

## Swiss Re Modern Slavery Act Transparency Statement

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This statement is made on behalf of the Swiss Re group of companies (the **Swiss Re Group**) pursuant to section 54(1) of the UK Modern Slavery Act 2015 and constitutes the Swiss Re Group's slavery and human trafficking statement for the financial year ending 31 December 2023. This statement sets out the steps that the Swiss Re Group has taken and is taking to ensure that slavery and human trafficking are not taking place in any of its supply chains or in any part of its own business.

### The Swiss Re Group

The Swiss Re Group is a leading wholesale provider of reinsurance, insurance and other insurance-based forms of risk transfer. Dealing directly and working through brokers, the global client base consists of insurance companies, mid-to-large-sized corporations, public sector clients, and retail customers. The operating segments comprise of:

- The Reinsurance business, offering traditional reinsurance solutions, insurance-linked securities and other insurance-related capital market products in both the property and casualty and life and health sectors;
- The Corporate Solutions business, providing insurance capacity to mid-sized and large multinational corporations, and
- The iptiQ business, providing a digital business to business to consumer white-label insurance platform.

Headquartered in Zurich, Switzerland, Swiss Re operates through a network of offices in 29 countries. For more information about the Swiss Re Group, and for a list of Swiss Re's significant subsidiaries and businesses, please see our [Swiss Re 2023 Annual Report | Swiss Re Annual Report](#).

### Our commitment to sustainability

Swiss Re has a long-standing commitment to sustainability. Swiss Re seeks to align with expectations outlined in the UN Guiding Principles on Business and Human Rights, commonly known as the Ruggie Framework, and is a signatory to the UN Global Compact. We are also signatories to the UN-supported Principles for Responsible Investment and to the United Nations Principles for Sustainable Insurance. These ethical principles inform part of our [Group Code of Conduct](#), which provides guidance to Swiss Re employees in making responsible decisions and achieving results with utmost integrity.

We recognise the importance of upholding human rights, labour standards and environmental protection in fostering responsible business practices and sustainable development. As such, we have developed the Swiss Re Environmental, Social and Governance ("ESG") Risk Framework ("**ESG Risk Framework**"), which is based on principles of environmental protection, respecting human rights and promoting good corporate governance. These principles are encapsulated in three Umbrella Guidelines, i.e. Environmental, Social/Human Rights and Governance.

The Group Executive Committee has further embedded these principles into Swiss Re Group's business through the implementation of the Group Sustainability Strategy. To learn more about our commitment to sustainability, the Group Sustainability Strategy, and the measures we have

undertaken to uphold this commitment, please see our [sure sustainability report 2023.pdf \(swissre.com\)](#) the [Sustainability](#) section of our website.

### **Our policies in practice**

The Code of Conduct requires Swiss Re to promote a diverse and inclusive environment where everyone is treated with respect, free from discrimination and harassment. We are committed to fair and equal treatment, and provide equal opportunity for all individuals, regardless of age, race, ethnicity, nationality, gender, religion, sexual orientation, disability, or any other class protected by law.

Recruitment of all employees by Swiss Re is conducted in accordance with our Global Standard on Recruitment. This requires all applicants to undergo formal pre-screening for review of their eligibility, work permits and completeness of documents. All Swiss Re employees are employed by mutual agreement through a written contract governed by local law and terminable by either party.

All employees and candidates have access to an externally-hosted Whistleblowing Hotline to report suspicions of misconduct openly and anonymously. The Hotline is accessible by phone or via a website, both of which are operated by an independent service provider. All reports are treated in confidence, and Swiss Re maintains a zero-tolerance policy regarding retaliation against any individual reporting in good faith.

