

# WHISTLEBLOWER GUIDELINES

MetLife Europe d.a.c.  
MetLife Europe Insurance d.a.c.  
MetLife Europe Services Limited  
MetLife Services EEIG  
(herein know as the “Company”)

The goal of this Whistleblower Guidelines is to ensure any concerns regarding any misconduct or improper state of affairs or circumstances in relation to the Company’s business are raised and are dealt with effectively, securely, appropriately, and in line with Irish Protected Disclosures Act 2014 & The Protected Disclosures (Amendment) Act 2022. These guidelines should be read in conjunction with the Company wide Whistleblowing policy and Irish Addendum

## **Who may submit the report?**

- Employees, Associates, Trainees (paid or unpaid)
- Person working under the supervision and direction of contractors (incl. self-employed), subcontractors, agency worker, vendors.
- Shareholders, Executive and Non-executive directors (Board member)
- New employees who have not yet commenced work (Job applicant)
- Volunteers
- Third persons concerned with a reporting person who could suffer work-related retaliation (colleagues or relatives of the reporting persons)
- Facilitators (someone who assists a person in the reporting process in a work-related context)
- Legal entities that the reporting person is connected to in a work-related context (either own or work for).
- Individuals who acquire information on relevant wrongdoing during recruitment process and/ or pre – contractual negotiations.

## **Which cases may be reported?**

Relevant wrongdoings might be any of the following:

- Criminal offences
- Failure to comply with a legal obligation (other than your contract of employment)
- Miscarriage of justice
- Endangerment of health and safety
- Damage to the environment
- Unlawful or improper use of public funds
- Oppressive, discriminatory or behaviour or behaviour that constitutes gross mismanagement by a public body
- Breaches of EU law
- Concealing or destroying evidence of wrongdoing

### **Who is designated person for the Company?**

Faten El Hajj, Head of Compliance MetLife Europe d.a.c. and MetLife Europe Insurance d.a.c who is positioned to follow-up on reports, who will maintain communication with the reporting person and, where necessary, request further information from, and provide feedback to, that reporting person.

### **How is a report submitted?**

Report could be submitted through:

Internal Reporting Channels established by the Company:

**Ethics & Fraud HelpLine:** phone numbers are listed at the end of this document or Internet using the following link: <https://secure.ethicspoint.com/domain/media/en/gui/61798/index.html>

**Meeting with the Head of Compliance** (in Dublin Office).

External Reporting Channels established by national authority as designated by local regulation to receive reports and investigate whistleblowing concerns.

The Company encourages to report breaches through internal reporting channels before reporting through external reporting channels so that the breach can be addressed effectively internally and where the reporting person considers that there is no risk of retaliation.

### **Can report be submitted anonymously? Would it be confidential?**

- MetLife Ethics & Fraud HelpLine is a **confidential** channel available 24 hours a day, 365 days a year.
- Reports can be made **anonymously** online or by phone. The HelpLine is administered by a third party. Reporting Persons are not tracked. The HelpLine does not trace phone calls or use Caller Identification. In addition, it does not generate or maintain internal connection logs containing Internet Protocol (IP) addresses, so no information linking your computer to the Ethics & Fraud HelpLine would be available if you choose to make a report online. Reports from the Reporting Person 's computer would come through a secure Internet portal which does not trace or show user screen names. Phone calls with the Ethics & HelpLine are not recorded.
- During meeting with the Head of Compliance, the reporting person has the right to declare that they want to remain **anonymous**. The conversation is **confidential**.

### **Can identity of Whistleblower be disclosed?**

- The rule is that Whistleblower's identity is not disclosed by Whistleblowing Complaints Handler. But there are some limited exceptions:
- To the person whose involvement in the investigation is a must when the case cannot be resolved without disclosing identity of the Whistleblower under the condition that this person will be obliged to keep confidentiality
- The Company is legally obliged to disclose the identity of the Whistleblower when it is necessary and proportionate, in particular in the field of investigations conducted by competent authorities or in court proceedings including with a view to safeguarding the rights of defence of the person concerned; and
- Based on the Whistleblower explicit consent.

In such cases, the Whistleblowing Complaints Handler will inform the Whistleblower of this, unless the provision of such information would jeopardize ongoing investigations or legal proceedings or the authority conducting the proceedings prohibits the provision of such information.

The Company is expected to keep anonymity; however, it requires cooperation from the Whistleblower. Without any impact on Whistleblower protection, the Whistleblower is obliged to refrain from discussing the details of the reported

breach and the proceedings conducted in this respect with anyone other than the Whistleblowing Complaints Handler and/or Authorized Persons, unless it was agreed with them differently or as it is required in accordance with law.

### **What could Whistleblower do, if no appropriate action was perceived to have been taken as a result of the report?**

If the person first reported through Internal and External Reporting Channels but no appropriate action was taken in response to the report within the set timeframe or the person has reasonable grounds to believe that the breach may constitute an imminent or manifest danger to the public interest, such as where there is an emergency or a risk of irreversible damage, the person may make a public disclosure.

