

## QBE European Operations Anti-bribery Communication

New anti-bribery legislation came into force in the UK on 1 July 2011. The Bribery Act 2010 (“the Act”) consolidates existing anti-bribery and corruption law but also creates a new corporate offence for a firm ‘failing to prevent bribery’ by a person associated with it. Therefore anyone who might be considered an associated person of QBE European Operations (“QBE EO”) should be aware of the Act and QBE EO’s Anti-bribery stance.

Generally, the definition of an associate person is very broad and can include any person who performs services for, or on behalf of the organisation. For QBE EO, an associated person could include its coverholders, third party agents, service providers and intermediaries. The Act is far-reaching and not just limited to acts or persons acting in the UK – it will apply to the acts of QBE EO’s associated person, worldwide.

More information on the Act can be found at:

<http://www.justice.gov.uk/guidance/docs/bribery-act-2010-quick-start-guide.pdf>

QBE EO’s culture and values are driven by the QBE Essential Behaviours, which includes “Utmost Integrity”. With this foundation in place, QBE EO established its anti-bribery policy which can be summarised by the statement below:

### QBE Operations Anti-Bribery Policy Statement

**QBE’s Essential Behaviour of Utmost Integrity is supported by EO’s commitment to conduct business in an open and honest manner and to maintain ethical standards in every aspect of business.**

**QBE EO has no appetite for using bribery to gain a business advantage and recognises that bribery poses a significant regulatory, legal and reputational risk.**

**For practical purposes bribery can be described as offering or giving any advantage (whether financial or not) intending to:**

- **influence a person to act improperly, or**
- **influence a foreign public official to obtain a business advantage (including facilitation payments).**

The above statement is supported by QBE EO’s Adequate Procedures framework. This includes the QBE Code of Conduct which sets out the standard of behaviour for all employees, and the Conflicts of Interest policy which prohibits employees requesting or accepting any advantage to perform their role improperly.

If you require further information on QBE EO’s Anti-bribery Policy please get in touch with your usual QBE EO contact.