



# CODE OF ETHICS







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# INTRODUCTION





The Code of Ethics applies to all the Companies of Reale Group and has the objective of directing those who work with and for the Group towards conducts that are correct, loyal and coherent with the culture and values pursued by the Group itself.

Through the Code of Ethics, Reale Group is committed to operating in compliance with all the values and principles of civil society, including that of legality, which is fully supported by compliance with all primary and secondary regulations in force in the countries and markets in which the Companies belonging to the Group operate.





**PART ONE**  
IDENTITY AND VALUES

# Vision

Reale Group develops its activities in line with its Values and Principles, which guide the actions undertaken and structure the way in which the Group Companies operate.

# Mission

Reale Group's Mission, pursued in compliance with its Values and Principles, is to guarantee quality and certainty of services for Members/Policyholders-Clients, maintaining, over time, its continuity and independence, thanks to a healthy and prudent economic management that generates value and positive impacts for the community and the environment.

# Charter of Values

## **INTEGRITY**

Reale Group pursues its objectives with fairness, seriousness, transparency and reliability, in full compliance with the rules and professional ethics.

The Group's image is characterised by a particular commitment to ethical behaviour, addressed to all stakeholders.

## **CENTRALITY OF INDIVIDUALS**

Reale Group acknowledges that people play a central role in all its strategic choices and in its organisational, commercial and investment processes.

Every person who comes into contact with the Group is given consideration, attention and protection.

## **RESPONSIBILITY**

Reale Group acts in the marketplace and towards its stakeholders by professionally pursuing the continuity of results,

taking responsibility for its actions and decisions, managing their impact on the community and the environment, and implementing the necessary measures to avoid misconduct and negative consequences. This approach also considers transparent and reliable reporting of its activities as an unavoidable expression of sustainability.

## COHESION

The achievement of the objectives to be reached requires a high level of strategic sharing and synergic collaboration between Group companies. Adopting an overall vision aimed at creating value means making the best use of the skills of each individual, strengthening the ability to interact and “to be a Group” in the various operational situations, making common objectives prevail.

## INNOVATION

Reale Group adopts innovative behavioural models, aimed at anticipating changes and new market needs. To this end, it considers skills, the quality of processes and the technological factor as preferential tools for continuous improvement and the development of new strategies.

# Principles

## MUTUALITÀ E SOSTENIBILITÀ

**Mutuality** is the principle that guides the Parent Company Reale Mutua, consolidates the values of the Group and inspires the actions of all its Companies, highlighting the essence and distinctiveness on the market in terms of reliability, seriousness, quality of service and ability to best interpret the needs of clients and the territory.

By operating in constant observation of the principle of Mutuality, Reale Mutua stands out on the market by the absence of a reference shareholder and, therefore, by its independence.

You become a member of the Mutual Insurance Company by subscribing to an insurance contract, and not to shares in the share capital (which does not exist), and one ceases to be a member with the termination of the insurance

relationship; participation in the company, therefore, is not linked to the contribution of goods or services, but to the payment of periodic contributions (the premiums) commensurate with the risk. In short, in “pure” mutual organisations like Reale, all members are policyholders and all policyholders are members.

In view of the lack of share capital (and participation equity), mutual insurance companies cannot remunerate members' investments by distributing dividends; for this reason, the management of a mutual insurance company, without prejudice to the need to keep its capital solidity constant (since it cannot resort to capital increases), is not primarily aimed at maximising profit, but rather at constantly improving the quality of the service and the relationship with the member/customer.

Notwithstanding the aforesaid, Mutual Insurers, in order to guarantee the quality of the relationship with their members, may however assign to their policyholder members the so-called mutuality benefits, that is, economic advantages, connected precisely to the existence of an exchange relationship between the mutual insurer and the member, which guarantee them better opportunities compared to those they might obtain on the market.

Although the individual Group Companies are subject to the coordination and guidance of the Parent Company, which holds all or a significant portion of their capital, they enjoy operational autonomy in order to pursue their objectives in the general interest, avoiding any type of conflict of interest.

The objective of maintaining full autonomy and independence from external control and capitalisation centres makes the continuous evolution of the risk management system central to the Group's strategy, as a fundamental element for the continuity and development of each Company of the Group.

