



Doing the Right Things Right

FWD Code of Ethics and Business Conduct

2020

Get ready to live



Introduction from CEO



At FWD, we are in the business of insurance. To put it simply, we help our customers alleviate their financial worries and plan for their future. Every transaction that we make affects people's lives by enabling their financial sustainability, and with that knowledge comes great responsibility. To remind us that everything we do at FWD should be measured against high ethical standards, we present Doing the Right Things Right – FWD's Code of Ethics and Business Conduct.

"Simply put, at FWD, we Do The Right Things Right."

Our Code is more than just a set of rules. It is the principles that guide our day-to-day work as employees, appointed officers or partners such as agents or contractors of a reputable and trusted insurer in Asia. It addresses the expectations that we have for each other, as well as the high ethical standards that our customers and the public expect from us.

Simply put, at FWD, we Do The Right Things Right. In every situation we encounter, we must remember this saying and consider how it should guide our actions every day.

I encourage you to read this Code, uphold both its spirit and the letter, and consider the impact of our actions on our customers, stakeholders and each other. Our commitment to the Code will help us to build an even better FWD, attracting the best talent, valuable partners and loyal customers.

Most important of all, remember that you are not alone in the pursuit of ethical conduct. Your colleagues and managers are there to support you. If you have a question or any concerns about how to handle any situation, please reach out to the resources identified in this Code. All concerns and disclosures are held in strict confidence.

Best Regards,

A handwritten signature in black ink, appearing to read 'Huynh Thanh Phong'. The signature is stylized with a large, sweeping initial 'H' and 'P'.

Huynh Thanh Phong
Group Chief Executive Officer
FWD Group

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FWD's Guiding Principles

By **Doing The Right Things Right**, we can ensure FWD's continued success and uphold our reputation and brand. Regardless of our individual role in the company, whether we are directors, officers, managers, employees or FWD partners such as agents or contractors, we are expected to always Do The Right Things Right.

Underpinning this Code are our Five Guiding Business Principles: By embracing these principles on a daily basis, we can consistently Do The Right Things Right.



1

Honesty and Integrity

2

Be Informed and Act Responsibly

3

Open and Clear

4

Professionalism and Respect

5

Socially and Environmentally Responsible

FWD's Guiding Principles

Honesty and Integrity

Acting with honesty and integrity means that you:

- Follow all laws and regulations applicable to our business
- Deal with colleagues, customers, stakeholders and business partners with trust, respect and common courtesy
- Consider and do what is fair and ethical in all circumstances
- Refrain from putting personal interests above the company or our customers
- Do not tolerate dishonest or unethical behaviour from anyone.

1

Be Informed and Act Responsibly

Being informed and acting responsibly means that you:

- Carry out your duties with pride
- Are familiar with and understand the legal and compliance requirements of your role by completing all compliance training
- Take the time to be familiar with the policies and procedures that relate to your particular role and always act within your authority
- Meet and exceed company and managerial goals in a respectful and legal manner
- Refrain from abusing your position for personal gain.

2

Open and Clear

Conducting your work in an open and clear manner means you:

- Treat customers, partners and each other fairly
- Communicate transparently
- Present our products and services objectively, providing clients with a complete picture of the key features, benefits, exclusions and risks
- Never exaggerate or withhold information from customers, regulatory authorities or each other
- Provide reports and information to requesting parties when legally obligated to do so
- Raise concerns about possible fraudulent or unlawful activity to your manager and to the Compliance department.

3

Professionalism and Respect

Acting with professionalism and respect means you:

- Promote a workplace rich in diversity, where people of all backgrounds, race, colour, religion, gender, age and disabilities are accepted and embraced
- Encourage innovation, ideas and improved ways of doing our work, but never at the expense of doing the right thing by our customers and each other
- Do not tolerate bullying or harassment.

4

Socially and Environmentally Responsible

Being socially and environmentally responsible means you:

- Manage our business activities responsibly, to avoid negative impact on those around us and the environment
- Give back to the local community by supporting charities and causes that make a difference.

5

A group of people at a party wearing colorful, fun sunglasses and holding bouquets of flowers.

Introduction

to our Code

We have developed this Code as a source of guidance and to our commitment to building a strong risk culture based on a standard of ethical and transparent culture, as well as promoting sound overall governance, risk management and fair treatment of customers.

While no Code can cover every situation or challenge that we might encounter, we hope that the principles explained here will provide you with the guidance to make an informed decision in circumstances requiring ethical judgement.

This Code applies to:

- All FWD companies
- All FWD permanent, part-time, temporary and contract employees
- All FWD directors, officers, supervisors and managers, Agents and distribution partners are expected to abide by the spirit of this Code and any applicable contractual provisions when carrying out their obligations under their contracts with FWD. Other third party business partners such as suppliers and contractors are also expected to abide by the spirit of this Code and to any applicable contractual provisions when performing services for or on behalf of FWD.



Your Personal

Commitment

You will be given access to this Code when you commence your employment or appointment with us and will be asked once per year to complete an online assessment and re-acknowledge your awareness of the Code and its contents. The Code needs to be read in conjunction with the more detailed policies at a Group or country level.

If you fail to comply with the standards contained in this document you may be subject to disciplinary action up to and including dismissal, and possibly face legal penalties. This is why it is important to read the Code carefully and ensure that you understand its contents.

Leadership Responsibilities

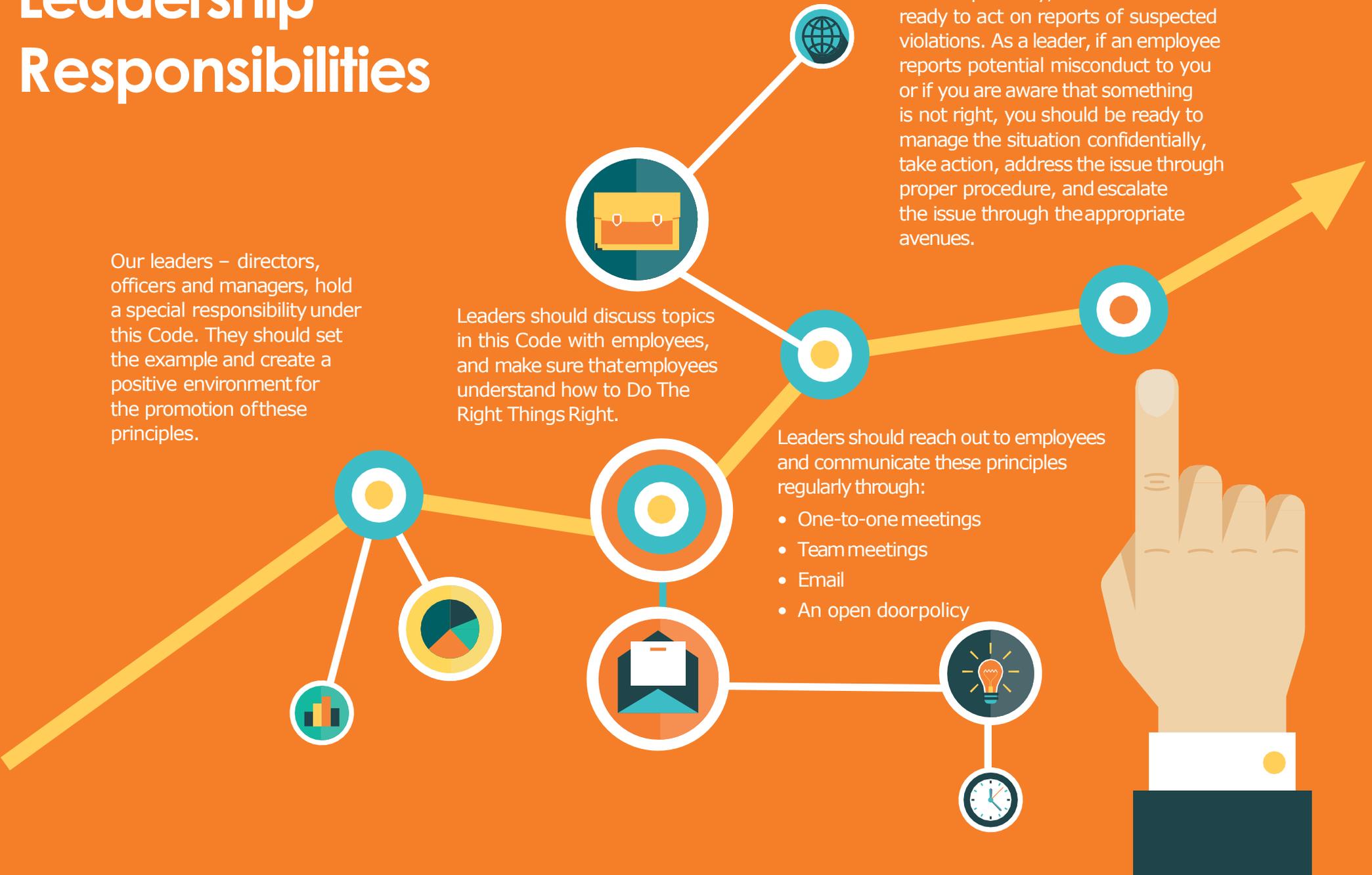
Our leaders – directors, officers and managers, hold a special responsibility under this Code. They should set the example and create a positive environment for the promotion of these principles.

