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Our Code of Conduct



Introduction

This Code of Conduct is an important document and reflects our commitment to conducting our business affairs in an ethical and consistent manner. This cannot be achieved unless every employee accepts responsibility for upholding the highest standards of honesty and integrity at all times and in all situations. Any activity or action that calls into question the reputation of FPG Insurance must be totally avoided at all times.

Code of Conduct

This Code of Conduct provides essential guidance to enable you to understand your responsibilities, including your obligation to comply with the law and to advise management of anything that is not in compliant with the law or this Code of Conduct.

“ No one has the authority to require anyone to act contrary to this Code of Conduct ”

This Code of Conduct applies to all persons who represent FPG Insurance which includes full-time and part-time employees, persons engaged as contractors and other temporary personnel. It applies while working on our premises, at offsite locations where our business is being conducted, at Company-sponsored business and social events or at any other place where you represent the Company.

If you are employed by or represent FPG Insurance in any capacity, you are responsible for ensuring you understand this Code of Conduct. If there is anything written in the Code of Conduct that you do not understand you must seek guidance from your Manager. Your failure to seek guidance on any aspect of the Code of Conduct that is unclear to you cannot be used as an excuse to justify any accidental breach of the Code of Conduct.

You must at all times conduct FPG Insurance business in accordance with applicable laws and regulations, and Company policies, including this Code of Conduct. You must take breaches of the law and/or this Code of Conduct seriously and immediately report any breach. You must avoid any situation that might compromise the integrity of FPG Insurance when pursuing business goals.

Managers set an example for other employees and are often responsible for directing the actions of others. Every manager is expected to take the necessary actions to ensure compliance with this Code of Conduct, to provide guidance and assist employees in resolving questions, and to encourage employees to express any concerns regarding compliance with this Code of Conduct.

At times, you may face an issue you have difficulty resolving. If faced with such an issue, ask yourself these questions:

- **Is it ethical and legal?**
- **Is it consistent with our policies and this Code of Conduct?**
- **Is it consistent with FPG's mission and values?**
- **Can I explain this to my family and friends?**
- **How would I feel if my employment was terminated?**

Compliance with Laws

This Code of Conduct reinforces that we are committed to following the law to protect FPG Insurance and our employees.

“ Always ask questions if you are unsure about complying with the law and any other legal requirements ”



We are committed to full compliance with all applicable laws and regulations, both in letter and spirit. Numerous laws and regulations define and establish obligations with which FPG Insurance, its full-time and part-time employees, persons engaged as contractors and other temporary personnel must comply. Violations of laws or regulations may lead to serious consequences for FPG in addition to damaging the reputation of FPG.

We follow all laws in every country that apply to our business. All employees and personnel who represent FPG, must have a working knowledge of the laws applicable to their area of responsibility and must ask their manager if they are unsure of what laws apply or have any questions.

Examples of Laws that may apply to you could include:

- **Corruption**
- **Privacy and Data Protection**
- **Competition**
- **Employment**
- **Inside Trading**

Violations of laws or regulations may lead to your own individual criminal or civil liability. You could also be subjected to disciplinary action or termination of your employment agreement. You may also subject FPG Insurance to civil or criminal liability.

Conflict of Interest

There may be a situation that results in a conflict between your interests and those of FPG Insurance. It is important for you to understand possible situations where such a conflict might arise and how you must deal with it.

You are expected to avoid situations that may conflict with the interests of FPG Insurance. A conflict of interest can occur when your personal interests interfere in any way, or even appear to interfere, with the interests of FPG Insurance.

In other words, you must not take advantage of your employment with FPG Insurance for personal gain or take any actions or have any interests that make it difficult for you to perform your work objectively and effectively, or that interfere with your judgment in the course of your work.

If you think you may have a conflict, actual or potential, you must always discuss the details with your manager. Remember to always report a potential conflict of interest to your manager or HR and secure any necessary approvals. We will work together with you to address the conflict and your concerns.

