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FWD Code of Ethics and Business Conduct

v.5.0



Introduction from CEO

At FWD, we are in the business of insurance—but more importantly, we are in the business of helping people. Every day, we support our customers in managing financial uncertainty and planning for their future. Each decision we make and every transaction we carry out can have a real impact on people's lives. With that impact comes a deep responsibility to act with integrity and care.

That is why we hold ourselves to the highest ethical standards through **FWD's Code of Ethics and Business Conduct ("Code")**. This Code is more than a set of rules or policies. It reflects the principles that guide how we work, how we make decisions, and how we treat one another. It applies to all of us—employees, officers, directors, and our partners such as agents, distributors and contractors—as members of a trusted and reputable insurer across Asia.

The Code also sets out what we expect of one another and reinforces the standards of behaviour that our customers, stakeholders and the public rightly expect from FWD. Simply put, it supports our commitment to building a culture of integrity, where we **do the right things right**, every time.

As FWD continues to grow and mature, we have strengthened this Code to more clearly reflect our approach to strong governance, ethical business practices and transparent decision-making. It also underscores the importance of understanding the consequences of our actions and the impact they have on those who place their trust in us.

Whether you are new to FWD or have been part of our journey for some time, I encourage you to read this Code carefully, live by its principles, and always consider how your actions affect our customers, our stakeholders and each other.

Please remember that you are not alone in navigating ethical questions. Your colleagues, managers and leaders are here to support you. If you are ever unsure how to handle a situation or have concerns, the resources outlined in this Code are available to you, and any disclosures will be handled with the utmost care and confidentiality.

Our collective commitment to this Code will help us continue to build a stronger FWD—one that attracts great talent, earns the trust of our partners, and builds lasting relationships with our customers.

Thank you for your continued commitment to **doing the right things right**.

Best regards,



Huynh Thanh Phong
Group Chief Executive Officer
FWD Group

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Remember to always do the right things right!



Introduction to our Code

Introduction to our Code

We have developed this Code to provide guidance and to demonstrate our commitment to building and sustaining a strong risk culture as an integral part of FWD's overall organisational culture. This risk culture is grounded in ethical, transparent and responsible behaviour and underpins how we conduct our business and make decisions. The Code forms a core element of our risk culture framework and reflects our dedication to sound governance and effective risk and compliance management, the fair treatment of our customers, respect for human rights, and the long-term sustainability of the communities we serve.

Achieving these standards require the personal commitment of everyone who represents FWD. Each of us is expected to understand this Code, apply its principles consistently in our daily work, and take responsibility for identifying, managing and escalating risks in a timely and appropriate manner. By embedding these behaviours into how we work, we reinforce the values and conduct that define our organisational culture and demonstrate that ethical decision-making is fundamental to the way FWD operates.

While no Code can address every situation or challenge we may encounter, we believe that the principles outlined here will help you exercise sound judgement and make informed, ethical decisions when faced with circumstances that require careful consideration.

This Code applies to all employees, officers, and directors of FWD as follows:

- All FWD companies, affiliates and subsidiaries.
- All FWD permanent, part-time, temporary and contract employees, and contingent workers.
- All FWD directors, officers, supervisors and managers are expected to abide by the letter and spirit of this Code and any applicable contractual provisions when carrying out their obligations under their contracts with FWD.
- All agents, distribution partners and third-party business partners such as suppliers and contractors are also expected to abide by the standards set in this Code and to any applicable contractual provisions when performing services for or on behalf of FWD. We expect our third-party business partners to act with the highest standards of professionalism and to ensure compliance with all applicable laws regulations while acting on our behalf, including without limitation, avoiding all forms of corruption and bribery, fair dealing with our customers, and protecting privacy of our customers.

Any employee, contingent worker, agent, distribution partner or third-party business partner who believes that a situation may warrant an exception or waiver on the applicability of the Code should contact the Group Chief Compliance Officer. Any waiver of compliance with the Code for executive officers or directors shall be approved only by the Board of Directors or to a Board Committee specifically designated to grant such approvals. Any such waiver of compliance granted by the Board shall be disclosed in accordance with applicable rules and regulations.

Your personal commitment

Obeying the law because it is the right thing to do is the foundation on which our ethical standards are built. Thus, you are expected to be familiar and to comply with the Code and applicable laws and regulations in conducting the business of the company, including relevant securities laws and regulations.

You will be given access to this Code when you commence your employment or appointment with us and will be required to complete all mandatory Compliance trainings. You will also be required to complete an online assessment and recertify your awareness of the Code and its contents on an annual basis. The Code needs to be read in conjunction with the more detailed policies at the Group or country level.

You are accountable and responsible for fully understanding and complying with the Code and applicable laws, regulations, internal policies and guidelines related to your daily work.

If you fail to comply with the standards contained in this Code, relevant laws, regulations and internal policies and guidelines, or encourage or procure non-compliance of others, you may be subject to disciplinary action up to and including dismissal, and possibly face legal or other consequences. Failing to promptly report known violations may also constitute a violation of this Code. 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 right tone, lead by 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 promptly and consistently on reports of suspected violations. 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

Speak up - where to go for help?

