

GUIDELINES FOR LIFE
UNDERWRITING
BUSINESS WITH
REFERENCE TO
ENVIRONMENTAL,
SOCIAL AND
GOVERNANCE FACTORS
("LIFE ESG GUIDELINES")

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TABLE OF CONTENTS

1.	Introduction	4
1.1.	Document Objectives	4
1.2.	Approval and revision of Guidelines.....	4
2.	Reference Context	5
2.1.	Internal and external regulatory references	5
2.2.	Scope of application	6
2.3.	Definitions and terminology	6
3.	Identification of Sustainability Risks and Adverse Effects on Sustainability for Companies.....	7
4.	Incorporating Sustainability Risks into the Life Underwriting Processes.....	8
4.1.	Incorporating Sustainability Risks into Life Underwriting Processes.....	8
5.	Incorporating Adverse Sustainability Effects into the Life Underwriting Processes.....	9
5.1.	Classification, Assessment and Management of Adverse Sustainability Effects.....	9
5.1.1	Pension products, protection products, savings products	10
5.2.2	Investment Products.....	10
6.	Roles and responsibilities of the players involved	11
6.1.	Board of Directors	11
6.2.	Control and Risk Committee.....	11
6.3.	Group Risk Committee	12
6.4.	Appointments, Governance and Sustainability Committee	12
6.5.	Life Business Departments (or equivalent organisational structures of the other Companies in scope)	12
6.6.	UnipolSai Sustainability Department.....	12
6.7.	UnipolSai Risk Area	13
6.8.	Actuarial Department	13
7.	Reporting	13

1. Introduction

The Unipol Group (the "Group") is committed to contributing to sustainable development, as defined by the United Nations 2030 Goals (SDGs, Sustainable Development Goals), by incorporating this commitment into its business model. In the insurance sector and in the financial sector in general, there is a growing interest in understanding the implications of risks related to environmental, social and governance factors (so-called "ESG factors") on company performance, as well as the impacts of business choices on the environment, individuals and society.

This document defines guidelines for the management of non-life business underwriting (the "Guidelines") with reference to

- Sustainability risks, in order to define the approach to identify, assess and manage their potential impacts on the risks of loss or adverse change in the value of insurance liabilities, as part of underwriting processes;
- Adverse effects on sustainability that may be generated even indirectly by the decisions of companies in the underwriting process, with potential reputational risk.

The focus on Sustainability Risks and Adverse Sustainability Effects in underwriting processes ensures compliance with the Unipol Group's values, demonstrating responsibility in decision-making and dialogue with stakeholders.

1.1. Document Objectives

The Guidelines govern underwriting and pricing activities related to the Life business products in scope by promoting:

- the incorporation of ESG factors into the insurance core business processes and strategies;
- the implementation of a management approach that allows a correct and timely assessment of exposure to Sustainability Risks, along with the definition of responsibilities and consequent actions;
- the gradual adoption of a due diligence approach that incorporate Sustainability Adverse Effects into assessments related to the underwriting of policies with corporate policyholders (hereinafter the "Customers") operating in the various economic sectors, through a system of identification and monitoring thereof;
- the adoption of ESG principles to raise awareness of the potential benefits of incorporating ESG into the insurance business.

1.2. Approval and revision of Guidelines

The Guidelines, for the drafting/revision of which all the corporate structures concerned are involved in order to ensure that objectives, roles and responsibilities are clearly defined and approved, are approved by the Board of Directors of the parent company Unipol Gruppo S.p.A. ("Unipol" or the "Parent Company"), in the exercise of its management and coordination activities vis-à-vis its Subsidiaries and in accordance with the Group's corporate preparation and validation of company policies.

Subsequently, the Boards of Directors of the Companies in scope (to be understood as defined in Section 2.2 below), as part of their responsibilities in the area of governance, internal control system and risk management,

evaluate and approve the Guidelines, to the extent applicable, in accordance with specific industry regulations and their own business model.

