



**Generali Asset Management S.p.A.
Società di gestione del risparmio**

WHISTLEBLOWING POLICY

**ANNEX IV: IBERIAN BRANCH: SEXUAL AND
OTHER UNLAWFUL HARASSMENT PROTOCOL**

INTRODUCTION

Generali Asset Management S.p.A. Società di gestione del risparmio, Iberian branch. (hereinafter, "**Company**") is aware of the need to protect individual fundamental rights. Especially, all persons' dignity in the workplace. We believe that the culture and values of the Company are oriented towards respect for the people who make up the organisation. Hence, the parties recognise the need to prevent and eradicate all of those behaviours and organisational factors that reveal sexual and/or gender-based harassment—in accordance with the principles inspiring international, European and national regulations—in the Company providing procedures for the prevention and resolution of conflicts in these cases.

Likewise, the Company is committed to its role as guarantor of the protection of the fundamental rights of its entire workforce and the responsibility it has in ensuring that interpersonal relationships—which are necessarily forged in any professional activity—are conducted with respect for the fundamental rights of individuals.

Harassment is an attack on the right to physical and moral integrity. It also attacks dignity, privacy, honour and equal treatment, which are rights recognised in articles 10, 14, 15 and 18 of the Spanish Constitution and articles 4 and 17 of Spanish Workers' Statute.

This protocol complies with the requirements of articles 46.2 and 48 of Organic Law 3/2007, of 22 March, for the effective equality of women and men, article 12 of Organic Law 10/2022 of 6 September on the integral guarantee of sexual freedom, Royal Decree RD 901/2020 of 13 October, which regulates equality plans and their registration and modifies Royal Decree 713/2010, of 28 May, on the registration and deposit of Collective Bargaining Agreements and article 14 of Law 31/1995, of 8 November, on the prevention of occupational hazards.

In order to comply with this commitment, the Company implements hereafter a procedure for prevention and intervention against sexual and/or gender-based harassment and any other modality of harassment with the intention of preventing it and laying down a mechanism that establishes how to act in a comprehensive and effective way against any behaviour that may constitute sexual and/or of gender-based harassment.

To achieve this, this protocol lays down three types of measures that include the minimum content established in section 7 of the Annex to Royal Decree 901/2020 of 13 October:

1. Preventive measures, including a statement of principles, the definition of sexual harassment and gender-based harassment and the identification of behaviours that could constitute these types of harassment; including training and awareness-raising measures on sexual harassment and gender-based harassment.

2. Proactive or procedural measures to deal with harassment in order to channel any complaints or reports that may arise and measures aimed to avoid or minimize these practices.

3. Identification of reactive measures to deal with harassment:

- Corrective measures, including disciplinary measures.
- Measures to compensate or restore the rights of the victim of sexual and/or gender-based harassment.

ZERO TOLERANCE

Sexual and gender-based harassment are totally prohibited within the organisation and are considered unacceptable. Therefore, the parties agree to guarantee the following principles:

- Everyone has the right to be treated in a correct, respectful and dignified way, respecting their privacy and their physical and moral integrity. Employees will be treated this way under any circumstances, regardless of birth, race, sex, religion, opinion or any other personal or social condition or circumstance, including their employment status. Employees may not be exposed to degrading.
- All employees have the right to effective occupational health and safety protection, with a corresponding duty to protect themselves by preventing risks arising from their work, including those arising from violent conduct and harassment.
- Given the status of sexual and gender-based harassment as a psychosocial risk in the workplace, the Company is committed to providing the human and material resources necessary to prevent these behaviours.
- The Company shall ensure a risk-free working environment and undertakes to adopt the necessary measures, both organisational and in terms of training and information, to prevent harassment.
- The Company recognizes the importance of developing training and informative actions to help prevent sexual and/or gender-based harassment. It is also important to inform and train all staff, ensuring that new recruits are aware of the content of this protocol and to make them aware of the values on which it is based.

- Without prejudice to any administrative or legal action that may be taken on an individual basis, staff who consider that they have been victims of sexual and/or gender-based harassment have the right to request the initiation of the procedure provided for this purpose, which is detailed below.

