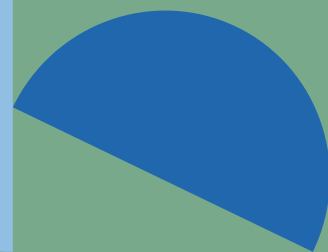
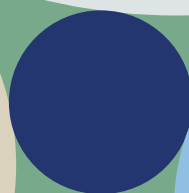
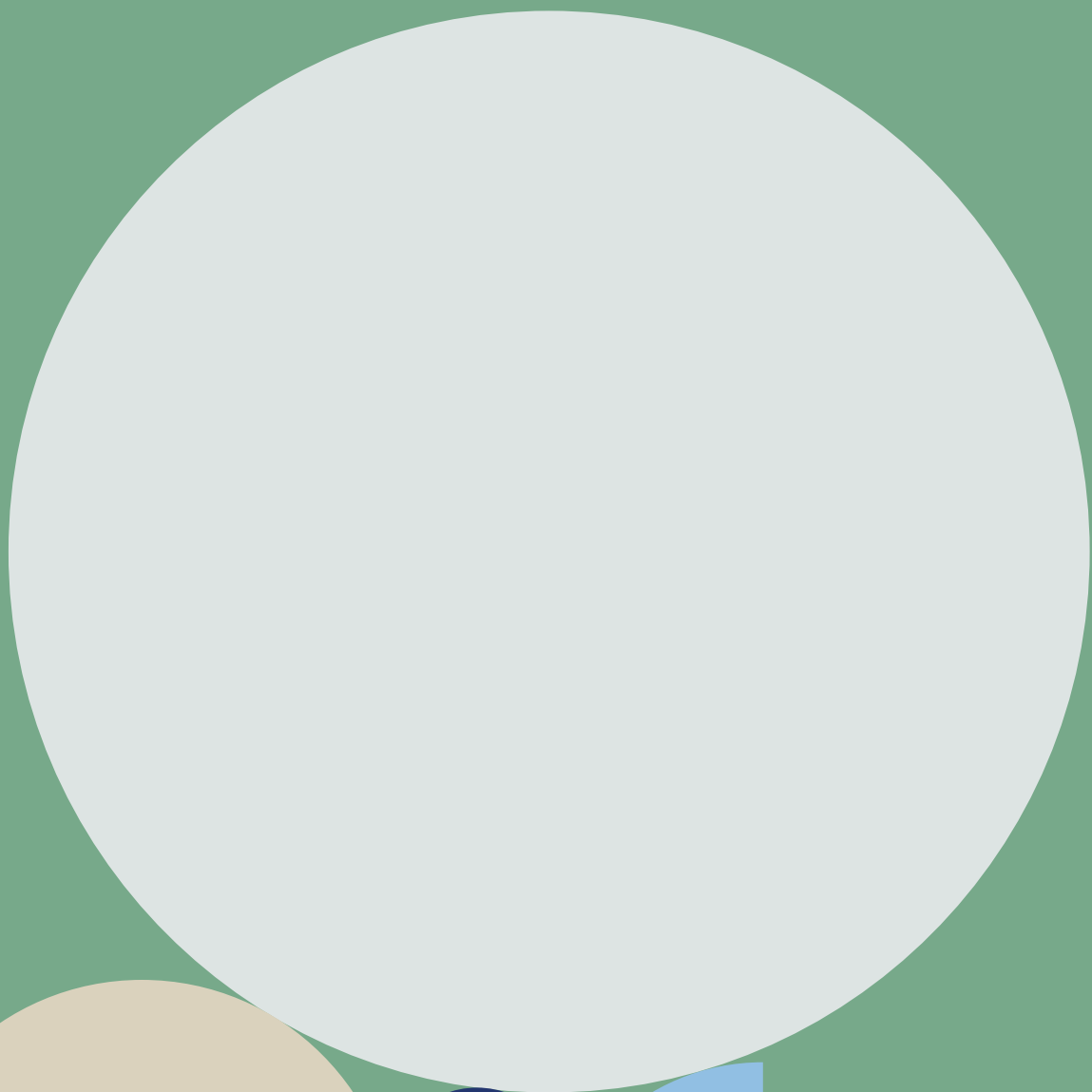


# Whistleblowing (external)

Local Guidance – Zurich Eurolife S.A.



