

Whistleblowing Hotline Frequently Asked Questions (FAQs)

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1. Introduction

Swiss Re is committed to acting with honesty, transparency, fairness integrity and personal accountability. We encourage you to report any incidents if you suspect that someone inside, or connected with, Swiss Re is acting in a manner that could constitute misconduct.

We understand that it is not always easy to report your concerns in person. Swiss Re has therefore made this Whistleblowing Hotline available.

This FAQ document anticipates some of the questions you may have if you wish to report suspected misconduct using the Whistleblowing Hotline. Before making a report make sure you consult the [Global Standard on Whistleblowing](#)¹. For a more detailed step by step guide on how to make a report, please refer to the [Whistleblowing Hotline Quick Reference Guide](#)².

2. About EthicsPoint

2.1. Why does Swiss Re need a reporting tool like EthicsPoint?

Transparent communication is critical in today's workplace and the Whistleblowing Hotline is a key tool in providing a reporting channel where a reporter prefers not to use standard channels.

The Whistleblowing Hotline, EthicsPoint, is a simple, confidential and secure reporting tool operated by Navex, an independent external company specialized in providing whistleblowing services throughout the world. It is available in several languages 24 hours a day, 365 days a year.

3. Reporting – General

3.1. Can I report using either the phone or the website?

Yes, the Whistleblowing Hotline gives you the ability to file a confidential report either orally via the phone or in writing via the online form. Please use whichever method you feel most comfortable with. For more information on how to make a report, please see the [Whistleblowing Hotline Quick Reference Guide](#)³.

3.2. Can the Whistleblowing Hotline be used by anyone?

The Whistleblowing Hotline is available to anyone, including third parties, engaged in a working relationship with Swiss Re and who wants to make a report in relation to Swiss Re.

3.3. What kinds of misconduct should I report?

We encourage you to report any suspected illegal or improper act (which we define as misconduct), whether it relates to managers, employees, clients, suppliers, contractors, or other stakeholders connected with Swiss Re.

The following is a non-exhaustive list of examples of misconduct that should be reported:

- an apparent breach of the Swiss Re Code of Conduct;
- misrepresentation in the handling or reporting of money or financial transactions;

¹ <https://swissre.sharepoint.com/sites/policymanagement/PMTPublishedDocuments/9/G00060.pdf>

² <https://secure.ethicspoint.com/domain/media/en/gui/35747/guide.pdf>

³ <https://secure.ethicspoint.com/domain/media/en/gui/35747/guide.pdf>

- theft of company property;
- fraudulently claiming for expenses that have not been incurred whilst on company business;
- misappropriation of funds;
- destruction, removal, or concealment of intellectual property;
- forgery, falsification, or alteration of documents;
- authorising or receiving payment for goods not received or services not performed;
- accepting or offering bribes, kickbacks, or rebates;
- mis-reporting for financial gain or other purpose, such as reporting false information for bonus or performance purposes;
- lack of reporting of actual incidents or breaches;
- discrimination and harassment of any kind regardless of age, race, ethnicity, nationality, gender (including gender identity and expression), religion, sexual orientation, disability as well as any other class protected by law;
- health and safety concerns, which have been reported but not addressed; and / or
- actions related to concealing or perpetuating any of the above.

3.4. Can I report any type of misconduct regardless of my location and the location where it took place?

Regulatory requirements in some jurisdictions may restrict the types of misconduct that can be reported. If your location is under such restrictions, you will be notified of these when making your report.

3.5. Is the Whistleblowing Hotline the only available channel to make a report?

No, Swiss Re has made a number of other channels available so that you can report actual or suspected misconduct. Please refer to [Reporting Misconduct \(Whistleblowing\) at Swiss Re⁴](#) for information.

There is no preferred reporting channel. Please make your report using the channel that you feel most comfortable with.

3.6. Why should I report what I know, even if it does not affect me?

We encourage you to report situations where you suspect misconduct may have occurred. Misconduct is wrong, is inconsistent with the stated values of Swiss Re and could expose the company and its employees to financial, legal and reputational damage, thereby harming us all. You should still make a report even where you are not sure if you have sufficient proof as any information is relevant. Eg, reports from multiple witnesses can be significant where there is otherwise a lack of evidence.

3.7. Does Swiss Re management really want me to report?

Yes. Integrity is one of our core values that we live by. If you have knowledge of an activity that may be cause for concern we want to know about it so we can address and resolve it.

⁴ <https://www.swissre.com/about-us/our-approach/compliance/reporting-misconduct-whistleblowing-at-swiss-re.html?r>

3.8. I am not sure if what I have observed or heard constitutes misconduct, but it just does not look right to me. What should I do?

If you have any doubts or concerns, you should always make a report. Swiss Re would rather you report a situation that turns out to be harmless than let possible unethical behaviour go unchecked.

If you decide to use the Whistleblowing Hotline, EthicsPoint will help you prepare and file your report so that it can be properly understood.