The Guidelines shall be revised and – if necessary – amended whenever regulatory update requirements, interventions by Supervisory Authorities, business strategies or changes in the context (significant changes in business processes, significant structural reorganisations, significant changes in the Group's business sectors, changes in the Materiality Analysis) so require and , in any case, at least annually.

The Guidelines are communicated and made available by the Companies in scope to all relevant personnel through appropriate communication channels and posted on their respective websites.

2. Reference Context

2.1. Internal and external regulatory references

The Guidelines have been drawn up in consideration of and in accordance with the relevant European and national legislation in force, as well as in compliance with the sector supervisory guidelines set out below.

European legislation:

- Regulation (EU) 2019/2088 of the European Parliament and of the Council of 27 November 2019 on sustainability reporting in the financial services sector;
- Regulation (EU) 2020/852 of the European Parliament and of the Council of 18 June 2020 establishing a framework to encourage sustainable investment and amending Regulation (EU) 2019/2088;
- Commission Delegated Regulation (EU) 2021/1256 of 21 April 2021 amending Delegated Regulation (EU) 2015/35 as regards the incorporation of sustainability risks into the governance of insurance and reinsurance undertakings;
- Commission Delegated Regulation (EU) 2021/1257 of 21 April 2021 amending Delegated Regulations (EU) 2017/2358 and (EU) 2017/2359 as regards the incorporation of sustainability factors, sustainability risks and sustainability preferences into the product control and governance requirements for insurance companies and distributors of insurance products, and into the rules applicable to the conduct of business and investment consulting concerning insurance investment.
- Commission Delegated Regulation (EU) 2022/1288 of 6 April 2022 supplementing Regulation (EU) 2019/2088 of the European Parliament and the Council with regard to the regulatory technical standards specifying the details of the content and presentation of the information related to the "do not cause significant harm" principle, which specify the content, the methodologies and presentation of information regarding sustainability indicators and adverse sustainability effects, as well as the content and presentation of information regarding the promotion of environmental or social characteristics and sustainable investment objectives in pre-contractual documents, websites and periodic reports. The date of entry into force and application of this Regulation is 1 January 2023.

Italian legislation:

- Legislative Decree No. 209 of 7 September 2005 ("Private Insurance Code");

- Legislative Decree No. 252 of 5 December 2005, as amended, containing the “Regulation of Supplementary Pension Schemes”;
- COVIP resolution of 22 December 2020, as amended, containing the "Supervisory instructions on transparency";
- IVASS Regulation No. 38/2018 laying down provisions on the corporate governance system.

2.2. Scope of application

These Guidelines are adopted by the Group's insurance companies having their registered office in Italy and conducting Life insurance business (the "Companies in scope" or the "Companies"). This is without prejudice to the possibility for the Parent Company to identify, on the basis of risk-based assessments and within the limits of compatibility with specific sector regulations, to which other companies to extend the application of these Guidelines.

With regard to the incorporation of the Adverse Sustainability Effects into the underwriting criteria, the Guidelines apply in cases of contracts to be entered into with **legal entity Customers other than natural persons ("legal entities")**, thus excluding business relationships with individual natural persons from the scope of application.

2.3. Definitions and terminology

ESG factors (Environmental, Social, Governance)	Matters with environmental, social and governance impact considered to be relevant for the Group, the reference stakeholders and for society as a whole ¹ .
United Nations Sustainable Development Goals (or 'SDGs')	Sustainable Development Goals - Sustainable Development Goals (SDGs) - defined within the scope of the “2030 Agenda for Sustainable Development” plan of action for people, the planet and prosperity, signed in September 2015 by the governments of 193 UN member states. It consists of 17 objectives, which in turn are broken down into 169 specific targets.
Sustainability risk or ESG risk	An environmental, social or governance event or condition that, if it occurs, could cause an actual or potential adverse effects t on the value of the investment or the value of the liability.
Adverse effect on sustainability	Adverse effect, even indirectly, of investment decisions on ESG factors.
Reputational Risk	The risk that an internal or external event will cause a misalignment between the Group's promises and actions and the expectations and perceptions of its main stakeholders and, therefore, may negatively impact their perception of the Group and, consequently, of the expected economic results.

