

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

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**GUIDELINES FOR NON-LIFE BUSINESS UNDERWRITING WITH REFERENCE TO
ENVIRONMENTAL, SOCIAL AND GOVERNANCE FACTORS
(“NON-LIFE ESG GUIDELINES”)**

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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 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 effects on the risks of loss or adverse change in the value of insurance liabilities, as part of the underwriting processes;
- Adverse sustainability effects that may be generated even indirectly by the decisions of Companies in the underwriting process, with potential impacts also in terms of reputational risk.

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

1.1. Document Objectives

The Guidelines govern underwriting and pricing activities in all branches of the Non-Life business 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 Adverse sustainability effects into assessments related to the underwriting of policies with corporate policyholders 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 model;
- the introduction of tariff flexibility, where applicable, in relation to the Sustainability Risks of its customers.

1.2. Approval and revision of the 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 endorsed 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, 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 reviewed 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.

The Parent Company's Group Insurance General Manager drafts and updates the Guidelines and proposes them for review and approval to the competent bodies.

2. Reference Context

2.1. Internal and external regulatory references

The Guidelines were drafted in accordance with current legislation and 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 firms;
- 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 products;
- EIOPA Report on Non-Life underwriting and pricing in light of climate change (EIOPA-BoS-21/259).

Italian legislation:

- Legislative Decree No. 209 of 7 September 2005 (“Private Insurance Code”);
- IVASS Regulation No. 38/2018 laying down provisions on the corporate governance system et seq.

2.2. Scope of application

These Guidelines are adopted by the Group's insurance companies having their registered office in Italy and conducting Non-Life insurance business (the "Companies" or "Companies in scope").

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 should the application of these Guidelines be extended.

With respect to the integration of the Adverse sustainability effects into the hiring criteria, the Guidelines apply in cases of contracts to be entered into with **legal entities 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 the 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 consist of 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 on the value of the investment or the value of the liability.
Adverse sustainability effect	Adverse impact, even indirect, of investment decisions on ESG factors.

¹ Social, environmental and governance impact issues are defined as “environmental, social and personnel issues, respect for human rights and issues relating to the fight against active and passive corruption” as defined in Article 2 no. 24 of Regulation (EU) 2019/2088.

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.
<i>Principles for Sustainable Insurance (PSI)</i>	An insurance industry initiative in cooperation with the <i>United Nations Environment Programme - Finance Initiative (UNEP FI)</i> and <i>United Nations Global Compact (UNGC)</i> , which has defined 4 principles for incorporating environmental, social and governance issues relevant to 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 (UNGC)</i>	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 sustainability effects for Companies

The Group has established a transparent and systematic approach to the incorporation of ESG factors into the underwriting process.

The importance of integrating ESG factors into the underwriting process is set out, inter alia, in two key documents for Group strategy and management, namely the **Sustainability Policy** and the **Risk Management Policy**.

The Sustainability Policy defines the Group's commitments to improve its sustainability performance and to manage and mitigate: (i) the ESG Risks to which it is exposed, consistent with the Group's overall risk management system, as well as (ii) the Adverse sustainability effects generated by the Group as a result of its business activities and relationships.

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 reference to specific risk management policies.

The Risk Management Policy explicitly states that, as part of the Group's overall risk management system (so-called *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 distinguishes between ESG risks incurred (i.e. sustainability risks) and ESG risks generated (i.e. potential adverse sustainability effects).

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. the Emerging and Reputational Risks Observatory, starting from the forecast of changing macro-trends in the external context, classified into four dimensions (social, technological, environmental and political), identifies and classifies potential risk areas highlighting which risk scenarios have a direct connection with ESG factors, and for those ESG risks that have been defined as priorities, it identifies the main exposure factors on non-life technical risks;
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 Non-Life underwriting processes

The Companies are aware of the increasing prominence of Sustainability risks in Non-Life underwriting and pricing.

In general, the Group is committed, through its expertise and the services it has developed, and also with the involvement of the distribution network, to supporting its customers in reducing the sustainability risks to which they are exposed, by developing risk assessment activities, advising on prevention approaches, applying remote services, and thus increasing their access to insurance services.

The area in which the incorporation of Sustainability Risks has reached the highest level of maturity is climate change; this is (i) due to the particularly serious and urgent nature of managing its impacts, (ii) under the stimulus generated by the considerable focus of regulators and supervisors on the issue, and (iii) due to the significant efforts of the scientific and technological community to provide data and analysis to support the identification of related risks.

Companies are aware that acute physical risks from climate change in particular include changes in the frequency of large-scale catastrophic events, for which it is difficult to identify trends. At a general level, the Group is continuously engaged in identifying innovative solutions for the creation of shared value in the management of sustainability risks, with particular reference to climate change, by developing – also with the support and co-financing of EU institutions – tools that help raise public and private sector

awareness of climate change risks and support the definition of adaptation and prevention measures, which help reduce risks while preserving insurability².