OBJECTIVES

The purpose of this protocol is to develop a procedure for the prevention and resolution of conflicts in matters of sexual and/or gender-based harassment, guaranteeing the right of the employees to claim its initiation —as well as any right— within a context of precaution and confidentiality. Reports of sexual or gender-based harassment will be handled with precaution, confidentiality and without undue delay.

This protocol shall in particular seek to:

- **Promote a culture of prevention** of sexual and/or gender-based harassment in the Company.
- **Prevent, detect and resolve** possible situations of sexual and/or gender-based harassment.
- Internally **investigate**, in an agile, rapid and confidential way, complaints of sexual and/or gender-based harassment in order to determine whether such a situation has arisen in the Company.
- **Determine the need to take preventive measures** during the investigation process until the final resolution of the procedure.
- **Provide the assistance** deemed necessary for the victim, avoiding secondary victimisation or re-victimisation, and propose the necessary measures of reparation in the event that a situation of sexual harassment and/or harassment on grounds of sex is found to have existed.
- **Protect persons who have made a complaint** of sexual and/or gender-based harassment, including persons who come forward as witnesses, by ensuring that those involved in a proceeding are not subjected to intimidation, persecution or retaliation. Any such action shall be subject to disciplinary sanctions as deemed appropriate.
- **Adopt disciplinary measures** against the harassing person when the reported conduct is proven, as well as disciplinary measures in the event of possible claims based on untruthful facts.

Scope

This protocol shall be applicable to all persons providing services in the Company in national territory, without exclusions or distinctions based on their nature or legal relationship, including temporary employment agencies' employees.

It is also applicable to persons who, not having an employment relationship, provide services or collaborate with the Company, such as trainees, those who carry out non-labour practices, contract and subcontract companies' employees and self-employed persons who provide services for the Company, in application of the procedures for the coordination of business activities in preventive matters between different companies.

The protocol shall apply to situations of sexual and/or gender-based harassment occurring at work, in connection with work or as a result of work:

- in the workplace, including in public and private spaces when they are considered a workplace,
- during work-related travels, trips, social or training events or activities,
- in the context of work-related communications, including through the use of information and communication technologies (virtual harassment or cyberbullying),
- in commuting between home and the place of work,
- in accommodation provided by the employer.

Validity

The period of validity or duration of the protocol for prevention and intervention against sexual and/or gender-based harassment shall be four years and it will be reviewed, if necessary depending on the Company's internal policies and new regulations. Once the four years period have elapsed and none of the circumstances mentioned below concur, the protocol will be extended for equal periods of four years

Notwithstanding the above, the protocol shall be reviewed in any case in the following cases:

1. At any time during its validity with the aim of reorienting its objectives of prevention and intervention against sexual harassment and/or gender-based harassment.
2. When its lack of compliance with legal and regulatory requirements or its inadequacy is revealed as a result of action by the Labour and Social Security Inspectorate.

3. In the event of merger, takeover, transfer or modification of the legal status of the Company and in the event of any incident that substantially modifies the Company's workforce, its working methods or organisation.
4. When a final judicial decision declares the lack of sufficient measures in the Company in order to prevent gender or sexual discrimination or determines the lack of adaptation of the protocol to the legal or regulatory requirements.
5. When the Company agrees or implements an equality plan.

PRINCIPLES

Confidentiality and anonymity

All persons involved in any of the phases of the procedure are obliged to maintain strict confidentiality and secrecy. Therefore, they must not disclose or communicate information relating the complaints filed, resolved, or under investigation of which they are aware. From the initial complaint onwards, codes will be assigned to the parties concerned, so that no names will appear until the termination and the final report is enacted. For these purposes the members of the Investigating Commission will sign a confidentiality agreement (Annex II) and they will also make the individuals interviewed during the investigation procedure to sign a confidentiality agreement (Annex III).

Secrecy

All the individuals involved in the procedures set out under this Protocol shall be subject to the duty of discretion with regards to the facts that they get to know as per their position during the investigation and evaluation of claims, complaints and reports. Nobody could use the information obtained for their own or third parties' interest, or to the detriment of the public interest.

Diligence and celerity

The investigation and termination of the procedure should be carried out without undue delay. So, the procedure can be completed in the shortest possible time, with all guarantees of the process being respected.

