



ZEDRA

DO MORE. ACHIEVE MORE.

# Chair's annual report

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## Generali

- | Year ended 31 December 2024
- | The ZEDRA Governance Advisory Arrangement (GAA)

September  
2025



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# Executive summary

**This report on the workplace accumulation pension product provided by Generali (“the Firm”), has been prepared by the Chair of the ZEDRA Governance Advisory Arrangement (“the GAA”) for Generali pension policyholders. It sets out our independent assessment of the value delivered to policyholders and our view of the adequacy and quality of the Firm’s policies in relation to Environmental, Social and Governance (ESG) risks, non-financial considerations and stewardship.**

Further background on the activity of the GAA and details of the credentials of the GAA can be found in Appendices C and D respectively. The GAA works under an agreed Terms of Reference, the latest version of which is dated 18 March 2024 and is publicly available (see Appendix D).

This report covers the workplace accumulation product, Generali Personal Pension Plan. The product does not have a designated default and was closed to new contributions in 2005. This is the latest assessment made by the GAA. There are also a small number of individuals who invest in the personal pension plan within this product. These individuals invest in the same funds but have a different charging structure, which is explained further in section 8. This report does not explicitly cover these individuals, but comments about the value for money are done so at the product level.

As Chair of the GAA for this Firm, I am pleased to deliver this value assessment of the Generali Personal Pension Plan. The GAA has conducted a rigorous assessment of the Value for Money (“VfM”) delivered to policyholders over the period 1 January 2024 to 31 December 2024. The GAA has developed a Framework to assess Value for Money which balances the quality of services and investment performance provided to policyholders against what they pay for those services and investment performance. Further details are set out on page 7.

### A COLOUR CODED SUMMARY OF THE GAA ASSESSMENT

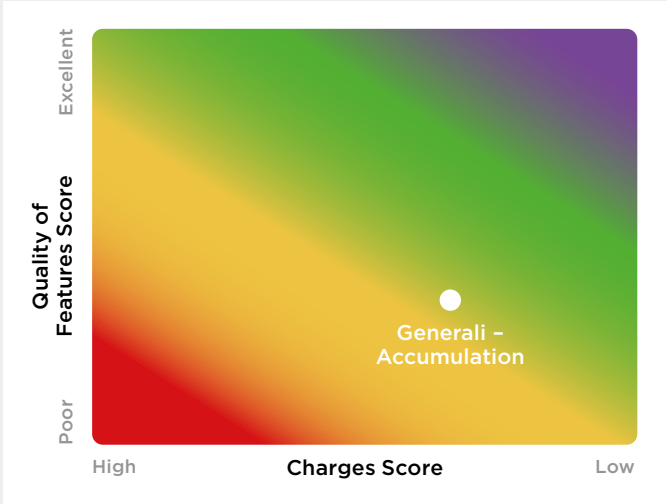
	Weighting toward VfM assessment*	Investment Pathways
1. Product strategy design and investment objectives	13%	●
2. Investment performance and risk	10%	●
3. Communication	17%	●
4. Firm governance	7%	●
5. Security of policyholder benefits	7%	●
6. Administration and operations	10%	●
7. Engagement, innovation and improvements for policyholder experience	3%	●
8. Cost and charge levels	33%	●
<b>Overall Value for Money assessment</b>	<b>100%</b>	●

\* May not add to 100% due to rounding

<p><b>Quality of service and investment features (1-7)</b></p> <p>● Excellent ● Good ● Satisfactory ● Poor</p>	<p><b>Cost and charge levels (8)</b></p> <p>● Low ● Moderately Low ● Moderately High ● High</p>
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How we determine our Value for Money rating is set out on page 7 of this report. The overall Value for Money is visually represented by the heatmap below.

### VALUE FOR MONEY SCORING



## Our conclusion is that Generali workplace accumulation pension plan provides **satisfactory** value for money.

There are specific areas identified where the GAA has challenged Generali to provide more information as follows. The GAA has challenged the Firm on the following:

- | Generali is encouraged to continue strengthening its framework for assessing the ongoing suitability of pension products. This framework should be clearly documented, regularly reviewed, and actively discussed within the relevant pensions committee to ensure it remains effective and aligned with best practices. There appears to be a disconnect with how investment decisions are being made by the asset management business and the UK pensions teams. This was a similar challenge raised last year and we have not seen improvements on how the underlying fund changes are articulated. The GAA believes this is why the policyholder bulletin (see further below), which articulates the investment approach for each fund and provides performance numbers, could be more transparent and better manage customer expectations.
- | The GAA has previously observed that while the annual investment bulletin meets legislative requirements, the clarity and usefulness of information - particularly regarding the nature of the underlying investments - could be materially improved. Enhancing both the quantity and quality of fund details, including clearer expectations around future returns and risk ratings, would support better customer understanding. We expect to see improvements made during the year.
- | We expect there to be greater awareness of, and information provided to policyholders to protect themselves against scams and possible fraud. With financial scams becoming more prevalent, we expect greater efforts to be made to protect customers. This involves more educational pieces and information shared with policyholders, such as signposting to helpful websites, in addition to the thorough checks done on any transfer requests by the Generali administration team.

The Firm is challenged to have a robust framework in place for assessing performance, with plans in place for how underperformance would be addressed. Although the UK Investment Committee has been meeting quarterly for over 10 years, it only recently started to review the performance of the funds allocated to the Generali Personal Pension Plan. Prior to this, only aggregated figures and other products were shared in these meetings.