“ You have a responsibility to avoid situations where your personal interests interfere with the interests of FPG Insurance ”

Examples of Potential Conflicts of Interest:

- Holding an investment (directly or indirectly) in a competitor, supplier, customer, agent, broker, client or other company that does business with FPG Insurance that would appear to impair your judgement of what is in FPG's best interest.
- Being employed, providing services to or representing a competitor, supplier, customer, agent, broker, client or other company that does or has the potential to do business with FPG.
- Taking advantage of any business opportunity and competing with FPG Insurance by providing services, purchasing or selling any property or diverting from FPG Insurance any business opportunity in which FPG Insurance has or is likely to have an interest.
- Using FPG Insurance funds, facilities, equipment, know how or personnel for any other business or personal endeavours.
- Accepting (directly or indirectly) anything of value from a competitor, supplier, customer, agent, broker, client or other company – particularly where the purpose is (or could appear to be) to improperly influence a business decision or relationship.
- Conducting business with any competitor, supplier, customer, agent, broker, client or other company that is owned or controlled by a relative, family members or close friend. Hiring a relative, family member or close friend would also give rise to a conflict of interest.



Gifts, Entertainment & Other Benefits

In order to maintain ethical standards and to meet our obligations relating to anti-corruption laws, FPG Insurance must ensure that gifts, entertainment and other benefits are not given or received to inappropriately influence our interactions with third parties.

“Gifts, entertainment or other benefits provided to business partners, agents, consultants or other third parties can be considered illegal ”



You must never give, request or accept anything of value which might influence (or even appear to influence) the business relationship between you and another party.

FPG recognizes that giving and receiving gifts and entertainment are often considered common business or cultural practices, intended to strengthen and build long term relationships. Accepting or giving common courtesies (such as an occasional and inexpensive business meal or non-monetary gifts of a nominal value) to or from customers, clients, suppliers, sub-contractors and other parties you do business with, is permitted in certain situations. However all gifts and entertainment must be:

- Reasonable in value
- Infrequent in nature
- Transparent and open
- Not given to influence or obtain an unfair advantage
- Respectful and customary

Money or cash equivalents (e.g. gift cards, certificates and coupons) should never be given or received.

Corruption is illegal and subject to criminal penalties in most countries. You may not give any bribes, kickbacks or other benefits to any person or company to attract or retain business.

These guidelines apply to both commercial, government and state-owned enterprise relationships. Relationships with government always require special consideration and care, so you must ensure that you understand your responsibilities.

Fees, commissions and other amounts paid to business partners, agents, consultants or other third parties, must never be used with the intent to circumvent these guidelines.

Contact your manager if you have any questions or concerns about a gift, entertainment or other benefit, or this guideline.

Government Relationships

It is important to ensure our interactions with governments are open, transparent and do not violate anti-corruption laws. This Code outlines our approach to dealing with government officials and employees.

“Always exercise the highest ethical, moral and legal standards when dealing with government employees, customers and officials”

Our employees may come into contact with various government agencies and state-owned enterprises. We value our excellent relationships with government and will work fairly and honestly with them.

Dealing with government officials always requires special consideration and care, particularly when you are giving or receiving gifts and entertainment. Therefore, you are required to understand what you can or cannot do under the Gifts, Entertainment & Other Benefits section of this Code of Conduct.

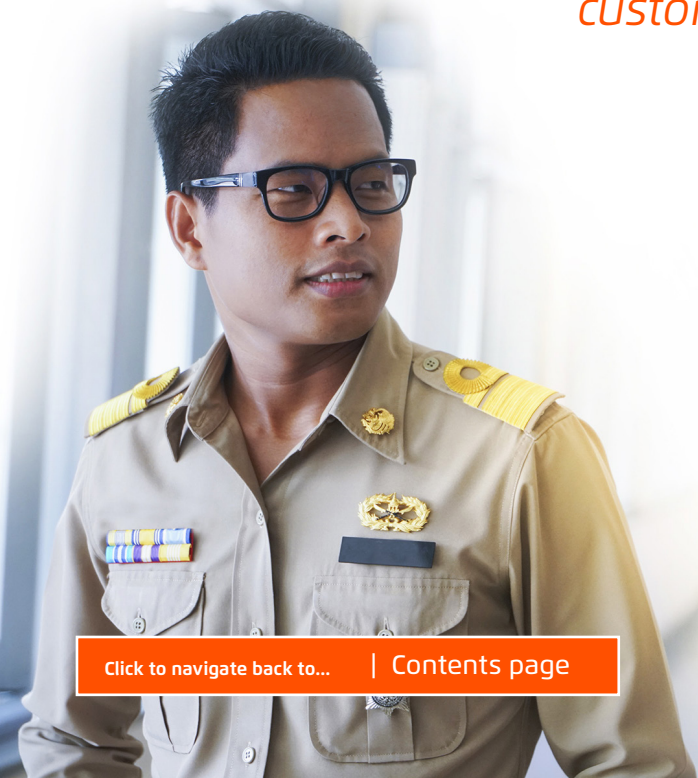
When dealing with government officials you must never make any payment or provide any other thing of value (including gifts, entertainment, or promises or offers to provide anything of value) directly or indirectly to a government official for the purpose of obtaining or retaining business or securing an improper advantage.