Attention to the Member/Policyholder is linked to social responsibility commitments towards the environment and the community, which have inspired Reale Mutua since its foundation.

In fact, the principle of mutuality has always been accompanied in Reale Group by the principle of **sustainability** as

a driving force of its values, mutual identity and Social Responsibility; the sustainable development objectives of the United Nations' 2030 Agenda guide the Group's sustainable strategy, which is increasingly integrated ex ante into business processes.

Reale Group is committed to mitigating the environmental impacts of its activities with a view to safeguarding the ecosystem, adopting risk management, pollution prevention and environmental protection policies, not only honouring its obligations to comply with legislation, but also committing to constantly improve its environmental impact.

The Group selects its investments by integrating financial, social, environmental and governance (ESG) considerations, aware that this strategy not only generates a concrete impact on the community and contributes to a more sustainable development, but also favours the pursuit of positive financial results in the long term.

The use of technological and digital solutions is used to improve the quality and well-being of individuals and the community, always with a view to caring for people.

Reale Group Companies pursue a balanced development of the business in its various components and the preservation of a high level of capitalization; sustainability is an integral part of both remuneration policies, which are based on healthy, fair and transparent remuneration mechanisms, and of the Product Governance that inspires and guides the offer of products and services to Members/Policyholders-Clients.

Constant, accurate and transparent reporting on the actions carried out by Group companies and the results achieved in economic, financial, social and environmental terms is aimed not only at providing information to Stakeholders, but also at involving them in a useful and constructive debate, protecting and enhancing the Group's reputation.

# Stakeholders

Group companies are committed to ensuring respect and attention for all stakeholders, pursuing sustainable development over time as a factor in the choice and direction of their actions.

Reale Group has identified the following main categories of stakeholders, understood as being those *“individuals, groups of individuals or entities that influence or are influenced by the Group, its activities and the impact these generate in economic, financial, social and environmental terms”*.









**PART TWO**  
RULES OF CONDUCT

## **1. OBLIGATIONS OF CONDUCT TOWARDS MEMBERS/POLICYHOLDERS/CLIENTS**

The Companies of Reale Group operate, also in coordination with their own Intermediaries and other distribution channels, with diligence, correctness and transparency towards Members/Policyholders-Clients, organising themselves in such a way as to:

- identify and avoid conflicts of interest where this is reasonably possible and, in situations of conflict, act in such a way as to allow Shareholders/Policyholders-Clients the necessary transparency about possible adverse effects and in any case manage conflicts of interest in such a way as to exclude that they are detrimental to them;
- acquire the information necessary to assess the insurance and pension needs of Members/Policyholders-Clients and operate in such a way that they are always adequately informed;
- create and distribute insurance products that best meet the demands of its Members/Policyholders-Customers;
- to achieve independent, sound and prudent financial management and to take appropriate measures to safeguard the rights of Members/Policyholders-Clients.

## **2. RELATIONS WITH SHAREHOLDERS OF SUBSIDIARIES**

The Parent Company Reale Mutua is, in most cases, also the main reference shareholder of all the Subsidiaries.

Reale Group promotes transparency and periodic information to shareholders, with specific regard to minority shareholders, in compliance with the laws and regulations in force. The interests of all shareholders are promoted and protected by refusing any particular or partisan interest, in a common view of prudent management aimed at ensuring sustainability over time. Furthermore, the Group encourages the informed and conscious participation of shareholders in corporate decisions, the regular functioning of shareholders' meetings in compliance with the right of each shareholder to obtain clarifications, express their opinion and make proposals. Relations with shareholders are entrusted to the Group structures in charge of managing relations with third parties.

### **3. OBLIGATIONS OF INTERMEDIARIES AND OTHER DISTRIBUTION CHANNELS**

Reale Group companies operate on the market through intermediaries and other distribution channels, which are required to pursue high levels of excellence in their activities, focusing on listening, understanding the needs and involving Members/Policyholders-Clients.

This implies that Intermediaries and other distribution channels provide Members/Policyholders-Clients with complete and truthful information on the products and services offered, in order to guarantee their adequacy with respect to the needs that have arisen, and avoid situations of conflict of interest.

Transparency, fairness, efficiency, professionalism and compliance with the obligations arising from the contracts signed, as well as any other applicable legislation, guide the work of the Intermediaries, aimed at meeting the expectations of Members/Policyholders-Clients.

