

## 采购政策

### Purchasing policy

与合同合伙人的关系受以下文件管辖：

Relations with contractual partners are governed by the following documents:

- 2011 年 12 月集团公司董事会批准的《通用集团供应商道德规范》；
- Ethical Code for suppliers of the Generali Group, approved in December 2011 by the Board of Directors of the parent company;
- 2014 年批准的采购行为准则指南
- The Code of Conduct Guidelines for Procurement, approved in 2014;
- 2018 年一个采购集团内部指南，以解决和协调集团范围内的采购实践；以及
- An internal One Procurement Group Guideline in 2018, to address and harmonize group wide Procurement practices; and
- 与集团行为准则密切相关的集团内部政策，旨在确保对当前和未来外包活动进行适当管理。
- An internal Group Policy, which is closely linked to the Group's Code of Conduct, designed to ensure the proper management of current and future outsourced activities.

在《通用集团供应商道德规范》中，我们规定了如何应对和管理与供应商关系管理相关的风险和机遇。这旨在确保供应链在人权和劳工权利、反腐败和环境方面的完整性，我们在所有活动中都努力遵守这些原则。为此，规定了必须与合同伙伴建立良好关系的基础原则：公平和诚实、拒绝一切形式的腐败、透明和公正、防止利益冲突、公平竞争、保密、保护工人和环境。

In the Ethical Code for Suppliers of the Generali Group, we have set out how risks and opportunities relating to the management of relationships with suppliers should be addressed and managed. This is aimed at ensuring the integrity of the supply chain with regard to principles on human and labor rights, anti-corruption and the environment, which we strive to adhere to in all our activities. To this end, the Code specifies the general principles that must form the foundation for good relations with contractual partners: fairness and honesty, rejection of all forms of corruption, transparency and impartiality, prevention of conflicts of interest, fair competition, confidentiality, protection of workers and the environment.

此外，Generali Group 还采取了预防金融犯罪的政策和程序，并实施了自动控制，以减轻贿赂和腐败、金融制裁和洗钱风险。这些政策包括集团国际制裁政策、反洗钱和反恐怖主义融资政策、反贿赂和反腐败集团指南以及相关实施措施。集团层面实施的自动控制包括针对制裁、恐怖主义、声誉风险、政治曝光个人和内部名单对供应商进行筛选。还采取了其他控制措施，例如银行账户支票。

In addition, Generali Group has adopted policies and procedures to prevent financial crime as well as implementing automatic controls in order to mitigate bribery and corruption, financial

sanctions and money laundering risks. Those policies include the Group International Sanctions Policy, the Anti-Money Laundering and Counter Terrorism Financing Policy, the Anti-Bribery and Anti-Corruption Group Guideline and the related implementing measures. The automatic controls implemented at group level include the screening of the suppliers against sanctions, terrorism, reputational risk, politically exposed individuals and internal lists. Other controls have been adopted such as bank account checks to give just one example.

我们希望我们的合同合作伙伴：

We expect our contractual partners to:

- 按照集团政策行事，确保其供应链的各个层面都符合要求；
- act in accordance with Group policies and ensure compliance at all levels of their supply chain;
- 按照文件规定的原则运作：公平和诚实、透明和公正、防止利益冲突、公平竞争、保密、保护工人和环境；
- operate according to the principles set out in the document: fairness and honesty, transparency and impartiality, prevention of conflicts of interest, fair competition, confidentiality, protection of workers and the environment;
- 在国家和国际一级遵守所有适用的法律和条例，包括《国际劳工组织基本公约》、《联合国世界人权宣言》以及各业务部门的规则和标准。
- comply with all applicable laws and regulations, both at a national and international level, including the Fundamental Convention of the International Labour Organization (ILO), the United Nations Universal Declaration of Human Rights and the rules and standards of the respective business segments.

我们要求内部人员：

We ask our internal people to:

- 遵守集团价值观和集团标准，详见我们的指南和程序
- commit to Group Values and Group Standards as detailed in our guidelines and procedures
- 参加特定的培训课程，以充分理解和承认适用法律和集团标准的内容
- undertake specific training courses to fully understand and acknowledge the content of applicable laws and Group Standards
- 以上所有内容均适用于合作伙伴
- all above mentioned for partners

已发布具体采购程序，为员工提供关于如何管理供应商管理流程（资格认证、风险评估、供应商绩效评估）和如何管理采购程序（谈判类型、参与采购活动的供应商数量、评估标准、授予规则、合同管理）

Specific procurement procedures have been published to provide employees with clear instructions on how to manage Vendor Management processes (qualification, risk assessment, supplier performance evaluation) and how to manage sourcing procedures (type of negotiations, number of suppliers to be involved in sourcing events, evaluation criteria, awarding rules, contract management)

考虑到不同供应商类别的风险状况，通过适当的监控程序确保遵守我们对供应商的要求。

Compliance with the requirements that we request of our suppliers is ensured through appropriate monitoring procedures that take into account the risk profiles of different supplier categories.

如果发现不符合上述原则的情况，Generali Group 将与合同伙伴合作，通过密切合作和沟通找到解决方案。如果无法达成协议，或发现严重违约，集团将实施适当的制裁，甚至取消合同。

If instances of non-compliance with the above principles are detected, Generali Group collaborates with the contractual partner to find a solution through close co-operation and dialogue. Where an agreement cannot be found, or if serious breaches are discovered, the Group will impose appropriate sanctions, that may go as far as cancellation of the contract.

在由负责采购或与供应商有业务关系的所有集团员工签署的《采购行为准则》中，我们正式制定了关于防止利益冲突和任何形式腐败的严格行为标准和准则，以及关于接受和/或提供何种类型礼品以及处理和使用保密信息的规定。这些规定已在我们开展业务的各个国家得到实施，同时也考虑到了当地的立法和做法。

In the Code of Conduct Guidelines for Procurement, signed by all Group employees who are responsible for purchasing or who have business relationships with suppliers, we have formalized strict standards of conduct and instructions regarding the prevention of conflicts of interest and any form of corruption, as well as regulations concerning the acceptance and/or offering of gifts of any kind, and the handling and use of confidential information. These provisions have been implemented in the various countries where we operate, also taking account of local legislation and practices.

为了便于举报违反规章制度的行为，甚至潜在违规行为，公司提供了以下沟通渠道：

电话：800-711-1329；800-110-1252

Tel: 800-711-1329；800-110-1252

The Company, in order to facilitate reports of violations of the Model, even potential, provides the following communication channels:

电邮：EAGlobalCompliance@europ-assistance.com

Email: [EAGlobalCompliance@europ-assistance.com](mailto:EAGlobalCompliance@europ-assistance.com)

在集团外包政策中，我们已经为活动和与合作伙伴的关系制定了规则和指导方针，必须以结构化和合规的方式在所有集团实体中进行管理。该文件规定了适用于我们开展业务的所有国家的基本原则和强制性最低标准，分配了关键责任，并确保适当的控制和适当的管理结构。

In the Outsourcing Group Policy, we have established rules and guidelines for activities and relationships with partners, which must be managed in a structured and compliant way across all Group entities. The document sets out the basic principles and the mandatory minimum standards that apply in all countries in which we operate, assigning key responsibilities and ensuring appropriate controls and adequate management structures.

我们定期分析所有流程，以检查它们是否都符合关键标准，并确保没有利益冲突。

We analyze all processes on a regular basis, to check that they all meet critical standards and ensure that there is no conflict of interest.