You must also never make any facilitation payments to government officials or employees to expedite routine government actions they are already bound to perform, e.g. processing papers.

Examples of Government Officials include:

- **Any official or employee of a government institution (e.g. car fleet officer, property manager etc.)**
- **Any official or employee of a government agency or regulatory authority (e.g. insurance regulatory authority, tax department, etc.)**
- **Any political candidate or member of a political party**
- **Any government official acting in that capacity for a commercial enterprise.**

It is Company policy to comply with all applicable laws and regulations when dealing with government officials and to adhere to the highest ethical, moral and legal standards. You must never improperly record any payments to government agencies. You are also prohibited from using third parties, consultants or agents to accomplish what FPG cannot do legally or properly.



Political and Charitable Contributions

To ensure we do not make political or charitable contributions to gain improper advantage, this Code of Conduct provides guidance on how these types of contributions should be made.

FPG Insurance is committed to making a positive contribution in the communities where we do business. It can be very rewarding to participate in the civic life of your community, and we encourage you to do so. As part of that commitment, we will consider requests for donations to show our support for worthy organizations and activities in those communities. We do not, however, support political candidates or parties, religious or fraternal organisations.

No Company funds or services can be paid or provided to any political party or any candidate for public office without pre-approval. Although employees are permitted to make personal contributions, the Company will not reimburse you for your own contributions.

All political and charitable donations must be pre-approved. You must never allow FPG funds, property, facilities, or employee time to be used for, or to be contributed to political campaigns or political practices under any circumstances. You should always be careful when you are asked to make a political or charitable contribution, particularly when it is part of a business transaction.

“ Always ensure all and any contributions to our community are given in an open and transparent manner ”



Business Conduct

There are serious consequences for breaching competition laws, as well as damage to our business reputation when we compete for business unfairly. It is essential that everyone understands how to behave when conducting business on behalf of FPG Insurance.

Competition laws prohibit business practices that interfere with free and open competition which can involve competitors, business partners, and customers. FPG is committed to strictly complying with these laws. We will always lawfully compete in the marketplace and our commitment extends to the rights of our competitors, business partners and customers.

These laws are complex and vary considerably from country to country. If you have any questions, you should always ask your manager. It is essential that you remember the following:

- **You must never share information with a competitor**
- **You must never agree to divide up markets, customer groups or locations with a competitor**
- **You must never restrict a customer from buying one product on the condition they must buy another. They must have the right to buy them separately**
- **Never mislead or lie to customers**
- **Never gather competitive information in an unethical or illegal manner**

“ We must compete on the merits of our services and not engage in any form of unfair competition ”

Customers, Business Partners & Other Key Relationships

It is important that all employees understand the importance of acting appropriately in our relationships with customers, business partners and other stakeholders.

“ Always act in a manner that builds a relationship based on trust and integrity ”

If your job places you in contact with customers (or potential customers), business partners, e.g. Brokers or Agents or other stakeholders, it is critical for you to remember that you represent FPG and its values. Act in a manner that always creates value and helps to build relationships based on trust. We have provided insurance services for over 50 years and have built up significant goodwill over that time. This is one of our most important assets and employees must act to preserve and enhance our reputation.

Customers (or potential customers), business partners, e.g. Brokers or Agents or other stakeholders are critical to our future. To maintain an environment where they are prepared to support FPG, they must be confident that they will be treated lawfully and in an ethical manner.

Always remember to treat all parties fairly and with respect with a view to building trust in all relationships. You must never attempt to influence customers, business partners or other stakeholders in any way with corrupt intentions. The protection of confidential information of our customers, business partners and other stakeholders is of the highest importance and you have a personal responsibility to ensure personal data is secure at all times.



A Positive Workplace

This Code sets out how we maintain our moral obligation to treat people with dignity. By creating a positive workplace, we will be able to hire and retain good employees and maintain a productive workforce.

“ Each of us must be treated with respect and dignity in the workplace ”



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We are all required to create and maintain a working environment that reflects the Company's Employee Values. All employees must through their words and actions treat each other with honesty, openness, trust and respect. All employees are expected to exercise the highest levels of integrity.

