



Code of Ethics

April, 2015



Code of Ethics

Our standards of integrity & professionalism



Code of Ethics

ARAG is a pioneer in legal insurance. Ever since our enterprise was founded in Dusseldorf in 1935, our mission has been to enable every citizen – and not just those who can afford it – to assert their legal rights. Through our commitment, we have succeeded in significantly empowering countless ordinary citizens and promoted equality in law.



“We pride ourselves on dealing with others in a professional manner based on integrity and transparency. We have various policies and management systems that engender this ethos throughout our business, but none are more important than our Code of Ethics. By working in accordance with this code we aim to attract the trust of our customers and insureds who can then be confident that they have chosen the right partner in ARAG.”

Introduction

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Our approach

ARAG plc is dedicated to promoting the highest standards of professionalism and behaviour. Our ARAG Essentials (core values) provide the fundamental principles, but this document provides our staff and customers with a clear understanding of what drives our business ethically. This policy should also be read in conjunction with our Corporate & Social Responsibility policy which clearly sets out our commitments to the environment and our community (including charitable activities).

We align our policy with the expectations of other relevant codes of ethics, not least those of the Managing General Agents Association (MGAA) and the Chartered Institute of Insurance (CII). We will also encourage others to do the same.

Our approach is simple; we make four commitments.

Our Four Commitments

Commitment 1: Legal & Regulatory Compliance

We will comply with all relevant laws and regulations. To us, this means ARAG staff will:

- Work not only within the meaning of the law, but also the spirit of the law, and feel able to refuse to act when to do otherwise would breach a law or regulation;
- Take personal responsibility for effective compliance arrangements such as personal authority levels and underwriting and claims obligations;
- Make every reasonable effort to prevent unethical and illegal practices, not least via the Company's stringent Sanctions, Politically Exposed Persons and Anti-Money Laundering checks;
- Act in the utmost good faith in their dealings with others
- Report any breaches of this Code, regulations or laws to an appropriate person;
- Respect confidential and business sensitive information (see our ISO 27001 and Clear Desk policies for more information);
- Not use information from work improperly and/or to their personal advantage or gain;
- In accordance with the Company's Compliance policies, fulfil all obligations to avoid potential or actual conflicts of interest;
- Deal promptly, transparently and in a co-operative manner with all regulatory and/or legal matters;



Commitment 2: Act with the highest ethical standards

Our staff will always act with integrity and in a manner fitting with the ARAG Essentials, including:

- Being honest, trustworthy and open;
- Being reliable, dependable, respectful and not taking unfair advantage of others;
- Not bringing ARAG, or our industry into disrepute in or outside of work;
- Not making false or misrepresentative statements in respect of others in the industry ;
- Not offering or accepting gifts, hospitality or services which could, or might appear to, imply an improper obligation (see our Inducement Policy for more details);
- Promoting our ethical values at all times and encourage our partners to do similar;
- Wherever possible, basing decisions on full knowledge of the facts rather than on assumptions;
- Ensuring that all financial obligations (e.g. invoices, commissions and payments due) are met and without undue delay;
- Always meeting our solvency requirements;
- Being aware of the ethical arguments when considering whether to underwrite a particular risk.

Commitment 3: Provide a high standard of service

We must always strive to provide the best possible experience to our customers, the insured and each other. This includes, but is not limited to:

- Communicating accurately and using plain, easy-to-understand language;
- Ensuring adequate and correct records are kept;
- Acting in a prompt and timely manner (and always within any Service Level Agreements including the Company's Complaints Procedure);
- Acting with skill, care and diligence;
- Acting within individual ability and authority limits. Knowing when to seek help and when to refer to others;
- Proactively keeping knowledge, skills and expertise up to date and, if a line manager, helping to direct the learning goals of those in their team;
- Accepting responsibility and accountability;
- Handling claims in a fair, objective and efficient manner.

Commitment 4: Equality of service and treatment

We are committed to building and maintaining an organisation that is free from any form of discrimination and one that will treat everyone with dignity and respect. This includes, but is not limited to:

- Adhering to our Equal Opportunities policy;
- Obeying all equality and diversity laws;
- Challenging and reporting unlawful or otherwise unfair discriminatory behaviour and practices;
- Promoting a tolerant approach.

Breaches, Remedy & More

Breaches

ARAG will investigate all alleged breaches of law, regulation and/or this policy. We encourage our business partners and staff to highlight any deficiency they may come across so that we can act swiftly and appropriately. We will not penalise those who, in good faith, notify us of a concern and we encourage people to use our Whistle-Blowing procedures if appropriate to do so.

In the event of an alleged breach, the Senior Management Team will appoint the most appropriate person(s) to lead an investigation into the matter. If necessary, ARAG plc will request the assistance of its parent company, ARAG SE to ensure any such investigation cannot be prejudiced by the involvement of those close to the alleged breach.

Remedy

ARAG will provide the complainant (if one exists) with a detailed summary of our investigation, its conclusions and any proposed remedial action. Where appropriate, we may ask the complainant to be part of the investigation and/or involved in drafting the remedial action.

More

This policy is only part of our commitment to ethical and professional conduct. ARAG has various other policies which guide us in this respect, not least our ISO27001 and Treating Customers Fairly policies. If you want to learn more about our ethical practices, please refer to www.arag.co.uk or speak to a member of our Compliance team.