

We want everyone, both within the company and externally, when they have contact with Hiscox, to feel that they are dealing with a decent organisation which lives its values. Harassment, bullying and discrimination of any kind have no place at Hiscox. We have an employee conduct philosophy to ensure all our staff know what is expected of them, and a harassment and bullying policy that makes clear it is incumbent on all of us to behave in a manner which is not offensive to others. These are supported by local People Function policies and handbooks.

### **A) Grievance procedure**

Where problems arise during the course of employment, our aim is for them to be aired and, where possible, resolved quickly and to the satisfaction of all concerned. If this cannot be achieved using an informal route, which may be by raising it with your line manager in the first instance, then we have a fair and equitable grievance process through which action can be taken if necessary. We take this process very seriously and follow it in every case.

### **B) Whistleblowing – expressing your concerns**

The Hiscox Whistleblowing policy commits the organisation to ensuring that a person will suffer no retaliation or detrimental treatment as a result of raising a genuine concern about mistreatment or malpractice. This policy ensure that both internal and external stakeholders feel empowered to raise concerns in confidence and without fear of unfair treatment.

#### **1.1 Who is eligible to report a concern?**

Whistleblowing occurs when a person makes a disclosure of information about a danger, risk, malpractice or wrongdoing or provides certain types of information, usually about illegal or dishonest practices within an organisation. A whistleblower is a person who raises a genuine issue relating to a whistleblowing concern.

The Whistleblowing policy will apply to all who acquire information on breaches, which includes (but is not limited to) the persons listed:

- All Hiscox's current and former employees
- Hiscox job applicants or those whose employment contracts have not started
- Officers
- Contractors, subcontractor, its direction members and their employees
- Volunteers, interns or trainees
- Casual workers
- Suppliers and agency workers
- Shareholders and members of the administrative, management or supervisory non-executive bodies.

#### **1.2 What can be reported?**

The following is a non-exhaustive list of matters which might be considered as whistleblowing concerns:

- criminal offences
- fraud or misconduct
- financial mismanagement
- health and safety issues
- failure to investigate allegations of harassment or assault by one employee against another
- failure to comply with legal obligations

- bribery, or corruption or financial crime
- failure to comply with regulatory obligations
- failure to comply with internal policies and procedures
- behaviour that is likely to harm the reputation or financial well-being of Hiscox
- the deliberate concealment of the above
- threat for public interest or a legislation violation

### 2. Internal reporting channel and external reporting channel

Whistleblowing concerns may be raised through a number of different internal channels and externally.

#### 2.1 Reporting through internal channels

In order to make our internal channel compliant with the above measures, it will remain available for staff members through the channels described in the Policy and Procedures available on the intranet (*The Gallery*).

**The below channels are extended to all eligible persons via:**

**Web**, via: <https://www.safecall.co.uk/report/>

**Service call**: the Safecall service is available 24/7 365 days via the number below and allows you to speak to someone in your preferred language (see following link for international freephone numbers - <https://www.safecall.co.uk/en/file-a-report/telephone-numbers/>)

**Email address**: [whistleblowing@hiscox.com](mailto:whistleblowing@hiscox.com)

**Post to the following address**: 22 Bishopsgate, London EC2N 4BQ; United Kingdom, attn Roshni Patel

**In person**: Concerns can also be reported in person. If this is your preference, please let us know using one of the above channels.

If you request an in-person meeting, the meeting may, subject to your consent, be documented by (I) recording the conversation in a durable and retrievable form or (II) keeping accurate minutes of the meeting prepared by members who are responsible for handling your report. We also offer you the opportunity to check, correct and approve the minutes of the meeting by signing them.

Reporting can be done anonymously if preferred, and every effort will be made to preserve the confidentiality of the whistleblower. The identity of the whistleblower or any third parties involved will only be disclosed in circumstances where this becomes unavoidable by law (for example due to the obligation of Hiscox to inform the authorities if the facts are likely to constitute a crime or misdemeanour).

#### ***Measures against retaliation and confidentiality***

Hiscox will not permit any retaliation or harassment against a whistleblower or any connected person who assists in an investigation due to their involvement in a report and/or investigation. This also applies in cases where an investigation does not confirm the allegations made.

Your information will be treated confidentially. This confidentiality also applies to all other information from which the identity of the reporter can be directly or indirectly derived. We take appropriate measures to handle all information received carefully and to safeguard the interests of all those involved. All data provided will be processed in accordance with applicable data protection regulations and our privacy statement. For more information about our privacy statement please revert to our website: <https://www.hiscoxgroup.com/site-tools/privacy>

### ***Follow-up***

When you submit a report, you will receive confirmation of receipt within seven days.

We encourage you to provide us with a contact detail (like your name and/or an email address) when submitting a report. This way we can contact you for any follow-up questions. However, if you prefer to remain anonymous, we will respect your decision and your case will still be investigated.

Feedback will be provided within a reasonable timeframe which shall not exceed three months from the acknowledgement of receipt.

### **2.2 Reporting through external channel**

Whistleblowing alerts may be reported independently to a relevant regulator; one such example is the UK FCA and PRA's whistleblowing channels.

In addition, whistleblowing alerts may also be reported independently to the Commissariat aux Assurances (CAA) in Luxembourg. External channels are also available with the relevant regulators within the other European countries in which HSA operates.

It is recommended that all eligible reporting person to first use our internal alert procedure via the channels described above before contacting the regulator for external report.