



Tax Transparency Report

2024

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This document has been translated from that issued in Italy, from the Italian into the English language, solely for the convenience of international readers. The Italian version remains the definitive version.

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Introduction

In 2024, the global economy showed a positive trend marked by solid growth, falling inflation and encouraging equity market performance. The **favourable economic context** was supported by the easing of major central banks' monetary policies and expectations for further interest rate cuts. This context led to an increase in demand for financial advisory and asset management products, particularly from Italian households.

Banca Generali was able to effectively interpret market opportunities, focusing on consistent growth. The Bank's net inflows exceeded 6.6 billion euros, with total client assets managed and administered reaching the important milestone of 103.8 billion euros. These commercial results were accompanied by significant **profitable growth**, with net profit increasing by 32% to 431 million euros and setting an all-time high for the Bank, in terms of both recurring and total components.

In the 2022-2024 three-year period, Banca Generali also successfully completed its **Strategic Plan**, designed to steer the Group along a path of **sustainable** and profitable **growth**, in line with its tradition of excellence.

In keeping with this approach, the Group's **Total Tax Contribution**, calculated as the sum of the taxes borne by the Bank and the taxes collected from third parties on behalf of the general governments, reached approximately **730 million euros** in 2024, up 36% over the previous year. In this regard, Italy is the main source of tax contribution, in line with the breakdown of revenues and the number of employees.

The year 2024 also saw the completion of the Sustainability Statement, drafted in accordance with the Corporate Sustainability Reporting Directive (CSRD). This document highlights the importance that Banca Generali attaches to ESG matters, considering them a priority for steering the strategic decision-making process of its administrative, management and supervisory bodies.

The Bank's sustainable approach is also reflected in its tax management — a fundamental component of corporate governance. The Board of Directors, responsible for tax governance, has defined and approved a **Tax Strategy** based on principles that fully recognise the importance of taxation in the Group's sustainability objectives.

The Tax Transparency Report, now in its third edition, confirms Banca Generali's commitment to transparently and comprehensively disclosing its tax strategy. This document outlines the approach to **tax risk management**, tax compliance and the Group's contribution to the needs of the communities in which it operates. The Report also highlights the Group's active role in promoting **tax transparency** at the international level, as confirmed by the information provided in accordance with GRI 207, the country-by-country report and the exchange of information with the Tax Authorities.

This integrated, transparent approach allows Banca Generali to further strengthen its leading position, confirming its commitment to sustainability and value creation for all of its stakeholders.

1. The Business Model

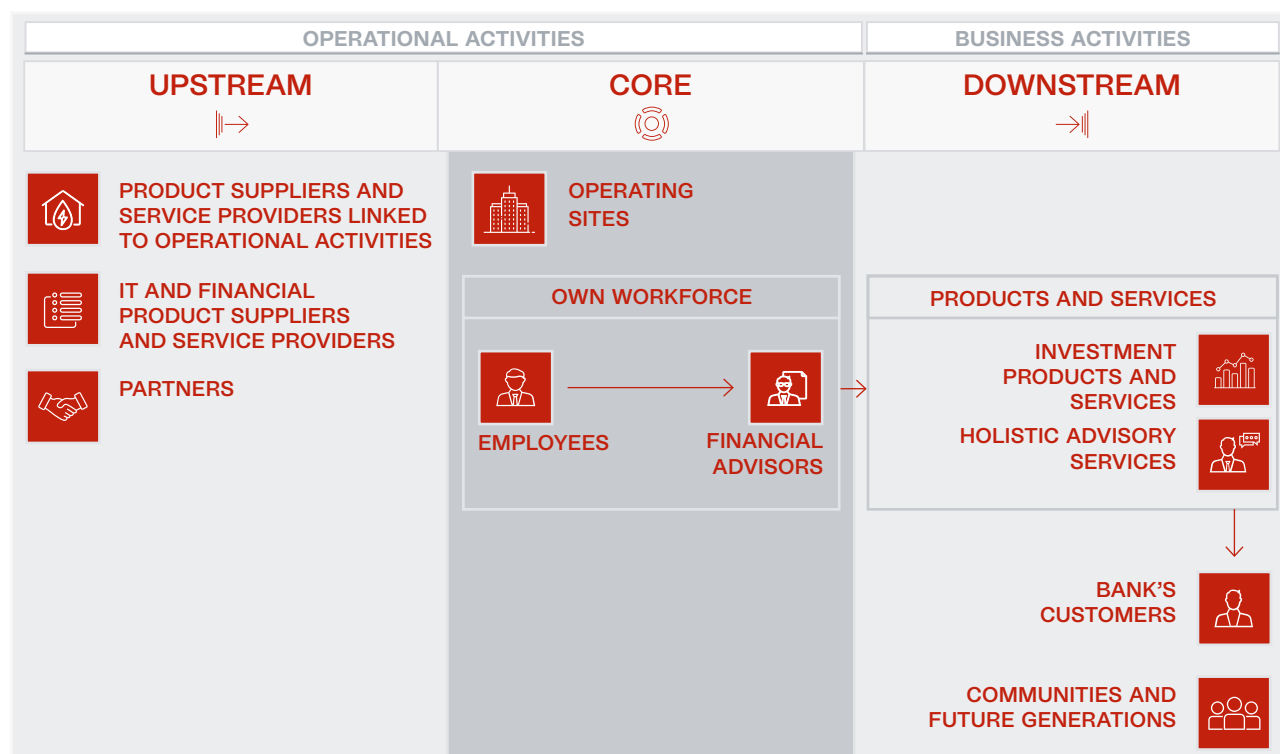
Banca Generali stands apart within the Italian finance sector for the central role played by its **investment services**, and in particular by the **financial advisory** and **wealth planning** services it offers to the **HNW**, **Private** and **Affluent** customer segments.

The structure of Banca Generali's value chain aims at **maximising operational efficiency, constantly innovating and offering a wide range of high-quality services to its Customers**, fully reflecting its mission and vision statements.

Its business model is based on solid partnerships, a highly qualified workforce and a strong commitment towards communities and future generations, all with a focus on efficient resource management (Upstream), ongoing development of workforce and technological innovation (Core) and provision of high-quality services and holistic advisory (Downstream). These elements support the Bank's goal of being a trusted partner for its Customers, while also promoting sustainability and innovation.

The value chain may be divided in three main parts: "**Upstream**", "**Core**", and "**Downstream**".

