



## Guideline regarding Tryg's Whistleblower Line

### Reason for the Whistleblower Line

Tryg wants to be an open and reliable company that does not jeopardise the credibility of the Group Executive Management or other employees. Tryg wants to ensure that all concerns about any illegal acts or conduct not in compliance with legal requirements and Tryg's own rules are investigated thoroughly.

Employees are often the first to detect illegal activities in the workplace. However, it often turns out, that people will be reluctant to move forward with their suspicions. This is often due to fear of appearing disloyal to colleagues or employer.

This is the reason why these guidelines are implemented.

### The purpose of the Whistleblower Line

The purpose of Tryg's Whistleblower Line is both to avoid that information about illegal conduct, etc. is kept secret and also to ensure that such information is passed on to the right persons in our organisation. These guidelines should be seen in conjunction with other measures supporting Tryg's core value of being a reliable company in which all stakeholders can rest assured that nobody tries to conceal or suppress crucial information.

### What can be reported?

By establishing the Whistleblower Line, Tryg has made it easier for employees, the Supervisory Board and the outside world to draw attention to serious matters violating the law. Issues reported could be concerns employees, members of the Board and other related to Tryg. Furthermore, it is possible to report serious matters aimed at employees.

You can only report matters relating to Tryg. The fact you can report is, for example suspicion of serious economic crimes such as fraud and corruption. You can also report suspicions of insider trading, competition law violations, irregularities regarding accounting matters or internal controls. Additionally, you can report serious matters relating to employees, as well as conditions that have resulted in significant personal injury or environmental damage.

Furthermore, Tryg employees can report violations or potential violations of the Danish Financial legislation committed by Tryg, including violations committed by employees or members of the Supervisory Boards of Tryg Forsikring A/S, Tryg Livsforsikring A/S, Forsikrings-Aktieselskabet Alka Liv II and Tryg Invest A/S.

As for Swedish employees, only concerns regarding serious matters violating the law executed by employees in key positions and executive positions may be reported.

### What can not be reported?

You can not report facts as bullying, cooperation problems and similar through the Whistleblower Line. Instead you can report this to management or HR.

Norwegian employees who become aware that bullying or discrimination in the workplace is taking place, can also report this to "Verneombudet"

### How do you report to the Whistleblower Line?

Do you have knowledge about, and want to draw attention to conditions as mentioned, you can report this via <http://tryg.whistleblowernetwork.net/>

The Head of Compliance, Denmark and the Chairman of the Audit Committee in Tryg will receive all reports. When you contact us, please note the following:

By using the Whistleblower Line you can choose to remain anonymous. We do, however,



encourage you to identify yourself. Even if you choose to remain anonymous, your identity may later be known as a result of the subsequent investigation of the reported information.

In order for your suspicions to be examined thoroughly, you should identify and describe the facts as detailed as possible. The more information you provide, the easier it will be to investigate a concern.

### **Receiving and processing of reports and subsequent investigation**

The Whistleblower Line is a fully electronic system without human interaction. The system receives all alerts via a dedicated website. The system sends a message to the Head of Compliance, Denmark and the Chairman of the Audit Committee in Tryg simultaneously. These will make an initial assessment, and, where appropriate, initiate an examination of the reported concern. The documentation for your inquiry will be treated confidentially and securely.

It is important to avoid that innocent persons are falsely suspected of any irregularities that may involve violation of the law or professional misconduct. The purpose of the investigation of your report is therefore to identify and document whether the concern is substantiated. However, the purpose is also to prove a respective person's innocence if the concern turns out to be unfounded.

### **Concerns directed towards employees**

If the report relates to a Tryg employee, the Head of Compliance, Denmark will inform the Head of Group Security, after which further investigation will be made by Group Security / Internal Investigation. The Head of Group Security will regularly inform the Executive Management.

If your concern relates to employees of Tryg's Group Executive Management, the Head of Compliance, Denmark and the Chairman of the Audit Committee will assess the report and conduct further investigation of the report – possibly via an external firm. Via the Head of Compliance, Denmark, the Chairman of the Audit Committee may order the Group Security / Internal Investigation to participate in the investigation. The Head of Group Security and Internal Investigation have professional secrecy and report in these matters only to the Chairman of the Audit Committee or the Head of Internal Audit unless they are ordered otherwise. In such cases, the Executive Management is not informed.

The persons to whom the report relates are informed according to the applicable legislation of the individual countries.

### **Suspicion against others associated with Tryg**

If the report regards to others associated with Tryg, such as customers, partners or suppliers, the Head of Compliance, Denmark will inform the Head of External Investigation who will perform the further investigation.

Any reported person or party will subsequently be notified according to the legislation in the individual countries.

**Precautionary measures**

If an investigation of an employee below the Group Executive Management level shows that there is a questionable circumstance, the case will be handed over to Human Resources that assesses whether the issue will have employment-related consequences for the employee, and whether the case must be reported to the police.

If an investigation of a member of the Group Executive Management shows that there are criminal or questionable circumstances involved, it is the Supervisory Board that assesses consequences and possible report to the police.