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# 1. Introduction

Zurich Eurolife is committed to fostering a ‘Speak Up’ culture across the organization; a culture marked by an inclusive workplace where employees feel a sense of belonging, are free to express their views and opinions without fear of retaliation, and confident that their voices will be heard. Employees are encouraged to constructively express their opinions, contribute ideas, or challenge the status quo to help Zurich Eurolife create a brighter future together. Employees speak up promptly and can report any alleged wrongdoing including any suspected or actual illegal, fraudulent, improper or unethical conduct (“**Integrity Concerns**”).

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## 1.1. Purpose

This Local Standard is aimed at external persons (in particular the following categories as mentioned in the local applicable law on whistleblowing (hereinafter the “Whistleblowing Law”)<sup>1</sup>: former and prospective employees, board members, contractors, outsourcing partners, employees of subcontractors or suppliers) (hereinafter the “Reporting Persons”). The purpose of the Local Standard is to provide Reporting Persons with practical and clear direction as to how they can report Integrity Concerns. The Local Standard is fully aligned with the requirements in the Group Policy on Speaking Up about Integrity Concerns (“Group Policy”), the Group Standard on Speaking Up about Integrity Concerns, as well as the Guidance on Dealing with Integrity Concerns.

Zurich Eurolife encourages Reporting Persons to utilise the Zurich Ethics Line, in order to allow Zurich Eurolife to thoroughly investigate the report and to quickly take any actions necessary. Zurich Eurolife’s internal reporting mechanisms are designed to handle reports with utmost professionalism, confidentiality and sensitivity, allowing us to swiftly and appropriately address any identified issues.

Reporting Persons can also report Integrity Concerns to the Commissariat aux Assurances 11, Rue Robert Stumper, L-2557 Luxembourg, Grand Duchy of Luxembourg: [Whistleblowing / Lanceur d'alerte - Commissariat aux Assurances \(caa.lu\)](https://caa.lu).

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## 1.2. Scope

This guidance applies to Zurich Eurolife S.A.

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## 1.3. Related documents

- Zurich Code of Conduct
- Group Policy on Speaking Up about Integrity Concerns
- Group Standard on Speaking Up about Integrity Concerns
- Guidance on Dealing with Integrity Concerns

# 2. Guidance

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## 2.1. Reporting Integrity Concerns

The Zurich Ethics Line may be used by a Reporting Person (defined as the person reporting an Integrity Concern) to report Integrity Concerns either via telephone or online via a web form..

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<sup>1</sup> Law of May 16, 2023 transposing Directive (EU) 2019/1937 on the protection of persons who report violations of the law of the Union.

### 2.1.1. Zurich Ethics Line

The Zurich Ethics Line is a reporting channel that allows Reporting Persons to report Integrity Concerns either via telephone or online via a web form, and to do so anonymously if they choose. The Zurich Ethics Line is managed by an independent third-party provider and is maintained by Group Compliance. The independent third-party provider documents all reports received and directs them to the appropriate Triage Committee as defined below for review in accordance with Zurich's confidentiality obligations.

~~When making a report via the Zurich Ethics Line, the Reporting Person may request that the report be initially reviewed at the Group level by a member of the Corporate Center Triage Committee.~~

### 2.1.2. Anonymity and consent

Except in the cases provided by the Whistleblowing Law, the Reporting Persons are given the option to report an Integrity Concern anonymously, including by using the Zurich Ethics Line, if they are not comfortable identifying themselves.

By providing identification details the Reporting Person consents to disclosing his or her identity in accordance with the above mentioned Law.

