

# Human Rights Guidelines



## **HUMAN RIGHTS GUIDELINES**

Bologna, 29 June 2023

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## 1. Introduction

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

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

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

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

### 1.1. Document Objectives

The Human Rights Guidelines (the 'Guidelines'), which are annexed to and form an integral part of the Sustainability Policy, are part of the strategic approach to Sustainability that the Unipol Group adopts and which is articulated in a plurality of policies and commitments<sup>1</sup>.

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

### 1.2. Approval and revision of Guidelines

The Guidelines, drafted and revised with the involvement of all the company structures concerned in order to ensure a clear definition and sharing of objectives, roles and responsibilities, are approved by the Board of Directors of Unipol Group S.p.A. ("Unipol" or the "Parent Company"), in exercising its management and coordination activities with respect to the Subsidiaries and in line with the Group's business process on the preparation and validation of corporate policies.

Subsequently, the Boards of Directors of the Companies falling within the scope of application set forth in the paragraph "Scope of application", as part of their responsibilities for governance, internal control system and risk management, evaluate and approve the Guidelines, as far as applicable, in accordance with the specific industry regulations and business model.

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<sup>1</sup> <https://www.unipol.it/en/sustainability/reporting-performance-and-communication/library>

The Guidelines are communicated and made available by the perimeter companies to all relevant personnel through appropriate communication channels and are made available on the Group's website to all stakeholders, including employees, suppliers and partners, so that there is full awareness and further impetus to promote human rights as an integral part of the Group's value system.

The Guidelines will be reviewed and - if necessary - amended whenever evidence emerges from the internal evaluation process and from the monitoring of national and international trends in the protection and promotion of fundamental rights, as well as needs for regulatory updates, interventions by the Supervisory Authorities, *business* strategies or changes in the context require it, and, in any case, at least annually.

## 2. Context and principles

### 2.1. Guiding Principles

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

- the Universal Declaration of Human Rights and subsequent international conventions on civil and political rights and on economic, social and cultural rights;
- the UN Conventions on the Rights of Women, on the Elimination of All Forms of Racial Discrimination, on the Rights of the Child, and on the Rights of Persons with Disabilities;
- the Declaration on Fundamental Principles and Rights at Work and the eight Core Conventions of the International Labour Organisation (ILO);
- the United Nations Guiding Principles on Business and Human Rights ('Ruggie Principles');
- the OECD Guidelines for Multinational Enterprises;
- the United Nations 2030 Agenda for Sustainable Development.

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

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

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

For each of these initiatives, specific targets and updates on the fulfilment of commitments are available at [www.unipol.it](http://www.unipol.it).

## 2.2. Scope of application

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

## 2.3. Definitions and terminology

Agenda 2030	The Agenda 2030 is the new global reference framework for national and international efforts to find common solutions to the planet's biggest challenges.
Materiality Analysis	The process whereby the sustainability topics representing the most significant ESG Risks and Opportunities as well as Impacts on ESG Factors for the organisation are identified.
Human Rights	Human rights are universal and are recognised to all human beings indiscriminately. In the Universal Declaration of Human Rights (the 'Declaration'), an international minimum standard for the protection of individual rights and freedoms is established. The nature of these fundamental provisions is such that they are now widely regarded as the basis of international law. The Declaration affirms the concept of equality, the right to life, liberty and security of one's person. It also regulates matters relating to the individual's right to respect for his or her private life and proclaims the right to social and economic security, as well as the social and cultural rights indispensable to his or her dignity and the free development of his or her personality.
Due diligence	In the context of the Ruggie Principles, this term refers to an ongoing management system that a company puts in place in consideration of, <i>inter alia</i> , the sector in which it operates, the operating contexts, the size of the company, to ensure that it respects human rights or is not complicit in human rights abuses. This involves 'identifying, preventing, mitigating and reporting' negative effects potentially caused by the company.