As part of this review framework, the GAA observed that they would like to see greater focus on areas of risk within the business and where this may detrimentally impact on customers, such as:

- | The GAA noted that there is a small core UK team that administer these policies, which represents key person risk for the Firm. This runs the risk of leading to poor member service in periods of high activity as well as future succession planning issues.
- | The GAA noted that the administration team has a target for key tasks of 5 working days. This target is arguably more relaxed compared to the wider market, where automation and straight through processing is often available. That being said, the service levels are regularly being met on the majority of tasks within this 5-day target. In light of the key person risk mentioned above, the Firm should be cognisant of the potential benefits of automation.

We concluded that the Firm's policies in relation to **Environmental, Social and Governance (ESG)** risks, non-financial considerations and stewardship were adequate.

The FCA requires a comparison of your pension product with other similar options available in the market. If an alternative scheme appears to offer better value, we must inform the pension provider. Our view on each feature that we are required to make a comparison on is included in the relevant section of the report. Details of how we selected the comparator group is set out in Appendix B. As can be seen later in the report, the Generali Personal Pension Plan is

broadly in line with competitors in many areas, but was behind the peer group average for Communications because of the lack of online facilities available to policyholders.

A joint consultation was launched in early 2023 by the Financial Conduct Authority (FCA), the Department for Work and Pensions (DWP) and The Pensions Regulator (TPR) on the framework for assessing Value for Money. This consultation set out a transformative framework of metrics and standards to assess value for money across all Defined Contribution (DC) pension arrangements including the workplace pensions reviewed by the GAA. The regulators' overarching aim is to improve the value savers get from their DC pension by increasing comparability, transparency, and competition across defined contribution (DC) pension schemes, regardless of whether regulated by the FCA or TPR. The consultation does not affect this year's review but may mean a change in the way that Value for Money is assessed in the future.

Where we have used technical pensions terms or jargon, these are explained in the glossary in Appendix E.

I hope you find this value assessment interesting, informative and constructive.

## Alan Greenlees

**Chair of the ZEDRA Governance Advisory Arrangement  
for Generali Workplace Pension Plan**

September 2025



**If you are a policyholder and have any questions, require any further information, or wish to make any representation to the GAA you should contact:**

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[ebteachsupport@generali.co.uk](mailto:ebteachsupport@generali.co.uk)

[www.generali.co.uk](http://www.generali.co.uk)

Alternatively, you can contact the GAA directly at [zgl.gaacontact@zedra.com](mailto:zgl.gaacontact@zedra.com)



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# Overview of the value assessment

**The GAA has assessed the Value for Money delivered by Generali to its workplace accumulation pension policyholders by looking at costs versus investment and service benefits. More detail about how we have done this is set out below.**

## Our approach

The GAA believes that value for money is subjective and will mean different things to different people over time, depending on what they consider important at that time.

What is clear is that it is always a balance of cost versus investment and service benefits. Our fundamental approach has therefore been to compare all the costs paid by policyholders against the investment performance and quality of services provided to policyholders.

The key steps for the GAA in carrying out the Value for Money assessment are:

- | Issuing a comprehensive data request to the Firm, requesting information and evidence across a wide range of quality features, including [net investment performance](#), as well as full information on all costs and charges, including [transaction costs](#).
- | Attending a number of formal meetings with representatives of the Firm to interrogate the data provided and to enable the GAA to question or challenge on any areas of concern. All such meetings have been documented by formal minutes and a log is also maintained containing details of any challenges raised,

whether informally or through formal escalation.

- | Once the Firm has provided the information and evidence requested, the GAA has met to discuss and agree provisional Value for Money scoring using the Framework developed by the GAA and to undertake comparisons of the Firm's product against a suitable comparator group of providers for certain Quality of Service and Investment Features and Cost and Charges.
- | The provisional Value for Money score, including a full breakdown, has then been shared and discussed with the Firm.

The Framework developed by the GAA to assess overall Value for Money for policyholders involves rating the Firm against eight different features covering Quality of Service, Investment Performance and Strategy (the "Quality of Service and Investment Features"), and the Costs and Charges borne by the Policyholders. This assessment is undertaken relative to the GAAs view of good practice.

The Quality of Service and Investment Features have been determined based directly on the FCA requirements for assessing ongoing Value for Money set out in [COBS 19.5.5](#), including services relating to communications with policyholders and processing of [core financial transactions](#). The assessment also includes other aspects the GAA considers important based on our experience of conducting Value for Money assessments over many years, such as the Firm's governance structure, the financial security for policyholders, the Firm's approach to engagement, innovation and service improvement, and a wider overview of the administration quality and processes.

Within each of the Quality of Service and Investment Features are several sub-features. These sub-features are each scored using a numeric scoring system. Scoring is aided by means of score descriptors, developed for each sub-feature, ensuring the GAA adopts a consistent approach to scoring across clients, each outlining what the GAA would expect to see to achieve the relevant numeric score. The scores for each sub-feature are then aggregated to the feature level based on our view of the relative value of the sub-feature to the policyholders ranging from Poor to Excellent.

The GAA will then consider the value represented by the costs and charges which policyholders bear. The assessment of cost and charge is primarily driven by the level of ongoing charges for investment management, administration, and any platform fees. The GAA also considers the underlying transaction costs incurred by the funds invested in and how they are controlled, and any additional costs the policyholders have to pay in managing their policies. The costs and charges are also rated on a scale from Low to High. This rating takes into account information available to the GAA on general levels of costs and charges or pension providers in the marketplace.

The scores for each feature are then combined using the weightings set out in the table in the Executive Summary to determine an Overall Value for Money rating. The weightings used are based on the GAA's views of the relative importance to the policyholders of each feature. The weightings are tilted towards the features which have been identified in the regulations relevant to forming this assessment of value. Where possible, we have taken into account the likely needs and expectations of this group of policyholders.