Respect and dignity

The Company shall take appropriate measures to protect the dignity and privacy of the persons concerned, including the person allegedly harassed and the alleged harasser. At the same time, the principle of the presumption of innocence of the alleged harasser shall be respected.

Contradiction

The procedure will ensure an objective hearing and a fair treatment for all the parties involved. The principle of good faith will lead the procedure and the aim will be to clarify the events brought by the allegedly harassed individual or any claimant.

Reinstatement of the victim

If the sexual and/or gender-based harassment has resulted in a worsening the victim's working conditions, the employer shall reinstate the victim on the same terms and conditions.

Data Protection

The Company will comply with all Data Protection rules provided for in legislation.

Protection against retaliation

All workers have the right to be protected against retaliation after having complained and/or exercised their employment rights. Any action qualified as a retaliation will be considered null and void.

DEFINITION

Sexual harassment

Article 7.1 of Organic Law 3/2007, of 22 March, for the effective equality of women and men, provides for a definition of

sexual harassment. It is any verbal or physical behaviour of a sexual nature that has the purpose or effect of violating the dignity of a person, in particular, when it creates an intimidating, degrading or offensive environment, being sufficient to be considered as such if it is a single serious episode, although generally harassment is not conceived as something sporadic, but as something insistent, reiterated and persistent. Such harassment shall in any case be considered discriminatory, especially when a right or an expectation of a right is made conditional on the acceptance of a request of a sexual nature. Sexual harassment includes all behaviours of a sexual nature, both those that are directed at a specific person (bilateral) — whether or not in exchange for a specific demand (sexual blackmail)— and those of a sexual nature that may be directed not specifically at a group of people through writings, gestures or words that may be considered offensive (environmental

Type of Sexual harassment

There are two types of sexual harassment depending on the existence of authority power:

- 1) **"Quid pro quo" harassment or sexual blackmail:** It consists in forcing the victim to choose between accepting sexual demands, or losing —or being disadvantaged in obtaining— certain benefits or conditions of work, affecting access to professional training, continued employment, promotion, remuneration or any other decision in relation to this matter. As it is an abuse of authority, the harasser is the person who has the authority, either directly or indirectly, to provide or deny a benefit or condition of employment.
- 2) **Environmental sexual harassment:** As a consequence of their unwanted behaviour of a sexual nature, the harasser creates an intimidating, degrading, humiliating or offensive work environment for the victim. There is no authority or power, as this type of harassment can be committed by anyone working with the victim, no matter their category or status, or even by third persons who are present in the workplace.

As an example, without prejudice of other conducts, hereafter are described some behaviours that could be considered sexual harassment:

- a) **Verbal:** Unwelcome sexual advances, propositions or pressure to agree to sexual activities; insistence on participating in social activities outside the workplace, after the target has made it clear that such insistence is annoying and unwelcome; offensive flirtations; suggestive remarks, innuendoes or obscene comments; unwanted phone calls; jokes or comments about sexual appearance.
- b) **Non-verbal:** Display of sexually revealing or pornographic pictures, objects or writings, lewd looks, whistling or making certain gestures, sexually offensive letters or e-mails, text messages or other messages of a sexual nature.
- c) **Physical:** Deliberate and unsolicited physical contact, unwanted hugs or kisses, excessive or unnecessary physical contact.

Gender-based harassment

Article 7.2 of Organic Law 3/2007, of 22 March, for the effective equality of women and men, also provides for a definition of gender-based harassment. It consists in any behaviour motivated by a person's gender, with the purpose or effect of harming their dignity and creating an intimidatory, degrading or offensive environment.

Pregnancy and maternity discrimination, or any harmful practice motivated by a person's maternity, pregnancy or simply being a female, will be considered as a direct gender-based harassment.

This type of harassment will be considered discriminative, especially when it conditions the exercise of rights or expectations of rights to the acceptance of a conduct considered to be gender-based harassment, according to the aforementioned definition.

As an example, without prejudice of other conducts, hereafter are described some behaviours that —motivated by the victim's gender or sexual orientation, and with the purpose of harming their dignity— could be considered gender-based harassment.

- Unfavourable treatment of women and men solely because their gender.
- The exclusion of men or women from access to jobs, where such a requirement is not an essential occupational characteristic.
- Ignoring or excluding people on the basis of their sex/gender.
- Evaluating the person's work in an unfair or biased way on the basis of their sex/gender.

