

Code of professional ethics between Groupama Asigurări and their suppliers



Groupama

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CODE OF PROFESSIONAL ETHICS BETWEEN GROUPAMA ASIGURĂRI AND THEIR SUPPLIERS

Groupama Asigurari SA undertakes to constantly observe the laws, rules and regulations applicable in the running of their operations. By adopting these values, we expect that all suppliers who intend to work with Groupama Asigurari to also adhere to the highest ethical standards. Groupama Asigurari requires that all suppliers should adopt the highest standard of transparency and integrity during the acquisition process and throughout the performance of their agreements. Suppliers or potential suppliers must strictly abide by the rules and regulations on the prevention and fight against corruption, money laundering and financing of terrorism.

1. BUSINESS VALUES AND PRINCIPLES OF GROUPAMA ASIGURARI

Groupama Asigurari („Groupama” or ”the Company”) is committed to observing the fundamental values governing their operations and to put them into practice every single day. Our code of ethics and professional conduct will help you understand what we deem to be accurate and inaccurate in the partnership relationships we establish with our suppliers.

Groupama is strongly committed to provide safe working conditions, to treat all their employees respectfully and with dignity, to carry out activities and operations respectful of the environment, in a climate of ethical conditions and moral integrity. In so far as the Groupama Suppliers are concerned, we deem as obvious that they abide by the laws, rules and regulations applicable to the areas where they operate. By making this commitment, Groupama Asigurari adopted a set of business values and principles to assess their current and potential suppliers of goods and services that the latter must abide by. Moreover, we expect our suppliers to use this document as a guide to implement their own principles – identical or comparable with those of Groupama – in our relationship with our sub-contractors and suppliers.

1.1 Security

We protect our partners and clients’ data as if they were our own. Our company’s culture lies on principles such as security, data protection and confidentiality of information. We permanently seek to

take the proper technical and organisational measures allowing us to preserve the security of personal data, such as encrypting sensitive information.

1.2 Fair competition

Compliance with competition rules is a core element of our activity. Groupama carries out their business in accordance with fair competition criteria and shall not find itself in any of the following situations: anti-trust agreements, prohibited pacts, others deeds of unfair competition and shall not abuse of a potential dominant position (if applicable). We expect our suppliers to adopt the same attitude. We actively apply in any decision we make the principles integrated in our fundamental values such as: ethics and integrity, impartiality and non-discrimination, professionalism and transparency, information confidentiality, prevention and fight against corruption and acts of terrorism, social responsibility, fair competition, avoiding conflicts of interests. Our business partners can rely on the fact that we walk the talk and keep our promises.

Groupama Asigurari observes the fair competition rules and deems as unlawful and immoral the disclosure of information concerning the information communicated by these throughout the offering process. We actively avoid the situations that might suggest or create an appearance of unfairness and seek to always ensure a transparent framework for communication.

1.3 Ethics and moral integrity

Principle under which our employees are prevented from requesting, accepting or offering, directly or indirectly, for the company, for themselves or others, any advantage or benefit (other than those strictly commercial, contractual) in consideration of the position they hold or to abuse in any manner of that position;

1.4 Impartiality and non-discrimination

Principle under which our suppliers are bound to have an objective attitude, neutral towards all economic operators, but also towards their own employees, without making any differentiation relying on political, religious or other criteria;

1.5 Professionalism and transparency

Principle under which our suppliers' employees are bound to fulfil their work duties with liability, competence, accuracy and transparency;

1.6 Conflict of interests

One of the guiding principles of Groupama Asigurari policy on the conflicts of interests is that all employees must seek to prevent / avoid the cases when their personal interest might conflict or could lead to conflicts with the Company's interests or the situations where the presumption of a conflict of interests might arise.

Purchases of goods and services must be carried out in all fairness and transparency to ensure the best quality and the best price in a competitive process. If an employee identifies a potential conflict of interests during the acquisition process and after the agreement is concluded, to avoid this risk and before taking any step that might lead to the appearance of a conflict of interests, the Employee shall have to inform in written form their direct superior. Any conflict of interests identified by the suppliers and/or sub-contractors in their relationship with Groupama Asigurari must be reported by them.

1.7 Prevention and fight against corruption deeds and acts of terrorism

Principle contemplating any of the following situations: money laundering, bribing and financing of terrorism, by reporting any transactions that might have any connection with these and by avoiding any of these transactions, in accordance with the legal provisions;

1.8 Social responsibility

Groupama Asigurari is actively involved in solving various social issues, by helping to promote and carry out humanitarian initiatives. We want and encourage our suppliers to adhere to this value.

1.9 Avoiding disparagement

The Groupama employees shall fulfil their duties in good faith, in accordance with the honest practices, while observing the interests of the parties involved and the fair competition imperatives, in the actual context of the market, by avoiding any breach brought to the reputation of our suppliers, company and colleagues;

1.10 Advertising and communication

Groupama Asigurari has high advertising and communication standards, therefore we use our best endeavours to protect our business partners' brand and reputation, as well as those of our company.

