



Europ Assistance Australia

## About the Generali Group Whistleblowing Helpline

### What is the Generali Group Whistleblowing Helpline?

Europ Assistance Australia (trading as InsureandGo and TickTravel) forms part of the Generali Group of companies. The Generali Group Whistleblowing Helpline is one of the confidential reporting tools assisting the Generali Group to address concerns on practices or actions possibly in breach of internal or external regulations, including the Generali Group Code of Conduct.

This Helpline is provided by Whispli (<https://generali.whispli.com/speakup>) and accepts reports in all the languages of the countries where the Generali Group operates.

### Why do we need the Generali Group Whistleblowing Helpline?

- First and foremost, to provide a confidential whistleblowing reporting channel for any Europ Assistance Australia employee, customer, service provider or other interested party.
- By creating open channels of communication, we can promote a positive and fair work environment.
- An effective reporting system will augment our other efforts to foster a culture of integrity and ethical decision-making.
- Research shows that externally managed helpline/webforms are frequently used by employees or third parties and are a very effective way for an organisation to detect breaches of regulations and unethical conduct.

### May I report using either the Internet or by telephone? And what if I don't have access to the Internet?

Yes, you have the ability to submit a confidential report via either telephone or Internet. If you can't reach a computer that can access the Internet or if you are uncomfortable using a computer, you can call the Generali Group Whistleblowing Helpline, which is available 24 hours a day, 365 days a year.

### Can I report anonymously?

You may choose to reveal your identity or submit a report anonymously. However, the Group believes that the investigation of any report will be most effective if the identity of the person submitting the report is known. The Group is committed to protect the identity of the Reporter and has a very strict anti-retaliation policy.





## Reporting – General

### **What type of situations should I report?**

The Generali Group Whistleblowing Helpline system is designed for employees and third parties to report any practice or conduct that they consider, in good faith, as inappropriate or inconsistent with the law, the Code of Conduct or other internal policies.

Reports must be adequately detailed in its description of the circumstances of the concern or breach.

### **What should NOT be reported through this channel?**

Do not use this Helpline/Webform to report events presenting an immediate threat to life or property. Reports submitted through this service may not receive an immediate response. If you require emergency assistance, please contact the relevant local authorities. In an emergency situation in Australia, please contact 000.

Request for commercial information or complaints from customers must not be submitted through this tool if related to the products or services provided to them by Europ Assistance Australia. These complaints have to be managed according to specific procedures as detailed in Europ Assistance Australia's internal dispute resolution process.

Reports from Europ Assistance Australia employees must not be submitted through this tool if related to dissatisfaction with their performance evaluation or career path unless connected with a breach i.e. unfair discrimination. Reports related to aspects of personal life of our employees which are not connected to their working activities or any conduct on behalf of the company must not be submitted through this channel.

### **I am not sure if what I have observed or heard is a breach of internal or external regulations or involves unethical conduct, but it just does not look right to me. What should I do?**

You could either ask the company's Compliance team or alternatively elect to submit a report through the Generali Group Whistleblowing Helpline.

### **If, as an employee, I become aware of a breach, shouldn't I just report it to my manager and let him/her deal with it?**

You may bring any concerns to your direct manager or HR, however, there may be circumstances where you are not comfortable reporting the issue in this manner.

If you are, for any reason, not comfortable sharing your concern with your direct manager or HR, or if you consider the concern significant or that it was not properly managed, you should contact Europ Assistance Australia's Compliance team or the Group Compliance Function.



The Compliance Officers, as responsible persons of an independent control function, ensure the management of reports and related investigations in a professional manner in accordance with the provisions of internal and external requirements.

It is critical that any relevant information is swiftly submitted to the persons closest to the source of the problem as their investigation and power to remedy are, in most cases, more effective and they can investigate and propose proper measures timeously. This principle is established to foster a culture of good communication and corporate social responsibility.

### **Why should I report what I know? What's in it for me?**

We all have the right to work in a positive environment and with that right comes the responsibility of acting ethically in the workplace as well as in our relationship with our third parties.

Thus, we should have the right and the duty to let the appropriate people know if someone is not acting correctly. Misconduct can threaten the reputation of Europ Assistance Asutralia and the Group, endangering our business and our relationship with stakeholders.

### **Does senior management really want me to report?**

They most certainly do. In fact, they *need* you to report. You may have initial knowledge of an activity that may be cause for concern. Your reporting can minimise the potential negative impact on the company, our people and third parties.

### **As an employee, should I worry about the consequences of submitting a report?**

The Group strictly prohibits retaliation against any employee who submits a report in good faith, no matter whom the report involves.

