

C1 - Public



FWD Vendor Code of Ethics and Business Conduct

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Introduction

At FWD Group, we are in the business of insurance. We aim to help our customers alleviate their financial worries and plan for their future. Every transaction that we undertake affects people's lives by enabling their financial sustainability, and with that knowledge comes great responsibility. We're building and maintaining a culture of integrity where we **do the right things right**.

We work with a wide range of business partners, and product and service providers ("vendors"), who are an integral part of our operations. We believe in strong environmental, social and governance ("ESG") practices, and expect our vendors to adhere to the same ESG standards.

Accordingly, we have developed the FWD Vendor Code of Ethics and Business Conduct (this "Vendor's Code") as a guide to our expectations we have of our vendors.

This Vendor's Code has been developed in alignment with FWD Code of Ethics and Business Conduct, as well as guided by international human rights principles, such as the principles set out in the United Nations Guiding Principles for Business and Human Rights, the International Bill of Human Rights, the International Labour Organization's Declaration on Fundamental Principles and Rights at Work and Core Conventions, and the United Nations Global Compact's Principles on Human Rights.

At the minimum, FWD Group expects vendors to adhere to the Vendor's Code and all applicable laws and regulations wherever the vendors operate. When difference or conflicts in standards arise, vendors are expected to comply with the highest standard.

This Vendor's Code covers five critical areas of a vendor's business conduct:

1. Honesty and integrity
2. Be informed and act responsibly
3. Open and clear
4. Professionalism and respect
5. Socially and environmentally responsible

1. Honesty and integrity

FWD upholds the belief of operating our business with the highest ethical standards, compliant with all local and national legislations. We seek to partner with vendors who conduct their businesses abiding by the standards and conditions as us, which are detailed below.

Rejecting bribery and corruption

FWD is committed to conducting its business without employing bribery or unethical

activities. While delivering goods and services, and acting on our behalf, we also expect our vendors:

- Not to offer, pay, promise or authorise any bribes, kickbacks, inappropriate gifts or hospitality or any other improper incentives, payments or benefits to FWD staff or their immediate family, to obtain business, or gain any improper advantage or violate applicable anti-corruption laws.
- Not to offer, grant, pledge, authorise, demand or accept any gift, fee, reward, entertainment or any other advantage to any person as an inducement to perform any act which is or may be deemed as dishonest, illegal or a breach of trust.
- Not to make any payments to individual government officials unless specifically authorised by FWD prior to such a payment is made.

Conflicts of interest

- Avoiding acts that create or potentially create any conflict of interest relating to financial or other arrangements with any of FWD's employees or any of our employees' immediate family members, that may be deemed to interfere with or influence how FWD engages with the vendor.

Use of market position

- FWD does not tolerate vendors taking advantage of anyone through manipulation, concealment, abuse of privileged information, intentional misrepresentation of facts or any other unfair practice.
- An act where a vendor abuses its substantial market power to gain business advantage is considered inappropriate and unacceptable.

Respecting the FWD relationship

- Not exploiting the relationship with FWD or use FWD's brand name in connection with any fraudulent, unethical, or dishonest act.
- Vendors must not misrepresent FWD's products and services, nor substitute a different product or service, or use other third parties to support FWD contracts, without appropriate prior approval.
- Vendors may not use any text, trademarks and/or logos related to any FWD companies, on websites or any other promotional material without the written permission of FWD.

Gathering of market and competitor information

- Vendors must not obtain information unlawfully or through other inappropriate channels. Market intelligence obtained by such means must not be shared with FWD.

Respecting copyrights

- FWD will only handle and employ information and materials that we have a right to use, and we expect the same standard from our vendors. For example, when compiling marketing materials, we can only use images that we have a license to use, such as pictures from our company image bank, or a proper paid commercial source.

2. Be informed and act responsibly

As a responsible company, FWD strictly complies to the laws and regulations of the countries where we operate. By the same token, we expect our vendors to share our commitment to following these legal and regulatory obligations.

In this regard, we expect our vendors to:

Know and follow the laws that apply to them and their business

Treat legal requirements as their minimum operating standard

Alert FWD when there are any material issues with the goods and services they supply, especially for health and safety issues.

Recognizing and avoiding money laundering and counter terrorist financing

We are committed to strictly comply with all applicable Anti-Money Laundering (“AML”) and Counter Terrorist Financing (“CTF”) laws and regulations that are prevalent in the locations we operate in. While acting on our behalf, we expect our vendors to:

Not engage or attempt to engage in any transaction involving proceeds derived from any unlawful activities.

Design and implement policies, procedures and controls in relevant operational areas, taking into consideration their special circumstances, so as to meet the relevant AML/CTF statutory and regulatory requirements.

Not have dealings with designated individuals and entities (such as suspected terrorists or narcotics traffickers) who are subject to international economic sanctions.

Ensure that, when sourcing for products, the materials does not contribute, directly or indirectly, to any armed conflict, including terrorist financing or human rights violations.

Economic sanctions

FWD is committed to complying with sanctions laws and regulations issued by international governing bodies as well as the laws and regulations of the countries in which FWD operate. We expect our vendors to follow the same commitment and ensure all their suppliers and partners are not sanctioned individuals or blacklisted entities.

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. Likewise, similar acts like market sharing or bid rigging are strictly unacceptable.