The suppliers shall not issue press communicates or make any other public announcements regarding the business relations they have with Groupama Asigurari without their prior consent, save for the case when the public announcement is required by law. In this last case, the Supplier shall previously notify Groupama Asigurari, to give us the possibility:

- a) to assess whether the Supplier is actually required by law to make a public announcement or if such challenges the standpoint of Groupama Asigurari, the objection must be taken into consideration by the Supplier;
- b) to request the amendment of the announcement as per the objective information known to both parties

1.11 Confidentiality and intellectual property

Principle enshrining the employees' duty not to disclose confidential information on the facts, data and information regarding the activity carried out, as well as any other deeds, facts or information concerning the person, property, activity, business, personal or business relations of clients to persons who are not authorized to receive such information.

The respect we have for the confidentiality of our clients and partners' information extends to all the areas where we act.

It is necessary that our suppliers protect and use accordingly the confidential information and brands protected by intellectual property rights, ensuring thus that the confidential data and intellectual property rights of Groupama, of our employees and business partners are protected.

1.12 Check of client history

Before engaging into business relations, Groupama carries out a Scanning of suppliers from a financial and reputational standpoint. If, for instance, before entering into a collaboration relationship with an important Supplier or shareholder / director / manager thereof having being subject to a

conviction for criminal offence, the Supplier may find itself prevented to enter into such a business relationship.

1.13 **Work**

Groupama ensures their employees safe work places that observe the laws and regulations in force. In our work relationships, it is necessary to respect each person's individuality and uniqueness, not to get involved in hostile, intimidation or harassment activities. Our policies strictly forbid any type of harassment behaviour or any other disciplinary breach.

Thus, it is necessary that the Groupama suppliers undertake to promote their employees' rights and to treat them with respect and dignity, in full accordance with the international conventions and/or treaties on the fundamental human rights.

Forced and heavy labour: It is strictly forbidden to use forced work under punishment threat, by restricting identity papers, or through any other type of constraint whatsoever. The supplier undertakes not to use forced work or to force the employees to work against their will.

Child labour: the Supplier guarantees that none of the Products or Services delivered by the latter to Groupama Asigurari was not manufactured or delivered by using children as work force, as such is defined in the IWO Convention no. 182/1999 on banning the most severe forms of child labour and the immediate action to eradicate such.

Discrimination: The supplier guarantees that it treats all employees equally and in all fairness. The suppliers shall not practice any kind of discrimination regarding the hiring, access to training, promotion or lay off based on any of the following criteria: gender, race, religion, age, disability, sexual orientation, political opinion, nationality or social or ethnical origin.

Salaries and benefits: The suppliers of Groupama Asigurari undertake to observe the following minimal criteria concerning their employees: to pay regular salaries, by paying overtime hours at

the legal rate set forth by the law of the country where they carry out their business and will provide their employees with all the benefits set forth by the law.

Work schedule: with respect to the work schedule and overtime performed, it is necessary that our Suppliers should comply with the limits set by the laws of the country where they carry out their activity.

Freedom to associate: The suppliers of Groupama Asigurari undertake to observe and acknowledge each employee's right to negotiate collectively, to establish a union or to join a syndical union of their choice, with no constraints or harassment and without imposing any restriction, penalty or discrimination.

1.14 **Environment and health**

To improve our business activities operations within the sustainable development area, Groupama protects the environment and is permanently seeking new methods to improve the sustainable development of our business operations.

Health and safety at the workplace

According to the specific risks of their activity area, Groupama recommends to their Suppliers to ensure safe workplaces in accordance with the regulations on work protection, to avoid accidents or bodily injuries that may result during work or while handling the work device. It is highly recommendable that these should install systems meant to detect, avoid or neutralize any threat to the health and safety of their employees in order to comply with the local and international rules and regulations in force.

Environment

The suppliers must have in mind their liability to protect the environment and duty to observe the national legislation on the protection and preservation of the environment. The negative effects on the community, the environment and natural resources must be minimalized and the population's health and safety must be protected.

In this respect, the suppliers shall observe the laws and regulations in order to:

- a) identify, monitor and use, carry, store, recycle, reuse and discharge of hazardous substances in safety conditions;
- b) the labelling of such hazardous substances;
- c) monitor, control and discharge of sewage water and solid waste obtained from operations, industrial processes or food safety units.

2. ENFORCEMENT

The code of ethics and professional conduct provides guidelines on the ethical issues that our company abides by. The values and principles described in this code apply both to Groupama Asigurari S.A. and to our business partners ("the Suppliers") and the sub-contracting parties thereof. By entering into an agreement with Groupama Asigurari, the Suppliers accept to also observe this code of conduct. The Groupama Asigurari suppliers also commit to take all necessary measures so that their sub-contracting parties should observe the duties set forth in this Code of Conduct. A clause inserted in the agreements with the Suppliers shall mention that the Code of Conduct shall be applicable in the relationship with the latter.

3. FINAL PROVISIONS

Failure to observe the provisions of this Code of Conduct by the Suppliers / the Suppliers' employees / their sub-contracting parties shall lead to immediate termination of the business relationship with Groupama Asigurari. This Code of conduct shall not modify existing contractual relationships.

This Code of conduct shall be observed by the supplier during the entire validity period of the agreement between the Parties.

GROUPAMA ASIGURARI SA