

WHISTLEBLOWING POLICY

1 PURPOSE

Sun Life Information Services Ireland Limited (**Sun Life**) is committed to conducting its business with honesty and integrity and in a transparent, accountable and ethical manner. Sun Life expects all workers to maintain these same high standards. An important aspect of accountability and transparency is to put in place an effective mechanism to enable workers to voice concerns in a responsible and effective manner.

The primary aims of this Policy are to:

- (a) encourage workers to report suspected wrongdoing, which has come to their attention in a work-related context, as soon as possible, in the knowledge that their concerns will be taken seriously and followed up on as appropriate, and that their statutory rights will be respected;
- (b) provide workers with guidance as to how to raise those concerns through internal reporting channels; and
- (c) reassure workers that they are entitled to raise genuine concerns and disclose information without fear of reprisal even if their concerns turn out to be mistaken.

2 SCOPE

This Policy applies to all Sun Life workers including all permanent, part-time and fixed-term employees at all levels, directors, consultants, contractors, agency workers, trainees, apprentices, shareholders, members of administrative, management or supervisory bodies (including non-executive members), volunteers, job applicants (where information on a relevant wrongdoing is acquired during the recruitment process or during pre-contractual negotiations).

3 WHAT IS WHISTLEBLOWING?

In accordance with the Protected Disclosures Act 2014, as amended by the Protected Disclosures (Amendment) Act 2022, (the "**Act**"), whistleblowing, also referred to as the making of a "Protected Disclosure", is the disclosure of relevant information by a worker in a manner prescribed by the Act. Information is "relevant information" if:

- a) in the reasonable belief of the worker, it tends to show one or more relevant wrongdoings; and
- b) it came to the attention of the worker in a work-related context (which includes current or past work activities).

A relevant wrongdoing includes where:

- (a) an offence has been, is being or is likely to be committed;
- (b) a person has failed, is failing or is likely to fail to comply with any legal obligation (other than one arising under the worker's contract of employment or other contract where the worker personally performs any work or services);
- (c) a miscarriage of justice has occurred, is occurring or is likely to occur;
- (d) the health or safety of any individual has been, is being or is likely to be endangered;
- (e) the environment has been, is being or is likely to be damaged;

- (f) a breach has occurred, is occurring or is likely to occur (either by act or omission) that (i) is unlawful and either falls within the scope of European Union law in areas specified in the Act as detailed below or affects the financial interests of the European Union or relates to the internal market; or (ii) defeats the object or purpose of the rules in the European Union acts and areas specified in (i);

Areas specified in the Act: (i) public procurement; (ii) financial services, products and markets, and prevention of money laundering and terrorist financing; (iii) product safety and compliance; (iv) transport safety; (v) protection of the environment; (vi) radiation protection and nuclear safety; (vii) food and feed safety and animal health and welfare; (viii) public health; (ix) consumer protection; (x) protection of privacy and personal data, and security of network and information systems;

- (g) information tending to show any matter falling within any of the above has been, is being or is likely to be concealed or destroyed or an attempt has been, is being or is likely to be made to conceal or destroy such information.

If a worker has any concerns related to a relevant wrongdoing affecting any of Sun Life's activities, they are encouraged to report it in accordance with this Policy.

Is an interpersonal grievance a relevant wrongdoing?

The following do not constitute relevant wrongdoings under the Act and therefore cannot be the subject of Protected Disclosures under this Policy: any matter concerning interpersonal grievances exclusively affecting the worker raising the concern that are either (i) grievances about interpersonal conflicts between the worker raising the concern and another worker or (ii) a matter concerning a complaint by a worker to, or about, the Sun Life which concerns the worker exclusively.

Depending on the circumstances, such matters may be dealt with through our Grievance Procedure or any other applicable procedures.

If a worker raises a concern under this Policy that Sun Life reasonably believes should be addressed under a different company policy, we may deal with the matter under the procedure we deem appropriate.

