



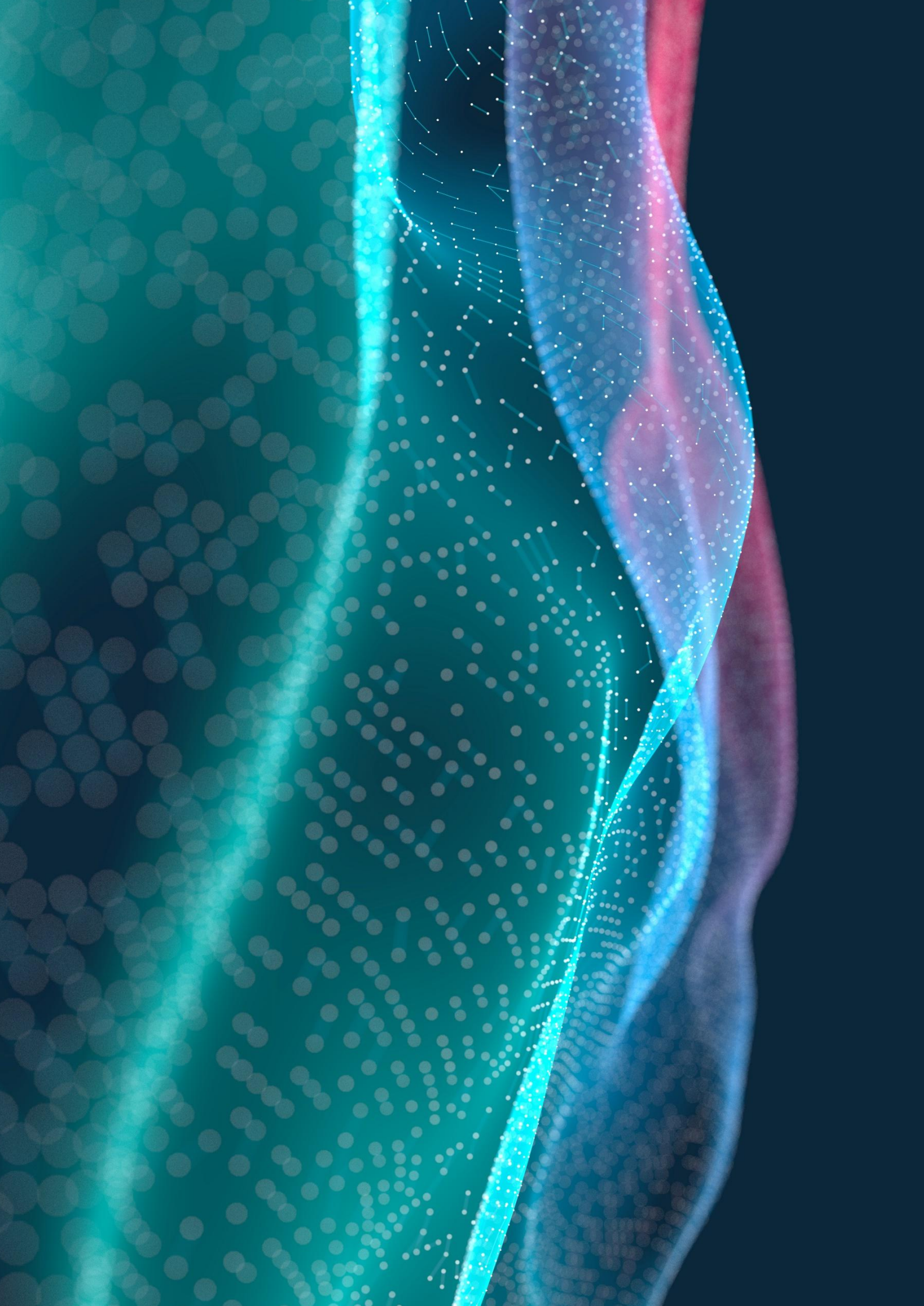
# Group Whistleblowing Policy

Final

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# Introduction

## 1. Background

- 1.1. QBE is committed to fostering a culture grounded in respect, openness, personal accountability, trust, and integrity in our business conduct. This aligns with our QBE DNA and standards of professionalism and conduct outlined in QBE's Code of Ethics and Conduct ('Code').
- 1.2. QBE encourages raising concerns about actual or suspected wrongdoing, including calling out behaviours that fall below the standards in our Code. QBE takes seriously any conduct that fails to meet these expectations.
- 1.3. This Policy encourages and supports the raising of concerns about actual or suspected wrongdoing within QBE's workplace or business.
- 1.4. Where applicable, it must be read in conjunction with any relevant location specific appendix (the 'Appendices') based on the location of the person raising a concern (referred to throughout as the 'reporter' and 'you'). There are Appendices for AusPac (which includes Australia, New Zealand and the Pacific), European Operations, and International-Asia. If there is no location specific appendix, the provisions of this Policy apply in full.

## 2. Purpose

- 2.1. The purpose of this Policy and the Appendices is to:
  - a. establish global principles for QBE's approach to managing disclosures of suspected or actual Reportable Conduct (see section 4);
  - b. outline the protections afforded to a reporter (see section 5);
  - c. set out the available channels for reporting and outline the processes involved following receipt of alleged Reportable Conduct (see sections 6 and 9);
  - d. foster QBE's culture in conducting its business with honesty and integrity; and
  - e. outline consequences for non-compliance with this Policy (see section 11).

## 3. Scope/Application

- 3.1. The Policy applies to all QBE employees, officers, and directors (referred to as 'Employees') and may, depending on the reporter's location, extend to third parties, such as contractors, contingent workers, brokers, suppliers, relatives of Employees, former Employees, and similar individuals.
- 3.2. This is a Group policy. As QBE operates in many jurisdictions you should refer to the Appendices for country-specific guidance, where applicable. If the alleged wrongdoing you wish to report took place or will take place in another country, you should refer to the guidance relating to the country in which you are based.
- 3.3. If you have a query in relation to the interpretation or application of this Policy, please contact Group Investigations at [conduct@qbe.com](mailto:conduct@qbe.com).
- 3.4. This Policy should be read in conjunction with other QBE policies, including but not limited to, the Code.

# Approach

## 4. What is Reportable Conduct?

- 4.1. Reportable Conduct will generally relate to suspected or actual wrongdoing, which the reporter reasonably believes has occurred or is ongoing or is likely to occur.
- 4.2. Employees who have a concern of Reportable Conduct are encouraged to come forward and report those concerns promptly.
- 4.3. It is important to distinguish between the types of matters which will potentially be treated as Reportable Conduct and those matters that will not. This is explained below and set out in the Appendices.



### **Examples of Reportable Conduct**

4.4. The following are non-exhaustive examples of types of conduct or activities which may be considered as Reportable Conduct under this Policy:

- a. a breach of the Code (e.g., improper offering or receiving of gifts or entertainment, or failure to properly disclose and manage conflicts of interest);
- b. a breach of any law (e.g., theft, drug sale/use, violation of human rights, violence or threatened violence and/or property damage), or the commission of any criminal offence;
- c. a failure to comply with, or breach of, legal or regulatory requirements, applicable industry standards, or professional obligations;
- d. dishonest or corrupt conduct (e.g., offering or accepting a bribe);
- e. conduct that endangers (or may endanger) public health, safety, or the environment;
- f. financial malpractice, financial irregularities, money laundering, misappropriation of funds, impropriety, deception, forgery, or fraud;
- g. conduct or activity that may cause financial or non-financial loss or may otherwise be detrimental to the interests, financial position, or reputation of QBE (e.g., substantial mismanagement of QBE's resources or impeding internal or external audit reviews);
- h. misuse of information (e.g., improper access, modification or release, insider trading, or breach of privacy related matters);
- i. experience of or being threatened with retaliation, or Detrimental Treatment (see [definitions](#)) due to raising or intending to raise a concern; and
- j. deliberate concealment, discouragement or knowingly delaying the reporting of the above.

4.5. Refer to the Appendices for an explanation of how Reportable Conduct may be specifically defined in your location.

### **Examples of conduct not covered by this Policy**

4.6. The following issues and concerns are generally not considered Reportable Conduct and will usually fall outside of this Policy (however, please refer to the Appendices for further information):

- a. personal work-related grievances related to your own personal circumstances. These should be reported using local People processes. Examples include, but are not limited to:
  - o interpersonal conflicts, disagreements or disputes between you and another Employee;
  - o decisions relating to your engagement, promotion, remuneration, suspension, terms of employment, demotion or termination of employment or other related issues (unless this is due to Detrimental Treatment for reporting concerns); and
- b. customer complaints.

4.7. If you are an Employee, please refer to the relevant QBE policies and related materials for further information in respect to the above.

4.8. If you are a customer, please refer to QBE's website for customer complaints.

## **5. Protections**

5.1. QBE is committed to protecting reporters raising Reportable Conduct. Broadly QBE has a positive obligation to keep a reporter's identity confidential to the extent possible, by taking reasonable steps to prevent identification, and protect a reporter from being subject to any Detrimental Treatment (see [definitions](#)) as a result of them disclosing Reportable Conduct.

5.2. Similarly, Employees must not subject anyone to Detrimental Treatment, or threaten to do so, because they made, or intend to make, a disclosure. If Employees are involved in such activity, they may be subject to disciplinary action.

5.3. Employees must not seek to identify a reporter at any stage, including after an investigation has concluded.



- 5.4. Refer to the Appendices for an explanation of how Detrimental Treatment may be specifically defined in your location.

## 6. Channels through which to raise a concern

- 6.1. You should refer to the Appendices regarding the channels which are available to you to raise concerns about Reportable Conduct. If there is no appendix for your location then you can raise your concern with your manager, Legal, Compliance, or the People team as appropriate, or use the QBE's Ethics Hotline (see below).

### *Nominated Individuals*

- 6.2. In some locations specific individuals are nominated to receive disclosures of Reportable Conduct (e.g., Eligible Recipients in Australia).
- 6.3. A limited number of individuals based outside of Australia are 'Eligible Recipients' under Australian whistleblowing legislation. This includes officers/directors or senior managers (e.g., Board, CEO & direct reports of CEOs), auditors (internal and external), and actuaries of any of QBE's companies, including any of our related companies. Eligible Recipients should refer to [Appendix B](#) to understand their obligations in circumstances where they receive a disclosure of Reportable Conduct from an Australian whistleblower. If you have a query as to whether you may be an Eligible Recipient, or regarding your obligations, please contact Group Investigations at [conduct@qbe.com](mailto:conduct@qbe.com).

### *Ethics Hotline*

- 6.4. The QBE Ethics Hotline is an independent third-party reporting service provided by NAVEX Global.
- 6.5. Reports may be made anonymously via the Ethics Hotline, depending on location. Please see the Appendices for further information.
- 6.6. Through the Ethics Hotline reporters can communicate confidentially, including anonymously, with the QBE individual managing the report.
- 6.7. Depending on where you are based, the Ethics Hotline can be accessed via a web page, phone, and QBE's intranet toolbox (further details are provided in [Appendix A](#)).
- 6.8. Depending on location, the Ethics Hotline may also be available for external reporters. Please see the Appendices for further information.
- 6.9. Concerns submitted via the Ethics Hotline are not automatically deemed as Reportable Conduct and may not be covered under this Policy.

## 7. Anonymous Reporting

- 7.1. Subject to local requirements in some countries, you are not obliged to disclose your identity and if you choose not to, QBE will respect that decision. Please see the Appendices for further information.
- 7.2. QBE encourages you to share your identity when reporting concerns. This allows QBE to better understand the context of the report, follow up with you directly to clarify information or ask additional questions, and understand how the outcome of an investigation may impact you.

## 8. Confidentiality

- 8.1. QBE is required to keep any reports about Reportable Conduct confidential, to the extent possible, and to the extent permitted and required by law.
- 8.2. If you do decide to disclose your identity, those handling your report will keep your identity confidential to the extent possible and as required by local law, irrespective of which channel was used to raise the concern. Please see the Appendices for further information concerning confidentiality.
- 8.3. If you have previously shared any information about Reportable Conduct with others, stating this in your report will assist QBE in determining the approach.