3. Open and clear

Accuracy of records

On handling records relating to our engagements of vendors, we expect our vendors:

- To maintain detailed and accurate books and records in respect of expenses incurred on our behalf, in particular when dealing with government officials
- Not to submit inaccurate time sheets, spend reports, proposals or invoices to FWD

Confidentiality and data privacy

FWD takes great care in protecting essential information of our clients, our business, and our staff. We expect our vendors to:

- Comply with all applicable data privacy laws and contractual requirements
- Protect any FWD confidential information which they have access to, including FWD's proprietary information, intellectual property, trade secrets and know-how
- Not access or disclose any personal or financial information of our staff or our clients except when authorised by FWD in writing, and when such information is used for business purposes or to adhere to legal and regulatory obligations
- After the termination of an engagement with FWD, the vendor must follow FWD instructions on data retention and destruction, and commit not to divulge any personal information to unrelated persons, unless required by law.

Protect FWD's information, assets, and interests

We expect our vendors to safeguard FWD's reputation, and any information or property we entrust to them. We expect our vendors to:

- Safeguard any FWD assets or property that are under their control
- Avoid any situations that may adversely affect our business interests or reputation
- Notify FWD promptly of any unauthorised access or disclosures, or any damage or loss of assets.

4. Professionalism and respect

The following principles reflect the values FWD upholds in our business operations, including offering a safe working environment, and our stance in respecting staff, ensuring our workplace is free from harassment and discrimination.

Keeping each other safe

We provide a safe and healthy work environment for all employees in compliance with local regulatory laws and standards to protect them from injury or occupational illness. We expect our vendors to follow the same local regulatory laws and standards for their employees to facilitate a safe working environment.

Harassment and discrimination

Discrimination means treating someone differently due to their characteristics, including without limitation, 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 tolerate any form of discrimination or harassment, whether through verbal, physical or sexual behaviour, towards our employees, contractors, customers, business partners, agents or candidates interested in joining us.

We expect our vendors to follow the same standards, and the respective local laws and regulations. For example, in Hong Kong the relevant legislations include the Sex Discrimination Ordinance, the Disability Discrimination Ordinance, the Family Status Discrimination Ordinance, and the Race Discrimination Ordinance.

5. Socially and environmentally responsible

Being socially and environmentally responsible with a commitment to respect and promote human rights is expected of everyone working for a reputable company like FWD. Likewise we expect the vendors whom we work with to honour the same commitment.

Environmental stewardship

FWD ensures that our work also has a positive impact on the environment and at the minimum, meet local and international environmental regulations. We expect our vendors to:

- Comply with all relevant local environmental legislation and regulations.
- Minimise the environmental impact of their operations and our value chain through:

- Implementing suitable environmental policies and environmental management systems,
- Promoting the recycling and reuse of materials, while taking the necessary precautions to ensure compliance with legislation on the handling or disposal of any hazardous materials used in our operations,
- Promoting energy efficiency and water conservation,
- Reducing greenhouse gas emissions and business travel,
- Minimising waste footprint and resource use, such as paper,
- Using internationally recognised eco-labels, environmental standards and certifications.

Human rights

We are committed to the promotion of human rights. We expect our vendors to share this commitment, and to:

- Respect and protect their employees' labour rights, such as entitlements to wages, leave and other benefits, work hours arrangements and continuing trainings and career development
- Prohibit the use of child labour and forced labour in the production of its goods or services
- Not work with any suppliers, agents or business partners that are known human rights violators
- Respect the freedom of their employees to express personal opinions and to maintain an inclusive working-environment
- Provide an effective mechanism for reporting grievances and whistleblowing without fear of retaliation

Monitoring & review

FWD aims to build trust-based relationships with our vendors, who we expect will follow the principles of this Vendor's Code. Vendors must also make reasonable efforts to monitor and ensure that their own supply chain is aware of this Vendor's Code and the expectations.

FWD may conduct its own due diligence, including audits or investigations in relation to possible breaches of law, regulations or company policy as it deems appropriate. We expect our vendors to cooperate with our reasonable requests for information, certifications, and/or to carry out appropriate audits.

If any compliance issues arise, the vendor has the responsibility to bring them forward. When there is a concern or non-compliance with the Vendor's Code, the vendor shall implement corrective actions in a timely manner.

Updates

This Vendor's Code shall be reviewed periodically to ensure its relevance and effectiveness, including with any charters or policies that FWD may choose to sign or adhere to.

Speak up

If you see or suspect any conduct or business practices that are non-compliant with this Vendor's Code, please alert FWD by contacting us through any of the following channels:

By calling the Speak Up Hotline: (HK tollfree) 800 903 375; (SG tollfree) 3158-7652.

The call will be answered by a specialist and independent third party operator (Convercent) and is completely confidential. The vendor can choose to remain anonymous if required and the call is not voice recorded. All reports received via Speak Up Hotline will be logged to the Speak Up Online by the independent third party operator for follow-up action and management.

The Speak Up Hotline (tollfree) for the other countries where FWD operates are as follows:

- Cambodia – 2396 2515
- China - 400-120-0253
- Hong Kong – 800-903-375
- Indonesia - 021-29223057
- Japan - 0800-100-0081
- Macau - 6262-5093
- Malaysia - 01548770361
- Philippines - 2-86263210
- Singapore - 3158-7652
- Thailand – 021056128
- Vietnam - (028) 44581010

By submitting an online report via Speak Up Online through the following links:

www.fwd.com/SpeakUp