

# **Generali Real Estate S.p.A. SGR**Stakeholder engagement policy for "GF PIERRE"

#### **POLICY**

AD USO ESCLUSIVO INTERNO

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#### **Document summary**

Title Stakeholder Engagement Policy for "GF Pierre"

**Classification** Policy

Approved by Board of Directors of Generali Real Estate S.p.A. SGR

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#### **Versioning and Ownership**

Version	Date of issuance	Reason for and Extent of Changes	Owner
1	2022-03-10	First Version of the document	ESG Function
2	2024-10-30	Update for the new SRI cycle	ESG Function
3	2025-06-26	As requested by the SRI Label Auditor, a clarification was added to specify that, whenever feasible, a tenant satisfaction survey is distributed annually to occupants.	ESG Function

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## **Glossary and Definitions**

Acronym/Term	Explanation/Definition
ESG	Environmental, Social and Governance factors.
GRE SPA	Generali Real Estate S.p.A.as Real Estate service provider herein and after the "service provider".
GRE SGR	Generali Real Estate S.p.A. Società di Gestione del Risparmio and the branch established in Paris.
ESG function	Function of GRE SGR responsible for ESG related matters.
Property manager	A person or firm charged with operating a real estate property, including keeping buildings in good condition and renting property.
Facility manager	A person or firm charged with maintenance of buildings and equipment.
ESG	ESG (Environmental, Social, and Governance) refers to the three key factors used to evaluate the sustainability and ethical impact of an investment.
SRI	The SRI (Socially Responsible Investment) label is a certification backed by the French government that identifies investment funds meeting specific ESG criteria.



## Roles and Responsibilities

Corporate Function	Roles and Responsibilities		
BOARD OF DIRECTORS/BOD of GRE SGR	<ul> <li>Approves the Policy and any mayor amendments, approves and reviews the general strategy on engagement with the main stakeholders ensuring the proper coordination at the Group level. The Board approves the Policy upon proposal of GRE SGR CEO, which is also in charge of the implementation of the Policy.</li> </ul>		
CHIEF EXECUTIVE OFFICER/ CEO of GRE SGR	<ul> <li>Proposes the Policy to the Board of Directors;</li> <li>Responsible for implementing the approved Policy.</li> </ul>		
ESG FUNCTION OF GRE SGR	<ul> <li>The ESG Function, under the direction of the CEO, is in charge for GF Pierre fund of: <ul> <li>Defining the list of priority stakeholders with whom the fund has established a relationship;</li> <li>Monitoring the number of approaches made to stakeholders and confirmations of successes and failures;</li> <li>Engagement formalization with a target to cover 100% of the property and/or facility managers involved in managing the assets and 100% of the main service providers in compliance with SRI Label¹;</li> <li>Contribution to the improvement of their ESG practices;</li> <li>Various reports related to ESG topic;</li> <li>Collaborates closely with the GF Pierre Fund Management Function and the relevant ESG, Transactions, Asset Management, and Property Management function of GRE SPA, providing ongoing support and coordination.</li> </ul> </li> </ul>		
FUND MANAGEMENT of GRE SGR	<ul> <li>Manages the AIF's portfolio and is responsible for its overall performance;</li> <li>Supports the ESG Function.</li> </ul>		

<sup>1</sup> Please note: GF PIERRE Fund will strive to achieve full coverage, while actual engagement may vary based on the willingness and cooperation of all parties involved.



### 1. Purpose

Generali Real Estate S.p.A. SGR ("GRE SGR") believes in the development and maintenance of open, transparent, and ongoing forms of engagement with all stakeholders. At Generali Real Estate, we are committed to aligning our core business strategy with the environmental, social, and governance (ESG) goals of Generali Group. Convinced that it is our duty to raise awareness and encourage its stakeholders to get involved and to act in favor of society and the environment, GRE SGR, through this Policy, wishes to improve the industry's practices. In this respect GRE SGR wishes to support its stakeholders in the integration of environmental, social and governance principles.

This is our vision of excellent and trustworthy leadership: walking alongside our stakeholders, understanding the wider impact of our decisions on them and acting responsibly, to improve their satisfaction and to inspire trust in our brand. To build on this vision, we:

- o run a sustainable business through our day-to-day activities, by:
  - listening to our stakeholders and considering their expectations in our decision-making in order to manage social and environmental risks;
  - turning information into knowledge to address megatrends and find solutions that align with the Sustainable Development Goals;
  - o practicing transparency by openly reporting on our progress in addressing social and environmental issues;
- o live the community, beyond day-to-day business operations, by:
  - acting strategically, mobilizing skills, resources, and networks to tackle society's most pressing challenges;
  - igniting chains of aid, of people helping people;
  - o focusing on results to achieve tangible and measurable impact.

This document is available to the public in the specific section of the Company institutional website, www.generalirealestate.com

The following stakeholder engagement policy applies to GF Pierre fund and describes the fund engagement towards its stakeholders.

