

SWISS RE WHISTLEBLOWING HOTLINE

QUICK REFERENCE GUIDE

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1. INTRODUCTION

Swiss Re is committed to acting with honesty, transparency, fairness 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.

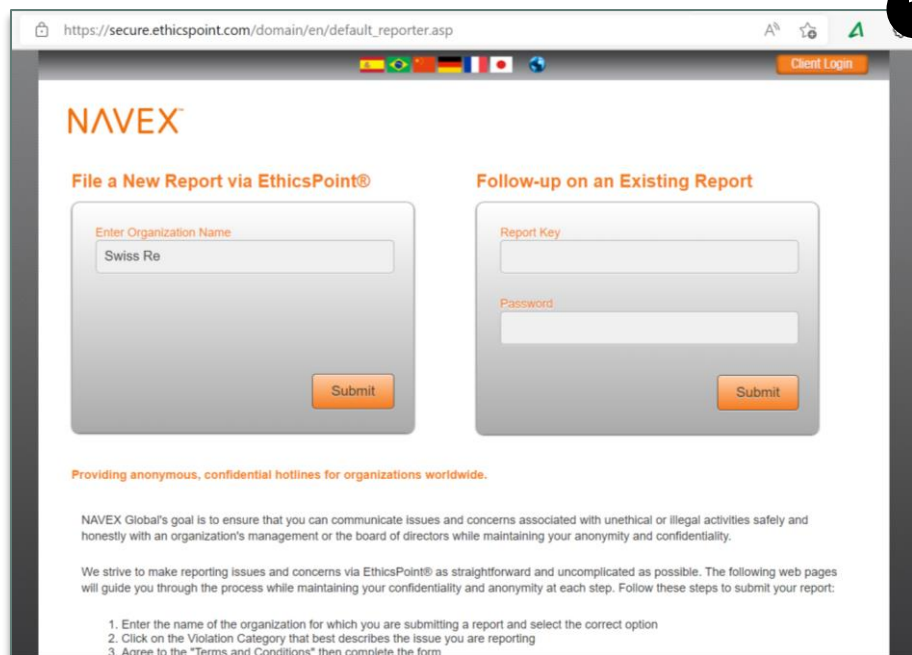
Swiss Re has made a [Whistleblowing Hotline](#) available and this Quick Reference Guide explains how to use the Whistleblowing Hotline report suspected or actual misconduct.

2. ACCESSING THE SWISS RE WHISTLEBLOWING HOTLINE

There are several ways to access the Whistleblowing Hotline. These different options are available to make it easy to find the reporting tool, whether you want to report at work or outside Swiss Re:

2.1. Go to swissre.ethicspoint.com.

2.2. If you are ever unsure of the proper URL to use for reporting, you can go to <http://www.ethicspoint.com/>. Once there, in the File a New Report via EthicsPoint area in the upper left-hand corner of the screen type in "Swiss Re" and click Submit. Select "Swiss Re" from the top of the search results and then click on the Select Company/Institution button.



https://secure.ethicspoint.com/domain/en/default_reporter.asp

NAVEX

File a New Report via EthicsPoint®

Enter Organization Name
Swiss Re

Submit

Follow-up on an Existing Report

Report Key

Password

Submit

Client Login

Providing anonymous, confidential hotlines for organizations worldwide.

NAVEX Global's goal is to ensure that you can communicate issues and concerns associated with unethical or illegal activities safely and honestly with an organization's management or the board of directors while maintaining your anonymity and confidentiality.

We strive to make reporting issues and concerns via EthicsPoint® as straightforward and uncomplicated as possible. The following web pages will guide you through the process while maintaining your confidentiality and anonymity at each step. Follow these steps to submit your report:

1. Enter the name of the organization for which you are submitting a report and select the correct option
2. Click on the Violation Category that best describes the issue you are reporting
3. Agree to the "Terms and Conditions" then complete the form

ethics.point

You are now in an EthicsPoint Secure Area | [File a Report](#)

2

There are too many matches for your search. Please be more specific with the name.