¹ Matters with social, environmental and governance impact are considered to be "the environmental, social and employee matters, respect for human rights, anti-corruption and anti-bribery matters", as defined in Article 2 No. 24 of Regulation (EU) 2019/2088.

<i>Principles for Sustainable Insurance (PSI)</i>	An insurance industry initiative in cooperation with the United Nations <i>Environment Programme - Finance Initiative</i> (UNEP FI) and United Nations <i>Global Compact</i> (UNGC), which has defined 4 principles for incorporating environmental, social and <i>governance</i> matters relevant to the insurance business into decision-making.
Sustainable success	The objective that guides the actions of the Board of Directors is the creation of long-term value for the benefit of shareholders, taking into account the interests of other stakeholders relevant to the company.
<i>United Nations Global Compact</i> (UNGC)	UN initiative which aims to promote the culture of corporate social responsibility through the sharing, implementation and dissemination of common principles and values. It provides for compliance with 10 Principles in four areas: Human Rights, Labour, Environment, Anti-Corruption.

3. Identification of Sustainability Risks and Adverse Effects on Sustainability for Companies

The Group has established a transparent and systematic approach to the incorporation of ESG factors into the underwriting process which, inter alia, was necessary in view of two documents that are essential for defining the Group's strategy, namely the **Sustainability Policy** and the **Risk Management Policy**.

The Sustainability Policy defines the Group's commitments to (i) improve its sustainability performance; (ii) manage and mitigate the ESG Risks to which it is exposed, consistent with the Group's overall risk management system, as well as the Adverse Effects on sustainability, generated from its business activities and transactions.

The Sustainability Policy, with specific reference to Sustainability Risks, refers to specific risk management policies specific in terms of operational implementation, and especially to the Risk Management Policy, which establishes the guidelines for the identification, assessment, monitoring and mitigation of risks, including environmental, social and governance risks, as well as the definition of operational limits within which to operate, in line with the general risk propensity defined by the Group (i.e. *Risk Appetite*) also by referring to specific risk management policies.

The Risk Management Policy explicitly states that, as part of the Group's overall risk management system (i.e. *ERM - Enterprise Risk Management - Framework*), environmental, social and governance risks are identified and monitored in relation to their impact on underwriting risks; the impacts that risks related to environmental, social and governance factors may have on the Group's reputation are also identified and monitored.

The Risk Management Policy makes explicit the main ESG risk areas identified for the Group, which are: climate change, increasing social polarisation, socio-demographic change, technological change in society, violation of human and workers' rights, environmental damage and negative impact on the environment, as well as conduct in breach of the integrity of business conduct.

The identification of Sustainability Risks and Adverse Sustainability Effects relevant to the Group is done through a multi-step process, with a subsequent level of detail:

1. Emerging and Reputational Risk Observatory identifies and classifies potential risk areas into four macro areas (social, technological, environmental and political), highlighting which risk scenarios have a direct connection to ESG factors;

2. a cross-functional Round Table, composed of the Risk Area, Audit, Compliance and Anti-Money Laundering and Sustainability Departments, is responsible for identifying in detail potential Sustainability Risks and potential Adverse Sustainability Effects along the value creation process, mapping the controls implemented,, in line with the process taxonomy adopted within the Group and, on the basis of this mapping, suggesting possible improvement actions.

4. Incorporating Sustainability Risks into the Life Underwriting Processes

The Companies are aware of the increasing prominence of Sustainability Risks in the Life underwriting processes.

In general, the Group is committed to developing its sustainability expertise both in terms of provision of services, also with the involvement of the distribution network, and in raising its customers' awareness of the implications that sustainability risks may have on their health and mortality as well as on tangible assets, and as regards financial market trends.

These activities are also carried out by Companies in scope which, aware of the growing importance of Sustainability Risks, consider their possible implications in the Life underwriting processes.

With particular reference to the physical risks (both acute and chronic) from climate change, companies have identified a number of ways in which climate change can potentially affect their business, namely:

- changes in current mortality and morbidity and uncertainty about future trends (e.g. air quality, food and water safety, global temperature change);
- changes in the insurance environment involving general uncertainty about the timing, extent and response to climate change.

