



SUPPLIER CODE OF CONDUCT

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Introduction

Reale Group acknowledges the importance of ensuring compliance with applicable rules and standards and with codes of conduct inside and outside the company, convinced as it is that regulatory compliance and business integrity are crucial to achieving goals that are founded upon proper business practices and professional competence.

Reale Group promotes responsible management of its own supply chain, which is also based on the principles of integrity, respect for roles and functions and the sharing of business management principles (please refer to the third paragraph “Principles” below), by its commitment to selecting suppliers who manage environmental and social impacts responsibly, who safeguard the rights of their workers and who promote these values also through their respective sub-supplier networks.

This Supplier Code of Conduct of Suppliers (hereinafter also the “Code” for short) represents an extension of Reale Group’s Code of Ethics (<https://www.realemutua.it/institutional/sostenibilita/codice-etico>), to which the Group’s suppliers shall adhere.

The aim of this document is to share Reale Group’s values with its suppliers and to define the rules of conduct, which they should take care to adopt in the management of commercial dealings with the Group.

Reale Group requires its suppliers to accept and abide by this Supplier Code of Conduct. By accepting this Code, Reale Group’s suppliers undertake to conduct themselves in conformity with the values and principles contained herein, or in conformity with the same or similar principles contained in the Code of Ethics. Reale Group’s suppliers shall ensure compliance with these principles and also undertake to ensure that their own sub-suppliers comply with these principles and that other parties operating on their behalf do the same. Compliance with the provisions of this Code should be evaluated by reference to the provisions of domestic and international laws, and also by reference to rules and standards applicable on a regional or local basis.

The principles provided for by the United Nations Global Compact (GC) represent the primary source used in drawing up this document; the GC is the world’s largest voluntary corporate citizenship initiative, which enables participating companies to advance principles that promote sustainable business activities worldwide. The UN Global Compact, more particularly, brings participating companies and organisations together to share, advance and apply within their own specific sectors a set of fundamental and universal shared principles in the areas of Human Rights, Labour, Environment, and Anticorruption. Reale Group subscribed to the United Nations GC in 2017, supporting and sharing its principles.

Management of dealings with Reale Group suppliers

Reale Group views the customer-supplier relationship as a proper partnership based on respect for the principles of professional and business ethics and for mutually applicable rules of ethical conduct.



Reale Group follows specific rules in the process of selecting and assessing suppliers, which provide guidance in:



identifying the specifications of the merchandise or service to be acquired;



applying market access procedures that enable dubious situations or favouritism to be avoided;



defining objective selection criteria;



complying with agreements entered into;



ensuring independent dealings with suppliers.

The development of a mutually satisfactory and lasting network of dealings with qualified suppliers is a key strategic goal of Reale Group, as well as being a factor that contributes to competitive success.

Principles ETHICS

Reale Group's suppliers should carry out their activities in accordance with ethical standards and act with integrity in accordance with the values and principles set forth in the Group's Code of Ethics.



Conflicts of interest

Reale Group's suppliers should avoid situations that indicate or appear to indicate a potential conflict of interest. When engaged in commercial dealings with Reale Group, suppliers should not in any circumstances attempt to take advantage of their personal relationship with Group employees. If an actual or potential conflict of interest is encountered, suppliers should promptly notify Reale Group.

Anticorruption

Reale Group suppliers should not give, offer or promise any direct or indirect payment - in cash or in any other form - with a view to securing or maintaining work opportunities, or in return for any other benefit, thus securing an undue advantage over other potential suppliers. Furthermore, suppliers should not in any circumstances attempt to influence Reale Group employees by offering them inappropriate gifts or hospitality/entertainment services.

Suppliers should ensure compliance with all applicable laws combating corruption, and should not tolerate any form of corruption, bribery, money laundering or extortion.

Fair competition

Reale Group suppliers should conduct their operations in accordance with the principles of fair competition, ensuring compliance with all applicable laws in this field. Suppliers should commit themselves to fair business practices, including the use of accurate, true and fair advertising.

Data Protection

Reale Group suppliers should respect their employees' data privacy and their data protection rights.

Furthermore, if suppliers during the course of their activities have access to the personal data of Reale Group employees, non-company collaborators, customers etc., they shall only collect and retain personal data that is legally permitted and that is necessary to enable them to conduct their activities, and they shall also put in place appropriate measures to protect said personal data.

Data confidentiality

All information pertaining to Reale Group is strictly confidential. Suppliers should not in any circumstances communicate sensitive information of Reale Group to third parties, unless specifically authorised.

Principles

LABOUR AND HUMAN RIGHTS

Reale Group suppliers should recognise the human rights of their workers and treat them with dignity and respect, also adopting ethical work practices and procedures.



Contratos legales

Los proveedores deben establecer relaciones laborales reconocidas con sus trabajadores, de acuerdo con las leyes nacionales e internacionales aplicables. Los proveedores no deben impedir que sus trabajadores disfruten de sus derechos legales y contractuales, garantizando

Legal contracts

Suppliers should establish recognised employment or work arrangements with their workers, in compliance with applicable domestic and international laws in force. Suppliers should not deny their own workers their legal and contractual rights, and they should guarantee them fairness, respect, dignity and equal opportunities and stamp out any form of abuse and/or pressure/threats of any kind. Workers should, in accordance with applicable laws, be free to withdraw from the employment/work contract or arrangement under which they were hired, without fear of retaliation or punishment.

