

SCOR Group Reporting Concerns Policy and Guidelines

SCOR Global Reinsurance Ireland dac (SGRI) Addendum

Version 7.0 – 17th November 2022

For internal use only

ABOUT THE DOCUMENT

Document Information

Properties

The document properties are:

Owner	Head of Compliance
In force from	1 st March 2020
Author	SGRI Compliance Function
Approved by	SGRI Audit Committee

Review process

This SGRI Addendum to SCOR Group Reporting Concerns Policy and Guidelines shall be reviewed at least once per year.

Unless they are minor, changes made to this SGRI Addendum to SCOR Group Reporting Concerns Policy and Guidelines are subject to prior approval by the prior approval by the Board of Directors of SGRI.

The table below contains reference to the annual review of this Addendum (including the present version).

Version & date	Approver	Reviewer	Main changes
Version 5.0	SGRI Audit Committee	SGRI Audit Committee	Guidelines re-formatted to be in line with current template.
Version 6.0	SGRI Audit Committee	SGRI Audit Committee	Annual Review
Verson 7.0	SGRI Board	SGRI Compliance Function	SGRI Addendum has been subtsiansialy updated to address the areas not covered by the Group Reporting Concerns Policy and Guidelines as listed in a newly enacted Protected Disclosures (Amendment) Act 2022.

Scope

These local Guidelines apply to SCOR Global Reinsurance Ireland dac (the Company) and set out any additional requirements in respect of local applicable laws, regulations or any further requirements.

Applicability

SCOR Group Reporting Concerns Policy and Guidelines apply to all business activities of SCOR and must be complied with by all directors, officers, employees, including any temporary workers or trainees. Group Policy and Guidelines also apply to third parties such as contractors, consultants and vendors (hereinafter "Third Parties"). This Addendum extends the applicability to the shareholders, volunteers, members of the administrative, management or supervisory body of an undertaking (eg., non-executive directors) and those involved in recruitment process and/or pre-contractual negotiations.

Exception process

Please send your requests for any exception including the reasons why an exception is needed to the Author of this Addendum: Head of Compliance rsongailaite@scor.com.

Change requests

Please send your direct change requests including the reasons for change to the Author of this Addendum: Head of Compliance rsongailaite@scor.com.

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1. EXECUTIVE SUMMARY

SCOR Group Policy and Guidelines on Reporting Concerns have been designed to ensure a good balance between two key principles: consistency across the Group and respect of the independence of legal entities. In particular, legal entities should consider the appropriateness of the Group Policy and Guidelines and assess any local specifications needed for the entity.

The Group Policy and Guidelines for Reporting Concerns set out the reporting guidelines which apply to all employees of SCOR SE and any of its direct or indirect subsidiaries and/or Branches. The Policy and Guidelines provide SCOR employees and third parties with a transparent process for reporting certain matters of which they become aware in the course of their duties, to protect SCOR values such as integrity, professionalism, honesty and responsibility and ensure compliance with applicable laws and regulations.

The Company respects the principles of the Group Policy and Guidelines on Reporting Concerns. The Policy and Guidelines aim to foster a culture of integrity and responsibility within SCOR, enable management to be made aware of possible issues at an early stage and put in place a framework which ensure that employees are not subject to unfair treatment in response to expressing concerns.

The aim of the local addendum is to supplement the Group Policy and Guidelines and take into account local regulatory obligations, particularly on senior management and Directors in the context of reporting concerns. The local addendum aim to ensure the Company complies with both Group Policy and Guidelines and any additional local requirements.

2. OBJECTIVES

On 21st July 2022, the [Protected Disclosures \(Amendment\) Act 2022](#)¹ was signed into Irish law. The Act updates the [Protected Disclosures Act 2014](#) and transposes the [EU Whistleblowing Directive](#) into Irish law.

- In July 2022, SGRI Board adopted SCOR Group Policy and Guidelines on Reporting Concerns which incorporates the internal reporting requirements to comply with [EU Whistleblowing Directive](#).
- 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 extra requirements listed in the Protected Disclosures (Amendment) Act 2022.

3. GENERAL PRINCIPALS AND REQUIREMENTS

[Protected Disclosures \(Amendment\) Act 2022](#) reversed the burden of proof for penalisation cases. This means the Company will need to prove that any alleged penalisation was not a direct result of the employee making a protected disclosure.

In any proceedings by an employee under the [Workplace Relations Act 2015](#) in respect of an alleged wrongdoing, the penalisation shall be deemed to have been as a result of the employee having made a protected disclosure, unless the Company proves that the act or omission concerned was based on duly justified grounds.

3.1. Conduct Covered by this Addendum

Based on the [Protected Disclosures \(Amendment\) Act 2022](#), this Addendum excludes interpersonal grievances² from the scope of reporting concerns.

¹ It will be commenced or 'take effect' from 1st January 2023.

² Grievances about interpersonal conflicts and complaints to (or about) an employee's employer which concern the worker exclusively.

3.2. Reporting Procedures and Investigation

3.2.1 Initial Report by the Reporter

The Company encourages escalation of matters concerning practices or actions that are believed to be inappropriate, unethical or illegal through the Head of Compliance. Alternatively, reports may be made:

- For Executive Committee members³ and members of the SGRI Board of Directors⁴ - to the SGRI CEO.
- For the SGRI CEO - to the SCOR SE CEO
- For the Chairman of the Board of Directors of SGRI - to the Chairman of the Board of Directors of SCOR SE.

For all other cases please refer to Appendix 1: Internal and External Reporting Channels.