- Assigning tasks or work below the person's professional capacity or qualifications on the basis of sex/gender.
- Threats or pressure on people who support the harassed person.
- Manipulating, concealing or returning the person's correspondence, calls, messages etc.
- Explicit or implicit conduct aimed at making decisions about the person's access to vocational training and employment, continuity of employment, pay, or any other decisions related to this matter, when motivated by the person's sex/gender.

Online harassment or other unwanted conducts

Employees are prohibited from posting on or transmitting through any online network any unlawful, harmful, threatening, abusive, harassing, defamatory, vulgar, obscene, profane, hateful, racially or ethnically demeaning or threatening, or otherwise objectionable material of any kind, including, without limitation, any material that encourages conduct that would constitute a criminal offense, give rise to civil liability, or otherwise violate any applicable law or internal policy. More specifically, and without limitation, the following conduct violates internal policies and are not permitted:

- (a) Offensive communication: use of vulgar, abusive, or hateful language is prohibited.
- (b) Harassment: targeting another person or organization to cause distress, embarrassment, injury, unwanted attention, or other substantial discomfort is harassment, which is prohibited. Personal attacks or other action to threaten or intimidate or embarrass an individual, group, or organization; or attacks based on a person's race, national origin, ethnicity, handicap, religion, gender, disability, diseases, sexual orientation, or another such characteristic or affiliation are prohibited.
- (c) Offensive graphic files: transmitting through or posting on any online network sexually explicit images or any other content the college deems to be offensive is prohibited.
- (d) Impersonation: communications under a false name or designation or a name or designation community members are not authorized to use, including instances in conjunction with representing that one is somehow acting on behalf of or under the auspices of the Company, are prohibited.

PREVENTIVE MEASURES

To prevent and avoid every behaviour considered sexual and/or gender-based harassment, the Company will provide:

Information and awareness

The Company will carry out an informative and awareness-raising campaign about this protocol. This campaign will be made available to all staff providing services for the Company. It will also be posted on the Company's intranet.

Training

The Company undertakes to offer the necessary trainings in prevention and resolution of conflicts in matter of sexual and/or gender-based harassment to every member of the Commission. The Company will also provide training materials on prevention of sexual and/or gender-based harassment to all staff.

PROACTIVE AND PROCEDURAL MEASURES

Investigating Commission

An investigating and monitoring Commission for cases of sexual and/or gender-based harassment shall be set up by the BoD and shall be integrated by the following positions, provided that they are not involved in the complaint:

- Compliance Function of the Company
- Human Capital Function of the Company: In the event that any of the aforementioned persons are involved in the harassment or in the event of absence due to holidays, illness or any other legal cause, this person may act as a substitute for any of the members.
- Chief Executive Officer

The Commission will have a validity period of four years and if nothing is agreed once that period has elapsed, their positions as members of the Commission will be extended for equal periods of four years. The aforementioned persons who integrate this investigating Commission shall comply strictly with impartiality with respect to the involved parties. In the event of any

kind of consanguinity or affinity with any or some of the persons involved in the investigation, intimate friendship, or obvious enmity with the persons involved in the procedure, or direct or indirect interest in the specific procedure, they shall abstain from acting. In the event that, despite the existence of these situations, abstention does not occur, any of the persons affected by the procedure may request the recusal of said person or persons from the Commission.

In addition, this Commission, either by its own agreement or at the request of any of the persons affected, may request the hiring of an external expert who may assist them in the investigation of the procedure.

This Commission shall meet no later than 5 working days from the date of a complaint, report or having been aware of inappropriate behaviour, in accordance with the procedure laid down in this protocol for its submission.

The Commission shall immediately and thoroughly investigate any report, communication, complaint or report of behaviour that could be considered sexual or gender-based harassment. Complaints, allegations and investigations shall be treated in strict confidentiality, consistent with the need to investigate and take corrective action, taking into account that it may directly affect the privacy and honour of individuals.

All persons on the Commission, as well as the person in charge of the investigation of the case, must complete and sign the non-disclosure agreement (NDA) document in Annex II.

