

**PROTOCOL**  
**AGAINST ALL ACTS OF GENDER-BASED VIOLENCE AND/OR HARASSMENT**

On September 26<sup>th</sup>, 2024, in telematic mode

The **Group Generali Equal Opportunities Works Committee** constituted by  
the Company Party: Dott.ssa Valentina Tanzi, Avv. Maria Cristina Muglia, Dott.ssa Monica Bastiani,  
Avv. Daniela Marcantognini and Dott.ssa Margherita Criscuolo

and

Trade Unions Party: Dott.ssa Claudia Zanelli for FNA, Dott.ssa Rosaria Di Liberto and Daniela  
Stefanini for FIRST/CISL, Dott.ssa Daniela Lucifero for FISAC/CGIL, Dott.ssa Tatiana Dodi and Dott.ssa  
Valentina Luordi for UILCA, and Dott.ssa Silvia Da Soghe and Dott.ssa Milena Maffei for SNFIA

**Provided that**

- a) The Companies of the Generali Group have long been committed to valuing diversity and promoting inclusion, in order to create a working environment based on equality and respect, where everyone can strive for full fulfilment.

In line with the Joint Declaration of ANIA and OO.SS. of June 14<sup>th</sup>, 2019, the Group is committed to fostering an environment that respects human dignity and is open to listening, acting first on internal culture through awareness-raising, information and training activities at all levels, so that everyone recognises the employer as a safe reference point.

- b) Generali Italia has obtained the Gender Equality Certification provided for by art. 46 bis of the Codice delle Pari Opportunità (Equal Opportunities Code), confirming, among other things, the commitment to the prevention and management of any form of violence and/or harassment in the workplace.
- c) In accordance with the provisions of art. 49 of the CCNL ANIA of February 22<sup>nd</sup>, 2017, as amended by the Protocol of Renewal of November 16<sup>th</sup>, 2022, and art. 18 of the CIA of Group General of December 29<sup>th</sup>, 2015, renewed by Protocol of July 8<sup>th</sup>, 2021, with the Minutes of the Meeting of July 26<sup>th</sup>, 2024, the **Group Generali Equal Opportunities Works Committee was established** with the aim of promoting positive actions to create conditions of substantial equality of female workers and workers within the Group; in the exercise of its own functions, it proposes appropriate initiatives of prevention, information and awareness-raising, in accordance with the Joint Declaration on matters of harassment and violence of gender Workplaces signed between ANIA and OO. SS. on June 14<sup>th</sup>, 2019.
- d) The purpose of this Protocol is to define the general principles, the reference legislation and the behaviours that are not tolerated and/or prohibited, in accordance with the values expressed in the Code of Conduct, as well as the means of reporting and addressing them, in order to ensure a working environment free from violence and harassment of any form or nature.

The Protocol also aims to provide guidance on the prohibition of violence and/or harassment at work, as referred to in Law No. 4 of 15 January 2021 on the ratification and implementation of Convention ILO 190/2019, and on the company's procedures for

reporting acts and/or behaviours that do not comply with these provisions.

**In view of the foregoing, the parties agree that:**

### **1. SCOPE OF APPLICATION**

The acts and/or situations covered by this Protocol are violence, harassment, sexual harassment, gender-based violence and harassment, sexually inappropriate behaviour, discrimination and retaliation - as defined below - when committed against the people described below, on the occasion of, in relation to or arising out of their work, including behaviour suffered in the family and domestic environment as a result of violence of the primary affections, for which the employer intends to provide reasonable accommodation and support.

### **2. PERIMETER APPLICATION AND RECIPIENTS**

This Protocol applies to the companies of the Generali Group (Assicurazioni Generali S.p.A., Generali Italia S.p.A., Genertel S.p.A., GenertelLife S.p.A., Generali Welion S.c.a.r.l., Generali Operations Service Platform S.r.l., Cattolica Immobiliare Sp.A., Alleanza Assicurazioni S.p.A. and Alfuturo S.r.l.).

