

Our Commitment

At QBE we aspire to be a company with a strong ethical culture, where we behave with integrity, are honest and do the right thing.

Our Code of Ethics and Conduct sets expected minimum standards of behaviour. It reflects our changing business environment as well as emerging regulatory and compliance requirements. QBE is committed to an environment that gives priority to employee rights and fair procedures, promotes tolerance, compassion and loyalty and where open, honest communications are the expectation, not the exception.

We understand it's not always easy to speak up and report conduct or activity you believe is wrong, but QBE is committed to providing an open, safe and transparent environment where employees who do choose to speak up are supported. We want you to feel comfortable in approaching your manager or senior management in instances where you have genuine concerns about any conduct or activity.

In situations where you prefer to place an anonymous report about such matters, you are encouraged to use QBE's hotline hosted by a third party hotline provider, EthicsPoint. You can also use this hotline to request guidance from QBE on ethical dilemmas, as well as providing positive suggestions and stories. Such requests for guidance will be made available only to specific individuals within QBE who are charged with evaluating the information and providing a response to you.

The information you provide and any guidance you may be seeking will be sent to us by EthicsPoint on a totally confidential and if you have chosen it, anonymous basis. You have our guarantee that your report will be heard, assessed and (if required) investigated and if the concerns are found to be valid, appropriate corrective action will be taken.

See the EthicsPoint FAQs for more information.

EthicsPoint is NOT an Emergency Service:

Do not use this site to report events presenting an immediate threat to life or property. Reports submitted through this service may not receive an immediate response. If you require emergency assistance, please contact your local authorities.

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About EthicsPoint

What is EthicsPoint?

EthicsPoint is a comprehensive and confidential reporting tool created by NAVEX Global to assist QBE employees in reporting potential or actual misconduct in the workplace, all the while cultivating a positive work environment.

Why do we need a system like EthicsPoint?

- We believe that our employees are our most important asset. By creating open channels of communication, we can promote a positive work environment and maximise productivity.
- Publicly traded companies are required by laws in some jurisdictions to have an anonymous reporting vehicle to address accounting and auditing fraud.
- An effective reporting system will augment our other efforts to foster a culture of integrity and ethical decision-making.

Reporting – General

May I report using either the Internet or the telephone?

Yes. With EthicsPoint, you have the ability to raise a concern confidentially via either the telephone or the Internet. If you wish to remain anonymous, with EthicsPoint, you can do so.

What type of situations should I report?

The EthicsPoint system is designed for employees to disclose information about conduct or activity where they have a genuine concern or reasonable belief the activity or conduct may or is:

- A breach of QBE Policies, including the Code of Business Ethics and Conduct; or
- Unethical or illegal misconduct, or
- Represents a danger in the workplace; or
- A breach of QBE's accounting, internal control, compliance, and/or audit processes.

If I have a concern to report, shouldn't I just report it to my manager and let them deal with it?

A number of avenues are available for employees to report conduct or activities. Employees can report their concerns to their line manager, compliance, human resources or those individuals responsible for whistleblowing matters as set out in the Group or local Whistleblowing Policies and/or Guidelines. We recognise, however, that there may be circumstances when you are not comfortable reporting internally. It is for such circumstances that we have partnered with EthicsPoint. We would rather you report anonymously than keep the information to yourself. Deliberate or wilful failure to report or to refer genuine concerns may result in disciplinary action.

Why should I report what I know? What's in it for me?

We all have the right to work in a positive environment and with that right comes the responsibility of acting in an ethical manner and letting the appropriate people know if someone is not acting appropriately. By working together, we can maintain a healthy and productive environment. Corporate misconduct can threaten the livelihood of an entire company.

Does management really want me to raise and report my concerns?

We certainly do. In fact, we *need* you to report your genuine concerns. You know what is going on in our company - both good and bad. You may have initial knowledge of an activity that may be cause for concern. Your reporting can minimise the potential negative impact on the company and our people. Also, your input may help identify issues that can improve corporate culture and performance.

Where do these reports go? Who can access them?

Reports are entered directly on the EthicsPoint secure server to prevent any possible breach in security. EthicsPoint makes these reports available only to specific individuals within QBE who are charged with evaluating the information, based on the type of report and location of the incident. Reports will be treated in confidence.