In this regard, the Companies undertake to strengthen their capacity to assess these impacts over time, through the search for relevant data to be used, also in order to take into account the significant differences in the impacts themselves according to factors such as the location, demographic and socio-economic profile of the Customers.

At the same time, the Group is committed to identifying effective risk mitigation actions, to be implemented also in order to appropriately counter adverse selection, thus preserving insurability.

4.1. Incorporating Sustainability Risks into Life Underwriting Processes

As part of the pricing process, with due proportions depending on the reference products, the Companies in scope undertake to carry out a correct detection, evaluation and monitoring of the technical risks of mortality, longevity and morbidity/disability by carrying out a review of the technical basis adopted, when necessary.

The Companies are aware that climate change can affect the demographic characteristics of the population, including risks of longevity, mortality and morbidity, both in terms of acute and chronic physical risks in the long term. However, the uncertainty of the magnitude and timing of these changes as well as the partial availability of data limit the applicability of demographic models to date.

In any case, the companies in scope monitor the ways in which climate changes evolve with respect to historical data, as well as their possible impact on future trends and prospects, also with reference to catastrophic risks.

5. Incorporating Adverse Sustainability Effects into the Life Underwriting Processes

The Group acknowledges the important role of the insurance industry as an enabler of people, businesses and communities through the risk transfer process that supports its sustainability and business continuity.

The Group's commitment in this area is aimed, first and foremost, at supporting its Customers to increase their awareness of the current or potential adverse effects on ESG factors generated by their behaviour and, where possible, to make its expertise available to them (in the form of information, guidelines, tools, services) to support the prevention or reduction of such adverse effects.

Furthermore, the Unipol Group, through the identification of the adverse effects on sustainability, generated or that may be generated by potential contracting legal entities (taking into account the sector in which they operate and the way in which they manage their activities), contributes to a more conscious assessment of their accuracy, soundness and transparency. To this end, the Group is committed to progressively structuring and extending a due diligence approach to incorporate the identification, assessment and monitoring of adverse sustainability effects related to its business relationships into the underwriting process. This approach also makes it possible to identify any negative impacts on the reputation of the Group and the companies with respect to their stakeholders.

5.1. Classification, Assessment and Management of Adverse Sustainability Effects

The Group adopts a process to classify Adverse Sustainability Effects. This is done through the identification of potential negative impacts on ESG factors generated by its Customers in relation to the different economic sectors they belong to and the specific sustainability management approaches adopted by them.

Actual or potential adverse sustainability effects may vary depending on the business sector in which the potential customer operates, the economic sectors it serves, the geographical area or countries of operation (in the case of multinational companies or companies that trade internationally), the characteristics of the customer, the type of products demanded and other factors.

The classification of actual or potential negative sustainability effects is based on a map of potential adverse effects related to different economic sectors, useful to give a general indication of the potential of each economic sector to generate adverse sustainability. The methodological framework adopted is based on the analysis and application of a wide variety of sources².

Taking into account the specific characteristics of the different types of life products, the approach to be adopted in assessing the Negative Sustainability Effects for each of them is defined below.

² These include, by way of example, authoritative international sources such as the United Nations Global Compact (UN GC), United Nations Environment Programme Finance Initiative (UNEP FI), United Nations Principles for Sustainable Insurance (UN PSI); the methodologies and reports from rating agencies specialising in ESG performance; internal sources such as the Group's Emerging and Reputational Risk framework, sector analyses, media reports; and collaboration with non-governmental organisations on specific topics.

5.1.1 Pension products, protection products, savings products

The pension, protection and savings products aimed at the employees of the contracting/adhering legal entities are deemed to have an intrinsic social value in a logic of integration between public and private welfare, such that there are no limitations and exclusions related to the area of operation of the contracting company.

5.2.2 Investment Products

For investment products, as a consequence of their characteristics and therefore of the role they play for companies, the Unipol Group identifies specific limitations in relation to sectors whose risk of generating negative sustainability effects (and possible reputational risk) make them incompatible with the Unipol Group's sustainability approach and risk management objectives.