If you are uncertain as to whether something is within the scope of this Policy, you should seek advice from the Ireland HR Lead.

Motivation and malicious intent / knowingly reporting false information

The motivation for raising a concern is irrelevant when determining whether or not a disclosure is a Protected Disclosure protected by the Act. Where a worker raises a concern or makes a disclosure in accordance with this Policy based on a reasonably held belief, but the disclosure of alleged wrongdoing is ultimately not substantiated, no action will be taken against the worker who made the disclosure and the worker will be protected against any penalisation.

However, it is important to note that if an unfounded allegation is found to have been made with malicious intent, or that a worker knowingly reported false information, and not pursuant to a reasonably held belief, then disciplinary action may be taken. Workers should be aware that it is a criminal offence to report any information under this Policy which they know to be false.

In addition, workers should also be aware that disclosure of a wrongdoing does not necessarily confer any protection or immunity on a worker in relation to any involvement they may have had in that wrongdoing.

4 **PROTECTION AND SUPPORT FOR WHISTLEBLOWERS**

It is understandable that workers are sometimes worried about possible repercussions of making a report under this Policy. We aim to encourage openness and will support workers who raise concerns in accordance with this Policy, even if they turn out to be mistaken.

A worker who raises a concern under this Policy will not be subject to any detrimental treatment (known as penalisation under the Act) or threat of such as a result of raising a concern under this Policy. The Act provides a detailed definition of penalisation, but by way of example such detrimental treatment may include dismissal, disciplinary action, threats or other unfavourable treatment connected with raising a concern.

If you believe that you have suffered any such treatment as a result of raising a concern under this Policy, you are encouraged to bring this to the attention of the Ireland HR Lead for consideration and, where considered appropriate, action by Sun Life. In certain cases, if it is not appropriate for the Ireland HR Lead to handle this issue, it will be escalated to another suitable person within the business.

Sun Life employees must not threaten, retaliate against or otherwise penalise individuals who raise concerns under this Policy in any way. Anyone involved in such conduct will be subject to disciplinary action up to and including dismissal.

5 **CONFIDENTIALITY**

We hope that workers will feel able to raise concerns with us openly under this Policy. We are committed to protecting the identity of the worker raising a concern where possible and assure workers that the focus of any follow up by Sun Life will be on the relevant wrongdoing rather than the worker making the disclosure.

If a worker raises a concern under this Policy which constitutes a Protected Disclosure, the person with whom the concern was raised or any person to whom it is transmitted will ordinarily require the worker's explicit consent to disclose the worker's identity to any other person.

However, this requirement for explicit consent does not prevent disclosure of the reporting worker's identity (or anything from which it can be deduced, directly or indirectly) to other persons where the recipient of the report or a person to whom it is transmitted reasonably considers that this may be necessary for the purposes of the receipt or transmission of, or to follow up on, the report (i.e. on a need-to-know basis).

In addition to the grounds outlined in the paragraph above, there are also other circumstances in which it will not be necessary to obtain the explicit consent of the worker to the disclosure of their identity (or anything from which it can be deduced, directly or indirectly). This applies where:

- (a) disclosure is a necessary and proportionate obligation imposed by Irish or EU law in the context of investigations or judicial proceedings, including with a view to safeguarding the rights of defence of other parties referred to in the worker's Protected Disclosure;
- (b) the person to whom the report was made or transmitted:
 - (i) shows that they took all reasonable steps to avoid disclosing the identity of the reporting person or any information from which their identity may be directly or indirectly deduced; or
 - (ii) reasonably believes that disclosing the identity of the reporting person or any information from which their identity may be directly or indirectly deduced is necessary for the prevention of serious risk to the security of the State, public health, public safety or the environment;
- (c) the disclosure is otherwise required by law.