4.1. Incorporating sustainability risks into the Non-Life pricing processes

As part of the pricing process, the Companies in scope take into account Sustainability Risks and, in particular, the physical risks arising from climate change, by adopting the following control measures, with the appropriate proportions depending on the assessment of the more or less significant exposure to the risks of the reference lines of business and/or products³:

- implementation of a dynamic pricing policy, which allows to act promptly in defining the pricing interventions to be implemented with respect to newly issued policies, even in the face of changes related to the impacts of Sustainability risks;
- constant maintenance of the portfolio, by adjusting, when policies expire, to the latest tariff versions. To this end, it should be noted that the exposure to Sustainability Risks of the portfolios of the Companies in scope is mitigated by the prevalence of one-year and, to a lesser extent, multi-year contracts. In addition, for policies for which tacit renewal is provided for, rates are adjusted to take account of changed conditions related to Sustainability Risks, in line with the terms of the contract;
- periodic review of the technical provisions (e.g. deductibles, limits of insurance) relating to the guarantees associated with natural events, as well as the insurance cover offered in the case of changes in risk;
- active management of the portfolio, through specific reform actions targeting older positions, aimed at adjusting the offer to customers, through the proposal of newer products that allow prices that are more accurate and responsive to changes in riskiness.

To support tariff definition, particularly with regard to guarantees relating to natural catastrophes, the Group also makes use of the results of dedicated models recognised in the insurance industry, which, depending on the risk in question, also allow predictive analyses to be carried out, as well as, more generally, to use calculation models that rely on historical data on the frequency and average cost of claims. In each case, the Companies in scope monitor the ways in which climate change is evolving with respect to findings from historical data, as well as its possible impact on future trends and prospects.

² See for example the LIFE DERRIS projects <http://www.derris.eu/> and LIFE ADA <https://www.lifeada.eu/it/> of which Unipol Group / UnipolSai Assicurazioni are lead partners.

³ These are less significant for **tailor-made** products: such products are in fact the subject of individual negotiations with the policyholder, during which case-by-case evaluations are carried out, based on a freer and more dynamic pricing process. Similarly, the pricing of suretyship policies is normally carried out by means of precise assessments, since these are guarantees with often diverse/limited contents that can be standardised, where the essential characteristics and main elements of the contracts are not determined autonomously by the Company, but derive from regulatory provisions and agreements between the parties (Policyholder and Beneficiary).

5. Incorporating Adverse sustainability effects into the Non-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 in increasing their awareness of the current or potential adverse effects on ESG Factors generated by their own behaviour and, where possible, to make its know-how 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 Adverse sustainability effects, generated or likely to be generated by potential contracting legal entities (taking into account the sector in which they operate and the way in which their activities are managed), contributes to a more conscious assessment of their propriety, soundness and transparency. To this end, the Group is committed to progressively structuring and extending a due diligence approach to integrate 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 adverse effects 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), its characteristics, and other factors.

The classification of actual or potential Adverse sustainability effects is done through two types of instruments:

- a map of potential adverse effects related to different economic sectors, which is useful to give a general indication of the potential of each economic sector to generate Adverse sustainability effects;
- a set of indicators measuring phenomena related to the management of the company, the sector in which it operates and the territory in which the potential customer is located, aimed at monitoring the potential to generate Adverse sustainability effects.

The methodological framework adopted is based on the analysis and application of a wide variety of sources⁴. The Group also seeks to avoid entering into contractual relationships with parties that operate in a condition of:

- violation of human and workers' rights⁵;
- exploitation of natural resources that does not take due account of their environmental impacts;
- systematic use of corruption and illegal practices in business management.

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**, which are gradually being implemented in view of the gradual spread of awareness, at all levels and in all Group Companies, in a manner and timing proportionate to the size and relevance of the entities involved and the contractual transactions.

In particular, UnipolSai takes appropriate measures, where applicable, to integrate sustainability considerations into the processes and strategies of its core Non-Life insurance business. The main measures in this regard are:

- the structuring of a **data-driven approach**, capable of integrating into the engagement process a summary assessment of the ESG performance of each customer, on the basis of which the compatibility or otherwise of the adverse effects (actual or potential) arising from the business relationship with the Group's sustainability approach and risk management objectives is defined; in the event of non-compatibility, the creation or continuation of the contractual relationship is excluded;
- the implementation of training and awareness-raising activities aimed at both internal structures and intermediaries, to support them in the application of these Guidelines and strengthen awareness of the role of Adverse sustainability effects.

Exclusions based on ESG benefits do not apply in the case of underwriting products that **protect the employees of contracting legal entities in the event of illness and accident**, in view of the social role these covers play vis-à-vis individuals. There are therefore no preconceived exclusions related to the contracting company's field of operation with regard to these products.

This is without prejudice to the underwriting of Non-Life insurance proposals where there is a regulatory obligation for the Companies to take out insurance.

⁴ 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 of 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 For example, workplace conditions, gender or racial discrimination, child or forced labour in supply chains.

