



# Speak-Up Policy

Last Update: December 2024



## Purpose

The objective of the Speak-Up Policy is to provide a consistent mechanism for reporting and investigating suspected violations of law, rule, regulation, internal policy, or the Code of Conduct across Reinsurance Group of America, Incorporated and all of its subsidiaries and affiliates (“**RGA**”). The Speak-Up Policy aims to:

- **Ensure** all Workforce Members and other persons dealing with RGA feel supported in speaking up and reporting matters they suspect may involve improper, unethical, or inappropriate conduct;
- **Encourage** all improper, unethical, or inappropriate behavior to be identified and challenged at all levels of the RGA organization; and
- **Reinforce** RGA’s Non-Retaliation Policy through the assurance that all reports will be taken seriously, treated as confidential to the extent permitted by law, and managed without fear of retaliation.

## Scope

The Speak-Up Policy applies globally to all Workforce Members throughout RGA. “**Workforce Members**” include any regular or temporary employee, intern, contingent worker, contractor, consultant, or individuals representing or acting on behalf of RGA. The policy also extends to any party of a current or prior relationship with RGA (including, but not limited to, former Workforce Members, family members of Workforce Members, employment applicants, shareholders, vendors, and customers) who wish to raise a concern about possible misconduct within RGA.

## What to Know

Each Workforce Member has a duty and obligation to speak up upon learning of potential misconduct. RGA encourages you to reach out to your direct supervisor as your first point of contact as they are often in the best position to understand your specific concern and take the appropriate action. In some jurisdictions, (e.g., the United Kingdom), a protected disclosure can also be made to local regulators.

If you are not comfortable reporting a potential violation to your direct supervisor or another leader, RGA offers the Speak-Up hotline as an option.

Managed by a third-party reporting service, the Speak-Up hotline is a comprehensive reporting tool to assist management and employees in addressing fraud, policy violations, and other misconduct in the workplace, all while cultivating a positive work environment at RGA.

- **Confidentiality** Any information you provide to the Speak-Up hotline will be treated as confidential to the extent allowed by local law and regulation. All workplace concerns are handled with discretion and sensitivity. Therefore, if you participate in or learn about an investigation, you must keep the matter confidential.
- **Anonymity** Where allowed by local law, you may choose to remain anonymous when speaking up. If you request anonymity, we will not reveal your identity and will take all reasonable steps in any investigation to reduce the risk of you being identified. However, if possible, we encourage you to reveal your identity as in some circumstances, it can be challenging to investigate reports that are made anonymously.

### How to Speak Up:

- In Person by speaking with your direct supervisor, another leader, Global Human Resources, Global Ethics and Compliance, or Global Legal Services
- By Phone or Online by visiting the [Speak-Up hotline](#) website for information on both options

- **No Liability** You shall not be subject to any civil, criminal, or administrative liability (including disciplinary action) and no contract right will be exercised against you for speaking up about a concern or potential violation.
- **Investigations** Any investigations shall be conducted in a fair and unbiased manner concerning all parties involved. Details of the case, your identity, and the identity of anyone else mentioned in the report, are only shared on a need-to-know basis in accordance with all relevant and applicable laws. You should never withhold, tamper with, or fail to communicate relevant information in connection with an investigation.
- **Non-Retaliation** Speaking up is encouraged, and individuals who speak up are protected. You should feel confident that you will not suffer as a result of raising concerns in good faith about suspected misconduct. No form of threat or retaliation will be tolerated. Retaliation is treated as a disciplinary matter. You will not be protected, however, if you maliciously raise a concern that you know is false. For more information about RGA's position on non-retaliation, please refer to the **Non-Retaliation Policy** available on the Policy Portal.

## What to Do

We all must speak up if we witness or suspect a violation of law, rule, regulation, RGA policy, or the Code of Conduct. By speaking up, you provide RGA the opportunity to deal with the issue appropriately.

If you believe you are being asked to act illegally or improperly, you are required to speak up. Remaining silent about possible misconduct may allow a situation to worsen and may lead to an increased risk of financial and reputational loss to RGA caused by the misconduct.