A culture of honesty includes our ability to speak up when we feel that something is wrong. We expect our employees, officers, directors and third-party business partners to report any concerns if they observe or suspect misconduct within FWD.

You may choose to remain anonymous when you file your concern and we will 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. A report is made in good faith where the employee reasonably believes the information to be true, makes the report in the best interests of FWD, and provides all relevant information known at the time.

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

via Speak Up Online or Speak Up Hotline (operated by an independent third party)

URL: Speak Up Online
www.fwd.com/SpeakUp

- Cambodia – 2396 2515
- China – 400-120-0253
- Hong Kong – 800-902-023
- Indonesia – 021-29223057
- Japan – 0800-100-0081
- Macau – 6262-5093
- Malaysia – 01548770361
- Philippines – 2-86263210
- Singapore – 3158-7652
- Thailand – 021056128
- Vietnam – 028-44581010

Non-retaliation

FWD is committed to maintaining a culture of honesty, integrity, and open communication, where employees are encouraged to speak up without fear of retaliation. FWD strictly prohibits any form of retaliation against any employee who, in good faith, raises a concern, reports an actual or suspected breach of this Code, applicable laws or regulations, or FWD policies, or who assists or cooperates in any review or investigation. Any employee, officer, or director who engages in retaliatory conduct will be subject to disciplinary action, up to and including dismissal or termination of employment or appointment.

Duty to cooperate in reviews or investigations

All employees have a duty to cooperate with any internal or external reviews or investigations. Employees are expected to act with honesty, integrity, and professionalism, and to provide information that is truthful, accurate, complete, and timely, to the best of their knowledge.

Failure to fulfil this duty may result in disciplinary action, up to and including dismissal or termination of employment or appointment, in accordance with applicable policies and law. This does not apply to good-faith errors or misunderstandings, provided the information is promptly corrected once the employee becomes aware of the inaccuracy.



More information can be found in the FWD Whistleblower Policy

Grievance reporting

FWD encourages employees to raise work-related concerns or grievances promptly so they can be addressed fairly and constructively. **Grievances** generally relate to an employee's personal employment situation or workplace relationships and **should be raised through Human Resources or management channels**, in accordance with applicable HR policies and procedures.

Grievances include, but are not limited to, matters such as compensation or benefits, performance evaluations, promotions, working hours or leave, workplace relationships or interpersonal issues, management or communication concerns, and other personal work-related matters that do not involve serious misconduct, illegality or breaches of laws or regulations.

Where a concern is raised through an incorrect channel, it may be redirected to the appropriate process.



More information can be found in the FWD Disciplinary and Grievance Policy



Our guiding business principles

Our guiding business 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** which shape how we carry out our work, how we treat our customers, business partners, and each other, and how we uphold our responsibilities to the communities in which we operate. By applying these principles consistently in our day-to-day actions and decisions, we exercise sound judgement, manage risk responsibly, and ensure that we Do The Right Things Right in everything we do.

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



Honesty and integrity

Acting with honesty and integrity means that you:

- comply with all governmental laws, rules 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.
- handle actual, perceived, or potential conflicts of interest between personal and professional relationships in an ethical manner.
- do not tolerate dishonest or unethical behaviour from anyone.



Be in formed 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 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.



Open and clear communication

Communicating 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 full, accurate, timely and understandable reports and information to requesting parties when legally obligated to do so.
- promptly raise concerns about possible fraudulent or unlawful activity to your manager and to the Compliance department.



Professionalism and respect

Acting with professionalism and respect means you:

- comply with all governmental laws, rules 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.
- handle actual, perceived, or potential conflicts of interest between personal and professional relationships in an ethical manner.
- do not tolerate dishonest or unethical behaviour from anyone.



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.
- take into consideration the use and procurement of environmentally preferred products and services.
- support our local communities, charities and causes that make a difference.
- are committed to respect and promote human rights.
- do not tolerate the use of child or forced labour and/or exploitation of children in any business operations.



1. Honesty and integrity



Honesty and integrity

Acting with honesty and integrity means conducting ourselves with sincerity and upholding the highest ethical standards in every aspect of our business and earn the trust of our stakeholders at every step of the way.

Honesty and integrity



Acting with honesty and integrity means we follow all applicable governmental laws, rules and regulations 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 all forms of corruption as a way of building our business. We have zero tolerance on corrupt practices such as bribery, embezzlement, extortion, influence peddling or facilitation payments.



Anti-bribery and corruption laws also prohibit creation of inaccurate or false books and records and they require companies to develop and maintain adequate controls regarding corporate assets and accounting.



Bribery and corruption are prohibited by several laws applicable to FWD including the Prevention of Bribery Ordinance (Hong Kong). You should also follow the applicable anti-bribery and corruption laws and policies in place in your country.