Leaders should discuss topics in this Code with employees, and make sure that employees understand how to Do The Right Things Right.

Most importantly, leaders should be ready to act on reports of suspected violations. As a leader, if an employee reports potential misconduct to you or if you are aware that something is not right, you should be ready to manage the situation confidentially, take action, address the issue through proper procedure, and escalate the issue through the appropriate avenues.

Leaders should reach out to employees and communicate these principles regularly through:

- One-to-one meetings
- Team meetings
- Email
- An open door policy



Where to go for help?

A culture of honesty includes our ability to speak up when we feel that something is wrong.

We take every effort to keep reports confidential and operate on a basis of non-retaliation. We will never retaliate against someone for making a disclosure to us and we do not tolerate retaliation against someone who makes a report in good faith.



You can report violations or express concerns through a variety of avenues:



- By phone – Calling the independent third party Concern Hotline:
China – 400-120-0253
Hong Kong – 800-903-375
Indonesia – 021-29223057
Japan – 0800-100-0081
Macau – 6262-5093
Malaysia - 1548770361
Philippines – 2-86263210
Singapore – 3158-7652
Thailand – 021056128
Vietnam – (028) 44581010



- URL: [Concern Online](#)



I. Honesty

and Integrity



1 Honesty and Integrity

Acting with honesty and integrity means we follow all applicable laws and do what is fair and right, while never putting our personal interests before the company's goals. We are expected to act with common courtesy in all of our business dealings.

Our success is the result of the hard work and dedication of our people. We reject bribery and corruption as a way of building our business.



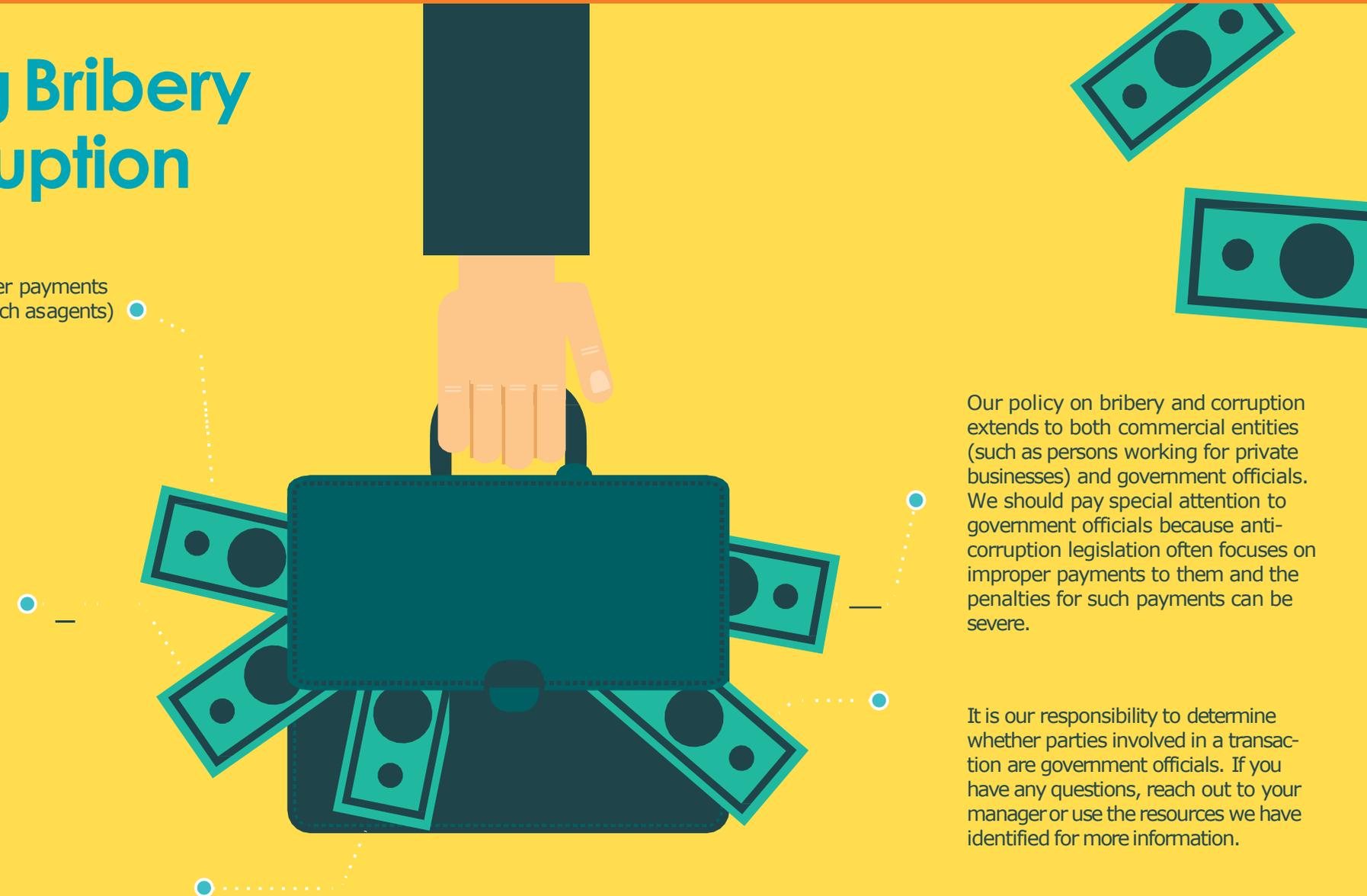
Bribery and corruption are prohibited by several laws applicable to FWD including: the Prevention of Bribery Ordinance (Hong Kong), the Penal Code (Thailand) and the Anti-Graft and Corruption Practices Act (Philippines). You should also follow the policy in place in your country.