Considering the activities regulated in this Policy, also for their potential implications, the document is relevant also for the purposes of the Legislative Decree no. 231/2001 with regard to the provisions of the Organization and Management Model as its integral part. Whoever becomes aware of potential violations of the provisions contained within this Policy must report immediately to the Surveillance Body established in accordance with the Legislative Decree no. 231/2001.

## 2. Responsibilities in the management of stakeholder's engagement

In line with the corporate governance, the GRE SGR Board of Directors is in charge of the approval and review of the general strategy on engagement with the main stakeholders ensuring the proper coordination at the Group level. The Board approves the Policy upon proposal of GRE SGR CEO, which is also in charge of the implementation of the Policy.

GRE ESG Function, under the direction of CEO, is in charge for GF Pierre fund of:

- o Defining the list of priority stakeholders with whom the fund has established a relationship.
- o Monitoring the number of approaches made to stakeholders and confirmations of successes and failures.
- Engagement formalization with a target to cover 100% of the property and/or facility managers involved in managing the assets and 100% of the main service providers in compliance with SRI Label.<sup>2</sup>
- o Contribution to the improvement of their ESG practices.
- o Various reports related to ESG topic.

<sup>&</sup>lt;sup>2</sup> Please note: GF PIERRE Fund will strive to achieve full coverage, while actual engagement may vary based on the willingness and cooperation of all parties. involved.



The ESG Function is composed of GRE SGR ESG manager working closely with GF Pierre Fund Manager and the relevant ESG, Transaction, Asset management and Property Management team of GRE SPA.

#### 3. Stakeholder Identification

GRE SGR pays particular attention to the relationships established with its various stakeholders and ensures that their expectations, in particular in terms of ESG policy, are considered. In order to present the main stakeholders, Generali Group developed a stakeholders' map.

The map includes the main categories of stakeholders - both internal and external to the Group. In particular, we considered stakeholders for whom the Group has responsibility, as well as those that can influence performance. Their proximity, significance and authority were also considered.



For each group of stakeholders there are listed the main channels for listening and dialogue, mapping the activities carried out by various corporate departments with the aim of understanding needs and expectations, communicating the results achieved and programs promoted to ensure sustainable development. Responsibility for the relationship with the various stakeholders is widespread throughout the entire Group and it is an element that requires constant monitoring as part of our day-to-day activities.

#### Employees:

- Engagement survey every two years;
- o Individual performance assessment interviews and sharing of career development goals;
- Meetings with trade unions and workers' representatives;
- o Engagement activities connected with business ethics and reflection on the company culture;
- Corporate volunteering;
- o Intranet and Group portal.

#### Clients:

- o Brand surveys and surveys to monitor satisfaction levels;
- Market research;
- Dialogue with consumer associations;



Communication channels dedicated to clients (web, chat, email and freephone number).

#### Distributors:

- Satisfaction surveys;
- Roadshows with sales networks;
- National and local meetings and conventions;
- Workshops:
- o Channels of communication dedicated to agents and distributors (web, chat and email).

#### Contractual partners:

- National and local meetings and conventions;
- Workshops;
- o Communication channels dedicated to suppliers (web, email).

#### Financial community:

- Annual General Meetings;
- Meetings and interviews with analysts, investors and proxy advisors;
- o Interviews on the relevance of material issues;
- Company points of contact dedicated to financial investor relations;
- o Policy for the management of engagement between the Board of Directors and investors.

#### Community:

- Participation in multi-stakeholder meetings to promote the sustainability of the business;
- Meetings with representatives of NGOs, institutions, and civil society associations;
- Interviews on the relevance of material issues;
- Press conferences;
- Web and app for mobile devices;
- Company points of contact dedicated to relations with the media and institutions;
- Joining voluntary initiatives supported by the United Nations;
- Contributing to public consultations to define new legal measures and industry regulations.

#### **Environment:**

- o Participation in multi-stakeholder meetings to promote the sustainability of the business;
- Meetings with representatives of NGOs, institutions, and civil society associations;
- Interviews on the relevance of material issues;
- We join voluntary initiatives supported by the United Nations.

#### 4. Real Estate Field

The interaction between GRE SGR and its stakeholders is based on its historical involvement with stakeholders in the sector. For the purpose of the SRI Policy, the key stakeholders for Real Estate are grouped into the following categories: Property Managers, Facility Managers, the main service providers (developers, project management, delegated project contracting only) and tenants.

The following table lists the stakeholders with which GF Pierre fund maintains relations, their expectations, the main channels for listening and dialogue, as well as the actions taken to meet the expectations identified.

Stakeholder	Engagement
Property Managers	ESG charter: engagement formalization with a target to cover 100% of the property and/or facility managers involved in managing the assets and 100% of the main service providers <sup>3</sup> .

<sup>&</sup>lt;sup>3</sup> Please note: GF PIERRE will strive to achieve full coverage, while actual engagement may vary based on the willingness and cooperation of all parties involved.