ESG Factors	Environmental, social and <i>governance</i> impact issues considered "material" for the Group and for reference <i>stakeholders</i> , according to the definition in the Materiality Analysis.
Impacts or Impacts on Human Rights factors	The effects (including negative) that a company has or could have on human rights, as a result of the company's activities or business relations.
United Nations Ruggie Principles	The Guiding Principles on Business and Human Rights, which contain three pillars: protect, respect and remedy. Each defines concrete and actionable steps for governments and companies to fulfil their respective duties and responsibilities to prevent human rights abuses in business operations and provide remedies if such abuses occur.
OECD Guidelines for Multinational Enterprises	Recommendations addressed by the governments of the 37 OECD member states to companies operating in their national territory, containing "non-binding principles and standards for responsible business conduct, compliant with the applicable laws". On 25 May 2011, in Paris, the ministerial conference of the OECD approved an updated version of these guidelines, issued for the first time in 1976.
OECD Due Diligence Guidance for Responsible Business Conduct	Guide aiming to offer businesses practical support for the implementation of the OECD Guidelines for Multinational Enterprises.
ESG Risks or Sustainability Risks	Uncertain environmental, social or <i>governance</i> events or conditions which, should they occur, could cause a potential relevant negative effect on the <i>business</i> model, strategy and sustainability strategy of the company and its capacity to reach the objectives and goals established and create value.
Supplier ESG management system	Management model used to increase the awareness of Group suppliers of the ESG impacts of their activities, as well as to evaluate their compliance with the UNGC requirements (this evaluation also takes place through the Suppliers Code of Conduct for responsible procurement, based on the UNGC principles and Standard ISO20400 <sup>2</sup> ).
UNEP FI Principles of Sustainable Insurance	United Nations initiative with a view to integrating environmental, social and governance risks and opportunities within the insurance sector (from which the development of the 4 relative principles derives).

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

<i>United Nations Global Compact (UNGC)</i>	<p>UN initiative which aims to promote the culture of corporate social responsibility through the sharing, implementation and dissemination of common principles and values.</p> <p>This initiative gave rise to the 10 universal principles structured into 4 areas:</p> <p><b>Human Rights</b></p> <p>Businesses should support and respect the protection of internationally proclaimed human rights within their respective spheres of influence.</p> <p>II. Businesses should make sure they are not complicit in human rights abuses, including indirectly. Human rights are universal and are recognised to all human beings indiscriminately.</p> <p><b>Work</b></p> <p>III. Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining.</p> <p>IV. Businesses should uphold the elimination of all forms of forced and compulsory labour.</p> <p>V. Businesses should uphold the effective abolition of child labour.</p> <p>VI. Businesses should uphold the elimination of discrimination in respect of employment and occupation.</p> <p><b>Environment</b></p> <p>VII. Businesses should support a precautionary approach to environmental challenges.</p> <p>VIII. Businesses should undertake initiatives to promote greater environmental responsibility.</p> <p>IX. Businesses should encourage the development and diffusion of environmentally friendly technologies.</p> <p><b>Anti-corruption</b></p>
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	X. Businesses should work against corruption in all its forms, including extortion and bribery.
Unipol Group and Group	Unipol Group S.p.A. and its subsidiaries.

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

Impacts on the Group's Human Rights can be negative, such as the exploitation of workers, and be generated either through direct actions or through behaviour adopted by parties within the Group's spheres of influence and empowerment (such as supply chain, investment issuers and customers); or positive, such as the provision of innovative services that enable or facilitate people to exercise their rights (e.g. access to health).

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

### 4. Identifying and Assessing Impacts on Human Rights

The Unipol Group, in accordance with its Sustainability Policy, integrates human rights into its Group risk management model.

Risks related to the determination of negative Impacts on Human Rights, together with other ESG risks, are integrated within the Risk Management System adopted by the Group and included in the taxonomy of risks common to the entire Group, defined by the Risk Management Policy.

