

ETHICAL CODE FOR SUPPLIERS OF THE GENERALI GROUP



Introduction

Over the past few years the **Generali Group** has decided to strengthen its commitment on social responsibility issues. Following this decision it has joined international initiatives such as UN Global Compact, the Principles for Responsible Investment and the Carbon Disclosure Project. The Group Environmental Policy and the human rights principles, to which the Code of Conduct refers, have been defined; with reference to both, specific risks and opportunities on the mana- gement of relations with contract partners have been identified.

Hence the need to explain to suppliers/contractors Generali's approach on the most important social and environmental topics, and to explain them the Group's rules of conduct in these fields. The establishment of a network based on long-lasting and mutually satisfactory relations with suppliers/contractors – with the aim of ensuring high quality products and services – is a strategic objective for the Group and builds competitive success.



Supplier's Policies

This document outlines the general principles that have to underpin fruitful relations with contract partners.

The Group requires its contract partners to align with its policies while performing business and to ensure compliance with all the levels of the relevant supply chain.

The Generali Group is committed to performing its business with contract partners by complying with the following principles:

1. Correctness and honesty

The Generali Group works in compliance with the current legislation, professional ethics and internal rules. Generali does not accept any form of corruption, extortion or misappropriation.

2. Transparency and impartiablity

Contract partners are selected by means of clear, transparent, reliable and non-discriminatory procedures, by solely using objective, documentable, and transparent criteria. The Group is committed to promptly giving all the suppliers and potential suppliers access to the information needed to identify the goods and services to be provided, and to any changes or additions to supply specifications.

3. Avoiding conflict of interests

Relations between Generali Group companies and its contract partners are governed by objective criteria. Under no circumstances shall the personal relations or interests of employees influence the award of a contract or an order. No employee can directly or indirectly draw any personal benefit from the award of a procurement contract. Consequently, any benefit or present given or received that may be intended as a tool influencing the independent judgment or conduct of the parties involved shall be forbidden.

4. Fair competition

The Group shall promote fair and equitable competition among its suppliers, which is intended as a tool to select the best Group suppliers and to improve the quality of the purchased go- ods and services under satisfactory contract terms. In its relations with suppliers the Generali Group shall comply with the sustainability principle.

It shall therefore behave as impartially as possible and shall not abuse its dominant position. It shall also attach primary importance not to promote the creation or continuation of dominant positions or economic dependence of contract partners



5. Confidentiality

The Group shall keep suppliers' information confidential and shall refrain from looking for confidential data, unless it is explicitly authorized to do so in compliance with the regulations in force. The Group employees are forbidden to use confidential information provided by suppliers for any purpose which is not related to the performance of their duties.

6. Workers protection

Suppliers shall operate in line with the principles stated in this document. They shall strictly comply with all national and international applicable rules and regulations, including the Fundamental ILO Conventions, the UN Universal Declaration of Human Rights, and the rules and standards of the relevant business sectors.

In particular, suppliers shall acknowledge the rights of their employees and treat them with dignity and respect. They shall be committed to:

- not using nor tolerating the use of child, forced, obliged or undeclared labour;
- not implementing nor tolerating any form of discrimination based on nationality, gender, racial and ethnical origins, religious beliefs, political opinions, age, sexuality, disability or health in recruitment and remuneration policies, access to training, career development, dismissal or staff retirement;
- granting the staff the right to set up and join trade union organisations of their own choice and to hold collective negotiations with the company in line with the rules, practices and cultures of the various countries;
- **ensuring** a safe and healthy working environment and adopting suitable measures to prevent any accident or damage to workers' health;
- **complying** with the laws and standards applicable in the relevant business sector on wor- king hours and public holidays;
- respecting the staff's right to decent remuneration;
- · providing suitable staff training.



7. Environmental protection

Generali also requires its suppliers to promote environmental safeguard by minimising the impact of their business through an efficient use of natural resources, preference to renewable energy, correct waste disposal and greenhouse gases reduction.

Compliance with suppliers' requirements shall be ensured by means of suitable monitoring procedures, that will also have to take account of the risk profiles of the different suppliers categories.

In the event of non-compliance with the above-mentioned principles, the Generali Group shall first and foremost seek a solution with the contract partner through dialogue. Should an agreement fail to be achieved or serious non-compliance occurs, the Generali Group shall apply the necessary sanctions that may go as far as the termination of the contract