Companies belonging to these sectors must therefore be considered excluded from the legal entities with which the Group proposes to underwrite investment products.

Companies operating in the following sectors are not eligible to underwrite investment products:

- companies that draw 30% or more of their revenues from coal mining or power generation from thermal coal, which do not show a sufficiently ambitious positioning in terms of transitioning their business to a low/carbon regime;
- companies that adopt unconventional mining practices (such as mountaintop removal, hydraulic fracturing – fracking –, tar sands, deep water drilling);
- companies that develop and produce weapons that are controversial and/or banned by international treaties;
- companies that distribute weapons in areas of conflict or civil war, or to countries that perpetrate systematic human rights violations;
- companies transporting controversial and/or internationally banned weapons to areas of conflict or civil war, or to Countries perpetrating systematic human rights violations;
- commercial activities intended solely or predominantly for gambling (such as VLT rooms and the like).

The Companies in scope adopt and formalise in appropriate corporate communication documents (DCAs), addressed to all actors inside and outside the Group, suitable measures to ensure the application of the above limitations to the processes of the underwriting and distribution of investment products.

From a general point of view, the Group undertakes to take the utmost care, with the support of its internal processes and tools, not to enter into contractual relationships with parties that operate in a condition of:

- violation of human and workers' rights³;
- exploitation of natural resources that does not take due account of their environmental impacts;
- systematic use of corruption and illegal practices in business management.

³ For example, workplace conditions, gender or racial discrimination, child or forced labour in supply chains.

To this end, the Group has adopted **processes and tools aimed at supporting the assessment of current and potential adverse sustainability effects in the underwriting process**, in a gradual manner that takes into account the increasing diffusion of awareness at all levels and the implementation of the tools that support it, in a way and time frame proportionate to the size of the entities involved and the contractual transactions.

In relation to the underwriting of investment products, the Group adopts a structured approach that integrates a system of delegations linked to quantitative underwriting thresholds, internal regulatory and communication tools, and training activities, to support the identification and assessment of the most significant Adverse sustainability effects related to transactions in this area.

6. Roles and responsibilities of the players involved

In order to achieve an effective control of risks and impacts that are relevant to Life business underwriting with reference to ESG Factors, it is necessary that, at the Parent Company and the other Companies in scope, the relevant *governance* process is clearly and consistently established. The tasks and responsibilities of the corporate bodies and functions of the Parent Company and the other Companies in scope are defined below.

6.1. Board of Directors

The Board of Directors of the Parent Company, also in the exercise of its management and coordination activities with regard to the Companies in scope, approves – after review by the Control and Risk Committee, the Nominating, Governance and Sustainability Committee and the Group Risk Committee – these Guidelines, which define the framework for identifying, assessing, monitoring and managing Sustainability Risks and Adverse Sustainability Effects related to underwriting decisions, and their subsequent amendments; it reviews reports on the evolution of Sustainability Risks and Adverse Sustainability Effects at least once a year.

The Boards of Directors of the other Companies in scope, perform, for the aspects applicable thereto, in accordance with the specific industry regulations and business model and within the area of their responsibilities, the same activities as those performed by the Board of Directors of the Parent Company.

6.2. Control and Risk Committee

The Control and Risk Committees of the Parent Company⁴ and UnipolSai Assicurazioni S.p.A. ("UnipolSai") provide, vis-à-vis their respective Boards of Directors, support in defining the guidelines of the internal control and risk management system in order to contribute to sustainable success, so that the main business risks are correctly identified, adequately measured, managed and monitored line with Unipol and UnipolSai strategies.

The aforementioned Risk and Control Committees support the Board of Directors in defining the framework for identifying, assessing and managing Sustainability Risks and Adverse Sustainability Effects related to underwriting decisions; they review proposals for these Guidelines, which contain such framework, and their subsequent amendments; and they review reports on the development of Sustainability Risks and Adverse Sustainability Effects at least once a year.

