



Speak-Up Policy Addendum – Germany

Last Update: April 2026



Purpose

This addendum is a supplement to the global Speak-Up Policy of RGA. The provisions included in this addendum apply exclusively to Workforce Members of RGA International Reinsurance Company dac (“RGAI”) in Germany.

In case of any discrepancies between this addendum and the global Speak-Up Policy, this addendum prevails.

What to know

Each Workforce Member has a duty and obligation to speak up upon learning of potential misconduct. In addition to the global Speak-Up Policy the following matters are regarded matters that relate to potential misconduct.

- **A breach or risk of a breach of European Union law**
 - breach of European Union law means an act or omission that is unlawful and relates to the European Union acts and areas falling within the material scope referred to in Article 2 of the Directive (EU) 2019/1937;
 - breach of European Union law means an act or omission that undermines the purpose or application of the rules in European Union acts and policies falling within the material scope referred to in Article 2 of the Directive.
- **An act or omission with regard to which the public interest is at stake in connection with:**
 - a breach or risk of a breach of a statutory regulation or of internal rules that impose a specific obligation and have been established by an employer on the basis of a statutory regulation; or
 - a risk to public health, public safety or the environment, or an improper act or omission that jeopardises the proper functioning of the public services or an undertaking.

A public interest is in any event at stake if the act or omission affects more than just personal interests and is either part of a pattern or structural in nature, or is serious or broad in scope.

In addition to the global Speak-Up Policy, German law provides specific protections for reporting persons.

- **Anti-retaliation protections**
 - Whistleblowers cannot be held civilly or criminally liable for obtaining or accessing information that is reported or disclosed, unless the acquisition of such information itself constitutes a separate criminal offence (sec. 5 HinSchG).
 - Any form of reprisal against whistleblowers is strictly prohibited, including threats or attempts of reprisals (sec. 36 HinSchG). Legal consequences that constitute reprisals, such as termination of employment or transfer due to whistleblowing, are null and void as a violation of a statutory prohibition (sec. 36 HinSchG in conjunction with sec. 134 German Civil Code (BGB)). In this respect, the German Whistleblower Protection Act provides protections that go beyond the requirements of the EU Whistleblowing Directive.
 - Where a reporting person suffers a disadvantage following a report, the disadvantage is presumed to constitute a reprisal, provided the reporting person asserts this in legal proceedings. The employer bears the burden of proving that the measure was based on duly justified reasons unrelated to the whistleblowing (sec. 36 HinSchG).
 - Reporting persons who suffer reprisals may be entitled to compensation for both pecuniary and non-pecuniary losses (sec. 37(1) HinSchG).
 - Agreements that deviate from or limit the protective measures of the German Whistleblower Protection Act are prohibited and invalid (HinSchG).

- Protection applies regardless of whether the reported information subsequently turns out to be true, provided the report was made in good faith. Reporting persons who intentionally or with gross negligence report false information are not protected and may be liable for damages (sec. 38 HinSchG).

What to Do

Each Workforce Member has a duty and obligation to speak up when they have a suspicion of abuse. There are multiple ways to report a suspicion of abuse:

- You can make a report to the RGAI Head of Compliance, verbally or in writing. If you choose to do so in writing, please send an email to Nigel.Ennis@rgare.com
- Your Line Manager, verbally or in writing.
- Your HR representative.
- RGA Speak Up Hotline or email address detailed below.
- Would you prefer to make your report orally? Then you can call the RGAI Head of Compliance via Teams, Your HR representative via Teams, your line manager in person or via Teams or the RGA Speak-Up Hotline at 0800-022-9111 (after the prompt, dial 855-409-0020).

Your report will be assessed by the RGAI Head of Compliance and the RGA Chief Compliance Officer. Confidentiality is mandatory for the officer(s). This means that your identity will not be disclosed to others without your consent, and that they will not discuss the report unnecessarily.

Confidential advisor

You have the right to consult a confidential advisor about making a report. The confidential advisor for RGA is the RGA Speak Up Hotline. To contact the Speak-Up Hotline, visit <http://bit.ly/RGASpeakUp>, or call 0800-022-9111 (after the prompt, dial 855-409-0020). Of course, you are free to seek advice from an external advisor. You may choose to make a disclosure to the competent German external reporting authority. For insurance organisations, Section 21 of the German Whistleblower Protection Act (HinSchG) designates the German Federal Financial Supervisory Authority (BaFin) as the competent external authority. You may also choose to make a Protected Disclosure to the Central Bank of Ireland, consistent with the EU framework.

<https://www.centralbank.ie/regulation/protected-disclosures-whistleblowing>

Terms

Within seven days of submitting your report to your chosen contact, RGAI Head of Compliance, RGA Speak Up Hotline, Your Line Manager or HR representative, you will receive an acknowledgment of receipt. No later than three months after receiving the acknowledgment of receipt, you will be informed of the assessment of your report by the RGAI Head of Compliance. If no further action will be taken, you will also be informed, and the reasons for this decision will be provided.