In the sections on the following pages, we have described the Firm's approach to delivering each of the features, and the rating the GAA has awarded, together with any areas for improvement we have identified.

In addition, there is a section setting out the GAA's views on the adequacy and quality of the Firm's policies on [ESG](#) financial considerations, non-financial considerations, and stewardship. Whilst this is a largely qualitative assessment the GAA has considered the Firm's policies in comparison to others the GAA has knowledge of.

A comparative assessment of the Firm's pension product has also been made of the net investment performance, quality of communication and quality of the administration service including processing of core financial transactions, and costs and charges relative to a suitable comparator group of product providers. Comments on the outcome of these assessments is included in the sections for the relevant Features. We have also considered whether, overall, an alternative provider would offer better Value for Money so that we can inform the Firm if we believe this to be the case. Details of how the comparator providers and products were determined is set out in Appendix B.



# 1. Product strategy design and investment objectives

**Value score:**  Excellent  Good  Satisfactory  Poor

## What are we looking for?

We want to see that all investment options have clear statements of aims and objectives – in particular that as well as qualitative objectives, there are quantitative objectives in place, that investment performance outcomes can objectively be measured against. Ideally, we would like to see evidence that these objectives link back to the needs of policyholders. We are also looking for evidence of a robust ongoing review process for all investment options, and evidence that the Firm has taken steps to implement changes to investment options, where appropriate, to ensure alignment with policyholders' interests.

Whilst policies on [ESG](#) financial considerations and non-financial matters are considered separately on page 24, we expect to see evidence of how these matters are taken into account in the design of the investment strategy and in investment decision making.

## The Firm's approach

The investment options are set and reviewed by the Product Committee, but responsibility for the underlying investment managers is delegated to the investment arm of Generali, Generali Asset Management S.p.A. SGR. The investment arm then appoints specialist third party asset-managers.

These are then held in white-labelled funds on the Generali pensions platform. Some of the funds available to investors use more than one underlying manager.

The white-labelled investment options available to policyholders are as follows:

- | Generali UK Equities
- | Generali European Equities
- | Generali US Equities
- | Generali Japanese Equities
- | Generali Fixed Interest
- | Generali Money
- | Generali Balanced Managed (which invests via other Generali funds above)

There is no default option, meaning that policyholders are required to make a conscious decision at the outset, but have the option of changing their investment choices prior to retirement.

Investors receive an annual investment communication that shares performance figures, as well as a reminder about the investment mandate of each fund. This investment bulletin is made publicly available on Generali's website and issued to members each year.

The Firm has given appropriate considerations to ESG at a business level and several of the investment options available to investors do have an ESG-focused manager within their blended white-labelled fund, although this may not always be clear to the customer. Although it does not appear to be a conscious decision taken by the UK pensions team, the funds available to customers do demonstrate ESG considerations. This implicit alignment suggests that ESG factors are being integrated into investment decisions by the asset management team, even if not explicitly documented.

## Areas for improvement

### GAA challenges

Generali are challenged to have a more robust framework in place for how the ongoing suitability of the pension product for their policyholders is tested. This framework needs to be well-documented and reviewed regularly, as well as discussed within the relevant Product Committee in Generali. These objectives should be articulated to the investment business and underlying fund managers selected to deliver against these criteria.

Furthermore, the GAA noted that the information made available to investors (currently via the annual bulletin) could be more useful. The information provided meets the legislative requirements but specifics on the underlying investments is potentially confusing, with fund descriptions being opaque and not always reflective of how the underlying asset managers are investing. The GAA challenges Generali to review the annual investment communication and make improvements to both the quantity and quality of fund details provided, including expectations around future returns and risk ratings.

### GAA observations

It was noted that a number of the blended funds do have specific ESG and responsible investment aspects, which is to be commended. However, as referenced earlier, that is not necessarily clear to investors.



## 2. Investment performance and risk

**Value score:**     Excellent     Good     Satisfactory     Poor

### What are we looking for?

We would expect to see a robust governance framework under which investment performance is monitored on a regular basis. Performance should be measured against investment objectives, including against a measurable and stated benchmark. Performance should be net of fees. In addition to the stated benchmark comparison risk adjusted returns should also be considered.

Where there are any concerns over investment performance, we expect to see evidence of appropriate action being taken, which may include engagement with investment managers and/or implementing changes to fund options. We also expect to see evidence that the strategies are effective and take into account the policyholders' attitudes to risk.

### The Firm's approach

The Investment Committee are responsible for reviewing investment performance quarterly, based on information received from Generali Asset Management S.p.A. SGR.

No documented framework has been shared with the GAA for how underlying asset managers are assessed, or the criteria for which underperformance is acted upon. However, the asset management team do make changes to the underlying fund managers used based on

concerns about performance or other key changes to personnel or the funds' approach.

The UK pensions team perform separate checks on unit prices of the white-labelled funds as an added layer of operational robustness. Performance of the white-labelled funds is benchmarked against passive indices, which are often comparable to the underlying funds.

Aside from the spot checks on unit prices, there are no further volatility or risk metrics in place to help assess the risk-adjusted returns.

### Net investment performance

The [net investment performance](#) of the funds available to policyholders over 12 months to 31 December 2024 and, where available, the performance of the benchmarks are set out in the following table.

Fund Name	Net Investment Performance	Comparator
UK Equities Pen	11.6%	5.6%
European Equities	4.0%	1.1%
Japanese Equities	9.4%	7.5%
US Equities	24.9%	25.3%
Money	3.1%	5.0%
Fixed Interest	-4.8%	2.5%
Balanced Managed	12.9%	9.6%

## Comparator results

We have assessed how the net investment performance provided to the Firm's policyholders compares to other sufficiently similar employer pension arrangements. This takes account of both the nature of the provider and the performance of the investments being offered relative to an appropriate benchmark.

