



Speak-Up Policy Addendum – Poland

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 (“RGA”) in Poland.

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, Polish law provides specific protections for reporting persons.

- **Anti-retaliation protections**
 - Polish law prohibits retaliation against whistleblowers who report violations, including dismissal, demotion, salary reduction, or other adverse actions related to employment (Articles 11 and 12).
 - Where retaliation is alleged, the burden of proof rests with the employer to demonstrate that any adverse action was not taken in response to the report (Article 12(3)).
 - Whistleblowers are entitled to confidentiality, and their identity must be protected throughout internal and external reporting processes (Articles 8, 27, and 43).
 - Whistleblowers who suffer retaliation may be entitled to compensation, including statutory minimum compensation, and are protected from liability for damages where they had reasonable grounds to believe the report was necessary (Articles 14 and 16).
 - Whistleblowers may obtain a certificate confirming their protection, which may be used to secure interim relief (Article 38).
 - Whistleblowers who make public disclosures may be protected where specific conditions are met, including where internal and external reporting channels have failed or where there is an imminent risk to the public interest (Articles 51–52).
 - Individuals who engage in retaliatory actions against whistleblowers may be subject to criminal

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).
- You may choose to make an external report without first making an internal report (Article 30(1)) to the competent public body in Poland.

- **Reporting to the Ombudsman (Rzecznik Praw Obywatelskich)**

The Ombudsman is one of the authorities competent to receive external reports (Article 30(2)). The Ombudsman carries out a preliminary verification of reports and, where the matter falls outside the Ombudsman's jurisdiction, forwards it to the relevant public body for further action (Article 31). The Ombudsman may also issue a certificate confirming whistleblower protection where required (Article 38).

- **Reporting to other competent public bodies**

Where appropriate, reports may be made directly to the relevant public authority, depending on the nature of the alleged violation (Article 30(2)), including:

- Urząd Ochrony Konkurencji i Konsumentów (UOKiK) – unfair competition or consumer protection matters;
- Komisja Nadzoru Finansowego (KNF) – financial services, including insurance and reinsurance activities;
- Urząd Ochrony Danych Osobowych (UODO) – data protection and GDPR breaches;
- Państwowa Inspekcja Pracy (PIP) – labour law, workplace safety, and employment rights;
- Prokuratura – criminal offences such as fraud, corruption, or other illegal acts.

- You may also choose to make a Protected Disclosure to the Central Bank of Ireland, consistent with the EU framework.

Your internal 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.

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.