



Generali Group
Code of conducts
Generali Grupa
Kodeks ponašanja

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Poruka generalnog direktora Grupe

Drage kolege,

Naša Grupa ponosno zauzima vodeću poziciju na globalnom tržištu osiguranja zahvaljujući našim osnovnim vrednostima koje podrazumevaju kvalitet, transparentnost i poštenje, koji su oduvek predstavljali pokretače naših poslovnih aktivnosti.

Radeći zajednički, kao tim, mi doprinosimo unapređenju kvaliteta života naših klijenata i njihovom osećaju sigurnosti. Verujemo u pristup koji je orijentisan na čoveka i na izgrađivanje veza obostranog poverenja zasnovanog na kvalitetu naših usluga.

Naše poštovanje najviših međunarodnih standarda izvrsnosti obezbeđuju kompaniji Generali ugled i priznanje širom sveta. Moramo biti ponosni što smo deo ove Grupe i svesni toga koliko je naš pojedinačni doprinos od suštinske važnosti za uspeh.

Imidž kompanije Generali zavisi od našeg rada i na svima nama je odgovornost da održimo njenu dobru reputaciju. Moramo obezbediti potpuno uključivanje osnovnih vrednosti Grupe u naše svakodnevne poslovne aktivnosti i u odnosima sa drugim kolegama, klijentima, deoničarima, dobavljačima i svim akterima.

Kodeks ponašanja predstavlja našu vodilju ka ovom cilju.

Podstičem vas da pažljivo pročitate i temeljno razmotrite njegove odredbe, podsećajući ih se često. Neka Kodeks ponašanja bude uvek sa vama i konsultujte ga svaki put kada vam je potrebna naznaka kako treba da se ophodite.

Uveren sam da će, uz pomoć vrednog rada svakog od vas, Generali nastaviti da postiže sjajni učinak uz krajnju pravičnost. Kao i svako od vas, i ja sam posvećen ostvarivanju ovoga i zahvaljujem svima vama na neprekidnom doprinosu.

*Srdačno vaš
Mario Greco*

A message from the Group CEO

Dear Colleagues,

Our Group proudly holds a leading position in the global insurance market thanks to our fundamental values which include quality, transparency and fairness, that have always driven our business activities.

By working together as a team, we are contributing to improving the quality of our customers' lives and their sense of security. We believe in a people-centered approach and building relationships of mutual trust based on the quality of our services.

Our alignment to the highest international standards of excellence ensures Generali's reputation and recognition throughout the world. We must be proud to be part of this Group and aware of how our individual contribution is essential to its success.

Generali's image depends on our work and it is up to all of us to uphold its solid reputation. We must ensure that the fundamental values of the Group are fully embedded in our daily business activities and in the relationships with our colleagues, customers, shareholders, suppliers and all stakeholders.

The Code of Conduct represents our guide towards this aim.

I encourage you to read carefully and to observe its provisions thoroughly, referring to them often. Keep the Code of Conduct with you and consult it every time you need indications on how to behave.

I am confident that, through the hard work of each of you, Generali will continue to achieve great performances with utmost fairness. As each of you, I am committed to make this happen and I thank you all to for your continued contribution.