BUSINESS MODEL



Banca Generali offers:

- > **banking services**, which include a range of bespoke banking accounts and services for customers;
- > **assets under administration**, through advice on the purchase and sale of securities on the secondary and primary markets, in addition to offering the subscription of certificates;
- > **asset management**, thanks to a wide range of mutual funds that benefits from the best solutions of international asset managers;
- > **insurance investments** aimed to protect and personalise investments;
- > **wealth management and trust services**, which offer a wide array of wealth advisory solutions that extend beyond investments to encompass pension planning, corporate finance, real estate and art advisory, protection for future contingencies and challenges relating to generational transfer (family protection).

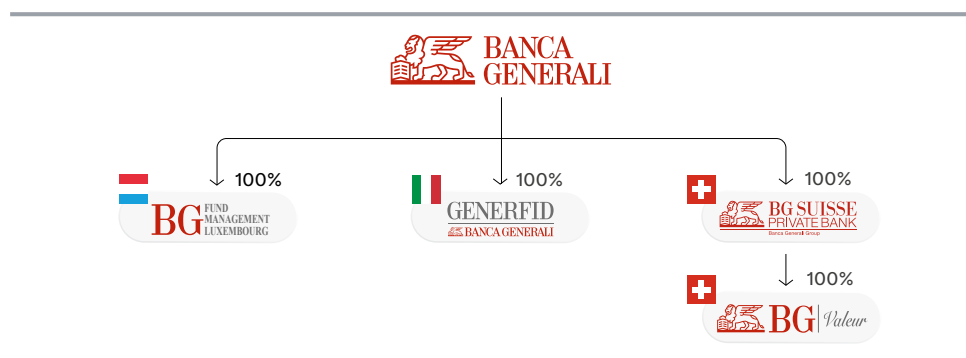
This range has been designed and is offered to customers with the support of a **value chain** consisting of:

- > **partnerships**, selected with the aim of bringing Banca Generali's customers the best specialist services the market has to offer in terms of products, wealth management and technology;
- > **Group companies**, aimed at best serving some specific customer segments: **BG Fund Management Luxembourg S.A.**, which provides in-house funds; **Generfid S.p.A.**, which offers trust services; **BG (Suisse) Private Bank S.A.**, a Swiss bank established in 2021 that, after having obtained the licence to operate under the freedom to provide services in Italy, in 2024 launched a collaboration project with Banca Generali; **BG Valeur**, a boutique financial advisory and asset management firm based in Switzerland that was transferred to BG Suisse in 2024.

The Banca Generali Banking Group's evolution has led to a significant growth in both the Italian and Swiss markets, optimising the Bank's positioning in the private banking and wealth management market segments, and marked the beginning of operations in an increasingly international context, strengthening its global footprint and its ability to meet Customer needs.

In this regard, the acquisition of Intermonte SIM in 2025 allows Banca Generali to strengthen its position in the sector of financial advisory and services to enterprises.

GROUP'S STRUCTURE AT 31 DECEMBER 2024



2. Tax Governance, Control and Risk Management

Within its **organisational** and corporate governance **model**, inspired by a low tax risk appetite, Banca Generali S.p.A. has developed and implemented an **integrated system** for identifying, measuring, **managing and controlling tax risk** (**Tax Control Framework**, hereinafter also “**TCF**”) compliant with the provisions of the Organisation for Economic Co-operation and Development (**OECD**) and the recommendations provided for by **Italian legislation** governing the Cooperative Compliance Program.

Banca Generali’s TCF consists of the following three key elements:

- a) a **tax strategy**, approved by the Board of Directors, setting out the principles for managing the tax variable and the strategic guidelines aimed at ensuring compliance with tax rules;
- b) a **governance** model that applies to: i) roles and responsibilities relating to taxation, and ii) information flows envisaged for managing tax risk addressed to the administrative body (i.e., annual report);
- c) a system for **mapping, controlling, measuring** and **managing tax risk** to ensure the accuracy and correctness of the fulfilment of tax obligations (calculation, payment and tax return) and the monitoring of the interpretative choices made.

The adoption of the TCF was instrumental to Banca Generali S.p.A.’s admission, as of 2020, to the **Cooperative Collaboration Program**, which — thanks to constant preventive dialogue and transparency with the Italian Tax Authority, also guaranteed by the TCF — allows to gain advance certainty on tax risks.

In addition, the Italian Cooperative Collaboration Program has recently undergone significant regulatory changes that have introduced, along with the concept of advance certainty, additional benefits for virtuous taxpayers admitted to the program: (i) the certification of the operational effectiveness of the system for detecting, measuring, managing and controlling tax risk, at least every three years; (ii) the publication by the Italian Ministry of Economy and Finance of the Code of Conduct defining mutual commitments between the Italian Tax Authority and taxpayers, including the timely and comprehensive disclosure of relevant tax risks; (iii) the definition of a memorandum of understanding on the Cooperative Collaboration Program between the Italian Tax Authority and the Italian Finance Police with the aim of coordinating actions supporting tax compliance.

In view of these regulatory developments, Banca Generali has updated its Tax Compliance Policy and its Risk and Control Map so as to endorse:

- › the Code of Conduct for taxpayers admitted to the Cooperative Collaboration Program introduced by the Ministerial Decree of 29 April 2024, subsequently amended by the Ministerial Decree of 3 October 2024;
- › the Guidelines for drafting the TCF governance, published by the Italian Tax Authority on 10 January 2025.

2.1 The Tax Strategy

The tax strategy, approved by the Board of Directors on 23 June 2020, defines Banca Generali’s commitment to operating in accordance with the following principles:

- › **compliance with tax laws** applicable in the countries in which it operates and **responsible tax risk management**, thus putting itself in a position to satisfy the interests of all stakeholders and ensure positive effects on its reputation. Those holding positions of responsibility are expected to act as role models and promote a culture of fair conduct and compliance. In addition, Banca Generali does not propose that its customers, employees or third parties purchase products or conclude transactions that are in conflict with the provisions of the tax system;

- › **prohibition** to engaging in conduct and transactions that translate into merely **artificial constructions**, which do not reflect the business or may reasonably be expected to yield **undue tax advantages**;
- › **transparency** and **propriety** in relations with the Tax Authorities;
- › **pricing** of intercompany transactions on the basis of the **arm's-length principle**, in accordance with the provisions of the OECD Transfer Pricing Guidelines, in pursuit of the aim of aligning, as fairly as possible, transfer conditions and prices with the places in which value is created. Where Banca Generali operates in countries that do not apply the OECD rules, transfer pricing policies will pursue the twofold objective of ensuring that the place in which value is generated coincides with the place of taxation, while also seeking to avoid double deduction, deduction without inclusion or double non-taxation.