Anti-bribery and corruption laws prohibit us from offering, giving or receiving or promising to offer, give, or receive anything of value to another person in order to retain business or otherwise 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 another person in order to retain business or otherwise 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 un-tariffed payments made to speed up, obtain or secure an obligation that is already owed to us. We are likewise prohibited from engaging in extortion acts, which involves exploiting fear or vulnerability to gain an unfair advantage or benefit.



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-bribery and corruption legislation often focuses on improper payments to them and the penalties for such payments can be severe.



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 in whole or in part by a government may also considered government officials and any improper payments to them are still violations of the law.



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, the Compliance team or use the resources available for more information.

Anti-fraud corporate culture



FWD has no appetite for behaviors and decisions that knowingly lead, or are likely to lead, to unfair customer outcomes, regulatory intervention, breach of code of conduct or reputational damage. All of us are responsible to act ethically and report suspected fraud.



We must all ensure that customers, agents, and suppliers do not exploit their relationship with FWD or use FWD's name in connection with any fraudulent, unethical or dishonest transaction.



Our employees must never commit fraud. Everyone at FWD is responsible for helping us prevent and detect fraud. If you notice or suspect of fraud, including expense claims, procurement, auditing or accounting irregularities, etc., or if you experience pressure to commit fraudulent behaviour, including from your manager or supervisor, you must discuss the situation with Compliance or Human Resources, or report via the FWD Speak Up Online or Speak Up Hotlines. Information relating to the reported fraud must be kept strictly confidential.

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 may be deemed as 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 making a reference to FWD.

Am I doing the right things right?



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 or even perceived as a bribe. We want to get the job done but only if we Do The Right Things Right and making a facilitation payment or bribe is not just inappropriate but may even constitute a criminal act.

Gifts and hospitality

Exchanging common business courtesies is 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 or receive do not amount to bribery or give the appearance that we are exchanging courtesies to gain any improper business advantage.

Gifts and hospitality are permitted when they are:

1. Exchanged as part of the promotion or demonstration of one our products or services
2. Of nominal value (not lavish or overly expensive)
3. Infrequent
4. Unsolicited
5. Reasonable, ordinary, customary and lawful in the country or region where they occur
6. Not exclusive (commonly handed out to clients)

Gifts and hospitality (whether giving or receiving)

Acceptable forms of gifts and hospitality include:

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



Prohibited forms of gifts and hospitality include:

Lavish gifts or gifts over US$1,500 in value



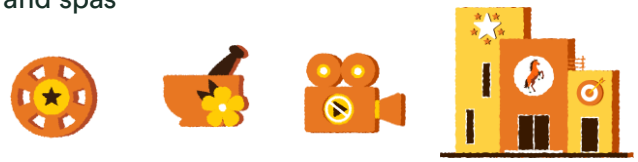
Expensive meals and drinks



Gifts / entertainment exchanged in relation to any business consideration or frequently with the same person or entity



Attendance at “adult-only” establishments such as gentlemen’s clubs, gambling venues, nightclubs and spas



Gifts, hospitality, and ethical judgment

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

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

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

If refusing a gift or hospitality, e.g., lavish items, etc., 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 should surrender the gift to the appropriate department in accordance with your local policy.



More information can be found in the FWD Anti-Bribery and Corruption (ABC) Policy

Am I doing the right things right?



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 USD1,500. 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.

Question: Linda, an FWD agent, has been working with one of her customers for many years and enjoys their good working relationship. The festive season is 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 festive season 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 manage our conflicts of interest to ensure that we act with integrity and in the best interest of our customers and shareholders.

A conflict of interest occurs when an individual's private interest interferes in any way - or even appears to interfere with the interests of the organisation as a whole. It may also occur in situations where the vested interest of two parties are at odds with each other, which may influence a party from making an informed and objective decision.

Whilst it is impossible to identify all potential conflict of interest situations, at FWD, a conflict can either be considered a Personal Conflicts of Interest or a Structural Conflicts of Interest.

Individual vs customer or individual vs company conflicts are considered personal conflicts of interest and may arise in situations where an employee, director, officer or contractor has a personal interest which may influence their objective judgment at the detriment of the customer or FWD.

Structural conflicts of interest, on the other hand, arise in situations where there may be opposing interests between FWD and the customer, between FWD Group of companies, or between customers.

Personal conflicts of interest

Outside Engagement

- Working for any outside engagement or assigning other employees to assist on non-FWD related engagements or personal matters limits the resources allocated for FWD work.

Finances

- 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.
- Additionally, when an employee, officer or director, or a member of his/her family receives improper personal benefit as a result of his/her position in the company, e.g., loans to or guarantees of such persons, etc.

Relatives

- Hiring relatives or close personal friends is not prohibited but they must be evaluated and considered under the same process and criteria as other candidates. If you have a relative or close personal personal friend who is interested in working for FWD, speak to the HR department to appropriately manage the potential risk.
- Hiring relatives of government officials also pose potential conflict of interest or bribery risks.

Agents

- 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.

