



Code of Ethics and Conduct

2026



QBE's Code of Ethics and Conduct applies across the organisation to everyone – employees, contractors (long or short term), contingent workers (including consultants), directors, agents and anyone else who represents QBE in any capacity. Any references across this Code to 'employee' should be read as inclusive of anyone who represents QBE. This Code also applies to any joint ventures where QBE has a controlling interest.

To support the Code and to reflect QBE's commitment to ethics and compliance, key areas have been identified to provide Group-wide clarity and consistency. In these areas, Group Policy sets global minimum standards, supported for some divisions by local policies that address specific requirements and laws.

All employees should note that the principles set out in any Group Policy apply to everyone, in conjunction with their local policies. Group Policies can be found on the Group Governing Document Portal on QUBE. Local policies can be found on Divisional QUBE pages.





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From our Group CEO

As an international insurer with deep expertise across key markets, industries and sectors we are well positioned to offer insight into managing the risks our customers face, both current and emerging. This is a privilege and responsibility, and I am proud to be leading an organisation that gets to the heart of what matters for our customers, communities and the economy at large.

We are committed to upholding the highest standards of business conduct. Our Group Code of Ethics and Conduct (our 'Code') together with our DNA, underpins who we are, what we stand for, how we do business, and what we value.

Our Code is updated each year to ensure our business remains relevant and sustainable in an ever-changing world. I ask that you make reading this Code a priority, diligently complete the Code training and apply its principles to the work you do every day.

I am committed to ensuring that QBE is a safe and inclusive workplace; one where we live our DNA and have courage and support to do the right thing, including calling out behaviours or practices that fall below the standards in our Code, and speaking up with new ideas. As new risks emerge and innovation continues to reframe our industry, we'll be at the heart of it – for our people and our customers.

Thank you for your commitment to QBE and for doing the right thing for our customers, our partners, our communities, our business and each other.

Andrew Horton
Group CEO



Welcome to QBE's Code of Ethics and Conduct

Our purpose, enabling a more resilient future, is at the heart of our organisation and reminds us why we exist. We are committed to helping our people, customers and communities keep pace with the changing world around us, bringing our unique blend of expertise and empathy to unlock a future full of opportunities.

QBE operates across many regions, countries and markets. We must use good judgement and make decisions that are ethically sound and aligned with our purpose and vision. This includes taking action to deliver a consistent experience for our customers and partners and ensure a safe and inclusive workplace for each other.

The QBE Group Code of Ethics and Conduct (our 'Code') clearly outlines the professional standards and ethical behaviour expected from all our people. When we live by our Code, we demonstrate these standards in all our actions and interactions.

This Code does not provide detailed instructions for every situation you might face. It should be used as a reference point to help guide your decision-making. To find an answer, you may need to look beyond this Code, to policies and other resources on QUBE. If you are ever in doubt about how to proceed with something, speak up and ask for advice.

You are expected to read our Code and meet its standards every day. If you see or hear about behaviour that falls below the standards in our Code, call it out so we can address it.

Remember, our strengths
lie in not just what we do,
but how we do it.



Our standards of professionalism

QBE is an **international insurer** and **reinsurer**, operating across Europe, North America, Australia, the Pacific and Asia.

We are driven by our purpose of **enabling a more resilient future** – helping those around us build strength and embrace change.

As financial services professionals at QBE we all contribute to **delivering on our purpose**.

Our standards of **professionalism** are our **behavioural** foundation and along with **our DNA**, guide how we do things at QBE.



For more information on QBE's How, please see Our DNA page on QUBE.

Everyone at QBE is expected to:

- ✓ Serve the best interests of our customers, acting honestly and with integrity at all times. This includes safeguarding confidential and personal data.
- ✓ Comply with QBE procedures and the law. You are expected to speak up if you see people not doing the right thing.
- ✓ Be aware of and manage the risks associated with your role.
- ✓ Operate within your level of skill, competence and authority and seek advice before making decisions if you're unsure.
- ✓ Perform your role diligently, efficiently and to the best of your ability. Use technology and facilities in a safe and acceptable manner only, and complete all mandatory training assigned to you.
- ✓ Be courteous and respectful. Your conduct should contribute to QBE being a positive, safe and inclusive place to work.
- ✓ Promptly seek guidance if you identify a potential or actual conflict between your personal interests and those of QBE and/or our customers. Never abuse a position of trust or authority.

For a reminder of your responsibilities and the consequences of failing to meet the standards set by our Code, see pages 32-33.