The following matches were found for 'Swiss Re' in our database. Please select the correct company or institution:
We found the following companies or institutions:

- ☒ Swiss Re
- ☐ Swiss Premium Dairy, LLC (Dean Foods Company)
- ☐ 10th Street YMCA (YMCA of Greater Richmond)
- ☐ 1810 Corporation (Delaware)
- ☐ 33rd Street Lab
- ☐ 360 Federal Credit Union
- ☐ 800 Degrees
- ☐ 8th Street YMCA
- ☐ 99 Cents Only Stores
- ☐ a EIM Tier1 RETAIL ú
- ☐ A.E. Finley YMCA (YMCA of the Triangle Area)
- ☐ AAP Stores - Reg 20 - VPO 418
- ☐ Aberdeen Proving Grounds Federal Credit Union
- ☐ ABIM UK and Ireland
- ☐ Above & Beyond Tools and Services for Entrepreneurs, Inc.
- ☐ Abri Health Care Services
- ☐ ABS (American Bureau of Shipping (ABS))
- ☐ AC Moore (LP Innovations, Inc.)
- ☐ Acadia Healthcare Company, Inc.
- ☐ AccentCare, Inc.
- ☐ Access Information Management Shared Services, LLC
- ☐ Acclarent (Johnson & Johnson)
- ☐ ACCO Engineered Systems
- ☐ Accountable Healthcare Staffing
- ☐ Accredo (Cigna)
- ☐ Accretive Health (R1 RCM Inc.)
- ☐ ACE Cash Express, Inc.
- ☐ Ace Hardware Corporation
- ☐ Acme Brick Company (Berkshire Hathaway Inc.)
- ☐ Acrisure

2.3. A link is available on the publicly accessible page on www.swissre.com: [Reporting Misconduct \(Whistleblowing\) at Swiss Re](#).

3. NAVIGATING THE MAIN PAGE OF THE WHISTLEBLOWING HOTLINE

3.1. The Whistleblowing Hotline is available in six different languages. Click on your preferred language at the very top right-hand corner of the main page.

English | Deutsch | Français | Italiano | Español | Português

3.2. There are three options at the top of the main page:

Follow-up on a Report | Swiss Re's Group Code of Conduct | Quick Reference Guide

3.3. For more information about **Follow-up on a Report**, see section 0 of this Quick Reference Guide.

3.4. Select **Swiss Re's Group Code of Conduct** to view the latest version of our Code of Conduct.

3.5. The **Quick Reference Guide** link takes you to a PDF of this guide.

3.6. The **To Make a Report** section, is where you to start the process of making a report

TO MAKE A REPORT

Select your location.

- Select - ▼

3.7. There are three links at the bottom right-hand corner of the main page which set out information regarding Navex's **Privacy Statement**, **Acceptable Use Policy**, **Cookie Statement** and **Contact information**.

Privacy Statement | Acceptable Use Policy | Cookie Statement | Contact EthicsPoint

4. MAKING A REPORT BY PHONE

- 4.1. To make an oral report, navigate to the To Make a Report section. Please select the relevant location first, after which the options and applicable phone numbers will be displayed. Generally, all calls to the Whistleblowing Hotline are free of charge, however, in some circumstances international roaming charges, or mobile network costs apply.
- 4.2. The steps for making a report by phone will depend on the local network and whether it is a toll-free, a reverse charge or a collect call number.
- 4.3. When you dial the appropriate number, you will hear an automated greeting. The greeting will provide an opportunity to proceed in another language, where supported, as well as instructions and what options you may select. The EthicsPoint Contact Centre provides approximately 200 languages. If you would like to report in a language other than those available for your location, the operator answering your call will arrange for the appropriate interpreter. In such cases, there may be a delay whilst an available interpreter is found.
- 4.4. If you encounter difficulty using a number provided, please try again using your location or country access code (eg, +41 for calls from Switzerland), followed by the number without the first "0". If for any reason you are still unable to connect, please try dialing from a landline, submit your report in writing via the Online form (see Section [5](#)), or use one of the other available [reporting channels](#). In this case, please include details about any connectivity issues within your report. Please note in some instances, there may be one to three minutes of silence while you are connected. International telephony systems slow down the process to connect you to the appropriate staff to service your call.
- 4.5. Once connected, the operator who answers the call will guide you through the process, pointing out any restrictions for your location, collecting the details on your concern and helping you prepare and file a report that can be properly understood and investigated by Swiss Re.
- 4.6. Please note that the operator must read a brief notice regarding data protection and privacy. Your consent to that notice is mandatory before you may proceed.
- 4.7. After completing the report, the operator will inform you of important next steps and explain how to use your unique password and Report Key to access the original report to add more details or check for comments or questions from Swiss Re, as described in the **Follow-up on a Report** in section O of this Quick Reference Guide.

