

# Global Human Rights Policy

May 2019

**RG&A**



## Introduction

Reinsurance Group of America, Incorporated and all of its subsidiaries and affiliates (collectively, “RGA”) is a leading global provider of life reinsurance and financial solutions. Founded in 1973, RGA, a Fortune 500 company, is recognized for its deep technical expertise in risk and capital management, innovative solutions, and commitment to serving its clients. With headquarters in St. Louis, Missouri, and operations around the world, RGA delivers expert solutions in individual life reinsurance, individual living benefits reinsurance, group reinsurance, health reinsurance, facultative underwriting, product development, insurance services, technology, and capital-motivated reinsurance.

At RGA, we pride ourselves on our continuing dedication to conducting our global business fairly and ethically. We follow a strict equality and fairness ethos and do not tolerate violations of human rights, including acts of modern slavery and human trafficking.

## Purpose

The objective of the Global Human Rights Policy (“Policy”) is to detail expectations for our actions and behavior concerning human rights in accordance with applicable laws and regulations, our Code of Conduct, and RGA policies. This Policy intends to ensure that we, as good corporate citizens, reaffirm the importance of respecting human rights and work to fulfill our responsibility to respect the fundamental human rights of one another.

## Scope

This Policy is applied globally to all Workforce Members throughout RGA to ensure awareness and compliance to RGA’s human rights commitments. Workforce Members include any regular or temporary employee, contingent worker, contractor, consultant, or individuals representing or acting on behalf of RGA. This Policy also applies to all locations and situations where RGA business is conducted as well as all company-sponsored events.

## Our Commitment to Human Rights

RGA is committed to respecting human rights by seeking to avoid infringing on the rights of others. We expect Workforce Members to share this commitment to ensure our business respects and promotes human rights. Our commitment is formalized and manifested through our various policies, Code of Conduct, training modules, and ethical business practices. We are committed to working with and encouraging our suppliers, customers, and other business relationships to respect and uphold this Policy.

## Guiding Principles

Our commitment to human rights is based on the following guiding principles:

### General Labor Practices

We comply with all applicable labor laws, regulations, and guidelines, including those related to wages, benefits, hiring, promoting, hours worked, and working conditions.

### Diversity and Inclusion

We value all the individuals in our diverse workforce and recognize the importance of understanding, appreciating, and accepting individual differences.

### Forced or Compulsory Labor

We do not use or tolerate the use of force, debt-bonded indentured labor, involuntary prison labor, slavery, or any form of human trafficking in our business or supply chain.

### Workplace Health and Safety

We strive to provide and maintain a healthy and safe working environment that is free from violence, intimidation, or other unsafe or disruptive conditions.

## Harassment and Non-Discrimination

We believe everyone should be treated with respect and do not tolerate sexual, racial, or other forms of harassment, discrimination, and bullying in the workplace.

## Privacy

We respect individual privacy expectations and protect the personal information that we collect, use, and disclose in connection with our business.

## Legal Compliance

RGA adheres to all applicable local and international laws and regulations relating to and impacting the exercise of human rights. Should there be differences between the content of this Policy and laws or other applicable human rights standards, the more stringent requirements shall apply. RGA is committed to ensuring transparency in our business and in our approach to tackling the risk of human trafficking and modern slavery throughout our supply chains, consistent with our disclosure obligations under Section 54(1) of the United Kingdom Modern Slavery Act 2015.

## Policies and Training

RGA has established global policies that demonstrate our commitment to respecting human rights, including the policies listed below. We also provide training for Workforce Members about many of the standards and principles referred to in this Policy.

- Based upon our core values and principles, the **Code of Conduct** (“Code”) defines the ethical standards and global expectations for conducting business on behalf of RGA. The Code covers a wide range of topics relevant to the protection of human rights, including harassment and discrimination, workplace violence, protecting privacy, economic sanctions, and anti-bribery and corruption. Workforce Members are required to complete the online Code of Conduct training annually. This training includes an individual attestation by each Workforce Member that he or she understands the responsibility to comply with the rules and principles (including human rights issues) listed in the Code. The Code of Conduct is available to Workforce Members on the Policy Portal through the RGA intranet.
- RGA has other policies intended to promote legally compliant and ethical business conduct. Policies contributing to our commitment to preventing violations of human rights in our business include:
  - **Speak-Up Policy**
  - **Non-Retaliation Policy**
  - **Vendor Vetting Policy**
- RGA provides training for Workforce Members about many of the standards and principles referred to in this Policy. Following our mandatory training escalation process, these training modules are administered during initial training sessions for new Workforce Members and on an annual basis. RGA also provides more detailed training on human rights when needed. Additionally, RGA provides regular and comprehensive anti-harassment training for employees.

## Assessment

RGA is committed to ensuring that violations of human rights, including modern forms of slavery and human trafficking, are not present in either our supply chains or business functions. At this time, RGA's business is conducted primarily with insurance companies. Due to the nature of RGA's business, we are not exposed to high-risk supply chains, and there is a very low risk of slavery and human trafficking occurring. However, we are aware that international business can pose certain risks.

Should RGA become aware that business relationships do not adequately manage their adverse human rights impacts, we will reconsider our supply arrangement and implement remedies available to us. RGA will consider on an individual basis what steps should be taken in relation to our suppliers, and ensure our Workforce Members are aware of the risks and the mitigating factors put in place.

## Reporting Concerns

Workforce Members are expected to avoid contributing to adverse human rights impacts by reporting any suspected breaches of this Policy thoroughly and promptly. RGA will investigate allegations and pursue action to mitigate any adverse human rights impacts. RGA prohibits any form of retaliation against Workforce Members who, in good faith, report a suspected violation of law, rule, regulation, RGA policy, or the Code of Conduct, or who participate in an investigation related to such an alleged violation.

For any questions or to report suspected violations of human rights, Workforce Members can contact one of several channels available to them:

- **Direct Supervisor or Next Level Manager**
- **Local, Regional, or Global Human Resources Representative**
- **RGA Speak-Up Hotline**
- **Global Ethics and Compliance**
- **RGA Legal Counsel**

## Appendix

### Reference Documents

RGA's commitment to human rights is guided by the principles outlined in the laws and regulations of the United States governing human rights, as well as in the following recognized international human rights standards:

- United Nations Universal Declaration of Human Rights
- United Nations Guiding Principles on Business and Human Rights
- International Labor Organization's Declaration on Fundamental Principles and Rights at Work
- International Covenant on Civil and Political Rights
- International Covenant on Economic, Social and Cultural Rights
- Legislation about human rights in the countries where we operate

### Definitions of Terms

**Discrimination** The unfavorable treatment of an individual for reasons that are not due to ability, but are based on a personal characteristic protected by law (e.g., disability, gender, race, religion, age, sexual orientation).

**Harassment** Any words or actions that create an intimidating, hostile, or offensive work environment.

**Human Rights** Human rights are inalienable fundamental rights to which people are inherently entitled simply because they are human beings and which are "inherent in all human beings" regardless of their nation, location, language, religion, ethnic origin, or any other status.

**Human Trafficking** The recruitment, transportation, transfer, harboring, or receipt of persons by improper means (such as force, abduction, or coercion) for an improper purpose including forced labor or sexual exploitation.

**Slavery** Slavery is ownership or control over another's life, coercion, the restriction of movement, and the fact that someone is not free to leave or to change an employer.

**Workforce Member** Any regular or temporary employee, contingent worker, contractor, consultant, or individuals representing or acting on behalf of RGA.

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Global HR Compliance Lead, Global HRBP  
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Global HR Compliance Lead, Global HRBP  
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