Who we are

OUR DNA

Ethical and fair

Sustainability

Community spirit



OUR DNA

Our DNA is fundamental to who we are and how we get to the heart of what matters. It describes how we expect everyone across the Group to behave and how we need to operate to fulfil our purpose.

When we're at our best we bring each of these seven attributes to life in everything we do, with behaviours that are part of "how" we do things. This is felt by all our stakeholders, including our people, customers, shareholders and the communities in which we operate.

One of the ways we are inclusive is through Inclusion of Diversity.

At QBE, we believe the rich diversity of our workforce is an organisational strength. Creating a workplace culture and influencing the external environment so that our people, customers, suppliers, and stakeholders feel included is essential to our success, now and into the future. This means everyone feels respected, treated fairly, valued, safe to speak up, and inspired to do their best work.



For more information, please see the Group Inclusion of Diversity Policy, which applies to everyone at QBE.





Ethical and fair

Competing fairly

We believe in free and fair competition, competing ethically and lawfully in our activities. Everyone at QBE must respect applicable competition and antitrust laws across the globe.

Agreements among competitors to fix prices, reduce prices or exclude other competitors from the market are serious antitrust/anti-competitive offences. Such actions are illegal and prohibited.

When we interact with competitors or potential competitors:

- We do not obtain or share sensitive commercial information, confidential information or communicate false information.
- We make our business decisions independently from competitors and without collusion.



Refer to the Group
Antitrust Policy
for further guidance.

Our customers

At QBE, we are committed to prioritising our customers and their experience in working with us. We maintain a culture that is honest, fair, professional, and places our customers at the heart of the decisions we make across the enterprise.

We are all responsible for delivering an excellent customer experience, whether you are a colleague who directly interacts with customers or supports those who do.

We design value-driven products and services that meet the needs of our defined customer segments and consistently review them to ensure they perform as intended.

We communicate clearly with our customers to ensure they can make informed decisions about our insurance products and services. Our marketing communications are designed to be fair, clear, understandable and never misleading.

We prioritise the quality and timeliness of our insurance policy and claims documentation to support our customers.

Our QBE customers and claimants are provided with appropriate claims support and claims are handled in a fair, accurate and timely manner.

We value feedback from our customers and expressions of dissatisfaction are recognised as opportunities to improve. We ensure all complainants are treated fairly, with an emphasis on timely resolution.





Sustainability



More information is available in the Group Environment Policy and Group Human Rights Policy.

Sustainability at QBE is about understanding the environmental and social challenges that may affect our business, customers and communities, and playing our part in addressing them in line with our purpose of enabling a more resilient future. We seek to integrate sustainability into how we make decisions and conduct our business to manage risk, support innovation and strengthen long-term performance. This applies across our roles as an employer, insurer, investor and business partner.

Our sustainability strategy is articulated through our Focus Areas and is supported by our Sustainability Scorecard targets.

Our three Focus Areas are:

- Take action to support climate resilience and the transition to a net-zero economy.
- Enable a sustainable and resilient workforce.
- Partner for impact through innovative and sustainable solutions.

Environment

Our approach to managing climate and other environmental risks and opportunities is embedded in our sustainability strategy and risk management frameworks. We comply with applicable laws, as well as our voluntary commitments through our operations, supply chain and business relationships.

Human Rights

We respect human rights and are committed to avoiding human rights harm. We seek to adhere to internationally recognised human rights principles to ensure our employees, customers, communities, and suppliers are treated fairly and with dignity. While respecting international human rights principles, we comply with applicable laws, including those relating to modern slavery.





Community spirit

The QBE Foundation is committed to creating strong, resilient and inclusive communities in partnership with community organisations. We focus our investment and efforts on two key areas where we believe we can have the greatest impact: climate resilience and inclusion.

Risk management is central to our business. The QBE Foundation seeks to establish long-term partnerships aiming to improve the resilience and preparedness of communities through education and awareness, so they are better equipped to manage risk and protect themselves.



You can find more information about the QBE Foundation on QUBE or on our website.

We invest in our communities through our community partnerships, financially and with in-kind support.

Charitable contributions and donations

Charitable contributions and donations must not be, or give the appearance of being, used for any illegal or improper purpose.