Discrimination & Harassment

Everyone has a responsibility to ensure unlawful discrimination and harassment, including sexual harassment is not tolerated in our workplace and is excluded from all employment-related decisions, such as:

- Recruitment
- Training
- Hiring
- Disciplining
- Compensation
- Promotion

If you have any questions about discrimination or harassment, please contact your Manager or Human Resources.

Workplace Safety

We are committed to providing a safe and clean environment so that everyone can work in an efficient and productive manner. Employee safety is a top priority and we will always work diligently to protect the health and safety of our employees by ensuring effective training and protective measures are in place. Everybody is required to enforce and support our safety policies.

Always remember to never discriminate on the basis of race, religion, gender, sexual orientation, age, national origin, disability or marital status. You must never use drugs or consume alcohol in the workplace or engage in gambling. You must always protect peoples' privacy.

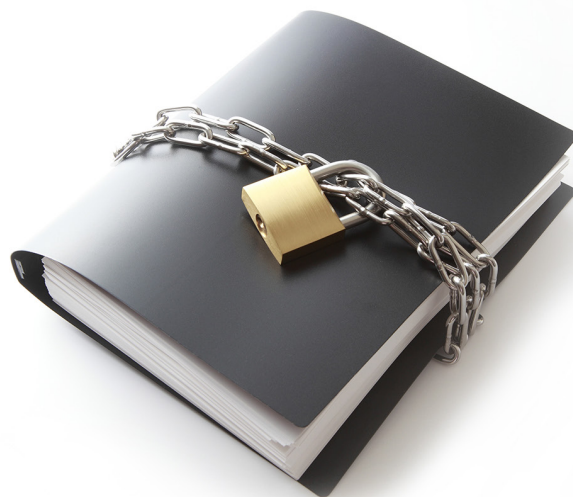
Protecting Confidential Information

Confidential information is vital to our business relationships. This Code provides guidance on what constitutes confidential information and how to protect it.

What is Confidential Information?

Confidential information is information about FPG Insurance that is not generally known or cannot be reasonably acquired by other people. Such information often holds commercial value for FPG and provides us with a business advantage over our competitors.

“ Protecting third party information is just as important as protecting internal FPG Insurance information ”



Examples of Confidential Information:

- Customer Information
- Broker Information
- Premium Pricing
- Claims Data
- Information concerning external parties who provide services to FPG
- Strategies
- Budgets
- Business Processes & Information Systems
- Intellectual Property
- Trade Secrets & Service Capabilities
- Policies & Procedures
- Credit Terms & Payment/Collections Methods
- Marketing Information
- Contractual Terms & Other Sensitive Commercial Information
- Employee Salaries & Compensation

All employees are responsible for making sure adequate safeguards are in place to prevent the unauthorised disclosure or loss of confidential information. We must protect confidential information we receive from customers, business partners, agents, brokers and other third parties in the same way as we protect our information. Such information is sensitive and is not for general distribution.

Contact your Manager or Human Resources concerning any possible or actual breach of confidential information, or if you have any questions about handling confidential information.

Always remember to only disclose confidential information to fellow employees who need to know such information. Never try to acquire confidential information from others. Do not encourage employees of a competitor, customer, business partner, agent or broker to disclose confidential information. If you hire a former employee from a competitor, customer, agent or broker or work with someone who once worked for one of these parties, do not ask this person to improperly disclose confidential information. Always refuse unsolicited third party confidential information.

Protecting Personal Information

Our IT and other Company Policies detail our responsibilities for the protection of personal information gathered from our customers, business partners, agents, brokers and employees. The highest standards of integrity must be applied when handling Personal Information.

FPG and our business partners are all accountable for protecting personal information and for processing that information only within the boundaries of applicable laws and FPG Insurance policies and procedures.



“ Always protect Personal Information as through your own information were being used ”

What is Personal Information?

Personal Information (sometimes referred to as personally identifiable information) is information that is about, or can be related to, an identifiable individual. Some examples of personal information:

- Name
- Gender
- Date of birth
- Telephone number
- Residential address
- Email address
- National Identification number
- Passport number
- Medical history
- Policy and Claim history
- Credit card details
- Bank account details
- Marital status
- Racial or ethnic origin
- Religious beliefs
- Offences or criminal convictions
- Fingerprints
- Physical characteristics

We must make sure we comply with local laws whenever we collect, store, use, disclose and destroy personal information.