An instructor is appointed who will be the person in charge of promoting and supervising all the actions in the procedure, in order to resolve the case. This person will also be in charge of drawing up the Conclusions Report and will also be the person in charge of the administrative processing of the informative file, for which purpose he/she will issue the summons and take the appropriate minutes, as well as certifying the content or agreements and safeguarding the file with its documentation. In this regard, the instructor will HR

The expenses incurred by the Investigating Commission shall be borne by the Company.

Procedure

This protocol lays down an efficient and agile procedure for the investigation of any complaints or claims that may be made by those who have been or consider themselves to have been subjected to sexual harassment and/or gender-based harassment, as well as those who are aware of the aforementioned conduct. This procedure is also complete and guarantees that the necessary investigative measures are taken. This procedure will be initiated by the active reporting of such conducts.

Phase I: Reporting

The report can be made:

- (i) in writing in the form detailed in Annex I, using the e-mail address of the Compliance Function concerns.co@generali.com to the Investigating Commission, which will be the sole receiving body for all cases at the national level or,
- (ii) could be also submitted through the Generali Group Whistleblowing tool and in that scenario, the procedure set out in the Whistleblowing policy will apply and specifically.

The report can be also made:

- Directly in person;
- by e-mail: chiara.petronzio@generali.com;
- by post: Compliance Officer (Chiara Petronzio) — Piazza Tre Torri 1, 20145, Italy;
- by the Generali Group Compliance Helpline at <https://generali.whispli.com/speakup>,
- the Group Whistleblowing Helpline available at the Generali Group website (<https://www.generali.com/ourresponsibilities/responsible-business/code-of-conduct>) by phone or web;
- e-mail: concerns.co@generali.com; and
- post: Group Compliance – Group Ethics & Investigations – V. Machiavelli 3, 34132 Trieste, Italy; the Generali Group Compliance Helpline at generalihelpline.ethicspoint.com.

Whispli is the reporting tool of choice.

The URL address of the Generali Group Compliance Helpline can be found on the Group Corporate Web site (www.generali.com), on the Group Portal “WE, Generali” and on the local intranet sites.

The Helpline is a specific, autonomous and independent channels that differ from ordinary reporting lines and is hosted by an independent third-party provider that ensure appropriate levels of confidentiality of information. The Helpline is managed by the Group Compliance Officer Function.

The report of a case of sexual harassment and/or gender-based harassment at work must be made by the person affected or by a third party, or by the legal representatives of the employees who become aware of the facts and must identify themselves.

When the complaint is made following the procedure set out in this specific policy (point (i) above) the complaint must contain

(model complaint form included as Annex 1):

- Identity of the person making the complaint, of the victim of the sexual and/or gender-based harassment, and of the person being reported.
- Description of the facts (types of conduct that are the subject of the complaint, dates and places where the conduct took place).
- Provision, if applicable, of documentation accrediting the facts.
- Identification of possible witnesses.

When the person making the complaint is not the person directly involved or the victim, the first action should be to inform them in writing and request their ratification.

Both the victim of sexual harassment and/or gender-based harassment and the alleged harasser shall have the right to be accompanied and/or represented at all times by the person they deem appropriate throughout the procedure.

In the event that any of the members of the Investigating Commission should be involved in the alleged harassment or be otherwise related, have a friendly relationship or obvious enmity, immediate hierarchical superiority or subordination, or any other type of direct relationship with the complainant or the alleged harasser, casting doubt on their objectivity and impartiality in the process, they shall be automatically disqualified from taking part in the said process. Furthermore, the alleged harasser or the complainant shall be disqualified from taking part in any other proceedings until the resolution of his or her case. In these cases, each of the parties shall determine who will participate in the Investigating Commission to process the case, and substitutes may be appointed.

Phase II: Investigation

Once the complaint has been received, the investigation phase shall begin.

The **investigation phase** shall begin with a personal interview by the Investigating Commission with the complainant, whose statement shall be documented. The complainant shall be summoned within 5 working days of receipt of the complaint.

If the complainant is not the alleged victim, after the complainant's statement, the alleged victim will be summoned within a maximum period of 72 working hours in order to also take his/her statement and hear his/her version of the facts at first hand and, therefore, ratify the facts reported.