Isn't this system just an example of someone watching over me?

The EthicsPoint system concentrates on being a positive aspect of our overall philosophy, and allows us to assure a safe, secure, and ethical workplace. You are encouraged to seek guidance on ethical dilemmas, provide positive suggestions, or communicate a concern to us through the EthicsPoint system. Effective communication is critical in today's workplace and this is a great tool to enhance that communication.

We have carefully chosen the best reporting tool to meet our compliance obligations while maintaining a positive reporting environment.

Reporting Security & Confidentiality

If I wish to raise an anonymous concern and send this from a QBE computer, will the server log identify me?

EthicsPoint does not generate or maintain any internal connection logs with IP addresses, so no information linking your PC to EthicsPoint is available. In fact, EthicsPoint is contractually committed not to pursue a reporter's identity.

If you feel uncomfortable raising a concern on your work PC, you have the option of using a PC outside our work environment (such as one located at an Internet café, at a friend's house, etc.) through the EthicsPoint secure website. Many people choose this option, as EthicsPoint's data shows that fewer than 12% of reports are generated during business hours.

Can I raise a concern from home and still remain anonymous?

Yes. An Internet portal never identifies a visitor by screen name and the EthicsPoint system strips away Internet addresses so that anonymity is totally maintained. Plus, EthicsPoint is contractually committed not to pursue a reporter's identity in the event that a concern is raised anonymously.

I am concerned that the information I provide EthicsPoint will ultimately reveal my identity. How can you assure me that will not happen?

The EthicsPoint system is designed to protect your anonymity. However, if you wish to remain anonymous, you - as a reporting party - need to ensure that the body of the report does not reveal your identity by accident. For example, "From my cube next to Jan Smith..." or "In my 33 years..."

Is the telephone toll-free hot line confidential and anonymous too?

Yes. You will be asked to provide the same information that you would provide in an Internet-based report and an interviewer will type your responses into the EthicsPoint Web site. These reports have the same security and confidentiality measures applied to them during delivery.

What if I want to be identified with my report?

There is a section in the report for identifying yourself, if you wish.

Tips & Best Practices

I am aware of some individuals involved with unethical conduct, but it doesn't affect me. Why should I bother reporting it?

QBE chooses to promote ethical behaviour. All unethical conduct, at any level, ultimately hurts the company and all employees, including you. You only have to consider what has happened in recent corporate scandals to see the disastrous effects that a seemingly harmless lapse in ethics or behaviour can have on an otherwise healthy company. So if you know of any incidents of misconduct or ethical breaches, you have an obligation to report it. Wilful or deliberate failure to report unethical conduct may result in disciplinary action against you.

I am not sure if what I have observed or heard is a breach of QBE's policies or involves unethical conduct, but it just does not look right to me. What should I do?

You need to raise a concern. EthicsPoint can help you articulate your concern, and prepare and file your report so it can be properly assessed and analysed by people in QBE trained to do so. We'd rather you report a situation that turns out to be harmless than let possible unethical behaviour go unchecked because you weren't sure.

What if I remember something important about the incident after I file the report? Or what if there are further questions for me concerning my report?

When you raise a concern you will be contacted by one of the individuals specifically charged with looking after whistleblowing matters at QBE. You will therefore have a point of contact to discuss matters with going forward. In addition, when you file a report at the EthicsPoint Web site or through the EthicsPoint Call Centre, you receive a unique user name and are asked to choose a password. You can return to the EthicsPoint system again either by Internet or telephone and access the original report to add more detail or answer questions posed by a company representative and add further information that will help resolve open issues. We strongly suggest that you return to the site in the time specified to answer any company questions. You and the company will have entered into an "anonymous dialogue," where situations are not only identified, but can also be resolved, no matter how complex.

Are these follow-ups on reports as secure as the first one?

All EthicsPoint correspondences are held in the same strict confidence as the initial report, continuing under the umbrella of anonymity (if a concern has been raised anonymously).

Can I still file a report if I don't have access to the Internet?

You can raise a concern on EthicsPoint from any computer that can access the Internet. You can do this from home. Many public locations, including the public library, have Internet computers. If you don't have access to or are uncomfortable using a computer, you can call the EthicsPoint toll-free hotline, which is available 24 hours a day, 365 days a year.