To ensure we remain true to the Foundation's vision and strategy, before QBE funds or resources are donated or contributed to any charitable cause:

- The QBE Foundation eligibility criteria must be applied. You should contact your local Foundation Manager for advice and any required approvals.
- All applicable laws, regulations and QBE policies and procedures must be complied with. Seek advice first if you are unsure.
- Applicable QBE policies include the External Communication and Reputation Management Policy, Group Conflicts of Interest Policy, Group Gifts and Entertainment Policy, Group Financial Crime Framework, and supporting divisional policies and guidelines (where applicable).



How we behave



At QBE we behave in a professional, courteous, honest and respectful manner.

This is expected of everyone, whether interacting with colleagues, customers, or any other stakeholders.

We should all feel safe, respected and included at QBE.



We do not engage in, condone or permit behaviour that is offensive, harassment in any form (including sexual harassment), threatening, inappropriate, abusive, bullying or intimidating.

We provide an environment enabling you to feel safe to speak up and report any genuine concerns.



How we behave

Safety to Speak Up

At QBE we aim to maintain a culture where everyone feels safe to participate, experiment, challenge, and to call out risks, issues or concerns. This is key to our ongoing success because it encourages innovative, collaborative and diverse thinking. It also helps us identify and manage ethical issues and misconduct.

We expect our people to report any conduct or activity they reasonably believe is dishonest, corrupt, unethical, inappropriate or illegal promptly and without delay. This includes behaviour by colleagues, customers, business partners, and any other stakeholders.

We understand it's not always easy to speak up. QBE is committed to reviewing all reports received, and take all concerns raised seriously. We do not tolerate any form of retaliation. Where misconduct is identified, QBE will take appropriate action.

Channels for reporting concerns include your People Leader, senior management, and your local Compliance, Legal or People teams. QBE also provides a specialist third-party reporting service called the Ethics Hotline that is available in most locations, where reports can be made anonymously (subject to local requirements). If you are unsure about how to approach a situation, a confidential 'General query or ask for guidance' can also be submitted to the Ethics Hotline.

For some disclosures, you may be eligible for additional legislative protections, generally referred to as 'whistleblowing protections'. Specific requirements may need to be met for these to apply, such as what the disclosure is about, who it is made to, and where you are located.



Refer to the Group Whistleblowing Policy for further guidance.

Ethics Hotline Access Details

The Ethics Hotline is an independent third-party reporting service provided by NAVEX Global. The service provides reporters the ability to communicate confidentially with the individual managing their report, including anonymously where permitted by local law.

The Ethics Hotline can be accessed via:

[Web page here](#) Note if you are an employee this link can also be found on QUBE.

[Phone in eligible locations](#) Please refer to the Group Whistleblowing Policy for a list of telephone access numbers by country.

People leader guidance

- Support and actively promote speaking up, including the reporting of all actual or suspected wrongdoing based on reasonable belief.
- Listen to concerns raised, treat these seriously, and if needed refer these to the relevant team, including via the Ethics Hotline.



Personal circumstances

Before or during your employment with QBE, we may undertake background screening and/or background checks to assess your suitability to work.

There are some circumstances where you are required to proactively disclose information to QBE. This is to allow QBE to assess the relevance of the information on your role, the impact on QBE's reputation, and to make sure QBE complies with applicable legal or other requirements.

- If you are charged with or convicted of any criminal offence at any time, you are required to promptly inform your People Leader or People team (unless disclosing such information is prohibited by law).
- For some roles, in some jurisdictions you may be required to complete an annual disclosure regarding whether you have been charged or convicted of a criminal offence.
- Some employees have additional obligations. For example, those subject to the Group Fit and Proper Policy are required to disclose to their People Leader if they are declared bankrupt, involved in financial or ethical misconduct, or if any matter occurs that is likely to impact their fitness and propriety.
- Where you are required to hold a professional licence to undertake your job (such as an accounting or legal qualification) you must tell your People Leader if:
 - you are censured by any professional body (e.g. a legal oversight body censures you for any reason), or
 - you lose that licence, or
 - you don't complete any of the requirements of the licence or qualification.



How we behave

Conflicts of interest

The best interests of QBE and our customers should come first. It is important you know how to identify any perceived or actual conflicts of interest (including actions affecting QBE's market integrity) that may compromise your ability to act fairly and objectively.

Everyone at QBE must:

- Carry out their duties in good faith.
- Refrain from any activity if a conflict of interest arises, and promptly seek advice.
- Report actual, potential, or perceived conflicts of interest without delay.
- Never ignore behaviour by others that appears to involve a conflict of interest. Raise such issues with a member of the Compliance team or use the Ethics Hotline.