### **4. RULES OF CONDUCT IN RELATIONS WITH EMPLOYEES**

#### **Selection criteria and progress**

It is the primary objective of Group companies to recruit and retain qualified personnel. Selection, recruitment and career development are based exclusively on objective assessments of the qualifications needed for the tasks to be carried out, without any discrimination as to sex, religion, country of origin, skin colour, age, political opinions, membership of associations, social and personal conditions, whilst seeking the most suitable position for those with disabilities. The organisational structure is flexible and encourages Employees' initiatives, offering them opportunities for personal and professional development.

#### **Transparency in the employment relationship**

Group Companies undertake to ensure that, at the start of the employment relationship, Employees receive complete and transparent information on the skills and abilities required for employment (in accordance with the procedures provided for by law and collective labour agreements), the characteristics of the tasks to be performed, rules of conduct,

organisational position and related economic treatment. Group companies apply the National Collective Agreements and the Supplementary Company Agreements or Contracts to all Employees, assigning the remuneration and benefits provided for by contract.

### **Involvement in the achievement of corporate objectives**

The Companies of the Group are committed to promoting the participation of Employees in the achievement of corporate objectives, so as to facilitate the assumption of responsibility, also through the use of delegation, and favouring observations aimed at improving the functionality and quality of work. These objectives are achieved thanks to the decisive and fundamental contribution of every employee at every level. Managers periodically inform their resources on the Group's performance and strategies.

### **Circulation of information**

The Group promotes the correct and punctual circulation of information useful for each employee's execution of activities, through the appropriate internal communication structures and tools intended for this purpose.

### **Refresher and training**

Group companies, by investing in training and refresher courses, aim to enhance and increase the skills, expertise and professionalism of each Employee.

### **Working environment and health protection**

The protection of the physical integrity of Employees is of paramount importance.

The Companies of the Group guarantee a healthy, safe and efficient working environment, in compliance with the regulations in force. Each Employee must contribute to its achievement and maintenance. In the event of health, socio-political or other emergencies, the Group will work diligently and in an integrated manner to create working conditions aimed at employee safety.

### **Inclusion and equal opportunities**

Group companies promote and support a culture of equal opportunities, enhancing the value of their resources in a spirit consistent with corporate values and with the changes deriving from the organisational evolution. Furthermore, they implement human resource policies free from discrimination and prejudice. Group companies provide Employees with benefits, as set out in contracts or supplementary company agreements, aimed at facilitating the reconciliation of family and work time, supporting the income of Employees, guaranteeing forms of social security and assistance in addition to the public system, promoting prevention and health care for Employees and their families.

### **Interpersonal relations**

Within Reale Group, each Employee shall behave with fairness, loyalty and professionalism towards all persons with whom they come into contact during the performance of their duties. Behaviour in the workplace shall be based on the utmost respect for the dignity and personality of each individual; harassment and behaviour that is offensive or harmful to one's personal and professional dignity shall not be tolerated.

## **5. RULES OF CONDUCT FOR MEMBERS OF CORPORATE BODIES**

### **Role of Directors**

The Directors of the Companies of Reale Group, embracing all the principles contained in the Code of Ethics, are the guarantors of its effective application and compliance. As the expression of the individual assemblies, they play a fundamental strategic and organisational role. In the Corporate Bodies of which they are members, they pursue the interests of the Group and draw inspiration for their actions from the values of integrity and responsibility.

### **Objectivity, impartiality and transparency in decisions**

The members of the Corporate Bodies of the Companies of the Group are committed to pursuing the general interest, in compliance with specific procedures for the traceability of decisions and reporting mechanisms adopted. Reale Group provides Corporate Bodies with all information necessary to ensure adequate decision-making processes, based on objectivity, impartiality and transparency.

### **Autonomy and independence**

Directors shall avoid situations of conflict of interest, even if only apparent or potential, with the Companies of the Group. When there are direct or indirect personal interests in the matters subject to resolution, the Directors undertake to declare them before making the determination and shall comply with the procedures established on the matter.

### **Confidentiality obligations**

In the performance of their duties, the Directors shall safeguard the confidentiality of information and shall refrain from using confidential information acquired in the performance of their duties for any purpose inconsistent with their duties or for the benefit of themselves or others.