Facility Managers	This commitment is monitored by the ESG manager, the Fund Management team, the Sustainable Investing team, Asset Management team and by the Property Management team, in close collaboration with the stakeholders.
The main service providers (developers, project management, delegated project contracting only)	
Tenants	Tenant engagement: where possible, for new commercial assets located in France with tenants occupying over 1,000 m², a green lease is signed The green lease includes clauses aimed at monitoring energy consumptions in order to improve assets environmental performance.  Regular meeting and discussions are held between tenants and
	asset manager and property manager team to discuss tenants' expectations and requests.
	Whenever feasible, a tenant satisfaction survey is distributed annually to occupants, taking into account the limitations associated with certain asset classes or property characteristics.

## 5. Stakeholder Engagement Charter

The GF Pierre fund ESG charter, document in which GRE SGR explains to suppliers/contractors its approach on the most important social and environmental topics, and to explain them the Group's rules of conduct in these fields, is intended for Property Managers, Facility Managers and the main Service Providers, but it can be shared with other stakeholders to evaluate working relationships. The purpose of this Charter is to support the implementation of the guidelines set out below, which our stakeholders should follow. It is part of a committed and responsible approach and aims to be a vector of progress and innovation for everyone. The target is to sign 100% of this charter with 100% of property manager, facility manager and the main service providers<sup>2</sup>.

GRE SGR requires its contract partners, including the stakeholders mentioned, to align with its policies while performing business and to ensure compliance with all the levels of the relevant supply chain.

With this charter, GRE SGR and its stakeholders will respect fundamental human rights by complying with the following obligations (extracted from the principles of the United Nations Global Compact, the Principles for Responsible Investment and the Carbon Disclosure Project):

#### 1. Correctness and honesty

GRE SGR works in compliance with the current legislation, professional ethics and internal rules. GRE SGR does not accept any form of corruption, extortion, or misappropriation.

#### 2. Transparency and impartiality

The stakeholders are selected by means of clear, transparent, reliable and non-discriminatory procedures, by solely using objective, documentable, and transparent criteria.

GRE SGR is committed to promptly giving all stakeholders and potential stakeholders access to the information needed to identify the goods and services to be provided, and to any changes or additions to supply/contract specifications.

#### 3. Avoiding conflict of interests

Relations between GRE SGR and its stakeholders are governed by objective criteria. Under no circumstances shall the personal relations or interests of employees influence the award of a contract or an order. No employee can directly or indirectly draw any personal benefit from the award of a procurement contract. Consequently, any benefit or present given or received that may be intended as a tool influencing the independent judgment or conduct of the parties involved shall be forbidden.



#### 4. Fair competition

GRE SGR shall promote fair and equitable competition among its stakeholders, which is intended as a tool to select the best GRE SGR stakeholders and to improve the quality of the purchased goods and services under satisfactory contract terms. In its relations with stakeholders GRE SGR shall comply with the sustainability principle. It shall therefore behave as impartially as possible and shall not abuse its dominant position. It shall also attach primary importance not to promote the creation or continuation of dominant positions or economic dependence of stakeholders.

#### 5. Confidentiality

GRE SGR shall keep stakeholders' information confidential and shall refrain from looking for confidential data, unless it is explicitly authorized to do so in compliance with the regulations in force.

GRE SGR employees are forbidden to use confidential information provided by stakeholders for any purpose which is not related to the performance of their duties.

#### 6. Workers protection

Stakeholders shall operate in line with the principles stated in this document. They shall strictly comply with all national and international applicable rules and regulations, including the Fundamental ILO Conventions, the UN Universal Declaration of Human Rights, and the rules and standards of the relevant business sectors.

In particular, stakeholders shall acknowledge the rights of their employees and treat them with dignity and respect. They shall be committed to:

- o **not using nor tolerating the use** of child, forced, obliged or undeclared labor;
- not implementing nor tolerating any form of discrimination based on nationality, gender, racial and ethnical origins, religious beliefs, political opinions, age, sexuality, disability or health in recruitment and remuneration policies, access to training, career development, dismissal or staff retirement;
- o **granting** the staff the right to set up and join trade union organizations of their own choice and to hold collective negotiations with the company in line with the rules, practices and cultures of the various countries;
- ensuring a safe and healthy working environment and adopting suitable measures to prevent any accident or damage to workers' health;
- complying with the laws and standards applicable in the relevant business sector on working hours and public holidays;
- o **respecting** the staff's right to decent remuneration;
- providing suitable staff training.

#### 7. Environmental protection

GRE SGR also requires its stakeholders to promote environmental safeguard by minimizing the impact of their business through an efficient use of natural resources, preference to renewable energy, correct waste disposal and greenhouse gases reduction.

Compliance with stakeholders' requirements shall be ensured by means of suitable monitoring procedures, that will also have to take account of the risk profiles of the different stakeholders' categories.

In the event of non-compliance with the above-mentioned principles, GRE SGR shall first and foremost seek a solution with the stakeholder through dialogue. Should an agreement fail to be achieved, or serious non-compliance occur, GRE SGR shall apply the necessary sanctions that may go as far as the termination of the contract.

The engagement with the stakeholders is monitored and managed by the GRE SGR ESG manager working closely with GF Pierre Fund manager and the relevant ESG, Transaction, Asset management and Property management team of GRE SPA. Every year, our stakeholder engagement activities are monitored and shared in the GF Pierre annual report.