Where the worker's identity (or any information from which their identity may be directly or indirectly deduced) is disclosed without their explicit consent due to the circumstances in (a), (b)(ii) or (c) above, the worker will be notified in writing before their identity or the information concerned is disclosed, unless this notification would jeopardise:

- (a) the effective investigation of the relevant wrongdoing concerned;
- (b) the prevention of serious risk to the security of the State, public health, public safety or the environment; or
- (c) the prevention of crime or the prosecution of a criminal offence.

If a worker's identity has been disclosed and the worker does not believe this disclosure has been made in compliance with this section 5, the worker may raise a complaint with the Ireland HR Lead. In certain cases, if it is not appropriate for the Ireland HR Lead to handle this issue, it will be escalated to another suitable person within the business.

No steps should be taken by any Sun Life employee to identify a worker who makes a disclosure under this Policy. Any unauthorised action in this regard will be taken seriously by Sun Life and may result in the initiation of a disciplinary process under Sun Life's Disciplinary Policy against the employee concerned.

6 ANONYMOUS REPORTING

Sun Life is not obliged under the Act to accept and follow-up on anonymous reports and, due to the practical difficulties that can arise in following up on anonymous reports, does not encourage workers to raise concerns under this Policy anonymously. We encourage workers to report their concerns under this Policy on a non-anonymous basis, on the understanding they will benefit from confidentiality as outlined in section 5 above. This will make it easier for us to assess the concern raised and take appropriate action including conducting an effective investigation if considered necessary.

However, we recognise that reports made under this Policy may involve highly confidential and sensitive matters and that workers may prefer to make an anonymous report. Therefore, though not legally obliged to do so, Sun Life is willing to accept anonymous reports, but only where:

- i. workers elect to make their report under this Policy via our centralised Ethics Hotline rather than the local, Irish entity-specific hotline (see further details on these channels in section 7 below); and
- ii. the worker confirms expressly in their report that they intend to make a protected disclosure under this Policy. This is for purely practical reasons, given that the fact of the anonymity itself can often make it difficult, if not impossible, to identify reports under this Policy / to segregate them from other types of reports received via our centralised Ethics Hotline.

Where it is considered appropriate in the circumstances, Sun Life may decide, on a case-by-case basis to follow up on an anonymous report. In this regard, it is more likely to be appropriate to do so where the report relates to matters of particularly serious concern, is sufficiently detailed to enable effective follow up to be conducted and the matters of concern raised can be independently verified. Therefore, if reporting anonymously, we encourage workers to provide as much information as possible in relation to the relevant wrongdoing concerned.

Workers who wish to make a report anonymously should note that important elements of these procedures (e.g. providing feedback to the worker who made the report as described below) may be difficult or impossible to apply unless the worker is prepared to identify themselves. It is a condition of Sun Life accepting an anonymous report under this Policy that it will be a matter for our sole discretion as to which elements of this Policy it is possible to apply.

7 INTERNAL REPORTING CHANNELS AND PROCEDURES

7.1 How to make a Protected Disclosure?

Workers who wish to make a report under this Policy are encouraged to do so via the Sun Life group's centralised Ethics Hotline. The Ethics Hotline is managed by an external service provider (ClearView Connects™) and allows reports to be made, including anonymously:

- In writing (either online at www.clearviewconnects.com or by post to P .O. Box 11017, Toronto, Ontario, M1E 1N0, Canada); or
- Orally (by calling the Ireland-specific toll-free number 1800903 368 or via Skype Audio). This is not a recorded line. However, a transcription / minute of the report will be read back to the worker making the report to confirm that it is correct. The worker will subsequently be offered the opportunity to check, rectify and agree the record of their report by signing the transcription / minute.

Further details of the Ethics Hotline can be found here: <https://www.sunlife.com/en/about-us/code-of-conduct-and-ethics-hotline/>

As indicated above, we encourage all workers reporting under the policy to do so via the Sun Life Group's central Ethics Hotline. However, in addition to our Ethics Hotline we now have established a local entity reporting channel as required by the Act. Workers who prefer to use this local reporting channel, may make a report in writing by sending an email to speakup.ireland@sunlife.com. As indicated above, we do not accept anonymous reports via this channel. Workers can use the form at Appendix 1 of this Policy to raise their concern in writing.