This assessment identified that the one year net investment performance relative to benchmark for the Firm's policyholders over 2024, weighted by the size of funds invested, was average relative to the comparator group.

## Areas for improvement

### GAA challenges

The GAA noted that performance of the funds is assessed relative to a comparative index. In many cases, the comparator is not always like-for-like and may be difficult for investors to draw meaningful conclusions about performance, particularly where funds may be considered as passively managed and therefore expect to track the comparative index. This could be addressed by greater clarity about how the white-labelled funds are invested, their management approach and the geographical or sector areas they invest in. Alternatively, Generali could review the performance comparators used and if they remain fit for purpose to be labelled as 'benchmarks'.

### GAA observations

The GAA noted that there is little in the way of assessment on the risk and volatility on fund performance.

## 3. Communication

**Value score:**

Excellent

Good

Satisfactory

Poor

### What are we looking for?

As a minimum we expect communications to be fit for purpose, clear and engaging and to be tailored to take into account policyholders' characteristics, needs and objectives.

We would expect to see a comprehensive suite of communications including annual benefit statements, pre-retirement wake-up letters and retirement option packs. These packs should be available as either paper or digitally, with considerations also given for accessibility to customers.

Information on administration charges and **transaction costs** should be made available to policyholders on a publicly available website annually, including illustrations of the compounding effect of the administration charges and transaction costs on an annual basis.

In a high quality communication service offering we would expect a substantial online offering, with a range of online support materials such as online calculators to enable personalised calculations with various selectable options. We would expect telephone support to be available, with good evidence of telephone scripts, call monitoring and staff training.

Additionally, we would expect policyholders to be able to switch investment options online and to have support available to help them make appropriate decisions. In particular, we would expect there to be appropriate risk warnings built into the process.

We would expect the provider to be able to offer a range of different retirement options for policyholders, as well as clear signposting to policyholders on where they can obtain guidance and advice on their retirement options.

### The Firm's approach

Generali have a full suite of standard written communications to meet the majority of policyholders' needs. These are fit for purpose, but can be easily adapted to take into account individual circumstances.

Policyholders receive an annual information pack on their pension pot, as well as a reminder of their investment options. Retirement options are highlighted with further support signposted.

The full suite of documents is reviewed at least every five years to ensure ongoing compliance and relevance.

Policyholders need to contact Generali directly if they require further information regarding their policy. Contact information can be found on correspondence.

All changes need to go through Generali as there is no online facilities to manage documentation or amendments. If members wish to switch investment these are done by writing (with signature witnessed).

Information on charges is shared online and is available on request.

## Comparator results

We have assessed how the communication materials provided to the Firm's policyholders compare to other sufficiently similar employer pension arrangements. This takes account of the nature of the provider.

This assessment identified that the communication materials provided to the Firm's policyholders over 2024 were below average relative to the comparator group.

## Areas for improvement

### GAA observations

As stated elsewhere, the content of the investment bulletin should be reviewed to better communicate details of the investment options and how they are expected to perform. This is likely to be the primary point of contact with members, and therefore could include more signposting and useful information, such as warnings of scam activity, for example.

The GAA would like to see greater use of online communication and digital tools for members to utilise. However, we note that the current book of business may prohibit a cost effective roll-out.

## 4. Firm governance

Value score:

Excellent

Good

Satisfactory

Poor

### What are we looking for?

We would expect to see a comprehensive governance structure in place, including regularly reviewed Terms of Reference for key committees, with clearly defined scope and responsibilities.

We also expect to see evidence that committees that have been actively operating throughout the year, with meeting minutes or packs showing that key elements of their remit have been addressed. In addition, the submission of any Vulnerable Customer Policy and clarification of management responsibilities further strengthens the governance framework, highlighting a commitment to ensuring that customer needs—particularly those of vulnerable individuals—are considered in strategic and operational decisions.

There should also be a transparent and documented process for appointing and monitoring service providers, supported by evidence of regular reviews and updates where necessary to maintain alignment with policyholder interests.

### The Firm's approach

The Firm has a formal governance structure in place with clearly defined organisation chart and list of responsibilities. The Finance, Investment and Reserving Subcommittee ('FIR') is responsible for the investment oversight including of the

pension products, working within the set Terms of Reference. A Sustainability Committee (ensuring the integration of **ESG** factors in the decision-making processes and investment strategies) is also in operation. The Product Committee has overall responsibility for the suitability of the pension products. The governance structure is reviewed annually.

The Firm uses a third party, Generali Asset Management S.p.A. SGR, for asset management which is regulated in Italy. This company is responsible for the appointment and review of the underlying managers used within the white-labelled funds. There is a mandate in place with the asset manager which is reviewed by the FIR. Service levels are reviewed at Group level.

The core UK pensions team is modest in size, reflecting the scale and nature of the business and that investments are managed elsewhere within the Group. The current Terms of Reference for both the main governance committee and the product sub-committee demonstrate a clear framework for oversight and decision-making.

## Areas for improvement

### GAA observation

We note that there is a small core UK team that administer these policies, which represents key person risk for the Firm. Consideration should be given to succession planning and continuity of service to customers.

## 5. Security of policyholder benefits

**Value score:**

Excellent

Good

Satisfactory

Poor

### What are we looking for?

We expect to see that the Firm is in a sound financial position with sufficient capital backing to enable it to continue to operate for the foreseeable future.

We also look for information about how the assets are protected, for example in the event of fraud or bankruptcy, at both the Firm and investment manager level. For example, this could relate to FSCS or other regulatory protections, ringfencing or the structure of the underlying product.