Anti-corruption laws prohibit us from offering, giving or receiving anything of value to gain an improper business advantage. This means that you cannot provide anything - including expensive gifts, cash, lavish meals or entertainment, excessively favourable discounts or terms, and similar items, to gain an improper business advantage.

Rejecting Bribery and Corruption

We also cannot make improper payments through business partners (such as agents) or other intermediaries.

We are prohibited from making facilitation payments, which are unofficial payments made to speed up, obtain or secure an obligation that is already owed to us. For example, if we are awaiting approval from a bank on a wire transfer of funds from a customer account, we cannot offer an improper payment (no matter the value) to speed up or secure that payment.



Our policy on bribery and corruption extends to both commercial entities (such as persons working for private businesses) and government officials. We should pay special attention to government officials because anti-corruption legislation often focuses on improper payments to them and the penalties for such payments can be severe.

It is our responsibility to determine whether parties involved in a transaction are government officials. If you have any questions, reach out to your manager or use the resources we have identified for more information.

Many times, it can be difficult to identify who qualifies as a government official. Individuals holding public positions, such as heads of government departments and ministers, are not the only government officials we should be aware of. Individuals working for any entity owned or controlled by a government are also considered government officials and any improper payments to them are still violations of the law.

Political and Charitable Contributions



As a reputable insurance company in Asia, individuals may look to us to provide political or charitable contributions for a variety of causes. We cannot support these causes using FWD funds, resources or assets, or with reference to FWD's name without prior approval.

While contributing to political and charitable causes can be a worthy endeavour, a donation can turn into an underhanded bribe when given in a business setting or when related to an FWD transaction.

You may provide these types of contributions using your own funds and resources, without reference to FWD's name, as long as the contribution is not related to gaining a business advantage for FWD.

Q&A

Question: Sandra is working to set up a new office in The Philippines for FWD's operations. She is working with the local government to obtain the necessary permits and services to get everything in order. A government worker in charge of the utilities (water, electricity, telephones, etc.) says, "If you want this new office, you are going to need my help and I'm only going to do that if I get USD\$1,500 cash for my time." She is aware of certain set-up fees for the services but this seems suspicious. Sandra wants to get the new office set up soon but thinks this could be a bribe, what should she do?

Answer: Sandra should not make the payment and report the request from the government official to her manager and the Compliance department. The payment is highly suspicious as it was requested in cash, doesn't seem to be a normal fee and most likely qualifies as a facilitation payment. We want to get the job done but only if we Do The Right Things Right and paying bribes does not allow us to do that.

Gifts and Entertainment

Exchanging common business courtesies are an essential part of building strong working relationships with our business partners and customers. We should make sure that the gifts and entertainment we provide do not amount to bribery or give the appearance that we are exchanging courtesies to gain any improper business advantage.

**GIFTS AND
ENTERTAINMENT
ARE PERMITTED
WHEN THEY ARE:**

01

Exchanged as part of the promotion or demonstration of one our products or services

02

Of nominal value
(not lavish or overly expensive)

03

Infrequent

04

Unsolicited

05

Reasonable

Gifts and Entertainment

ACCEPTABLE GIFTS INCLUDES:

FWD promotional items For example, calendars, pens, coffee mugs, etc.



Inexpensive souvenirs small gift items



Tickets to modestly priced events



Inexpensive food items



Inexpensive meals and drinks



Cash gifts of low or nominal value given as part of a cultural or national holiday



Such as Chinese New Year, and not given to or received from the same person more than once during a particular holiday

PROHIBITED FORMS OF GIFTS AND ENTERTAINMENT INCLUDE:

Lavishly priced gifts



Expensive meals and drinks



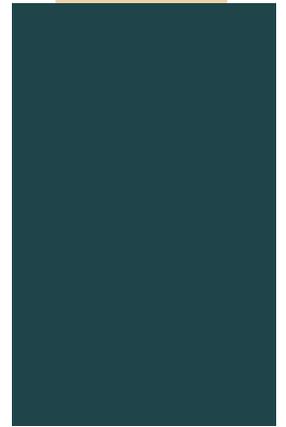
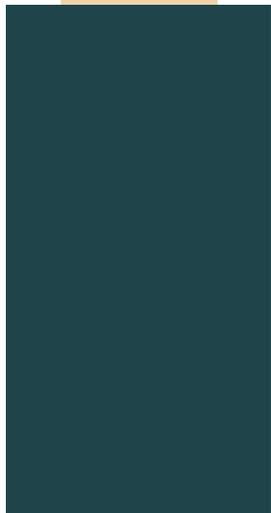
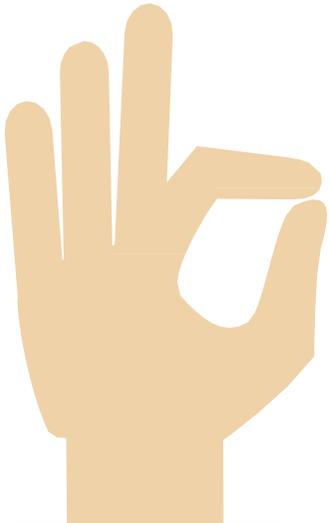
Gifts / entertainment exchanged frequently with the same person or entity



Attendance at "adult-only" establishments



Such as gentlemen's clubs, gambling venues, nightclubs and spas



Am I doing the right thing?

Use your best judgment when giving gifts or entertainment and follow the policy in place for your business

Think about whether the gift or entertainment is being exchanged to influence a person's decision or create a sense of obligation.

If yes, then that gift or entertainment could be a bribe or create the appearance of corruption and is against our Code and the law.

If refusing a gift or entertainment is not possible or feasible, or if refusal would be highly offensive to the person offering the benefit, accept the gift or entertainment and report the incident to the Compliance department.

In the case of gifts, you will also need to surrender the gift to the appropriate department in accordance with your local policy.

[More information can be found in the FWD Gifts, Entertainment and Anti-Bribery Policy](#)

Q&A

Question: One of our brokers we have worked with for a long time has sent Stephen, a FWD employee, an expensive bottle of wine and a designer watch as a "thank you" for their many years of successful business. Stephen estimates that the total value of the gifts is about USD\$500. Can he keep these gifts?

Answer: No, Stephen should not accept the gifts. The gifts that are being offered to Stephen are lavish, not reasonable and could affect his decision making process about working with the business partner in the future. He should politely decline the gifts, inform the business partner that such gifts are against FWD's policies and this Code and report the incident to the Compliance department.

Q&A

Question: Linda, an FWD agent, has been working with one of her customers for many years and enjoys their good working relationship. The holidays are coming up and Linda wants to send her customer a card and a promotional calendar to thank her for her business and also as a way to promote the FWD brand throughout the year. Is it okay for Linda to send these to her client?

Answer: Yes, a simple card and promotional calendar are reasonable gifts that will promote our services and products. Providing gifts of low value around the holidays can be a good way to increase the visibility of the company and stay in touch with our valued customers.

Conflicts of Interest

Fulfilling our clients' needs and meeting our stakeholders' expectations requires our full attention on a daily basis. To maintain our dedication, we need to avoid conflicts of interest that could limit our ability to carry out our responsibilities for FWD.

