

# QBE Ethics Hotline (NAVEX EthicsPoint)

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## Ethics Hotline FAQs

### About Ethics Hotline

#### What is the Ethics Hotline?

The Ethics Hotline is a third-party reporting service provided by NAVEX through EthicsPoint, which provides you the ability to submit information to QBE via NAVEX about actual or suspected wrongdoing. The Ethics Hotline also enables you to communicate confidentially with QBE once the report or query has been submitted.

If you are unsure whether you should be submitting a particular concern using the Ethics Hotline submit a confidential 'General query or ask for guidance'.

#### Why do we need a system like the Ethics Hotline?

QBE is committed to providing an environment that enables you to feel safe to speak up. Providing options like the Ethics Hotline, which supports confidentiality, is an important part of our culture.

### Reporting – General

#### How can I submit reports to the Ethics Hotline?

You can confidentially submit reports to the Ethics Hotline via the internet or in some jurisdictions also via telephone.

#### What type of situations should I report?

You can use the Ethics Hotline to disclose information about actual or suspected wrongdoing, where you have a reasonable belief such wrongdoing has occurred, is ongoing, or is likely to occur. You should refer to the [QBE Group Whistleblowing Policy](#) or EO Whistleblowing Appendix for guidance on the kind of wrongdoing you should report as the position differs depending on the jurisdiction you are located in. Generally speaking, you can report:

- a breach of any law or the commission of any criminal offence
- a failure to comply with, or breach of, legal or regulatory requirements or professional obligations
- dishonest or corrupt conduct
- conduct that endangers (or may endanger) public health, safety or the environment
- financial malpractice, financial irregularities, money laundering, misappropriation of funds, impropriety, deception, forgery or fraud

- conduct or activity that may cause financial or non-financial loss or may otherwise be detrimental to the interests, financial position, or reputation of QBE
- misuse of information
- experience of, or being threatened with, retaliation or detrimental treatment due to raising, or intending to raise, a concern, and
- deliberate concealment, discouragement or knowingly delaying the reporting of the above.

If you have a reasonable belief relating to any of the above or any other suspected or actual wrongdoing, then we would encourage you to report this promptly and without delay.

### **Why should I report what I know?**

QBE expects everyone to act honestly, fairly and with integrity, respecting and obeying the law wherever we operate. Each of us has an obligation to appropriately raise concerns about actual or suspected wrongdoing.

### **Does QBE really want me to raise and report my concerns?**

Yes. Speaking up is important, and helps QBE manage risk. Knowing about issues as early as possible can help mitigate any impact on QBE, our customers, and our people.

### **Where do these reports go? Who can access them?**

Reports are entered directly on the EthicsPoint secure server. These reports can only be accessed by specific individuals within QBE who are authorised to evaluate the information, based on the type of report and location of the incident. The QBE individual(s) assessing any reports will then decide how best to direct the information.

Reports will be treated in confidence to the extent possible. Some information will have to be shared to enable appropriate investigation of the matter, to report on the outcomes of the investigation, and for suitable action to be recommended. This can include seeking internal or external technical, financial, legal or similar advice and assistance to support the investigation. The information you provide may also be disclosed to the police and/or other enforcement or regulatory authorities if required by applicable laws or our regulatory obligations, or for other legitimate reasons (for example that we need to report a crime).

## **Reporting Security & Confidentiality**

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

The Ethics Hotline does not generate or maintain any internal connection logs with IP addresses, so no information linking your PC to this 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 secure website.

### **Can I make a report from home and still remain anonymous?**

Yes. An internet portal never identifies a visitor by screen name and the Ethics Hotline system strips away internet addresses so that anonymity is maintained. Additionally, EthicsPoint is contractually committed not to pursue a reporter's identity when a concern is raised anonymously.

### **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 Ethics Hotline web site after your concern has been checked with you. These reports have the same security and confidentiality measures applied to them during delivery. Calls are not recorded.

## **What if I want to be identified with my report?**

QBE encourages you to share your identity when reporting concerns as this allows us to better understand the context of the report, follow up with you directly to clarify information or ask additional questions, and understand how the outcome of an investigation may impact you. Anonymous disclosure may also impact our ability to provide the same level of practical support than if you had provided your identity.

## **Tips & Best Practices**

### **I am not sure if what I have observed or heard is wrongdoing or involves unethical conduct, but it just does not look right to me. What should I do?**

We would encourage you to submit a report. 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.

Concerns submitted to the Ethics Hotline are not automatically deemed whistleblowing matters, however every submission will be reviewed, assessed and the most appropriate response determined. You can also submit a confidential 'General query or ask for guidance' report if you are unsure whether you should be reporting a matter using the Ethics Hotline.

### **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 submit a report or query, you will be contacted through the Ethics Hotline by one of the individuals specifically charged with looking after concerns, including whistleblowing matters, at QBE. You will therefore have a point of contact to discuss matters with going forward.

When you file a report either by phone or internet, you receive a Report Key and are asked to choose a password. You can return to the system anytime either by internet or telephone and access the original report, add more detail including uploading attachments, and ask or answer questions to help resolve the matter.

While it is up to you if you choose to continue communicating following the initial submission, it is incredibly helpful and sometimes vital to progress a matter, for example where additional details are required. It also allows us to give you updates or advise when a matter is closed, even if we are sometimes limited as to the level of detail we can provide.

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

All Ethics Hotline correspondences are held in the same 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?**

Many public locations, including the public library, have computers with access to the internet. However, if you do not have access to a computer with internet, or are uncomfortable using a computer, you can call the Ethics Hotline toll-free hotline in eligible locations, which is available 24 hours a day, 365 days a year.

*Also see QBE's [Group Whistleblowing Policy](#), [EO Whistleblowing Appendix](#), [QBE Data Protection & Privacy Collection Notice](#) (provided prior to submitting a report to the Ethics Hotline via the internet), and [NAVEX's Privacy Statement](#) for more information.*