Some of the ways conflicts of interest can arise are outlined here. These are a summary and are not the only examples.



For more information, refer to the Group Conflicts of Interest Policy.

Examples of potential sources of conflicts of interest	QBE's requirements include
Market Integrity – Personal investments in a competitor, supplier, vendor or customer of QBE.	<ul style="list-style-type: none"> • You must disclose any investment or financial interests in companies that seek to do business with QBE, or currently do so, or are competitors of QBE.
Personal relationships with an employee, supplier or customer.	<ul style="list-style-type: none"> • You must disclose certain relationships to your People Leader and Compliance team. They will assess and advise whether there is a conflict, and if it can be managed appropriately. • You must not use QBE's systems to access, view or change any record, policy or claim where you, a relative or friend is named as an insured or an interested party. Interested parties include intermediaries, suppliers and other third parties.
Secondary employment.	<ul style="list-style-type: none"> • In some circumstances, it is OK for QBE employees to have secondary employment. • However, you must declare all secondary/outside employment to your People Leader and your Compliance team so the potential for conflict of interest with your position at QBE can be assessed.
Gifts and entertainment can help build client relationships through social settings such as meals, events, or hospitality, but we must avoid any appearance of impropriety. QBE conducts business with integrity and prohibits offering anything of value to improperly influence others; all forms of bribery and corruption are strictly rejected.	<ul style="list-style-type: none"> • There should be no expectation of something in return. • Never allow gifts and entertainment to create a conflict of interest. • Due to the decision-making authority and power vested in public officials (such as officers and employees of government agencies), gifts and entertainment exchanged with them create additional risks. • Register any gifts and entertainment in accordance with the Group Gifts and Entertainment Policy.



Refer to the Group Gifts and Entertainment Policy for more information.



Social media

If you use internal or external social media, QBE expects you to represent yourself in line with this Code. Key things to remember include:

- Be professional and inclusive in your interactions. It's OK to disagree, but it's never OK to be disrespectful of others.
- Never post confidential data, or any supplier, customer or employee information on internal or external social media sites.
- You can like and share anything you see on QBE official social media channels in an appropriate and professional way.
- It's OK to share your pride in our company by letting people know you work here, but you should consider how much information you share about yourself, particularly in customer-facing roles.
- Posting on social media on behalf of QBE in an official capacity is permitted only by individuals in specific roles where this a job requirement.
- Do not let time spent on social media affect your work performance.

Personal presentation

A dress policy can't cover every situation, but QBE expects everyone to dress appropriately at work. This means:

- Considering whether your attire reflects the requirements of your role, for example if you have client and customer interactions.
- Being considerate of your colleagues.
- Clothing items must not have objectionable or controversial images or language on them, including, for example, political or religious statements which a reasonable person may find offensive.

Alcohol and drugs

Being under the influence of alcohol and/or drugs at work may impair a person's capacity to perform their job and may endanger their own or other people's safety.

- You must not commence work, be at work or return to work while under the influence of alcohol, or illegal or illicit drugs. This includes when you are working from other QBE premises that aren't your normal place of work and when you are under the legal responsibility of QBE, for example during business travel.
- When you are at events that are organised by QBE where alcohol is served, you are expected to drink responsibly and behave professionally, in accordance with QBE workplace behaviour policies.
- You must not sell, purchase, possess or distribute illegal or illicit drugs.

Support is available

If you need help and assistance in dealing with alcohol or drug problems, you (or your family members) should seek help from QBE's confidential Employee Assistance Program or your local People team.



How we conduct our business



Complying with laws and policies

There are a significant number of obligations that apply across our day-to-day activities at work, to the products we sell and the services we provide. They come from laws, regulations, Industry Codes, business or ethical standards, and which are translated through internal policies and processes.

You are expected to know about and comply with all obligations that are relevant to your role. This requires you to proactively monitor and respond to relevant obligations. Claiming ignorance of the law or our stated requirements is no defence.

Information, support and training are available. If you have any doubts, questions or concerns you must raise them.

Confidentiality

Confidential information includes non-public financial, corporate and personal information. Examples include (but are not limited to):

- Technical information about products or processes.
- Customer and vendor lists.
- Any business strategy such as pricing, marketing, or service strategies.
- Non-public financial reports.
- Information on asset sales, mergers and acquisitions.

You will have access to confidential information at QBE. You must protect it and manage it responsibly and must not improperly or inadvertently communicate it to other people where they don't have access to that information. You must never use it for personal advantage.

You must be familiar with and adhere to all terms of your employment or contractor agreement dealing with confidential information.

Privacy

QBE is committed to respecting privacy and taking measures to protect personal data that we handle from misuse or unauthorised disclosure, and complying with applicable privacy laws.

We collect, use and share personal data where it's needed for legitimate business purposes, and for our employees for purposes related to their employment, or in the case of contractors, their engagement with us, or where there's a legal need to do so.

Everyone at QBE should understand the importance of respect for privacy and ensuring personal data is respected, managed and protected from misuse or unauthorised disclosure.

We have very specific privacy obligations for personal data in our organisation, and any wrongful use, disclosure or loss of personal data is a serious matter.

When we work with third parties, we make it clear to them the importance we place on privacy and the standards we expect.

All customer, employee (including contractors), candidate, and other personal data (including from supplier and partner organisations) must be treated with the same care. If we collect it, we have to protect it.

Risk management

QBE is exposed to a wide range of risks, making effective risk management critical to achieve an optimal return and gain competitive advantage. Our Enterprise Risk Management Strategy (RMS) describes the approach we take for managing risk, which includes our Enterprise Risk Management Framework. We are all responsible for managing risk every day across all levels of the organisation, which includes:

- Proactively identifying and assessing risks and controls.
- Reporting and escalating concerns, including issues and incidents.
- Contributing to and promoting a strong risk culture.



Interacting with governments

QBE is committed to making a positive contribution to public debate on issues affecting the insurance sector. We engage with governments, politicians and other stakeholders (including industry bodies) in a responsible, open and transparent manner.

Our engagement is focused on contributing to the development of public policy with the aim of achieving balanced policy and regulatory outcomes for all stakeholders – including our shareholders, customers, the community and governments.

We do not restrict individual rights and freedoms. Individual employees may support political parties and candidates but must not contribute or donate QBE funds, products, services or other resources for any political cause, party or applicant without the appropriate approvals. Political contributions or donations on behalf of QBE are only permitted in limited circumstances, must comply with applicable laws, be disclosed in accordance with regulatory requirements and must not be, or give the appearance of being, used for any illegal or improper purpose.

Talking to regulators

Our regulatory liaison approach is transparent, professional and courteous and we promote a 'no surprise' environment.

- It is important that you follow local guidance or procedures when engaging with regulators. This may include notifying your local Regulatory team when you receive any communication or request from a regulator.
- To support regulators most effectively with their work, employees should have sufficient experience and seniority to lead the engagement. Group and/or your local Regulatory or Compliance team are here to support all colleagues with regulatory requests and reporting.



Refer to the Group and AUSPAC Political Donations Policy for further information.



Market integrity

QBE is committed to ensuring market integrity in the conduct of our businesses. QBE respects all applicable competition, antitrust and market conduct laws and expects staff to ensure that financial market integrity is maintained. Market abuse, including insider trading and market manipulation, distorts the fairness and transparency of the financial markets and is strictly not permissible under any circumstances, with implications for anyone involved.

Insider trading

Insider trading involves a person trading in securities while possessing inside information. Insider trading is illegal, unethical, and is prohibited.

Securities include shares, debt instruments and financial products created by third parties in relation to securities.

Inside information is any information known by you that is not generally or publicly available and that, if it were generally available, a reasonable person would expect it to have a material effect on the price or value of QBE securities or the securities of any other company.



For further guidance, including the definition of Closely Related Party, refer to the QBE Group Securities Trading Policy.

'Inside information' includes information relating to:

- Material claim or other unexpected liability.
- Financial performance.
- Actual or proposed new share issue or change to capital structure.
- Significant change in senior management.
- Material acquisition or disposal of assets.
- Actual or proposed takeover or merger.
- Entry into or termination of material contract.

If you possess inside information, you (or your Closely Related Parties) must not:

- Subscribe, buy or sell QBE securities for yourself or another person.
- Trade QBE shares that you receive under an incentive scheme.
- Communicate inside information (including 'tips') to any person who trades on the information or further communicates that information to someone else who then trades on it.

The following rules apply to everyone at QBE:

- Never use inside information to trade in securities. Doing so may result in you incurring criminal or civil penalties and will jeopardise your employment.
- Never buy or sell securities of other companies using non-public information you have obtained through your QBE role.
- You can't avoid these prohibitions by asking another person to trade for you.
- Always keep inside information confidential. Do not share inside information with anyone else, including your family and friends.



Financial crime

Financial crimes are socially corrosive and have a profound and adverse effect on people, businesses, and communities. At QBE, we are committed to the highest standards of integrity and do not condone any criminal activity.

We proactively manage financial crime risks by conducting business with integrity and in a manner that:

- Complies with global sanctions and all applicable laws and regulations wherever we operate.
- Rejects all forms of bribery and corruption.
- Remains vigilant to the risks of both internal (staff) and external fraud, as well as cybercrime.
- Safeguards our products and services against being exploited to generate and launder proceeds of crime, or to finance terrorism.

Your role in preventing financial crime: It is crucial to remain alert to activities and situations where financial crime can occur. If you encounter or suspect any suspicious or actual criminal activity, you must report it immediately through the appropriate channels. These include your People Leader, People or Employee Relations teams, local Compliance or Financial Crime teams, or via the Ethics Hotline.

If you have any questions or concerns about financial crime, do not hesitate to contact your local Compliance team



How we conduct our business

Sanctions

Sanctions are legal measures taken by governments and international organisations such as the United Nations, to restrict trade, travel or economic activity. These measures are typically enacted to protect national security interests and/or to advance foreign policy objectives.

You must never engage in any activity that violate sanctions. Adhering to sanctions is not only a legal requirement but also a crucial aspect our commitment to ethical business practices. Violating sanctions can result in severe legal and reputational consequences for both you and QBE.

[See the Group Financial Crime Framework and your divisional sanctions policies and procedures for more information.](#)

Anti-money Laundering and Counter-Terrorism Financing (AML and CTF)

QBE is committed to upholding its role in preventing money laundering and countering the financing of terrorism. This may involve undertaking customers and supplier due diligence, transaction monitoring, and alerting authorities about any activity that appears suspicious or varies from legal obligations as per local requirements.

All QBE employees must comply with the Group Financial Crime Framework and supporting divisional anti-money laundering and counter-terrorism financing guidelines, policies and procedures (where applicable). If you identify potentially suspect behaviour, promptly inform your local compliance officer.

[For further details, please refer to the Group Financial Crime Framework and your divisional AML and CTF guidelines, policies or procedures, or contact your local compliance officer.](#)

Anti-Bribery and Anti-Corruption

At QBE, we conduct business with the utmost integrity, rejecting all forms of bribery and corruption. The following apply to everyone at QBE, across all interactions with both public officials and private citizens.

- Never offer or accept a bribe—for example, to retain or obtain business.
- Never offer, give, demand, or accept financial or other favours from any person, including government officials, in return for favourable treatment, advantage, or to influence a decision. This includes the exchange of gifts and entertainment.
- Never offer or pay facilitation payments intended to expedite or secure routine governmental actions, such as processing permits, licences, or other official documents.

[See the Group Financial Crime Framework and your divisional anti-bribery and corruption policies and guidelines for more information.](#)

Fraud

At QBE, we must remain vigilant against fraudulent activity from all sources, including by customers, external parties, employees and other internal stakeholders.

You must never misuse your position for fraudulent or illegal purposes. This includes misappropriating or illegally concealing, diverting, or obtaining money, assets, data, information, or services to obtain a benefit that you or someone else is not entitled to.

Disciplinary action, which may include termination of employment, may be taken against anyone found to be involved in theft, fraud or other dishonest behaviour, irrespective of whether the behaviour is work-related.

[See applicable local fraud policies for more information.](#)



Our working environment



Health and safety

QBE is committed to providing a safe and healthy work environment for our people and those we work with.

Everyone at QBE has a responsibility to:

- Work safely, be fit and well for work, and care for the health and safety of those around us.
- Call out and report (to your People Leader and/or local WHS team) hazards, incidents and work-related injuries in a timely manner. This includes stopping the work of our colleagues if we think they may be putting their health and safety at risk or risking that of others.

For example, if you fall over at work due to a slippery floor you should report the fall to your People Leader without delay. Detail any injuries and show building maintenance where you fell.

The obligation to report and stop work extends to where you believe you're being placed in a threatening or heightened risk situation. For example, where you may be out in the field in a high-risk environment.



Refer to the [Group Work Health and Safety Policy](#), and any local policies, guidelines and procedures for further information.

Corporate security

QBE is committed to protecting our people and assets.

Corporate security works closely with and engages business units and stakeholders across our operations to maintain a safe and secure work environment. We act to mitigate security risks by implementing robust security practices as and when required, and monitoring and responding tactically to any risk or threats.

Security is everyone's responsibility and we all should call out and report matters that we feel compromise our safety or security.

If you feel it is safe to do so, challenge any person in a QBE workspace who is unfamiliar to you and not displaying their QBE ID. Do not let anyone follow you into the office area without swiping their own access card, or report to Security.



Assets and information



Data protection and information security

Data and information (or 'cyber') security is essential in an increasingly digital economy and workplace.

We know that data is a key strategic asset that enables better decision making. It helps us understand our customers and results in superior products and services.

Managing our data effectively and efficiently and governing it through its lifecycle helps create sustainable value. Everyone at QBE is required to adhere to our Group Information Security Policy, Group Acceptable Use Policy and Data Classification and Handling Standard. These policies and standards are designed to ensure our systems, data and information are used in a safe, secure, and productive way.

QBE recognises the potential for rapidly developing Artificial Intelligence ("AI") technologies to transform how we work. QBE is committed to harnessing the potential of AI responsibly, ethically, and safely. Everyone at QBE is required to adhere to our AI Governance Policy and Standard and follow the boundaries and approaches we set to keep our customers, employees, and stakeholders safe and mitigate risks.

QBE has multi-layered security defences to protect our information and IT systems, conducts monitoring to identify any unacceptable or suspicious behaviour and events, and responds quickly to suspected information security threats and incidents.



Assets and information

We all play an important role protecting QBE; the small decisions you make can have a big impact.

- Immediately report any suspected data breach, unauthorised access or unusual activity to the IT Service Desk.
- Don't visit suspicious websites, or download or install unauthorised software.
- Never leave equipment unattended, anywhere. Maintain and clean desk and lock your workstation when away from it.
- Don't allow anyone else to access your devices. Lost or stolen devices must be reported to the IT Service Desk as soon as possible.
- You are responsible for any actions undertaken using your QBE account. Passwords must never be shared, written down or stored in an unprotected format, for example on a note in a laptop bag or in an unencrypted document. It is never acceptable to disclose a QBE username or password to anyone else.
- You are responsible to ensure you do not share data relating to customers, employees or individuals, or any QBE confidential/sensitive information with unapproved third-party sites.



Learn more about your cyber security responsibilities by visiting Secure@QBE on QUBE.



If you receive an email or message, you find suspicious, always report it. Reporting assists QBE to manage threats and protect the broader organisation. Report suspicious emails by using the 'Report Phishing' button in Outlook or by forwarding the email to hoax@qbe.com



Assets and information

Intellectual property

Intellectual property (IP) is the product of our creation and protecting it is essential to any organisation's competitive advantage.

This includes patents, copyright, trademarks and trade secrets.

We closely monitor to make sure QBE's IP is properly identified, protected and used. Unauthorised use of our IP is prohibited and taken seriously. It is also important we respect the IP of others, such as our suppliers, customers and competitors.

Rules that apply to everyone at QBE:

- QBE owns all material that relates to your employment. This includes any IP you create as part of your employment, even if the material was developed in your own time or at home.
- You can't use QBE's IP for private purposes without first obtaining written permission from people with appropriate authority at QBE.
- Only use the IP of others when authorised.
- Do not take for yourself any opportunities that belong to QBE or that are created using QBE property or information.

Records and accounts

To maintain our success and reputation it is important that we comply with relevant legislation, regulations and generally accepted accounting principles. We are open and honest and will disclose relevant information to authorities and the markets as required. It is vital that our records:

- Correctly record and explain transactions and the financial position and performance of our business.
- Enable financial statements to be prepared and audited in accordance with legal requirements.

Therefore, all transactions must be appropriately authorised and recorded in our systems and supported by documentary evidence so they can be reported honestly. All funds and bank accounts need to be reflected in official records and no 'off book' transactions are allowed.

You must not knowingly keep, create, modify, move or remove records (or knowingly assist anyone else to do the same) to intentionally misrepresent or hide the true nature of a transaction or event.

Records retention

QBE is required to retain certain records for minimum statutory periods, as mandated by law. Failure to comply with these requirements can result in serious consequences. Equally, retaining records beyond their required period, when they are no longer needed for their original purpose, can also pose significant risks, particularly when those records contain personal data.

Records that include personal data are considered higher risk, as they contain details about identifiable individuals. Privacy laws often impose specific obligations regarding the retention and disposal of such information.