Personal Conflicts of Interest

Working for FWD's competitors is a conflict of interest because your loyalty is divided between both companies and you may experience a clash of interests on a variety of matters.

In addition, working for a competitor limits your time to conduct work for FWD and creates a risk that business and products plans, or other confidential information could be revealed.

Serving as a director of a competitor or holding significant financial interest in a competing organisation presents these same sorts of risks and could also qualify as a conflict of interest.

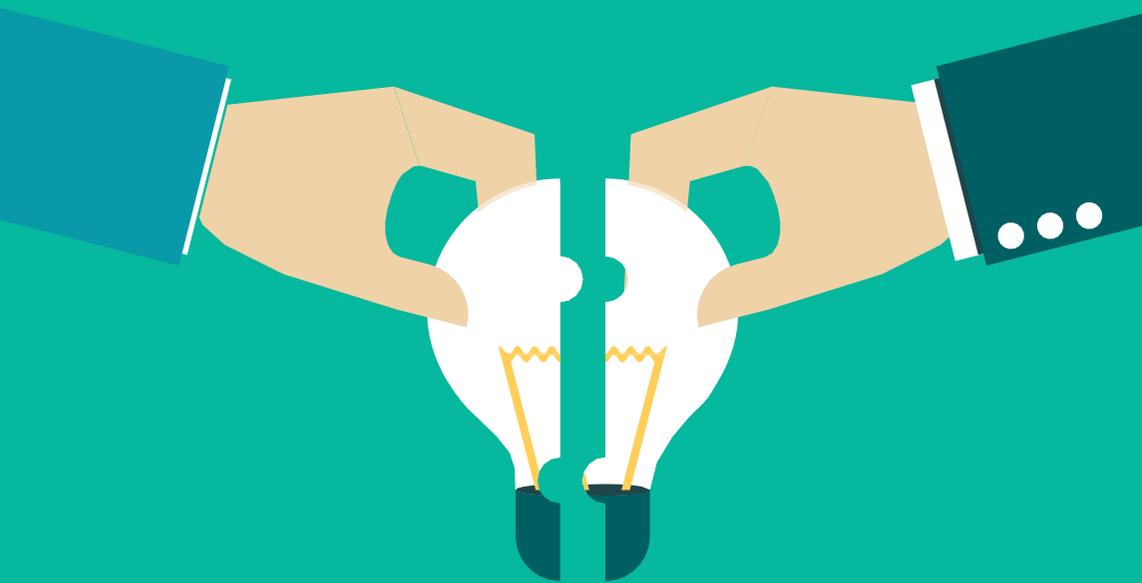


Hiring relatives to work for FWD is not prohibited but relatives must be evaluated and considered under the same process and criteria as other candidates. If you have a relative that is interested in working for FWD, speak to the HR department about them and they will instruct you on the appropriate next steps.

Steering business to specific agents or business partners can also be a conflict of interest, especially if the agent or business partner is related to you, has a relationship with you outside of work, or is a company you hold an interest in.

If you know of an agent or business partner that FWD should consider for an engagement or transaction, ensure that they undergo the same review process as every other potential third party.

Corporate Opportunities



Corporate opportunities are business opportunities that a person encounters as an employee of FWD. You cannot take these opportunities to enrich yourself personally, unless FWD has informed you that the company will not be pursuing the opportunity and has consented to you taking the opportunity.

Disclosing a Conflict of Interest

If a situation or opportunity arises that could potentially cause a conflict of interest to your role as a FWD employee, you must disclose the conflict of interest to FWD.

Disclosing a potential conflict of interest does not necessarily mean that FWD will bar you from engaging in an activity. Rather, disclosure provides us with a chance to review the particular circumstances and communicate with you on whether you can safely pursue the situation or opportunity.





Am I doing the right thing?

Q&A

Question: We have a need for office cleaning services and I think my brother would be a great candidate for the job. He is a hard worker, has experience and is looking for a new job. However, I don't want to create a conflict of interest by suggesting him to the HR department, what should I do?

Answer: Hiring a family member is not always a conflict of interest. In fact, relying on personal referrals for hiring qualified partners is a valuable asset to FWD. However, before your brother can be hired you would need to remove yourself from the decision-making process so it doesn't appear to others that he is getting preferential treatment. He still needs to win the job based on the quality of his work and merit; not on personal relationships. Mention him to the HR department and they will take the next steps.

[More information can be found in the FWD Conflicts of Interest Policy](#)



Respecting

Intellectual Property

A part of doing business with integrity means respecting the intellectual property of others. Intellectual property relates to a variety of confidential information possessed by our competitors and external parties.

Intellectual property includes but is not limited to:



01 Business Plans



02 Pricing Information



03 Market Research



04 Copyrighted Information
such as software, images,
publications and notes

Respecting intellectual property rights means you only gather information through legal and ethical means.

Gathering Information about Competitors Properly

We should only gather information about competitors through publically available sources.



Am I doing the right thing?

If you happen to come into contact with a competitor's confidential information by way of a non-public source, you should not use the information. While it may seem beneficial to FWD, we are committed to only doing business honestly and with integrity.

If you have any questions on whether certain information you have can be used, please seek advice from the Compliance department.

Respecting Copyrights

In addition to gathering information properly, we should only access information and materials that we have a right to use.

For example, when putting marketing materials together, we can only use images that we have a license to use, such as pictures from our company image bank.

The same is true for the software that we use on our computers and music we use in commercials and videos.

If you have any questions regarding whether certain information or materials can be used for FWD business, please contact your manager.

Am I doing the right thing?

Q&A

Question: Mike is working on FWD's internal network when he notices a strange folder called "Songs and Programs". He opens the folder to find that there are hundreds of songs, images, movies and a few programs that appear to be downloaded without permission. What should Mike do?

Answer: Mike should let his manager and the Compliance department know about what he found. It appears that someone has violated copyright laws by downloading materials without properly paying for them. At FWD, we only use materials (such as music, pictures and software) that are obtained legally and with permission of the copyright holders.

2. Be informed and

act responsibly



2 BE INFORMED AND ACT RESPONSIBLY

Being informed and acting responsibly means we do our jobs with pride, meet and exceed company and managerial goals in a respectful, legal and ethical manner, and refrain from abusing our position for personal gain. This also means that we don't need to try and know everything and be perfect but instead ask questions when we aren't sure what to do.

Financial Economic Crime

At FWD, we specialise in insurance and financial products that can assist individuals, families and companies in many ways. Having a versatile set of products also means that we will attract a diverse group of customers.

While our customers are honest individuals and reputable organisations, and seek use of our products for sincere purposes, some potential customers may attempt to utilise our products and services for illegitimate reasons such as to launder money or finance terrorism.

In other instances, they may attempt to pay for our products or any associated fees (such as premiums) through wire transfers or other forms of payment made by sanctioned or blacklisted individuals or entities.

To guard against this we should gain all possible information about a customer and make responsible decisions as to which customers we are comfortable working with. The following sections provide more information on these risk areas.