TO MAKE A REPORT

Select your location.
Switzerland ▼

ONLINE

Select the location where the suspected misconduct took place.
- Select - ▼

BY PHONE

International Toll-Free Service (ITFS)

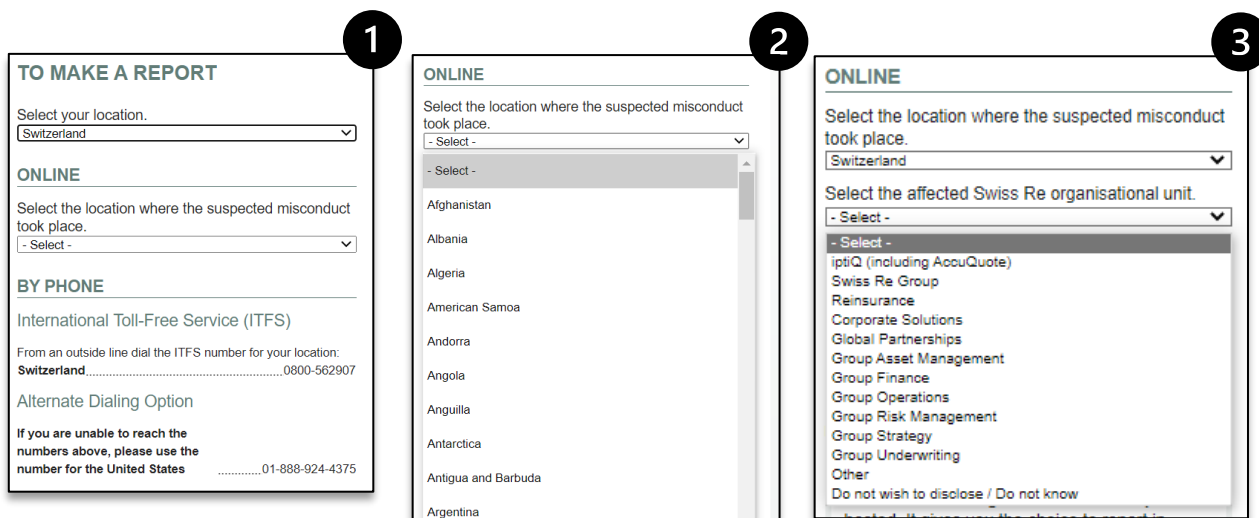
From an outside line dial the ITFS number for your location:
Switzerland 0800-562907

Alternate Dialing Option

If you are unable to reach the numbers above, please use the number for the United States 01-888-924-4375

5. MAKING A REPORT ONLINE

- 5.1. To make a report online, navigate to the **TO MAKE A REPORT** section and select your location.
- 5.2. Under the **ONLINE** section select the location where the suspected misconduct took place.
- 5.3. Please note that regulatory requirements in some jurisdictions may restrict the types of misconduct that can be reported via the Whistleblowing Hotline. If your location is not listed, please contact the Investigation Coordination Process: Incident_Coordination@swissre.com.
- 5.4. You will then select the affected Organisational unit. Depending on the circumstances, this may be the Organisational unit where the misconduct occurred or the Organisational unit that could be most impacted by what happened. If you are not comfortable identifying the organizational unit or are not sure, you have the option of selecting **Other** or **Do not wish to disclose / Do not know**. If multiple organisational units are affected, you can select Other or Swiss Re Group.