### **Are all Whistleblowers protected?**

Whistleblower who has:

- reported the breach in scope of the EU Whistleblowing Directive,
- reasonable grounds to believe that information on the breach reported was true at the time of making the report and
- reported breach either internally or externally or made a public disclosure

will be afforded Whistleblower protections in line with the local legislation implementing the EU Whistleblowing Directive.

### **What is the scope of Whistleblower protection?**

Scope of Whistleblower protections include:

- prohibition of any form of retaliation
- no liability if they had reasonable grounds to believe that the reporting or public disclosure of such information was necessary for revealing a breach.
- no liability in respect of the acquisition of or access to the information, which is reported or publicly disclosed, provided that such acquisition or access did not constitute a self-standing criminal offence.
- no liability arising from acts or omission unrelated to the reporting or public disclosure.
- in court proceedings, the burden of proof is on the Company to show that it has not retaliated. Where there is an allegation of retaliation for making a report, it is for the person grounds.
- effective remedies must be available, including the possibility of interim relief, as well as remedies and full compensation for any damage suffered by a person who makes a report.
- in legal proceedings including, defamation, breach of copyright, secrecy, data protection rules, disclosure of trade secrets, reporting person should not incur liability provided they had reasonable grounds to believe that the reporting was necessary for revealing a breach.

### **What are the forms of retaliation?**

Retaliation (including attempts thereof) covers:

- Suspension, lay off, dismissal or equivalent measures
- Demotion or withholding of promotion
- Transfer of duties, change of location of place of work, reduction in wages, change in working hours
- Withholding of training
- A negative performance assessment or employment reference
- Imposition or administering of any disciplinary measure, reprimand or other penalty, including a financial penalty;
- Coercion, intimidation, harassment or ostracism;
- Discrimination, disadvantageous or unfair treatment;
- Failure to convert a temporary employment contract into a permanent one, where the worker had legitimate expectations that he or she would be offered permanent employment;

- Failure to renew, or early termination of, a temporary employment contract;
- Harm, including to the person's reputation, particularly in social media, or financial loss, including loss of business and loss of income;
- Blacklisting on the basis of a sector or industry-wide informal or formal agreement, which may entail that the person will not, in the future, find employment in the sector or industry;
- Early termination or cancellation of a contract for goods or services;
- Cancellation of a licence or permit;
- Psychiatric or medical referrals.

**Which piece of legislation describes Whistleblowing?**

Irish Protected Disclosures Act 2014 & The Protected Disclosures (Amendment) Act 2022.

**Which Ireland authority is competent for Whistleblowing related to the Company activity?**

Central Bank of Ireland is a prescribed person for the Company business. Where a worker wishes to make a report to the Central Bank of Ireland under the 2014 Act relating to breaches by their employer, they may make the disclosure through the following channel:

Protected Disclosures Desk

***Central Bank of Ireland***

Dublin 1

PO Box 559

Dublin 1

Tel: 1800 130 014

Email: [confidential@centralbank.ie](mailto:confidential@centralbank.ie)

How will the Whistleblowing report be handled?

Report	Report submitted in good faith, Reported channel is at Whistleblower discretion Include sufficient level of details (e.g. Company name, persons involved, description of the potential breach, place date and any possible evidence)
Reaction	The Whistleblower receives an acknowledgement of receiving report within 7 days from date of submission by the Whistleblowing Complaints Handler. The Company may close the case if there is no sufficient information and there is no possibility to obtain them from the Whistleblower.
Investigation	The Company is committed to thorough and timely investigations of the report Maintaining contact between the Whistleblowing Complaints Handler and the Whistleblower (if possible) during investigation is very important in order to clarify all the circumstances in timely manner.
Report	After closing the investigation, feedback is provided to the reporting person/Whistleblower Feedback must be provided in a reasonable timeframe (not exceeding 3 months from the acknowledgement of receipt of the report or from the date expiration of the 7 days period for delivery of the acknowledgement if not delivered)

Ethics & Fraud HelpLine - Branches telephone numbers

Reports to the Ethics & Fraud HelpLine may be made using the following telephone numbers

Bulgaria	00-800-0010	Italy	800-172-444
Cyprus	80077095	Portugal	800-800-128
Czech Republic	800-144-315	Romania (Telekom Romania)	0808-03-4288
France	0 805 11 25 41	Slovakia	0-800-000-101
Hungary	06-800-011-11	Spain	900-99-0011
Ireland (UIFN) (Airtel, Meteor, O2)	00-800-222-55288	United Kingdom	0800 102 6553
Ireland	1-800-550-000		

At the English prompt dial 888-320-1671.

A full list of phone numbers from each country could be found

<https://secure.ethicspoint.com/domain/media/en/gui/61798/phone.html>