



BACKGROUND & SCOPE

This document sets out MS Amlin Insurance SE's ("MS AISE") Human Rights Policy.

Document Purpose and Background

To outline the Human Rights Policy for employees and workers of MS AISE.

This document was created in 2023 as a newly created policy.

Intended Audience

This policy set out in this document applies to all MS AISE staff, contractors, consultants, agency workers, seconded workers and suppliers working for MS AISE or on its behalf in any capacity.

This policy sets out MS AISE's position with respect to human rights and modern slavery.

Document Ownership

The responsibility for this policy rests with the MS AISE MANCO. The policy shall be reviewed by the Head of Strategy and Head of HR jointly at least annually or more frequently as required. Revisions of this policy shall be approved by the MS AISE MANCO.

The owner of this document is responsible for ensuring that:

- The content of this document, including any translations, remains complete, accurate, and up-to-date and that it is read by all appropriate staff; and
- The review process is completed in line with the appropriate timetable; and
- Processes and procedures exist in local offices to implement relevant policies. These must be stored centrally and be accessible to all staff.

An annual attestation is made to the effect that the above have been completed.

Changes to this Document

All reviews and changes to this document must be managed in accordance with the requirements set out in the Policy & Procedures Framework.

INTRODUCTION

MS AISE is a specialist P&C and Marine insurer with local teams operating across markets within Europe and the UK. As experts in risk, we understand the unique challenges faced by our clients and partners. With a desire to provide an unparalleled service experience, we work

closely with our clients to deliver bespoke and digitally traded solutions to meet their insurance needs.

MS AISE believes that everyone deserves to be treated with fairness, respect, equality and dignity and respect for human rights is integral to its values. MS AISE is committed to acting ethically and with integrity in all its business dealings and relationships. To that end, MS AISE recognises its responsibility to respect human rights and seeks to act in accordance with internationally-recognised human rights and standards, including the International Bill of Human Rights, the UN Global Compact 10 Principles, the International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work and the United Nations Guiding Principles on Business and Human Rights, making them integral to the way it operates. MS AISE is working hard to guard against being complicit in human rights violations and to uphold the human rights of its staff and any other individuals that it is in contact with, either directly or indirectly, for instance, its suppliers and business partners.

OBJECTIVE

MS AISE's Human Rights Policy seeks to set out its responsibilities and of those working on its behalf in observing and upholding its position on human trafficking and modern slavery. The Policy seeks to sets out MS AISE's expectations and principles, which underpin its commitment to human rights and to ensure that MS AISE continues to make a positive and sustainable difference to the lives of those whom it works and interacts with.

The objective of this policy is to make everyone working at or with MS AISE aware that harassment and discrimination are unacceptable practices and are incompatible with the standards of MS AISE as well as being a violation of the law.

MS AISE is committed to providing an environment free of human rights violations, where all individuals are treated with respect and dignity, can contribute fully and have equal opportunities.

The aim of this policy is to create a climate of understanding and mutual respect for the dignity and worth of each person, so that each employee feels a part of and able to contribute to the community. Each of our employees is obliged to comply with this Human Rights Policy.

Under the UDHR, every person has the right to be free from harassment and discrimination. All human beings are born free and equal in dignity and rights. Our employees are protected against human rights violations by co-workers and management; and they are also protected from the actions of others who enter the employment context, such as clients, brokers or external service providers. Employees are protected while off the work site, or outside of normal working hours, where activities are connected to their work.

In essence, MS AISE will:

- seek to avoid causing or contributing to adverse human rights impacts through its own activities and address such impacts, if they do occur, in a timely and appropriate manner;
- seek to prevent or mitigate adverse human rights impacts that are directly related to its operations, products and services through its business relationships;
- provide for, or cooperate in their remediation through legitimate processes, if it has identified that it may have caused or contributed to any adverse human rights impacts; and will continue to look for ways to support the promotion of human rights within any of its operations which are within its sphere of influence.

BASIC PRINCIPLES

The statements below draw upon the International Bill of Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work and summarise MS AISE's basic principles on Human Rights.

Diversity and Inclusion We value and advance the diversity and inclusion of the people with whom we work. We are committed to equal opportunities and are intolerant of discrimination and harassment. We strive to maintain a work environment that is free from discrimination or harassment on the basis of race, sex, colour, national or social origin, ethnicity, religion, age, disability, sexual orientation, gender identification or expression, political opinion or any other status protected by applicable law. We do not tolerate disrespectful or inappropriate behaviour, unfair treatment or retaliation of any kind and are fully committed to eliminating discrimination in recruitment, training and working conditions.

Freedom of Association and thought MS AISE recognises the importance of dialogue with its employees about their working environment and actively takes measures to seek employees' views about working at MS AISE through regular confidential surveys and in local social dialogue committees.

We respect our employees' right to join or form a works council or labour union without fear of reprisal, intimidation or harassment. Where employees are represented by a legally recognized union, we are committed to establishing a constructive dialogue with their freely chosen representatives. MS AISE is committed to bargaining in good faith with such representatives.

Workplace Security We are committed to maintaining a workplace that is free from violence, harassment, intimidation and other unsafe or disruptive conditions due to internal and external threats so that employees privacy and dignity is safeguarded.

Health & Safety The health and safety of our employees is of high importance. Our policy is to provide a safe and healthy workplace and comply with applicable health and safety laws and regulations, as well as internal requirements. We work to provide and maintain a safe, healthy and productive workplace, in consultation with our employees, by addressing and remediating identified risks of accidents, injury and health impacts where applicable.

Forced & Child Labour / Human Trafficking MS AISE will not use child labour and will comply with all relevant and applicable laws in this regard. MS AISE supports legitimate workplace apprenticeships and other similar programmes for young people to introduce them to the workplace that comply with applicable laws and regulations. MS AISE also has a zero tolerance to human trafficking or the use of forced, bonded or involuntary labour.

Employment terms MS AISE provides all staff with clear contracts of employment which detail the terms and conditions of its staff employment. MS AISE complies with all applicable law in relation to its employment practices.

Remuneration MS AISE provides wages and benefits that meet national standards. MS AISE is committed to equal pay and benefits for men and women for work of equal value.

GRIEVANCE AND REMEDIATION

Harassment and discrimination will not be tolerated, condoned or ignored at MS AISE.

Where a human rights violation is identified, MS AISE will work with all parties involved to seek access to remedy and justice for the victim. MS AISE is committed to ensuring that all unethical behaviour is called out and has a Speak Up policy and process which it encourages all staff to use in order to raise any concerns they may have. MS AISE will investigate, address and respond to the concerns of employees and anyone raising a genuine concern which is in the public interest will be protected from victimisation or retaliation.

OPERATIONAL RESPONSIBILITY & MONITORING

The MS AISE MANCO is responsible for monitoring adherence to this policy. However, operational responsibility was delegated to the Head of HR (HoHR) to ensure measures for monitoring adherence to this policy are implemented. In addition, the HoHR acts as MS AISE's Human Rights Controller (HRC) as required by MS&AD and is the ultimate contact person for any Human Rights related queries or concerns.

MS AISE recognises that human rights impacts may develop and change over time. MS AISE will review its Human Rights policy regularly with regard to its relevance and effectiveness and will address any deficiencies as necessary.