⁴ Pursuant to IVASS Regulation No. 38 of 3 July 2018, the Parent Company's Control and Risk Committee also acts on behalf of Group Companies with "stronger" (excluding UnipolSai) and "ordinary" corporate governance.

6.3. Group Risk Committee

The Group Risk Committee reviews the contents of these Guidelines, including the framework for identifying, assessing, monitoring and managing Sustainability Risks and Adverse Sustainability Effects related to underwriting decisions defined therein, and their subsequent substantial amendments.

6.4. Appointments, Governance and Sustainability Committee

The Appointments, Governance and Sustainability Committees, set up respectively in the Parent Company and in UnipolSai, have proposing, advisory, investigative and support functions vis-à-vis the relevant governing bodies on, inter alia, ESG issues, coordinating – for the aspects within their areas of competence – the guidelines, processes, initiatives and activities aimed at overseeing and promoting the commitment of the company and, in general, of the Group to the pursuit of Sustainable Success.

The aforementioned Appointments, Governance and Sustainability Committees, each within their respective spheres of competence, shall examine in advance the contents of these Guidelines, including the framework for identifying, assessing, monitoring and managing Sustainability Risks and Adverse Sustainability Impacts related to underwriting decisions as defined therein, and any substantial subsequent amendments thereto, if they have not already been the subject of another resolution issued by their respective governing bodies; they shall examine, at least once a year, the reports on the evolution of Sustainability Risks and Adverse Sustainability Effects.

6.5. Life Business Departments (or equivalent organisational structures of the other Companies in scope)

The Life Business Departments (or equivalent organisational structures of the other Companies) ensure the application of these Guidelines in their underwriting and pricing activities; they review annual reports on the evolution of Sustainability Adverse Effects.

6.6. UnipolSai Sustainability Department

UnipolSai's Sustainability Department monitors regulatory and strategic developments on sustainability in the financial and insurance sectors, also with regard to matters related to Life underwriting activities, and, together with the Life Business Departments, proposes and prepares amendments to the Guidelines.

UnipolSai's Sustainability Department supports the players involved in the underwriting process for the application of the Guidelines. It shall also be involved by the Life Business Departments of the Companies in the event that, in the course of significant contractual transactions, for the Life sector or for the Group as a whole, a company proves to be uninsurable according to the criteria set out in these Guidelines, but it is nevertheless assessed by the Life Business Departments of the Companies (individually or jointly with the other business sectors) whether it is advisable to proceed with underwriting, or further investigations are necessary.

The latter, with the possible assistance of the Risk Area, supports the Life Business Functions in the necessary investigations, with the aim of proposing a solution consistent with the broader joint approach to mapping and assessing processes, risks and controls on ESG Factors adopted within the Group.

If the Departments involved deem it necessary, these cases may be submitted to the Group Risk Committee, which, in this context, is responsible for determining and assessing the concrete implications of ESG Factors in recruitment activities and defining choices consistent with the corporate vision in regard with the cases presented.

6.7. UnipolSai Risk Area

The UnipolSai Risk Area, in conjunction with the Sustainability Department, proposes, applies and updates the framework defined by the Guidelines with reference to the identification, assessment, monitoring and management of Sustainability Risks and Adverse Sustainability Effects.

6.8. Actuarial Department

The Actuarial Department includes sustainability risk remarks in the annual global underwriting policy opinion.

7. Reporting

The UnipolSai Risk Area prepares reports for all companies on the development of Sustainability Risks in the underwriting processes, and then it submits them to the Board of Directors and the Control and Risk Committee at least once a year.

UnipolSai's Sustainability Department monitors the application of the Guidelines with reference to the control of adverse sustainability effects in the underwriting process, and shares a summary report of the results with the Life Business Departments on an annual basis. At least on an annual basis, the Board of Directors, the Appointments Governance and Sustainability Committee and the Unipol Group and UnipolSai Risk and Control Committee receive a report prepared by the Sustainability Department on the monitoring of adverse effects in the underwriting processes and on any prevention and mitigation actions taken.

The results of the application of these Guidelines are included in the Group's annual reporting documents (Unipol Group Integrated Annual Report and UnipolSai Sustainability Report).

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