We are looking for evidence that the Firm has processes in place for protecting policyholder assets against fraud and scams and for Firms to be actively monitoring for possible scamming activity.

If policyholders wish to transfer their benefits elsewhere, then pensions can only be transferred to authorised pension providers with requests reviewed by the administration team on a case-by-case basis. Individuals must contact and speak with representatives at Generali for any such requests.

Checks are undertaken by the team on policyholders who wish to exit early. However, neither the transfer pack available to policyholders nor the annual investment bulletin include detailed scam warning information. Generali have training available for the team about how to identify and engage with vulnerable customers. The Firm's accompanying Vulnerable Customer Policy, which was previously in draft form, has now been completed

### The Firm's approach

The Firm, Generali UK, is the UK representative office of Assicurazioni Generali S.p.A. which is regulated under EU Insurance regulation. We have no concerns about the financial strength of the Firm.

The policyholders have financial protection in place via the Financial Services Compensation Scheme (FSCS), which is uncapped. Investments are ring fenced to be separate from Generali, with BNP Paribas acting as custodian. There were no material client money (CASS) breaches reported to the FCA during the year.

## Areas for improvement

### GAA challenges

We expect there to be greater awareness of and information provided to policyholders on how to protect themselves against scams. With financial scams becoming more prevalent, we expect efforts to be made to protect customers. This should involve more education and information being shared with policyholders.



## 6. Administration and operations

**Value score:**

Excellent

Good

Satisfactory

Poor

### What are we looking for?

We expect Firms to have robust administration processes in place with appropriate service standard agreements and regular monitoring and reporting around adherence to those service standards. In particular, we are seeking evidence that **core financial transactions** are processed promptly and accurately, such as processing contributions, transfers processing and death benefit payments.

We look for evidence of regular internal and external assurance audits on controls and administration processes. In particular, we are looking for a robust risk control framework around the security of IT systems, data protection and cyber-security. We would expect to see evidence that cyber-security is considered as a key risk by the Firm's relevant risk governance committee and that appropriate monitoring, staff training and penetration testing is put in place.

We expect Firms to have a comprehensive Business Continuity Plan (BCP) and evidence of its effectiveness through appropriate testing.

We would expect to see a low level of substantive complaints and demonstration of a clear process for resolving complaints.

### The Firm's approach

The administration team for these pension products is based in-house, in the UK, and work to a target Service Level Agreement (SLA) of 5 working days for key financial tasks. The core financial transactions include transfers, change of investment options and surrender of policies.

Other tasks include responding to correspondence and member queries, such as change of address and change of policy details. These also operate within a 5 day target.

Generali UK has a BCP in place which was tested successfully during the year. The BCP includes details of key roles and responsibilities. The BCP is reviewed and updated at least annually.

The Firm's IT infrastructure has achieved ISO accreditation and has an accompanying IT Security Policy, which is reviewed each year. The Firm also conducts penetration testing via an external company called Elixir to enhance IT robustness.

There is a well-documented complaint process in place, with guidance to the administration team on how to escalate cases, if appropriate.

## The Firm's strengths

All core financial transactions and administrative tasks related to the management of customer policies were completed during the year. However, there were only a limited number of transactions, which is reflective of the customer base.

The Firm reported the following service level performance for 2024: transfers to other providers had a target of 5 working days, with two thirds completed within the SLA; settlements to beneficiaries also had a 5-day target, with all completed within SLA; there were no contributions paid during the year due to the closure of policies. The SLA performance was 86% for the year. Whilst the percentage is skewed by the small number of tasks overall it is slightly disappointing that the score was not higher given there were so few core financial transactions.

In addition there were a total of 15 enquiries during the year, which were all completed within target.

No complaints were received in relation to the pension products, and the Firm advised the GAA that it is not aware of any personal data breaches occurring during the year. The Firm has a formal approach in place for resolving complaints, as well as a complaints policy, both of which were reviewed during the year.

IT security is robust and phishing testing was conducted during the year.

## Comparator results

We have assessed how the quality and timeliness of the administration services, including the core financial transaction processing, provided to the Firms policyholders compare to other sufficiently similar employer pension arrangements.

This assessment identified that the administration services provided to the Firm's policyholders over 2024 were average relative to the comparator group.

## Areas for improvement

### GAA observations

The GAA noted that the administration team has a target for key tasks, including core financial transactions, of 5 working days. This target is arguably more relaxed compared to the wider market, where automation and straight through processing is often available. That being said, the service levels are regularly being met on the majority of tasks within this 5-day target. The Firm may wish to explore greater levels of automation and reliance on technology where possible to improved member services and mitigate the key person risk run by having a small pensions team.



## 7. Engagement, innovation and improvements for policyholder experience

**Value score:**  Excellent  Good  Satisfactory  Poor

### What are we looking for?

We expect to see evidence that the product is reviewed on a regular cycle of not more than every three years, with new product features or service innovations being launched when appropriate and in line with relevant improvements being made to other similar products being offered by the Firm. We expect these changes to have been developed taking into account policyholders' characteristics, needs and objectives, including direct feedback from policyholders.

We are looking for evidence of regular, proactive engagement with policyholders to obtain feedback and for this feedback to be taken into account when reviewing the product offering.

### The Firm's approach

The Firm welcome ongoing feedback from policyholders and there is opportunity for comments to be raised directly. However, the Firm has advised that, given the size of the pension business and the closed nature, the time and cost of innovating new pension products is likely to outweigh the benefits to members. As such the Firm have no near term plans to make any innovative changes to the pension products on its books nor to engage members formally and collect feedback.