This Protocol shall apply to all persons who carry out activities in the companies of the Group, regardless of the type of contract (including apprenticeship, traineeship, fixed-term employment) and therefore to employees, self-employed persons, internal consultants, agents, both as persons to be protected and as persons obliged to comply with this Protocol.

This Protocol also applies to relations with third parties (suppliers, customers and external consultants).

### **3. DEFINITIONS AND EXAMPLES**

**Retaliation:** any adverse action taken against an individual because that individual has reported an actual or suspected violation of a Company or lawful regulation, or has reported prohibited or inappropriate workplace conduct; and/or has opposed conduct that may violate a Company or lawful regulation, or other prohibited or inappropriate workplace conduct; and/or has participated in the reporting and investigation process set forth in Company policies; and/or has assisted in an investigation or proceeding involving an actual or suspected violation of a Company policy.

**Direct discrimination:** when an employee is treated less favourably than another employee in a similar situation on the grounds of sex, nationality, ethnic origin, language, age, disability, sexual orientation, political, trade union and religious beliefs, parental or family care needs, pregnancy, maternity or paternity, including adoption, or the possession and exercise of such rights. In particular, gender discrimination is the use of sexist criteria in interpersonal and organisational relations at work.

**Indirect discrimination:** a situation in which an apparently neutral provision, practice,

criterion, act, agreement or behaviour, or a change in the organisation of working conditions and working time, places or is likely to place a worker at a particular disadvantage because of their sex, nationality, ethnic origin, language, age, disability, sexual orientation, political, trade union and religious beliefs, parental or family responsibilities, pregnancy, maternity or paternity, including adoption, or because of the possession or exercise of such rights..

**Workplace:** the context constituted by the relationships between people in the course of their work activity, in which the above-mentioned conduct may take place. This includes physical and digital workplaces, workplaces owned by third parties but directly or indirectly linked to the work activity (travel, journeys, commuting), places where lunch breaks are taken, changing rooms, sanitary facilities, means of transport, places of training, places for interviews and/or meetings, work-related social occasions.

**Mobbing:** refers to a range of aggressive and persecutory behaviours used in the workplace to hurt and marginalise the victim. It can take different forms, such as isolation, control, forced inactivity, constant criticism, insults, verbal and physical abuse and damage to reputation; it can take the form of **bossing**, where aggressive and harassing behaviour is perpetrated by the employer or a hierarchical superior, and of **straining**, where there is a stressful behaviour that produces lasting damaging effects over time, perpetrated against an employee even through isolated and non-systematic facts or episodes.

**Harassment:** is any attempted or occurring conduct, whether isolated or repeated, verbal, non-verbal, psychological or physical, which is unacceptable, inappropriate or unwanted and which has the purpose or effect of unreasonably interfering with a person's work performance, life style or dignity, or which creates a generalized state of fear or anxiety in the individual, which causes fear or anxiety for the individual's safety or the safety of his or her family, and which affects decisions about employment and professional development, or which is otherwise likely to create an intimidating, hostile, degrading, humiliating or offensive working environment, regardless of the identity of the recipient. More generally, this category includes any form of harassment based on sex (actual or perceived), race, colour, creed, religion or belief, sexual orientation or preference, gender identity or expression (including self-image, appearance or behaviour) or gender reassignment, age, disability, marital or civil partnership status, foreign or national origin, ancestry (including ethnicity) or status as a disabled person, pregnancy and maternity, medical conditions including those related to pregnancy or childbirth, status as a victim of domestic violence, sexual offences or stalking, unemployment or any other category protected by law.

