

# QBE European Operations (EO) Appendix to the Group Whistleblowing Policy

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## 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.

## 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

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



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 another 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.
- 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.

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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.



## 5. Confidentiality and data privacy

- 5.1. If you raise a concern about Reportable Conduct, you should identify yourself. We will, however, make every effort to keep your identity secret. If it is necessary for anyone other than the Whistleblowing Officers, including those investigating your concern, to know your identity or have access to information from which your identity can be inferred, 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.
- 5.2. By exception, a concern about Reportable Conduct can be raised anonymously, however, this may make it difficult to investigate.
- 5.3. 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.
- 5.4. 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.
- 5.5. 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.
- 5.6. 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://qbееurope.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	Bart DeWulf	<a href="mailto:Bart.Dewulf@be.qbe.com">Bart.Dewulf@be.qbe.com</a>
Compliance Manager, QBE Europe SA/NV Rappresentanza Generale per l'Italia	Marco Cicala	<a href="mailto:Marco.Cicala@it.qbe.com">Marco.Cicala@it.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.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 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 Defenseur 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.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 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 to the Italian Supervisory Board (details below) or to [odv@it.qbe.com](mailto:odv@it.qbe.com) (only members of the Italian Supervisory Board can access this mailbox) or send 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:

<b>Role</b>	<b>Name</b>
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.

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<sup>4</sup> To be established shortly  
**18 Appendix to the Group Whistleblowing Policy**



## 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 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.
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## 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.