### Areas for improvement

#### GAA observations

The GAA acknowledges that policyholder engagement and development of new pensions-specific products will be very limited going forward for the reasons outlined above. However, the wider Generali group may continue to innovate in customer services or online functionality, and the GAA encourages the Firm to consider if such developments would be positive to adopt for pensions policyholders.

## 8. Cost and charge levels

**Value score:**  Low  Moderately Low  Moderately High  High

### What are we looking for?

The GAA has considered the overall level of charges borne by policyholders over the year. This included assessing:

- | the annual fund management and administration charges being borne by policyholders;
- | the transactions costs incurred by the underlying investment funds which reduce the investment return experienced by policyholders;
- | any other charges being paid by policyholders to manage and administer their workplace pensions;
- | the Firm’s process for collecting and monitoring overall member charges, including [transaction costs](#).

We expect fund management charges to be comparable to charges for similar investment products in the wider pensions market after considering the active or passive nature of the investment and the type of assets involved. We take into account where the majority of [relevant policyholder](#) assets are invested.

In looking at transaction costs we also consider the overall level of volatility in the markets, recognising that in highly volatile markets transaction costs may increase.

We assess whether the overall level of administration charges are reasonable, bearing in mind the types of services provided to policyholders. For products which are used for

providing auto enrolment pensions we consider the government required charge cap.

Whilst we have considered the average total costs and charges payable by policyholders we have also noted where there may be significant outliers such as higher or disproportionate charges for small pots.

Further information on the required disclosures relating to costs and charges payable by the Firms policyholders can be found in Appendix A.

### The Firm’s approach

The pension products carry a single flat fee for policyholders which covers both administration of the policies and the costs of the underlying investments. The fees vary, subject to the investment option selected. Fees are shown below are at the end of the assessment period:

Pension Product	Annual Charges Payable by Members
Generali UK Equities	0.60%
Generali European Equities	0.45%
Generali Japanese Equities	0.25%
Generali US Equities	0.45%
Generali Fixed Interest	0.75%
Generali Money	0.04%
Generali Balanced Managed	0.55%

*Note: the Generali Balanced Managed Fund invests in underlying white-labelled funds. There is no additional charge for this Fund and the fee payable by customers is a function of the average weighted by fund holdings.*

Charges are clearly disclosed online. The level of charges are reviewed periodically by the Product Committee for their ongoing suitability.

Transaction costs incurred by the underlying asset managers are not passed on to policyholders by way of additional charges. They are accounted for within the unit price of the white-labelled funds, and therefore act as a modest drag on performance, meaning that the only direct charges that members pay are those disclosed in the table. Transaction costs are suitably controlled but active manager mandates or with tilts towards more **ESG** focused funds may lead to elevated costs. However, we note that the transaction costs incurred by the fund managers during the year were reasonable.

## Pre-1988 Personal Pensions

This report is focused on the Generali Personal Pension Policies. However, there are also a small number of personal pensions that invest in these products and were taken out prior to 1988. These legacy non-workplace policies incur the same charges as noted above but with additional fees. These additional fees include an annual fee (3% of the initial units allocated to the policy which are those allocated from premiums received in the first two years) and an administration fee (£1.00 per month) deducted from the accumulation units allocated to the policy i.e. units allocated from premiums received following the second anniversary of the policy.

If we were to rate the fee levels paid by this small group of policyholders we would consider them to be moderately high, noting that these policyholders do not receive any additional benefits or services for these additional fees.

## Comparator results

We have assessed the overall cost and charge levels payable by the Firm's policyholders in comparison to policyholders of other sufficiently similar employer pension arrangements. This takes account of the nature of the provider.

This assessment identified that the overall cost and charge level paid by the Firm's policyholders over 2024 were average relative to the comparator group.

## Areas for improvement

The GAA noted no further comments.



# ESG financial considerations, non-financial matters and stewardship

## What are we looking for?

Where the Firm has an investment strategy or makes investment decisions which could have a material impact on policyholders' investment returns, the GAA will assess the adequacy and quality of the Firm's policy in relation to [ESG](#) financial considerations, non-financial matters and stewardship. The GAA will consider how these are taken into account in the Firm's investment strategy and investment decision making. We will also form a view on the adequacy and quality of the Firm's policy in relation to stewardship.

We expect the Firm's policy in relation to these considerations:

- (a) sufficiently characterises the relevant risks or opportunities;
- (b) seeks to appropriately mitigate those risks and take advantage of those opportunities;
- (c) is appropriate in the context of the expected duration of the investment; and
- (d) is appropriate in the context of the main characteristics of the actual or expected [relevant policyholders](#).

We also expect that the Firm's processes have been designed to properly take into account the

risks and opportunities presented.

Where ESG considerations have been delegated to external investment managers we expect the Firm to have a suitable oversight and stewardship process in place.

Whilst this formal requirement falls outside the overall Value for Money assessment, the GAA's Value for Money framework does take into account, where relevant, when scoring the area of Product Strategy Design and Investment Objectives on page 9, how the Firm has integrated ESG financial considerations and non-financial matters in the Firm's investment strategy and investment decision making.

## The Firm's approach

Generali take ESG considerations seriously and have a holistic annual integrated report that sets out their business commitments.

ESG and stewardship criteria is considered by Generali Investments in their asset manager selection process. A number of the underlying asset managers used within the white-labelled funds have a specific ESG or a responsible investing focus, despite this not being specific within the investment mandate.

## Areas for improvement

The GAA considers the policies to be adequate.



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## Appendix A: Administration charge and transaction cost disclosures

The FCA requires that administration charges and transactions costs, in relation to each [Relevant Scheme](#) must be published by 30 September, in respect of the previous calendar year and be available for free on a publicly accessible website. These disclosures must include the costs and charges for each default arrangement and each alternative fund option that a member is able to select. They should also include an illustration of the compounding effect of the administration charges and [transaction costs](#), on a prescribed basis and for a representative range of fund options that a policyholder is able to select.