In addition, in accordance with the guidelines laid down by the parent company Assicurazioni Generali S.p.A. through the Group's tax strategy, Banca Generali does not artificially use countries with special tax laws (i.e., tax havens) for the sole purpose of lowering the Group's tax burden. Any transactions in privileged tax countries must be justified by economic and/or strategic reasons related to the Group's business. This matter is also governed by Circular "Target Reporting Model DAC 6", which establishes control measures for detecting and reporting any potentially aggressive tax arrangements. As a general rule, Banca Generali refrains from implementing such transactions, while also duly reporting to the Tax Authority any cross-border arrangements subject to disclosure whenever it identifies them.

By **approving** the Bank's tax strategy, and in light of the guidelines laid down by the Group's tax strategy, Banca Generali S.p.A.'s **Board of Directors** assumed the responsibility for ensuring that it is **disseminated** and **applied**, while also performing the specific task of spreading the underlying culture and values.

The tax strategy entered into force from the day after its approval and was published on Banca Generali's corporate website¹.

2.2 The Governance Model

The governance model is defined by the Tax Compliance Policy, which is aligned with the tax strategy and was updated by Banca Generali S.p.A.'s Board of Directors on 9 May 2025.

The implementation of the TCF involved, *inter alia*, the provision of a process control system, which is entrusted to the specifically dedicated position of **Tax Risk Officer (TRO)**. The TRO prepares the yearly Report on the Tax Control Framework, which is presented to the Risk Committee and the Internal Audit and Risk Committee by the TRO on the invitation of the Chief Financial Officer and, through the Committees themselves, to the Board of Directors. The TRO provides the Chief Compliance Office with all the data necessary for preparation of the relevant report, which is also submitted to the corporate bodies for their evaluation within the broader scope of the management of non-compliance risks to which the Bank is exposed.

2.3 The System for Mapping, Controlling, Measuring and Managing Tax Risk

The TCF adopted by Banca Generali is designed to mitigate the **tax non-compliance risk** contained in the related Risk Map, updated and tested by the TRO to provide assurance regarding the internal control system for tax risk. The TRO monitors the release of new tax arrangements that could have an impact on the internal control system to mitigate tax risks. The TRO assesses any need to update the Risk Map. In the event of regulatory changes, the TRO activates the operating functions responsible for the formalisation/updating of corporate processes. The TRO and the Tax OU support the competent operating functions in the assessment of compliance with tax legislation of new processes that have been introduced or amended from time to time. In particular, it is the responsibility of the business functions and central functions to promptly report to the TRO and the Tax OU the processes within their remit that have been newly introduced or have undergone operational changes.

As for risk profiles relating to proper interpretation of tax law (**interpretation risk**), the Rules for

¹ Available on the corporate website www.bancagenerali.com.

Managing Interpretation Risk — appended to the Tax Compliance Policy — lay down a specific identification process for risks underlying ongoing interpretative choices and the related measurement, not only in quantitative terms, but also in qualitative terms, including evaluating the reputational aspects that could damage the Bank if the associated event occurs.

The control measures put in place to manage interpretation risk are designed to monitor, among other non-routine transactions, the localisation of value-creating activities and their alignment with the relevant place of taxation, ensuring oversight of any and all artificial use of jurisdictions and structures aimed at securing a tax advantage or exploiting tax asymmetries. However, it should be noted that such an event is unlikely to occur as the Bank generally refrains from implementing and/or proposing to customers and from offering aggressive tax-planning arrangements subject to DAC6 reporting.

The mitigation of interpretation risk is structured as both an internal decision-making escalation process — depending on the scope of the risk — and activation of preliminary discussions with the Italian Tax Authority on tax risks that exceed the materiality threshold defined in agreement with the said Tax Authority.

Banca Generali's TCF was duly introduced and integrated within the Internal Control and Risk Management System (hereinafter "**ICRMS**"). In light of the regulatory framework in which it operates, the ICRMS acts as a tool to manage the risks that may impact the conditions underpinning the performance of all company activities. Its structure aims to improve profitability, protect capital solidity, ensure compliance with external and internal legislation and codes of conduct, and promote transparency towards the market through oversight of the risks assumed. In accordance with the prudential supervisory provisions set forth in Bank of Italy Circular No. 285 of 2013 (Part I, Title, Chapter 3), the ICRMS oversees, *inter alia*, the risk of non-compliance with tax regulations. In detail, Banca Generali's TCF functions in a manner complementary to the ICRMS by covering tax risk areas not managed by other internal control systems of the Bank and, in particular, mapping the tax compliance risk and managing the tax interpretation risk.

3. Relations with Tax Authorities and Stakeholder Engagement

Banca Generali ensures transparency and propriety in its relations with Tax Authorities and, in general, with all stakeholders.

In order to foster a transparent relationship and a collaborative dialogue with Tax Authorities, the Bank promotes the cooperative compliance programs and adopts transfer pricing documentation rules, in accordance with the provisions of the OECD Transfer Pricing Guidelines.

The approach of openness and transparency towards Tax Authorities is designed to ensure accurate, timely communication. If an error is identified, Banca Generali is committed to proactively providing the relevant explanations and reaching an adequate solution. However, in defence of its company interest and that of its shareholders, Banca Generali deems it legitimate to uphold, including in litigation, a reasonable interpretation of the law, should there be differences of interpretation with the competent Tax Authorities.

Banca Generali continues to adopt an approach based on tax transparency towards all stakeholders, within the framework of broader ESG matters. Within this framework, Banca Generali actively participates in ESG performance assessment initiatives promoted by leading international organisations and entities, receiving excellent ratings from the main ESG ratings agencies (e.g., MSCI, S&P, Sustainalytics and Moody's – Vigeo Eiris), including with regard to tax management parameters.

4. Tax Reporting

In application of the aforementioned tax approach, in this Report Banca Generali provides a clear summary of:

- › key financial and non-financial information for each jurisdiction in which it operates, in line with the layout provided for in the **Country-by-Country Reporting** or **CbCR** in accordance with the GRI 207 standard² (Section 4.2);
- › its **Total Tax Contribution (TTC)** that, **in addition to income taxes**, also includes all the taxes paid by the Group (**people taxes, product taxes, bank taxes**)³. The TTC takes account of both the **taxes borne** by the Company and the **taxes collected** from third parties on behalf of the general governments. The description of Total Tax Contribution is also complemented by the analysis of the main TTC indicators that link taxes paid to several company parameters and by a brief analysis of taxes paid between 2023 and 2024 (Section 4.3).

