WHISTLEBLOWING NOTICE

The insurance intermediaries of the Convergo Group, in compliance with the provisions of law and with a view to ensuring fairness and transparency in the conduct of their business, have adopted a "whistleblowing" IT system, available to anyone wishing to report situations that are relevant under the law or internal regulations.

CHARACTERISTICS OF THE REPORT

The report must relate solely to **breaches of legislation or of internal procedures and regulations.** Please therefore note that reports concerning grievances, personal requests or, more generally, irrelevant circumstances may not be taken into consideration.

Reports must be made in good faith, be substantiated and be based on precise and consistent factual elements, also so as not to undermine the effectiveness of the tool made available to you. **Anyone who wilfully or with gross negligence makes reports that subsequently prove to be unfounded may be subject to disciplinary sanctions.**

HANDLING OF REPORTS

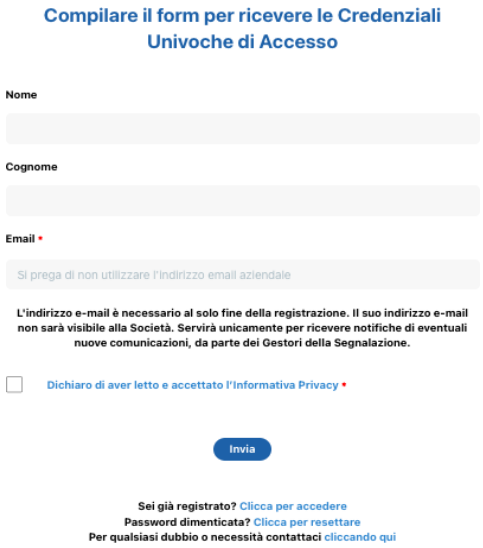
To provide the greatest possible protection to the "reporting person" and the "person concerned", the necessary security measures have been adopted: regardless of whether the "reporting person" chooses to make a report anonymously or not (as indicated in point 6 below in this document), the confidentiality of the identity of the person writing and of the content of the report is guaranteed through secure protocols and encryption tools that protect the personal data and the information provided.

The identity of the reporting person is never disclosed without their consent, except in the cases provided for by the applicable legislation. **The body responsible for handling reports is the Reporting Office of the company**.

HOW TO SUBMIT A REPORT

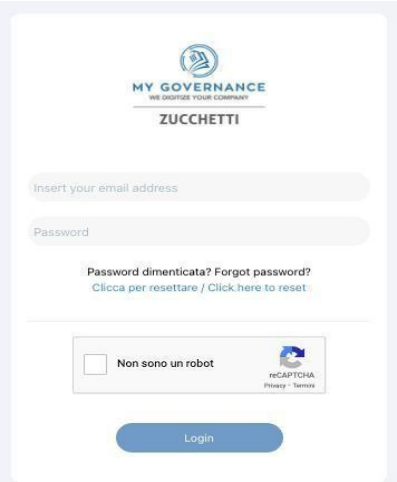
To submit a report you will need to:

1. Open the link of the relevant company and fill in the *form* with your first name, last name and a personal e-mail address (please do not use your work e-mail, as required by the Italian Data Protection Authority)

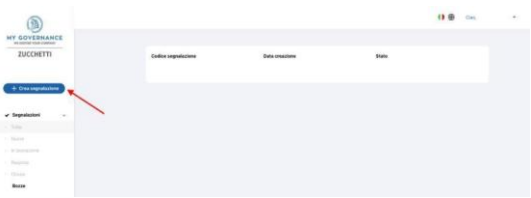


2. Follow the instructions in the e-mail containing the Unique Access Credentials

3. Log in to your account with your credentials



4. Click the "CREA SEGNALAZIONE" (Create report) button



5. At this point you can proceed with the report

(a) anonymously, using the relevant option; or

(b) not anonymously, but in any case with the confidentiality safeguards provided for by law.

The report may be submitted either in writing or orally by recording a voice message, where permitted by the reporting system. In both cases, tools are provided to guarantee the anonymity of the reporting person.



6. Once the reporting method has been chosen, the reporting person will fill in the form. Fields marked with the symbol * are mandatory. Some fields are free-text fields and must contain a minimum number of characters.

For any further questions or clarifications, please contact the Reporting Office.

REPORTING LINKS

Annex 1 - Reporting links

Convergo S.p.A. (formerly GBSAPRI S.p.A.)	https://areariservata.mygovernance.it/#!/WB/GBSAPRISpA
GBSAPRI nord S.r.l	https://areariservata.mygovernance.it/#!/WB/GBSAPRI-Nord
Convergo international S.r.l. (formerly GBSAPRI international S.r.l.)	https://areariservata.mygovernance.it/#!/WB/GBSAPRI-International
POLIASS S.p.A.	https://areariservata.mygovernance.it/#!/WB/Poliass

Without prejudice to the procedure set out in this notice and in accordance with the applicable law, please note that the reporting person may, as a secondary option, use the external reporting channel of ANAC (the Italian National Anti-Corruption Authority) where one of the following conditions is met:

- the reporting person has already made an internal report and it has not been followed up;
- the reporting person has reasonable grounds to believe that, if they made an internal report, it would not be effectively followed up or that there is a well-founded risk of retaliation;
- the reporting person has reasonable grounds to believe that the breach may constitute an imminent or manifest danger to the public interest.

For further information on how internal reports are submitted and handled, please refer to the Whistleblowing Procedure available on the company SharePoint.