The Firm has compiled these disclosures and compounding illustrations, which are provided on a publicly accessible website at [Pensions and Investments - generali.co.uk](#)

# Appendix B: Approach to comparisons

The FCA requires that a comparative assessment be made of certain sub-features of the Value for Money assessment. The GAA is required to compare the Firm's offering against a selected group of other similar product options available in the market based on publicly available information. If an alternative scheme(s) would offer better value, we must inform the pension provider.

ZEDRA's GAA operates for a number of Firms, all of whom have agreed that the GAA can make use of the data we have gathered on their offerings to carry out the required comparisons this year. This is done on an anonymised basis.

## How the comparators were selected

The GAA has selected a number of comparator products that we determined are sufficiently similar products so as to be comparable to those provided by the Firm for this purpose. The selection was based on the following broad criteria:

- | Type of product i.e. whether accumulation or pathways, and within accumulation whether the product is a SIPP or workplace group personal pension
- | Products where Firms provide similar services, for example whether the provider has responsibility for setting and monitoring the investment strategy

Based on these criteria we believe that the comparator products chosen will provide a reasonable comparison for the policyholders of the Generali workplace accumulation pension.

## Comparison of Net Investment Performance

We have assessed how the net of fees investment performance provided to the Firm's policyholders compares to other similar employer pension arrangements. This takes account the performance of the investments being offered. Where multiple investment funds are made available, we have taken into account the amount invested by [relevant policyholders](#) in each fund.

## Comparison of Communication provided to policyholders

We have assessed how the full range of communication materials, including any websites and modelling tools, provided to the relevant policyholders compares to other sufficiently similar policyholder arrangements. This takes account of the type of pension product provided, and whether the communication materials are fit for purpose considering the age profile of the relevant policyholders.

## Comparison of Administration Services

We have assessed how the quality and timeliness of the administration services, including the core financial transaction processing, provided to the Firm's policyholders compares to other sufficiently similar employer pension arrangements.

## Comparison of costs and charges

We have undertaken the comparison of cost and charge levels considering three categories of charges:

- | Annual administration and investment fund charges
- | Transaction costs
- | Other costs and charges

We have assessed the overall cost and charge levels payable by the Firm's policyholders in comparison to policyholders of other sufficiently similar employer pension arrangements. This takes account of the type of product provided. The costs of services that are provided directly to the policyholder and paid for separately by the policyholder (for example financial or investment advice) are not included.



# Appendix C: GAA activities and regulatory matters

This section describes the work that the GAA has done over the year and also covers the other matters which we are required to include in our annual report.

## GAA engagement and actions this year

We prepared and issued a request for data on all the relevant workplace pension policies in early 2025.

Members of the GAA met with representatives of the Firm to kick off the Value for Money assessment process for the 2024 calendar year and to discuss and agree timescales.

We subsequently had a meeting with representatives of the Firm to discuss the information that had been provided in response to the data request. This was an opportunity for members of the GAA to meet key personnel with responsibility in the various different areas including investment strategy and how this has evolved, fund range including design of defaults, investment governance, approach to [ESG](#), non-financial matters and stewardship, administration and communications and risk management. In some cases this meeting was virtual.

We discussed the GAA's provisional scoring of Value for Money of the Firm's in-scope workplace pensions and the approach for meeting the cost and charges disclosure requirements in [COBS](#) 19.5.13.

As part of the Value for Money assessment process, the Firm has provided the GAA with all the information that we requested, including evidence in the form of minutes and other documentation to support areas of discussion at the site visit. In particular, the GAA has seen evidence of ESG integration within the Firm's investments via the selection of several asset managers.

Over the last year the GAA reviewed our Value for Money assessment framework and scoring methodology to ensure this continued to be suitable and can be applied consistently. Whilst the Value for Money assessment framework itself remains largely unchanged from the previous year, work was undertaken to improve the data request to make the overall process more efficient.

The GAA documents all formal meetings with the Firm and maintains a log which captures any concerns raised by the GAA with the Firm, whether informally or as formal escalations.

The key dates are:

Item	Date
Issue data request	20/01/2025
Kick-off meeting	13/02/2025
Site visit	01/04/2025
Gaa panel review meeting	01/05/2025
Discussed provisional scoring	08/05/2025
Gaa comparator and moderation meeting	24/06/2025

## The arrangements put in place for policyholders' representation

The following arrangements have been put in place to ensure that the views of policyholders can be directly represented to the GAA:

- | The role of the GAA and the opportunity for policyholders to make representations direct to the GAA has been and will continue to be communicated to policyholders via the Generali website and the annual investment bulletin.
- | The Firm will receive and filter all policyholder communications, to ensure that this channel is not being used for individual complaints and queries rather than more general representations which may be applicable to more than one policyholder or group of policyholders. Where the Firm determines that a communication from a policyholder is a representation to the GAA, it will be passed on in full and without editing or comment for the GAA to consider.

In addition, the GAA has established a dedicated inbox at [zgl.gaacontact@zedra.com](mailto:zgl.gaacontact@zedra.com) so that policyholders can make representation to the GAA directly. The Firm has included details of this contact e-mail address on [www.generali.co.uk/What-we-do/Pensions-and-Investments.html](http://www.generali.co.uk/What-we-do/Pensions-and-Investments.html)

## Appendix D: ZEDRA GAA credentials

In February 2015 the Financial Conduct Authority (FCA) set out new rules for providers operating workplace personal pension plans (called [relevant schemes](#)) to take effect from 6 April 2015. From that date, providers had to have set up an Independent Governance Committee or appointed a Governance Advisory Arrangement whose principal functions is to:

- | Act solely in the interests of the [relevant policyholders](#) of those pension plans, and to
- | Assess the “value for money” delivered by the pension plans to those relevant policyholders.