**Gender and sexual harassment:** is an unwanted conduct occurring on grounds of gender, with the purpose or effect of violating the dignity of an employee and of creating an intimidating, hostile, degrading, humiliating or offensive environment; this definition also includes favourable treatment suffered by an employee because they have refused to submit to, or has submitted to, conduct constituting "sexual harassment". Sexual harassment is a subset of gender-based harassment and includes any conduct of a sexual nature – expressed in physical, verbal or non-verbal form – or the threat of such conduct, whether occurring on a single occasion or repeated, which is intended to, or does, or may be perceived to, violate the dignity of the person subjected to it or to create an intimidating, hostile, degrading, humiliating or offensive environment. It is an aggravating circumstance if the sexual harassment is accompanied by implicit or explicit threats or

blackmail by hierarchical superiors or persons who have influence over the establishment, performance and termination of the employment relationship (so-called "*harassment quid pro quo*").

**Harassment at work:** is an unwanted behaviour, also for reasons related to sex, with the purpose or effect of violating the dignity of an employee and of creating an intimidating, hostile, degrading, humiliating or offensive environment (Legislative Decree 198/2006, art. 26, paragraph 1). It is an aggravating circumstance if the harassment is accompanied by implicit or explicit threats or blackmail on the part of hierarchical superiors or persons who can influence the establishment, performance and termination of the employment relationship.

**Gender-based violence:** any act of gender-based violence that causes or is likely to cause physical, sexual, psychological or economic harm or suffering.

**Violence at work:** refers to "episodes" in which a person is abused, threatened or assaulted in circumstances related to work, including travel to and from work, with explicit or implicit consequences for health, safety and well-being (World Health Organization).

Examples of violence and harassment include, but are not limited to:

- Verbal insults or other expressions of unwelcome intimacy.
- Verbal expressions denigrating and insulting or howsoever referring to identifying elements of the person (ethnicity, nationality, religion, political affiliation, mental and physical diversity, health, age and any other personal data).
- Acts of mobbing, or behaviour such as to cause a change in negative, constant and permanent, the work situation, likely to affect the right to health (so-called "straining", or any other form of manipulation or psychological abuse or "straining").
- Physical violence or the threat of physical violence.
- Sexual harassment or attempted or actual sexual violence.
- Digital/online harassment/stalking. Sending sexually suggestive messages in any format; sharing or showing sexually inappropriate images or videos in any format.
- Engaging in sexual blackmail.
- Physical and/or psychological violence against a person because of their gender, gender identity or sexual orientation, including violence against women and LGBTQIA+ persons, and acts of persecution, see "stalking".
- The dissemination of intimate images.
- Making inappropriate sexual gestures.
- Controlling a person's use of money with the threat of removing economic resources, putting them in debt, preventing them from having a job and/or using their own resources as they wish.
- Using anecdotes, stories of a sexual nature or suggestive stories that make the person uncomfortable.
- Making comments about the person's sexuality or physical attraction, or making sexual comments about their appearance, making unwanted sexual advances.
- Making derogatory or degrading comments about a person's sexual orientation or gender identity or using insults with gender/sexual connotations.

- Repeatedly contacting a person (e.g., phone calls or persistent messages) or repeatedly asking for an appointment.
- Unwanted touching, including fondling, intentional rubbing of another person.
- Promising benefits of any kind - personal or professional - in exchange for sexual favours.
- Threatening retaliation or negative consequences of any kind - personal or work - if sexual favours are not granted.
- Treating someone in an unfair manner with the intention of harming or humiliating them.
- Using an aggressive and deliberately intimidating tone of voice or vulgar language.

#### 4. BASIC PRINCIPLES, COMMITMENTS

**Respectful behaviour:** everyone is required to behave in a courteous, respectful and appropriate manner at all times.

**Equality:** everyone must be treated with dignity and respect at work, regardless of the type of contract, but also of their position or other status.

**Equal opportunities:** for everyone, the absence of obstacles to participation in the life of the company, to opportunities for professional and career growth, to training opportunities must be recognised and/or allowed.