Always Remember to keep personal information strictly confidential and only use or disclose it in accordance with applicable laws and regulations and, when necessary, only after giving notice or obtaining the individual's consent. Personal information should not be disclosed to third parties except where you have obtained the individual's permission or there is a legal reason to require otherwise.

There must be a legitimate business reason to collect personal information. Share Personal Information only with individuals who have a legitimate need for it and who will protect it properly. Personal information should be retained only for as long as necessary and the strictest standards for disposal of personal information must be employed.

Copying personal information (hard or soft copy) or transferring/storing personal information on portable devices is prohibited unless there is an approved business need and the personal information must be password protected or encrypted.

Trading on Inside Information

It is important for FPG to provide guidance on trading on inside information in this Code of Conduct document because it can result in you being subject to civil or criminal actions, and damage FPG Insurance's public image and relationships with third parties.

“ You may not use ‘inside’ information to trade securities for your personal benefit ”

During interactions with customers, business partners, agents, brokers and other third parties, you may obtain material non-public or “inside” information that is commercially sensitive. Keep in mind that securities laws apply to everyone, not just employees of public companies. If you come into possession of inside information you cannot profit from it by buying or selling securities yourself, nor can you pass on the information to others for them to profit themselves or to profit on your behalf.

Inside (Non-Public) Information is information about a company that is not known to the general public and that a typical investor would consider important in making a decision to buy, sell or hold the company's securities. It may include information that something is likely to happen or even just that it may happen.

What might be considered inside information?

- Projections of future earnings or losses
- Anticipated growth rates
- Negotiations, discussions, and agreements regarding significant acquisitions, orders or strategic relationships
- Changes in management
- Significant new products and product launches
- The gain or loss of a substantial customer or client
- Information regarding securities offerings or other financing activities

What happens if I trade securities based on inside information? Trading on the basis of inside information or passing inside information to anyone else who trades (even if you receive no financial benefit), is a crime and can result in significant fines and/or imprisonment. Inside trading rules are strictly enforced. You may also be subject to disciplinary action by the Company, including termination of your employment.

Financial Reporting & Records

FPG Insurance must produce sound financial records and statements in order for management to make informed decisions, and to meet the reporting and disclosure requirements the Insurance Regulator, our shareholders and other stakeholders.

We require that all transactions are properly recorded in accordance with the Company's accounting policies and all applicable laws and regulations. Employees must maintain records that are accurate, honest and represent the facts. You must never provide or enter information in the Company's books or records that intentionally misleads, misrepresents, misinforms, omits, or disguises the true nature of any transaction or result.

You are also expected to fully cooperate with independent and internal auditors and should immediately report any suspected violations or concerns to your Manager.



“ Never mislead, misrepresent, omit or disguise the true nature of a transaction or result ”

Environment

FPG Insurance believes it has an ethical responsibility to protect the environment and comply with environmental laws and regulations. It is important for us to reinforce that commitment in this Code.

We are committed to the protection of the environment as part of every decision we make. Responsible environmental actions are not only important to our customers, business partners, agents and brokers, it is the right thing to do. Our goal is to avoid any situation that may lead to unacceptable environmental or health hazards for employees, the public or the environment in general.

“ Respect for the environment where we operate is good business ”



Social Media & Public Disclosures

FPG Insurance's public image is key to building trust with its employees, customers, business partners, agents, brokers, stakeholders and the public. To ensure we maintain this trust, all employees must protect the Company's public image. It is therefore important that our public communications are carefully managed.

You are not authorised to speak on behalf of the Company in public. Additionally you are not permitted to publicly comment on issues related to FPG including the business dealings and employees of FPG.

This restriction applies to commenting in blogs, chat rooms or in social networking sites, making comments in an open forum and speaking with the media or journalists.

Remember that anything posted to social media is public and is accessible to anyone at any time.

If your position responsibilities involve developing and maintaining FPG's Website, Facebook pages and other forms of social media, you must exercise the highest level of professional standards expected of someone in your position.

All requests for public comments should be referred to your Manager.

" Keep FPG information within the Company "

“Speak Up”

WHAT SHOULD I DO IF I THINK A VIOLATION HAS OCCURRED?

If you believe a violation of this Code of Conduct has occurred or you have become aware of conduct that may be contrary to the Code of Conduct, always try to discuss this first with your Manager. Your Manager has an obligation to either take action, to resolve the issue or escalate it. If you have discussed it with your Manager and you feel the issue has not been resolved, or if the violation involves your Manager, and you do not feel comfortable discussing it with your Manager, then you can contact your Manager’s supervisor, your local Audit Manager or the Country CEO.