These requirements were then extended to Firms providing investment pathways from 1 February 2021.

The FCA rules require that the Chair of each Independent Governance Committee and Governance Advisory Arrangement produce an annual report setting out a number of prescribed matters.

The ZEDRA Governance Advisory Arrangement (“the GAA”) was established on 6 April 2015 and has been appointed by a number of workplace personal pension providers and investment pathways providers. ZEDRA is a specialist provider of independent governance services primarily to UK pension arrangements. Amongst other appointments we act as an independent trustee on several hundred trust-based pension schemes and we sit on a number of IGCs. More information on the ZEDRA GAA can be found at [www.zedra.com/GAA/](http://www.zedra.com/GAA/)

The members of the ZEDRA GAA are appointed by the Board of ZEDRA Governance Ltd. The Board is satisfied that individually and collectively

the members of the GAA have sufficient expertise, experience, and independence to act in the interests of [relevant policyholders](#) and [pathway investors](#).

The Board of ZEDRA Governance Ltd has appointed ZEDRA Governance Ltd to the GAA. The majority of ZEDRA Governance Ltd’s Client Directors act as representatives of ZEDRA Governance Ltd on the GAA.

The Board of ZEDRA Governance Ltd has also appointed Dean Wetton, acting on behalf of Dean Wetton Advisory UK Ltd, to the GAA. Dean Wetton and Dean Wetton Advisory UK Ltd are independent of ZEDRA.

The Board of ZEDRA Governance Ltd has appointed either a specific named Client Director of ZEDRA Governance Ltd or Dean Wetton of Dean Wetton Advisory Ltd to act in the capacity of Chair of the GAA in respect of each Firm.

More information on each of ZEDRA’s Client Directors, their experience and qualifications can be found at [www.zedra.com/people/](http://www.zedra.com/people/)

Information on Dean’s experience and qualifications can be found at [www.deanwettonadvisory.com](http://www.deanwettonadvisory.com)

The GAA has put in place a conflicts of interest register and maintains a conflicts of interest policy with the objective of ensuring that any potential conflicts of interest are managed effectively so they do not affect the ability of ZEDRA Governance Ltd or Dean Wetton Advisory Ltd to represent the interests of relevant policyholders or pathway investors.

The terms of reference for the GAA agreed with the Firm can be found at: [Pensions and Investments - generali.co.uk](http://Pensions and Investments - generali.co.uk)

# Appendix E: Glossary

*Please note that some of the terms referred to in this glossary may not be applicable to your product.*

## Active management

The investment of funds where the skill of the fund manager is used to select particular assets at particular times, with the aim of achieving higher than average growth for the assets in question.

## Annual management charge (AMC)

A deduction made by the pension provider or investment manager from invested assets, normally as a percentage of the assets. The AMC is generally how the pension provider or investment manager is paid for their services.

## Annuity

A series of payments, which may be subject to increases, made at stated intervals, usually for life. If the annuity is “joint life”, it will continue to a spouse (usually at a lower rate) after the death of the original person receiving the payments (“the annuitant”).

## COBS

The Conduct of Business Sourcebook prepared by the Financial Conduct Authority (FCA). In particular when we use COBS in this report we are referring to Chapter 19 of the COBS which sets out the provisions relevant to the Value for Money Assessment of workplace pensions.

## Core financial transactions

The essential processes of putting money into a pension policy or taking it out, namely:

- | Investment of contributions
- | Implementation of re-direction of future contributions to a different fund
- | Investment switches for existing funds, including life-styling processes
- | Settlement of benefits – whether arising from transfer out, death or retirement

## Decumulation

The process of converting pension savings to retirement income.

## Environmental, social and governance (ESG)

These are the three main factors looked at when assessing the sustainability (including the impact of climate change) and ethical impact of a company or business. ESG factors are expected to influence the future financial performance of the company and therefore have an impact on the expected risk and return of the pension fund investment in that company.

## Flexible access

This refers to accessing pension savings in the form of income and/or lump sums. Pension savings that are not being accessed immediately will generally remain invested.

## Life-styling

An automated process of switching investment strategy as a policyholder approaches retirement, in a way that is designed to reduce the risk of a policyholder's retirement income falling.

## Net investment performance

The investment performance of the fund after deducting all asset management charges, administration charges, taxes and fees for managing the fund including any transaction costs.

## Pathway investor

A retail client investing in a Firm's pathway investment offering.

## Pathway investment

A drawdown fund which is either a capped drawdown pension fund or a flexi-access drawdown pension fund.

## Relevant policyholder

A member of a Relevant Scheme who is or has been a worker entitled to have contributions paid by or on behalf of his employer in respect of that Relevant Scheme.

## Relevant Scheme

A personal pension scheme or stakeholder pension scheme for which direct payment arrangements are, or have been, in place, and under which contributions have been paid for two or more employees of the same employer.

## Transaction costs

A combination of explicit and implicit costs included within the price at which a transaction (i.e. buying or selling an asset) takes place.

## With Profits

An insurance contract that participates in the profits of an insurance company. The insurance company aims to distribute part of its profits to with-profits policy holders in the form of bonuses.

## Unit-Linked

A type of investment where the investments of a number of people are pooled together and divided into units of equal value. The value, or price, of each unit depends on the value of the assets of the unit linked fund. The unit price determines the number of units the policyholder receives when they invest money in the fund, and the sum they receive when they sell their units.



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