### **Our supply chain and procurement processes**

Swiss Re procures various goods and services to support its operations governed by its Third Party Framework including operating expenses related to the supply chain. The main categories in Swiss Re's supply chain, based on spend, comprise IT application services, consulting services, legal services, contractors, recruitment services, office and equipment, leasing/rent, and external investment managers. With a focus on cost and risk factors, Swiss Re takes responsibility for vetting external vendors, particularly those critical to operational resilience or surpassing a minimum spend threshold. Swiss Re aims to select vendors offering optimal value while balancing demand, financial impact, and operational, legal, and compliance risks. Committed to the UN Global Compact and its Ten Principles, Swiss Re's Code of Conduct outlines these principles covering human rights, labour, environment, and anti-corruption. When selecting new products and vendors, Swiss Re examines whether external vendors comply with the Swiss Re Code of Conduct. Since 2016, Swiss Re has continuously promoted sustainability among targeted vendors to provide transparency on their sustainability performance. To support this request, Swiss Re collaborates with an external ESG assessment company to evaluate suppliers using a wide variety of ESG screening criteria aligned with the Code of Conduct and referencing the UN Global Compact Principles.

### **Our clients and business transactions**

The ESG Risk Framework is an advanced risk management instrument that enables Swiss Re to identify, assess and address environmental, social/ human rights, and governance-related risks potentially associated with its transactions. This includes human rights violations, forced labour and slavery. The framework is applied across Swiss Re's business activities, including re/insurance transactions and investments, where information granularity is available and allows for a meaningful ESG risk assessment. For more details, see the ESG Risk Framework publication [here](#).

## **Our investments and corporate transactions**

Swiss Re invests its assets responsibly via a controlled and structured investment process, integrating ESG criteria along the entire investment process. As part of that, we consider better ESG rated companies for our listed equity and corporate bond investments.

Furthermore, Asset Management's approach to exclusion is based on the Group-wide ESG Risk Framework, which sets criteria for what Swiss Re considers acceptable business and may lead to restrictions of companies or countries from our investment universe.

Additionally, Swiss Re considers the way companies conduct their business by screening their alignment with the UN Global Compact Principles on human rights, labour, environment, and anti-corruption, where information granularity is available.

Due diligence is conducted for all corporate transactions in accordance with Swiss Re's Code of Conduct. This includes pre-due diligence screening using internal and external resources in order to identify and assess ESG and regulatory risks. During the due diligence process, the deal team works closely with Group Risk Management and Compliance functions, as well as when required with external advisors, to perform sustainable business risk, political risk and compliance assessments. Swiss Re is part of major sustainability indices based on sustainability ratings received by external data providers. To learn more about our investing approach, please see the Responsible Investing in Practice section of our website.

## **Our action against money laundering and financial crime**

In order to safeguard against the potential misuse of Swiss Re for money laundering activities, an extensive Global Anti-Money Laundering Programme (the "AML Programme") has been established to guarantee adherence to Anti-Money Laundering and Counter-Terrorist Financing (AML) statutes and regulations. This program encompasses risk-based assessment of counterparties, continuous screening against specialized AML watchlists, and risk-based monitoring of financial transactions.

Swiss Re also implements mandatory AML training for all employees supporting awareness of the requirement to report illegal, suspicious or unusual activity to their designated group or regional money laundering reporting officer, and in turn the reporting of such suspicions to relevant authorities. An anonymous whistleblowing hotline is also made available for reporting concerns. A regulatory monitoring solution is in place to track regulatory changes and emerging risks.

Swiss Re is subject to internal and independent reviews and audits to test the design and effectiveness of the AML Programme.

Swiss Re adheres to the Recommendations of the Financial Action Taskforce, the leading international organization in the fight against money laundering and terrorist financing.

## **Approval**

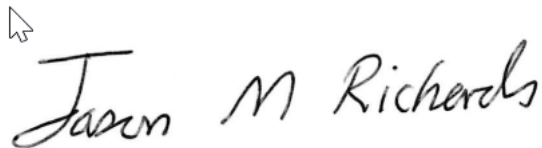
The Board of Directors of Swiss Re Ltd approved this statement at its meeting of 12 March 2024.

**Approval**

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Jacques de Vaucleroy  
Vice Chairman of the Board of Directors  
For and on behalf of Swiss Re Ltd



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Jason Richards  
Country President, United Kingdom