

## **SCOR Group Policy on Reporting Concerns (the “Group Policy”)**

### **SCOR UK Company Limited (“SCOR UK”) Addendum**

Version 1.0 – 22 April 2020

*For internal use only*

## ABOUT THE DOCUMENT

### Document Information

#### Properties

The document properties are:

Owner	SCOR UK Compliance
In force from	26 February 2020
Author	SCOR UK Compliance Officer
Approved by	Board of directors of SCOR UK

#### Review process

The Group Policy, together with this local addendum for SCOR UK (the "Addendum") shall be reviewed **annually**.

Unless they are minor, changes made to the Addendum are subject to **prior approval by the Board of Directors of SCOR UK**.

The table below outlines any changes made to the Addendum including the present version.

Version & date	Approver	Outcome(s)
1.0 26/02/2020	SCOR UK Board of Directors	Initial version

#### Scope

This Addendum to the Group Policy applies to SCOR UK (referred to hereafter as **the Company**).

#### Applicability

The Group Policy and the Addendum apply to all business activities of the Company and must be complied with by all its directors, officers, employees, including any temporary workers or trainees ("SCOR UK Employees").

#### Approval/Exception process

The Addendum has been submitted to the Group Chief Compliance Officer to review the matter and confirm that additional requirements are in line with the principles of the Group Policy and to check if any exceptions noted can be granted in line with applicable laws and regulations.

#### Change requests

Please send your direct change requests for the Addendum including a description and reasons for change to the Author of the Addendum:

Gillian Phillips [Gillian.Phillips@channel2015.com](mailto:Gillian.Phillips@channel2015.com)

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## 1 INTRODUCTION

SCOR Group policies and local addenda have been designed to ensure a good balance between two key principles: consistency across the SCOR Group and respect of the specificities and legal or regulatory requirements applicable at local legal entity level.

SCOR Group policies define the principles which must be respected across the SCOR Group.

Where it is considered that additional requirements/exceptions are required to supplement a Group policy, a local legal entity specific policy addendum sets out these requirements, in addition to the Group policy as follows:

- Specifications relevant for the local legal entity
- More stringent rules based on applicable local laws/regulations (if any)
- Exceptions (if any) to principles and minimal standards defined at Group level as may be required under applicable local laws or regulations (if any)

The purpose of this Addendum is to complement the SCOR Group Policy on Reporting Concerns with regard to the additional obligations that apply to the Company by virtue of UK laws and regulations, as set out in more detail in section 3.2 below.

## 2 EXECUTIVE SUMMARY, BACKGROUND AND OBJECTIVES

No changes required.

## 3 GENERAL PRINCIPLES AND REQUIREMENTS

### 3.1 Conduct Covered by the Group Policy

No changes required.

### 3.2 Reporting Procedure and Investigation (Except relating to Specified Persons as described in 3.3)

#### 3.2.1 Additional requirements for the Company

In the UK, The Public Interest Disclosure Act 1998 sets out the duties of the Company to provide a means of making serious allegations about standards, conduct, financial irregularity or possible unlawful action that will ensure confidentiality and protect those making such allegations.

The Financial Conduct Authority (FCA) alongside the Prudential Regulation Authority (PRA) introduced in 2016 rules designed to build on good practice in the financial services industry to encourage a culture whereby individuals feel able to raise concerns and challenge poor practice and behaviour. The company must establish, implement, and maintain appropriate and effective arrangements for the disclosure of reportable concerns by those making an allegation ("whistleblowers").

A Senior Manager of an insurer must be appointed by the Board of Directors as the whistleblowers' champion and must be assigned with the responsibility for ensuring and overseeing the integrity, independence and effectiveness of the insurance firms' policies and procedures on whistleblowing ("Internal Arrangements"), including those policies and procedures intended to protect whistleblowers from being victimised because they have disclosed reportable concerns.

The Board of Directors of the Company has determined that its whistleblowers' champion shall be the Chair of the Company's Audit Committee and the whistleblowers' champion's details must be made available to all staff.

All SCOR UK Employees have also the right to report externally if they do not feel the issue is being treated appropriately by the Company, or within the wider SCOR Group. This can be done without the knowledge or the need to obtain permission from the Company

If the concern is regarding an entity regulated by the UK Financial Services Register, the regulatory body that oversees this, the FCA should be contacted. The FCA's telephone number is 0207 066 9200 and the email is [whistle@fca.org.uk](mailto:whistle@fca.org.uk).