Irrespective of which method of reporting is chosen by a worker, these reporting channels are designed, established and operated in a secure manner that ensures the confidentiality of the worker's identity and the identity of any third party mentioned in the report made and the prevention of access by non-authorised individuals.

Once a worker raises a concern under this Policy, they will receive an acknowledgement in writing within 7 days of its receipt.

Workers should be aware that they are not required to, and should not, investigate concerns they have prior to reporting them in accordance with this Policy. All they need do is disclose the information that they have based on a reasonable belief that it discloses a relevant wrongdoing. The responsibility for investigating and addressing any wrongdoings lies with us.

7.2 What happens next?

Where a worker makes a Protected Disclosure under this Policy, an impartial person or persons will be designated who is / are competent to follow up on the concerns raised (the **Designated Person**):

- Where a worker opts to use the Ethics Hotline as recommended above, the Designated Person may be an employee within a relevant function in a group company and / or the Director of Finance and Operational Compliance and the Ireland HR Lead or other appropriate Sun Life employee (acting in any combination, as appropriate).
- Where a worker opts to use Sun Life's Irish-specific local channel, the Designated Person will generally be the Director of Finance and Operational Compliance and/or the Ireland HR Lead (acting singly or jointly, as appropriate). However, we may appoint an alternative Designated Person in the event that we consider this appropriate for any reason.

The Designated Person will maintain communication with the worker who raised the concern and, where necessary, request further information from, and provide feedback to, that worker.

A worker who has made a report under this Policy is required to conduct themselves professionally and to continue to carry out their duties as normal.

The recipient of the report and/or the Designated Person(s) may need to notify members of senior management of the fact and substance of a concern reported under this Policy, bearing in mind their confidentiality obligations under this Policy.

The Designated Person will conduct diligent follow-up, including the following:

7.2.1 **Initial Assessment**

The carrying out of an initial assessment as to whether there is *prima facie* evidence that a relevant wrongdoing may have occurred;

(a) Where there is no *prima facie* evidence

If, having carried out an initial assessment, the Designated Person decides that there is no *prima facie* (i.e. apparent) evidence that a relevant wrongdoing may have occurred, the Designated Person will notify the worker, in writing, as soon as practicable of that conclusion, the reasons for it and the fact no further steps will be taken under this Policy. However, the Designated Person may refer the matter to be dealt with under another applicable company procedure.

(b) Where there is *prima facie* evidence

If, having carried out an initial assessment, the Designated Person decides that there is *prima facie* evidence that a relevant wrongdoing may have occurred, the Designated Person will take appropriate action to address the relevant wrongdoing, having regard to the nature and seriousness of the matter concerned. This may involve, among other things, resolving the matter by agreed action or it may require the establishment of an investigation as outlined below.

7.2.2 **Feedback**

The Designated Person will provide feedback to the worker who raised the concern within a reasonable period, being not more than three months from the date the acknowledgement of receipt of the Protected Disclosure was sent to the worker. Feedback is information on the action envisaged or taken as follow-up and on the reasons for such follow-up. The extent of the feedback that can be provided will be determined by the circumstances and what feedback can feasibly and appropriately be provided.

Where requested in writing, the Designated Person will provide the worker who has raised the concern with further feedback at intervals of no more than three months until such time as the procedure relating to the Protected Disclosure concerned is closed.

Workers should be aware there are limits on the extent to which feedback can be provided and in relation to the detail that can be shared when feedback is being provided. Any feedback that is shared is shared on a confidential basis and should not be disclosed further by the recipient of the feedback, other than on duly justified grounds (e.g. to their legal advisor, trade union representative, etc.). Workers should be aware that, for data protection and privacy related reasons, it is very unlikely they will be made aware if any disciplinary action is to be taken against another worker on foot of an investigation triggered by their protected disclosure.