After interview(s) with the complainant and the victim, the alleged victim will be notified of the initiation of the investigation procedure and will be summoned for a hearing.

In order to protect the alleged victim and to avoid contact with the alleged harasser and interference during the investigation process, the Investigating Commission may propose preliminary measures during the investigation and until its resolution. Under no circumstances may these measures entail any detriment or impairment of the victim's working conditions, nor any substantial modification thereof.

In this phase, the main objective is to find out what the situation of the alleged victim is and to investigate the facts reported. To this end, the Investigating Commission may carry out interviews or other investigative actions with any of the persons involved, witnesses, or third parties considered to be able to provide useful information, in order to be able to conclude whether it is a case of sexual harassment and/or gender-based harassment at work.

If, even if there is no harassment, an inappropriate action or a situation of violence susceptible of being sanctioned is found, the Investigating Commission shall also urge the Management to adopt the measures it deems appropriate in this respect.

Of the actions taken, the Investigating Commission shall keep a record.

The Investigating Commission shall also keep a record of the proceedings carried out and the documents reviewed in the investigation file and signed by the parties.

As a general criterion, the estimated duration of this investigation phase shall be 20 working days (i.e. Saturdays, Sundays and public holidays excluded) from the filing of the complaint, provided that there are no circumstances that require the extension of this estimated duration; like the need to carry out of additional investigative measures, the need to travel to carry out the investigation, late statements by the alleged victim, witnesses or any other persons involved at their own request, overlap with holiday periods or situations of notified Temporary Incapacity, or any other circumstances that may arise.

The Investigating Commission will deal with each case individually, and will ensure that the victim is heard and supported at all times.

A digital file will be created with the documentation of all the actions carried out, which will be kept in the custody of the person in charge of the investigation.

Throughout the investigation process, the right to privacy of the persons involved will be respected, as well as confidentiality. For this reason, the identity of the persons interviewed shall be preserved and a code shall be assigned to them.

Phase III: Resolution

The person in charge of the investigation shall issue a report which shall be submitted to the Investigating Commission for

its assessment. The indicative time limit for the issuing of this report shall be 15 working days (i.e. Saturdays, Sundays and public holidays excluded), calculated from the end of the investigation phase.

The report shall include the following information:

- Background of the case.
- Preliminary or preventive measures, if any, taken on a temporary basis and during the course of the investigation.
- Investigative measures taken.
- Conclusions and proposed actions.

The Investigating Commission shall submit the conclusions report together with its recommendations, with grounds, for the adoption of preventive, corrective and disciplinary measures to the Management. Within the Investigating Commission on sexual and/or gender-based harassment, decisions shall be taken by consensus, whenever possible, and failing this, by majority vote.

REACTIVE AND VICTIM'S RELATED MEASURES

The Management, once it has received the conclusions of the Investigating Commission, shall take the decisions it deems appropriate within 5 working days.

The decision shall be notified in writing to the victim, the alleged harasser and the Investigating Commission, who shall treat this information with the strictest confidentiality.

If it is decided to adopt disciplinary measures against the harasser these shall be properly notified by the Management, in accordance with the disciplinary procedure established by the Collective Bargaining Agreement and any applicable regulations.

The Company shall adopt the necessary preventive measures to avoid a similar situation in the future, intensifying training and awareness-raising actions and carrying out actions to protect the health and safety of the victim, including, among others, the following:

- Assessment of psychosocial risks in the Company (by the relevant health and safety external providers).
- Adoption of surveillance measures to protect the victim.
- Adoption of measures to avoid recidivism of the sanctioned persons.
- Psychological and social support for the harassed person.
- Modification of working conditions that, with the prior consent of the harassed person, are considered beneficial for their recovery.
- Training or retraining for the professional updating of the harassed person when he/she has been on temporary disability for a long period of time.
- Carrying out new training and awareness-raising actions for the prevention, detection and action against sexual harassment and/or gender-based harassment, for all persons who provide their services in the Company.

This procedure does not preclude the right of the victim to file a complaint, at any time, before the Labour and Social Security Inspectorate, as well as before the civil, labour or criminal courts. If a complaint were to be made through any of the abovementioned channels, the Investigating Commission's proceedings could be paralysed or could also terminate the investigations.