1 **TO MAKE A REPORT**

Select your location.
 [Switzerland]

ONLINE

Select the location where the suspected misconduct took place.
 [- Select -]

BY PHONE

International Toll-Free Service (ITFS)

From an outside line dial the ITFS number for your location:
 Switzerland 0800-562907

Alternate Dialing Option

If you are unable to reach the numbers above, please use the number for the United States 01-888-924-4375

2 **ONLINE**

Select the location where the suspected misconduct took place.
 [- Select -]

Alghanistan
 Albania
 Algeria
 American Samoa
 Andorra
 Angola
 Anguilla
 Antarctica
 Antigua and Barbuda
 Argentina

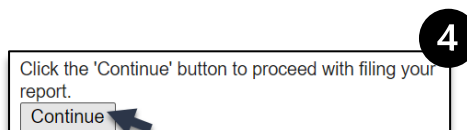
3 **ONLINE**

Select the location where the suspected misconduct took place.
 [Switzerland]

Select the affected Swiss Re organisational unit.
 [- Select -]

iptiQ (including AccuQuote)
 Swiss Re Group
 Reinsurance
 Corporate Solutions
 Global Partnerships
 Group Asset Management
 Group Finance
 Group Operations
 Group Risk Management
 Group Strategy
 Group Underwriting
 Other
 Do not wish to disclose / Do not know

- 5.5. Click **Continue**.



Click the 'Continue' button to proceed with filing your report.

Continue

- 5.6. You will need to read the **Swiss Re Data Protection and Privacy Notice**. This notice details what personal data and information will be collected and processed, as well as who may access that personal data and information once collected. You are required to provide your consent by ticking the checkbox and then selecting **Continue**. The message you see on the website is only a disclaimer and you must click the link to access the Swiss Re Data Protection and Privacy Notice and review it carefully.

☒ I have read the [Swiss Re Data Protection and Privacy Notice](#) and consent to the processing of my personal data and information as described therein.

[Continue](#)

[Cancel](#)

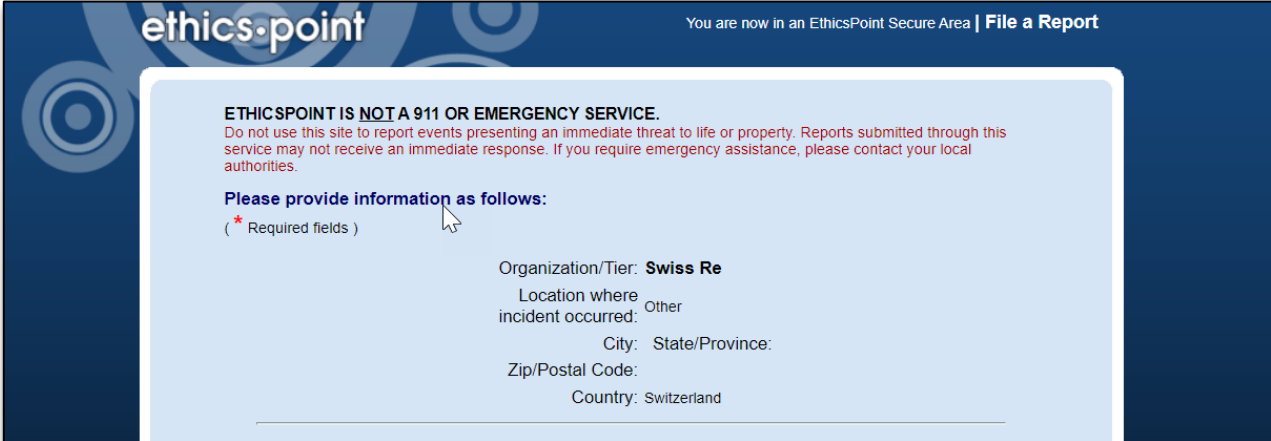
5.7. If you do not provide your consent, you will not be able to continue. If you click **Cancel**, you will return to the Whistleblowing Hotline main page.

5.8. In the next screen, select the type of report that best describes the suspected misconduct you seek to report. For each type of report, you can click Details to view a short description. To continue, select the type of report you wish to make by clicking on it.