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

In fact, in the Group's risk management model, based on commitments made through the Specific Risk Management Policies, **assessment procedures** are established that make it possible to systematically identify and analyse the risk of generating potential negative Human Rights Impacts within the Group and its spheres of influence and empowerment. Internally and along its value chain, the Group uses various analysis and listening tools (*whistleblowing*, reports made to the Ethics Officer, trade union communications, *data-driven* analysis systems) and involves multiple actors (including: rights holders; actors within its spheres of influence, such as suppliers, investees, customers; credible, independent and competent external information sources; ESG data and information providers) with whom it works

to identify potential human rights violations linked directly to its activities or indirectly through its spheres of influence.

The evaluation is intended to determine:

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

This process also allows the early identification of negative impacts actually generated on which a root cause assessment is carried out to avoid the recurrence of events with the same cause.

Through these assessments, the Unipol Group then identifies priorities for action in terms of preventing and mitigating negative impacts on Human Rights that may be related to its operations and its products and services, depending on the severity and likelihood of the negative impact.

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

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

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

## 5. Prevention and Mitigation of Negative Impacts on Human Rights

### 5.1. Direct impacts

#### Employees

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

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

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

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

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- Guidelines on human resource management and organisation;
  - Internal arrangement on workers' health and safety management system;
  - Operational rule on the selection of external non-managerial personnel for Group Companies;
  - Data Protection Policy;
  - Code of Good Practice;
  - = Guidelines on anti-corruption;
  - National Collective Agreements and Corporate Supplementary Agreements.

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

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

To further implement the proactive model of dialogue with workers and trade unions, the Group has set up four bilateral committees, which are responsible for assessing and co-determining initiatives on: Vocational training, Equal opportunities, Health (with a focus on integrative health care) and Mobbing risk prevention.

Within this model, the Group's approach is evolving in order to offer welfare adapted to the specific needs of different types of workers, with the aim of improving the quality and productivity of work and the well-being of all employees; in order to maintain a broad and up-to-date vision on the subject, Unipol Group participates in communities promoted at government level.

The Group recognises the development of employees' skills and talents as a central element of growth for people and the organisation. To this end, it defines paths aimed at accompanying their professional growth, with a specific focus on induction and coaching in the internal paths of younger generations.

## **Customers**

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

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

- Policy on the protection and use of personal data and further internal regulations on the subject;

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- Complaint handling policy;
  - Guidelines for advertising/communication relating to UnipolSai Assicurazioni's insurance products and supplementary pension schemes;
  - Operational Rule on Reputational Risk Monitoring and Proactive Reputation Management.

### **Agents, intermediaries and collaborators**

Without prejudice to the specific nature of the relations and relationships with agents, intermediaries and collaborators, the Unipol Group adopts towards them the same conduct as it does towards its own employees.

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

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

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

### **5.2. Indirect impacts**

#### **Customers**

As an adherent of the UNEP FI Principles for Sustainable Insurance (PSI), the Group is committed to raising customers' awareness of environmental, social and governance issues, to manage risks and develop appropriate solutions, with a particular focus on not entering into contractual relationships with parties that operate under conditions that: violate human and labour rights; exploit natural resources without due consideration for their environmental impacts; systematically use corruption and illegal practices in business management.

To this end, the Parent Company has defined 'Guidelines for Non-Life Business' and 'Life Business' underwriting activities with reference to environmental, social and governance factors, through which it also oversees potential negative impacts generated by customers, including those related to the non-respect of Human Rights, which have been implemented by the Group Companies concerned. In addition, with reference to the provision of payment services and the issuance of electronic money, safeguards have been defined to prevent the establishment of relations and exclude transactional movements with persons carrying out activities that generate significant impacts on Human Rights (e.g. arms trade, drug trafficking, illegal pornography, trafficking in human beings, etc.).

#### **Investments**

The Unipol Board of Directors has defined 'Guidelines for Responsible Investment Activities' for the Group, which support the identification and management of Sustainability Risks and Negative

Sustainability Effects in the investment decision-making process. In this area, safeguards related to respect for Human Rights have been defined.