*Yours Sincerely,
Mario Greco*

<p>Opšte odredbe</p> <p>Primenljivost</p> <p>Ovaj Kodeks ponašanja („Kodeks“) definiše osnovna pravila za zaposlene i druga radno angažovana lica, uključujući članove nadzornih i upravnih organa (zajedničkim imenom „zaposleni“) Generali Grupe.</p> <p>Od trećih lica (konsultanata, dobavljača, agenata, itd.) koji nastupaju u ime Grupe se očekuje da se pridržavaju principa koji su navedeni u Kodeksu.</p> <p>Pravila Grupe</p> <p>Kodeks je dopunjen setom Pravila Grupe. Kako ova Pravila utvrđuju minimalne standarde ponašanja, društva-članice Grupe mogu usvojiti dodatne mere.</p> <p>Obaveza usaglašenosti</p> <p>Svi zaposleni su obavezni da znaju i poštuju ovaj Kodeks i Pravila Grupe, kao i druge interne propise relevantne za njihove konkretne zadatke i aktivnosti. Zaposleni moraju pohađati uvodne i godišnje programe obnavljanja obuka.</p> <p>Prijavljivanje problema i neprikladnog ponašanja</p> <p>Grupa podstiče zaposlene da prijave probleme u praksi ili aktivnosti koje smatraju faktičkim ili potencijalnim kršenjem zakona, Kodeksa, Pravila Grupe ili drugih internih propisa. Prijavljivanje se može učiniti lično ili anonimno, u pismenoj formi ili usmeno, i tretira se kao strogo poverljivo u skladu s zakonom i odredbama relevantnih Pravila Grupe. Osvete prema zaposlenima koji prijave probleme u dobroj nameri se ne tolerišu.</p> <p>ZAPAMTITE: <i>Pravila ponašanja utvrđena Kodeksom utiču na naš svakodnevni rad. Za svaku novu aktivnost koju preduzmemo treba da zapitamo sebe ne samo da li je to zakonito i dozvoljeno primenljivim propisima, već i da li je u duhu Kodeksa i Pravila Grupe.</i></p> <p><i>Kršenje Kodeksa stvara rizik za poslovanje i reputaciju Grupe. Zato, ne oklevajte, da istupite i prijavite neprikladno ponašanje kome ste prisustvovali.</i></p> <p>Pogledajte „Prijavljivanje problema i neprikladnog ponašanja“ u Pravilima Grupe</p>	<p>Common provisions</p> <p>Applicability</p> <p>This Code of Conduct (the "Code") defines the fundamental rules for employees and other working persons, including members of supervisory and management bodies (collectively, the "Employees") of the Generali Group.</p> <p>Third parties (consultants, suppliers, agents, etc.) who act on behalf of the Group are expected to adhere to the principles set out in the Code.</p> <p>Group Rules</p> <p>The Code is complemented by a set of Group Rules. While these Rules set minimum standards of behaviour, Group companies can adopt additional measures.</p> <p>Duty to comply</p> <p>All Employees are responsible for knowing and observing this Code and the Group Rules and other internal regulations relevant to their particular tasks and activities. Employees must attend introductory and yearly refresher training programs.</p> <p>Reporting concerns and incorrect conducts</p> <p>The Group encourages Employees to report concerns on practices or actions they consider to be factually or potentially in breach of law, the Code, the Group Rules or other internal regulations. Reports can be made personally or anonymously, in writing or orally, and are treated with strict confidentiality according to the law and the provisions of the relevant Group Rules. Retaliations against Employees who report concerns in good faith are not tolerated.</p> <p>REMEMBER: <i>The behaviour rules set out by the Code affect our daily work. For any new activity we undertake, we should ask ourselves not only if it is legal and allowed by applicable regulations, but also whether it aligns with the spirit of the Code and the Group Rules.</i></p> <p><i>Breaches of the Code endanger the business and reputation of the Group. So, do not hesitate to speak up and report misconducts that you have witnessed.</i></p> <p>Refer to „Reporting concerns and incorrect conducts“ Group Rules</p>
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<p>Kršenja</p> <p>Kršenja Kodeksa ili Pravila Grupe od strane zaposlenih mogu dovesti do disciplinskih mera u skladu sa lokalnim primenljivim propisima.</p> <p>Kršenja takođe mogu dovesti do dosuđivanja odštete ili krivičnog gonjenja.</p> <p>Pravila ponašanja</p> <p>Fer poslovanje</p> <p><i>Grupa posluje u skladu sa zakonom, internim propisima i profesionalnom etikom.</i></p> <p>Zaposleni se moraju ponašati pošteno i iskreno, moraju poštovati važeće propise, interne propise, odredbe ovog Kodeksa i Pravila Grupe, kao i obaveze održivosti Grupe. Od menadžera se očekuje da se ponašaju kao uzori i da promovišu kulturu etike i poštovanja.</p> <p>Pogledajte: „Politika poštovanja Grupe“</p> <p>Korporativna društvena odgovornost</p> <p><i>Grupa ima za cilj da doprinese kvalitetnom privrednom i društvenom razvoju, koji je zasnovan na poštovanju osnovnih ljudskih i radnih prava, kao i zaštiti životne sredine. Grupa promoviše kulturu održivosti kroz svoje sfere uticaja, posebno među svojim zaposlenima, klijentima i dobavljačima.</i></p> <p>Zaposleni su, dakle, posvećeni:</p> <ul style="list-style-type: none"> • Pomaganju kolegama da pruže što više, promovisanju i priznavanju individualnih doprinosa koji su uloženi u okviru uspeha organizacije; • Unapređivanju okolnosti zajednica u kojima Grupa posluje, igrajući ulogu korporativnog građanina u podršci institucijama, organizacijama i udruženjima; • Stavljajući veština i resursa Grupa na uslugu onima koji su najranjiviji, kako bi promovisali integraciju najsiromašnijih i najugroženijih ljudi; • Uzimajući, takođe u obzir ekološko, društveno i korporativno upravljanje, ponašanje emitenta tamo gde ulaže, prilikom upravljanja investicijama Grupe; • Doprinošenje zaštiti okoline, promovisanje smanjenja direktnog i indirektnog uticaja njihovih 	<p>Breaches</p> <p>Breaches of the Code or of the Group Rules by employees may result in disciplinary actions according to local applicable regulations.</p> <p>Breaches may also result in the award of damages or criminal prosecutions.</p> <p>Rules of conduct</p> <p>Fair conduct of business</p> <p><i>The Group conducts business in compliance with law, internal regulations and professional ethics.</i></p> <p>Employees must behave fairly and honestly, observing applicable law, internal regulations, the provisions of this Code and of the Group Rules and the Group's sustainability commitments. Managers are expected to act as a role model and promote a culture of ethics and compliance.</p> <p>Refer to the: „Group Compliance Policy“</p> <p>Corporate social responsibility</p> <p><i>The Group aims at contributing to quality economic and social development based on respect for fundamental human and labour rights and protection of the environment. The Group promotes a culture of sustainability throughout its spheres of influence, specifically among its Employees, customers and suppliers.</i></p> <p>Employees are therefore committed to:</p> <ul style="list-style-type: none"> • making the most of their colleagues, promoting development and recognizing individual contributions made to the success of the organization; • improving the circumstances of the communities where the Group operates, playing a role as a corporate citizen in support of institutions, organizations and associations; • putting the skills and resources of the Group at the service of those who are most vulnerable, in order to promote the integration of the poorest and most disadvantaged people; • considering also the environmental, social and corporate governance conduct of the issuers in which it invests, when managing the Group's investments; • contributing to protection of the environment, promoting a reduction in the direct and