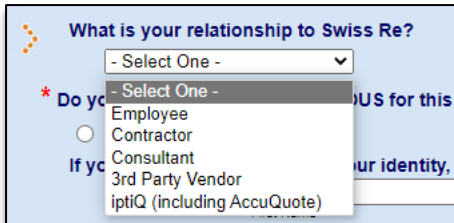
Click on the type of report you would like to make. Click on 'Details' for a full description.

Moral Behaviour	BRIBERY & CORRUPTION	DETAILS
	CONFLICTS OF INTEREST	DETAILS
	CULTURE OF INTEGRITY / BUSINESS ETHICS	DETAILS
	DISCRIMINATION AND HARASSMENT	DETAILS
	FRAUD OR OTHER MISAPPROPRIATION OF ASSETS	DETAILS
	SAFETY AND HEALTH	DETAILS
Company Business Records and Communication	ACCOUNTING, AUDITING AND INTERNAL FINANCIAL CONTROLS	DETAILS
	COMMUNICATION OUTSIDE OF THE ORGANISATION	DETAILS
	DATA PROTECTION	DETAILS
	DOCUMENT MANAGEMENT	DETAILS
Market Practice	COMPETITION LAW	DETAILS
	CONSUMER RIGHTS (E.G. ON 'TREATING CUSTOMERS FAIRLY' REQUIREMENTS)	DETAILS
	INTERNATIONAL TRADE CONTROLS AND ECONOMIC SANCTIONS	DETAILS
	MARKET CONDUCT	DETAILS
	MONEY LAUNDERING	DETAILS
	THIRD PARTY VENDOR MANAGEMENT	DETAILS
Information Integrity	CONFIDENTIAL BUSINESS INFORMATION	DETAILS
	INSIDER TRADING	DETAILS
	INTELLECTUAL PROPERTY	DETAILS
	OTHER	

5.9. You will then find yourself on a page with a different graphical interface as you are now in the EthicsPoint secure area. This page has a list of questions designed to collect details on the suspected misconduct you wish to report. All the information you provide will be handled confidentially, as described in the Swiss Re [Global Standard on Whistleblowing](#). Swiss Re will use the information you provide to investigate the report, so please take the time to provide as much detail as possible. Note that fields marked with a red asterisk are mandatory. It is not possible to submit the report without completing them.

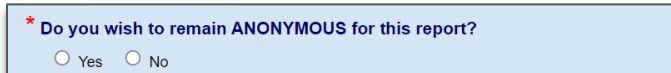


A. What is your relationship to Swiss Re?



Select the value from the dropdown that best describe your relationship to the organization.

B. Do you wish to remain ANONYMOUS for this report?



Indicate if you would like to remain anonymous or if you want to provide contact information so that Swiss Re may follow-up directly with you about the report.

Please note that if you report anonymously, the only way Swiss Re will be able to contact you is through the **Follow-Up on a Report** feature. Swiss Re prefers that reporters identify themselves so that Swiss Re can obtain all relevant facts and properly investigate allegations as soon as possible. If you identify yourself, Compliance will contact you directly to follow-up on your report.

C. If you want Swiss Re to know your identity, please complete the following:

If you want Swiss Re to know your identity, please complete the following:

Your Name:
First Name Last Name

Your Phone Number:

Your E-mail Address:

Best time for communication with you:

If you are identifying yourself, please provide the necessary details so that Swiss Re may contact you about your report, including your name, phone number, email address and the best time to reach you in the respective fields.

D. What is the nature of the suspected misconduct?

What is the nature of the suspected misconduct?

This should be a general description only, you will be asked for specifics later.

Provide a brief description of your report or summarise the general nature of your concern – one or two sentences is sufficient. You will have the opportunity to provide details further down in the form.

E. Please identify the person(s) engaged in the suspected misconduct:

***Please identify the person(s) engaged in the suspected misconduct:**

Example:

John Doe, Head of Internal Audit
 Unknown, Unknown, Shift Supervisor

	First Name	Last Name	Title
#1	<input type="text"/>	<input type="text"/>	<input type="text"/>
#2	<input type="text"/>	<input type="text"/>	<input type="text"/>
#3	<input type="text"/>	<input type="text"/>	<input type="text"/>

If more than three individuals, please use the case details field further down in this form to identify them.

