



## **MS AMLIN UNDERWRITING LIMITED**

### **HUMAN RIGHTS POLICY**

#### **1 Introduction**

This document sets out MS Amlin Underwriting Limited's (MS Amlin) Human Rights Policy.

##### **1.1 Document Purpose and Background**

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

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

##### **1.2 Intended Audience**

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

This policy sets out MS Amlin's position with respect to human rights and modern slavery and sits alongside our Health and Safety Policy, our Modern Slavery Statement and our Supplier Code of Conduct.

##### **1.3 Document Ownership**

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.

##### **1.4 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*.

#### **2 Policy**

MS Amlin believes that everyone deserves to be treated with fairness, respect, equality and dignity and respect for human rights is integral to its values. MS Amlin is committed to acting ethically and with integrity in all its business dealings and relationships. To that end, MS Amlin recognises its responsibility to respect human rights and seeks to act in accordance with national and internationally-recognised human rights and standards, including the UK Human Rights Act

1998, 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 Amlin 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 customers, its suppliers and business partners.

MS Amlin's Human Rights Policy seeks to sets out MS Amlin's expectations and principles, which underpin its commitment to human rights and to ensure that MS Amlin continues to make a positive and sustainable difference to the lives of those whom it works and interacts with.

MS Amlin 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;
- not engage with any third parties that are in breach of this Policy; and
- 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.

### 3 Statements

The statements below draw upon the International Bill of Human Rights and the ILO Declaration on Fundamental Principles and Rights at Work:

1. **Child Labour:** MS Amlin will not use child labour and will comply with all relevant and applicable laws in this regard. MS Amlin has in place and supports legitimate workplace apprenticeships and other similar programmes for young people to introduce them to the workplace that comply with applicable laws and regulations.
2. **Modern slavery:** MS Amlin has a zero tolerance to human trafficking or the use of forced, bonded or involuntary labour as set out in its Modern Slavery Statement which is accessible on the MS Amlin website at <https://msamlin.com>. As noted in the Modern Slavery Statement, prior to engaging with suppliers, MS Amlin conducts comprehensive and proportionate due diligence checks in relation to reputable suppliers to ensure that we do not inadvertently support modern slavery.
3. **Health and safety:** All MS Amlin employees work in an environment that is safe and healthy and which is line with our Health and Safety Policy.
4. **Freedom of Association and thought:** MS Amlin recognises the importance of dialogue with its employees about their working environment and actively takes measures to seek employees' views about working at MS Amlin through regular confidential surveys.
5. **Equality of treatment:** MS Amlin is fully committed to eliminating discrimination in recruitment, training and working conditions on grounds of race, colour, sex, age, religion, political opinion, nationality, sexual orientation, disability or social origin. MS Amlin promotes equality of opportunity and treatment as outlined in its Code of Conduct.

6. **Employment terms:** MS Amlin provides all staff with clear contracts of employment which detail the terms and conditions of its staff employment. MS Amlin complies with all applicable law in relation to its employment practices.
7. **Remuneration:** MS Amlin provides wages and benefits that meet national standards. MS Amlin is committed to equal pay and benefits for men and women for work of equal value.

#### 4 Underwriting Considerations

MS Amlin recognises that specific attention must be paid to monitoring and assuring the respect and protection of human rights in our underwriting activities as well as in connection with employment, suppliers, and investments.

To that end, considerations are included here on particular human rights that may be impacted directly or indirectly by our underwriting activities, and where attention should be paid to human rights as part of underwriting decision-making processes. Underwriters are required to make reasonable efforts to understand the potential impact of activities as part of their due diligence, and make efforts to avoid causing or contributing to (and seek to prevent or mitigate, and then remediate) adverse human impacts.

This list is not exhaustive, and underwriters are encouraged to apply their own expertise within their evaluation of the business, and if needed seek support or further advice from the Head of Sustainability.

- Right to equality before the law and to non-discrimination of minorities
- Right to be free from all forms of forced or compulsory labour
- Rights to freedom of association and collective bargaining
- Right to freedom of thoughts, conscience, religion, opinion, information and expression
- Right to work and right to enjoy just and favourable conditions of work
- Right to health and an adequate standard of living
- Right to privacy

Furthermore the following are potential human rights violations identified through the development of MS Amlin's Sustainability Strategy that we would consider to be egregious, and which warrant specific consideration as to how they may be avoided or mitigated as part of our robust underwriting decision-making:

- Abuses such as slavery or war crimes
- Child labour
- Restriction of access to water
- Environmental health e.g. release of toxins into waterways
- Rape and sexual abuse
- Torture

#### 5 Grievance and remediation

Where a human rights violation is identified, MS Amlin will work with all parties involved to seek access to remedy and justice for the victim. MS Amlin 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 Amlin 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.

#### **6 MS Amlin's responsibility**

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