3.9. Is the Whistleblowing Hotline compliant with the EU Whistleblower Directive?

The Whistleblowing Hotline has been updated by Navex to ensure that it is compliance with the Directive`s requirements. For further information see [Navex`s Solutions Guide⁵](#).

4. Reporting - Security and Confidentiality

4.1. Can I make an anonymous report either by phone or using the website?

Yes, the EthicsPoint reporting tool is designed to protect your anonymity if you choose to remain anonymous. However, if you do wish to remain anonymous, you – as the reporting party – need to ensure that the body of the report does not reveal your identity by accident. For example, avoid providing details such as 'From my desk next to Jan Smith' or 'My line manager in XYZ team' (with only one direct report). Please note that some locations *may* have limitations, however, you will be informed if there any legal prohibitions associated with the applicable location when you make a report.

Swiss Re prefers that employees identify themselves so that Swiss Re can obtain all relevant facts and properly investigate the allegations as soon as possible.

4.2. Is a report made by phone as confidential as one made using the website?

Yes. Both types of reports have the same security and confidentiality measures applied to them during data capture, storage and communication to Swiss Re.

4.3. Where do these reports go? Who can access them?

Reports made via the Whistleblowing Hotline are entered directly on to the EthicsPoint secure server. EthicsPoint makes these reports available only to specific individuals within Swiss Re who are responsible for evaluating and investigating the reports, based on the type and location of the misconduct. Each of these report recipients has been made aware of their responsibility to preserve the confidentiality to the fullest extent possible.

4.4. It is my understanding that any report I send from a company computer generates a server log that shows every website that my computer connects with - won't this identify me as a report originator?

Swiss Re does not use server log information to determine an individual employee's Internet surfing behaviour on Swiss Re workstations. In addition, EthicsPoint does not generate or

⁵ https://cdn.navex.com/image/upload/v1644436694/resource%20documents/solution-guide-eu-whistleblower-directive-2022.pdf?_gl=1*_rdn57j*_ga*MjA5MjY1OTEwOC4xNjU0NTk0Mjg4*_ga_JRYF9MG532*MTY2Nzk4NTMwMi4xNS4xLjE2Njc5ODUzMTQuMC4wLjA.

maintain any internal connection logs with IP addresses and does not keep any information linking your computer to EthicsPoint. In fact, the vendor running EthicsPoint is contractually committed not to pursue a reporter's identity.

4.5. Do I need to use a Swiss Re computer to access the Whistleblowing Hotline website?

You can use any computer to connect to the EthicsPoint secure website and it does not have to be a Swiss Re issued computer. Use the following public URL to open the Whistleblowing Hotline: www.swissre.ethicspoint.com.

5. Tips and Best Practices

5.1. What if I remember something important about the misconduct after I file the report, or Swiss Re has further questions for me concerning the report?

When you file a report through the Whistleblowing Hotline (whether by phone or online form), you will receive a unique report key and are asked to choose a password. You can return to the Whistleblowing Hotline again either by phone or using the website and access the original report to add more detail or answer questions posed by a Swiss Re representative. It is strongly recommended that you return after five business days to the Whistleblowing Hotline and then check periodically to see if there are any additional questions to answer. Please note, however, that if you choose to reveal your identity, Swiss Re may contact you directly instead of using the Whistleblowing Hotline to speed up the process and investigation of the case.

5.2. Are follow-up reports as secure as the first one?

All Whistleblowing Hotline correspondences are held in the same strict confidence as the initial report, including direct communications between you and the investigator.

5.3. What should I do if I lose my report key or password?

Because of the high level of confidentiality that is maintained for reports, if you lose your report key or password, you will be required to file a new report. You can mention in the new report that this matter relates to another report you supplied earlier.

6. Investigation and Retaliation

6.1. How will my report be investigated?

Please refer to [Reporting Misconduct \(Whistleblowing\) at Swiss Re⁶](#) for information on how Swiss Re handles the investigation of reports.

6.2. What if I face retaliation?

Swiss Re explicitly prohibits any form of actual, threatened or attempted retaliatory action against anyone who, in good faith, either reports suspected misconduct, or assists with investigations arising from reported misconduct. Any substantiated breach of this prohibition on retaliation will result in disciplinary and potentially legal action.

If you believe that you have been subjected to retaliatory action, contact the Investigation Coordination Process by e-mailing: Incident_Coordination@swissre.com.

⁶ <https://www.swissre.com/about-us/our-approach/compliance/reporting-misconduct-whistleblowing-at-swiss-re.html?r>

7. Further Information

7.1. I have a different question. Where can I go to find the answer?

For more information about the Whistleblowing Hotline in particular, or the reporting misconduct in general, please contact your local Compliance Officer (see [MyCompliance⁷](#)). If you have a question in relation to an ongoing report that you made using the Whistleblowing Hotline, please contact Investigation Coordination Process by e-mailing: Incident_Coordination@swissre.com.

⁷ <https://mycompliance.at.swissre.com/>