Provide any details you may have about individuals you believe are involved in the suspected misconduct. This section provides fields to identify up to three individuals. If there are more individuals you wish to identify, you can provide their details further down in the form. If you do not know the exact first name, last name and title, enter what you do know. For any field you do not know, enter **Do not know** or **Unknown**.

F. If you have already raised this concern within SwissRe, please indicate to whom and when:

If you have already raised this concern within Swiss Re, please indicate to whom and when:

Your response to this question will assist the investigator when deciding who to contact through the course of the investigation.

G. Where did this suspected misconduct occur?

Where did this suspected misconduct occur?

For example, if this case took place in a particular location, or was observed in specific documentation or business transactions, please indicate this accordingly.

Identify where the misconduct occurred. As the example indicates, the answer here may vary depending on the situation. Please give an as accurate as possible description.

H. Please provide the specific or approximate time this case occurred:

Please provide the specific or approximate time this case occurred:

Examples:

Tuesday, 3 May 2012

Two weeks ago

Approximately a month ago

Provide what details you may have about when the suspected misconduct occurred.

I. How long do you think this has been going on?

How long do you think this has been going on?

- Select One -

How long do you think this has been going on?

- Select One -

Happened once

One week

1 to 3 months

3 months to a year

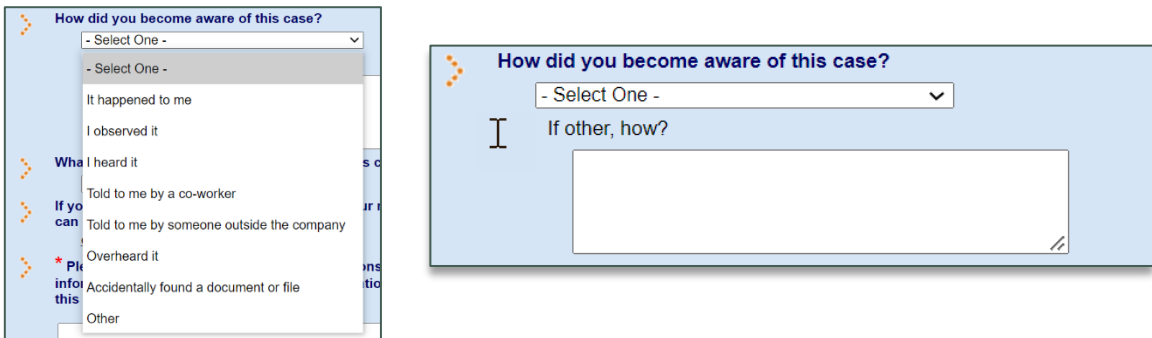
More than a year

Don't know

Select the value that most closely describes how long you think this has been going on. If you are not sure, you can select don't know.

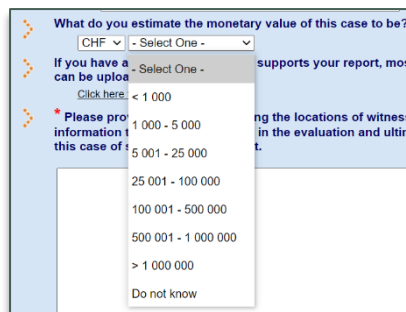
10

J. How did you become aware of this case?



Select the value that most closely identifies how you found out about the suspected misconduct. If none of the options applies, select other and enter more details in the field provided.

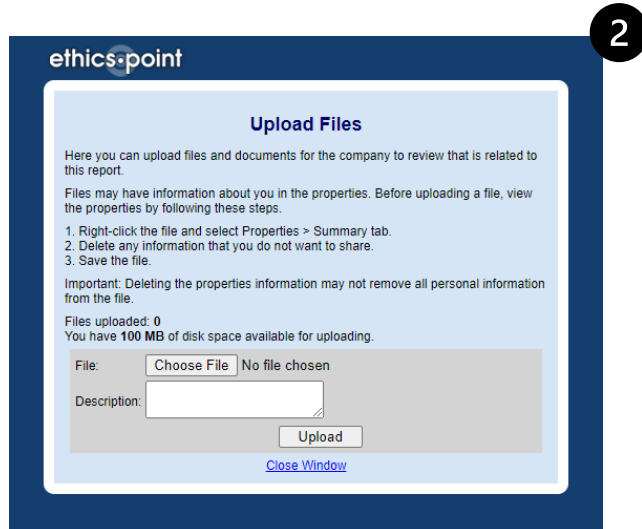
K. What do you estimate the monetary value of this case to be?