## 9. Investigations of Reportable Conduct

9.1. Once a report has been made, the reporter will receive an acknowledgement and as appropriate, details of further steps to be taken. Please see the Appendices for further information.

### *Review & Assessment*

9.2. Each disclosure is reviewed and assessed to determine the most appropriate response under this Policy.

9.3. Outcomes of the initial review and assessment may include:

- a. a recommendation to instigate an investigation;
- b. the information is unclear or insufficient to progress, in which case additional information may be requested;
- c. referral to another team, channel, or Division (see [definitions](#)) if the matter is determined not to be a disclosure of Reportable Conduct;
- d. confirmation that the matter has been previously investigated and adequately resolved; or
- e. a determination the report is knowingly untrue or frivolous.

9.4. Where it is concluded that the alleged Reportable Conduct was known to be untrue, Employees may be subject to disciplinary action where appropriate.

### *Investigation*

9.5. Investigations will be conducted in an independent, unbiased, and timely manner.

9.6. QBE will keep the reporter informed of the progress of any investigation to the extent appropriate and its likely timeframe. Appropriate feedback following the conclusion of any investigation will also be provided. The need for privacy and confidentiality may impact the level of detail provided relating to the investigation or any disciplinary action taken as a result. Where the report has been made anonymously, QBE may only be able to share very limited information. Please see the Appendices for more information.

## 10. Making Reports to External Bodies

10.1. While you are encouraged to first raise your concerns internally, it is accepted that there may be circumstances where it is appropriate to report concerns to external bodies such as a relevant governmental agency or a regulator. Please see the Appendices for further information for your location.

## 11. Consequences of Non-compliance with this Policy

11.1. Subject to your location, failure to comply with this Policy (e.g., breaching confidentiality) may result in disciplinary action where appropriate, which may include termination of employment and/or significant regulatory enforcement action, fines, serious reputational damage, and criminal charges.

11.2. Employees must not be subjected to Detrimental Treatment as a result of reporting any concerns. If Detrimental Treatment against an Employee is proven, disciplinary action, including possible termination of employment may occur. In some jurisdictions, subjecting another to Detrimental Treatment can result in personal civil or criminal liability.

## 12. Divisional Adoption & Reporting

12.1. Divisions are expected to adopt the Group Whistleblowing Policy by 'Basic Adoption', as set out in the Group Governing Document Management Standard. Appendices are approved locally.

12.2. Divisions are required to report on Reportable Conduct issues raised under this Policy on an anonymous basis to the Group Compliance team for the purposes of Group Board/Committee reporting.



## 13. Roles & Responsibilities

### ***Group Board Risk & Capital Committee***

13.1. The Group Board Risk & Capital Committee is responsible for:

- a. ensuring that the Group has in place policies and procedures for Employees to confidentially submit information and for dealing with matters raised by Employees;
- b. ensuring that the Group has a process for ensuring Employees are aware of these policies and procedures; and
- c. reviewing reports on material incidents that fall within the Policy.

### ***Group Whistleblowing Committee***

13.2. The Group Whistleblowing Committee ('Committee') is responsible for providing guidance and advice to support the effective handling (including investigation) of matters escalated to it and related identification of current or future risks.

13.3. The Committee consists of the Group Chief Compliance Officer, Group Chief People Officer, Group Chief Risk Officer, Group General Counsel & Company Secretary, with the Head of Group Investigations as Committee Secretary.

### ***Teams/Nominated Individuals responsible for receiving and managing Reportable Conduct***

13.4. Group/Divisional teams who receive and manage Reportable Conduct are responsible for:

- a. implementing this Policy and the Appendices;
- b. ensuring and maintaining confidentiality of reported matters;
- c. providing the necessary support for Employees who raise concerns, whether they are subsequently proven true or not;
- d. reviewing and where needed improving the systems and processes in place; and
- e. referring matters to relevant individuals and teams, including where they do not fall within this Policy.

### ***Employees***

13.5. Employees are responsible for:

- a. complying with all requirements within this Policy;
- b. completing all required learning related to this Policy on time; and
- c. cooperating with investigations, which includes responding to reasonable and lawful requests.



## 14. Definitions

14.1. For the purpose of this Policy and Appendices, the following definitions and acronyms apply.

Appendices	Has the meaning provided in <a href="#">section 1.4</a> .
Controlled Entity	As defined in Australian Accounting Standard AASB 10. Each Controlled Entity is deemed to be part of a Division. Controlled Entities include all QBE insurance and (re)insurance companies, agencies and service companies.  Note: A Controlled Entity / entity may be defined differently or broader depending on Division.
Division	One of QBE Group's operating divisions, including: <ul style="list-style-type: none"> <li>○ AUSPAC (Australia, New Zealand and the Pacific)</li> <li>○ International - European Operations and Asia</li> <li>○ North America</li> <li>○ Equator Reinsurances Limited and any other reinsurance entities, and</li> <li>○ Group Head Office including the Group Shared Services Centre.</li> </ul> References to a Division also apply to countries forming part of that Division.
Detrimental Treatment	Detrimental treatment includes, but is not limited to, dismissal, demotion, disciplinary action, discrimination, harassment, intimidation, reprisals, disadvantage, retaliation, victimisation, threats, or other unfavourable treatment connected with disclosing Reportable Conduct.  You should also refer to the Appendices for an explanation of how Detrimental Treatment (or similar) may be specifically defined in your location .
Employee	Has the meaning provided in <a href="#">section 3.1</a> .
Nominated Individuals	Has the meaning provided in <a href="#">section 6.2</a> .
Policy	Group Whistleblowing Policy.
Reportable Conduct	Has the meaning provided in <a href="#">section 4.1</a> .
QBE	QBE Insurance Group Limited and its Controlled Entities.



## Appendix A: Ethics Hotline Access Details

The Ethics Hotline can be accessed via:

- i. the web page [here](http://www.qbe.ethicspoint.com/) (<http://www.qbe.ethicspoint.com/>) either
  - o directly yourself, or
  - o by asking your manager or other nominated person to do so on your behalf;
- ii. phone for eligible locations, with relevant local numbers available by selecting your location on the web page or referring to the below table (if you experience any difficulties connecting, please utilise the above access methods instead); or
- iii. QBE's intranet toolbox if you are an Employee, which leads you to the web page.

After you complete your report, you will be assigned a unique code called a 'report key'. Write down your report key and password and keep them in a safe place. Use your report key and password to check your report for feedback or questions.

### Ethics Hotline Phone Numbers

Location	Number	From an outside line dial the...
Australia & Group Head Office Australia	1800 270 957	OneConnect number for your location
Belgium	0800 27 181	OneConnect number for your location
Canada	844-241-6854	dial direct for your location
Fiji Islands	00-800 2631	OneConnect number for your location
France	0 801 13 08 69	OneConnect number for your location
Germany	0800 1820854	OneConnect number for your location
Hong Kong	800 968 368	OneConnect number for your location
India	000 800 050 3781	OneConnect number for your location
Ireland	1800 456 825	OneConnect number for your location
Italy	800 931 478	OneConnect number for your location
Malaysia	1-800-81-1037	OneConnect number for your location
New Zealand & Group Head Office New Zealand	0800 448 620	OneConnect number for your location
Philippines	(02) 8540 0725	OneConnect number for your location
Singapore	800 492 2856	OneConnect number for your location
Spain	900 752 123	OneConnect number for your location
UK	0800 031 8430	OneConnect number for your location
United States of America	844-241-6854	dial direct for your location
Vietnam	024 7779 9068	OneConnect number for your location

Argentina, Bermuda, Colombia, Denmark, Dubai (United Arab Emirates), French Polynesia, Japan, Macau, Netherlands, New Caledonia, Solomon Islands, Sweden, Switzerland & Vanuatu	Reports made via the Ethics Hotline may only be filed online for these locations.
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# Appendix B: Whistleblowing laws – Australian entities

## 1. Purpose

- 1.1 The purpose of this Appendix is to ensure QBE's Australian entities and officers and employees comply with the Australian Whistleblower Protection Laws<sup>1</sup> and underline the importance of detailing QBE's approach in handling matters that are within the scope of this Policy.
- 1.2 The Australian Whistleblower Protection Laws aim to:
- encourage Eligible Whistleblowers and protect them from victimisation;
  - maintain Eligible Whistleblowers' confidentiality;
  - prevent fraud and corporate wrongdoing; and
  - strengthen corporate compliance.
- 1.3 This Appendix applies:
- when a whistleblower is an **Eligible Whistleblower**; and
  - their disclosure relates to a **Disclosable Matter**; and
  - their disclosure is made to a **prescribed body** or an **Eligible Recipient**; or
  - their disclosure is made to a **legal practitioner** for the purposes of obtaining legal advice or representation; or
  - under certain, limited circumstances (described below), a disclosure is made to a journalist or a member of an Australian Parliament.
- 1.4 A report made by a discloser in accordance with the foregoing will be a '**Protected Disclosure**' (also known as 'qualifying disclosures' under Australian Whistleblower Protection Laws).
- 1.5 Eligible Whistleblower, Disclosable Matter, prescribed body, and Eligible Recipients are all terms that are described further in the paragraphs below.
- 1.6 If the report does not meet the definition of a Protected Disclosure, it may, in some circumstances, still be managed as a whistleblowing report and the principles of the Policy may still apply. However, in these circumstances, the reporter will not be eligible to access the protections under the Australian Whistleblower Protection Laws.

### 1.7 Who is an 'Eligible Whistleblower'?

An Eligible Whistleblower is a person connected with any Australian QBE entity who is a current or former:

- Officer or employee (e.g., permanent, part-time, fixed-term or temporary, interns, or directors) of an Australian QBE entity;
- Supplier (including employees of a supplier) of goods or services (whether paid or unpaid) to an Australian QBE entity;
- authorised representatives, brokers, and agents of an Australian QBE entity;
- an associate, as defined in the Corporations Act; or
- a relative, dependent, or spouse of any of these individuals.

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<sup>1</sup> 'Australian Whistleblower Protection Laws' refers to the relevant provisions of the *Australian Corporations Act 2001* (Cth) ('Corporations Act'), and/or the *Taxation Administration Act 1953* (Cth) ('Tax Administration Act'), as applicable.



### 1.8 Who are 'Eligible Recipients' and prescribed bodies?

Disclosures must be made to prescribed bodies or Eligible Recipients.

A **prescribed body** may be the Australian Securities and Investments Commission ([ASIC](#)), or the Australian Prudential Regulation Authority ([APRA](#)), or in relation to tax affairs, the Commissioner of Taxation ([Commissioner](#)).

'**Eligible Recipients**' receive disclosures that qualify for protection and do not need to be employed by, or associated with, an Australian entity. They can be any of the following individuals employed or engaged by any of QBE's companies, including any of our related companies in any Divisions:

- an officer/director or senior manager; (e.g., Board, CEO & direct reports of CEOs)\*
- an auditor, or member of an audit team conducting an audit (both internal and external);
- an actuary;
- any of QBE's tax agents (for concerns relating to tax affairs);
- the QBE Ethics Hotline (see [Appendix A](#) for access details);
- any other authorised person. For the purpose of this Appendix, the individual authorised by QBE to receive a Disclosable Matter is the Australia based:
  - Whistleblowing Protection Officer (including [wpo@qbe.com](mailto:wpo@qbe.com)).

\* excluding Executive Assistants

1.9 Disclosures can be made verbally (e.g., in person or on the phone) or in writing (e.g., via email or letter). All contact details for internal Eligible Recipients can be found in QBE systems such as QUBE or Workday. A discloser who is not employed with QBE is encouraged to utilise the Ethics Hotline. When making a report to an Eligible Recipient we encourage you to identify that you are intending to make the disclosure under this Policy.

1.10 Disclosures that qualify for protection under the Corporations Act can also be made to:

- a legal practitioner for the purposes of obtaining legal advice, or legal representation in relation to the operation of the whistleblower provisions in the Corporations Act (even in the event that the legal practitioner concludes that a disclosure does not relate to a 'Disclosable Matter'); and
- to a journalist or a member of an Australian Parliament, in limited circumstances relating to 'emergency disclosures' or 'public interest disclosures'. See section 4 below for further information.

