



MS Reinsurance

An MS Amlin AG Company

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Human Rights Policy

1. Introduction

The terms “the Company”, “MS Reinsurance” or “the organization”, as used throughout this document, refers to MS Amlin AG, including all its branches, as well as to all its subsidiaries.

1.1 Background and purpose

MS Reinsurance believes that everyone deserves to be treated with fairness, respect, equality and dignity and respect for human rights is integral to its values. MS Reinsurance is committed to acting ethically and with integrity in all its business dealings and relationships.

MS Reinsurance has established this human rights policy to outline this commitment.

1.2 Scope and intended audience

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

This policy sets out MS Reinsurance’s position with respect to human rights and modern slavery and sits alongside our Code of Conduct, our Health and Safety Policy and our Supplier Code of Conduct.

1.3 Changes to this policy

This Policy will be reviewed, at least annually, by the Document Owner. All changes made to this Policy, other than typographical, grammatical or metadata are subject to approval according to the Policy on Management of Policies and Standards as well as MS Reinsurance’s approval procedures and authority matrix. Pre-approval of any changes made to this document should be sought where this is a regulatory or internal or group requirement.

1.4 Compliance

Compliance with this Policy is mandatory, and it is the responsibility of the Document Owner to ensure that all relevant personnel are instructed and trained to:

- be familiar with the contents of this Policy.
- exercise sound judgement.
- act at all times within the requirements of this Policy.

In case of uncertainty or if exceptions are necessary, guidance should be sought in the first instance from the Document Owner.

1.5 Handling of breaches

The Document Owner is responsible for ensuring adherence to this policy on a continuous basis and ensuring that any breaches are identified, communicated, and remediated in a timely manner.

In cases of material breach of this policy, reporting of the breach shall be communicated to the Document Owner, escalated to relevant stakeholders within an appropriate timeframe set out in procedures and remedial action(s) must be taken.

The Document Owner shall report a summary of material breaches of this policy to the relevant Committees and/or Board as set out in this document and according to internal and group procedures.

2. Human Rights Principles and Statements

2.1 Human Rights Principles

MS Reinsurance recognises its responsibility to respect human rights and seeks to act in accordance with national and internationally-recognised human rights and standards, including the Bermuda Human Rights Act 1981, 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 Reinsurance 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 cedents, its suppliers and business partners.

When conducting its business, MS Reinsurance will:

- seek to avoid causing or contributing to adverse human rights impacts through its own activities and seek to 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 third parties that are known to be in breach of this Policy;
- 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.

2.2 Human Rights 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 Reinsurance will not use child labour and will comply with all relevant and applicable laws in this regard. MS Reinsurance 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 Reinsurance has a zero tolerance approach to human trafficking or the use of forced, bonded or involuntary labour. Prior to engaging with suppliers, MS Reinsurance

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 Reinsurance 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 Reinsurance recognises the importance of dialogue with its employees about their working environment and actively takes measures to seek employees' views about working at MS Reinsurance through regular confidential surveys.
5. **Equality of treatment:** MS Reinsurance is fully committed to eliminating discrimination in recruitment, training and working conditions on grounds of race, colour, place of origin, ethnic or national origin, sex or sexual orientation, marital status, disability, family status, age, profession, religion, faith or beliefs or political opinion. MS Reinsurance promotes equality of opportunity and treatment as outlined in its Code of Conduct.
6. **Employment terms:** MS Reinsurance provides all staff with clear contracts of employment which detail the terms and conditions of its staff employment. MS Reinsurance complies with all applicable law in relation to its employment practices.
7. **Remuneration:** MS Reinsurance provides wages and benefits that meet national standards. MS Reinsurance is committed to equal pay and benefits for men and women for work of equal value.

2.3 Human Rights Due Diligence

MS Reinsurance 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, engagement with our suppliers, and investments.

All MS Reinsurance functions are required to make reasonable efforts to understand the potential impact of activities and engagements with third parties 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 rights impacts.

Furthermore the following are potential human rights violations that MS Reinsurance would consider to be egregious, and which warrant specific consideration as to how they may be avoided or mitigated as part of our robust procurement, investment and underwriting decision-making:

- Abuses such as slavery or war crimes
- Child labour
- Restriction of access to water
- Rape and sexual abuse
- Torture

2.4 Grievance and remediation

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

2.5 MS Reinsurance's responsibility

MS Reinsurance will review its Human Rights policy regularly with regard to its relevance and effectiveness and will address any deficiencies as necessary.