**Zero tolerance:** the Group is committed to maintaining a work environment free from discrimination, violence and harassment. Any form of discrimination, violence or harassment in the workplace is prohibited and will not be tolerated. The Group will take all necessary measures to deal with situations of discrimination, violence and harassment in a timely and appropriate manner, in accordance with the law and company policy.

**Proportionality and fairness:** recognising the concept of zero tolerance, the Group will take action that is proportionate and appropriate to proven cases of discrimination, violence and harassment, taking into account the totality of the circumstances and the seriousness of the cases, in accordance with laws and company policies.

**Privacy and confidentiality:** must be guaranteed to all persons involved, taking into account the circumstances, actions and initiatives that the Group is obliged to undertake in compliance with the law and company regulations.

**Non-retaliation:** the Group will not tolerate and will sanction any retaliation resulting from good faith reports of discrimination, violence and harassment. Conversely, any allegations made in bad faith will be subject to appropriate sanctions.

#### 5. CULTURE, EDUCATION, AWARENESS

The Group shall provide training on the subjects covered by this Protocol to all personnel at regular intervals, with timely planning, delivery and monitoring, and information also through brochures and the company intranet.

The Group undertakes to participate in initiatives, also external, and dissemination on the topics subject to this Protocol.

## **6. PROTECTION AND PREVENTION MEASURES**

As stated in the Risk Assessment Document, the Group intends to promote and implement the right of all individuals to work in an environment free from violence and harassment by adopting an organisational system and processes that ensure an inclusive, integrated approach and focus on the gender perspective. Hazards and risks related to violence and harassment at work are identified and assessed, and measures are taken to prevent and control them. These measures are and will be appropriate and proportionate to the level of control in the organisation and will include measurable targets. All appropriate measures will be taken to prevent harassment and sexually inappropriate behaviour and to ensure that the person reporting it does not suffer adverse consequences in terms of the allocation of duties or other work activities.

## **7. REPORTING PROCEDURES AND MANAGEMENT OF REPORTS**

It is essential for the protection of people, the environment and the Group's reputation that all employees, regardless of contract type, report any acts of harassment, violence or sexually inappropriate behaviour. The Group therefore emphasises the importance of reporting such behaviour, supporting any victims or witnesses and protecting them from any retaliation for making a report. As soon as the Group becomes aware of an incident of harassment or sexually inappropriate behaviour, it is committed to investigating and dealing with the report promptly and impartially.

The Group adopts, and encourages its employees to adopt, a non-judgmental approach to those who suffer harassment or violence in the workplace, in order to create a working environment in which individuals can safely report any incidents.

In the case in which conduct in violation of this Protocol or one of the prohibited conduct described in point 3 of itself occurs or is attempted, whoever has knowledge or the protected person themselves - without prejudice to the possibility of recourse to the competent authorities - is obliged to report it to the channel designated by the Company, directly or through the Human Resources function of reference, or their own manager or superior on the basis of the lines of reporting or the Trade Unions (OO.SS.).

The procedure for dealing with reports shall ensure the fair protection of both the reporter and the reported person; to this end, the reports shall describe in detail the facts, events or circumstances that constitute the basis of the alleged harassment or violence, and shall be made with a degree of detail sufficient to allow for concrete verification, on the basis of the investigation tools available, of the grounds for or otherwise of the reported facts and circumstances.

To this end, the report must be made in writing, by registration or other similar means, and must contain the following elements:

- a clear and complete description of the facts to be reported;
- the circumstances of the time and place in which the facts subject of the report have been committed; the generalities or other elements (such as the qualification and the service in which the activity is performed) which allow to identify the subject/s who has/have committed the facts subject of the report;

- an indication of any other persons who may have reported the facts that are the subject of the report;
- an indication of any documents which may confirm the grounds for such facts;
- any other information that may provide useful feedback on the existence of the reported facts.

In all cases, the investigation procedure must guarantee the confidentiality and protection of the personal data of the person making the report and of the person who may be the subject of the report.