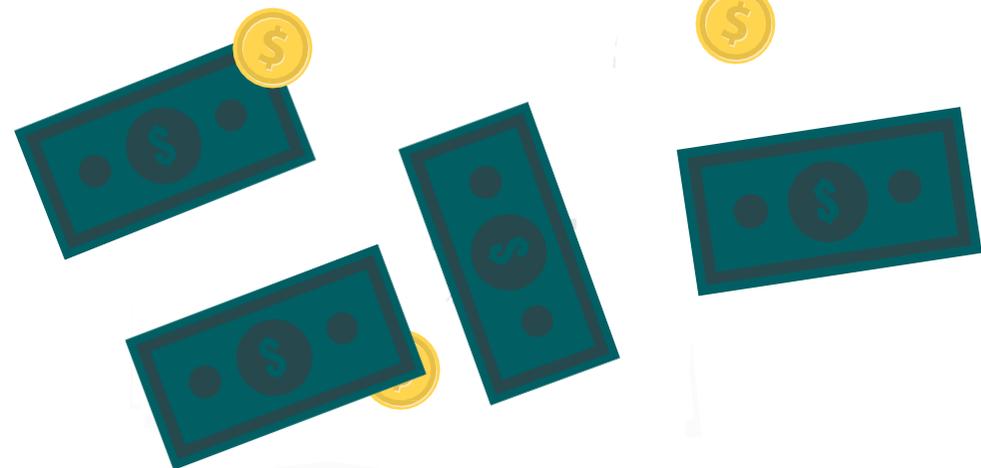
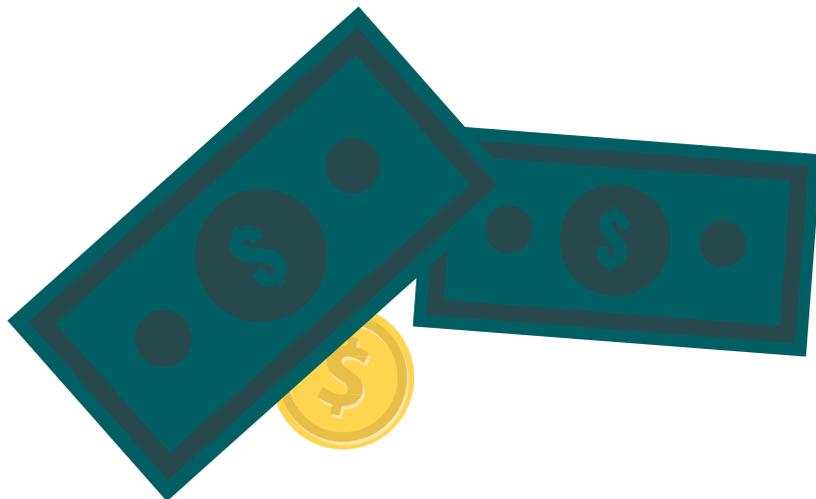


Recognising and Avoiding Money Laundering

Money laundering is the process of transferring illegally obtained money through legitimate avenues, to conceal the original source of the money. For example, someone profiting from illegal drug trafficking may place earnings in an investment scheme to hide the fact that the earnings were originally made from illegal drug sales.

As an insurance company, we need to ensure that our customers are not buying or investing in our products with illegally obtained funds as a way to launder money. We must take time to learn who our customers are, how they have earned their wealth and acquire background information on why they are interested in our products.

Failure by us to identify customers planning to utilise FWD services to launder money could lead to FWD being held responsible for assisting in these crimes. Penalties for violation of anti-money laundering laws are severe.



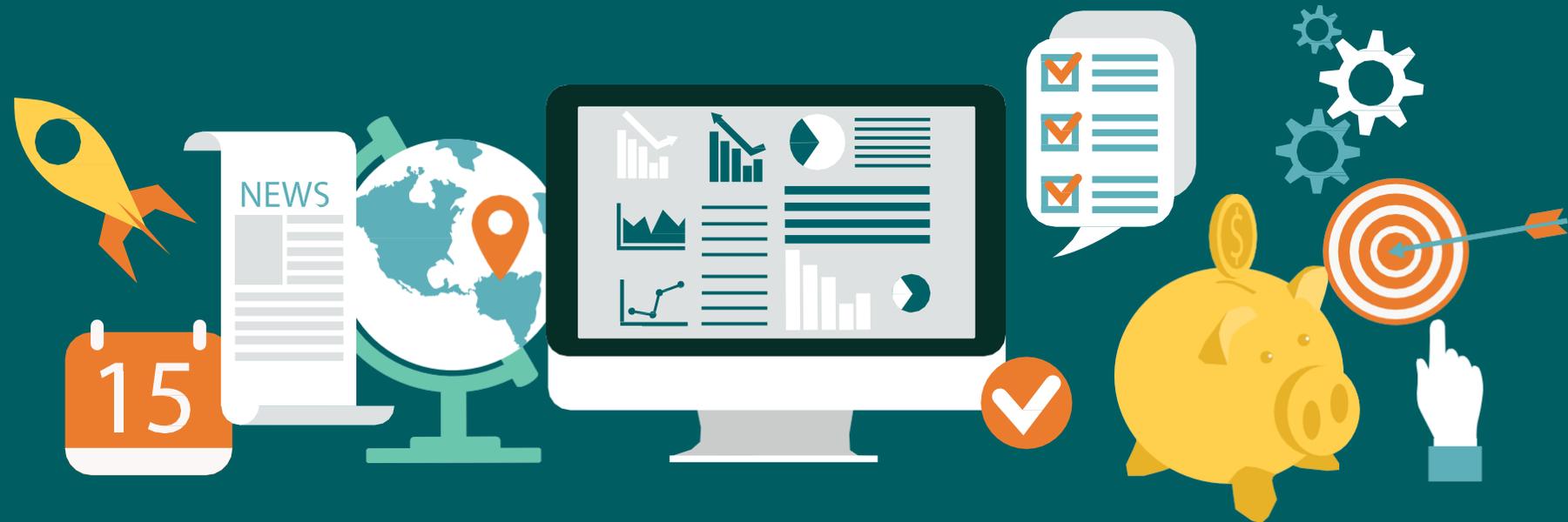
Counter-Terrorist Financing

Another risk we should be aware of is customers using our products and services to finance terrorist groups.

Governments are constantly checking to see how terrorists finance their schemes and as a result terrorists are always searching for new, underhanded ways to support their causes.

Investing in insurance products is one way terrorists covertly finance their causes. As a reputable Insurer, we do not want to serve such customers or be associated with them in any way.

Just as with money laundering, we need to learn about who our customers are. We should find out as much information as possible about who the insurance products and pay-outs are benefitting.



Economic Sanctions

Beyond money laundering and terrorism concerns, we want to ensure that our customers, their intended beneficiaries and payees are not sanctioned or blacklisted entities.

Most countries possess lists of individuals and organisations that should not be dealt with for a variety of reasons, such as operating out of a sanctioned country, past criminal history, human rights violations, etc.

It is our responsibility to determine whether customers or their related parties are sanctioned or on any watch lists.

Dealing with listed individuals or organisations is a violation of international economic sanctions regulations and carries heavy penalties for FWD and our employees.



Know Your Customer (KYC)

To learn more about our customers, their background, intended beneficiaries and other concerns, we employ a know-your-customer (KYC) process. The KYC process begins immediately after making contact with a prospective client and continues on throughout the sale.

The KYC process seeks to identify the following kinds of information:



The customer's background and nationality

The source of their revenue or income

The source of intended premium payments, if any

The beneficiary's identity and nationality

This is not an exhaustive list. If you need guidance on carrying out the KYC process, seek guidance from your manager and the Compliance department.



Am I doing the right thing?