Partners

- Any close relationship between employees may also give rise to potential or perceived conflicts of interests - for example employees who are domestic partners, partners in outside business, manager-subordinate relationships or have financial interests in each other due to personal loans or other financial transactions.

Disclosing personal conflicts of interest

If a situation or opportunity arises that could potentially cause a conflict of interest (whether potential or actual) to your role as an FWD employee, officer or director of FWD, you must disclose the conflict of interest to your manager and Compliance.

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.

Further, you are required to complete an annual certification to affirm that you have no conflicts of interest or that any actual, potential or perceived conflicts have been timely disclosed to FWD.

Corporate Opportunities

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

Structural conflicts of interest

Company vs customer

conflict of interest may arise in situations where FWD Group (or one of FWD Group companies) potentially benefits at the detriment of the customer. Below are some examples of potential conflicts in this category:

- Remunerations and incentive structures may influence sales force and sales staff to sell insurance products with higher commissions and incentives rather than based on the needs and suitability of the customer
- FWD has a stake in a broker or financial advisor that distributes FWD products
- FWD receives from a party other than the customer an inducement in relation to a service provided to the customer other than the standard commission or fee for that service

Company vs company

conflict of interest may arise in situations where there is an intra-group conflict whereby FWD Group potentially benefits at the expense of another company within the FWD Group of companies or an affiliated company (or vice versa). Below are some examples of potential conflicts in this category:

- Investment manager invests in an asset which has an existing interest or stake by FWD Group or its majority shareholder
- FWD Group has a joint venture or stake in a company that is in direct competition with an existing business unit
- Related/ connected party transaction

Customer vs customer

conflict of interest may arise in situations where a customer (or group of customers) has the potential to benefit at the expense of another customer. Below are some examples of potential conflicts in this category:

- Financial or other incentive (e.g. premium discounts and promotions) provided to a select cohort of customers
- Investment manager allocates trades for more than one customer and fund
- Different groups of customers in participating funds

Management of structural conflicts of interest

Whilst FWD seeks to avoid and prevent perceived or actual structural conflicts of interest, it is acknowledged that in some instances, this will not always be possible. In these situations, Group Compliance will work with relevant parties to ensure that controls and processes are fit for purpose to mitigate or reduce the risks that arise from the conflict, and that the conflict doesn't harm the fair treatment of our customers or the interests of our shareholders.

Examples of some controls and processes that could be implemented to manage conflicts are provided below (not an exhaustive list):



Controls to limit the exchange and use of information: Information barriers ("Chinese walls") to prevent or restrict transfer of sensitive and confidential information between employees, FWD Group companies, or third parties involved in transactions where a conflict of interest may arise or could harm the interest of customers.



Organisational structures and segregation of duties: To ensure that potential conflicts of interest arising from the organisation of the company are prevented. These arrangements are usually defined in internal policies and procedures.



Controls over remunerations and other benefits: Remuneration policies to prevent conflicts of interest arising from remuneration and other benefits accorded or received by FWD, employees, contractors, and sales force do not bring about conflicts of interest and promotes the interests of customers in a fair and transparent way.



Annual risk assessment and review of structural conflicts of interest.

Am I doing the right things right?



Question: We have a need for office receptionist and I think my cousin would be a great candidate for the job. She 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 her 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 cousin can be hired you would need to remove yourself from the decision-making process so it doesn't appear to others that she is getting preferential treatment. She still needs to win the job based on the quality of her work and merit; not on personal relationships. Mention her 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 FWD competitors and external parties.

Intellectual property includes but is not limited to:



Business plans



Pricing information



Market research



Copyrighted information such as software, images, publications and notes

Respecting intellectual property rights means you should protect the intellectual property of others and only gather or use such intellectual property through legal and ethical means.

Gathering information about competitors properly

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



Competitor websites



Competitor annual reports



News, magazine and trade industry articles about the competitor



Web-based communities (such as internet forums and blogs)

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, the Brand and Marketing department or your Compliance team.



Am I doing the right things right?



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 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



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.

Whilst our customers are generally 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 proceeds of crime or finance terrorism.

In other instances, some 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 conduct appropriate due diligence 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, in order 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 a financial institution, 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 and verify customers, monitor customers' activities, and report suspicious or unusual activities could lead to FWD being held responsible for assisting in these crimes. Civil and criminal 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 for terrorists to 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 payouts are benefitting.