OBLIGATION OF THE PARTIES

Obligations of the Company:

The Company has the full responsibility to guarantee the right of all persons to a healthy working environment, the obligation to promote working conditions that prevent sexual harassment and harassment based on sex and to establish procedures for its prevention and sanction (Organic Law 3/2007, art. 48).

It is the obligation of all persons with management responsibilities:

- Deal with any behaviour or attitude that may be offensive, annoying or discriminatory.
- Ensure compliance with and monitoring of the guidelines and principles set out in the protocol.
- Observe signs of sexual harassment and gender-based harassment.
- Facilitate the reporting of such situations using the established channels and processes.
- Respond appropriately to anyone who reports a complaint.
- Report or investigate complaints or allegations thoroughly.
- Follow up on the situation after the complaint.
- Maintain confidentiality of cases.

Workers' obligations:

Workers have a key role to play in creating a work environment where sexual harassment is unacceptable. They can contribute to preventing sexual harassment by being sensitive to the issue, and by ensuring standards of conduct towards themselves and others that are not offensive.

- These are obligations and rights of workers.
- The right to a healthy working environment and to be free from sexual harassment and harassment based on sex.
- The obligation to treat others with respect.
- The obligation not to ignore such situations.
- The obligation to report known situations of sexual harassment and harassment based on sex.
- The duty to cooperate in the investigation of an internal complaint of sexual harassment or harassment based on sex.
- The duty of confidentiality.

COMPANY COORDINATION AND EXTERNAL PERSONNEL

When the complainant and/or the person complained of do not belong to the staff of the Company but are user/s of the Company's services or facilities or belong to a contracted company or client, the procedure will be applied with the same guarantees and, where appropriate, in coordination with the company/companies involved by, following the following guidelines depending on each case:

a) Complainant person is not an employee of the Company but it is the person complained against.

In accordance with the complaint procedure, any person who considers themselves to be a victim of harassment or who has knowledge of a case of harassment will inform the Company. Once the complaint has been lodged, the procedure will be applied in the established manner, and the company involved will be informed:

- Opening of the case.
- Precautionary measures adopted, if applicable.
- Final resolution.

In addition, through the management, the company involved shall be asked for any documentation and information necessary for the Investigating Commission to clarify the facts. In the event that the company involved refuses to provide such information, this fact shall be recorded in the Investigating Commission's resolution report.

In the event that the harassment is established, the management shall take the necessary measures to reverse the situation and, to this end, the company to which the victim of the harassment belongs shall be notified of the final resolution of the case.

b) The complainant is an employee of the Company but not the person who is the subject of the complaint.

The complaint will be presented to the Company using the procedure described in this protocol. If the person denounced is an employee of a supplier or client company, once the complaint has been lodged, the procedure will be applied in the established manner, and the company involved must be informed of the following:

- Opening of the file.
- Precautionary measures adopted, if applicable.
- Final decision

Precautionary measures involving a change in the position or working conditions of the person reported will be proposed to the company to which he/she belongs and will be reported to the Investigating Commission in order to be included in the final resolution report. In the event that the company concerned does not respond or decides not to apply precautionary measures, the complainant will be offered the possibility of the precautionary measures being imposed on him/her, in order to prevent the continuation of the alleged harassment. In any case, they shall be accepted on a voluntary basis or they shall not be applied.

The management shall request from the company involved any documentation and information necessary for the Investigating Commission to clarify the facts. In the event that the company involved refuses to provide such information, this fact shall be recorded in the resolution report of the Investigating Commission.

In the event that the company involved in turn opens an investigation into the same case, it will be provided with the information and documentation necessary to clarify the facts and will be asked to provide information on the final decision to be taken.

c) Neither the complainant nor the respondent work at the Company

Both subcontracted personnel and users of services provided by the Company may be involved in situations of sexual harassment or harassment based on sex. In these cases, the complaint will lead to the opening of a file by the Management itself, which will be reported to the Investigating Commission.

The precautionary measures deemed appropriate will be adopted or, if it is not possible to apply them because the persons involved are not directly employed by the Company, a proposal for precautionary measures will be made to the companies involved.