Q&A

Question: A customer has just purchased a high-value insurance policy. However, just a few days later, the customer asks for a refund and to cancel the sale. The customer also requests for the refund to be provided in the form of a cheque made out to his personal business and not to him (who initially made the purchase). Vanessa, the FWD agent who handles this customer, wants to help our customer but this request seems strange and she doesn't feel right. What should she do?

Answer: Vanessa should acknowledge her feelings that something is not quite right. The request of making a refund to a different company or individual should raise some red flags concerning money laundering. Before issuing any refund, Vanessa should talk to her manager and the Compliance department.

[More information can be found in the FWD Anti-Money Laundering and Counter-Terrorism Financing Policy \(AML and CTF Policy\).](#)

Competing Fairly in the Marketplace

Our success depends on our hard work, knowledge and innovative products, rather than on engagement in unfair business practices, such as dividing markets and pricefixing.

Competition laws and our policies prohibit us from engaging in anti-competitive activities that would harm customers and endanger our long-term success.

Violation of anti-competition laws carries severe penalties including prison time and large fines for any responsible employees.

Dividing Markets

Dividing markets involves agreeing with competitors to distribute markets to each company.

As part of this division, companies agree to exclusively deal in certain territories only, while refraining from doing business in other markets.

Dividing markets is against the law because it stops customers from having alternatives in their geographic region, often forcing them to pay higher prices.



Price Fixing

Price fixing involves an agreement among competitors to set prices for certain types of products or services.

Price fixing is against the law because customers expect prices to be determined by supply and demand and other market forces, rather than on agreements entered into by competitors.

As part of Doing The Right Things Right, we should refrain from speaking to competitors about:



- | 01 Our business activities or plans
- | 02 Customer data and insights
- | 03 Our product pricing including premiums, deductibles, pay-outs, discounts and other price-related items
- | 04 Any future products or marketing plans.

Am I doing the right thing?

Q&A

Question: While attending an insurance conference in Hong Kong, Jackie meets another agent from a competitor. At first, Jackie and the competitor talk about how much they are enjoying the conference, but then the competitor suddenly changes topics and says, “You know, we are wasting so much of our time and money trying to beat each other in Kowloon and New Territory. I think we could save ourselves some trouble if FWD focuses on Kowloon and my company focuses on New Territory; we’ll both make more money that way. What do you think?” How should Jackie react to this?

Answer: Jackie should let the competitor know that discussing market division is against FWD’s policies and make it clear that he does not agree to the competitor’s proposal. Jackie should end the conversation and report what happened to the Compliance department. The competitor was trying to engage FWD in anti-competitive practices and we need to document the incident to protect ourselves.

Seek advice from the Compliance department before initiating any discussions or meetings with competitors.

Insider Dealing

Our industry is always changing, with new products constantly in development to meet the challenges and opportunities that life presents. As employees of FWD, we may become aware of important, potentially trend-setting, information about our company or other companies earlier than the public does.

We cannot use material information, before it is made known to the public for trading purposes such as buying or selling stocks. We also cannot engage in “tipping” - using material information to advise our friends, relatives or anyone else on trading decisions.

Material information is only considered “public” after it is made known by the press. As informed and responsible employees, we must check with the Compliance department to ensure that vital information you possess has been made public before trading in stocks.

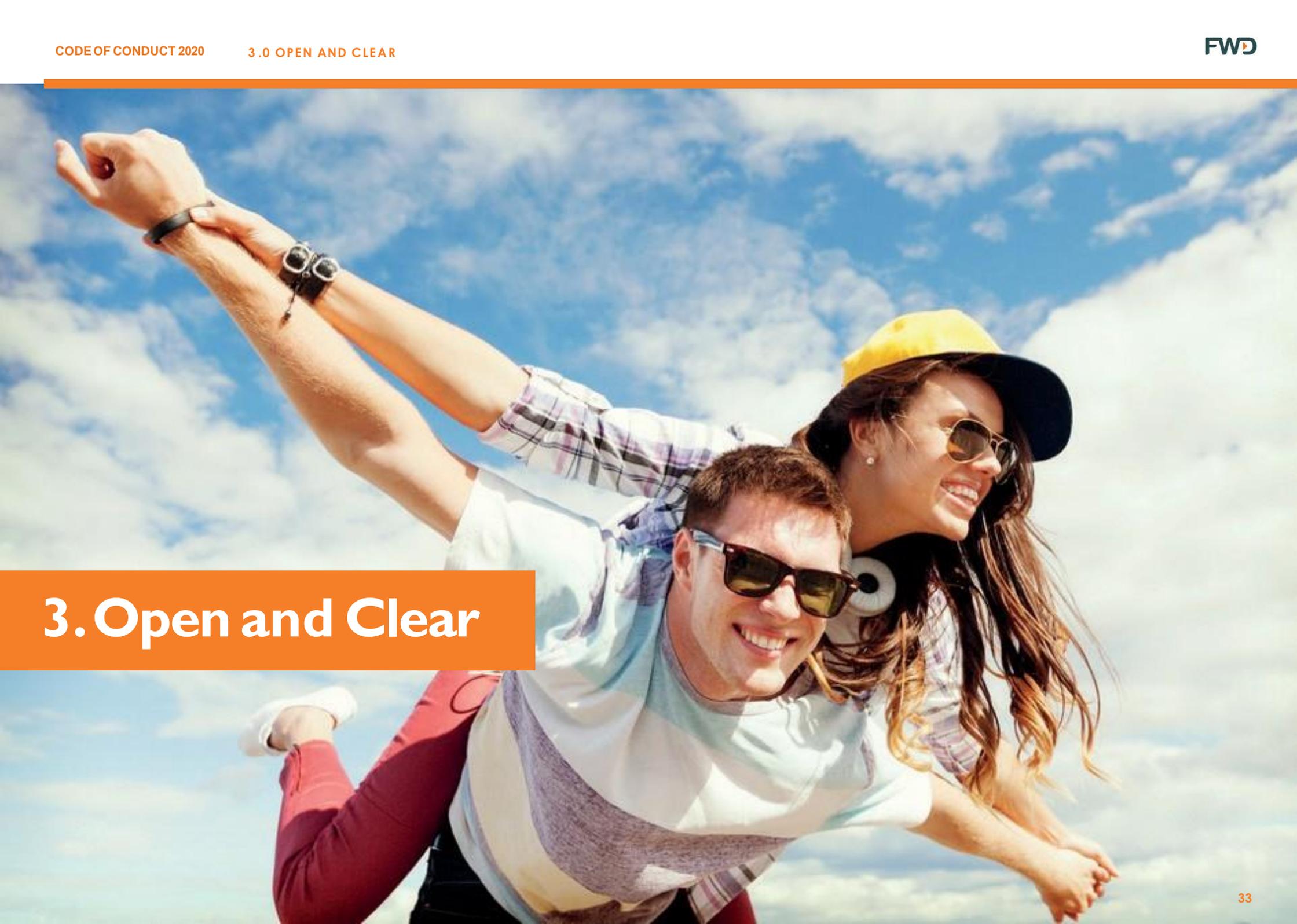
This kind of information is often referred to as “material information” and includes, but is not limited to:



Financial data

Serious litigation
or investigations

[More information can be found in the FWD Personal \(Insider\) Dealing Policy.](#)



3. Open and Clear



3 OPEN AND CLEAR

Conducting our work in an open and clear manner is more than just being honest. It includes treating customers, partners and each other fairly and being transparent in our business dealings.

Every day, we present our products and services objectively, never exaggerate or withhold information from customers, regulatory authorities or from each other. We take it upon ourselves to report concerns or potential violations.