This may be difficult depending on the nature of the suspected misconduct and how much information you have about it. To answer, pick the currency and the range that covers the amount you estimate for what you are reporting. This is not a mandatory question.

L. If you have a document or file that supports your report, most common file types can be uploaded:






Here you can attach any documents relevant to your report. To attach a document, click the link to upload files. In the pop-up window, click **Choose File** and then locate the document. Once you have selected the document, you can provide a description about what you are attaching - describe how the document supports your report or indicate details useful for the case investigators. To finish uploading the document, click **Upload**. You can upload more than one document. There is a limit of 10 MB for all of the files you upload. If you have a large document or multiple files that exceed the 10 MB limit, please make a note of this in the next section. If you identified yourself above, Swiss Re may contact you to obtain the remaining documents. Click **Close Window** when you are finished adding documents. Even though the documents you have attached are not listed on the screen, they have been uploaded.

Please also be careful to remove any personally identifiable information from the file if you have chosen to remain anonymous.

M. Please provide all details including the locations of witnesses and any other information that could be valuable in the evaluation and ultimate resolution of this case of suspected misconduct.

 *** Please provide all details including the locations of witnesses and any other information that could be valuable in the evaluation and ultimate resolution of this case of suspected misconduct.**


Please take your time and provide as much detail as possible, but exercise care to not provide details that may reveal your identity unless you wish to do so. It may be important to know if you are the only person aware of this situation. Please restrict yourself to providing facts as you know them. Please avoid including opinions, speculation or unfounded conclusions.

When you submit the report, you will be issued a Report Key. Please write it down and keep it in a safe place. We ask you to use this Report Key along with the password of your choosing to return to EthicsPoint through the website or telephone hotline in 5 business days. You will not be able to change the content of your report after submitting it, however, by returning to the report, you will have the opportunity to review any feedback or follow-up questions, or submit more information about this case.

In this required field, provide detailed information on the suspected misconduct. Give any information you believe is relevant or may be helpful to investigate this report. This could include locations of witnesses or additional individuals involved in the misconduct. This is one of the most important fields of the report so take your time to fill it in.

If you are filing the report anonymously, avoid details that would identify yourself. Focus on the facts - what you know happened. Opinions, speculating about the suspected misconduct or drawing conclusions typically will not support the ultimate resolution of the case.

N. Create a password

 **Please choose a password for this report:**

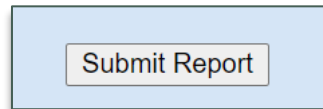
*** Password:**

*** Re-enter Password:**

Your passwords must match and be at least four characters long.

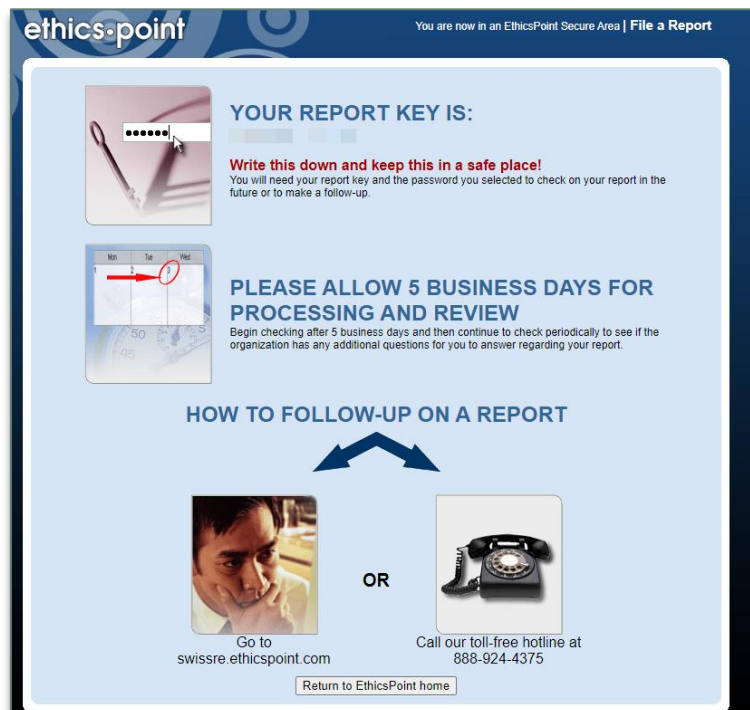
Finally, create a password for this report. This password is very important. You will need it along with the Report Key, to revisit and follow-up on the report. Use a password that you will easily remember.

