

## WHISTLEBLOWING POLICY STATEMENT

Generali Fund Solutions (“**GFS**” or the “**Company**”) is committed to conducting its business in line with the ethical standards and all applicable laws, rules and regulations. To report any violations of Luxembourg Law, European Union law or of the Code of Conduct, the Company provides a dedicated reporting channel ensuring maximum security and confidentiality of information through an encryption protocol, available at the following link: <https://generali.whispli.com/speakup>. Through this channel, both written and oral reports can be submitted, either anonymously or with identification, including through dedicated phone lines. Concerns reported via the Group Whistleblowing Helpline will be automatically assigned to the relevant Compliance Officer in line with GFS Whistleblowing Policy.

Reports may also be submitted through the other official reporting channels made available by the Company, namely by contacting the GFS Compliance Officer, the Generali Investments Holding S.p.A. (“**GIH**”) Chief Compliance Officer, or the Generali Group Chief Compliance Officer Function (Group Ethics & Investigation structure) as follows:

- By post to the GFS Compliance Officer – Generali Fund Solutions, 4 rue Jean Monnet, L-2180 Luxembourg – G.D. Luxembourg;
- By post to the GIH Compliance Officer - Generali Investments Holding, Piazza Tre Torri 1, 20145 Milano / Italy;
- By post to the Group Chief Compliance Officer – Group Ethics & Investigations – V. Machiavelli 3, 34132 Trieste, Italy. Concerns reported by post will be assigned to the relevant Compliance Officer in line with GFS Whistleblowing Policy.

Through any of these channels, it is also possible to request a meeting with the Compliance Function, which oversees the reporting mechanisms and is responsible for managing and following up on the reports received. Reports must concern negligent, unlawful, irregular, or improper circumstances or conduct that are reasonably suspected or have been identified while performing one’s duties. The facts relating to the alleged violation must be described as clearly and comprehensively as possible to facilitate the initiation of investigative activities. Reports must not concern disputes, claims, or requests linked to personal interests relating to individual employment relationships - such as labor disputes or interpersonal conflicts between the reporting person and another employee. The reporting channels must also not be used for communications unrelated to their purpose, for which the appropriate dedicated contact points (e.g., complaints) are available. As established by Legislative Decree 24/2023 (Whistleblowing), the Company does not tolerate any form of retaliation against anyone who makes a report in good faith or participates in an investigation related to it. The Company guarantees - within the limits of the law - the protection of the identity of the reporting person, the reported person, and any other individuals involved, as well as the maximum confidentiality of the information contained in the report.