### **Training**

The Administrative Bodies guarantee constant professional updating, also for their own members, through the development of training plans, aimed both at ensuring the suitability of the necessary and useful technical skills to fulfil their role, based on the nature, complexity and importance of the tasks assigned, and at consolidating knowledge over time.

### **Performance assessment**

The Administrative Bodies are involved in an assessment process that impacts all aspects concerning the size, composition and functioning of the individual body as a whole and its committees. They express indications on the professional figures whose presence on the Board of Directors is considered appropriate and take corrective actions to improve any criticalities found related to the operations and risk profile of the company.

## **6. RULES OF CONDUCT IN RELATIONS WITH SUPPLIERS OF GOODS AND SERVICES**

The relationship with Suppliers of goods and services is based on the observation of professional ethics and ethical rules, which are expressed primarily by having reviewed Reale Group's Code of Ethics in view of a conscious alignment to its indications, so that the principles and values of the Code of Ethics are enforced onto the Suppliers of goods and services including their personnel, and also those working within Companies of Reale Group.



In the criteria for selection and evaluation of Suppliers of goods and services, Reale Group follows precise rules, which guide the identification of the specifications of the goods or services to be purchased, the use of procedures for access to the market to avoid conflicts of interest, the definition of objective selection criteria, compliance with agreements and absolute independence in the relationship between the parties.

The Group's Suppliers of goods and services must adhere to the Suppliers' Code of Conduct, which defines the rules of conduct that must be adopted in managing commercial relations with the Group.

### **Providers of professional services (Fiduciaries)**

In the selection of its Suppliers of professional services (Fiduciaries), Reale Group selects and evaluates the professionals who perform their duties not only based on competence, but also on compliance with ethical standards, with a specific attention to the duties of loyalty, fairness, fidelity, diligence, secrecy, confidentiality and compliance with mandatory rules.

This choice is also based on criteria of acceptance and compliance with contractual rules and internal procedures. Especially in the area of claims management, Group companies rely on professionals who operate according to criteria of congruity with economic parameters, thus avoiding operating methods and assessments that would increase conflict rather than resolving it with a view to providing a better service.

### **Socially relevant behaviour**

In line with the values set out in the Code of Ethics, and in accordance with the Code of Conduct for Suppliers, the Group undertakes to prefer those Suppliers of goods and services that responsibly manage their environmental and social impacts, protect the rights of their workers and promote these issues also among their subcontractors.

### **Separation of roles**

The separation of roles, in the different operational and decision-making phases of the purchasing process, is the main management tool to ensure fairness, transparency and control in the relationship with suppliers of goods and services,

thus preventing conditions of individual advantage in their execution.

The responsibility of the person who defines the characteristics of the products or services to be purchased is separate from the responsibility of the person who initiates, negotiates and concludes and contracts the commercial negotiations with the Suppliers of goods and services.

## **7. GENERAL RULES OF CONDUCT**

### **Protection of corporate assets and reputation**

Group companies are committed to safeguarding the company's assets by means of sound and prudent management and strict compliance with the law and the relevant company regulations.

All staff are committed to safeguarding corporate assets.

All personnel are required to preserve the reputational heritage of the Group's Companies, conforming their activities, including relations with stakeholders, to the strictest compliance with the law and with the values and principles referred to in this Code of Ethics.

### **Conflicts of interest**

Conflicts of interest are circumstances under which:

- the interests of the Companies of the Group could be potentially damaged to the advantage of members of the Administrative and Control Bodies, of Employees and/or Collaborators, or to the advantage of a third party;
- the interest of a Member/Policyholder-Client of the Companies of the Group could be potentially damaged to the advantage of members of the Administrative and Control Bodies, of Employees and/or Collaborators, to the advantage of another Member/Policyholder-Client or of the Companies belonging to Reale Group;
- the personal interest of each Employee may be in a situation of conflict with the interests of the Companies;
- the interest of the Shareholders could be in conflict with the interest of the Companies of the Group.

Conflicts of interest must be avoided and, where this is not possible, managed in such a way that they do not cause any harm to companies of the Group and Members/Policyholders-Clients.

Employees and subjects collaborating with the Companies of the Group, as well as the members of Top Management and of Administrative and Control Bodies, are committed, in compliance with the values and principles of the Code of Ethics, to avoid and report actual and potential conflicts of interest.