O. To finish, click Submit Report.



If you failed to answer any required fields, the page will prompt you to complete them. Review the comments at the top of the page and look for fields highlighted in red. As confirmation that you successfully submitted the report, the following page will provide you the Report Key for the report you just submitted. Write this number down and keep it in a safe place.

P. Report Key



As confirmation that you successfully submitted the report, the following page will provide you the Report Key for the report you just submitted. Write this number down and keep it in a safe place.

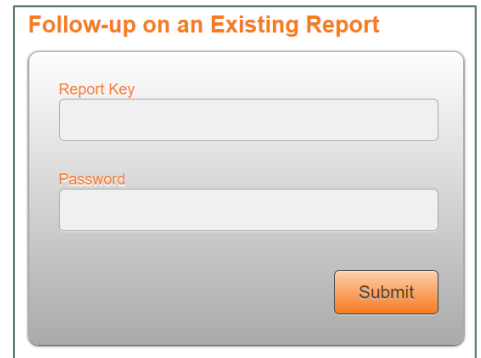
6. FOLLOWING UP ON A REPORT

- 6.1. You may follow-up on a report by visiting www.ethicspoint.com or calling the number for your location (available by selecting your location under the **To Make a Report** section on the main page).
- 6.2. To follow-up by phone, please refer to the **Making a Report by Phone** section above to obtain the proper phone number to call for your location. When you are connected to an operator, provide your Report Key and password. You will then be able to add information to the original report or enquire on comments or questions from Swiss Re.
- 6.3. To follow-up online:

Select **Follow Up on a Report** in the upper left-hand corner of the EthicsPoint homepage. You can also direct your browser to swissre.ethicspoint.com.





Type in your Report Key and the password you selected when you submitted the report. Click Submit.



If you have forgotten the Report Key or the password, there is no process to recover them; neither Swiss Re nor EthicsPoint have access to these. 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.

Once you successfully login to the follow-up system, the initial view will provide you several options. If a comment or question has been posted by Swiss Re, you will see that right away on the main portion of the screen. From this screen, you may also:

- **Add Follow-Up Notes:** provide more information about the report you submitted.
- **Upload Files:** attach documents that support your report.
- **Report Details:** review the details of the report you submitted.
- **Print My Report:** print a copy of the report you submitted.
- **Join a Chat:** chat with Swiss Re via an online chat feature.

<div>   </div>	ISSUE TYPE: INSIDER TRADING
<ul style="list-style-type: none"> Questions and Comments Add Follow-Up Notes Upload Files Report Details Print My Report Log Off 	<p>QUESTIONS AND COMMENTS</p> <p>The organization does not have any questions or comments at this time.</p>

You and Swiss Re can request an online chat and arrange a specific time to meet. At the designated time, you will need to log in using your Report Key and password, as demonstrated in one above, to participate. An online chat may be helpful if an anonymous reporter wishes to provide more information by means of a conversation or if Swiss Re has a number of questions to ask and it would be easier to review those questions at the same time. The chat is transcribed and added as part of the case file. Be mindful of any information you share; you will not be able to edit it.

At the end of this process you will need to select **Log Off** in order to log out of the follow-up system.

Please remember that if you identified yourself in the original report Swiss Re will follow-up with you directly, rather than via the Whistleblowing Hotline.