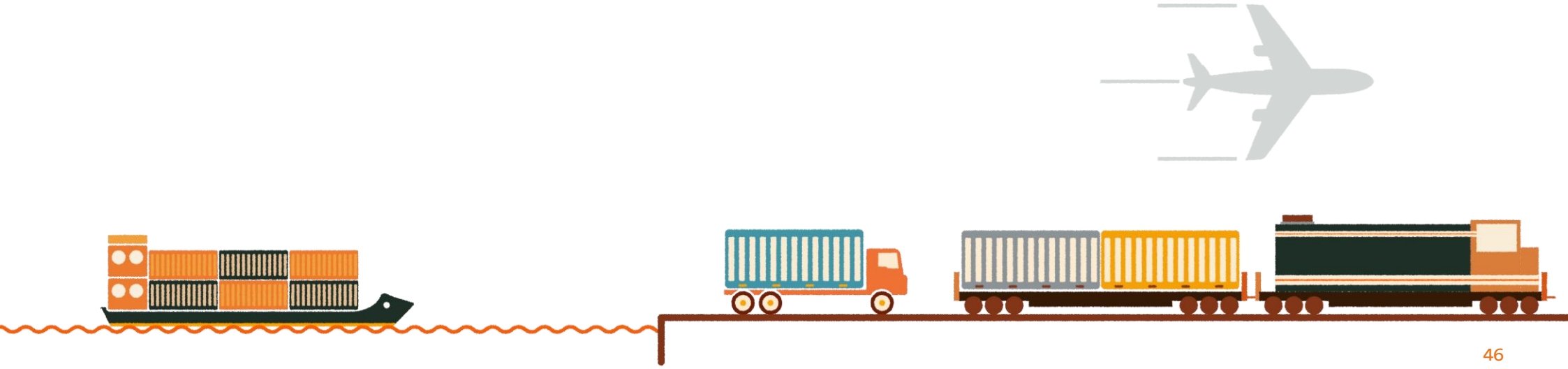
Economic sanctions

FWD is committed to complying with the sanctions laws and regulations issued by international governing bodies as well as the laws and regulations of the countries in which we operate.

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

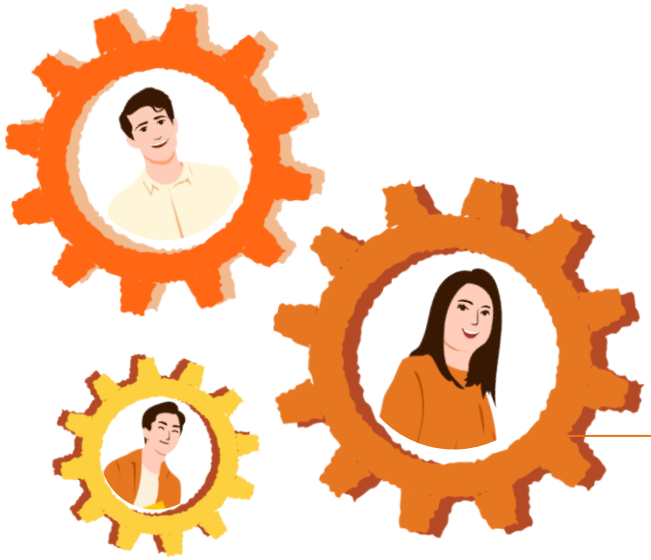
It is our responsibility to determine whether customers or their related parties are sanctioned or on any applicable watchlists.

FWD prohibits business activities that violates applicable sanctions laws or the FWD AML-CTF and Sanctions Policy. Dealing with individuals or entities subject of economic sanctions carries heavy penalties for FWD and our employees. If you have any doubt about whether a customer, supplier, business partner, beneficiary, etc. is sanctioned, you should escalate to the Group Chief Compliance Officer (or designated AML Officer) immediately.



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 entire customer journey.



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 or the Compliance department.

Am I doing the right things right?



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 (AML and CTF) and Sanctions 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 price fixing.

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:

1. Our business activities or plans
2. Customer data and insights
3. Our product pricing including premiums, deductibles, pay-outs, discounts and other price-related items
4. Any future products or marketing plans.

Am I doing the right things right?



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 Territories. 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

As employees of FWD, we may become aware of any material or price sensitive information about our company, its shareholders or officers, or other companies earlier than the public does. We cannot use such material or price sensitive information, before it is made known to the public for buying or selling securities to gain benefit. We also cannot engage in tipping off - using material or price-sensitive information to advise our friends, relatives or anyone else on trading decisions.

Information is “material” if a reasonable investor would consider such information is important in deciding whether to buy, hold or sell securities. Material information is only considered “public” after it has been broadly released to the market such as by a press release. 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.

Insider dealing or tipping can have serious consequences to FWD and the persons involved such as immediate termination, possible imprisonment and fines. Thus, if you have questions or any doubts as to the propriety of any transaction, e.g., purchase or sale of FWD securities or other company’s securities, seek advice from the Group General Counsel, Group Chief Compliance Officer or their designated officers before undertaking the said transaction.



More information can be found in the FWD Personal Insider Dealing and Market Misconduct Policy.

Am I doing the right things right?



Question: Kyra is an employee of FWD. Through her role, she becomes aware of confidential, non-public information about an upcoming FWD corporate transaction that is likely to have a significant impact on FWD's share price once it is publicly announced. Only a small number of authorised colleagues involved in the project have access to this information.

During a casual conversation, Kyra's close friend, Alex, mentions that he is thinking about investing in FWD shares. Kyra does not share any specific details about the transaction, but she is tempted to say that it might be a good time to look at FWD. Kyra also considers whether she should buy FWD shares herself before the announcement. What should Kyra do?