Reports made anonymously or by unidentifiable persons will not be taken into consideration.

If deemed necessary, the reporter may be spoken to in order to confirm or expand on the report and/or to request further information to facilitate the investigation.

Under this Protocol, employees are required to cooperate with investigations. In this regard, the Group is committed to creating a work environment in which each employee feels protected and free to report without fear of retaliation.

If the Group detects conduct that it considers to be in violation of this Code, or if it believes that someone has violated this Code, it expects that such circumstances will be reported and assures the protected person that such report will be listened to, treated with respect and not subjected to intimidation or retaliation.

For the management of reports, the person designated by the Company may, if necessary, call upon organisations/associations, psychologists and specialised lawyers to ensure adequate support for the victim.

The Human Resources function is involved in the investigation and, in depending on the nature of the cases, the competent doctor/company doctor (ML) and the Security function may be involved.

Persons may also request the assistance of the Industrial Relations, Legislation and Litigation function (IRLL) or the Human Resources Department or the Trade Union Organisation (OO.SS.) to report the violence and/or harassment suffered at work to the forces of law and order.

The present procedure does not limit in any way the criminal and disciplinary liability of the whistleblower in the hypothesis of slanderous reporting or for emulative and/or defamatory purposes pursuant to the Criminal Code and to art. 2043 of the Civil Code. They are also source of liability, in disciplinary and other competent venues, any forms of abuse of the present procedure, such as the reports manifestly opportunistic and/or made to only purpose to harm the complained or other subjects, and any other hypothesis of improper use or of intentional instrumentalization of the object of this procedure.

## **8. CONFIDENTIALITY AND PERSONAL DATA PROTECTION**

The Group will take all necessary measures to ensure the confidentiality of the identity of the reporter, of the person concerned and of any other person mentioned in the report, as well as of the content of the report and the related [xml-ph-0028@en](mailto:xml-ph-0028@en)

Alerts may not be used more than necessary to ensure appropriate follow-up. The identity

of the whistleblower and any other information from which it may be inferred, directly or indirectly, may not be disclosed to persons other than those responsible for receiving or following up on the whistleblower's report.

All personal data collected in connection with complaints or reports submitted under this Protocol, or in the course of related investigations, will be processed with the utmost confidentiality and in accordance with the provisions of Regulation (EU) 2016/679 (c.d. GDPR) and of D. Lgs 196/2003, as amended from time to time.

## 9. DISCIPLINARY MEASURES

Violation of the provisions contained in this Protocol, of principles, values, fundamental obligations and standards of any kind, may lead to the initiation of a disciplinary procedure by the Human Resources Department, which may result in an appropriate disciplinary measure, including dismissal, against the responsible employee.

Any employee who engages in or attempts to engage in conduct prohibited by this Protocol, harassment or sexually inappropriate conduct, which is reported and proven, shall be subject to disciplinary action, which may include dismissal.

Sanctions shall be imposed taking into account, inter alia, the seriousness of the offence, the nature of the behaviour, its possible repetition and the hierarchical relationship between the perpetrator of the act of violence or harassment and the protected person.

In cases of conduct in violation of this protocol carried out by subjects in possession of a para-subordinate or self-employment contract of employment or in the context of relations of administration of employment or of supply of services, the Company, depending on the cases, will intervene directly on the professional relationship in being or will inform the third-party employers.

Anyone who engages in any act of retaliation against the employee whistleblower or third-party whistleblower, including acts aimed at silencing the employee through economic incentives or other benefits, will be subject to disciplinary proceedings.

Retaliation is strictly prohibited and constitutes a violation of this Protocol.