Freedom of association

Suppliers should recognise the right of workers to participate in workers' organisations and in collective bargaining processes, should the workers so decide. Similarly, suppliers should encourage open communication on working conditions, so that workers will not fear retaliation or punishment in any form.

Forced labour and child labour

Suppliers should not resort to any forms of forced or coerced labour, involuntary prison labour, slavery or trafficking in human beings. They should ensure

that any employee is free to leave work freely, subject to giving reasonable notice. Suppliers should neither tolerate nor resort to child labour during any phase of the work activities. Therefore, no supplier should recruit persons who have not reached the minimum work age provided for by the laws of the country of reference.

Working hours

Reale Group suppliers should ensure that their employees' working hours do not exceed the maximum number of hours determined and permitted under applicable laws. Furthermore, suppliers should afford their workers weekly rest periods, annual holidays and national holidays, as well as maternity leave, sick leave and any other leave as and to the extent permitted by law. Overtime should be voluntary and should not be imposed on a regular basis.

Pay and benefits

Suppliers shall pay their employees for hours worked (including overtime and benefits due) in conformity with applicable laws or with collective labour agreements in force. Suppliers shall ensure that their workers receive decent, regular and adequate wages. Suppliers shall also ensure that contributions for their employees are paid on a regular basis.

Non-discrimination

Suppliers shall treat their employees with respect, dignity and fairness, ensuring equal opportunities for all.

Therefore, employees should not be subject to discrimination at any time or in any area of the employment relationship based, for example, on race, gender, sexual orientation, religion, nationality, age, political opinion, union affiliation, marital status, physical or mental disability, pregnancy, social or ethnic origin and any other personal state, status or characteristic.

Health and Safety

The activities and operations of Reale Group suppliers should guarantee the health and safety protection of their workers and of third parties, in compliance with domestic and international rules and with standards applicable in the area. Suppliers should take all steps to ensure that accidents and incidents at work are avoided. Suppliers should comply with all applicable workplace health and safety laws (for example, suppliers should put in place emergency prevention and response mechanisms, building-safety and fire-fighting systems, first aid equipment, personal protective equipment; they should ensure the safety of electrical equipment and installations, prevent noise pollution, ensure adequate lighting, ventilation, hygiene, access to drinking water and clean working environments and, in particular, bathroom facilities).

Principles ENVIRONMENT

Reale Group suppliers should undertake to protect the environment, complying with applicable regulatory provisions and standards and mandatory provisions on the environment and minimising the environmental impact of their activities (e.g. by the efficient use of natural resources, use of energy from renewable sources, reduction of greenhouse gas emissions, etc.).

Suppliers should also demonstrate that they have implemented an effective environmental policy, thus minimising any environmental impact.



Monitoring and reporting

Suppliers should keep, for the entire duration of the contract and for 5 years thereafter, documentation demonstrating compliance with the provisions of this Supplier Code of Conduct and also with applicable regulatory provisions in force.



Suppliers should ensure that Reale Group have access to such documentation, and provide information detailing compliance with the Code, if the Group so requests.

Reale Group reserves the right - using its own personnel or through third-party organisations assigned by the Group - to carry out checks/inspections of its suppliers (with or without prior notice) to ensure that they are complying with this Code of Conduct.

Reale Group expects its suppliers to promptly resolve any shortcomings or deficiencies discovered as a result of the aforementioned checks/inspections, by implementing suitable corrective measures.

Non-compliance with the Code may have the effect of terminating commercial dealings between Reale Group and its suppliers, if the latter are unable to show that they have put in place the necessary corrective measures within a reasonable period of time.

Suppliers are required to promptly notify Reale Group of any doubts they may have about any requirement or provision of the Code, and of any alleged or actual infringements of the Code of Conduct of Suppliers and/or of the law. This extends to infringements by any employee, consultant, partner or other representative acting in the name and/or on behalf of the supplier or of Reale Group.

The Code of Conduct for Reale Group suppliers was approved by resolution of the Board of Directors of the Company Reale Mutua di Assicurazioni on 18 December 2018. This was followed by the ratification by the Management Bodies of:

- Banca Reale S.p.A.: 24 January 2019
- Italiana Assicurazioni S.p.A.: 25 January 2019
- Reale Chile Seguros Generale S.A.: 28 January 2019
- Reale ITES s.r.l.: 18 February 2019
- Reale ITES ESP s.l.: 18 February 2019
- Reale Immobili S.p.A.: 18 February 2019
- Blue Assistance S.p.A.: 18 February 2019
- Reale Seguros Generales S.A.: 20 February 2019
- Reale Vida y Pensiones S.A.: 20 February 2019
- Italnex S.r.l.: 13 March 2019
- Igar S.A.: 14 March 2019.

