

# Whistleblowing Policy

## SEB Life International





## SEB Life International's Values and Behaviours

SEB Life International's ("SEB LI") core behaviours – create value, act long-term and build positive relationships, guide us in our daily work. The way we behave, act, and do business should also serve SEB LI's corporate purpose.

We expect our leaders to induce a strong sense of purpose to the business and embrace equal opportunities for employees to achieve their full potential. We value our employees' commitment, self-leadership, responsibility, and ability to collaborate and be considerate towards colleagues, as well as their willingness to serve our customers.

SEB LI works actively with the entire organisation, leaders, and teams in order to meet a changing environment and do what it takes to continue creating long-term value for our customers, shareholders, and other stakeholders.

We promote an inclusive culture where our employees feel respected and valued. To reflect our customer base and diversity in society, we always strive to ensure that our teams and management are balanced in terms of gender, age, competencies, as well as national and ethnic origin.

We reject all forms of discrimination or harassment, and strive to ensure that all employees, regardless of ethnic or national origin, gender, transgender identity or expression, skin colour, faith, religion, citizenship, age, disability, civil status, or sexual orientation are treated with respect, and that all employees are given equal opportunities. This is equally important in relation to customers and other stakeholders as well as in relation to our colleagues.

At SEB LI, we work proactively to achieve a sound workplace. A healthy work environment is essential to the well-being of our employees and thereby lays the groundwork for successful business results and long-term value.

As SEB LI employees, we all also have an individual responsibility to ensure that we have an attractive and safe work environment in which every employee is appreciated and respected.

We are responsible to react if we discover behaviours that are inconsistent with our ethical guidelines, and take appropriate action if, as an example, a colleague engages in harmful use or irresponsible activities.

We are also, all of us, responsible for contributing to a sound balance between work and leisure time to avoid stress related problems.



## Whistleblowing Procedures

Acting ethically and taking measures to prevent irregularities is an important part of SEB LI's culture, we therefore have process for reporting irregularities.

If you, as an employee or any other party affected by our business discover potential or actual breaches of regulatory or internal requirements, unethical or unlawful behaviour, you should report your observations.

- You may report anonymously
- You may report verbally or by writing to the authorised recipient<sup>1</sup>
- You may request a physical meeting with the authorised recipient
- You may file a report during or outside working hours

Concerns may be reported via the following channels:

Authorised Recipients: Head of Compliance and Head of Internal Audit

### Anonymous Reporting:



[WhistleB, Whistleblowing Centre](#)

### Internal reporting:



[WhistleB, Whistleblowing Centre](#)



[orla.golden@seb.ie](mailto:orla.golden@seb.ie)



+353 (1) 487 0700



Bloodstone Building, Sir John Rogerson's Quay, Dublin 2, D02 KF24

### External reporting:

#### Central Bank of Ireland



1800 130014



[confidential@centralbank.ie](mailto:confidential@centralbank.ie)



Protected Disclosures Desk,  
Central Bank of Ireland, PO Box 11517, Spencer Dock,  
North Wall Quay, Dublin 1, D01 W920

#### Protected Disclosures Commissioner



353 1 639 5650



[disclosures@opdc.ie](mailto:disclosures@opdc.ie)



Office of the Protected Disclosures Commissioner,  
6 Earlsfort Terrace, Dublin 2, D02 W773



<sup>1</sup> If you have not reported anonymously your identity will be kept confidential during the subsequent follow-up, enquiries and discussions relating to the matter, provided that we are not obliged by law to disclose it. If this should be the case, you will be properly informed.

## Examples of wrongdoing:

If you have a legitimate concern about relevant wrongdoing<sup>2</sup> in the workplace which you feel is, was or may be a breach of SEB LI policies or appears unlawful, illegal, criminal, or unethical we encourage whistleblowing, and we will not take any measures against anyone having filed a whistleblowing report, either at the time the report is made, or subsequently.

Reportable behaviour could be:

- Criminal offences like fraud, money laundering, bribery, and corruption
- Failure to comply with a legal or regulatory obligation
- Actual or potential conflicts of interest
- Accounting misstatement
- Inaccurate, misleading, or fraudulent reporting of key risks
- Price fixing, market abuse, or insider trading
- Concealing or destroying evidence of wrongdoing
- Behaviour that harms or is likely to harm SEB LI's reputation or financial well-being

Personal grievances that only effect the reporting person in a personal level are not protected by the Act and should be reported to HR. Such matters may be protected under general employment law.