Accuracy of Records

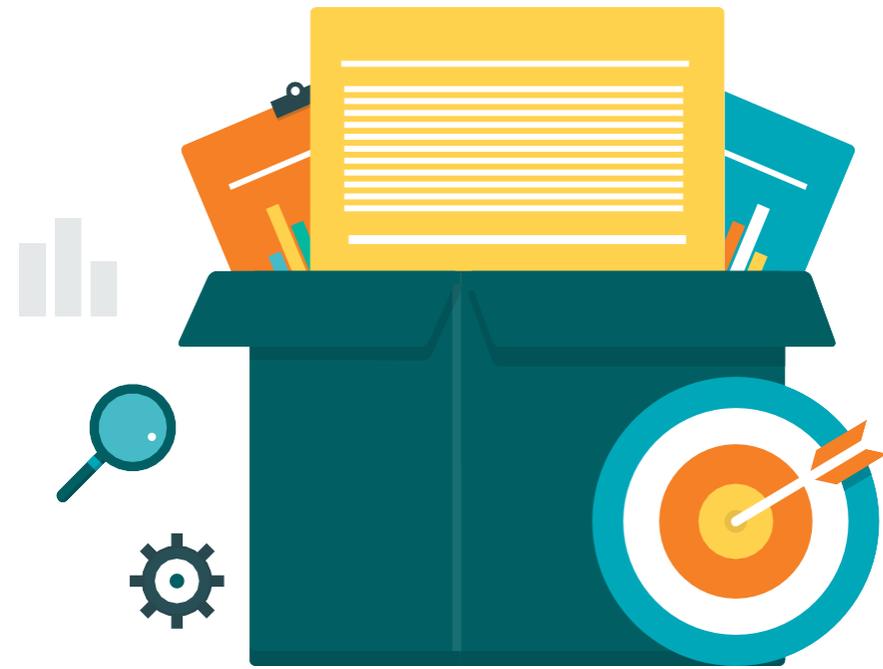
By keeping accurate records, we protect our company's reputation as a trusted insurance partner.

Maintaining accurate records helpsto:

- ▶ Identify improper transactions
- ▶ Confirm that transactions with customers are carried out according to our standards
- ▶ Meet industry regulations on proper accounting practices
- ▶ Maintain a clear and transparent vision of our financial status
- ▶ Forecast future opportunities moreclearly
- ▶ Meet internal and external audit review procedures.

We must also properly manage our records. Record management is important to meet industry regulations and to comply with the requests of internal and external auditors, who can help to ensure that our company is meeting our financial goals.

The most important part of maintaining accurate records is to follow our approved accounting procedures. This includes submitting accurate documentation related to our job duties (such as time sheets and expense reports) and records of dealings with customers.



Am I doing the right thing?

Q&A

Question: I am nearing the end of a sales quarter and have already met my quota. I've had a number of sales come in at the last week of the quarter and I'm thinking about waiting until next week to process them to get a head start on next quarter's quota. In the end, FWD still gets the business so I don't think I'm doing anything wrong. Is this okay?

Answer: No, this is not okay. All records and transactions need to be properly recorded when they actually occurred. Waiting to process the sales will not create an accurate picture of FWD's financial status.

Q&A

Question: Irene is a manager and is going through some expense reports submitted by her employees. During her review, Irene sees an item on a report for "Conference fees in Hong Kong" for a conference that she knows the employee did not attend. Additionally, there are other items related to the conference without any receipts. It appears that one of her employees is trying to commit expense report fraud. What should she do?

Answer: Irene should first contact her employee to determine if the reimbursement for conference fees was made in error. Everyone makes mistakes from time to time and this could simply be a miscommunication. However, if the employee continues to insist that the fees and request for reimbursement are genuine, further steps should be taken to confirm if the expenses are fraudulent or not. Additionally, we should be careful when submitting expense reports to ensure accuracy.

Confidentiality and Data Privacy

A key to our success is protecting confidential information. By protecting our data, we can maintain our competitiveness in the market and demonstrate to customers that we are a trustworthy and valuable partner. We take great care in protecting essential information.

Confidentiality of Employee Information

We have access to private, personal information of FWD employees, including contact information and compensation details. In accordance with all applicable data privacy laws, we only release personal information if legally required to do so by government authorities, such as for tax purposes.

As an employee of FWD, you may also have access to employee personal information, such as names, addresses, email, credit card, bank details and other information. You are required to treat this information confidentially during your employment with us and afterwards.

[More information can be found in the FWD Data Privacy Policy](#)



Confidentiality of Customer Information

At FWD, we understand the close relationships we must build with our customers to provide products that can truly enrich their lives.

We also understand that through our role, we will come into possession of various kinds of personal information. We take great pride in preserving the confidentiality of this information to maintain client trust and to comply with all applicable data privacy laws.

Confidential information should:

- ▶ Only be used for company purposes
- ▶ Only be shared with colleagues on a need-to-know basis
- ▶ Never be shared with anyone outside of FWD (unless the Compliance department permits you to share the information, such as when a Non Disclosure Agreement is in place or when required by a government authority).

Privacy and Use of FWD Systems

Employees using our systems should have no expectations of privacy regarding all information entered in or stored on our systems. All such information can be viewed by FWD. However, we respect our employees' privacy and do not unnecessarily monitor all employee action. Information may be accessed or reviewed should a need arise in accordance with local laws.



Responding to External Inquiries

There may be instances when outside parties, like government authorities or the media, request information. We are prepared to comply with requests by government authorities when legally required to do so. If you are presented with a request by a government authority for any information, please contact the Compliance department to determine whether we are legally required to release the requested information.

We also respond to media inquiries to keep the public informed about FWD's activities. Only FWD employees approved by our Brand & Communications department may speak on the company's behalf to media outlets. If a media outlet (such as a TV or newspaper reporter) makes an inquiry of you, please contact our Brand & Communications department to determine the proper next steps.



Fair Sales and Marketing Practices

Our products have the power to change lives for the better. We should always present our products accurately and take the time to describe the key features, benefits, exclusions and risks.

All agents working to sell our products must provide full and complete information to customers. Managers should review the sales practices of all employees and agents to ensure that communications regarding our products are truthful and accurate.

We always accurately present products to customers, not just during sales interactions, but also through the use of approved marketing materials. Misrepresentations, whether intentional or not, are not permitted.

To put your best foot forward you should spend time thoroughly understanding our products. When you have questions or need more information, seek out information from your manager.



Am I doing the right thing?

