

## **1. Whistleblowing – expressing your concerns**

The Hiscox Whistleblowing policy commits the organisation to ensuring that a person will suffer no retaliation or detrimental treatment as a result of raising a genuine concern about mistreatment or malpractice. This policy ensures that both internal and external stakeholders feel empowered to raise concerns in confidence and without fear of unfair treatment.

### **1.1 Who is eligible to report a concern?**

Whistleblowing occurs when a person makes a disclosure of information about a danger, risk, malpractice or wrongdoing or provides certain types of information, usually about illegal or dishonest practices within an organisation. A whistleblower is a person who raises a genuine issue relating to a whistleblowing concern.

The Whistleblowing policy will apply to all who acquire information on breaches in a work-related context, which includes the persons listed:

- All Hiscox's current and former employees
- Hiscox job applicants or those whose employment contracts have not started
- Officers
- Contractors, subcontractor, its direction members and their employees
- Volunteers, interns or trainees
- Casual workers
- Suppliers and agency workers
- Shareholders and members of the administrative, management or supervisory non-executive bodies.

### **1.2 What can be reported?**

The following is a non-exhaustive list of matters which might be considered as whistleblowing concerns:

- criminal offences
- fraud or misconduct
- financial mismanagement
- health and safety issues
- failure to investigate allegations of harassment or assault by one employee against another
- failure to comply with legal obligations
- bribery, or corruption or financial crime
- failure to comply with regulatory obligations
- failure to comply with internal policies and procedures
- behaviour that is likely to harm the reputation or financial well-being of Hiscox
- the deliberate concealment of the above
- threat for public interest or a legislation violation

## **2. Internal reporting channel and external reporting channel via the Commissariat aux Assurances (CAA) or local country channel**

Whistleblowing concerns may be raised through a number of different internal channels and externally.

### **2.1 Reporting through internal channels**

In order to make our internal channel compliant with the above measures, it will remain available for staff members through the channels described in the Policy and Procedures available on the intranet (*The Gallery*), and it is extended to all eligible persons via:

**Email address:** [whistleblowing@hiscox.com](mailto:whistleblowing@hiscox.com)

**Post to the following address:** 35 Avenue Monterey L-2163 Luxembourg; LUXEMBOURG; attn Roshni Patel

**In person:** Concerns can also be reported in person. If this is your preference, please let us know using one of the above channels.

If you request an in-person meeting, the meeting may, subject to your consent, be documented by (I) recording the conversation in a durable and retrievable form or (II) keeping accurate minutes of the meeting prepared by members who are responsible for handling your report. We also offer you the opportunity to check, correct and approve the minutes of the meeting by signing them.

Reporting can be done anonymously if preferred, and every effort will be made to preserve the confidentiality of the whistleblower. The identity of the whistleblower or any third parties involved will only be disclosed in circumstances where this becomes unavoidable by law (for example due to the obligation of Hiscox to inform the authorities if the facts are likely to constitute a crime or misdemeanour).

### ***Measures against retaliation and confidentiality***

Hiscox will not permit any retaliation or harassment against a whistleblower or any connected person who assists in an investigation due to their involvement in a report and/or investigation. This also applies in cases where an investigation does not confirm the allegations made.

Your information will be treated confidentially. This confidentiality also applies to all other information from which the identity of the reporter can be directly or indirectly derived. We take appropriate measures to handle all information received carefully and to safeguard the interests of all those involved. All data provided will be processed in accordance with applicable data protection regulations and our privacy statement. For more information about our privacy statement please revert to our website: <https://www.hiscox.lu/privacy-policy>

### ***Follow-up***

When you submit a report, you will receive confirmation of receipt within seven days.

We encourage you to provide us with a contact detail (like your name and/or an email address) when submitting a report. This way we can contact you for any follow-up questions. However, if you prefer to remain anonymous, we will respect your decision and your case will still be investigated.

Feedback will be provided within a reasonable timeframe which shall not exceed three months from the acknowledgement of receipt.

## **2.2 Reporting through external channel**

Whistleblowing alerts may be reported independently to the Commissariat aux Assurances (CAA) for any breaches to the applicable Luxembourg laws and regulations.

Detailed instructions on how to report can be found on the CAA website via the following link:  
*<https://www.caa.lu/fr/whistleblowing>*.

External channels are also available through the relevant regulators within the other European countries in which HSA operates.

It is recommended that all eligible reporting person to first use our internal alert procedure via the channels described above before contacting the CAA for external report.