### 2.1.3. No retaliation

Zurich Eurolife does not tolerate retaliation, including threats and attempts of such, against any Reporting Person who reports an Integrity Concern with reasonable grounds to believe the information reported was true at the time of reporting, i.e., in good faith. Thus, when making a report, Reporting Persons do not need to be certain or have definitive proof, but only need to have reasonable grounds to believe that the information reported is true at the time of reporting. If it turns out that they were mistaken, they will not face negative consequences for speaking up and reporting. However, deliberately or knowingly providing false or misleading information when reporting an Integrity Concern or in the course of an investigation (e.g., by a Reporting Person or witness) is not tolerated. Corrective actions, up to and including criminal and/or civil charges and other possible remediation actions, are to be expected.

Reporting Persons who believe they are victims of retaliation should make a report in the Zurich Ethics Line.

Corrective action, up to and including termination of employment, is to be expected for engaging in or tolerating retaliation against a Reporting Person, witness, investigator or other third persons who are connected with the Reporting Person and could suffer retaliation in a work-related context, such as colleagues or relatives of the Reporting Person.

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## 2.2. Review of Reports

Zurich Eurolife is committed to reviewing and, if required, investigating all Integrity Concerns, as well as taking appropriate measures in response.

The review of Integrity Concerns is carried out by one of three types of Triage Committee specified below, collectively referred to as "**Triage Committees**".

### 2.2.1. Types of Triage Committees

All reports received through the Zurich Ethics Line or any other reporting channel must be reviewed by a Triage Committee. Triage Committees are comprised in general of representatives from Compliance, HR and Legal. The Triage Committees must evaluate every report received, and determine, based on the nature, type and severity of the allegations or suspicions raised:

- whether the matter is an Integrity Concern
- if an Integrity Concern, whether an investigation is required, and
- if so, which function should investigate and/or undertake next steps.

There are three types of Triage Committees at Zurich Eurolife:

- Group Triage Committee
- Corporate Center Triage Committee
- Regional and Local Triage Committees

In Zurich Eurolife S.A., reports will be reviewed by the Local Triage Committee, which is comprised of the Chief Compliance Officer (Compliance representative), Senior Legal Counsel (Legal representative) and HR Business Partner (HR representative). The Local Triage Committee has the responsibility in the first instance for triaging all reported matters other than those raised against Regional level employees, but where a decision cannot be reached by the Local Triage Committee, the decision will be escalated to the Regional Triage Committee for resolution. The Local Triage Committee will also seek guidance and support from the Regional Triage Committee as necessary.

Matters involving a Group ExCo member, Country CEO or Key Risk Taker will in all instances be forwarded to the Group Triage Committee for evaluation, and determining next steps.

### **2.2.2. Investigations**

Zurich Eurolife is committed to conducting investigations of Integrity Concerns in a timely, thorough and professional manner, consistent with all local laws and regulations, and in a way that will gather the facts necessary to allow for an assessment of the issue raised.

All participants in the investigation, including the Reporting Person and the person who is the subject of the report, must be treated with equal respect, fairness and consideration.

Corrective actions, up to and including termination of employment, criminal and/or civil charges and possible remediation actions, are to be expected if any wrongdoing is found.

### **2.2.3. Confidentiality and the “need to know” principle**

Zurich Eurolife treats all reports of Integrity Concerns confidentially (i.e., on a strict need-to-know basis), including the identity of the Reporting Person and persons who are the subject of the report and/or part of the investigation. Individuals who are interviewed or asked for information during the course of an investigation are asked to maintain confidentiality as to the interview/request and the reported misconduct.

### **2.2.4. Conflicts of interest**

If members of a Triage Committee are in an actual or perceived conflict of interest, they must recuse themselves from the triaging process.

At no time can an investigation into allegations directed at a local function be assigned to that same local function to investigate. However, representatives from that function at the Group or Regional level could be given responsibility for such an investigation, consistent with local laws and regulations.

### **2.2.5. Communications with the Reporting Person**

If required during the course of an investigation, the Triage Committee and/or the investigator will be in contact with the Reporting Person and the person who is the subject of the report at different stages. Subject to legitimate considerations of Zurich Eurolife, the Reporting Person will also be informed at the conclusion of an investigation. Such communication will be carried out anonymously via the Zurich Ethics Line tool if the Reporting Person has raised an Integrity Concern anonymously through the Zurich Ethics Line. While the aim is to be transparent, some information about the investigation will need to remain confidential.