7.3 **Investigation**

If arising out of the initial assessment, a decision is made to conduct an investigation into the concerns raised, it will be conducted fairly and objectively and with due regard to the rights of the participants in the investigation. The form and scope of the investigation will depend on the subject matter of the Protected Disclosure. In the course of the investigation, it might be necessary for the investigator(s) to review relevant

documentation and conduct interviews with relevant parties. In certain cases, it might be considered necessary to appoint an external investigator(s) to conduct the investigation.

The appointed investigator(s) will advise those interviewed as part of any investigation of the importance of confidentiality, instructing them to maintain confidentiality and (amongst other matters) advising them that any penalisation against them for participating in the investigation is strictly prohibited and that any such action may lead to disciplinary proceedings.

8 EXTERNAL REPORTING CHANNELS

Workers are not obliged to report relevant wrongdoings to Sun Life and may, in certain circumstances, instead make reports externally. While we hope that workers will feel comfortable raising their concerns with us directly, workers who consider it necessary to raise concerns externally can do so via external reporting channels. However, workers should be aware that different, more stringent standards apply in order to qualify for protection under the Act where concerns are raised externally with a prescribed person and/or the Office of the Protected Disclosures Commissioner (the "**Commissioner**").

8.1 *Protected Disclosure to a prescribed person or the Commissioner*

Where a worker raises a concern externally with a prescribed person or the Commissioner, in order for it to constitute a Protected Disclosure the worker must reasonably believe:

- (a) In the case of disclosure made to a prescribed person, that the relevant wrongdoing is within the remit of the prescribed person; and
- (b) In all cases, that the information the worker discloses and any allegation in it are substantially true. This is a higher standard than is required for disclosure to Sun Life.

8.2 *Making a disclosure to a prescribed person*

Prescribed persons are persons, typically within public / State bodies, who exercise public, regulatory and law-enforcement functions and who are designated by law to receive protected disclosures – for example, certain office holders within Corporate Enforcement Authority, the Data Protection Commission, the Workplace Relations Commission, the Central Bank, etc.

The Department of Public Expenditure and Reform's [website](#) contains a list of prescribed persons and/or bodies with whom concerns can be raised externally and a description of the matters/areas the worker can report to them.

8.3 *Making a disclosure to the Commissioner*

Details of how to raise a concern with the Commissioner will be available on the Commissioner's [website](#).

9 RECORD KEEPING

We will keep a record of all reports made under this Policy and any follow up conducted, findings and/or outcomes and/or any recommendations and/or next steps. These records will be kept for as long as is considered necessary and proportionate in accordance with all applicable law.

10 COMMUNICATION, MONITORING AND REVIEW

This Policy will be communicated as appropriate and will be subject to regular monitoring and review.

This Policy is non-contractual and Sun Life retains discretion to make any changes to this Policy that it deems appropriate from time to time.

Appendix 1

WHISTLEBLOWING REPORT

Date:

Is your concern intended to be a Protected Disclosure (as defined in this Policy): Yes [] / No []

Do you believe that the concern relates exclusively to an interpersonal grievance affecting you? Yes [] / No []

Name (in full):

Job title:

Place of work:

Work phone number:

Work email address:

Date the alleged Relevant Wrongdoing (as defined in this policy) occurred/date you became aware of its occurrence:

Is the alleged Relevant Wrongdoing ongoing: Yes [] / No []

Has the alleged Relevant Wrongdoing already been disclosed? If so, please provide details of when it was disclosed, to whom it was disclosed and the action taken as a result (if any):

Please describe the alleged Relevant Wrongdoing in detail and furnish any relevant supporting documentation:

Please provide details of all individuals involved in the alleged Relevant Wrongdoing and, if known, identify them by reference to their role, responsibilities and/or relationship with Sun Life:

Please provide any additional information you believe to be relevant:

Signed (where you do not wish to remain anonymous)

Name:

Date: