in the Environmental Management System planning and implementation.

By assessing the environmental aspects of Group's activities, the SC sets priorities and general guidelines to identify the Environmental Policy. In doing so, it takes the following into account:

- the Group mission and guiding values;
- the stakeholders' points of view;
- commitment to continuous improvement;
- pollution and climate change prevention;
- alignment with other Group policies;
- compliance with legislative and regulatory requirements, as well as with the principles of initiatives joined by the Group on a voluntary basis.

In compliance with the requirements of UNI EN ISO 14001 standard, the Group Environmental Policy must be:

- documented and circulated to all the staff members;
- available to the public;
- implemented and maintained.

5.2 Approval

The Group Environmental Policy is approved by the BoD.



5.3 Circulation

The Group Environmental Policy document must be circulated in the local language inside and outside the Group companies. In particular, internal communication is vital to promote knowledge of the environmental commitments undertaken by the Group and involvement of all the staff members and the sales forces in the pursuit of its objectives.

To this aim, the document can be circulated in the Group through the following communication channels:

for staff members and sales forces:

- corporate intranets;
- HR portals;
- e-mail;
- newsletters;
- posting in notice boards and meeting places;
- distribution during meetings;

for the wider public:

- publication on the Group's website www.generali.com under the "Sustainability" section for e-consultation and download;
- publication on the websites of the Group companies in the different countries;
- distribution to Group's agencies and bank counters;
- distribution during meetings and awareness-raising activities targeting the wider public;
- publication in the Group's magazines or newsletters;
- press releases

The Environmental Policy document can be circulated among suppliers through delivery or any other form of direct communication. Explicit reference to the Environmental Policy must be made in procurement contracts, as to ensure the compliance in the procurement chain.

The EMSC is responsible for circulating the Environmental Policy inside and outside the Group with the support of the CSR and the relevant corporate departments.



5.4 Review

The Generali Group Environmental Policy document is regularly amended after the review made by the SC supported by the CSR, whose aim is to assess the efficiency and effectiveness of the Environmental Management System in view of its continuous improvement. Following such a review, changes to the document may be submitted to the BoD for consideration and approval. The document is then updated with the new date.

5.5 Implementation in Generali Group companies

The Generali Group Environmental Policy is a guiding tool for the Group companies which - in line with national practices, cultures and resources - implement it and commit themselves to achieving its objectives. To this purpose, CSR Committees have to identify local targets and actions in specific environmental programmes.



6.0 ROLES AND ACTIONS

Roles	Actions
SC	a. It draws up the Group Environmental Policy document; b. it reviews and tables changes to the Group Environmental Policy; c. it submits the Group Environmental Policy to the BoD for approval.
BoD	It approves the Group Environmental Policy and the relevant changes submitted by the SC.
EMSC	It collaborates with the relevant corporate departments to: a. ensure the circulation of the Group Environmental Policy within the Group; b. support the circulation of the Environmental Policy inside and outside the Group through the promotion of specific trainings, public workshops and other means; c. ensure visibility of the Environmental Policy on institutional websites and other public information channels.
CSR	It supports the SC, the EMSC and CSR Committees in their tasks.
CSR Committees	a. They coordinate activities in their countries to promote the dissemination and adoption of the Group Environmental Policy; b. in the countries where they operate, they identify responsibilities, actions and specific targets for the implementation of objectives and compliance with the commitments outlined in the Group Environmental Policy.
Group staff members	They are informed about the Group Environmental Policy and, in particular, about the commitments and objectives they might be concerned with.