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<p>delatnosti na životnu sredinu.</p> <p>Svake godine, u svojoj Tabeli posvećenosti održivosti, Grupa objavljuje inicijative koje su planirane u predmetnom periodu. Zaposleni moraju postupati u skladu sa obavezama Grupe, a u cilju postizanja ovih inicijativa.</p> <p>Pogledajte: “Politiku zaštite životne sredine Generali Grupe” i dodatnu dokumentaciju dostupnu u odeljku „održivost“ korporativnog web sajta Grupe (www.generalicom.com)</p> <p>Radno okruženje, raznolikost i inkluzija</p> <p><i>Grupa obezbeđuje stimulatívno radno okruženje, bez bilo kakvih diskriminacija ili zlostavljanja. Raznolikost i inkluzija zaposlenih se promovíšu, u uverenju da saradnja između ljudi iz različitih kultura, veština, perspektiva i iskustava predstavlja osnov za privlačenje talenata i za omogućavanje poslovnog rasta i inovativnosti.</i></p> <p>Zaposleni se jedni prema drugima ponašaju sa poštovanjem, izbegavajući ponašanja koja mogu povrediti dostojanstvo nekog drugog.</p> <p>Menadžeri moraju kreirati okruženje u kome se promoviše dobrodošlica i podrška, gde se integritet, poštovanje, saradnja, različitost i inkluzija efikasno primenjuju.</p> <p>Pogledajte: “Promovisanje različitosti i inkluzije” Pravila Grupe</p> <p>Odluke koje se tiču zaposlenih, uključujući regrutovanje, zapošljavanje, obuku, evaluaciju i napredovanje se zasnivaju isključivo na pojedinačnom učinku i zaslugama i na njih ne mogu uticati, na primer, rasa, etnička pripadnost, religija/uverenja, seksualna orijentacija, bračno stanje ili politički stav.</p> <p>Komunikacija prema zaposlenima treba da bude otvorena i poštena. Grupa ohrabruje razvoj individualnih sposobnosti i veština uz obezbeđivanje adekvatne stručne obuke kao dela šireg okvira razvoja zaposlenih.</p> <p>Grupa priznaje slobodu udruživanja i kolektivno dogovaranje za svoje zaposlene.</p> <p>Čvrsto je protiv bilo kog oblika neregularnog rada ili eksploatacije kao i bilo koje vrste prinudnog ili prisilnog rada i dečijeg rada.</p>	<p>indirect environmental impact of their activities.</p> <p>Each year, in its Sustainability Commitments Chart, the Group declares the initiatives planned for the period in question. Employees must act in accordance with the Group's commitments and in order to achieve these initiatives.</p> <p>Refer to: “Environmental Policy of the Generali Group” and to the further documentation available to the section “sustainability” of the Group’s corporate website (www.generalicom.com)</p> <p>Work environment, diversity and inclusion</p> <p><i>The Group ensures a stimulating work environment, free of any kind of discrimination or harassment. Diversity and inclusion in the workforce are promoted, in the belief that cooperation between people with different cultures, skills, perspectives and experiences is fundamental in attracting talent and to enable business growth and innovation.</i></p> <p>Employees shall treat one another with respect, avoiding conducts that may hurt someone else’s dignity.</p> <p>Managers must create and promote a welcoming and supportive environment, where integrity, respect, cooperation, diversity and inclusion are effectively Pursued.</p> <p>Refer to the „Promoting diversity and inclusion” Group Rules</p> <p>Decisions concerning Employees, including recruiting, hiring, training, evaluation and advancement, are based exclusively on individual merit and performance and cannot be influenced, for example, by race, ethnicity, religion/belief, sexual orientation, marital status or political view.</p> <p>Communications towards Employees need to be open and fair. The Group encourages the development of individual capabilities and skills by providing adequate professional training as part of a broader staff development framework.</p> <p>The Group recognises freedom of association and collective bargaining for its employees.</p> <p>It strongly rejects any form of irregular work or exploitation as well as any kind of forced or compulsory labour and child labour.</p> <p>The Group stands against any kind of harassment,</p>
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<p>Grupa stoji nasuprot bilo koje vrste zlostavljanja, maltretiranja i uznemiravanja.</p> <p>ZAPAMTITE: Znaci i saveti upozorenje protiv zlostavljanja:</p> <p><i>Čvrsto se protivimo bilo kakvom ponašanju koje predstavlja nepoštovanje, imajući na umu da se zlostavljanje određuje po tome kako drugi doživljavaju naša dela, bez obzira na naše prvobitne namere.</i></p> <p><i>Na primer, seksualno orijentisani imejlovi ili tekstualne poruke, neprijatna gestikulacija ili fizički kontakt, kao i uvredljivi i degradirajući komentari o ličnim karakteristikama su zabranjeni i moraju se smatrati oblicima uznemiravanja, bez obzira na to da li su imali nameru da posluže kao zabavna opaska ili šala.</i></p> <p><i>Ako smatrate da ste žrtva bilo kakve vrste uznemiravanja, zlostavljanja ili maltretiranja:</i></p> <ul style="list-style-type: none"> • <i>Zapišite šta se dogodilo (datum, vreme, mesto, situaciju, svedoke) i sačuvajte dokaz bilo kakvog neprikladnog ponašanja (npr. materijali, pismena konverzacija, itd);</i> • <i>Objasnite onome ko vas uznemirava da takvo ponašanje nije prihvatljivo i da mora prestati, ističući da se Grupa snažno protivi bilo kom obliku zlostavljanja i da se takvo ponašanje strogo kažnjava;</i> • <i>Ako onaj ko vas uznemirava ne prestane, ne ustručavajte se da prijavite situaciju, jer to predstavlja kršenje ovog Kodeksa.</i> <p><i>Ne zaboravite da uvek možete tražiti podršku od svog menadžera, ili vaše HR ili Compliance funkcije.</i></p> <p>Radni prostor</p> <p><i>Grupa obezbeđuje zdrav, bezbedan i siguran radni prostor.</i></p> <p><i>Grupa garantuje svojim zaposlenima fer radne uslove, obezbeđujući sigurnu i zdravu sredinu.</i></p> <p><i>Od zaposlenih se traži da izbegavaju ponašanja koja mogu ugroziti bilo čije zdravlje ili bezbednost.</i></p> <p><i>Zaposleni podržavaju napore Grupe da zaštiti životnu sredinu i da minimalizuje uticaj svojih poslovnih aktivnosti na životnu sredinu.</i></p> <p>Zaštita imovine i poslovnih podataka</p> <p><i>Materijalna i nematerijalna sredstva Grupe se moraju čuvati.</i></p>	<p>bullying and mobbing.</p> <p>REMEMBER: Anti-harassment: warning signs and tips:</p> <p><i>We have to strongly reject any disrespectful behaviour, keeping in mind that harassment is determined by how others perceive our actions, regardless of our original intentions.</i></p> <p><i>Thus, for example, sexually oriented e-mails or text messages, unwelcome gestures or physical contact, as well as offensive or degrading comments about personal characteristics are prohibited and must be considered as forms of harassment, regardless of whether they were intended as playful remarks or jokes.