Company Party:

*Valentino Casale, Jyly, Maria Botta, Donatelli, Margherita Cascardo*

Trade Unions Party:

FNA

*Claudia Scull*

FIRST/CISL

*D. Fabbro, Cole Stef.*

FISAC/CGIL

*Paola Scafaro*

UILCA

*Tatiana Pochi, Umberto Morici*

SNFIA

*Silvia De Lorenzis, M. Maffei*



## APPENDIX REGULATIONS

### Normative references and internal codes

They are included in the normative references of the CIA, the Code of Conduct and the Corporate Policies:

- CCNL 20.02.2017 (and agreement of renewal of 16.11.2022): articles. 25 and 49
- Code of self-discipline of companies responsible in favour of maternity General 21.12.2023 (adhesion agreement Ministry Family)
- CIA General 8.7.2021 Appendix 5 Diversity & Inclusion - Support for parenthood - Support for companies in preventing and combating gender-based violence and harassment
- Joint Declaration ANIA and OO.SS. 14.06.2019 in the matter of harassment and violence of gender in the workplace
- Gender Equality Management System of Generali Italy S.p.A. in compliance with UNI/PDR 125:2022 certified by RINA
- Strategic Plan for Gender Equality: Paragraph 7 Area Thematic n. 6
- Whistleblowing procedure
- Risk assessment document: DVR Generali Italy S.p.A. Par. 7.31 Risk of harassment and violence in the workplace
- Generali Group Code of Conduct 2019 (Work Environment, Diversity and Inclusion)

### Normative references

They are included in the normative references, the regulations international and Italian, including the regulations of sector:

- Art. 2087 of the Civil Code. The entrepreneur is obliged to adopt in the exercise of the enterprise the measures that, according to the particularity of the work, the experience and the technical, are necessary to protect the physical integrity and the moral personality of the workers of work;
- [ILO Convention No. 190/2019](#) concerning the elimination of violence and harassment at the place of work;
- ILO Recommendation No. 206 of 21/06/2019 (Suggestions and Guidelines for the Application of Convention 190/2019);
- Directive 2002/73/EC (concepts of harassment and sexual harassment);
- [EU Directive 2024/1385](#) (Lotta alla violenza contro le donne e alla violenza domestica);
- Recommendation 92/131/EEC of 27/11/1991 (Promoting awareness that any behaviour of a sexual connotation that offends the dignity of men and women at work is inadmissible);
- European Framework Agreement on Harassment and Violence at Work of 26/04/2007;
- [Legislative Decree no. 198 of 11 April 2006](#) Code of Equal Opportunities between Men and Women:
  - Art. 26, paragraphs 1 and 2 (equalisation between sexual harassment and gender discrimination);
  - Art. 40 (equivalence between harassment and discrimination also in terms of procedure, sanctions and evidence);

- Art. 26, par. 3-bis: (specific protection for those who are judged to have suffered harassment or sexual harassment in the company);
  - D. Lgs. 9 April 2008 n. 81 Testo unico in materia di salute e sicurezza nei luoghi lavoro: Art. 28 (valutazione di tutti i rischi e del rischio molestie);
  - [D. Lgs. 15 June 2015 no. 80](#) Measures to reconcile the needs of care, life and work, in implementation of Article 1, paragraphs 8 and 9, of Law no. 183 of 10 December 2014: Art. 24 (paid leave for women victims of violence);
  - D. Lgs. nos. 196/2003 and SMI, and Regulation (EU) 2016/679 of the European Parliament and of the Council, of 27 2016, relating to the protection of natural persons with regard to the processing of personal data, as well as the free circulation of such data and repealing Directive 95/46/EC (General Regulation on the Protection of Data or GDPR).
  - INAIL Guidelines "Recognition for the prevention of the phenomena of harassment and violence at work" (2021)
  - UN Global Compact and UN Women, Women's Empowerment Principles (and model policy on gender-based violence and harassment at work)
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- Court Constitutional, judgment no. 359 2003
  - Supreme Court, judgment no. 18927 of 2012
  - Supreme Court, judgment no. 3692 of 2023
  - Supreme Court, sec. Labour, judgment no. 17698 of 2014
  - Supreme Court, judgment no. 15159 of 2019
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