Answer: Kyra should refrain from buying or selling FWD shares until the information has been publicly announced and any applicable blackout or restricted period has ended. She should also avoid hinting, suggesting, or encouraging Alex (or anyone else) to trade FWD shares, even indirectly. Kyra should also keep the information strictly confidential and only discuss it with authorised colleagues on a need-to-know basis as part of her job. If she is unsure what to do, she should seek guidance from Compliance and get clarity on how the Personal Insider Dealing and Market Misconduct policy applies to her situation.



3. Open and clear communication



Open and clear communication

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 promptly report concerns or potential violations.

Conduct Risk

At FWD, we define Conduct Risk as losses arising or adverse consequences due to conducting insurance business in a way that does not ensure the fair treatment of customers, fair outcomes, or results in harm to customers.

Managing Conduct Risk is an important backbone to our culture and customer experience as it helps us identify and manage risks that could jeopardise delivering fair outcomes for our customers.

We all have a responsibility to manage conduct risk as we all create, influence and make decisions to ensure the fair treatment of our customers throughout their journey with us.

Examples of Conduct Risk:

1. Recommending a product that's not fully aligned to our customers' reasonable expectations at the point of sale
2. Sales and distribution communications or practices that are unclear, unfair or potentially misleading
3. Any unnecessarily complicated claims, complaints or cancellation process

Conduct Risk

FWD customer journey examples:

Product and pricing

Products which meet customer needs are priced fairly

Marketing and distribution

Customer facing materials which are clear, fair and unambiguous



Cancellations

Cancellations are straightforward and not highly priced

Sales/renewals

Sales and distribution practices which protect the interests of the customer

Complaints

Resolutions are clearly communicated and reached on a timely basis

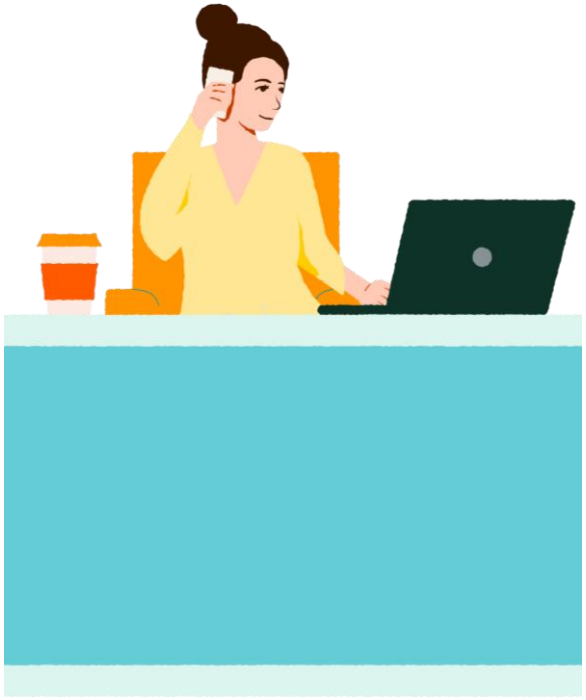
Claims

Claims are settled quickly and declinatures are clearly explained

Admin and servicing

Servicing which is fairly priced, straightforward and timely

Am I doing the right things right?



Question: A customer sent an email to FWD to cancel her existing insurance policy. Jane, who has been assigned the cancellation, is preoccupied with tying up loose ends before she goes on annual leave. Thinking of the potential impact to both FWD and the customer, how best should this cancellation request be handled?

Answer: Jane should handle the customer's cancellation request promptly, professionally and within required turnaround times, even though he is preparing to go on annual leave. In line with the Treating Customers Fairly (TCF) Policy, cancellation requests must be straightforward, timely and not create unnecessary barriers or inconvenience for the customer. Thus, Jane should acknowledge and process the cancellation request without delay and ensure continuity of service by either completing the cancellation before she goes on leave or properly handing over the case to a colleague so the customer does not experience delays or uncertainty.

More information can be found in the FWD Treating Customers Fairly (TCF) Policy

Accuracy of records

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

Maintaining accurate records helps to:

- 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 more clearly
- 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.

Where disclosures to regulatory bodies are required to be made or in other public communications made by the company, relevant employees and officers shall ensure that such reports and documents are full, fair, accurate, timely and understandable, including accurate financial and accounting data, where applicable.

We must not knowingly falsify information, misrepresent or omit material facts necessary to avoid misleading our independent auditors or investors. We must also never be dishonest or deceptive in maintaining FWD records, or otherwise attempt to mislead FWD's management, regulators or shareholders, or coerce, manipulate, mislead or fraudulently influence our independent auditors in the performance of their audit or review of FWD's financial statements.

Confidentiality and data privacy

A key to our success is protecting confidential information. As FWD employees, officers and directors, we are expected to maintain the confidentiality of information entrusted to us by the company and our customers, unless disclosure of such is authorised or legally mandated. By protecting such information and 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.