</i></p> <p><i>If you feel that you are a victim of any sort of harassment, bullying or mobbing:</i></p> <ul style="list-style-type: none"> • <i>write down what happened (date, time, place, situation, witnesses) and keep evidence of any inappropriate conduct (e.g. materials, written conversations, etc);</i> • <i>make it clear to the harasser that such conduct is unacceptable and must stop, pointing out that the Group firmly stands against any form of harassment and this misconduct is severely sanctioned;</i> • <i>if the the harasser does not stop his/her misconduct, do not hesitate to report the situation, since it is a violation of this Code.</i> <p><i>Remember that you can always ask your manager, your Human Resources or Compliance Function for support.</i></p> <p>Workspace</p> <p><i>The Group ensures a healthy, safe and secure workspace.</i></p> <p><i>The Group guarantees to its Employees fair working conditions, ensuring a safe and healthy environment.</i></p> <p><i>Employees are requested to avoid conducts that may endanger anyone's health or safety.</i></p> <p><i>Employees support the Group's endeavours to protect the environment and to minimize the environmental impact of their working activities.</i></p> <p>Assets and business data protection</p> <p><i>Group tangible and intangible assets must be preserved.</i></p>
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<p>Materijalna sredstva Grupe, uključujući nekretnine, opremu i zalihe, moraju se zaštititi od oštećenja i zloupotrebe i moraju se koristiti samo u poslovne svrhe, osim uz odgovarajuću dozvolu.</p> <p>Informacije u vezi sa poslovanjem, uključujući sve one koje su stečene tokom vršenja zadataka u ime Grupe, se tretiraju kao poverljive. Zaposleni moraju rukovati njima strogo poverljivo i otkrivati ih samo ukoliko je to neophodno ili ako imaju konkretnu dozvolu. Ista pravila se primenjuju na svu dokumentaciju koja sadrži takve poverljive informacije.</p> <p>Intelektualna svojina Grupe (tj. ideje, proizvodi, metode, strategije, itd.) se mora zaštititi, ukoliko je potrebno i pomoću patenata, zaštitnog znaka i autorskih prava.</p> <p>Obaveza čuvanja intelektualne svojine Grupe se nastavlja i nakon što se završi radni odnos u Grupi.</p> <p>Svi poslovni podaci se moraju beležiti tačno i potpuno. Evidencije i dokumentacija moraju biti na raspolaganju i dostupne na zahtev organa ili ovlašćenih zaposlenih.</p> <p>Evidencije i podaci, uključujući elektronske datoteke i imejlove, se moraju čuvati sve dok je to potrebno po primenljivim zakonima; u slučaju parnice koja se očekuje ili predviđa ili inspekcije organa, moraju se čuvati koliko god je neophodno.</p> <p>Falsifikovanje ili netačno menjanje bilo kojih evidencija ili dokumenata je strogo zabranjeno.</p> <p>ZAPAMTITE: <i>Otkrivanje informacija samo ako je neophodno znači da se pristup takvim informacijama mora odobriti samo u konkretne i legitimne svrhe. Stoga, kada god se od nas traži da otkrijemo poverljive informacije, moramo pažljivo da potvrdimo svrhu zahteva, čak i ako dolazi iz drugog odeljenja istog društva.</i></p> <p><i>Poslovne informacije se moraju čuvati tokom celog njihovog veka trajanja. Moramo da obratimo pažnju na uništavanje dokumentacije koja sadrži poverljive informacije, pošto se primenjuju ista pravila za pravilno rukovanje.</i></p> <p>Lične informacije i privatnost</p> <p><i>Ličnim informacijama se mora pravilno rukovati i pravo na privatnost se mora poštovati.</i></p> <p>Ličnim informacijama koje se tiču trećih strana, bilo</p>	<p>The Group tangible assets, including real estate, equipment and supplies, must be protected from damage and misuse and must be used for working purposes only, unless properly authorized.</p> <p>Business-related information, including any acquired in the performance of assignments on behalf of the Group, shall be treated as confidential. Employees must handle it with strict confidentiality and disclose it only on a need-to-know basis or if specifically authorized. The same rules apply to all documents containing such confidential information.</p> <p>Group intellectual property (i.e. ideas, products, methodologies, strategies, etc.) must be protected, if appropriate, also through patents, trademarks and copyrights.</p> <p>The obligation to preserve the Group's intellectual property continues even after the employment with the Group ends.</p> <p>All business data must be recorded accurately and completely. Records and documents must be available and accessible at the request of authorities or authorized staff.</p> <p>Records and data, including electronic files and e-mails, must be retained as long as required by the applicable laws; in the event of pending or foreseeable litigation or authority inspections they must be retained for any longer time necessary.</p> <p>Fraudulently altering or falsifying any record or document is strictly forbidden.</p> <p>REMEMBER: <i>Disclosing information on a need-to-know basis means that access to such information must be allowed only for specified and legitimate purposes. Thus, whenever asked to disclose confidential information, we have to carefully verify the purpose of the request, even if coming from another department of the same company.</i></p> <p><i>Business related information must be safeguarded through its entire life-cycle. We have to pay attention to dispose of documents containing confidential information, since the same rules for proper handling apply.</i></p> <p>Personal information and privacy</p> <p><i>Personal information must be properly handled and privacy rights must be respected.</i></p> <p>Personal information concerning third parties, whether customers, employees, suppliers or other,</p>
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<p>da su to klijenti, zaposleni, dobavljači ili drugi, mora se rukovati u skladu sa pravilom „otkriti ako je neophodno“, a u skladu sa lokalnim zakonima.</p> <p>Lični podaci se moraju prikupljati, obrađivati i deliti samo u posebne, opravdane, zakonite i tražene svrhe i to u meri u kojoj je to striktno potrebno.</p> <p>Opcije privatnosti i opredeljenja utvrđena od strane vlasnika bilo koje lične informacije, se moraju poštovati.</p> <p>Posebna pažnja je posvećena prenosu podataka preko državnih granica, uključujući i prenos između društava unutar Grupe. Generalno, pre prenošenja informacija, od zaposlenih se traži da potvrde koja ograničenja, ako ih ima, su predviđena zakonom, konsultujući se sa Compliance funkcijom kada god postoji nedoumica.</p> <p>ZAPAMTITE: <i>Lična informacija je informacija koja se odnosi na pojedinca koji se može identifikovati, npr. zdravstvena i porodična pitanja, broj pasoša i lične karte, bankarske informacije, itd.</i></p> <p>Sukob interesa</p> <p><i>Zaposleni se mora ponašati u skladu sa interesima Grupe.</i></p> <p>Sukob interesa se javlja kada je zaposleni uključen u lične aktivnosti i veze koje mogu uticati na njegovu/njenu sposobnost da nastupa u najboljem interesu Grupe. Generalno, sukobe interesa treba izbegavati, a ako se sukob ne može izbeći, njime se mora upravljati tako da se izbegnu štete po Grupu.