### **3.2.2 Internal Arrangements of the Company and contact details**

The Company's Internal Arrangements on whistleblowing are those as set out in the Group Policy.

Concerns can be reported to the persons indicated in the Group Policy.

As noted above, the Board of Directors of the Company has determined that its whistleblowers' champion shall be the Chair of the Company's Audit Committee.

The whistleblowers' champion's details are included on Appendix A which summarises all contact details.

If a SCOR UK Employee feels the issue is not treated appropriately by the person(s) who has received the Reported Concern as set out in the Group Policy and the concern is regarding SCOR UK, he/she can contact the FCA who is the UK regulatory body that oversees this. The FCA's contact details are included on Appendix A.

### **3.3 Reporting Procedure and Investigation Relating to Specific Persons**

No changes required.

### **3.4 Obligation to maintain absolute confidentiality of the investigation**

No changes required.

### **3.5 Anonymous Alerts**

No changes required.

### **3.6 Personal Data Processing and Retention**

No changes required.

### **3.7 Protection and Sanctions**

No changes required.

### **3.8 Reporting to Audit Committee**

Any concerns related to the Company, shall, where appropriate, also be reported to the Company's Audit Committee.

The Company's Audit Committee will receive an annual Reporting Concerns (Whistleblowing) report that comments on the operation and effectiveness of the controls in place.

#### 4 ORGANISATION, TASKS, ROLES AND RESPONSIBILITIES

**Additional role to be included, as detailed below.**

Roles	Duties and Tasks
SCOR UK Whistleblowers' Champion	<ul style="list-style-type: none"> <li>Ensure and oversee the integrity, independence and effectiveness of the Company's policies and procedures on whistleblowing, including those policies and procedures intended to protect whistleblowers from being victimised because they have disclosed reportable concerns. Report to the Company's Audit Committee at least annually, and in a way that maintains the confidentiality of individual whistleblowers, on the operation and effectiveness of its systems and controls in relation to whistleblowing.</li> </ul>

#### 5 SUPPORT AND HELP

No changes required.

#### 6 DOCUMENTS AND PROCESSES LINKED TO THIS POLICY

**Additional document to be included, as detailed below.**

Name of the document	Description	Scope
SCOR Group Policy on Reporting Concerns	Provides all SCOR Employees and Third Parties with a process for reporting certain matters of which they become aware in the course of their duties, to protect SCOR values and ensure compliance with applicable laws and regulations.	SCOR Group
SCOR Group Statement on Slavery and Human Trafficking pursuant to the United Kingdom Modern Slavery Act	This Statement has been issued by SCOR SE to demonstrate SCOR's commitment to human rights and ethical behaviour.	SCOR Group

## Appendix A – Whistleblowing / Reporting Concerns Fact Sheet

# Whistleblowing: Where to get help

**“I have concerns about wrongdoing at work that I can’t tell my line management about. Who can I speak to internally in confidence?”**

You can speak to our Compliance Officer:

**Name:** Gillian Philips

**Phone:** 0203 535 8176

**Email:** [gp@channel2015.com](mailto:gp@channel2015.com)

Or alternatively you can speak to our Whistleblowing Champion & Chairman of the Audit Committee (details TBC):

Or alternatively you can speak to EMEA Hub General Counsel:

**Name:** Marietta Osiander

**Phone:** +33 1 58 44 89 32

**Email:** [mosiander@scor.com](mailto:mosiander@scor.com)

**“What if I don’t feel comfortable about reporting it internally or I’ve tried and it hasn’t worked?”**

**Contact the Financial Conduct Authority:**

**Whistleblowing contact line:** 020 7066 9200

**Email:** [whistle@fca.org.uk](mailto:whistle@fca.org.uk)

**Post:** Intelligence Division (ref PIDA) Financial Conduct Authority  
25 The North Colonnade, Canary Wharf, London E14 5HS

**Website:** [www.fca.org.uk/site-info/contact/whistleblowing](http://www.fca.org.uk/site-info/contact/whistleblowing)

**Further information**

See: TCMA Whistleblowing Policy

**“How am I protected?”**

For free, confidential advice, contact Public Concern at Work, an independent charity:

**Tel:** 0207 404 6609

**Website:** [www.pcaw.co.uk](http://www.pcaw.co.uk)