Additionally, we empower our customers and employees by providing transparent information about their data privacy rights including, the right to access, correct, delete and restrict the processing of their data. By prioritising these principles, we not only comply with our legal obligation but also build trust and integrity with our clients and stakeholders.

Confidential information

includes all non-public information that might be of use to competitors, or harmful to FWD and our customers, if disclosed. Confidential information:

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

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.

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.



More information can be found in the FWD Data Privacy Policy

Cybersecurity, use and protection of FWD systems and assets

All information entered into by employees using our systems or otherwise stored on our systems can be accessed and 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.

Company systems and assets should only be used for legitimate business purposes. Theft, carelessness and waste have an impact on the company's profitability.

We are all responsible for safeguarding the confidentiality, integrity and availability of the Company's information, systems and technology assets. This includes protecting Company, customer and third-party information from unauthorised access, misuse, loss or disclosure, and complying with applicable information security, cybersecurity and data protection requirements. Thus, all FWD employees, officers and directors should protect FWD's assets and ensure its efficient use. Any suspected incident of fraud or theft should be reported immediately.



Responsible use of Artificial Intelligence

We recognise the growing role of digital technologies, including artificial intelligence ("AI"), in how we conduct our business. We are committed to using technology responsibly, securely, and in a manner that is consistent with our values, applicable laws and regulations, and our duty to customers, colleagues, shareholders and other stakeholders.

When developing, procuring, deploying or using AI and other digital tools, we:



use AI in a responsible, ethical and transparent manner, ensuring it is designed and applied for legitimate business purposes and does not result in unfair bias, discrimination, or harm.



respect privacy, confidentiality and data protection requirements, and ensure that personal and sensitive information is handled in accordance with applicable laws and internal policies.



exercise appropriate human judgment and oversight when relying on AI-supported outputs, and not delegate decision-making accountability to automated systems.



comply with all relevant internal policies and standards governing AI, intellectual property, data governance, information security and technology risk management.



More information can be found in the FWD AI and Data Governance Policy and FWD Responsible AI Standard

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 Corporate Affairs 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 Corporate Affairs department to determine the proper next steps.

More information can be found in the FWD Communications Policy and FWD Inside Information Disclosure Policy

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 to our customers so that they are able to make informed decisions.

All agents working to sell our products must provide clear, adequate and not misleading, 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 things right?



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 must raise his concerns with Craig and their manager to address the issue. Craig must be transparent and honest during sales calls and use clear and layman language to describe all products and services.

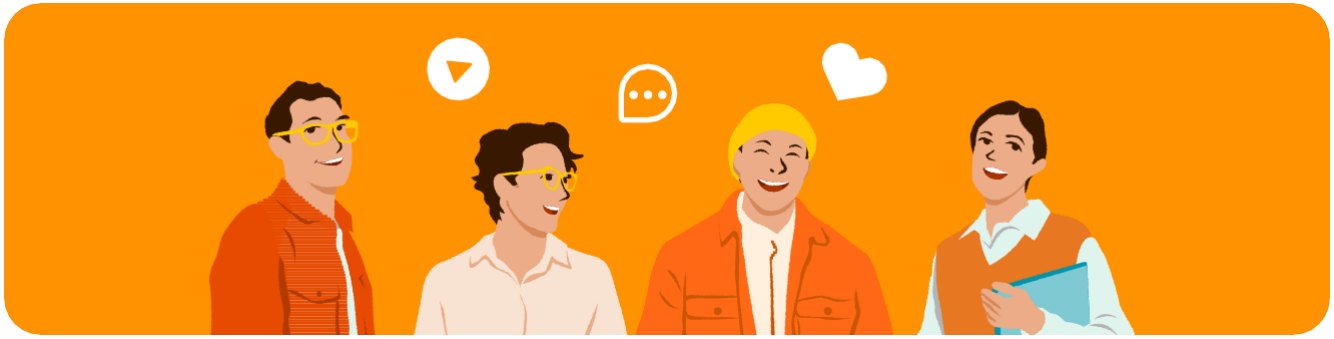
Craig is not living up to our Code by describing our offerings in a way that is difficult for customers to understand. When we market and sell our products, we need to simply and accurately describe what we are offering along with the potential risks involved.

When in doubt, both Bruce and Craig must immediately seek clarification on the appropriate way of presenting any products and services with their manager and/or agency leader.

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 Corporate Affairs 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 things right?



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



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, being open to new ideas and being able to speak up promptly and report any misconduct.

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 FWD Staff Handbook.

Diversity and inclusion



Consistent with our core as an international company that is diverse and inclusive, we expect professionalism and respect where we treat each other fairly and embrace our international culture and organisational values. All employees (including directors), contractors at all levels and distribution partners (including agents and brokers) are expected to promote a workplace where all people are valued.

At the same time, we do not tolerate any form of discrimination, harassment or bullying towards each other, our customers, business partners, agents or candidates interested in joining FWD.