In these cases, the Management will make itself available to the companies so that they may investigate the facts and resolve them as quickly as possible. Information on their decisions will be requested from the companies concerned in order to follow up and finally close the file. The closure of the case and the measures taken by all the companies involved will be reported to the Investigating Commission.

ANNEX I: COMPLAINT OR REPORT OF SEXUAL AND/OR GENDER-BASED HARASSMENT

I. Person reporting the facts

- Person victim of the harassment:
- Others (Specify):

II. Victim's personal data

Name:

Surname:

DNI (Identity Card Number):

Role:

Type of contract:

Phone:

Email:

Address for notification purposes:

III. Alleged harasser's personal data

Name and surname:

Category/Role:

Workplace:

Name of the Company:

IV. Description of the facts

Please include a complete report of the facts, attaching as many numbered sheets as necessary, including the dates on which the facts took place as long as it is possible.

V. Witnesses and/or evidence

In the case there are witnesses, please include their name:

Also attach any evidence deemed necessary:

V. Request

To consider the complaint or report of harassment (INDICATE WHETHER SEXUAL OR SEX-BASED) against (IDENTIFY THE PERSON BEING COMPLAINED) to have been filed and the procedure provided for in the protocol be initiated.

Place and date:

Signature of the individual submitting the report

ANNEX II: NON-DISCLOSURE AGREEMENT MEMBERS OF THE INVESTIGATING COMMISSION

Mr/Ms _____, has been appointed by Generali Asset Management S.p.A., Società di gestione del risparmio, Iberian branch, (hereinafter, the "**Company**") to be a member of the Investigating Commission against harassment and I have accepted this position.

As a member of the Investigating Commission, I will intervene in the procedure as regards the reception, investigation and resolution of workplace/sexual/gender-based harassment complaints that may occur in the Company. During all the procedure and different phases I undertake to respect the confidentiality, privacy, intimacy and impartiality of the parties.

Therefore, and more specifically, I hereby declare my commitment to fulfil the following obligations:

1. To guarantee the dignity of individuals and their right to privacy throughout the entire procedure, as well as equal treatment between women and men.
2. To guarantee secrecy and the utmost discretion in relation to information on situations that could constitute harassment at work, sexual harassment and/or harassment based on sex.
3. To guarantee the strictest confidentiality regarding the content of the complaints filed, resolved or in the process of investigation; as well as to ensure compliance with the prohibition of divulging or transmitting any type of information/data by the other individuals that are involved in the procedure.

I also declare that I have been informed by Generali Asset Management S.p.A., Società di gestione del risparmio, Iberian Branch, of the disciplinary measures that I could face if I fail to comply with the above obligations and that the content of the information gathered by the Commission will be only used for the purposes of the investigation procedure.

Signed: _____

ANNEX III: NON-DISCLOSURE AGREEMENT INTERVIEWEES

I, Mr/Ms _____, hereby intervene as an interviewee for the purpose of responding to the questions posed by the Investigation Commission designated by Generali Asset Management S.p.A., Società di gestione del risparmio, Iberian branch, (hereinafter, the "**Company**").

I, _____, undertake to respect the strictest confidentiality, privacy, intimacy and impartiality in my statements.

Therefore, and more specifically, I hereby declare my commitment to comply with the following obligations:

1. To guarantee the dignity of persons and their right to privacy throughout the entire procedure, as well as to preserve the identity and personal circumstances of the parties involved.
2. To guarantee reserved treatment and the utmost discretion, secrecy and confidentiality in relation to the information requested, the questions asked and the questions asked (as well as the answers given by myself) during the interview and/or meetings that may take place within the framework of the investigation procedure.
3. Guarantee the strictest confidentiality and secrecy regarding the content of the complaints filed, resolved or under investigation of which I am aware, as well as the status of the investigation procedure.
4. To ensure compliance with the prohibition on the disclosure or transmission of any type of information by the other persons involved in the procedure, including other interviewees and the person who is under investigation.
5. To guarantee the truthfulness of the statements I make in the meetings in which I participate with a view to clarifying the facts and preserving impartiality.

I also declare that I have been informed by Generali Asset Management S.p.A., Società di gestione del risparmio, Iberian branch. and, in particular, by the individuals designated by it in charge of the procedure, of the disciplinary liability I may incur for failure to comply with the obligations set out above.

Signed: _____