The **tax reporting** model adopted makes it possible to report the significant contribution made by Banca Generali to the economic and social systems of the various countries in which it operates from an ESG perspective, thereby highlighting the twofold **role played** by the Bank both as “contributor” of taxes (**legal tax liability**) and “collector” of third-party taxes (**legal remittance responsibility**)⁴.

With a view to ESG matters, the World Economic Forum (**WEF**) identified **taxes borne** and **taxes collected** as one of the main indicators and metrics to measure businesses’ contribution to pursuing the SDGs of the United Nations 2030 Agenda (**UN 2030 Agenda**)⁵.

² GRI 207-4 – *Reporting requirements* section – www.globalreporting.org/standards/media/2482/gri-207-tax-2019.pdf. GRI 207 is a reporting standard that considers tax management as an integral part of a company’s sustainability strategy. It is included in a set of standards (GRI standards) developed by the Global Sustainability Standards Board (GSSB), an international not-for-profit organisation aimed at defining a framework to enable all companies to transparently report their economic, environmental and social impacts.

³ Corporate income taxes generally account for a limited portion of government tax revenue: according to the most recent OECD estimates, corporate income taxes make up approximately 12% of the tax revenue of OECD countries (source: “OECD Revenue Statistics 2024 – Health taxes in OECD Countries” – www.oecd.org/tax/tax-policy/revenue-statistics-highlights-brochure.pdf).

⁴ “Legal tax liability, legal remittance responsibility and tax incidence – Three dimensions of business taxation”, OECD Taxation Working Papers, No. 32 – www.oecd-ilibrary.org/docserver/e7ced3ea-en.pdf?expires=1681295169&id=id&accname=guest&checksum=1AA6FACAE1E3C5A56A6C2DF94AB6C279.

⁵ www3.weforum.org/docs/WEF_IBC_Measuring_Stakeholder_Capitalism_Report_2020.pdf.

4.1 Key Figures

KEY FIGURES ⁶	UNIT	AMOUNT
Revenues	€ million	1,852.1
Profit (loss) before taxation	€ million	570.2
Property and equipment	€ million	131.0
Income taxes accrued (current)	€ million	143.0
Income taxes paid	€ million	174.2
Number of employees	Units	916
Taxes borne	€ million	244.5
Taxes collected	€ million	485.4

4.2 Country-by-Country Report

The **Country-by-Country Report** presents the key indicators of the volume of the Group's activities in each tax jurisdiction. This information — taken into account together with the other information contained in this Report and in the related sections of the Annual Integrated Report, to which reference is made — provides a concise and transparent disclosure of the level of taxes accrued and paid in a jurisdiction⁷.

TAX JURISDICTION ⁸	CORE BUSINESS	NO. OF EMPLOYEES	INCOME FROM SALES TO THIRD PARTIES (€ MILLION)	INCOME FROM INTRAGROUP TRANSACTIONS WITH OTHER TAX JURISDICTIONS (€ MILLION)	PROFIT (LOSS) BEFORE TAXATION (€ MILLION)	PROPERTY AND EQUIPMENT (€ MILLION)	CORPORATE INCOME TAXES ACCRUED (CURRENT) (€ MILLION)	CORPORATE INCOME TAXES PAID (€ MILLION)
Italy	Banking activities	851	1,181.0	139.7	254.0	125.9	101.8	134.2
Luxembourg	Asset management	29	519.5	0.3	329.5	3.8	41.2	40.0
Switzerland	Asset management	36	11.5	-	(13.3)	1.3	-	-
Country-by-Country Reporting total		916	1,712.0	140.1	570.2	131.0	143.0⁹	174.2¹⁰
Reconciliation		-	-	(140.1)	(0.4)	(0.1)	9.9	9.9
Consolidated Financial Statements		916	1,712.0¹¹	-	569.8	131.0	153.0	184

⁶ The amounts and data of key figures (except for taxes borne and taxes collected) are calculated on the basis of the reporting principles and procedures provided for by the OECD's Action 13 CbCR guidelines and recognised in the GRI 207-4 standard. Values are presented on an aggregate and not consolidated basis and do not include the amounts relating to i) dividends received from other Group entities, and ii) the related taxes accrued and paid. For further details, reference should be made to the Glossary.

⁷ The differences that emerge from the total amounts of the Country-by-Country Report and the Consolidated Financial Statements refer to:

- **consolidation adjustments** made in application of the accounting standards adopted in preparing the Consolidated Financial Statements; and
- the **exclusion** from the **Country-by-Country Report** of the amounts relating to (i) **dividends received** from other group entities, and (ii) the **related taxes** paid and accrued.

For information on the **reasons for the difference**, at the Group level, **between** (i) the **tax burden** — expressed in terms of both actual taxes and accrued (current) taxes — and (ii) the **theoretical tax** (i.e., tax resulting from the application of the tax rate set by the tax regulations to profit/loss before taxation pursuant to GRI 207-4-b-x), reference should be made to Part C, Section 21, "Income taxes for the year from operating activities - Item 300" in the Notes and Comments to the Consolidated Financial Statements.

⁸ For the list of entities considered and their tax jurisdiction, reference should be made to the "reporting scope" appended hereto.

⁹ For a more comprehensive overview, it should be noted that the stated total amount does not include prior years' current taxes (a 1.3 million euro decrease), deferred tax assets, deferred tax liabilities and any provisions for uncertain tax liabilities (uncertain tax positions). Taxes accrued on dividends received from other group entities (approximately 9.9 million euros) are also not included.

¹⁰ For a more comprehensive overview, it should be noted that the stated total amount includes the reimbursement for higher taxes paid in previous tax periods (approximately 0.5 million euros) recognised by the Tax Authority in relation to a tax settlement agreement and taxes paid to the Assicurazioni Generali Italian national tax consolidation scheme (approximately 104.2 million euros). Corporate income taxes paid on dividends received from other group entities (approximately 9.9 million euros) are instead excluded.

¹¹ Amount corresponding to the following items of the Consolidated Profit and Loss Account: net banking income (item 120) gross of interest expense (item 20) and fee expense (item 50).

4.3 Total Tax Contribution

As mentioned above, the Total Tax Contribution (TTC) integrates the information reported in the CbCR into a wider model that takes into account all the types of taxes that the Group pays and considers not only the taxes effectively borne by the Group (**taxes borne**), but also the taxes collected on behalf of Tax Authorities (**taxes collected**)¹².