### **What if I remember something important about the incident after I submit the report? Or what if the person in charge with the case has further questions for me concerning my report?**

When you submit a report through the Generali Group Whistleblowing Helpline, you are asked to choose a username and a password to create your Whispli inbox. You can return to your Whispli inbox again and access the original report to add more detail or answer questions posed by the Compliance Officer in charge of the case. We strongly suggest that you return to the site in the time specified to answer possible questions. If you choose to submit an anonymous report, you can enter into an anonymous communication with the Compliance Officer.





### **What happens if, following the investigation, the concern turns out to be unfounded?**

If unfounded or unjustified, the Compliance Officer dismisses the report informing the Reporter. All documentation related to any report will be retained for no longer than necessary.

### **What happens if, following the investigation, the concern turns out to be accurate?**

If the report turns out to be accurate, the Compliance Officer will propose remedial measures to be implemented and evaluate whether disciplinary measures are appropriate considering the law and the internal regulations. The CEO or the Board of Directors will make the final decision.

All documentation related to any report will be retained for no longer than necessary.

### **What happens if, following the investigation, I am not satisfied with the result?**

If for any reason you are not satisfied with the result of the investigation please contact Europ Assistance Australia's Compliance Team. You may also approach the relevant authorities where appropriate in the circumstances.

## **Reporting Security**

### **It is my understanding that any report I send from a company computer generates a server log that shows every web-site that my PC connects with, and won't this log identify me as a report originator?**

The Generali Group Whistleblowing Helpline system does not generate or maintain any internal connection logs with IP addresses, so no information linking your PC to the Generali Group Whistleblowing Helpline is available. A high-grade AES256 encryption is used to protect your data. Your IP address is deleted every time and is never stored on our servers or logs

The Compliance Function has requested the IT Department not to track any connection to the Generali Group Whistleblowing Helpline made through the internal VPNs. If you still feel uncomfortable making a report on your work PC, you have the option of using your personal device outside the work environment (e.g., such as one located at an Internet café or at a friend's house) through the Generali Group Whistleblowing Helpline secure website.



**I am concerned that the information I provide through the Generali Group Whistleblowing Helpline will ultimately reveal my identity. How can you assure me that will not happen?**

The Generali Group Whistleblowing Helpline system is designed to protect anonymity. If you wish to remain anonymous, you - as a reporter - can decide not to reveal your identity.

**Does the telephone Helpline guarantee anonymity too?**

Yes, you will be asked to provide the same information that you would provide on the web form and an interviewer will type your responses into the Generali Group Whistleblowing Helpline website. These reports have the same security measures applied to the web reports.

**How can I identify myself?**

There is a section in the web form for identifying yourself.

If you call the Helpline, you can disclose your identity to the interviewer.

## **Confidentiality and data protection**

**Are the reports and data submitted treated confidentially?**

Yes, through any of the dedicated reporting channels you use, your reports, their possible follow-ups as well as your data and that of the individuals concerned will always be treated confidentially and handled with the utmost discretion, in accordance with the Generali Group Data Protection Policy and the applicable data protection legislation.

**What information shall I include in the report?**

You should only submit the information that is necessary to undertake an investigation of the concerns raised, for example you should not submit information about an individual's private life or sensitive data (including details of their health or sex life) unless it is strictly required and directly relates to the concern. You should also avoid submitting information about individuals that are not connected to the concern raised.

**Where do these reports go? Who can access them?**

Reports are entered directly on the third party service provider (Whispli) secure server to prevent any possible breach in security.





The information may only be reviewed and used by individuals who need to access the data to fulfill their job duties, in accordance with The Generali Group Process on Managing Reported Concerns or where required by law. These individuals include Compliance Officers and people from other internal functions, only if it is needed to properly manage the case.

The information may be stored by Whispli, Generali and Europ Assistance Australia.

The report will be handled confidentially and in accordance with the Generali Group requirements, details of which are available in The Generali Group Process on Managing Reported Concerns (see **Annexure A** of this document).

### **Will the information be transferred abroad?**

It may be necessary to share the details of the report within the Generali Group and/or its professional advisers located abroad. Where this occurs, it will always be compliant with the data protection legislation. Generali and its group companies including Europ Assistance Australia will take appropriate steps to ensure the confidentiality of the data.

### **Will the details of the report be shared with the individuals named in the report?**

In order to fairly review a concern it is often necessary to inform the accused person, so they can respond to the concerns. All reasonable actions will be taken to protect your identity in accordance with any authorisation provided and applicable laws.

### **How can access the information I provided?**

When you submit a concern, you will be provided with a unique PIN and prompted to enter a password. You can use these details to review and supplement the details of the report.

You can exercise the right of access to your data, or in certain circumstances ask for the data to be modified or erased, by logging into the system or calling the helpline and submitting a request for this. Your request will be passed to the appropriate Compliance Officer of the Generali Group, who will then provide you with the contact details for the person handling your request.