</p> <p>Od zaposlenih se očekuje da budu svesni potencijalnih sukoba koji mogu nastati u svakodnevnim poslovnim aktivnostima i moraju ih prijaviti svom menadžeru ili Compliance funkciji. Ako imaju bilo kakve nedoumice u vezi sa postojanjem sukoba interesa, treba da potraže razjašnjenje od svojih menadžera ili Compliance funkcije.</p> <p>Pogledajte: “Sukob interesa” Pravila Grupe</p> <p>ZAPAMTITE: <i>Sukobi interesa nastaju kada mi, članovi naše porodice ili druge bliske osobe, mogu da steknu ličnu dobit kao posledicu našeg položaja u Grupi ili pristupom poverljivim informacijama, kao i kada je neko od naših rođaka zaposlen zbog našeg uticaja ili našeg položaja u kompaniji.</i></p> <p><i>Pored toga, sukobi interesa mogu da zavise od vršenja aktivnosti van Grupe, na primer, uloga zaposlenog, direktora ili konsultanta u kompanijama, fondacijama</i></p>	<p>must be handled on a need-to-know basis and in accordance with local law.</p> <p>Personal data must be collected, processed and shared only for specified, legitimate and required purposes and to the extent they are strictly necessary.</p> <p>Privacy options and preferences stated by the owner of any personal information must be respected.</p> <p>Particular care is needed in transferring data across national borders, including between Group companies. In general, before transmitting information, Employees are required to verify which restrictions, if any, are provided for by law, consulting with Compliance Function whenever in doubt.</p> <p>REMEMBER: <i>Personal information is information relating to an identified or identifiable individual, e.g. health and family matters, passport or identity card number, banking information etc.</i></p> <p>Conflicts of interest</p> <p><i>Employees must act pursuing the Group's interests.</i></p> <p>A conflict of interest occurs when an Employee is involved in personal activities or relationships that might interfere with his/her ability to act in the best interest of the Group. In general, conflicts of interests should be avoided and, if a conflict is unavoidable, it must be managed in order to avoid detriments to the Group.</p> <p>Employees are expected to be aware of potential conflicts that can arise in daily business activities and must report these to their manager or the Compliance Function. If they have any doubt in relation to the existence of a conflict of interest, they shall seek clarifications from their managers or the Compliance Function.</p> <p>Refer to: “Conflict of interest” Group Rules</p> <p>REMEMBER: <i>Conflicts of interest arise when we, our family members or other close persons, could receive personal gains as a result of our position in the Group or through access to confidential information, as well as when one of our relatives is hired due to our influence or our position in the company.</i></p> <p><i>Furthermore, conflicts of interest could depend on doing activities outside of the Group, for example serving as an employee, director or consultant of</i></p>
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<p><i>ili neprofitnim organizacijama, kada se takve aktivnosti nagrađuju od strane lica koja su ili se očekuje da stupe u vezu sa Grupom.</i></p> <p>Protiv mita i protiv korupcije</p> <p><i>Grupa osuđuje i bori se protiv svih oblika mita i korupcije.</i></p> <p>Zaposleni moraju poslovati na častan i etičan način.</p> <p>Bilo koja vrsta korupcije, uključujući mito i iznudu, se ne toleriše. Stoga se zaposleni moraju uzdržavati od nuđenja ili prihvatanja isplata, darova, reprezentacija ili drugih pogodnosti koje im ne pripadaju.</p> <p>Uvek je zabranjeno obećati, dati ili primiti poklone u obliku gotovine ili ekvivalentnim načinima plaćanja, ili bilo koju drugu vrstu hartija od vrednosti.</p> <p>Pokloni, reprezentacije ili druge pogodnosti se mogu ponuditi ili prihvatiti jedino u vezi sa poslovnom aktivnošću i ako se smatra sitnicom ili prikladnom situacijom (tj. kada su razumni i u skladu sa lokalnim zakonima) i ne treba uobičajeno da premašuju EUR 100.</p> <p>Priroda poslovanja Grupe zahteva interakciju sa javnim zvaničnicima, javnim institucijama ili autoritetima, predstavnicima političkih partija i sindikata. U takvim okolnostima, zaposleni se moraju uzdržavati od nuđenja ili primanja, direktno ili indirektno, bilo čega osim onog što je u vezi sa uobičajenim poslovnim aktivnostima i u skladu sa zakonom i uobičajenim lokalnim praksama. Bilo koje poklone i pozivnice za zabavne događaje koji se upute javnim zvaničnicima mora odobriti Compliance officer.</p> <p>Zaposleni moraju obavestiti svoje neposredne rukovodioce i Compliance funkciju o bilo kakvom pokušaju davanja ili primanja poklona, reprezentacija ili drugih pogodnosti koji nisu prikladni a koji bi mogli stvoriti izgled neprikladnog uticaja na poslovne odluke.</p> <p>ZAPAMTITE: <i>Pokloni su neprikladni ako stvaraju izgled loše namere ili neprikladnog uticaja na poslovne odluke.</i></p> <p><i>Ista pravila se primenjuju na poklone, reprezentaciju ili druge pogodnosti koje se daju članovima naše porodice.</i></p> <p>Pogledati Pravila Grupe “Protiv mita i protiv korupcije”</p> <p>Odnosi sa klijentima</p> <p><i>Zadovoljstvo klijenta je ključni faktor pogleda na</i></p>	<p><i>companies, foundations or non-profit organizations, when such activities are remunerated by entities that have or expect to enter in a relationship with the Group.</i></p> <p>Anti-bribery and anti-corruption</p> <p><i>The Group condemns and combats all forms of bribery and corruption.</i></p> <p>Employees must conduct business in an honest and ethical way.</p> <p>Any form of corruption, including bribery and extortion, is not tolerated. Thus, Employees must abstain from offering or accepting undue payments, gifts, entertainment or other benefits.</p> <p>It is always forbidden to promise, give or receive gifts in the form of cash or equivalent payment methods, or any other kind of negotiable securities.</p> <p>Gifts, entertainment or other benefits may only be offered or accepted in connection with business activity and if deemed commonplace and appropriate to the circumstance (i.e. when they are reasonable and comply with local laws) and should not normally exceed € 100.</p> <p>The nature of the Group business requires interaction with public officials, public institutions or authorities, representatives of political parties and trade unions. In such circumstances Employees must refrain from offering or receiving, directly or indirectly, anything unless in connection with ordinary business activities and in line with law and common local practices. Any gifts and invitations for entertainment events made to public officials require the approval of the Compliance Officer.</p> <p>Employees must inform their direct manager and the Compliance Function about any attempt to give or to receive undue gifts, entertainment or other benefits that could create the appearance of improper influence in business decisions.</p> <p>REMEMBER: <i>Gifts are inappropriate if they do create an appearance of bad faith or improper influence in business decisions.</i></p> <p><i>The same rules apply for gifts, entertainment or other benefits that are given to your family members.</i></p> <p>Refer to „Anti-bribery and Anti-corruption“ Group Rules</p> <p>Customer relations</p> <p><i>Customer satisfaction is a key factor of the Group's business strategic view, enabling the Group to</i></p>