Furthermore, employees may not, without consent, work and/or undertake assignments in favour of third parties, including non-competitors.

The regulations of the Companies of the Group provide for specific procedures allowing the timely identification of cases of conflicts of interest and their management by the persons in charge of the processes and the functions identified for this purpose, without prejudice to the liabilities of persons who violate the relevant legal provisions.

### **Compliance with competition law**

Reale Group acknowledges amongst its fundamental values free competition between companies and full compliance with competition and antitrust legislation.

Any practice or behaviour likely to restrict free and fair competition is prohibited.

Personnel must be aware of competition and antitrust regulations and, in relations with competitors, must promptly consult the competent company functions, so as to enable compliance with the regulations.

Where appropriate, regarding the activity carried out and the characteristics of each company, Group companies adopt an adequate system of rules aimed at ensuring full compliance with competition law.

### **Right to confidentiality and data protection**

The Group recognises the priority of respecting the confidentiality of data, as regulated by privacy legislation. All necessary measures are taken to protect the information acquired, refraining from disclosing it to unauthorised third parties. In particular, high security profiles are adopted to ensure that the data collected are only processed for the purposes necessary to carry out the activities that have justified their acquisition.

Confidential information shall be treated with the utmost discretion; access shall be limited exclusively to specifically authorised persons who need to know it for work-related reasons, refraining from any declaration in a public place or

in the presence of third parties. Personal information on Employees is collected and processed within the framework of the purposes envisaged for the management of the employment relationship and for reasons strictly related to the execution of activities.

Intermediaries, in the framework of the activities they carry out on behalf of one of the companies of Reale Group as the maintainer, also operate in compliance with the rules of confidentiality, in accordance with the provisions of the data protection regulations and the internal procedures of the companies of Reale Group.

### **Use of new technologies and artificial intelligence in data processing**

When using new technologies and artificial intelligence, with specific reference to data processing, Group companies are committed to respecting individual rights, the law and regulations on privacy and information security.

### **Fighting corruption**

In relations with the multitude of Stakeholders and, especially, with representatives of Bodies and Public Administrations, Supervisory Authorities, Associations, Political and Trade union organizations, Reale Group maintains a conduct inspired by the utmost fairness, professionalism and impartiality, acting in compliance with all the primary and secondary regulations issued by the Authorities of the countries in which it operates, as well as avoiding attitudes that may suggest the intention to influence the decisions of the counterparty or to request favourable treatment. Group companies adopt specific organisation, management and control models in compliance with the regulations of the countries in which they operate, aimed at preventing risks arising from the committing of crimes, thus safeguarding the interests of the Companies themselves and their Stakeholders. The Group does not make contributions of any kind to political parties or candidates in elections, refraining from any undue form of pressure towards public representatives.

### **Anti-money laundering, anti-terrorism and international sanctions**

The Companies of the Group do not allow the use of their own or third parties' resources for money laundering purposes or for any activity intended to achieve criminal, terrorist or subversive objectives.

The development of appropriate procedures, in compliance with the obligations imposed by anti-money laundering legislation, allows Reale Group to carry out an effective activity of prevention and repression of crimes connected to such

purposes. To this end, the Intermediaries of the insurance and banking Companies of the Group, in the exercise of their activity, protect themselves against the risk of money laundering and financing terrorism, following the company rules and regulations, as well as the rules of conduct referred to in the contracts/collaboration agreements; furthermore, the Intermediaries and the other distribution channels adopt conducts inspired by the principles of transparency, correctness and active collaboration with the principal Company.





**PART THREE**

IMPLEMENTATION,  
CONTROL AND  
DISSEMINATION

# Implementation and control

The Companies of the Group have defined their own system of internal rules, so that anyone involved in the company's activities may have the appropriate indications to carry out their tasks. In the context of this System, the Code of Ethics has the role of a guiding document that regulates actions and behaviour, both within Reale Group (Employees, Intermediaries, etc.) and outside (all those who have relations with the Group).

Moreover, the Group's Companies have set up a system of internal controls and risk management, aimed at ensuring the proper functioning and good performance of each Company, also in order to promote compliance with the values of the Code of Ethics, to pursue operational correctness, as well as to prevent violations of the law.