3.2.2. Anonymous Reporting

[Protected Disclosures \(Amendment\) Act 2022](#) does not oblige the Company to accept and follow-up on anonymous reports. If the Company considers it is appropriate to do so, the concern reported will be dealt with as per anonymous reporting requirements listed in the Group Policy and Guidelines on Reporting Concerns.

Where a reporter's identity subsequently becomes known, the protection against penalisation will extend to them as per [Protected Disclosures \(Amendment\) Act 2022](#).

3.2.3. Report Contents

No change.

3.2.4. Reporting Concerns Committee

No change.

3.3. Obligation to Maintain Absolute Confidentiality of the Investigation

Where the identity of the reporting person must be disclosed, the Company shall notify the reporting person writing and before their identity or the information concerned is disclosed.

3.4. Personal Data Processing and Retention

No change.

3.5. Anti-Retaliation

No change.

3.6. Reporting to Audit Committee

³ except the SGRI CEO

⁴ except for the Chairman of the Board of Directors of SGRI

The Company's Audit Committee is responsible for the review and approval of the local addendum. The Addendum will be reviewed annually and will be revised as necessary.

Where appropriate, any reported concerns related to the Company, shall be notified by the Head of Compliance to the Company's Audit Committee without compromising the confidentiality.

3.7. Reporting to the Regulator

Employees have the right to report concerns to the Central Bank of Ireland. This can be done without the knowledge or the need to obtain permission from the Company. Both the Protected Disclosures (Amendment) Act 2022 and Part 5 of the Central Bank (Supervision and Enforcement) Act 2013, provide protections to employees who make protected disclosures.

Where the reported concern investigation concludes that there was a breach or a deviation from the regulatory obligations applicable to the Company, the Central Bank of Ireland (CBI) will be informed in 5 working days.

4. ORGANISATION, TASKS, ROLES, AND RESPONSIBILITIES

The list of duties and tasks described hereafter is not exhaustive. It focuses on the main responsibilities of the stakeholders, in addition to those set out in the Group Policy or as required by regulation.

Roles within the SGRI	Duties and Tasks
Audit Committee	<ul style="list-style-type: none"> Approves the SGRI Guidelines on Reporting Concerns; Where appropriate, receives any reported concerns related to the Company.
Head of Compliance (Lead Investigator)	<ul style="list-style-type: none"> Acknowledges the receipt of the reported concern to the Reporter; Advises the Special Counsel of the nature of the reported matter; In consultation with Special Counsel agree on appointment of investigator(s) for each Reported Concern; Carries out investigation into Reported Concern; Informs the Reporter and the Subject about the reported concern and the outcomes as detailed above; Where appropriate, reports concerns to the SGRI Audit Committee; Keeps records for all documentation pertaining to reported concerns, including initial assessment, acknowledgements and notifications, investigation, feedback to reporter and actions taken to address reported concern; Ensures record keeping for Reported Concerns is maintained in line with the Group Data Protection Policy and Archiving and Retention guidelines; Escalation to CEO & Chair where any material deviations from regulatory obligations that have been uncovered as part of a Reported Concern investigation and agree if CBI needs to be notified.
Head of HR	<ul style="list-style-type: none"> Where the Head of Compliance has a conflict of interest, act⁵ as Lead Investigator and complete all associated duties and tasks where the Head of Compliance has a conflict of interest.
Line Manager	<ul style="list-style-type: none"> Immediately notify the Lead Investigator on the receipt of a Reported Concern.
CEO & Chair	<ul style="list-style-type: none"> Escalate to the Board any material deviations from regulatory obligations that have been uncovered as part of a Reported Concern investigation.
All Employees	<ul style="list-style-type: none"> Read understand and follow the local addendum and Group Policy and Guidelines on Reporting Concerns.

⁵ if a report involved fraud in underwriting or accounting it would not be HR.

5. SUPPORT AND HELP

No change.

6. DOCUMENTS AND PROCESSES LINKED TO THIS ADDENDUM

No change.

APPENDIX 1: INTERNAL AND EXTERNAL REPORTING CHANNELS

Internal Reporting Channels

Anonymity	Report to	Method
Not anonymous	Line Manager (1 st instance)	Orally (telephone or meeting)
	Head of Compliance (2 nd instance)	E-mail
	Head of HR (3 rd instance)	Letter
	Via tool on www.SCOR.com	Report a concern EN SCOR
Anonymous	Via tool on www.SCOR.com	Report a concern EN SCOR

External Reporting Channels

Anonymity	Method
If the worker doesn't want to report to their employer or reporting to their employer hasn't worked they can report to a regulator, known as a "prescribed person"	<p>Central Bank of Ireland is a prescribed person.</p> <p>Where a worker wishes to make a report to the Central Bank under the 2014 Act relating to breaches of financial services legislation by their employer, they may make the disclosure through the following channels:</p> <p>E-mail: confidential@centralbank.ie Phone: 1800 130 014 Post: Protected Disclosures Desk, Central Bank of Ireland, PO Box 559, Dublin 1.</p>
If you wish to make a Protected Disclosure that falls outside the scope of the Central Bank of Ireland, you may contact the Protected Disclosures Commissioner who will assist in directing to the appropriate Body.	Contact details are not yet available. The new Office of the Protected Disclosures Commissioner (Mr Ger Deering) will commence operations on 1 st January 2023.
The Transparency Legal Advice Centre (TLAC) provides free legal advice to anyone who wishes to disclose wrongdoing, particularly under the Protected Disclosures Act.	You can access this via the Speak Up helpline on 1800 844 866.