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<p><i>poslovnu strategiju Grupe, omogućavajući Grupi da ojača i unapredi svoju lidersku poziciju.</i></p> <p>U odnosu sa klijentima, od zaposlenih se traži da se ponašaju ispravno i časno, pošteno i profesionalno, i da se uzdrže od obmanjivanja i zavaravanja.</p> <p>Zaposleni moraju uvek da imaju u vidu najbolji interes klijenta, pružajući rešenja koja odgovaraju njihovim potrebama. Treba da se izbegnu sukobi interesa a ukoliko su neizbežni, moraju da se usmere ka cilju zaštite interesa klijenata.</p> <p>Prilikom nuđenja proizvoda i usluga, zaposleni moraju davati samo one izjave koje odgovaraju činjenicama, koje su tačne i istinite u potpunosti.</p> <p>Pomoć nakon prodaje se mora pružiti i mora biti lako dostupna.</p> <p>Zadovoljstvo klijenta se mora konstantno pratiti. Novi proizvodi i usluge se moraju razvijati u skladu sa klijentovim rastućim potrebama i identifikovanim oblastima napredovanja.</p> <p>Proces razvoja proizvoda i usluga mora biti jasno definisan, a strateški plan novih proizvoda i usluga se mora periodično usvajati do strane svake kompanije unutar Grupe.</p> <p>ZAPAMTITE: <i>Prilikom predlaganja proizvoda i usluga našim klijentima, od nas se očekuje da nastupamo u njihovom najboljem interesu, stoga ih informišući o svim relevantnim aspektima proizvoda i usluga koje se nude.</i></p> <p><i>Pored toga, moramo obezbediti da klijenti budu pravilno obavestavani pre, tokom i nakon prodaje i da im se omogući slobodno podnošenje odštetnih zahteva i ulaganje reklamacija.</i></p> <p>Fer konkurencija i anti-monopol</p> <p><i>Grupa priznaje osnovnu ulogu slobodne konkurencije kod rastućih poslovnih prilika i učinka.</i></p> <p>Konkurencija se mora zasnivati na vrhunskim proizvodima i uslugama i na fer komercijalnim praksama.</p> <p>Zaposlenima je zabranjeno da diskredituju konkurente ili njihove proizvode ili usluge ili da manipulišu, taje ili prezentuju iskrivljeno stanovište realnosti u cilju dobijanja nedopuštene dobiti.</p> <p>Pored toga, zabranjene su prakse i ponašanja koja</p>	<p><i>strengthen and improve its leadership position.</i></p> <p>In relations with customers, Employees are required to behave correctly and honestly, forthrightly and professionally, and to refrain from deceptive or misleading practices.</p> <p>Employees must always consider the customers' best interests, providing solutions appropriate to their needs. Conflicts of interest shall be avoided or, if unavoidable, be managed in order to protect the interests of customers.</p> <p>In proposing products and services, Employees must only make statements that are factual, truthful and completely accurate.</p> <p>After-sale assistance must be granted and easily accessible.</p> <p>Customer satisfaction must be constantly monitored. New products and services must be developed in line with customers' evolving needs and identified areas of improvement.</p> <p>The products and services development process must be clearly defined, and a strategic plan of new products and services must be periodically adopted by each Group Company.</p> <p>REMEMBER: When proposing products and services to our customers, we are expected to act in their best interest, hence informing them of all relevant aspects of the product or service being offered.</p> <p>We must furthermore ensure that consumers are appropriately informed before, during and after sale, and that they are enabled to freely submit a claim or make a complaint.</p> <p>Fair competition and antitrust</p> <p><i>The Group recognizes the fundamental role of free competition in increasing business opportunities and performance.</i></p> <p>Competition must be based on superior products and services and on fair commercial practices.</p> <p>Employees are forbidden to discredit competitors or their products or services or to manipulate, conceal or present a distorted view of reality in order to obtain illicit gains.</p> <p>Furthermore, practices and conducts aimed at restricting free and fair competition are prohibited.</p>
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<p>imaju za cilj da ograniče slobodnu i fer konkurenciju.</p> <p>Zaposleni treba da budu svesni primenljivih zakona o zaštiti konkurencije i antimonopolskih propisa kada se bave konkurencijom, kako bi izbegli neprikladno ponašanje.</p> <p>U tom cilju, Pravna i Compliance funkcija će biti konsultovane radi pojašnjavanja lokalnih zakona i propisa.</p> <p>ZAPAMTITE: <i>Sledeće prakse se smatraju anti-konkurentskim:</i></p> <ul style="list-style-type: none"> • <i>svi sporazumi sa konkurencijom koji imaju za cilj fiksne cene ili premije ili ograničavanje vrste ili količine proizvoda ili usluga koje se nude;</i> • <i>svi sporazumi sa dobavljačima ili zastupnicima koji imaju za cilj ograničavanje fer konkurencije;</i> • <i>razmena informacija sa konkurencijom o budućim strategijama u vezi sa proizvodima ili cenama;</i> <p>Odabir dobavljača</p> <p><i>Grupa obezbeđuje poštenje, transparentnost i iskrenost u odnosima sa dobavljačima.</i></p> <p>U odnosu sa dobavljačima, od zaposlenih se traži da se ponašaju pošteno, transparentno i iskreno i da izbegavaju situacije sukoba interesa.</p> <p>Odabir dobavljača mora biti isključivo zasnovan na principima fer konkurencije i kvaliteta proizvoda i usluga koje se nude.</p> <p>Kvalitet proizvoda i usluga mora biti ocenjen prema međunarodnim etičkim kriterijumima u vezi sa radnim i ljudskim pravima, a u skladu sa uticajem metoda proizvodnje i isporuke na životnu sredinu.</p> <p>Pogledati “Etički kodeks za dobavljače” Generali grupe</p> <p>Finansijske informacije</p> <p><i>Kompletne i precizne finansijske informacije su osnovno sredstvo kojim se svim zainteresovanim licima omogućava donošenje informisanih odluka u njihovim odnosima sa Grupom.</i></p> <p>Finansijski izveštaji moraju biti tačni, fer, potpuni i u strogoj saglasnosti sa računovodstvenim standardima</p>	<p>Employees need to be mindful of applicable competition laws and anti-trust regulations when dealing with competitors in order to avoid improper conducts.</p> <p>To this end, the Legal and Compliance Functions shall be consulted for clarifications on local law and regulations.</p> <p>REMEMBER: <i>We must consider as anti-competitive practices the following:</i></p> <ul style="list-style-type: none"> • <i>all agreements with competitors aimed to fix prices or premiums or to restrict the kind or quantity of products or services being offered;</i> • <i>all agreements with suppliers or agents aimed to restrict free competition;</i> • <i>the exchange of information with competitors about future strategies related to products or prices.</i> <p>Supplier selection</p> <p><i>The Group ensures fairness, transparency and straightforwardness in the relationships with its suppliers.</i></p> <p>In the relations with suppliers, Employees are required to behave fairly, transparently and straightforwardly and to avoid situations of conflicts of interest.</p> <p>The selection of suppliers must be exclusively based on principles of fair competition and on the quality of the products and services offered.</p> <p>The quality of products and services must be assessed against international ethical criteria regarding labour and human rights and in consideration of the environmental impact of production and supply methods.</p> <p>Refer to: Ethical Code for suppliers of the general Group</p> <p>Financial information</p> <p><i>Complete and accurate financial information is a fundamental means of enabling stakeholders to make informed decisions in their relations with the Group.</i></p> <p>Financial reports must be truthful, fair, complete and in strict compliance with the Group and local</p>