The Code of Ethics may be updated due to the economic, financial and commercial evolution of the Group, as well as to changes in the social context and the types of violations found as a result of the supervisory activities. This Code of Ethics, and any update, is approved by the Parent Company's Board of Directors and ratified by each Group Company.

In addition, the Companies of the Group have adopted their own organisational models for the prevention of criminal liability of legal persons, approved by their respective Boards of Directors, drawn up on the basis of the regulations of the countries in which Reale Group operates; the Boards of Directors have assigned to the Supervisory Bodies of each Company of the Group the task of monitoring both compliance with the models themselves and with the principles and values contained in the Code of Ethics and any reports of violations.

More specifically, the Supervisory Bodies:

- are put in place to protect the report handling system, in order to ensure impartiality and independence of judgement;
- are informed annually of compliance with the principles and values contained in the Code of Ethics and of any reports of violations, at the meetings of the Bodies themselves;
- report to their respective Boards of Directors, when presenting the activities carried out by the Bodies themselves, both on the observation of ethical principles within each company and on any violations of the Code of Ethics;
- in case of violation of the Code of Ethics and of the organisation, management and control models by one or more



Boards of Directors of a Group Company, they shall inform the entire Board of Directors and its Board of Statutory Auditors, which shall take the appropriate initiatives in agreement with the competent corporate bodies.

In addition, if necessary, the Internal Audit and Compliance departments and the other control departments can discuss any reports received, anomalies detected and non-compliances deemed to be serious, as well as the subsequent adjustment and control actions carried out.

All personnel, at all levels, is required to respect and know the company regulations and each structure of Reale Group must monitor and ensure the adherence of its actions to the values and principles of this Code of Ethics. Each department is in fact responsible for the execution of controls in its area of responsibility, the detection of non-compliances that may have occurred within the department and their reporting according to the procedures indicated in the violation report management system.

The aim of the latter is to implement the principles on which the actions of Group companies are based, to protect the interests of stakeholders and, lastly, to strengthen existing internal control and risk management systems.

Each Company of Reale Group defines, in accordance with current regulations, appropriate channels of communication (computer platform dedicated to the so-called <whistleblowing>, electronic mail and traditional mail) to report any violation, or suspected violation, or failure to comply with the Code of Ethics, laws and internal regulations. Reale Group guarantees the confidentiality of the authors of the reports and, in any case, protects them from any form of retaliation, without prejudice to legal obligations and the protection of the rights of the Company or third parties, including those who, for various reasons, work in the Companies of the Group. In order to ascertain any violations, each person is required to cooperate in carrying out the activities entrusted to them, ensuring that the appointed control functions have free access to all the documentation considered useful for this purpose, guaranteeing maximum confidentiality in carrying out their activities.

In the event of ascertainment of any violations of the Code of Ethics, of the organisational models for the prevention of criminal liability of legal persons and of internal rules and regulations, the appointed company departments shall take the appropriate measures, in accordance with the provisions of the internal rules and regulations on the system of sanctions for monitoring the models and on the management of reports of violations, and in compliance with the provisions of the law and/or collective agreements.

## Dissemination

The Group's Sustainability and Institutional Communication Department is the contact point for coordinating activities to disseminate the Code of Ethics; it plays a supporting and advisory role for the various corporate structures involved, in order to ensure that policies, products and services are consistent with the Code.

It also cooperates with the appointed structures (Supervisory Bodies, Resources Management, Sales Management, etc.) to promote the development and dissemination of the values of the Code of Ethics to all stakeholders. In order to promote awareness of the ethical standards contained in the Code, periodic training and communication plans are drawn up, using all available tools.



The Code of Ethics of the Companies belonging to Reale Group was approved by resolution of the Board of Directors of Reale Mutua di Assicurazioni on 14 July 2021.

This was followed by ratification by the Administrative Bodies of:

Reale Ites S.r.l., 27 July 2021

Reale Ites ESP, 27 July 2021

Italiana Assicurazioni, 28 July 2021

Reale Immobili, 28 July 2021

Blue Assistance, 29 July 2021

Banca Reale, 29 July 2021

Italnext, 14 September 2021

Reale Seguros Generales, 28 October 2021

Reale Vida, 28 October 2021

Reale Immobili España, 28 October 2021

Reale Chile, 28 October 2021