On the basis of the Adverse sustainability effects classification adopted as described, the Group has identified a number of sectors to be excluded from its Non-Life underwriting activity, as well as a number of sensitive sectors that are given special attention in the ESG performance assessment process.

5.1.1 Excluded sectors

The following sectors are excluded from Non-Life underwriting⁶:

- companies that draw 30% or more of their revenues from coal mining or power generation from thermal coal, that do not demonstrate a sufficiently ambitious positioning in terms of business transition to a low-carbon economy;
- companies that adopt unconventional extraction practices (such as mountaintop removal, hydraulic fracturing – fracking –, tar sands, deep water drilling, shale gas and arctic drilling, and do not demonstrate a sufficiently ambitious positioning in terms of transition to a low-carbon economy;
- companies that develop and produce controversial weapons such as cluster munitions and submunitions, anti-personnel landmines, chemical weapons and biological weapons, including those for which the funding prohibitions set out in Law No. 220 of 9 December 2021 containing measures to counter the funding of companies producing anti-personnel landmines, cluster munitions and submunitions⁷ apply;
- 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).

5.2.2 Sensitive sectors

Sensitive sectors are considered to be given special attention in the ESG performance assessment process:

- **WASTE MANAGEMENT AND REMEDIATION ACTIVITIES**

The waste management sector (including car wrecking – auto wrecking) is a very sensitive area, particularly in the Italian context, due to its particular exposure to current and potential Adverse sustainability effects. The Group supports companies operating in the sector in a compliant

⁶ With reference to the Credit and Surety Businesses, please refer to the guidance provided in the Credit Policy.

⁷ Reference is made to "companies in any legal form whatsoever, established in Italy or abroad, which, directly or through subsidiaries or affiliates, pursuant to Article 2359 of the Italian Civil Code, are engaged in the activity of building, producing, developing, assembling, repairing, preserving, using, storing, holding, promoting, selling, distributing, importing, exporting, transferring or transporting anti-personnel landmines, cluster munitions and submunitions, of whatever nature or composition, or parts thereof". To ensure compliance with the ban on funding, the Companies shall at least consult publicly available lists of companies producing anti-personnel landmines and cluster munitions and submunitions.

manner and with a view to mitigating adverse effects on climate and nature (with particular reference to the pollution of terrestrial and marine ecosystems).

- **CONSTRUCTIONS**

The construction sector, which is of great importance for the development of the economic system as a driver of direct and indirect investments, presents sensitive aspects in all ESG areas (both environmental in terms of risks related to climate change and nature with regard to the use and pollution of soil and water resources, and social, as well as corporate governance), in relation to both large and small and very small players.

- **TRANSPORT AND STORAGE**

The transport sector (air, land, sea), with its central role in ensuring the mobility of goods and people, has a high exposure to ESG issues, with particular reference to environmental matters, due to the sector's significant impact on overall emissions, and social matters, with reference to working conditions.

- **AGRICULTURE, ANIMAL FARMING, FORESTRY AND FISHING**

The agricultural sector is of fundamental importance to society and the Group is committed to supporting and assisting it in the challenges it faces also in social and environmental terms, starting with those related to climate change as well as to the preservation of biodiversity and the protection of terrestrial and aquatic ecosystems.

- **TEXTILE AND LEATHER ACTIVITIES**

The textile and leather sector is exposed to environmental risks (with particular reference to adverse effects on water resources), animal welfare risks, and risks related to the protection of workers' rights and safety.

6. Roles and responsibilities of the players involved

In order to achieve an effective control of risks and impacts relevant to Non-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 Appointments, 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 Company⁸ 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, as well as adequately measured, managed and monitored, in 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 said framework, and their subsequent amendments; and they review reports on the development of Sustainability risks and Adverse sustainability effects at least once a year.

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 areas of competence, shall analyse in advance the contents of these Guidelines, including the framework for identifying, assessing, monitoring and managing Sustainability risks and Adverse sustainability effects related to underwriting decisions as defined therein, and any substantial subsequent amendments thereto, if they have not already been the subject of another resolution by their respective governing bodies; they shall analyse, at least once a year, the reports on the evolution of Sustainability risks and Adverse sustainability effects.

⁸ 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 "strengthened" (excluding UnipolSai) and "ordinary" corporate governance.

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

The Non-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 Adverse sustainability 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 Non-Life underwriting activities, and, together with the Non-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 Non-Life Business Departments of the Companies in the event that, in the course of significant contractual transactions, for the Non-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 Non-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 involvement of the Risk Area, supports the Non-Life Business Departments 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 underwriting 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 Function

The Actuarial Function includes Sustainability Risk considerations in its annual global underwriting policy opinion.

7. Reporting

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 Non-Life Business Departments on an annual basis. On an annual basis, the Board of

Directors, the Appointments, Governance and Sustainability Committee and the Risk and Control Committee of Unipol Group and UnipolSai 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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