### **Agents**

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

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

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

### **Suppliers and Business Partners**

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

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

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

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

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

## 6. Roles and responsibilities of the players involved

### 6.1. Board of Directors

The Parent Company's Board of Directors, also in exercising its management and coordination activities with regard to the companies in scope:

- approves - after examination by the Nomination, Governance and Sustainability Committee - the Guidelines and their subsequent amendments;
- defines the model for identifying, assessing and managing the main ESG risks and negative impacts, including those related to Human Rights;
- guarantees the consistency of the content of the Guidelines with the provisions contained in the other internal regulation documents;
- approves - with the support of the Nomination, Governance and Sustainability Committee, to the extent of its competence - the reporting on the results achieved in the protection of Human Rights contained in Unipol's Non-Financial Declaration.

The Board of Directors of UnipolSai:

- approves - after examination by the Nomination, Governance and Sustainability Committee - the Guidelines and their subsequent amendments;
- guarantees the consistency of the content of the Guidelines with the provisions contained in the other internal regulation documents.

The Boards of Directors of the Companies in scope:

- approve the Guidelines-as applicable, in accordance with specific industry regulations and the business model-and its subsequent amendments;
- guarantees the consistency of the content of this Policy with the provisions contained in the other internal regulation documents.

### 6.2. Nomination, Governance and Sustainability Committee

The Nomination, Governance and Sustainability Committee of the Parent Company performs proactive, advisory, preliminary and support functions to the Board of Directors on issues related to Human Rights and their impact on business strategy, as well as on the definition of commitments and monitoring of the Indicators, to the extent specifically relevant to the Guidelines. The Nomination, Governance and Sustainability Committee of the parent company examines proposals on the Guidelines and subsequent amendments.

### 6.3. Sustainability Department of the Parent Company

The *Sustainability* Function of the Parent Company is responsible for the adequacy and completeness of the Guidelines; for this purpose:

- it coordinates the due diligence process, with the support of the *Compliance and Anti-Money Laundering* and Audit Functions, as well as the Parent Company *Risk Area* for the aspects falling within their respective competences;
- it evaluates the adequacy and effectiveness of the improvement actions taken and shares the commitments made in the Guidelines with the heads of the various departments involved;
- it prepares reports on the results obtained in the application of the Guidelines, conveyed through the various tools and channels provided for communication on the subject.

#### **6.4. The *Insurance* Area of the Parent Company**

The Parent Company's *Insurance* Area takes actions to support the implementation of the Guidelines, as well as the guidelines for managing specific risks, including Human Rights issues, in underwriting activities.

#### **6.5. The *Investment* Area of the Parent Company**

The Parent Company's *Investment* Area takes actions to support the implementation of the Guidelines, as well as the guidelines for managing specific risks, including Human Rights issues, in financial and real estate investment activities.

#### **6.6. The *Financial* Area of the Parent Company**

The Parent Company's *Financial* Area takes actions to support the implementation of the Guidelines, as well as the guidelines for managing specific risks, including Human Rights issues, in the activities of presiding over the supply chain.

#### **6.7. The *Human Resources and Organisation* Area of the Parent Company**

The Parent Company's *Human Resources and Organization* Area ensures the implementation of the commitments contained in the Guidelines regarding worker protection and equal opportunity, consistent with the internal regulatory system and contractual agreements insisting on the matter.

### **7. Reporting**

The results achieved in the protection of Human Rights in terms of risks and impacts identified, assessment activities and prevention and mitigation actions, and monitoring methods, are reported in (i) the non-financial statement contained in the Unipol Integrated Annual Report and (ii) the UnipolSai Sustainability Report, as well as in the pages dedicated to the theme of respect for Human Rights on the company website.

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



**Unipol Gruppo S.p.A.**

Registered Office

Via Stalingrado, 45

40128 Bologna

[www.unipol.it](http://www.unipol.it)