

Compliance system implemented by the company

Geico has always been committed to Corporate Compliance. With this in mind, it has voluntarily implemented an Organisational Model on the conduct of directors, employees and collaborators in their business dealings. All of this in line with Legislative Decree no. 231 of 8 June 2001 on corporate social responsibility, Legislative Decree no. 61 of 11 April 2002 on the reform of corporate offences and following the subsequent, and also recent, regulatory changes, particularly as regards security.

The Code of Ethics is an integral part of this Model and can be defined as a company's "Constitutional Charter", a charter of moral duties and rights that sets out the ethical and social responsibilities of each part of the business structure.

It is an effective means available to the company of preventing irresponsible or illegal conduct on the part of those who work for and on behalf of the company, as it introduces a clear and precise definition of the ethical and social responsibilities of its executives, managers and employees, while often also extending to the suppliers of the various stakeholder groups.

It is the main tool used to implement ethics within the company.

The Code of Ethics has become a corporate management tool, a means of ensuring the fair and effective management of operations and human relations, which supports the company's reputation, so as to create confidence externally.

In addition to the Code of Ethics, and following thorough risk analysis, the company has also implemented a set of rules and procedures and training processes on applicable laws that together form an effectively integrated package that all company employees are required to comply with to prevent the company being held accountable in a criminal court of law for any offences committed in its own interest or to its own advantage. The full Organisational Model is available from the company.

The Taikisha Ltd acquisition of a 51% interest in Geico SpA in 2011, a company listed on the Tokyo Stock Exchange, means that Geico Group is consequently subject to the compliance applicable to listed companies in Japan (J-Sox).