## The Generali Group Process on Managing Reported Concerns

### 1. Introduction

This document explains the process implemented by the Generali Group to manage concerns reported in accordance with the Generali Group Code of Conduct through the whistleblowing reporting channels.

### 2. Informally Handled Concerns

In the majority of cases reported to direct managers or Human Resources (HR), the reporter will have the expectation that the case will be handled informally by them and not escalated to other departments. Where the manager or the HR function is unable to informally resolve the concern, due to the seriousness, nature or a conflict of interest, the concern must be sent to the competent Compliance Officer<sup>1</sup> for its management.

The violation of applicable legal requirements must always be reported to the competent Compliance Officer.

### 3. Whistleblowing Reporting Channels

The Generali Group provides several alternatives to report a concern to the Compliance Function responsible for its management:

- Local Compliance Team: [compliance@europ-assistance.com.au](mailto:compliance@europ-assistance.com.au) / (+61) 0430 033 905)
- Group Compliance
  - by post: Group Compliance - Business Integrity - Via Machiavelli, 3, 34132 Trieste.
- The Generali Group Whistleblowing Helpline
  - by web form or phone numbers in all the countries where Generali operates in via <https://generali.whispli.com/speakup>

### 4. Initial Case Assignment

Once reported, the case will be assessed to identify the competent Compliance Officer for the management of the concern.

The case will be assigned based on the Generali Group internal regulations on handling concerns and this means that cases are normally assigned to the local Compliance Officer, other than in the following cases:

Cases Involving	Assignment of Concern
Local Compliance Officer	Business Unit Compliance Officer
Business Unit Compliance Officer and any local CEO or AMSB (Board) member	Group Compliance Officer
The Group CEO, the Group Compliance Officer and any other person to whom the Group Compliance Officer reports	Chairman of the Board of Directors of Assicurazioni Generali

Cases reported via the Generali Group Whistleblowing Helpline are automatically assigned to the competent Compliance Officer, following the above-mentioned rules.

The Business Unit and the Group Compliance Officers may be based in a country, other than where the concern took place; however, any information will be handled in accordance with applicable jurisdictions' regulations.

<sup>1</sup> The Compliance Group Policy qualifies the Compliance Function as independent from any operational function. The Compliance Officer reports to the Administrative, Management and Supervisory Body (AMSB).

## 5. Details needed to assign the case

When submitting a concern, the Reporter should provide the following information to assist the process for the assignment of the case:

1. The Country(ies) in which the Reporter is located;
2. The Country(ies) in which the reported Breach took place;
3. The Generali Group company(ies) to which the report relates;
4. Whether the case involves the Senior Management and/ or the Compliance Function;
5. Description of the events.

The above information will also assist the identification of cases where local law restricts the use of the reporting channels.

All information provided by the Reporter should be transparent, easy to understand and reliable. This will allow timely and robust management of the case. For example, information about an individual's private life or sensitive data (including health or sex life information) should not be submitted unless it is strictly required or directly relates to the concern.

## 6. Evaluation

A preliminary evaluation will be undertaken to ensure referral to the appropriate Compliance Function to handle the case and that the case is sufficiently detailed to enable an investigation.

Once the preliminary evaluation is complete, the Compliance Function will start investigating the case.

The evaluation and investigation of the case will be undertaken with the utmost confidentiality and the relevant information will be shared between the Compliance Function and other persons on a strictly need-to-know basis.

## 7. Remedial Measures

Following the investigation, the Compliance Function will propose the remedial measures that are needed.

Where disciplinary sanctions may be appropriate, the Compliance Function will involve HR in the process.

All remedial measures will be submitted to the competent corporate body (e.g., CEO, Board) for final decision.

## 8. Whistleblowing Tool

All the reported cases within the Generali Group will be recorded on the Whistleblowing Tool, other than those that are handled informally.

Access to the individual cases is defined on a case by case basis, and is limited to the Compliance Function and, where relevant and only on a need-to-know basis, to the persons handling the investigations.

The Whistleblowing Tool is hosted by a third-party provider on servers located within the European Union.

## 9. Reporting

The Whistleblowing Tool allows the production of regular reports at local, regional and group level. The reports are limited to generic details of the cases, including for example the number of cases received grouped by type of allegations involved or country.

The reports do not contain any personal information (for example the names of the individuals involved) about the cases, such as the identity of any of the individuals involved.



**10. Conclusion of the Case**

Once the case has been concluded, personal information held within the Whistleblowing Tool will be stored and removed in accordance with the applicable internal and external local provisions.

Where it is necessary to complete remedial measures or as required by local regulations, personal data may be maintained by the relevant functions outside the Whistleblowing Tool in accordance with applicable requirements.