In 2024, Banca Generali's Total Tax Contribution amounted to **729.9 million euros**. **Taxes borne** accounted for **33.5% of the total** and **taxes collected** accounted for the **remaining 66.5%**.

TTC PROFILE	€ MILLION	%
Taxes borne	244.5	33.5%
Taxes collected	485.4	66.5%
Total Tax Contribution (TTC)	729.9	100.0%

The high **weight of taxes collected** reflects the **dynamics of the business** in which Banca Generali operates: **income taxes collected** and the **stamp duties applied** in relation to the products and services offered (banking accounts and services, assets under administration and assets under management) generate significant amounts of **profit taxes collected** and **product taxes collected**.

These taxes are particularly important in that they underline the role played by the Bank as withholding agent within tax systems and its capacity to generate economic value through an innovative, diversified range of high quality services offered to its Customers.

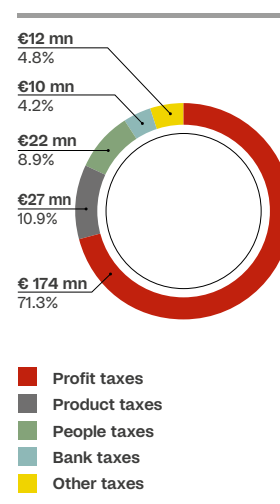
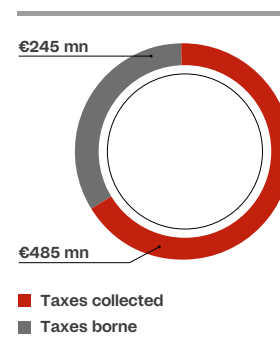
4.3.1 Taxes Borne

Taxes borne amounted to **244.5 million euros**.

Profit taxes were the main component of taxes borne, equal to **71.3%**. **Product taxes** and **People taxes** accounted for **10.9%** and **8.9%** of the total, respectively. Bank taxes contributed 4.2%, whereas Other taxes accounted for the remaining 4.8%.

BREAKDOWN OF TAXES BORNE	€ MILLION	%
Profit taxes	174.3	71.3%
Product taxes	26.7	10.9%
People taxes	21.7	8.9%
Bank taxes	10.2	4.2%
Other taxes	11.6	4.8%
Total taxes borne	244.5	100%

Profit taxes coincide with the corporate income taxes paid and include the payment of the balance of prior years' income taxes and the advance payments of income taxes due for the year¹³.



¹² The **Total Tax Contribution** offers a full overview of the taxes that Banca Generali pays in the countries in which it operates. The taxes paid by Banca Generali and included in the **TTC** are:

- firstly **broken down** into two categories:
 - **taxes borne**: taxes that are a cost for Banca Generali and impact its financial results; and
 - **taxes collected**: third-party taxes collected by Banca Generali on behalf of general governments as withholding agent or on the basis of similar mechanisms; and
- then, with regard to each of the two categories, **classified** in:
 - **profit taxes**: income taxes;
 - **people taxes**: taxes relating to employment;
 - **product taxes**: taxes on products and services;
 - **bank taxes**;
 - **other taxes**. In methodological terms, this category also includes planet or environmental taxes and property taxes, which are not applicable or material to Banca Generali in light of its business of operation.

¹³ In general, the income tax payment mechanism provides that, in the year of reference, the Company pays the **balance of taxes** due for the previous year (or prior years) and the **advance payment of taxes** due for the current year. Advances may be calculated using (i) the so-called **historical method**, based on the actual income for the previous year (or prior years) or (ii) the so-called **forecasting method**, based on an estimate of income for the year.

Product taxes substantially include non-deductible VAT.

People taxes essentially include the social security contributions borne by Banca Generali as employer.

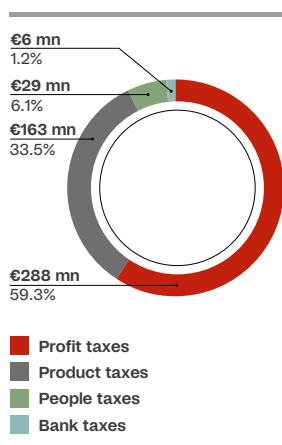
Bank taxes refer to contributions to the banking crisis and deposit protection funds and other similar funds.

Other taxes mainly include the social security contributions (Enasarco contributions) relating to Financial Advisors and paid by the Bank for the portion under its remit.

4.3.2 Taxes Collected

Taxes collected amounted to **485.4 million euros**.

Profit taxes and **Product taxes** were the main components of taxes collected, accounting for **59.3%** and **33.5%** of the total, respectively. **People taxes** contributed **6.1%**, whereas **Other taxes** accounted for the remaining **1.2%**.



BREAKDOWN OF TAXES COLLECTED	€ MILLION	%
Profit taxes	287.7	59.3%
Product taxes	162.5	33.5%
People taxes	29.4	6.1%
Other taxes	5.7	1.2%
Total taxes collected	485.4	100%

Profit taxes mainly include **income taxes collected from customers** (the most significant of which are the taxes applied on assets under administration and assets under management) and **taxes applied to fees** paid to Financial Advisors who provide their services in favour of the Bank.

Product taxes substantially include the stamp duties applied and the net VAT paid.

People taxes essentially include the personal income tax and the social security contributions borne by Banca Generali's employees and collected by the Bank in its capacity as employer.

Other taxes mainly refer to the social security contributions (Enasarco contributions) in relation with the Financial Advisors who provide their services in favour of the Bank, and collected by the latter as the principal.

4.3.3 Evolution of TTC

In 2024, the Total Tax Contribution **grew** by approximately **191.9 million euros overall** compared to 2023.

EVOLUTION OF TTC (€ MILLION)	2024	2023	2024-2023	2024-2023 %
Taxes borne	244.5	221.4	23.2	10.5%
Taxes collected	485.4	316.7	168.7	53.3%
Total Tax Contribution (TTC)	729.9	538.0	191.9	35.7%

This result was driven by an increase in both **taxes borne** (+23.2 million euros) and **taxes collected** (+168.7 million euros).

Taxes borne

The main changes in taxes borne referred to **profit taxes** (+24.8 million euros) and **bank taxes** (-5.9 million euros). The other tax categories reported minor changes.

EVOLUTION OF TAXES BORNE (€ MILLION)	2024	2023	2024-2023	2024-2023 %
Profit taxes	174.3	149.5	24.8	16.6%
Product taxes	26.7	24.6	2.1	8.5%
People taxes	21.7	19.7	2.0	10.4%
Bank taxes	10.2	16.1	-5.9	-36.8%
Other taxes	11.6	11.4	0.2	2.0%
Total taxes borne	244.5	221.4	23.2	10.5%

The increase in profit taxes was due to:

- › **lower taxes paid in Luxembourg** (-29.6 million euros), where advance payments made in 2023 had been calculated based on prior years' particularly positive income¹⁴ ¹⁵;
- › **higher taxes paid in Italy** (+54.4 million euros) with reference to 2024 (i.e., in terms of balance of 2023 taxes and advances on 2024¹⁴ taxes), as a result of the increase in net interest income between 2022 and 2023.

Bank taxes declined in 2024 as no contribution was due following the end of the contribution cycle to the European Single Resolution Fund (SRF), which had provided for the payment of eight annual instalments from 2016 to 2023. The last contribution to the Italian Interbank Deposit Protection Fund was also paid in 2024 for a total of about 10.2 million euros.

Taxes collected

The increase in **taxes collected** was attributable to **profit taxes** (+90.1 million euros) and **product taxes** (+77.6 million euros).

EVOLUTION OF TAXES COLLECTED (€ MILLION)	2024	2023	2024-2023	2024-2023 %
Profit taxes	287.7	197.6	90.1	45.6%
Product taxes	162.5	84.9	77.6	91.3%
People taxes	29.4	29.1	0.3	1.2%
Other taxes	5.7	5.1	0.7	12.8%
Total taxes collected	485.4	316.7	168.7	53.3%

Profit taxes collected and **product taxes collected** grew mainly as a result of (i) a favouring context that supported demand for financial advisory and investment products and led to a business expansion, driven by higher net inflows from total client assets managed and administered, as well as (ii) the positive performance of the financial market. All these elements led to an increase in income taxes and taxes withheld (profit taxes) and in stamp duties (product taxes) with regard to the financial products and services offered.

Profit taxes collected chiefly changed due to taxes collected on the results of financial performance and on premiums and yields of bonds and securities, as well as to taxes withheld on investment undertakings' income and on interest rates, in accordance with the increase in assets that customers invested in financial instruments and with the positive market performance, in addition to the effect of the increase in interest rates on deposits and current accounts.

Besides the above-mentioned reasons, **product taxes collected** changed also due to the fact that in 2023 (i) advances on 2024 taxes had not been paid and (ii) the last bimonthly instalment for 2023 was paid at the beginning of 2024.

¹⁴ In Luxembourg and Italy, balances of and advances on income taxes were calculated using the historical method, which took account of income for the previous year (Italy) or for prior years (Luxembourg).

¹⁵ Taxes paid in 2023 in Luxembourg had included (i) the balance of taxes due for the 2021 tax period amounting to approximately 20 million euros and (ii) the tax advances for the 2023 tax period amounting to about 50 million euros. It should be noted that the significant amount of said advances, which had been calculated on the basis of the 2021 results (a year in which BG Fund Management Luxembourg S.A. had reported a particularly positive performance), had been in excess of the actual taxes due on the basis of the 2023 results.

4.3.4 Main Indicators of the Group Total Tax Contribution

1. TTC/revenues ratio

The **TTC/revenues ratio** identifies the portion of revenues used for paying borne and collected taxes.

For every 100 euros of revenues generated in 2024, Banca Generali paid 39.4 euros of taxes, of which 13.2 euros for taxes borne and 26.2 euros for taxes collected.

TTC/REVENUES RATIO	%
Total taxes borne	13.2%
Total taxes collected	26.2%
Total Tax Contribution	39.4%

Compared to 2023, this ratio rose by approximately 4.7 percentage points, mainly attributable to the above-mentioned increase in profit taxes collected and product taxes collected.

2. Total tax rate

The **total tax rate** provides a concise overview of the tax burden arising from all taxes paid as taxpayer, showing the weight of taxes that represent a cost for Banca Generali (**taxes borne**) on profit before such taxes (**profit before taxes borne**).

For every 100 euros of profit before taxes borne in 2024, Banca Generali paid 38.2 euros of taxes borne.

TOTAL TAX RATE	%
Total tax rate	38.2%

In 2024, the total tax rate continued to show that the Group paid a significant portion of **taxes borne** in relation to profit before such taxes. Compared to 2023, this indicator declined by about 6 percentage points, chiefly as a result of the more-than-proportional increase in the profit before taxes borne with respect to the rise in taxes borne.

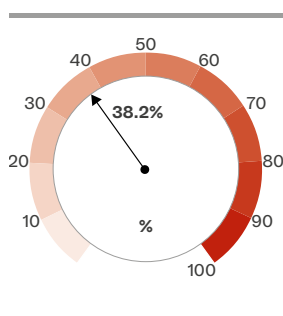
3. People taxes per employee

People taxes per employee indicate the amount of average taxes paid in relation to employment for each employee.

For each employee, Banca Generali paid 55,883 euros of people taxes on average, of which 23,694 euros for people taxes borne and 32,139 euros for people taxes collected.

PEOPLE TAXES PER EMPLOYEE	AMOUNTS PER EMPLOYEE (€ UNIT)
People taxes borne	23,694
People taxes collected	32,139
Total people taxes	55,833

In 2024, people taxes per employee continued to show that the Group pays a significant amount of people taxes for each employee. Compared to 2023, this indicator increased slightly (by 633 euros per employee) in line with the employment trends and the salary levels, which grew in 2024 compared to 2023.



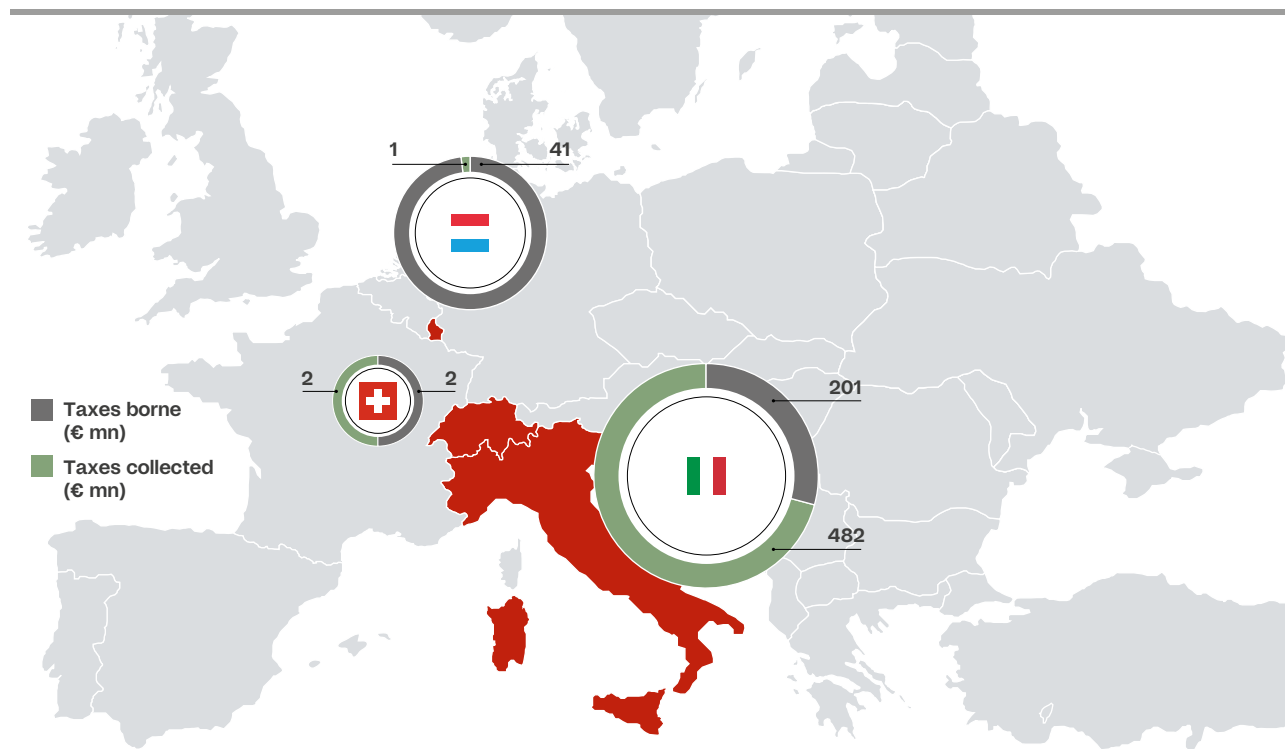
4.3.5 Distribution of the Group Total Tax Contribution

The Group Total Tax Contribution is distributed among the countries in which Banca Generali operates (Italy, Luxembourg and Switzerland) in line with the dynamics of the key indicators measuring the Group's footprint in those countries.

COUNTRY	TAXES BORNE (€ MILLION)	TAXES COLLECTED (€ MILLION)	TTC (€ MILLION)	REVENUES (€ MILLION)	PROPERTY AND EQUIPMENT (€ MILLION)	NO. OF EMPLOYEES (UNITS)
Italy	200.6	482.2	682.8	1,320.7	125.9	850.7
Luxembourg	41.5	1.5	42.9	519.8	3.8	28.9
Switzerland	2.5	1.8	4.2	11.5	1.3	36.3
Total	244.5	485.4	729.9	1,852.1	131.0	915.8

Approximately 94% of Total Tax Contribution was concentrated in Italy, in line with the breakdown of Revenues, Property and equipment, and Number of employees.

TAX CONTRIBUTION BY COUNTRY



4.4 Income Taxes

The following table shows the **actual tax rate** and the **cash tax rate** of Banca Generali Group as a whole, as reported in the Profit and Loss Account and Cash Flow Statement contained in the Consolidated Financial Statements.

€ MILLION	BANCA GENERALI GROUP (CONSOLIDATED FINANCIAL STATEMENTS)
Profit before taxation (A)	569.8
Income taxes for the year ¹⁶ (B)	138.5
Income taxes paid ¹⁷ (C)	184.1
Actual tax rate (B/A)	24.3%
Cash tax rate (C/A)	32.3%

The Group's **actual tax rate** was **24.3%, slightly down** compared to 2023 (26.5%), mainly due to the higher contribution of the foreign entities to the Group's result. For further details, reference should be made to the Consolidated Financial Statements¹⁸.

The Group's **cash tax rate** was **32.3%, slightly down** compared to 2023 (35.0%). Despite higher income taxes paid in Italy, this result was due to the fact that, as mentioned above, advances paid in Luxembourg in 2023 had exceeded actual taxes due, leading to lower taxes paid in the subsequent year (i.e., 2024).

¹⁶ **Income taxes for the year**, as reported in the consolidated and separate financial statements of Banca Generali S.p.A. (**reported taxes**). Unlike item "Corporate income taxes accrued (current)" reported in the "Country-by-Country Report" section, item "Income taxes for the year" also includes current taxes on dividends received from other entities of Banca Generali Group, prior years' taxes, deferred tax assets and liabilities and any provisions for uncertain tax liabilities (uncertain tax positions).

¹⁷ **Income taxes paid** including taxes on dividends received from other Banca Generali Group entities, prior year's taxes paid, and taxes paid to the Assicurazioni Generali Italian national tax consolidation scheme.

¹⁸ Part C - Section 21 "Income taxes for the year from operating activities - Item 300" in the Notes and Comments to the Consolidated Financial Statements.

5. Annex

Glossary

No. employees: average number of employees in the year, calculated on a full-time equivalent basis.

Revenues: sum of (i) Income from sales to third parties and (ii) Income from intragroup transactions with other tax jurisdictions.

Income from sales to third parties: income from transactions with entities not belonging to Banca Generali Group (i.e., entities not included in the Consolidated Financial Statements of Banca Generali S.p.A.).

Intragroup revenues with other tax jurisdictions: income generated by transactions between group entities residing in other tax jurisdictions. Dividends received from other group entities are not included.

The term "income" is to be construed broadly as corresponding to net banking income gross of interest expense and fee expense. Dividends received from other group entities are not included.

Profit (loss) before taxation: profit gross of taxes. Dividends received from other group entities are not included. For the purposes of section "Income Taxes", the Profit (loss) before taxation also includes dividends received from other entities of Banca Generali Group.

Corporate income taxes paid: corporate income taxes paid (on a cash basis) in the reporting year, regardless of the year to which the taxes refer. Corporate income taxes paid do not include taxes paid on dividends received from other group entities. For a more comprehensive overview, it should be noted that the stated amount includes (i) the reimbursement for higher taxes paid in previous tax periods recognised by the Tax Authority in relation to a tax settlement agreement and (ii) taxes paid to the Assicurazioni Generali Italian national tax consolidation scheme.

For the purposes of section "Income Taxes", Income taxes for the year paid also include taxes paid on dividends received from other entities of Banca Generali Group.