Q&A

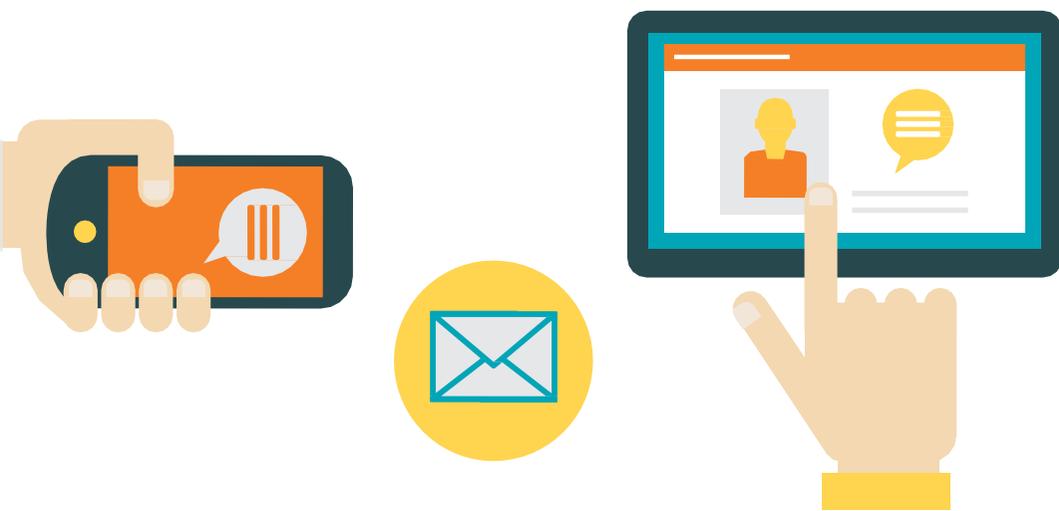
Question: Bruce has recently been hired as an agent for FWD. One of his co-workers, Craig, has offered to let Bruce listen to some of his sales calls. During the sales calls, it seems to Bruce that Craig is not being completely truthful with his clients. Craig often uses jargon and complex terms to describe products. What should Bruce do?

Answer: Bruce should share his concerns with Craig and they both should raise the issue with Compliance for further guidance. Craig should use clear, transparent and honest language when describing our products and services. Craig is not living up to our Code by describing our offerings in a way that is difficult for customers to understand. When we market and sell our products, we need to simply and accurately describe what we are offering along with the potential risks involved.

Using Social Media Responsibly

We may be able to utilise certain social media platforms to promote or raise awareness of FWD's products and services. The Marketing & Communication department, in conjunction with the Compliance department, will advise us on who can communicate with social media on behalf of FWD.

When we use social media we should be respectful of FWD and each other. We must never reveal confidential information through social media, or present the official opinions of the company without prior approval. All of the guidelines about confidential information apply when using social media. If you have questions, please seek advice from your manager and the Compliance department.



Am I doing the right thing?

Q&A

Question: I like to browse various websites about insurance and investing. While looking at one site, I see that someone has posted some information about FWD's products and services that is not accurate. Is it okay that I tell people on the website that I work for FWD and give them the accurate information?

Answer: No. While your intentions are good, only certain people at FWD are authorised to speak or make posts online on behalf of FWD. Using social media is complex and new to many of us. If you have any questions, talk with your manager.

[More information can be found in the FWD Social Media Policy](#)



4. Professionalism and respect



4 PROFESSIONALISM AND RESPECT

Acting with professionalism and respect is an important part of working for an international company. We value the welfare of our colleagues and customers, and genuinely strive for our company's collective success.

We can achieve these goals by maintaining a safe and healthy workplace, promoting diversity and inclusion and being open to new ideas.

Keeping Each Other Safe

The safety and health of our employees is one of our top concerns. We provide a strong work environment to promote employee safety and well-being. Employees are required to follow our safety policies to help maintain this environment.

Please be aware of your surroundings at all times. If you have a concern regarding our work premises, think something can be improved or made safer or are worried about your or another employee's health, please let us know. We are receptive to feedback and take all reports seriously.



We expect employees to be sober while on work premises or when carrying out work engagements in off-site locations. You must not be under the influence of alcohol or drugs (regardless of whether they are legal or not) while conducting FWD business.



At company social events or during off-site meetings with customers, alcohol may be consumed in moderation and in reasonable amounts.

If you have any questions regarding our safety policy, please speak to your manager.

[More information can be found in the Staff Handbook.](#)

HARASSMENT AND DISCRIMINATION

Our offices are staffed by people of many nationalities and ethnicities. We speak a variety of languages and our agents, business partners and customers are a diverse group as well. At our core, we are an international company that embraces diversity.

Our work environment fully supports this dynamic. We do not tolerate any form of discrimination or harassment.

Discrimination

Discrimination is treating someone differently due to their race, colour, nationality, ethnicity, gender, sexual orientation, marital status, medical or physical condition or disability or some other unique characteristic. At FWD, we embrace the unique qualities of all of our employees and customers, and treat each other with respect at all times.

We do not discriminate during hiring decisions and build our workforce based on the merit of each candidate.



HARASSMENT

Harassment includes verbal, physical or sexual behaviour towards another person which causes them discomfort, or intimidates or marginalises them. We do not accept harassment towards each other, our customers, business partners, agents or candidates interested in joining FWD.

Our principle of Professionalism and Respect means that we treat each other fairly and work to embrace our international culture. Part of upholding this principle is taking the initiative to report any incidents of discrimination or harassment to the HR department, your manager or the Compliance department.

If you are the subject of harassment or discrimination, you may feel uncomfortable or intimidated to speak up. We are here to support you, and if you are not ready to speak up, talk to another employee about your situation and approach us together so we can help find a solution.

All reports made to HR department, your manager or the Compliance department will be held confidentially and we do not accept or allow retaliation against any person making a disclosure in good faith.





Am I doing the right thing?

Question: I am at my desk working when I hear a couple of my co-workers talking about Maria, a new employee we hired in the marketing department. I hear them say, "Maria is too old to understand what we are trying to do. She is not from Asia, so she doesn't understand how to make a plan that appeals to our customers. We need to stop giving her projects so she takes the hint that she's not wanted at FWD". What should I do?

Answer: You should say something to your manager. Our policy on diversity allows us to include many different perspectives on how best to get a job done. Your co-workers in this situation are likely discriminating against Maria based on her age and country of origin. Discrimination hurts us all and we need to ensure that it is not tolerated at FWD. More information can be found in the Equal Opportunities Policy & Guidelines, Hong Kong and the FWD Whistleblower Policy.



5. Socially and Environmentally

Responsible



5 Socially and Environmentally Responsible

Being socially and environmentally responsible is expected of everyone working for a reputable company like FWD. It means we manage our business activities responsibly, avoid negative impact on people and the environment, reach out to the community to give back and support noble and just causes.

SOCIAL RESPONSIBILITY

We are committed to supporting the communities around us, backing charities and philanthropic causes and upholding human rights.

To support our local communities, we should stay aware of relevant issues affecting people around us. Where we can, we want to empower local communities' financial sustainability. Our company may organise events such as hikes, walks and charity drives to fundraise for important issues. We encourage you to join these events.

We may back charities and support certain causes using FWD's name or resources. As discussed earlier, we only support these causes if approved by our leadership. You may personally support specific causes using your own funds and resources, and without reference to FWD's name, as long as your intention is sincere and never to gain a business advantage for our company.



We also support the promotion of human rights. This means that:

- We pay wages and provide benefits in alignment with local laws
- We do not hire under-age individuals
- We do not work with customers, agents or business partners that are known human rights violators
- We allow people to organise as they see fit, as long as organisation is allowed locally and does not disrupt our ability to carry out work for FWD.



Remember to always Do the Right Things Right!

You can report violations or express concerns through a variety of avenues:



- By phone – Calling the independent third party Concern Hotline:
 - China – 400-120-0253
 - Hong Kong – 800-903-375
 - Indonesia – 021-29223057
 - Japan – 0800-100-0081
 - Macau – 6262-5093
 - Malaysia - 1548770361
 - Philippines – 2-86263210
 - Singapore – 3158-7652
 - Thailand – 021056128
 - Vietnam – (028)44581010



- URL: [ConcernOnline](#)