Examples of potential violations or concerns which should be reported include, but are not limited, to the following:

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| ▪ Discrimination or harassment                       | ▪ Disclosure of confidential information              |
| ▪ Misstatement of financial or non-financial Records | ▪ Violation of applicable laws, rules, or regulations |
| ▪ Bribery, corruption, or kickbacks                  | ▪ Violations of RGA policies or Code of Conduct       |
| ▪ Conflicts of interest                              | ▪ Improper use of RGA's information assets            |
| ▪ Insider trading                                    | ▪ Environmental, health, and safety Issues            |

**Disclaimer:** Due to local privacy and whistleblower laws in individual countries, your Speak-Up hotline may be programmed to only permit **specific** types of reports such as accounting, financial, audit, and bribery matters. In these countries, you may contact a member of Human Resources or Global Ethics and Compliance to report other types of issues.

Workforce Members should act in good faith by providing all of the information they have and believe to be true. If you become involved in an investigation, you must answer all questions thoroughly and honestly.

## What to Avoid Reporting

- **Immediate Threats to Life or Property** If emergency assistance is needed, please contact your local authorities or call your country's emergency phone number.
- **Wage and Salary Issues** File any employment grievances about your wage or salary with the proper Human Resources contact.
- **False Reports** Workforce Members must report concerns honestly and in good faith. False accusations and lies are a policy violation and may lead to disciplinary action, leading up to and including termination.
- **Attempted Exemption by Self-Reporting** Workforce Members cannot exempt themselves from the consequences of misconduct by self-reporting.

## Questions and Concerns

For specific guidance on speaking up, please contact the groups or individuals identified below:

Topic	Group/Individuals	Contact Information
Report concerns or potential violations	RGA Speak-Up hotline	<a href="#">RGA Speak-Up Website</a>
Laws, regulations, internal policies, treaties, and other contractual obligations	Global Ethics and Compliance (GEC) RGA Legal Counsel	<a href="mailto:compliance@rgare.com">compliance@rgare.com</a>
Human Resource related questions and concerns	Human Resources Department	Human Resources Representative

## Appendix

### Definitions of Terms

**Bribery** Giving money or some other valuable item to improperly influence a public official (i.e., any governmental employee) or commercial partner in the performance of their duties to obtain or retain a business advantage. This includes receiving money or some other valuable item from a commercial partner to improperly influence a Workforce Member in the performance of their duties or retain the commercial partner's business.

Examples include:

- cash payments
- charitable donations and sponsorships
- political party and candidate contributions
- loans
- travel and entertainment expenses or covering or reimbursing another person's expenses

- gifts or business promotional activities
- job placements or other benefits to a family member or friend of a government official or commercial partner

**Conflict of Interest** Any act or circumstance that could, or could appear to, cast doubt on a Workforce Member's ability to act with total objectivity in conducting RGA business.

**Corruption** Wrongdoing on the part of an authority or powerful party through means that are illegitimate or incompatible with ethical standards and is associated with bribery.

**Discrimination** Unequal treatment of individuals for reasons that have nothing to do with ability. Federal and state laws prohibit discrimination in employment, rates of pay, right to promotion, etc. based on race, nationality, creed, color, age, sex, or sexual orientation.

**Harassment** Any words or actions that create an intimidating, hostile, or offensive work environment.

**Insider Trading** Use of confidential, non-public information about a business gained through employment in a company to buy and sell stocks and bonds based on the private knowledge that the value will go up or down in the future.

**Kickback** A form of corruption that involves two parties agreeing that a portion of sales or profits will be improperly given in exchange for making a business deal.

**Workforce Member** Any regular or temporary employee, contingent worker, contractor, consultant, or individuals representing or acting on behalf of RGA.

## Policy Information

Document Information	
<b>Current Version Number</b>	6.0
<b>Policy Owner</b>	Juanita Petit, VP, Compliance Governance
<b>Policy Manager</b>	Beth Dean, Director, Compliance Core Services
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Version Number	Version Author(s)	Version Notes	Date of Version Approval
6.0	Beth Dean	Reviewed during the two-year review cycle; expanded scope of policy to include interns and employment applicants, to accommodate new requirements in Spain for whistleblowing policies.	December 2024
5.0	Beth Dean	Reviewed during the two-year review cycle; minor grammatical changes applied.	May 2022
4.0	Beth Dean	Reviewed during the two-year review cycle; minor changes applied.	June 2020
3.0	Lee Emmenderfer	Minor updates made to the policy to comply with Australia's Treasury Laws Amendment (Enhancing Whistleblower Protections) Bill 2018.	June 2019
2.0	Lee Emmenderfer	Inclusion of text informing reader of option for reporting to local regulators in certain jurisdictions.	January 2019
1.0	Lee Emmenderfer	Initial Draft of Speak-Up Policy	June 2018