Corporate income taxes accrued (current): corporate income taxes calculated on the taxable income for the year (**current taxes**). Prior-year current taxes, deferred tax assets, deferred tax liabilities and any provisions for uncertain tax liabilities (uncertain tax positions) are not included. Taxes accrued on dividends received from other group entities are also not included;

Income taxes for the year: Income taxes for the year, as reported in the Consolidated and Separate Financial Statements of Banca Generali S.p.A. (**reported taxes**). This item includes current taxes (also those on dividends received from other entities of Banca Generali Group), prior years' taxes, deferred tax assets and liabilities and any provisions for uncertain tax liabilities (uncertain tax positions).

Property and equipment (other than cash and cash equivalents): net carrying amount of property and equipment. Pursuant to IFRS 16, property and equipment include "rights of use" arising from property and other equipment leasing transactions. Cash and cash equivalents, intangible assets and financial assets (equity investments) are not included.

Total Tax Contribution (TTC) Framework: a universal framework that provides a clear, concise overview of all the taxes that a company contributes to public finances. The Framework measures the contribution of a company to a country's tax revenue on a cash basis. It is structured in a simple, non-technical way, and is thus relatively easy to understand for those who possess limited understanding of tax matters. It is based on **three pillars**: 1) the definition of "tax", 2) the distinction between taxes borne and taxes collected and 3) the classification of taxes into various categories.

The **definition of "tax"**: in the context of the TTC Framework and in keeping with the definition

provided by the OECD¹⁹, the term "tax" indicates "a compulsory unrequited payment to the central government". Payments that yield a benefit in terms of value arising from the use of a good or entitlement to a right are not considered taxes.

The term "tax" is thus to be understood as referring not only to income taxes, but also to other forms of taxation to which a company is subject, including both taxes borne by the company as taxpayer or collected as withholding agent.

Distinction between taxes borne and taxes collected:

- › **Taxes borne:** taxes that are a cost for the company and impact its financial results; and
- › **Taxes collected:** third-party taxes collected by the company on behalf of general governments as withholding agent or on the basis of similar mechanisms. Such taxes are considered in light of the value generated and the economic activity exercised by the company.

Taxes are broken down into different categories:

- › **Profit taxes:** income taxes. Profit taxes may be:
 - **borne:** corporate income taxes paid, as described above;
 - **collected:** where a withholding is applied to payments made to third parties or natural persons (such as withholdings on profits of a financial nature, interest and royalties, and professional services).
- › **People taxes:** taxes and social contributions associated with an employment relationship. People taxes may be:
 - **borne:** income taxes and social security contributions borne by Banca Generali in its capacity as employer (e.g., social security contributions, health insurance/pension/disability contributions); or
 - **collected:** personal income taxes or social security contributions borne by the employee and withheld by Banca Generali in its capacity as employer (e.g., personal income tax and social security contributions).
- › **Products taxes:** indirect taxes on the production, supply, use and consumption of goods and services, regardless of the fact that they are paid to good suppliers or service providers or directly to general governments. The value added tax (VAT) and the stamp duty are included in this category. Product taxes may be:
 - **borne:** non-deductible VAT; or
 - **collected:** stamp duty applied and net VAT paid.
- › **Bank taxes:** contributions to the banking crisis and deposit protection funds and other similar funds. They include the contributions to the European Single Resolution Fund, the Italian National Resolution Fund managed by the Bank of Italy and the Interbank Deposit Protection Fund. These are generally taxes borne.
- › **Other taxes:** a residual category that includes all taxes that are not included in one of the previous four tax categories. By way of example, Other taxes include: (i) the social security contributions (Enasarco contributions) paid in relation with the Financial Advisors who provide their service in favour of the Bank and (ii) property taxes. Theoretically, other taxes also include the so-called "planet taxes" or "environmental taxes" such as, for instance, taxes on energy products, waste, fuels and, in general, all taxes on the supply, use and consumption of goods and services that may harm the environment. However, these taxes are not applicable or are, in any case, not material to Banca Generali, in light of its business of operation.

¹⁹ "OECD Revenues Statistics 2024 – Health taxes in OECD countries", Annex A. The OECD classification of taxes and interpretative guide - www.oecd.org/en/publications/revenue-statistics-2024_c87a3da5-en.html.

Disclaimer

This Report has not been audited by the Independent Auditors.

The data contained herein refer to the year 2024 (i.e., from 1 January 2024 to 31 December 2024), namely the reporting period of the Annual Integrated Report 2024.

This document is drawn up in euros, i.e., the functional currency used to prepare the Annual Integrated Report 2024. The amounts (except for the number of employees) are shown in millions and rounded to the first decimal, unless otherwise reported. Therefore, the sum or ratio of the rounded amounts may sometimes differ from the value of the rounded total.

The **reporting scope** coincides with the scope of equity investments in wholly owned subsidiaries presented in the Consolidated Financial Statements of Banca Generali S.p.A. at 31 December 2024. It includes the following companies²⁰.

COMPANY NAME	REGISTERED OFFICE	OPERATING OFFICE
Banca Generali S.p.A.	Italy (Trieste)	Italy (Trieste, Milan)
BG Fund Management Luxembourg S.A.	Luxembourg (Luxembourg)	Luxembourg (Luxembourg)
Generfid S.p.A.	Italy (Milan)	Italy (Milan)
BG Suisse S.A.	Switzerland (Lugano)	Switzerland (Lugano)
BG Valeur S.A.	Switzerland (Lugano)	Switzerland (Lugano)

With regard to this document, it should also be noted that:

- › the term “Banca Generali” is used to indicate the entire Banca Generali Group, also referred to by the expression “Banking Group” or “Bank”;
- › where it is necessary to refer to Banca Generali individually as the Parent Company, the full company name “Banca Generali S.p.A.” is used.

²⁰ For further information, reference should be made to Part A.1, Section 3 – “Consolidation Scope and Methods” of the Annual Integrated Report 2024.

Banca Generali S.p.A.

Registered office
Via Machiavelli 4 - 34132 Trieste

Share capital
Authorised 119,378,836 euros
Subscribed and paid 116,851,637 euros

Tax and VAT code and registration number
in the Trieste Register of Companies 00833240328
VAT No. 01333550323

Company managed and coordinated
by Assicurazioni Generali S.p.A.
Bank which is a member of the
Interbank Deposit Protection Fund
Registration with the bank register
of the Bank of Italy under No. 5358
Parent Company of the Banca Generali Banking
Group registered in the banking group register
ABI code 03075.9



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