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<p>na lokalnom nivou i na nivou Grupe.</p> <p>Zaposleni moraju rukovati finansijskim podacima pošteno i tačno, čuvajući detaljne i neizmenjene finansijske podatke u formatu koji se može povratiti tokom trajanja perioda koji je određen za čuvanje. Zabranjeni su falsifikati i netačna menjanja evidencija ili dokumentacije i nikada ne mogu biti opravdani.</p> <p>Od menadžera se očekuje da promovišu kulturu interne kontrole finansijskog izveštavanja.</p> <p>Finansijski izveštaji i druge informacije upućene akcionarima, regulatornim telima i javnosti moraju biti razumljivi i javno dostupni u skladu sa primenljivim lokalnim zakonom.</p> <p>ZAPAMTITE: <i>Poslovni ciljevi se moraju postizati na fer način i bez falsifikovanja i netačnih promena bilo koje vrste.</i> <i>Nemojte se ustručavati da prijavite ponašanje koje se pokazuje da je u sukobu sa ovom odredbom.</i></p> <p>Insajderski poslovi</p> <p><i>Grupa preduzima mere u cilju sprečavanja nepravilne upotrebe insajderskih informacija i obezbeđuje fer upravljanje poslovima koji uključuju hartije od vrednosti.</i></p> <p>Insajderske informacije su specifične informacije koje nisu u javnom domenu ali bi, ako se učine javnim, mogle značajno uticati na cenu hartija od vrednosti.</p> <p>Takve informacije, bez obzira na to da li se odnose na društvo unutar Grupe ili na drugo društvo van Grupe ili na njihove akcije na berzi, moraju se tretirati kao strogo poverljive i otkrivati samo ako je neophodno u skladu sa odredbama lokalnog zakona.</p> <p>U slučaju da poseduju insajderske informacije, zaposleni se moraju uzdržavati od njihovog otkrivanja, osim drugim kolegama koje imaju valjane poslovne razloge da ih prime. Insajderske informacije se takođe mogu otkrivati trećim stranama (advokatima, revizorima, konsultantima, itd.) koji treba da ih znaju u vezi sa odgovarajućim razlozima i koji su izvršili odgovarajuće ugovore o zaštiti poverljivosti.</p> <p>Zaposlenima koji poseduju insajderske informacije je zabranjeno da ih dele, direktno ili indirektno, ili da daju savete ili preporuke o hartijama od vrednosti Grupe ili drugim hartijama od vrednosti, ako se transakcije zasnivaju na takvim informacijama. Ista pravila se primenjuju bez obzira na to da li se bave</p>	<p>accounting standards.</p> <p>Employees must deal with financial data honestly and accurately, maintaining detailed and undistorted financial information in a recoverable format for the duration of the assigned retention period. Fraudulent alterations or falsifications of records or documents are forbidden and can never be justified.</p> <p>Managers are expected to promote a culture of internal control over financial reporting.</p> <p>Financial statements and other information addressed to shareholders, regulators and the public must be understandable and publicly available according to the applicable local law.</p> <p>REMEMBER: <i>Business goals and objectives must be reached fairly and without fraudulent alteration or falsification of any kind.</i> <i>Do not hesitate to report conducts which appear to conflict with this statement.</i></p> <p>Insider dealing</p> <p><i>The Group takes measures to prevent the improper use of inside information and ensures the fair management of deals involving securities.</i></p> <p>Inside information is specific information that is not in the public domain but, if made public, could significantly influence the price of securities.</p> <p>Such information, regardless of whether it is related to a company of the Group or to another company outside the Group or their listed securities, must be treated with strict confidentiality and disclosed on a need-to-know basis according to the provisions of local law.</p> <p>When in possession of inside information, Employees must refrain from disclosing it, except to their colleagues who have a valid business reason to receive it. Inside information may also be disclosed to third parties (lawyers, auditors, consultants, etc.) who have a need to know it in connection with a proper reason and have executed appropriate confidentiality agreements.</p> <p>Employees in possession of inside information are prohibited to deal, directly or indirectly, or to provide tips or make recommendations about Group securities or other securities, if transactions are based on such information. Same rules apply regardless of whether they deal in securities for personal purposes or in the behalf of the Group.</p>
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<p>hartijama od vrednosti u lične svrhe ili u korist Grupe.</p> <p>U svakom slučaju, zaposleni koji planiraju da posluju ili da preporuča nekome da posluju hartijama od vrednosti Grupe, moraju u potpunosti biti u skladu sa primenljivim zakonima i politikom na lokalnom nivou i nivou Grupe.</p> <p>ZAPAMTITE: <i>Insajderske informacije se mogu ticati, na primer:</i></p> <ul style="list-style-type: none"> • rezultata učinka, posebno ako su neočekivani; • neobjavljenog neposrednog uvođenja važnog novog proizvoda ili usluge; • promena izvršnog menadžmenta; • strateške promene u poslovanju; • promena u strukturi kapitala; • meržera, akvizicija ili prodaja bilo koje materijalne imovine ili društva Grupe; <p><i>Dokumentacija koja se odnosi na sednice nadzornih i upravnih organa, kao i sva dokumentacija u vezi sa odlukama višeg menadžmenta, često sadrži insajderske informacije. Takva dokumentacija se, stoga, mora čuvati ne duže nego što je neophodno i tretirati na način najstrože poverljivosti..</i></p> <p>Komunikacija sa određenim eksternim stranama</p> <p><i>Grupa podržava transparentnost finansijskih tržišta, obezbeđujući pažljivo upravljanje komunikacijama sa medijima, finansijskim analitičarima i javnošću. Sve komunikacije prema deoničarima Grupe moraju biti iskrene, pravovremene i tačne.</i></p> <p>Odnošima sa medijima, finansijskim analitičarima, agencijama za rejting, investitorima i organima se upravlja isključivo od strane posebno određenih funkcija. Zaposleni se moraju uzdržavati od davanja informacija o Grupi, ili dokumentaciji koja ih sadrži, drugim stranama, osim ako su ovlašćene.</p> <p>Od zaposlenih se traži da se uzdrže od javnog komentarisanja glasila o Grupi, ukoliko nije potvrđeno iz zvaničnih izvora.</p> <p>ZAPAMTITE: <i>Postavljanje informacija na društvenim mrežama, kao što su LinkedIn, Facebook, Twitter, itd. znače širenje podataka široj javnosti. Stoga moramo biti veoma obazrivi prilikom otkrivanja informacija o Grupi kada koristimo sajtove društvenih medija.