What happens if I feel uncomfortable talking to management or they have not resolved the issue?

We encourage you to make a report in your local language, via an external reporting channel. This external reporting channel is operated by an independent third-party provider (Navex Global) and cannot be traced back to your email or computer. This external reporting channel allows you to voice your concerns, confidentially and anonymously. Navex Global will pass your concerns, but not your name (if you choose to remain anonymous), to a senior member of staff within the FPG Corporate Head Office in Singapore.

Should I try to investigate something myself?

Do not try to investigate or resolve a matter on your own. Your responsibility is to report a violation or concern. We take your reports seriously and will thoroughly investigate all reported violations or concerns. Please leave your contact information if you feel comfortable doing so and if you are prepared to cooperate in any investigation.

Will I get in trouble if I report a violation?

No you will not get into trouble. Absolutely no retaliation will be taken against anyone who reports an alleged violation of any law or company policy, including this Code of Conduct. Anyone who retaliates may be subject to civil, criminal, and administrative penalties as well as disciplinary action, up to and including termination of employment. Remember, you have the option to use the external reporting channel operated by an independent third-party provider (Navex Global) if you feel uncomfortable discussing an alleged violation with local or regional management. The external reporting channel will allow you to remain anonymous.

Who should I ask questions concerning this Code of Conduct?

You should talk to your Manager first. However, if you do not feel comfortable talking to your Manager, you may also talk to your Manager’s Supervisor, your local Audit Manager or Country Human Resources.

How do I report violations of the Code of Conduct?

You can make an anonymous report in your local language, via the internet. The link listed below will direct you to the Navex Global reporting system. Encryption software is in place that will ensure your identity, email address and computer cannot be traced by Navex Global or FPG. The Navex Global reporting site contains a FAQ section if you would like to learn more about the anonymous reporting system before making a report.

The internet address for the Navex Global anonymous reporting system is:

<http://FPGIns.ethicspoint.com>

Possible Questions & Answers

Question

This Code of Conduct covers more areas than my local policies and procedures. In some cases, my local policies and procedures are more detailed. Is this ok?

Answer

This Code of Conduct is designed to outline broad principles of business conduct. Your local policies and procedures should be consistent with this Code of Conduct; therefore, you can follow both. If you have any questions you should discuss them with your Manager or HR.

Question

The law in my country permits me to do something but the Code does not. What should I do?

Answer

We fully recognise that laws vary from country to country and require employees and anyone representing FPG Insurance to comply with all local laws. However, to the extent the Code includes higher standards, we require adherence to the standards noted in the Code of Conduct.

Question

How do I know what laws and regulations I need to know about?

Answer

You should talk to your Manager about the laws and regulations that apply to your job. You should also talk to HR to make sure there are no other laws or regulations you need to follow.

Question

My sister is a part owner of an insurance broker that deals with FPG Insurance business. Is this ok?

Answer

Your sister's company may work with FPG business, however, you must disclose this relationship to your Manager and you must not be involved in the bidding selection process.

Question

A broker has offered to host my team at a sporting event. The tickets cost at least US\$150 each. The total value of the event will be over US\$ 2,000. Can I accept the offer?

Answer

While social events with customers and business partners represent valuable relationship building opportunities, you must not allow gifts and entertainment to influence your business judgment. You should politely decline unless you have the necessary approval.

Question

Can I raise money at work for a political party?

Answer

Generally, volunteering to work on a political campaign in your own capacity is allowed. However, you cannot conduct political activities, such as fund raising, at work.

Question

I have met my revenue quota for the third quarter. A co-worker in Accounting tells me that I can move my remaining revenue for this quarter to the next quarter. Is this okay? It is still the same amount of revenue for the year.

Answer

This is not acceptable. Maintaining the accuracy and integrity of all accounting records should never be compromised, as this may affect the manner in which management make decisions regarding the business.

Question

I am going to make a comment on my Facebook or other social networking sites about some recent employees investigated for stealing company property. Will I get in trouble?

Answer

Yes. Making public comments about company investigations under the Code of Conduct is not allowed. This includes making comments on your own Facebook site.

This FPG Insurance Code of Conduct, was approved by the FPG Regional Managing Director during July 2018 and is to be implemented by all FPG Insurance country operations. This Code of Conduct takes precedence over any Country Policy concerning the same subject matter.

Your local HR may provide you with a translated copy of this Code of Conduct, however please note that the English version will prevail.