### 1.11 What is a 'Disclosable Matter'?

Disclosable Matters are where there are reasonable grounds to suspect the following:

1. The information being disclosed concerns 'misconduct' and/or an 'improper state of affairs or circumstances' in relation to any of QBE's companies, including any of our related companies. These terms can include failure to comply with a legal duty, gross mismanagement or waste, dishonest or unethical behaviour, fraud or other type of criminal behaviour, negligence, breach of trust, or breach of duty; and/or
2. The information being disclosed indicates that QBE (any of its companies, officers or employees) have engaged in conduct that:
  - would be an offence against, or a contravention of, a provision of any of the following:

i. the Corporations Act 2001;	vi. the Life Insurance Act 1995;
ii. the Australian Securities and Investments Commission Act 2001;	vii. the National Consumer Credit Protection Act 2009;
iii. the Banking Act 1959;	viii. the Superannuation Industry Supervision Act 1993;
iv. the Financial Sector (Collection of Data) Act 2001;	ix. an instrument made under an Act referred to in (i) to (viii); or
v. the Insurance Act 1973;	



- constitutes an offence against any other law of the Commonwealth where prison for a period of 12 months or more is the punishment; or
  - represents a danger to the public or the Australian financial system; or
  - is prescribed by regulation; and/or
3. The information being disclosed relates to misconduct or an improper state of affairs that relate to tax matters under the Tax Administration Act.

Section 4.4 of the Whistleblowing Policy sets out examples of Reportable Conduct that may also fall within the definition of a Disclosable Matter. However, not all Reportable Conduct may meet the definition of a Disclosable Matter, in which case section 1.12 below will apply.

1.12 Disclosures that are not about 'Disclosable Matters' do not qualify for protection under the Australian Whistleblowing Protection Laws. However, QBE encourages Eligible Whistleblowers to speak up if they have reasonable grounds to suspect that the information concerns Disclosable Matters. Eligible Whistleblowers can still qualify for protection even if their disclosure turns out to be incorrect, as long as the discloser had reasonable grounds to suspect the information being disclosed was a Disclosable Matter.

### ***Tax Administration Act***

1.13 To qualify for protection under the Taxation Administration Act 1953 (Cth), the Eligible Whistleblower must have reasonable grounds to suspect that the information indicates misconduct or an improper state of affairs or circumstances in relation to tax affairs of the entity and that the information may assist the Eligible Recipient to perform functions or duties in relation to the tax affairs of QBE or an associate. In addition to the Eligible Recipients outlined (1.8) and legal practitioners (1.10), disclosures in relation to tax can be made to QBE's tax or BAS agents or to any of QBE's employees who have functions or duties that relate to tax affairs.

1.14 Disclosures can also be made to the Commissioner if the Eligible Whistleblower considers that the information may assist the Commissioner to perform their functions or duties under a taxation law in relation to the entity or an associate.

## ***2. Whistleblowing Policy availability***

2.1. QBE's Whistleblowing Policy is:

- available on Insight and QUBE and incorporated in training;
- available, on request, from QBE, including in hard copy; and
- accessible on QBE's public website, [www.qbe.com](http://www.qbe.com).

## ***3. Personal work-related grievances***

3.1. Except as described in the following paragraph, a personal work-related grievance is not a Disclosable Matter. Examples of personal work-related grievances that are not Disclosable Matters include interpersonal conflicts between the discloser and another employee, or decisions relating to employment, such as disciplinary action. A personal work-related grievance that is not a Disclosable Matter should be reported using local People processes.

3.2. Some personal work-related grievances can involve very serious wrongdoing that meets the definition of Disclosable Matter and will entitle the discloser to protection as an Eligible Whistleblower, where reported to an Eligible Recipient. This may include reports of personal work-related grievances that:

- are accompanied by or include information about misconduct;
- concern a detriment to the discloser caused by alleged victimisation;
- have been made to a legal practitioner to obtain legal advice or representation in relation to the operation of the whistleblower provisions in the Corporations Act (see 1.10); or
- have significant implications for QBE and concern alleged conduct that could be a Disclosable Matter.



#### **4. Public interest and emergency disclosures**

- 4.1. In limited circumstances, a Protected Disclosure may be made to a journalist or a member of an Australian Parliament. These limited circumstances are where the disclosure meets the definition of a 'Public Interest Disclosure' or an 'Emergency Disclosure', each as described below. Public Interest Disclosures and Emergency Disclosures do not apply to disclosures made in relation to tax matters made under the relevant provisions of the Tax Administration Act.
- 4.2. Public Interest Disclosures may be made if:
- a) a Protected Disclosure has been previously made to a prescribed body (APRA or ASIC); and
  - b) at least 90 days has passed since the first disclosure was made; and
  - c) the discloser does not have reasonable grounds to believe that action is being, or has been, taken to address the disclosed matter; and
  - d) the discloser has reasonable grounds to believe that making a further disclosure of the information in accordance with this subsection would be in the public interest; and
  - e) at the end of the 90-day period in b), written notification has been provided to ASIC or APRA, as applicable, providing sufficient detail to identify the previous disclosure, and explaining that there is an intent to make a Public Interest Disclosure; and
  - f) the information disclosed is no greater than is necessary to inform the journalist or member of an Australian Parliament of the matter.
- 4.3. Emergency Disclosures may be made in the same circumstances as Public Interest Disclosures, except that:
- a) the requirement for 90 days to have passed in paragraph 4.2b) does not apply;
  - b) the requirement of paragraph 4.2d) does not apply; and
  - c) there must be reasonable grounds to believe that the information to be disclosed concerns substantial and imminent danger to the health or safety of one or more people or to the natural environment.
- 4.4. It is important to understand the criteria for making these disclosures. QBE encourages any potential discloser to obtain their own legal advice before reporting any concern to a journalist or a member of an Australian Parliament.

#### **5. Anonymous disclosures**

- 5.1. Protected Disclosures can be made anonymously. A discloser can choose to remain anonymous while making a disclosure, over the course of the investigation and after the investigation is finalised and may refuse to answer questions that they feel could reveal their identity at any time, including during follow-up conversations.
- 5.2. QBE encourages disclosers to provide their details as this allows QBE to better understand the context of the disclosure, however there is no obligation for Eligible Whistleblowers to disclose their identity. It is suggested that a discloser maintain communication with QBE to enable QBE to request further information, if required.
- 5.3. Disclosures can be made anonymously, including (but not limited to):
- via the QBE Ethics Hotline;
  - by email from an email address from which the person's identity cannot be determined and without identifying themselves in the email; or
  - to Eligible Recipients either anonymously or by an Eligible Whistleblower identifying themselves to the Eligible Recipient and then requesting anonymity from them.
- 5.4. Where the Eligible Whistleblower has identified themselves but requested anonymity, the Eligible Recipient must ensure the identity of the Eligible Whistleblower is protected and not disclosed.



## 6. Confidentiality

- 6.1. QBE will keep a discloser's identity (or information likely to lead to their identity) confidential, except in the following circumstances:
- the discloser consents to this information being disclosed; or
  - it is reasonably necessary to disclose information (other than the identity of the discloser) for the purposes of investigating the disclosure. In such a case QBE will take reasonable steps to reduce the risk of the discloser being identified; or
  - QBE needs to disclose this information to obtain legal advice or representation in relation to the operation of the relevant provisions of the Corporations Act; or
  - QBE reports the information to ASIC, APRA, or the Australian Federal Police; or
  - to a person or body prescribed by regulations.
- 6.2. It is a contravention of the Australian Whistleblower Protection Laws to identify a discloser or disclose information that is likely to lead to their identification, outside the above exceptions. If any person receives information about the identity of a discloser (whether indirectly or directly), they must keep that information confidential (except in the circumstances permitted above). A discloser can lodge a complaint about a breach of confidentiality through the same channels outlined in 1.8 or through the Whistleblower Protection Officer.

## 7. Eligible Whistleblowers' rights

- 7.1. Eligible Whistleblowers will be protected under the Australian Whistleblower Protection Laws from victimisation, threatening or causing detriment, known for the purposes of this Appendix as 'Detrimental Treatment'.

### 7.2. What is Detrimental Treatment?

Detrimental Treatment, which is 'victimisation causing detriment to another person' under Australian Whistleblowing Protection Laws, is conduct or threats of conduct that causes any detriment to another person, where the reason (or part of the reason) is due to a belief or suspicion that a person made, may have made, proposes to make, or could make a Protected Disclosure.

Examples of Detrimental Treatment include, but are not limited to:

- dismissal or demotion of an employee;
- injury of an employee in their employment;
- changing an employee's position or duties to their disadvantage;
- discrimination between an employee and other employees of QBE;
- harassment or intimidation of a person;
- damage to a person's property;
- Physical or verbal threats, that may be expressed or implied, or conditional or unconditional;
- harm or injury to a person, including psychological harm;
- damage to a person's reputation;
- damage to a person's business or financial position;
- or any other damage to a person.

Detrimental Treatment does not include administrative action that is reasonable for the purpose of protecting a person from detriment, or managing unsatisfactory work performance in line with QBE's performance management framework.

- 7.3. QBE does not tolerate Detrimental Treatment of an Eligible Whistleblower and is committed to protecting persons from being victimised in the workplace as a result of an actual or potential Protected Disclosure. QBE will assess the risk of Detrimental Treatment and take such steps and actions as may be necessary to prevent this conduct from occurring.
- 7.4. A discloser may also seek independent legal advice or contact prescribed bodies if they believe they have suffered Detrimental Treatment.



7.5. Eligible Whistleblowers will have access to the Whistleblower Protection Officer ('WPO') who will:

- Maintain confidentiality about the information received, as outlined above;
- Assess and monitor any risks of Detrimental Treatment and take reasonable steps to protect Eligible Whistleblowers from this conduct;
- Ensure investigations they are involved in are conducted in accordance with the principles of this Policy;
- Assist in maintaining the wellbeing of the Eligible Whistleblower;
- Provide the Eligible Whistleblower with updates on progress, as well as details of outcomes on the disclosure they have made; and
- Where an Eligible Whistleblower believes that a disclosure has not been investigated appropriately a WPO may request that the investigation is reviewed.

7.6. The Whistleblower Protection Officer can be contacted on [wpo@qbe.com](mailto:wpo@qbe.com).

## **8. Protections available at law, compensation, and independent legal advice**

8.1. Where a Protected Disclosure is made, the Australian Whistleblower Protection Laws provide that:

- the Eligible Whistleblower cannot be subject to any civil, criminal or administrative liability, for making a Protected Disclosure;
- no contractual or other remedy may be enforced, and no contractual right may be exercised against the Eligible Whistleblower based on the Protected Disclosure;
- if the Protected Disclosure is to a prescribed body, or is a Public Interest Disclosure, or an Emergency Disclosure, the information is not admissible in evidence against the discloser in criminal proceedings, or in proceedings for the imposition of a penalty (except for proceedings in respect of providing false information); and
- except as provided for by the point above, the discloser may be subject to civil, criminal, or administrative liability if it is revealed by the Protected Disclosure that the discloser engaged in misconduct.

8.2. An Eligible Whistleblower is entitled to seek compensation through the courts if:

- They suffer a loss, damage, or injury as a result of Detrimental Treatment as described in section 7 above; and
- QBE fails to take reasonable precautions and exercise due diligence to prevent a person from causing detriment to them.

8.3. In these events, it is recommended that an Eligible Whistleblower should seek independent and external legal advice.

8.4. The whistleblower protections do not grant immunity for misconduct a discloser has engaged in that is revealed in their disclosure.

## **Report Management**

### **9. Investigation**

9.1. QBE will assess each disclosure and determine if it falls within this Policy and whether and how it will be investigated. Where disclosures have been made anonymously, QBE will keep the discloser updated if the discloser maintains communication via their elected channel, including through anonymous channels.

9.2. Investigations will be conducted by skilled individuals who hold roles in QBE with responsibility for managing whistleblowing reports. These individuals will be overseen by others who hold roles with responsibility for protecting or safeguarding Eligible Whistleblowers and for ensuring the integrity of QBE's whistleblowing program.

9.3. On occasions, specialised individuals may be required to assist with an investigation, for example: People Team, Tax, Compliance and/or Legal. Internal Audit may also be required to assist on request in complex and confidential matters. Depending on the nature of the report, its complexity and / or sensitivity, external investigation firms and financial advisers may be engaged to assist.



- 9.4. Appropriate records and documentation will be maintained and stored securely, with the method dependent on the nature of the disclosure and investigation. Investigation outcomes, including findings, will be documented, for example in an investigation report which is provided to the decision maker.
- 9.5. Depending on the circumstances of the disclosure, and any privacy and confidentiality concerns, the outcome will be communicated to the Eligible Whistleblower. In certain circumstance only limited information will be able to be communicated.
- 9.6. Relevant information will be communicated, and deidentified where appropriate, as part of regular reporting, including to Boards and senior management.

## **10. Assessment**

- 10.1. Where a disclosure is made directly to an Eligible Recipient, the Eligible Recipient:
- must confirm if the Eligible Whistleblower would like to remain anonymous or confirm consent to disclose their identity;
  - is required to refer the disclosure to the relevant team (e.g., Group Investigations or AUSPAC's Corporate Investigations Unit) or to the Ethics Hotline; and
  - must not include the Eligible Whistleblower's identity, or information likely to lead to this, if the Eligible Whistleblower advised they would like to remain anonymous or did not provide consent to disclose their identity.
- 10.2. For all disclosures, regardless of how they are made, the relevant individual(s) assigned to review the matter (e.g., Group Investigations or AUSPAC's Corporate Investigations Unit), will assess the report. This includes assessing whether the report:
- has been made by an Eligible Whistleblower; and
  - has been made to an Eligible Recipient; and
  - is a Disclosable Matter.
- 10.3. The relevant individual(s) the matter has been assigned to for review, will then determine whether the report:
- is a Protected Disclosure and an investigation should occur; or
  - is not a Protected Disclosure but should be referred for investigation; or
  - is not a Protected Disclosure and investigation is not required.
- 10.4. QBE will investigate all reports that it determines to be Protected Disclosures, where sufficient information has been provided.

## **11. Knowingly untrue & Frivolous reports**

- 11.1. Employees who raise knowingly untrue reports may face disciplinary action, which in some cases could result in suspension or dismissal from QBE employment.
- 11.2. Where reports are received that raise concerns of a frivolous nature, QBE can decide not to investigate the report.

## **12. Incomplete, wide-ranging and/or non-specific reports ('incomplete reports')**

- 12.1. Where incomplete reports are received, further information should be sought from the discloser.
- 12.2. If no further information is received, QBE may make a decision not to investigate the report.
- 12.3. Where possible, QBE will provide the reasons for a decision not to investigate to the discloser.



### **13. Investigation – Protected Disclosures**

- 13.1. Employees of the company who are mentioned in Protected Disclosures, or to whom disclosures relate, are to be ensured fair treatment through the processes in place, including being provided an opportunity to respond to allegations as and when required. Investigations will be conducted in a procedurally fair manner.
- 13.2. The length of the investigation process may vary depending on the nature and extent of the information provided in the disclosure and how often the discloser communicates. QBE aims to conclude investigations within 90 days from the date of the disclosure. If the disclosure raises complex issues this may impact the ability to finalise the investigation within this period, however QBE will continue to provide updates to the Eligible Whistleblower about the progress and the investigation timeframe.

### **14. Communication**

- 14.1. Communications with an Eligible Whistleblower must occur securely and confidentially.
- 14.2. Where the Protected Disclosure is received by an Eligible Recipient, communications can take place between the two using agreed communication channels (secure email, telephone etc). Confidentiality must be maintained.

### **15. Support to the Eligible Whistleblower**

- 15.1. QBE will offer support to Eligible Whistleblowers while an investigation is conducted. For anybody currently working at QBE and their immediate family members this includes access to the employee assistance program REACH My Best.



# Appendix C: Location Specific Information European Operations

## 1. Background

- 1.1. This is an Appendix to the Group Whistleblowing Policy.
- 1.2. It covers all current and former EO employees, workers, directors, job applicants, new recruits who have not yet commenced work, officers, agency workers, consultants, contractors and their sub-contractors, casual workers, volunteers, those carrying out work experience (paid or unpaid) and shareholders who wish to raise a concern based on information acquired in a work-related context.
- 1.3. The measures relating to protection will also apply where relevant to those who could suffer retaliation in a work-related context. This includes, for example, facilitators who assist a person in the reporting process, third parties connected to the person reporting or legal entities that the person reporting owns, works for, or is otherwise connected with.<sup>1</sup>
- 1.4. This Appendix does not form part of any EO employee's contract of employment and may be amended at any time.

## 2. Responsibilities

- 2.1. The EO Boards have a duty to establish and maintain a mechanism for staff to raise concerns about malpractice, wrongdoing or danger in the workplace.
- 2.2. The (i) EO Director of Compliance; (ii) Senior Compliance Manager, EO Compliance; (iii) Head of Compliance, QBE Europe; and (iv) Compliance Manager, QBE Europe SA/NV Rappresentanza Generale per l'Italia (the **"Whistleblowing Officers"**) have day to day operational responsibility for this Appendix. Contact details for the Whistleblowing Officers can be found in Schedule 1.
- 2.3. The EO Director of Compliance and the Senior Compliance Manager, EO Compliance will have responsibility for all concerns relating to Reportable Conduct (as defined below) raised by individuals based in the UK, Canada, Dubai and Japan.
- 2.4. The Head of Compliance, QBE Europe and the Compliance Manager, QBE Europe SA/NV Rappresentanza Generale per l'Italia will have responsibility for all concerns relating to Reportable Conduct raised by individuals based in Belgium, France, Germany, Italy, Denmark, Spain, Sweden, Switzerland, Netherlands, Colombia, Argentina and Ireland. Where a concern relating to Reportable Conduct is raised in Spain, the Compliance Manager in Spain will share responsibility for determining how a concern relating to Reportable Conduct is addressed to ensure compliance with local requirements.
- 2.5. As explained below, concerns can be raised with line managers and with the Whistleblowing Officers (either directly or through the EthicsPoint platform). In exceptional circumstances, for example where the Whistleblowing Officers are conflicted, it is also possible to raise concerns with the Chair of the Audit Committee. Contact details can be found in Schedule 1.
- 2.6. All EO managers are expected to encourage a positive open working culture. All concerns raised pursuant to this Appendix must be communicated to one of the Whistleblowing Officers as soon as possible.
- 2.7. The EO Audit Committee shall have oversight of any actions taken by the Whistleblowing Officers in relation to any concerns about Reportable Conduct raised pursuant to this Appendix.

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<sup>1</sup> In France this also covers any non-profit legal entity that helps an individual make a report.



### 3. What is whistleblowing?

- 3.1. In general terms, whistleblowing is the disclosure of information (which has been obtained in a professional context) which relates to a genuine concern about suspected or anticipated malpractice, wrongdoing, or a danger in the workplace (“Reportable Conduct”). By way of example, this could include criminal activity, bribery, financial fraud or mismanagement, breaches of policies or procedures or serious conduct likely to damage EO’s reputation or financial wellbeing or the deliberate concealment of such issues.
- 3.2. The concept of whistleblowing, however, is defined differently across EO. European Union countries have been required to adopt legislation enacting the Directive (EU) 2019/1937 of the European Parliament and of the Council of 23 October 2019 on the protection of persons reporting breaches of EU law (the “EU Whistleblowing Directive”) but the approach that has been adopted is not always consistent. Therefore, you should refer to the Schedules for country-specific guidance.
- 3.3. If you are based in one country, but the alleged wrongdoing you wish to report took place in another, you should refer to the Schedule relating to the country in which you are based. If there is not a Schedule for the jurisdiction where you are based, then you should raise any genuine concerns about suspected or anticipated malpractice, wrongdoing, or danger in the workplaces with the Whistleblowing Officers or by following the instructions on <http://www.qbe.ethicspoint.com/>.
- 3.4. If you have any questions as to whether you should be reporting your concern under this Appendix or any other questions regarding whistleblowing, then please contact the Whistleblowing Officers.
- 3.5. This Appendix should not be used to pursue individual grievances or other complaints relating to your own personal circumstances, such as the way you have been treated at work.<sup>2</sup> You should only raise a concern under this Appendix where you reasonably believe that the information you are providing is true. The Whistleblowing Officers may decide that concerns raised under this policy would be more appropriately dealt with under an other EO policy e.g. the UK Grievance Procedure.

### 4. Investigation and process

- 4.1. Once you have raised a concern about Reportable Conduct (as defined above or in the relevant Schedule), you will be notified of receipt within seven days.
- 4.2. The Whistleblowing Officers will carry out a preliminary review of the reported information to establish (with the assistance of legal advice where necessary) whether the reported facts potentially constitute Reportable Conduct. If so, they will initiate an investigation.
- 4.3. If the Whistleblowing Officers consider the reported information does not potentially constitute Reportable Conduct, the information will be immediately deleted or otherwise stored having been anonymised. Such information may be dealt with under a different EO policy or procedure and transferred accordingly. You will be informed of any action taken and will be provided with an explanation.
- 4.4. You may be required to attend meetings to provide further information. Sometimes the need for confidentiality, however, may prevent the Whistleblowing Officers from giving you specific details relating to the investigation or any disciplinary action taken as a result. You should treat any information about the investigation as confidential.
- 4.5. Feedback shall be provided within a reasonable timeframe and not exceeding three months from the date of acknowledgement of the concern.<sup>3</sup> You will be informed of the closure of your concern.

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<sup>2</sup> With the exception of breaches of the Spanish Protocol for the Prevention and Detection of Sexual Harassment and Gender-Based Harassment at Work.

<sup>3</sup> In Spain, feedback may be delayed for a further three months because of the complex nature of the concern. The individual raising the concern will be informed of this.



- 4.6. If it is concluded that a concern has been intentionally raised falsely, maliciously or with a view to personal gain, staff may be subject to disciplinary action as deemed appropriate.

## **5. Confidentiality and data privacy**

- 5.1. If you raise a concern about Reportable Conduct, we would prefer that you identify yourself. This makes it much easier for us to investigate. That said, we would rather issues were raised anonymously than not at all. If you do identify yourself, we will make every effort to keep your identity secret. If it is necessary for anyone other than the Whistleblowing Officers to have access to information from which your identity is obvious or can be inferred for the purposes of managing or investigating your concern, then subject to local legal requirements, the Whistleblowing Officers shall either inform you of this, or seek your consent to make such a disclosure. Your identity may have to be disclosed in the context of a national authority investigation or judicial proceedings. You will be informed in advance of any such disclosure unless this would prejudice the investigation or relevant judicial proceedings. The Whistleblowing Officers shall take all reasonable steps to limit those with access to such information.
- 5.2. There may be circumstances in which it is considered necessary or appropriate for the Whistleblowing Officers to share information with QBE Group Insurance Limited ("Group") or with other divisions. For example, where the concern about Reportable Conduct is concerned with employees based outside of EO or with a Group function. An assessment of the nature, scale and seriousness of the concern shall be carried out by the Whistleblowing Officers to determine whether there is a need to share information outside of EO. If there is such a need, then information shall be shared on a confidential and secure basis. If there a need to disclose the identity of the individual raising the concern or information from which their identity can be inferred, then subject to local legal requirements that individual shall either be informed of this, or their consent shall be sought to make such disclosure.
- 5.3. The Whistleblowing Officers may have to notify the CEO or Chairman of the Audit Committee about the existence of a concern about Reportable Conduct in circumstances where this is considered necessary with reference to the nature, scale and seriousness of the matter raised.
- 5.4. In the handling of any concern about potential Reportable Conduct, EO will comply with any applicable laws on the protection of personal data. Personal data which is clearly not relevant for the processing of a specific concern shall not be collected or if collected accidentally shall be deleted without undue delay.
- 5.5. At any time, you can exercise any applicable rights granted under GDPR and any equivalent local legislation. If you wish to raise a concern about Reportable Conduct through the QBE Ethics Hotline you will be able to access an appropriate privacy notice. Employees should revert to their local Employee Privacy Notice for more information and external parties should refer to <https://qbeeurope.com/privacy-policy/>.

## **6. Protection and support**

- 6.1. EO aims to encourage openness and will support staff who raise genuine concerns under this Appendix.
- 6.2. We are committed to ensuring that you will not suffer any detrimental treatment as a result of raising a concern about Reportable Conduct either internally or externally. Detrimental treatment includes dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern about Reportable Conduct.
- 6.3. You must not threaten or retaliate against staff who have raised a concern about Reportable Conduct. If you are involved in such conduct, you may be subject to disciplinary action.
- 6.4. Anyone requiring additional guidance on this Appendix should contact the Whistleblowing Officers.

## **7. Management information**

- 7.1. All concerns about Reportable Conduct raised pursuant to this Appendix shall be recorded anonymously by the EO Compliance Department.



7.2. Anonymous information in connection with any concern about Reportable Conduct raised pursuant to this Appendix may be provided to:

- Compliance monitoring team to assess the effectiveness of EO's whistleblowing procedures.
- Internal Audit;
- the EO Boards;
- Group Compliance; and
- any appropriate regulator.

## Schedule 1. Whistleblowing Officers and Chair of the Audit Committee Contact Details

Role	Name	Contact details
EO Director of Compliance	Ian Beckerson	<a href="mailto:Ian.Beckerson@qbe.com">Ian.Beckerson@qbe.com</a>
Senior Compliance Manager, EO Compliance	Paul Stephens	<a href="mailto:Paul.Stephens@qbe.com">Paul.Stephens@qbe.com</a>
Head of Compliance, QBE Europe	Stefan Dura	<a href="mailto:Stefan.Dura@qbe.com">Stefan.Dura@qbe.com</a>
Compliance Manager, QBE Europe SA/NV Rappresentanza Generale per l'Italia	Marco Cicala	<a href="mailto:Marco.Cicala@qbe.com">Marco.Cicala@qbe.com</a>
Chair of the Audit Committee	Tim Wade	<a href="mailto:Tim.Wade@qbe.com">Tim.Wade@qbe.com</a>

## Schedule 2. Belgium

### 1. What is whistleblowing?

- 1.1. Whistleblowing is the disclosure of information which relates to a genuine concern about breaches of EU law falling within the scope of the EU Whistleblowing Directive relating to areas including but not limited to financial services; products and markets and the prevention of money laundering and terrorist financing; environmental protection; public health; consumer protection; protection of privacy and personal data; and the security of networks and information systems.
- 1.2. In addition, other serious breaches about malpractice, wrongdoing or dangers in the workplace, including by way of example, criminal activity; failure to comply with any legal or professional obligation or regulatory requirements; bribery; financial fraud or mismanagement; slavery, servitude or compulsory labour and human trafficking within our business or our supply chains; breaches of any EO policy or procedure; conduct likely to damage EO's reputation or financial wellbeing; serious or repeated violations of material internal guidelines; serious harassment; or the deliberate concealment of any of the above, can also be reported under this Appendix.
- 1.3. If you have reasonable grounds to suspect any of the above ("Reportable Conduct") then you can report it under this Appendix provided that:
- you have personal knowledge of the facts (i.e. it is not based on mere rumours);
  - you are not making a disclosure for personal gain or to cause harm; and
  - the report is made in good faith, meaning that you must have a reasonable belief in the truth of what you are reporting in the light of the information to which you have access.

### 2. How to raise an issue

- 2.1. It is hoped that in most cases you will be able to raise any concern about Reportable Conduct under this Appendix with your line manager.



2.2. Where you would prefer not to raise a concern about Reportable Conduct with your line manager for any reason, then you should raise your concern by:

- contacting the Whistleblowing Officers directly (contact details are provided in Schedule 1); or
- following the instructions on <http://www.qbe.ethicspoint.com/>.

2.3. When raising a concern about Reportable Conduct, you should explain the relevant facts in as much detail as you can and provide all relevant documents. You should also explain how you became aware of the facts.

### **3. Data privacy**

3.1. If no disciplinary or legal proceedings are initiated following the conclusion of any investigation into a concern about Reportable Conduct, all personal data relating to the concern shall be deleted promptly and at the latest within two months of the conclusion of the investigation unless there is a legal obligation to retain this data. If disciplinary or legal proceedings are initiated, then personal data shall be retained until the conclusion of these proceedings and the expiry of any relevant appeal period in accordance with legal and regulatory requirements.

3.2. Should you be the object of a concern about Reportable Conduct you will be informed of this by the Whistleblowing Officers when personal data concerning you is processed subject to any relevant legal and regulatory requirements which may prevent this. If providing such information would risk the destruction of evidence or lead to the disclosure of the identity of the whistleblower, the information provided may be delayed or limited. The information provided will include the identity of the person in charge of the investigation, the facts which have been reported as appropriate, the recipients of the concern about Reportable Conduct, and information concerning your rights as regards personal data concerning you. This right does not include the right to know the identity of the whistleblower.

### **4. External disclosures**

4.1. The aim of this Appendix is to provide an internal mechanism for reporting and remedying concerns about Reportable Conduct.

4.2. It is recognised, however, that it may be appropriate for you to report your concerns to an external body.

4.3. The Federal Ombudsman will act as Federal Coordinator for any external reporting ([www.federaalombudsman.be/en](http://www.federaalombudsman.be/en)).

## **Schedule 3. Denmark**

### **1. What is whistleblowing?**

1.1. Whistleblowing is the disclosure of information which relates to a genuine concern about:

- breaches of EU law falling within the scope of the EU Whistleblowing Directive relating to areas including but not limited to: financial services; products and markets and the prevention of money laundering and terrorist financing; environmental protection; public health; consumer protection; protection of privacy and personal data; and the security of networks and information systems; or
- serious offences or other serious matters including by way of example, criminal activity; failure to comply with any legal or professional obligation or regulatory requirements; bribery; financial fraud or mismanagement; slavery, servitude or compulsory labour and human trafficking within our business or our supply chains; breaches of any EO policy or procedure; conduct likely to damage EO's reputation or financial wellbeing; serious or repeated violations of material internal guidelines; serious harassment; or the deliberate concealment of any of the above.

1.2. If you have reasonable grounds to suspect any of the above ("Reportable Conduct") then you can report it under this Appendix.



## **2. How to raise an issue**

- 2.1. It is hoped that in most cases you will be able to raise any concern about Reportable Conduct under this Appendix with your line manager.
- 2.2. Where you would prefer not to raise a concern about Reportable Conduct with your line manager for any reason, then you should raise your concern by:
  - contacting the Whistleblowing Officers directly (contact details are provided in Schedule 1); or
  - following the instructions on <http://www.gbe.ethicspoint.com/>.
- 2.3. When raising a concern about Reportable Conduct, you should explain the relevant facts in as much detail as you can and provide all relevant documents. You should also explain how you became aware of the facts.

## **3. Data privacy**

- 3.1. If no disciplinary or legal proceedings are initiated following the conclusion of any investigation into a concern about Reportable Conduct, all personal data relating to the concern shall be deleted promptly and at the latest within two months of the conclusion of the investigation unless there is a legal obligation to retain this data. If disciplinary or legal proceedings are initiated, then personal data shall be retained as appropriate.
- 3.2. Should you be the object of a concern about Reportable Conduct you will be informed of this by the Whistleblowing Officers once any investigation has concluded. You will be informed that personal data has been processed about you in connection with a concern about Reportable Conduct, what this related to and your connection to the matter. You will also be informed about the scope of the investigation and advised about your rights as regards personal data relating to you.

## **4. External disclosures**

- 4.1. The aim of this Appendix is to provide an internal mechanism for reporting and remedying concerns about Reportable Conduct.
- 4.2. It is recognised, however, that it may be appropriate for you to report your concerns to an external body.
- 4.3. You can report a concern via the Danish Data Protection Agency's external whistleblowing system, either in writing or orally. The Danish Data Protection Agency's whistleblowing system is available via [www.whistleblower.dk](http://www.whistleblower.dk).

## **Schedule 4. France**

### **1. What is whistleblowing?**

- 1.1. Whistleblowing is the disclosure of information concerning facts that have occurred or are very likely to occur relating to:
  - a crime or an offence;
  - a violation of or an attempt to conceal the violation of an international commitment duly ratified or approved by France (for example an international treaty or convention);
  - a violation of or an attempt to conceal the violation of a unilateral act of an international organisation taken on the basis of an international commitment duly ratified or approved by France (for example UN or NATO resolutions);
  - a violation of or an attempt to conceal the violation of the law of the European Union or French law or regulation;
  - a threat or prejudice to the public interest; or
  - conduct concerning acts of corruption including under the Group Anti-Bribery and Corruption Policy or insider trading.



- 1.2. Information concerning matters of national defence, confidential medical issues, judicial debates, judicial investigations or instructions or matters covered by legal privilege cannot be reported under this policy.
- 1.3. Furthermore, the following three conditions must be met:
  - you must have personal knowledge of the facts where the information was not obtained in the course of professional duties;
  - you must not be making the report for direct financial gain; and
  - the report must be made in good faith, meaning that you must have a reasonable belief in the truth of what you are reporting in the light of the information to which you have access and there must be no intention to cause harm.
- 1.4. If you have reasonable grounds to suspect any of the above (“Reportable Conduct”) then you can report it under this Appendix. However, any failure to raise a concern about Reportable Conduct would have no consequence for you.

## **2. How to raise an issue**

- 2.1. You should raise any concern about Reportable Conduct under this Appendix by:
  - contacting the Whistleblowing Officers directly (contact details are provided in Schedule 1); or
  - following the instructions on <http://www.qbe.ethicspoint.com/>.
- 2.2. When raising a concern about Reportable Conduct, you should explain the relevant facts in as much detail as you can and provide all relevant documents. You should also explain how you became aware of the facts.
- 2.3. If you would like to request an in-person meeting (or meeting via Teams) with the Whistleblowing Officers then this will be arranged within twenty days of receipt of your report. Following such meeting, a statement shall be prepared which shall then be agreed with you.
- 2.4. In the event that you raise a concern relating to Reportable Conduct orally through the QBE Ethics Hotline or with the Whistleblowing Officers direct, then you will be asked to approve your statement.
- 2.5. The Whistleblowing Officers perform their duties impartially and cannot be subject to any retaliation for having investigated a concern relating to Reportable Conduct.

## **3. Data privacy**

- 3.1. Following conclusion of an investigation, if the report is not followed by a disciplinary sanction or legal proceedings, data relating to the concern shall be destroyed or stored after having been anonymised within two months of the conclusion of the investigation unless there is a legal reason to retain this data. If a disciplinary sanction is necessary or legal proceedings are threatened or initiated data relating to the reported concern shall be kept in accordance with legal and regulatory requirements.
- 3.2. Should you be the object of a concern about Reportable Conduct you will be informed of this by the Whistleblowing Officers when personal data concerning you is processed subject to any relevant legal and regulatory requirements which may prevent this. If providing such information would risk the destruction of evidence or lead to the disclosure of the identity of the whistleblower, the information provided may be delayed or limited. The information provided will include the identity of the person in charge of the investigation, the facts which have been reported as appropriate, the recipients of the concern, and information concerning your rights as regards personal data concerning you. This right does not include the right to know the identity of the whistleblower.

## **4. External disclosures**

- 4.1. The aim of this policy is to provide an internal mechanism for reporting and remedying any concerns about Reportable Conduct. The law recognises, however, that you may also raise a concern externally with:



- a competent authority as designated by Decree No 2022-1284 of 3 October 2022 ([www.legifrance.gouv.fr/jorf/id/JORFTEXT000046357368](http://www.legifrance.gouv.fr/jorf/id/JORFTEXT000046357368));
- the Defender of Rights, who will direct you to the authority or authorities best placed to deal with the matter who can be contacted: (i) by post free of charge with no stamp (Rights Defender - free reply 71120 - 75342 Paris CEDEX 07); (ii) by filling in the online form [defenseurdesdroits.fr/](http://defenseurdesdroits.fr/) “Saisir le Défenseur des droits”; or (iii) by telephone on 09 69 39 00 00 from Monday to Friday, 8.30 am to 7.30 pm (cost of a local call);
- any relevant judicial authority; or
- an institution, body or agency of the European Union competent to collect information on violations falling within the scope of the EU Whistleblowing Directive.

4.2. You may publicly disclose the concern about Reportable Conduct:

- if no appropriate measures have been taken in response to the concern at the end of the period of feedback;
- in case of serious and imminent danger;
- in the event of imminent or obvious danger to the public, in particular in an emergency or where there is a risk of irreversible harm; or
- if an external disclosure would put you at risk of retaliation or would not allow the subject of the disclosure to be effectively remedied, due to the particular circumstances of the case, in particular if evidence may be concealed or destroyed or if you have serious grounds for believing that there is a conflict of interest, or a relevant authority is colluding or implicated in the situation.

4.3. The second and third bullet points above shall not apply where a public disclosure would be prejudicial to the interests of national defence or security.

## Schedule 5. Germany

### 1. *What is whistleblowing?*

1.1. Whistleblowing is the disclosure of information which relates to a genuine concern about:

- criminal offences;
- administrative offences threatening the life, limb or health of a person or the rights of employees' or their representative bodies; or
- breaches of German law (as detailed in the Hinweisgeberschutzgesetz and the Versicherungsaufsichtsgesetz) and EU law falling within the scope of the EU Whistleblowing Directive relating to areas including but not limited to: financial services; products and markets and the prevention of money laundering and terrorist financing; environmental protection; public health; consumer protection; protection of privacy and personal data; and the security of networks and information systems.

1.2. If you have reasonable grounds to suspect any of the above (“Reportable Conduct”) then you can report it under this Appendix.

### 2. *How to raise an issue*

2.1. It is hoped that in most cases you will be able to raise a concern about Reportable Conduct under this Appendix with your line manager either in person or in writing. Where you would prefer not to raise a concern with your line manager for any reason, then you should raise your concern by:

- contacting the Whistleblowing Officers directly (contact details are provided in Schedule 1); or
- following the instructions on <http://www.qbe.ethicspoint.com/>.



2.2. When raising a concern about Reportable Conduct, you should explain the relevant facts in as much detail as you can and provide all relevant documents. You should also explain how you became aware of the facts.

### **3. Data privacy**

3.1. All documents related to your concern about Reportable Conduct shall be kept for as long as necessary and in any event not longer than three years from the date of the communication of the final outcome. However, documents may be kept longer in order to meet any legal requirements as long as this is necessary and proportionate.

3.2. Should you be the object of a concern about Reportable Conduct you will be informed of this by the Whistleblowing Officers when personal data concerning you is processed subject to any relevant legal and regulatory requirements which may prevent this. If providing such information would risk the destruction of evidence or otherwise damage the assertion, exercise or defence of civil law claims or lead to the disclosure of the identity of the whistleblower, then the provision of information may be delayed or limited. The information provided will include the name and contact details of the person in charge of the investigation, the facts which have been reported as appropriate, the purposes for which the data will be processed, the recipients of the concern, and information concerning your rights as regards personal data concerning you. This right does not include the right to know the identity of the whistleblower.

### **4. External disclosures**

4.1. The aim of this Appendix is to provide an internal mechanism for reporting and remedying concerns about Reportable Conduct. It is recognised, however, that in some circumstances it may be appropriate to raise a concern externally with the external reporting offices of:

- the Federal Office of Justice;
- the Federal Financial Supervisory Authority (BaFin) for breaches that fall under the supervision of BaFin as a financial regulator; or
- the Federal Cartel Office for breaches of European Union or national competition law.

4.2. Further information can be found on the website for the Federal Office of Justice ([www.bundesjustizamt.de/EN/Home/Home\\_node.html](http://www.bundesjustizamt.de/EN/Home/Home_node.html)).

## **Schedule 6. Ireland**

### **1. What is whistleblowing?**

1.1. Whistleblowing is the disclosure of information concerning facts that have occurred, are occurring or are likely to occur relating to:

- an offence;
- a failure to comply with any legal obligation (other than one arising under a contract of employment or terms of engagement);
- a miscarriage of justice has occurred;
- the health and safety of any individual;
- damage to the environment;
- an unlawful or improper use of public money;
- breaches of EU law falling within the scope of the EU Whistleblowing Directive relating to areas including but not limited to: financial services; products and markets and the prevention of money laundering and terrorist financing; environmental protection; public health; consumer protection; protection of privacy and personal data; and the security of networks and information systems;
- oppression, discrimination, gross negligence or gross mismanagement by or on behalf of a public body; and



- concealment or destruction of information (or an attempt to do so) in relation to any of the above matters.
- 1.2. If you have reasonable grounds to suspect any of the above (“Reportable Conduct”) then you can report it under this Appendix.

## **2. How to raise an issue**

- 2.1. It is hoped that in most cases you will be able to raise a concern about Reportable Conduct under this Appendix with your line manager either in person or in writing. Where you would prefer not to raise a concern with your line manager for any reason, then you should raise your concern by:
- contacting the Whistleblowing Officers directly (contact details are provided in Schedule 1); or
  - following the instructions on <http://www.gbe.ethicspoint.com/>.
- 2.2. When raising a concern about Reportable Conduct, you should explain the relevant facts in as much detail as you can and provide all relevant documents. You should also explain how you became aware of the facts.

## **3. Data privacy**

- 3.1. All documents related to your concern about Reportable Conduct shall be kept for as long as necessary and then deleted.
- 3.2. It may be necessary to disclose your identity in any disciplinary proceedings related to your concern.

## **4. External disclosures**

- 4.1. The aim of this Appendix is to provide an internal mechanism for reporting and remedying concerns about Reportable Conduct.
- 4.2. It is recognised, however, that there may be circumstances where it is appropriate for you to report your concerns to an external body such as the Office of the Protected Disclosures Commissioner (please see their website [www.opdc.ie](http://www.opdc.ie) for further information) or the Central Bank of Ireland.
- 4.3. Before reporting a concern to anyone external you may wish to contact Transparency International Ireland (<https://transparency.ie/>) which offers a safe and confidential information and support service, as well as access to free legal advice on making disclosures.

## **Schedule 7. Italy**

### **1. What is whistleblowing?**

- 1.1. Whistleblowing is the disclosure of information which relates to a genuine concern about breaches of EU law or Italian law which harm the public interest or the integrity of EO.
- 1.2. Breaches that can be reported consist of:
- a) administrative, accounting, civil or criminal offences;
  - b) unlawful conduct under Legislative Decree No. 231/2001 or violations of organisational models required under this law (Model 231);
  - c) offences falling within the scope of EU or Italian law;
  - d) acts or omissions affecting the financial interests of the EU (i.e. relating to fraud);
  - e) acts or omissions affecting the internal market (the free movement of goods, persons, services and capital) including violations of EU competition law, state aid rules and laws relating to corporate taxation;
  - f) acts or conduct that frustrate the object or purpose of EU law relating to the matters referenced in c), d) or e) above.



1.3. You should not report the following under this Appendix:

- objections, claims, or requests linked to your personal interest;
- reports of breaches where there are already mandatory reporting channels regulated by EU or national acts; or
- reports of breaches relating to national security or procurement relating to defence or national security unless covered by relevant secondary EU law.

1.4. Individuals should refer to the [Organisation, Management and Control Model according to Legislative Decree No. 231/2001 of QBE Europe SA/NV, General Representation for Italy](#) for more information on the Model 231.

1.5. If you have reasonable grounds to suspect any of the above (“Reportable Conduct”) then you can report it under this Appendix.

## **2. How to raise an issue**

2.1. If your concern about Reportable Conduct relates to a potential violation of the Model 231, then you can send a report through a written communication to the Supervisory Board of QBE Europe SA/NV - General Representation for Italy, Via Melchiorre Gioia n. 8, 20124, Milan

2.2. Alternatively, you can:

- contact the Whistleblowing Officers directly (contact details are provided in Schedule 1); or
- follow the instructions on <http://www.qbe.ethicspoint.com/>.

2.3. When raising a concern about Reportable Conduct, you should explain the relevant facts in as much detail as you can and provide all relevant documents. You should also explain how you became aware of the facts.

2.4. The terms of this Appendix will apply irrespective of whether you raise your concern with the Italian Supervisory Board, with the Whistleblowing Officers or through the QBE Ethics Hotline.

2.5. In the event that you raise a concern orally through the QBE Ethics Hotline or with the Whistleblowing Officers direct, then you will be asked to approve your statement.

## **3. Data privacy**

3.1. If disciplinary proceedings are initiated on the basis of your concern about Reportable Conduct and we consider that knowledge of your identity (or information from which your identity may be inferred) would be material for any defence, then we will seek your consent to disclose your identity or the relevant information as part of these proceedings. We will explain to you why we believe disclosure of your identity is necessary.

3.2. All documents related to your concern shall be kept for as long as necessary and in any event not longer than five years from the date of communication of the final outcome.

## **4. Italian Supervisory Board**

4.1. The Italian Supervisory Board consists of the following individuals:

Role	Name
Compliance Manager, QBE Europe SA/NV Rappresntanza Generale per l'Italia	Marco Cicala
External consultant	Gianluca Mulè

## **5. External disclosures**

5.1. The aim of this Appendix is to provide an internal mechanism for reporting and remedying concerns about Reportable Conduct.



- 5.2. It is recognised, however, that in the following circumstances, it may be appropriate for you to report your concerns to an external body:
- if the reporting channels provided in this Appendix do not comply with Italian law;
  - you have raised a concern under this Appendix and it has not been addressed in accordance with Section 4.0 above;
  - you have reasonable grounds to believe that your concern would not be investigated or you have reasonable grounds to believe that you would be retaliated against; or
  - you have reasonable grounds to believe that there is an imminent or obvious danger to the public.
- 5.3. You may make an external disclosure through the National Anti-Corruption Authority (ANAC)'s external reporting channel. Further information can be found on ANAC's website, [www.anticorruzione.it/-/whistleblowing](http://www.anticorruzione.it/-/whistleblowing).

## **Schedule 8. Netherlands**

### **1. What is whistleblowing?**

- 1.1. Whistleblowing is the disclosure of information which relates to a genuine concern about:
- a suspected act or omission whereby the public interest is at stake in the violation of a statutory provision, a danger to the safety of persons, a danger to the deterioration of the environment, a danger to the proper functioning of the public service or an enterprise as a result of an improper act or omission, not being a breach of Union law; or
  - breaches of EU law falling within the scope of the EU Whistleblowing Directive relating to areas including but not limited to: financial services; products and markets and the prevention of money laundering and terrorist financing; environmental protection; public health; consumer protection; protection of privacy and personal data; and the security of networks and information systems.
- 1.2. If you have a genuine concern relating to any of the above ("Reportable Conduct") then you should report it under this Appendix.

### **2. How to raise an issue**

- 2.1. You can raise a concern about Reportable Conduct by:
- 2.2. contacting the Whistleblowing Officers directly (contact details are provided in Schedule 1); or
- 2.3. following the instructions on <http://www.qbe.ethicspoint.com/>.
- 2.4. Your concern can be made in writing or orally (by speaking to the Whistleblowing Officers or using the Ethics Hotline) or at your request in person.
- 2.5. When raising a concern, you should explain the relevant facts in as much detail as you can and provide all relevant documents. You should also explain how you became aware of the facts.

### **3. Data privacy**

- 3.1. Following conclusion of an investigation, if the report is not followed by a disciplinary sanction or legal proceedings, data relating to the concern about Reportable Conduct shall be destroyed or stored after having been anonymised within two months of the conclusion of the investigation unless there is a legal reason to retain the information. If disciplinary or legal proceedings are threatened or initiated data relating to the report shall be kept in accordance with legal and regulatory requirements.

### **4. External reporting**

- 4.1. The aim of this Appendix is to provide an internal mechanism for reporting and remedying concerns about Reportable Conduct.



4.2. It is recognised, however, that in the following circumstances, it may be appropriate for you to report your concerns to an external body such as:

- The investigation department of the Dutch Whistleblowers Authority ('Huis voor Klokkeluiders');
- The Netherlands Authority for Consumers & Markets ('Autoriteit Consument & Markt' ('ACM'));
- The Dutch Authority for Financial Markets ('Autoriteit Financiële Markten' ('AFM'));
- The Dutch Data Protection Authority ('Autoriteit Persoonsgegevens' ('AP'));
- De Nederlandsche Bank ('DNB');
- Dutch Healthcare Authority ('Nederlandse Zorgautoriteit' ('NZa'));
- Health and Youth Care Inspectorate ('Inspectie Gezondheidszorg en Jeugd' ('IGJ'));
- Authority for Nuclear Safety and Radiation Protection ('Autoriteit Nucleaire Veiligheid en Stralingsbescherming' ('ANVS')).

## Schedule 9. Spain

### 1. *What is whistleblowing?*

1.1. Whistleblowing is the disclosure of information which relates to a genuine concern about:

- acts or omissions which constitute an infringement of EU law, provided that the breaches of EU law: (i) fall within the scope of the EU Whistleblowing Directive relating to areas including but not limited to financial services; products and markets and the prevention of money laundering and terrorist financing; environmental protection; public health; consumer protection; protection of privacy and personal data; and the security of networks and information systems; or (ii) affect the financial interests of the EU (i.e. relating to fraud); or (iii) have an impact on the internal market (the free movement of goods, persons, services and capital);
- acts or omissions that may constitute a serious or very serious criminal or administrative offence in Spain;
- breaches of labour law in the field of health and safety at work and breaches of legal obligations which are in the public interest; and
- breaches of the Protocol for the Prevention and Detection of Sexual Harassment and Gender-Based Harassment at Work.

1.2. The following categories of information are excluded from the scope of Spanish whistleblowing law: classified information; information essential to the security of the State; and information protected by legal, professional, medical or judicial secrecy.

1.3. If you have a genuine concern relating to any of the above or any other suspected serious impropriety in the workplace involving managers, key personnel or employees in a leadership position ("Reportable Conduct") then you should report it under this Appendix.

### 2. *Responsibilities*

2.1. The Compliance Manager in Spain has been appointed as the manager of the internal information system in compliance with According to Article 5 of the Spanish Whistleblowing Act.

2.2. Where a concern has been raised in Spain, the Compliance Manager in Spain and the Whistleblowing Officers will determine how matters should be addressed.

### 3. *How to raise an issue*

3.1. It is hoped that in most cases you will be able to raise any concern about Reportable Conduct under this Appendix with your line manager either in person or in writing.



- 3.2. Where you would prefer not to raise a concern with your line manager for any reason, then you should raise your concern by:
- contacting the Whistleblowing Officers directly (contact details are provided in Schedule 1);
  - following the instructions on <http://www.qbe.ethicspoint.com/>.
- 3.3. If you would like to request an in person meeting with the Whistleblowing Officers or the Compliance Manager in Spain then this will be arranged within seven days. When raising a concern, you should explain the relevant facts in as much detail as you can and provide all relevant documents. You should also explain how you became aware of the facts.

#### **4. Data privacy**

- 4.1. We will retain data only for as long as necessary to investigate the facts of a concern about Reportable Conduct unless there is a legal obligation to retain the data. If it is established that some or all of the information provided is untrue, this information shall be deleted immediately as soon as this becomes known, unless the failure to provide truthful information could constitute a criminal offence, in which case the information shall be kept until the conclusion of any legal proceedings. In any case, if no investigation has been initiated within three months of receiving a concern, we will delete the data relating to the concern and will only record in anonymised form.
- 4.2. Should you be the object of a concern about Reportable Conduct you will be informed of this by the Whistleblowing Officers or the Compliance Manager in Spain when personal data concerning you is processed subject to any relevant legal and regulatory requirements which may prevent this. If providing such information would risk the destruction of evidence or lead to the disclosure of the identity of the whistleblower, the information provided may be delayed or limited. The information provided will include the facts which have been reported as appropriate and information concerning your rights as regards personal data concerning you. This right does not include the right to know the identity of the whistleblower. You will be provided with the right to be heard throughout any relevant investigation.
- 4.3. If, after investigation, it is established that the facts may constitute a criminal offence, it will be necessary to report the matter to the Public Prosecutor's Office or to the European Public Prosecutor's Office if the facts affect the financial interests of the European Union.

#### **5. External disclosures**

- 5.1. The aim of this Appendix is to provide an internal mechanism for reporting and remedying any concerns about Reportable Conduct.
- 5.2. It is recognised, however, that in some circumstances, it may be appropriate for you to report your concerns to an external body.
- 5.3. You may make an external disclosure to the Spanish Independent Authority for the Protection of Whistleblowers<sup>4</sup> or to any corresponding regional authority or body.

## **Schedule 10. Sweden**

### **1. What is whistleblowing?**

- 1.1. Whistleblowing is the disclosure of information which relates to a genuine concern about:
- breaches of EU law falling within the scope of the EU Whistleblowing Directive relating to areas including but not limited to: financial services; products and markets and the prevention of money laundering and

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<sup>4</sup> To be established shortly



terrorist financing; environmental protection; public health; consumer protection; protection of privacy and personal data; and the security of networks and information systems; or

- serious offences or other serious matters including by way of example, criminal activity; failure to comply with any legal or professional obligation or regulatory requirements; bribery; financial fraud or mismanagement; slavery, servitude or compulsory labour and human trafficking within our business or our supply chains; breaches of any EO policy or procedure; conduct likely to damage EO's reputation or financial wellbeing; serious or repeated violations of material internal guidelines; serious harassment; or the deliberate concealment of any of the above.

1.2. If you have reasonable grounds to suspect any of the above ("Reportable Conduct") then you can report it under this Appendix.

## 2. How to raise an issue

2.1. It is hoped that in most cases you will be able to raise any concern about Reportable Conduct under this Appendix with your line manager either in person or in writing.

2.2. Where you would prefer not to raise a concern with your line manager for any reason, then you should raise your concern by:

- contacting the Whistleblowing Officers directly (contact details are provided in Schedule 1); or
- following the instructions on <http://www.qbe.ethicspoint.com/>.

2.3. When raising a concern, you should explain the relevant facts in as much detail as you can and provide all relevant documents. You should also explain how you became aware of the facts.

## 3. Data privacy

3.1. All documents related to your concern about Reportable Conduct shall be kept for as long as necessary and in any event not longer than two years from the date of the communication of the final outcome.

## 4. External disclosures

4.1. The aim of this Appendix is to provide an internal mechanism for reporting and remedying any concerns about Reportable Conduct.

4.2. It is recognised, however, that in some circumstances, it may be appropriate for you to report your concerns to an external body including the following:

Authority	The Authority's Area of Responsibility
Fastighetsmäklarinspektionen, Finansinspektionen, länsstyrelserna i Stockholms, Västra Götalands och Skåne län, Revisorsinspektionen och Spelinspektionen.	Breaches falling within the scope of financial services, products and markets, and prevention of money laundering and terrorist financing that is covered by the authority's supervisory responsibility.
Arbetsmiljöverket.	Breaches not covered by another authority's supervisory responsibility.

## 5. Other rights

5.1. Please note that under the Swedish Freedom of Press Act (Sw. *tryckfrihetsförordningen*) and the Swedish Fundamental Law on Freedom of Expression (Sw. *yttrandefrihetsgrundlagen*) everyone is free to communicate information on any subject whatsoever for the purpose of publication in programmes or technical recordings



(freedom to communicate information, Sw. *meddelarfrihet*) as well as right to procure information on any subject whatsoever in order to communicate or publish it (freedom to procure information, Sw. *anskaffarfrihet*). If you are an employee, duties of loyalty to your employer may restrict these rights.

## Schedule 11. United Kingdom

### 1. *What is whistleblowing?*

1.1. Whistleblowing is the disclosure of information which relates to a genuine concern about suspected malpractice, wrongdoing or dangers in the workplace. By way of example, this may include:

- criminal activity;
- failure to comply with any legal or professional obligation or regulatory requirement;
- miscarriages of justice;
- danger to health and safety;
- damage to the environment;
- bribery;
- financial fraud or mismanagement;
- slavery, servitude or compulsory labour and human trafficking within our business or our supply chains;
- breaches of any EO policy or procedure;
- conduct likely to damage EO's reputation or financial wellbeing; or
- the deliberate concealment of any of the above matters.

1.2. If you have reasonable grounds to suspect any of the above ("Reportable Conduct") then you can report it under this Appendix.

### 2. *Whistleblowers' Champion*

2.1. Whilst the Whistleblowing Officers retain day to day responsibility for this policy, in the UK, a non-executive director shall be allocated responsibility for overseeing the independence, autonomy and effectiveness of the UK regulated entities' procedures on whistleblowing pursuant to the UK Senior Managers and Certification Regime (the "Whistleblowers' Champion").

### 3. *How to raise an issue*

3.1. It is hoped that in most cases you will be able to raise any concern about Reportable Conduct under this Appendix with your line manager either in person or in writing.

3.2. Where you would prefer not to raise a concern with your line manager for any reason, then you should raise your concern by:

- contacting the Whistleblowing Officers directly (contact details are provided here); or
- following the instructions on <http://www.qbe.ethicspoint.com/>.

3.3. When raising a concern, you should explain the relevant facts in as much detail as you can and provide all relevant documents. You should also explain how you became aware of the facts.

### 4. *Data privacy*

4.1. All documents related to your concern about Reportable Conduct shall be kept for as long as necessary.

### 5. *External disclosures*

5.1. The aim of this policy is to provide an internal mechanism for reporting and remedying any concerns about Reportable Conduct.



5.2. It is recognised, however, that in some circumstances, it may be appropriate for you to report your concerns to an external body. For example, where your concern relates to the operation of EO's insurance business or any other regulated activities it may be appropriate to report your concern directly to the relevant regulator, for example the FCA ([www.fca.org.uk/firms/whistleblowing](http://www.fca.org.uk/firms/whistleblowing)) or the PRA ([www.bankofengland.co.uk/whistleblowing](http://www.bankofengland.co.uk/whistleblowing)). Before reporting a concern to anyone external you may wish to contact the independent whistleblowing charity, Protect, which operates a confidential helpline. Please see their website for further information (Website: <https://protect-advice.org.uk/contact-protect-advice-line/>). They also have a list of prescribed regulators for reporting certain types of concern.



# Appendix D: Location Specific Information Asia

## 1. Reporting Channels

1.1. The channels to report concerns in Asia are:

- [QBE Ethics Hotline](#) (the information you provide via this channel is on a confidential basis and if you have chosen it, anonymous)
- Direct manager
- People Team
- Compliance

## 2. Whistleblowing Protections

2.1. Whistleblowing protection may be accorded for reports made under the following legislations.

Country	Legislation
Hong Kong	Employment Ordinance Common Law
Malaysia	Whistleblower Protection Act 2010
Singapore	Prevention of Corruption Act 1960 Employment Act Common Law
Vietnam	Anti-Corruption Law Labour Code 2019



# Appendix E: Location Specific Information AUSPAC

QBE Australia Pacific (“**AUSPAC**”) includes the following entities:

- QBE Insurance (Australia) Limited, including its New Zealand branch;
- QBE Lenders’ Mortgage Insurance Limited;
- QBE Insurance (International) Ltd; and
- such other entities operating as part of the AUSPAC division from time to time.

The Purpose (section 2) and the Scope/Application (section 3) of the Group Whistleblowing Policy apply subject to the specific country requirements as outlined in this Appendix.

## **1. AUSPAC Roles and Responsibilities**

### **AUSPAC Board Audit Committee**

1.1. The AUSPAC Board Audit Committee is responsible for:

- a. Ensuring that AUSPAC has in place a whistleblower policy and processes and procedures for effectively dealing with disclosures received under the policy;
- b. Ensuring the policy is implemented appropriately and consistently carried out in practice;
- c. Ensuring that there are adequate processes in place within AUSPAC for training and advising AUSPAC Employees on the policy and procedures;
- d. Having in place an arrangement for periodically reviewing and updating the policy; and
- e. Ensuring that broader trends, themes and/or emerging risks highlighted by the disclosures made under the policy are addressed and mitigated by the entity as part of its risk management.

### **AUSPAC Chief Risk Officer**

1.2. The AUSPAC Chief Risk Officer is responsible for:

- a. Providing periodic reporting to the AUSPAC Board Audit Committee on material incidents received under the policy along with broader trends, themes and/or emerging risks arising from disclosures;
- b. Ensuring that there are processes and procedures in place within AUSPAC to support the receipt and investigation of disclosures made under the policy;
- c. Ensuring that there are processes in place for monitoring the independent third-party reporting service;
- d. Ensuring there is a process in place to escalate matters to the AUSPAC Board Audit Committee when required,
- e. Ensuring there are processes in place for monitoring the effective implementation of the policy, including training and awareness; and
- f. Ensuring that there are processes in place for periodically reviewing and updating the policy.

### **AUSPAC Executive Management Board Members**

1.3. The AUSPAC Executive Management Board Members are responsible for:

- a. Ensuring their employees are trained on, and are aware of the whistleblower policy and procedures;
- b. Fostering a positive and open environment where employees feel they can come forward and make a disclosure;
- c. Ensuring disclosures are taken seriously and acted on immediately;
- d. Ensuring wrongdoing is addressed promptly;
- e. Ensuring disclosers are provided with adequate protections and support; and
- f. Ensuring early interventions are made to protect disclosures from detriment.



## Whistleblower provisions – Australia

- 1.1. Disclosers connected with any Australian QBE entity are required to refer to 'Appendix B: Whistleblowing Laws – Australian entities. Where the conduct, to any extent, involves QBE's Australian entities, then Australian Whistleblowing laws (as set out in [Appendix B](#)) may also apply.
- 1.2. QBE Eligible Recipients receiving disclosures do not need to be employed by or associated with an Australian entity and can include individuals from any of QBE's companies (see [Appendix B](#)).

*The following location specific information applies to Reportable Conduct where the discloser is in New Zealand or the Pacific or the conduct is connected to the country operations listed below in this Appendix.*

## Whistleblower provisions – New Zealand

### 1. Legal Protections

- 1.1. Protections under the Protected Disclosures (Protection of Whistleblowers) Act 2022 (PDA) will apply where the discloser:
  - believes on reasonable grounds that there is, or has been, serious wrongdoing in or by the discloser's organisation; and
  - discloses information about that in accordance with the PDA; and
  - does not disclose it in bad faith; and
  - meets criteria for protection set out in the PDA.
- 1.2. The Insurance Prudential Supervision Act 2010 (IPSA) covers disclosures made by designated individuals associated with insurers and the protections that apply.

### 2. Criteria for protection as a whistleblower

- 2.1. For PDA-related disclosures, disclosers can be current or former employees of an organisation or other individuals as prescribed in section 8 of the PDA and where the disclosure relates to 'serious wrongdoing', which includes any act, omission, or course of conduct that is:
  - An offence;
  - A serious risk to the health or safety of any individual, to public health or safety, or to the environment;
  - A serious risk to the maintenance of the law including the prevention, investigation and detection of offences or the right to a fair trial;
  - An unlawful, corrupt or irregular use of public funds or public resources;
  - Oppressive, unlawfully discriminatory, or grossly negligent, or that is gross mismanagement, and is done by a public section employee or a person performing a function or duty or exercising a power on behalf of a public section organisation or the New Zealand government.
- 2.2. Where a potential discloser is unsure about the information they wish to disclose they can contact the New Zealand Ombudsman for advice.
- 2.3. For IPSA-related disclosures, you must be an auditor of QBE or QBE's appointed actuary (as defined under IPSA).

### 3. Disclosure

- 3.1. A discloser may make a protected disclosure to their organisation or to an appropriate authority. Disclosures to QBE can be made via QBE's internal procedures (as set out in the Group Whistleblowing Policy).
- 3.2. Appropriate authorities include:
  - a head of any public sector organisation;
  - any officer of Parliament (excluding Ministers and members of Parliament);



- any of the persons or bodies listed as examples in schedule 2 of the PDA.
- 3.3. Examples of appropriate authorities are listed at section 7 of this Appendix. There may be other appropriate authorities that can receive disclosures however this also depends on the nature of the disclosure.
  - 3.4. Within 20 working days of receiving a protected disclosure the receiver (either an organisation or appropriate authority) should acknowledge to the discloser the receipt of the disclosure, consider whether it warrants investigation and deal with the matter as set out in the PDA.
  - 3.5. The receiver should inform the discloser about what they have done or are doing to deal with the matter. If the receiver is unable to deal with the matter within 20 working days then they should inform the discloser about what they have done or are doing to deal with the matter and how long it will take.
  - 3.6. If the discloser believes on reasonable grounds that the receiver of a protected disclosure has not acted as it should to address the serious wrongdoing, the discloser may make the disclosure to the Ombudsman or a government Minister.
  - 3.7. For IPSA-related disclosures the disclosure must be made to the Reserve Bank of New Zealand (RBNZ) in accordance with section 127 of IPSA (but you must have advised QBE in the first instance).

#### **4. Specific protections provided under the PDA**

- Protection of identity of disclosers, subject to specific circumstances where release of identifying information is permitted;
  - Prohibition on retaliatory or unfavourable treatment of a discloser who is an employee;
  - No civil, criminal, or disciplinary proceedings can be taken against a person for making a protected disclosure, or for referring one to an appropriate authority;
  - Prohibition on contracting out of PDA protections for protected disclosures.
- 4.1. A disclosure is not protected if the discloser knows the allegations are false, the discloser acts in bad faith, or the information being disclosed is protected by legal professional privilege.

#### **5. Specific protections provided under IPSA**

- 5.1. For IPSA-related disclosures, where the above persons make disclosures as described above under IPSA, they will have the following protections:
  - protection from civil, criminal, or disciplinary proceedings arising from the disclosure in good faith of information to the RBNZ under section 127;
  - protection from orders against, or acts in relation to that person by any tribunal, body, or authority having jurisdiction in respect of their professional conduct in relation to the disclosure;
  - such information given under section 127 is not admissible in evidence in any proceedings against the auditor or actuary concerned.

#### **6. QBE reporting channels**

- 6.1. Ethics Hotline phone number: 0800 448 620
- 6.2. Online see link to [Web page](#)

#### **7. External reporting channels**

- |   |   |
|---|---|
| <ol style="list-style-type: none"> <li>7.1. New Zealand Ombudsman<br/>Phone: 0800 802 602<br/>Email: <a href="mailto:info@ombudsman.parliament.nz">info@ombudsman.parliament.nz</a><br/>Write: PO Box 10152, Wellington 6143</li> </ol> | <ol style="list-style-type: none"> <li>7.2. Reserve Bank of New Zealand<br/>Phone: +64 4 471 3657<br/>Email: <a href="mailto:whistleblowing@rbnz.govt.nz">whistleblowing@rbnz.govt.nz</a><br/>Write: PO Box 2498, Wellington 6140, New Zealand</li> </ol> |
|---|---|



### 7.3. Financial Markets Authority

Phone: 0800 434 567, +64 4 472 9830

Email: [questions@fma.govt.nz](mailto:questions@fma.govt.nz)

Write: PO Box 1179, Wellington 6140

## Whistleblower provisions – Fiji

### 1. Legal Protections

- 1.1. The *Companies Act 2015* sets out protections available to disclosers where there is a contravention of the Act and the circumstances where a disclosure will qualify for protection and protections that will apply to these disclosures.
- 1.2. There are also legal protections in *Prevention of Bribery Act 2017* that provides for protections for informants to the extent that no witness in a civil or criminal trial may be required to disclose the identity of an informer or answer any question which might lead to the discovery of the person.

### 2. QBE reporting channels

- 2.1. Ethics Hotline Phone number: 00 – 800 – 2631 (Phone and website)
- 2.2. Online see link to [Web page](#)

### 3. External reporting channels

- 3.1. In addition to the Ethics Hotline contacts outlined in the Whistleblower policy, where the discloser is located in Fiji or relates to a person or conduct connected to QBE AUSPAC's business in Fiji the disclosure can be made directly to:
- 3.2. Reserve Bank of Fiji (RBF)  
Phone: (679) 331 3611  
Email: [info@rbf.gov.fj](mailto:info@rbf.gov.fj)  
Website: <https://www.rbf.gov.fj/Contact-Us-Feedback>
- 3.3. Fiji Financial Intelligence Unit:  
Phone: (679) 322 3333  
Email: [info@fijifiu.gov.fj](mailto:info@fijifiu.gov.fj)  
Website: <https://www.fijifiu.gov.fj/Contact-Us.aspx>
- 3.4. Fiji Independent Commission Against Corruption:  
Phone: (679) 331 0290  
Email: [info@ficac.org.fj](mailto:info@ficac.org.fj)  
Website: <https://ficac.org.fj>

## Whistleblower provisions – New Caledonia

New Caledonian law provides for the referral to a Defender of Rights to provide guidance and protection of whistleblowers and apply to private companies of fifty employees or more. Further information is available here:

<https://www.defenseurdesdroits.fr/node/23949>

### 1. QBE reporting channels

- 1.1. Online see link to [Web page](#)

### 2. External reporting channels

- 1.2. <https://www.nouvelle-caledonie.gouv.fr/Services-de-l-Etat/Justice/Defenseur-des-droits>

## Whistleblower provisions – French Polynesia

### 1. QBE reporting channels

- 1.1. Online see link to [Web page](#)



## Whistleblower provisions – Solomon Islands

### 1. Legal Protections

- 1.1. Where there are disclosures received from QBE Solomon Islands employees or the concern relates to an QBE Insurance Solomons Islands operations, the legislative provisions that apply are in the *Whistleblowers Protection Act 2018* (WPA). The WPA provides protection from civil or criminal liability for raising the concern, and protection from disciplinary or other administrative action. It also provides protection from liability for those who cooperate with authorities.

### 2. Criteria for protection as a whistleblower

- 2.1. The WPA applies to public interest disclosures that disclose information that shows engagement of an individual or body in corruption offences, maladministration, or misconduct in public office offences.

### 3. Disclosure

- 3.1. To qualify for protection from criminal and civil liability under the WPA, the discloser must act in good faith, which means that the discloser must believe on reasonable grounds that:
  - the information contained in the disclosure is true; or
  - (where the discloser is not in a position to form a belief about the truth of the information) that the information may be true and is of sufficient significance to justify its disclosure so that its truth may be investigated.

### 4. QBE reporting channels

- 4.1. Online see link to [Web page](#)

### 5. External reporting channels

- 5.1. The appropriate external channel depends on the type of information that is being disclosed and information on how to raise a concern are available at each of the following websites.
  - Solomon Islands Independent Commission Against Corruption
  - The Leadership Code Commission  
<https://solomons.gov.sb/office-of-the-prime-minister-and-cabinet/the-leadership-code-commission/>
  - The Solomon Islands Ombudsman  
<https://www.ombudsman.gov.sb/>

## Whistleblower provisions – Vanuatu

### 1. Criteria for protection as a whistleblower

- 1.1. The *Government Contracts and Tenders Act 2001* provides a mechanism for persons to report concerns on an alleged breach of the tendering process, and a person may make the report under the condition of anonymity. Section 83(1) of the *Right to Information Act 2016* also contains a specific provision for whistleblowers and identifies that a person is not liable for any civil or criminal action or any administrative or employment related sanction or detriment for releasing information on any wrongdoing or a serious threat to health, safety or the environment. Wrongdoing is defined under the Act to include criminal offences and corruption.
- 1.2. QBE is required to comply with certain reporting requirements under the *Anti-Money Laundering and Counter-Terrorism Financing Act 2014* and the *Official Secrets Act 1980*.

### 2. QBE reporting channels

- 2.1. Online see link to [Web page](#)



### **3. External reporting channels**

#### 3.1. Office of the Ombudsman

Email: [ombudsman@vanuatu.gov.vu](mailto:ombudsman@vanuatu.gov.vu)



# Document Governance

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Group Investigations Manager

*This document complies with the Group Governing Document Management Standard*