Where QBE is legally required to retain records, those records, including any personal data, must be retained in full. However, appropriate measures must be taken to ensure that personal data remains confidential, protected and is used only for permitted purposes. Everyone at QBE is responsible for:

- Ensuring records are collected and retained only when there is a valid business or legal purpose.
- Disposing of records once they are no longer needed for a valid purpose and there is no legal obligation to retain them.
- Ensuring that, when records are disposed of, personal data is handled securely, so that individuals can no longer be identified from the data.



External communications and reputation management

QBE's reputation is built on trust and respecting all stakeholders. We demonstrate that by communicating clearly, honestly and responsibly.



More information can be found in the External Communication and Reputation Management Policy.

This approach applies to communications with the media, investors, regulators and the wider community. It covers updates on our operational and financial performance, our continuous disclosure obligations, and any material information that may affect how the market views QBE. It also includes commentary on how QBE contributes to the communities in which we operate, and how we are delivering on our purpose.

QBE actively manages its reputation through the Corporate Affairs team, aiming for balanced coverage of what we do, building awareness of our capabilities and minimising reputational damage through managing risk, issues and incidents. This includes the way we engage with external audiences at industry events and conferences plus what we say about QBE in award submissions.

Only designated individuals in specific roles, and approved external communicators are permitted to communicate on behalf of QBE.



Summary



Summary

Know your responsibilities

Everyone at QBE has to use good judgement, uphold our standards of professionalism and work in a manner that complies with the spirit and requirements of this Code.

This means you are responsible for:

- Reading, understanding and complying with this Code and the QBE policies, standards, or procedures that apply to your role.
- Declaring each year, as part of the ME@QBE process, that you have complied with this Code.
- Completing all mandatory training assigned to you.
- Seeking advice from your People Leader or your local People or Compliance team if you are unsure how to proceed or make a decision.
- Speaking up without delay and reporting any conduct or activity you believe is dishonest, unethical, corrupt, inappropriate or illegal. This may include reporting your own observations, those made to you by others, and instances where the conduct of one of QBE's business partners does not meet the standards set by the Code.
- Cooperating with and being honest in any internal investigations.



Summary

Know the consequences

Breaches of this Code are taken seriously, and will be reviewed to determine if, and what, consequences should be applied.

- Consequences that may apply could range from informal coaching and development, through to a warning, an impact on remuneration, or termination of employment in the case of more serious breaches. Consequences will be determined in accordance with the Group Consequence Management Policy.
- If we are required to investigate a breach of this Code, you may be asked to step down from your position and duties until that investigation is complete.
- You will be afforded a process that is fair and respectful, and in accordance with the Group Consequence Management Policy.
- QBE will comply with legal obligations where we have to report incidents, including breaches of this Code, to regulators and law enforcement agencies.
- We will record any consequences applied for breaches of this Code and may publicly report high level outcomes whilst respecting applicable privacy requirements.

Oversight

QBE's Code is endorsed by the Group Board of Directors. Group and Divisional Boards, and QBE management globally are responsible for overseeing compliance with the Code.

Seek further information and assistance

If you are unsure about any aspect of this Code, please speak to your People Leader in the first instance.

It is your responsibility to maintain awareness of QBE policies and to comply with them. Claiming ignorance of the law or our stated requirements is no defence.



Group Policies are available on the Group Governing Documents Portal on QUBE. See your local QUBE pages for Divisional Policies. QUBE contains other relevant information that supports this Code, including the Global NI Authorities Portal which provides information to help you understand your authority levels.



Glossary

Customer

QBE defines Customer as the person or entity insured in accordance with the terms of an insurance policy issued by QBE. See the Customer@QBE Framework for more information on showing up and delivering for customers.

Gifts and entertainment

Something of value given or received in the form of a gift or entertainment. It can be, but is not limited to, actual items (e.g., wine or chocolates), tickets to an entertainment event (e.g., racing, sporting events, or concerts), meals or beverages, travel and accommodation or offers of free or pro bono services from suppliers.

Stakeholders

References to stakeholders includes our partners, customers, shareholders and employees.

Social media

Internal social media includes QBE tools and platforms like Viva Engage (formerly known as Yammer). External social media sites include Facebook, LinkedIn, X (formally known as Twitter), and Instagram plus sharing platforms such as SlideShare and TikTok.

'Under the influence'

This means you are incapable of operating as an ordinary, prudent, and cautious person can or would.