You should not investigate your concerns yourself or try to prove if the concern is well-founded. As soon as you have a genuinely held concern, report it. Any employee knowingly or maliciously raising a concern they know to be untrue may face disciplinary action.

If a person is told not to report a concern, including by a person in authority, the person should not agree to remain silent and if they raise a concern, they will be within the full protections under the legislation.

Processing of personal data related to handling of a report shall be in compliance with the GDPR and any complementary Irish law or regulation. Personal data may only be processed for the purpose of handling of the Whistleblowing report. Only persons that have been designated to receive Whistleblowing reports may have access to personal data processed in a report. Personal data which are not relevant for the handling of a specific report shall not be collected or, if accidentally collected, shall be deleted without undue delay.

The anonymous reporting service 'WhistleB' used by SEB LI meet high security requirements regarding data security and protection of the reporter's identity.

## What to expect when you are filing a whistleblowing report:

1. Acknowledgement of your report will be sent within 7 days.
2. An initial assessment is conducted by the authorised recipient, including seeking further information from the reporting person if required, as to whether there is prima facie evidence that a relevant wrongdoing may have occurred. A decision will be communicated to the reporting person. If you have filed a report, the information provided may be shared with the SEB Group for the purpose of investigation, unless you have objected to the sharing of information.
3. Diligent follow-up is conducted by the authorised recipient.
4. Feedback on actions taken or planned to be taken will be issued no later than 3 months after the acknowledgement date.
5. Further feedback will be issued every 3 months if the case is complex, and the issue is still unresolved.

## What protections are available:

1. Any penalisation that causes disadvantage to a reporting person is prohibited.
2. Penalisation includes dismissal and also any other form of unfair treatment, such as suspension, reduction in wages or hours, demotion, and transfer of duties as well as intimidation and harassment.
3. Penalising a reporting person is a criminal offence and reporting persons are protected from any civil or criminal liability for reporting confidential information, provided it is done so in accordance with the law.
4. Non-disclosure agreements cannot be used to prevent a person reporting a wrongdoing.
5. Employers and regulators must keep the identity of the reporting person confidential.

SEB Group policies adopted by SEB LI on Whistleblowing and Code of Conduct can be found on SEB Group's intranet for employees or on SEB Group's external website [Whistleblowing at SEB | SEB \(sebgroup.com\)](https://sebgroup.com/Whistleblowing).

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<sup>2</sup> (i) An offence has been, is being or is likely to be committed, (ii) a person has failed, is failing or is likely to fail to comply with any legal obligation (including a regulatory obligation), other than one arising under the Discloser's contract of employment or other contract whereby the Discloser undertakes to do or perform personally any work or services, (iii) a miscarriage of justice has occurred, is occurring or is likely to occur, (iv) the health and safety of any individual has been, is being or is likely to be endangered, (v) the environment has been, is being or is likely to be damaged, (vi) an unlawful or otherwise improper use of funds or resources of a public body or of other public money has occurred, is occurring or is likely to occur, (vii) a breach has occurred (as defined in the Protected Disclosures (Amendment) Act 2022), is occurring or is likely to occur, information tending to show any matter falling within any of the preceding paragraphs has been, is being or is likely to be concealed or destroyed or an attempt has been, is being or is likely to be made to conceal or destroy such information.

## Support services:

[gov.ie](http://gov.ie) - Protected Disclosures Act: Information for Citizens and Public Bodies ([www.gov.ie](http://www.gov.ie))

Information about what wrongdoings can be reported as protected disclosures, how to make a protected disclosure and how to obtain protection from penalisation for having made a protected disclosure can be found at [Citizens Information](#). In addition, [Transparency International Ireland](#) run a free [Speak Up Helpline and Legal Advice Centre](#) for people who have made or are considering making a protected disclosure.

## Current regulatory, legislative and compliance requirements<sup>3</sup>:

1. The Protected Disclosures Act 2014 as amended by the Protected Disclosures (Amendment) Act 2022
2. Central Bank (Supervision and Enforcement) Act, 2013
3. The Criminal Justice (Anti Money Laundering and Terrorist Financing) Act 2010
4. The Criminal Justice Act 2011.



<sup>3</sup> (i) Disclosures can, in certain instances, be made directly to the Office of the Protected Disclosures Commissioner. (ii) There is a range of different 'prescribed persons' for the purposes of making disclosures to, such as Central Bank of Ireland.