</i></p> <p>Sprečavanje pranja novca, terorizma i međunarodne sankcije</p> <p><i>Grupa se obavezala na međunarodnu borbu protiv pranja novca i finansiranja terorizma, suprotstavljanja bilo kom ponašanju koje bi moglo imati nameru</i></p>	<p>In any case, Employees who are planning to deal or to recommend someone to deal in Group securities must fully comply with the applicable laws and Group or local policies.</p> <p>REMEMBER: <i>Inside information may concern, for example:</i></p> <ul style="list-style-type: none"> • performance results, especially if they are unexpected; • unannounced imminent introduction of an important new product or service; • executive management changes; • changes in the strategic direction; • changes in capital structure; • mergers, acquisitions or sales of any material asset or company of the Group. <p><i>Documents related to meetings of supervisory and management bodies, as well as all documents related to senior management decisions, often contain inside information. Such documents must therefore be retained no longer than strictly necessary and handled in the strictest confidence..</i></p> <p>Communicating with certain external parties</p> <p><i>The Group supports the transparency of financial markets, ensuring a careful management of communications with the media, financial analysts and the public.</i></p> <p>All communications towards the Group's stakeholders must be forthright, timely and accurate.</p> <p>Relations with the media, financial analysts, rating agencies, investors and authorities are exclusively managed by specifically designated functions. Employees must refrain from giving information about the Group, or documents containing any, to such parties unless authorized.</p> <p>Employees are requested to abstain from publicly commenting on rumours about the Group, if not confirmed by official sources.</p> <p>REMEMBER: <i>Posting information on social networks, such as LinkedIn®, Facebook®, Twitter® etc. Means spreading data to a wide audience of people. Thus, we must be very careful in disclosing information about the Group when using social media sites.</i></p> <p>Anti-money laundering, anti-terrorist financing and international sanctions</p> <p><i>The Group is committed to the international fight against money laundering and the financing of terrorism, opposing any conduct that could be</i></p>
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<p><i>podržavanja ovih krivičnih dela.</i></p> <p>Relevantni zaposleni mora dobiti i održavati odgovarajuća znanja o klijentima i izvorima sredstava raspoloživim za transakcije koje su predmet politika Grupe ili propisa.</p> <p>Svaki put kada zaposleni posumnja da druga strana pokušava da koristi proizvode ili usluge Grupe za nelegalne radnje, kao što su pranje novca ili finansiranje terorizma, mora odmah obavestiti menadžera koji je određen za izveštavanje o situaciji.</p> <p>Odgovarajući zaposleni mora imati potpuno i ažurno znanje o relevantnim restriktivnim merama koje su usvojene od strane lokalne vlasti i međunarodnih organizacija protiv određenih zemalja, ljudi, imovine ili usluga.</p> <p>Pogledati: “Politika Grupe protiv pranja novca”</p> <p>Konačne odredbe</p> <p>Usvajanje i distribucija</p> <p>Kodeks je odobren od strane Upravnog odbora kompanije Assicurazioni Generali S.p.A. Generalni direktor Grupe je odgovoran za usvajanje Pravila Grupe.</p> <p>Kodeks i Pravila Grupe se usvajaju od strane administrativnih, upravnih i nadzornih tela svakog društva unutar Grupe. Generalni direktori su odgovorni za nadgledanje njihove primene u skladu sa lokalnim pravnim zahtevima.</p> <p>Kodeks zamenjuje bilo koji drugi postojeći kodeks ponašanja unutar Grupe. Sve interne politike moraju biti u saglasnosti sa odredbama Kodeksa.</p> <p>Ukoliko dođe do konflikta između Kodeksa ili Pravila Grupe i lokalnog zakonodavstva, o tome će biti odmah obavešten Compliance Grupe kako bi se obezbedilo uspešno razrešenje.</p> <p>Compliance Grupe ima odgovornost za predlaganje revizija Kodeksa odboru, kako bi se očuvao ažurnim.</p> <p>Kako bi se osiguralo da bude pristupačan i javno dostupan, Kodeks je preveden na sve jezike zemalja u kojima Grupa posluje i objavljen je na korporativnom veb sajtu Grupe – www.generali.com – i na veb sajtovima svake od kompanija unutar Grupe.</p> <p>Obuka</p>	<p><i>intended as supportive of these crimes.</i></p> <p>Relevant Employees must obtain and maintain a suitable knowledge of customers and of the sources of funds made available for transactions subject to Group policies or legislation.</p> <p>Every time Employees suspect that the counterparty is attempting to use the Group's products or services for illegal purposes, such as money laundering or terrorist financing, they must promptly inform the designated reporting manager about the situation.</p> <p>Relevant Employees must have a full and updated knowledge about relevant restrictive measures adopted by the local Government and international organizations against certain countries, people, assets or services.</p> <p>Refer to: „Group Anti-money laundering Policy“</p> <p>Final provisions</p> <p>Adoption and distribution</p> <p>The Code has been approved by the Board of Directors of Assicurazioni Generali S.p.A. The Group CEO is responsible for the adoption of the Group Rules.</p> <p>The Code and the Group Rules are adopted by the administrative, management or supervisory body of each Group company. CEOs are responsible for overseeing their implementation in accordance with local legal requirements.</p> <p>The Code replaces any other existing code of conduct within the Group. All internal policies must comply with the provisions of the Code.</p> <p>Should conflicts arise between the Code or the Group Rules and local legislation, these shall be promptly reported to Group Compliance to ensure a successful resolution.</p> <p>Group Compliance is responsible for proposing to the Board reviews of the Code in order to keep it current.</p> <p>To ensure that it is easily accessible and publicly available, the Code is translated into all the languages of the countries where the Group operates and published on the Group's corporate website - www.generali.com - and on the websites of each company of the Group.</p> <p>Training</p>
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Kako bi se garantovalo da se Kodeks i Pravila Grupe pravilno razumeju i efikasno primenjuju, moraju se organizovati uvodne obuke i godišnji programi obnavljanja obukao usaglasenosti sa Kodeksom i Pravilima Grupe.

Generalni direktori ohrabruju širenje svesti o Kodeksu i Pravilima Grupe i obezbeđuju uključenost svih zaposlenih u programe obuke iz usaglašenosti.

Generalni direktori obezbeđuju da svaki zaposleni dobije jedan primerak Kodeksa.

In order to guarantee that the Code and the Group Rules are properly understood and effectively enforced, introductory and annual refresher compliance training programs must be arranged.

CEOs encourage a widespread awareness of the Code and the Group Rules and ensure the involvement of all Employees in compliance training programs.

CEOs ensure that each Employee is provided with a copy of the Code.