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 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, intimidates or marginalises them. Any harassment, whether verbal, physical or environmental, is strictly prohibited by FWD and in some FWD markets, harassment on certain grounds may also be unlawful and subject to civil or criminal penalties.

The standards of a reasonable person are applied in determining whether harassment has occurred, i.e., any unwelcome behaviour in circumstances where a reasonable person would have anticipated that the harassed person would be offended, humiliated and/or intimidated. In determining whether a person carried out harassment, it is irrelevant whether or not that person is aware of the harassment, or whether or not it was intentional.

Bullying

Typical bullying conduct in the workplace includes repeatedly making derogatory or insulting remarks, showing aggressive behaviour towards others, deliberate defamation of character, intentional targeted isolation, serious or repeated verbal or physical conduct that could reasonably be considered threatening, intimidating or humiliating; and intentionally sabotaging or undermining another's work performance.

The presence of bullying behaviours directly and negatively impacts workplace safety and will not be tolerated at FWD.

Prevention

All FWD employees, directors, contractors at all levels and distribution partners (including agents and brokers) have the responsibility to behave in a manner which is non-discriminatory, appropriate, and which respects the rights and psychological safety of others. There is an expectation that to contribute towards an environment of trust and respect, we will all conduct ourselves in a manner which does not cause offence or is not likely to be perceived as offensive by others and if we see behaviour not aligned with this policy, we are obliged to follow-up.

FWD will take all reasonable steps to prevent discrimination, harassment and bullying.



In our commitment to workplace respect, inclusion, physical and psychological safety, FWD offers both informal and formal resolution options for people to raise discrimination, harassment or bullying concerns via Compliance, your manager, Human Resources or our Whistleblower process.

All reports made via the avenues above and any investigation process will be held confidentially. At FWD, we do not accept or allow retaliation against any person making a disclosure in good faith. We will not tolerate intimidation or victimisation of any employee who reports a concern or assists in the investigation about discrimination, harassment or bullying.

Am I doing the right things right?



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 FWD Anti-Harassment and Non-Discrimination Policy



5. Socially and environmentally responsible



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. It means we manage our business activities responsibly, reduce any potential negative impact on the environment and to give back to the community.

Environmental stewardship

We are committed to make a positive contribution towards protecting our environment and at the minimum, meet local and international environmental regulations. We endeavour to take into consideration the environmental impact of our operations and investments, including the use and procurement of environmentally preferred products and services, where practicable.



Social responsibility



At FWD, we believe everyone matters and supporting the communities around us is one of our core values.

In order to positively contribute to our communities, we should stay aware of relevant issues affecting people and society. Our company may organise volunteering activities and charity drives to fundraise for important issues. We encourage you to join these events and activities.

We may support or engage with non-government organisations (NGOs) 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.

More information can be found in the FWD Community Care Guidelines

Human rights

We are committed to the promotion of human rights. This means that:

- We promote diversity and inclusion in our workplace.
- We do not tolerate discrimination harassment of any kind We provide a safe and healthy work environment.
- We provide a safe and healthy work environment.
- We respect and protect our employees' labour rights, such as entitlements to wages, leave and other benefits, work hours arrangement and continuing training and career development.
- We prohibit the use of child labour and forced labour.
- We respect the freedom of our employees to express their personal opinions subject to the need to protect our reputation and to maintain an inclusive working-environment.
- We provide an effective mechanism for reporting grievances and whistleblowing without fear of retaliation.
- We protect data privacy of our customers and employees.
- We do not work with customers, agents or business partners that are known human rights violators.
- We recognise our employees' right 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.



More information can be found in the FWD Human Rights Guidelines

No child nor forced labour

We do not tolerate the use of child or forced labour, and/or exploitation of children in any of our business operations and we strictly adhere to our principles that an employee or contractor should have the right to leave the work premises after completing the standard workday and to terminate employment after giving reasonable notice.

We support, follow and abide by labour laws and regulations where we conduct business, including those that address child labour and forced labour. We uphold the elimination of all forms of child labour and forced labour and prohibit the use of under-age and compulsory labour.



Remember to always Do the Right Things Right!

Doing the right things right is not a slogan—it is a daily commitment. It means pausing to consider not only what we do, but how and why we do it. It requires us to act with integrity even when no one is watching, to speak up when something does not feel right, and to seek guidance when faced with uncertainty.

Each of us plays a role in protecting our culture, our reputation, and the trust placed in us by our customers, business partners, regulators, and one another. When in doubt, ask yourself: Is this lawful? Is it ethical? Is it consistent with our values? Would I be comfortable explaining this decision? If the answer is no—or if you are unsure—pause and reach out for support.

If you have questions about compliance or are uncertain about the right course of action, the Compliance team is here to help. Seeking advice is always the right thing to do and helps ensure that we act responsibly, transparently, and with confidence.

By holding ourselves and each other to these standards, we strengthen FWD and ensure that we continue to do the right things right—today and in the future.





Celebrate living®

fwd.com