

## **Gen Re Modern Slavery Act Statement**

**(May 2023)**

### **Reporting Entities:**

- General Reinsurance Australia Limited
- General Reinsurance Life Australia Limited

As required by the Australian Modern Slavery Act 2018 (the “Act”), this joint statement describes the steps that General Reinsurance Australia Ltd and General Reinsurance Life Australia Ltd (collectively, “Gen Re”) have taken to ensure that slavery and human trafficking is not taking place in any of Gen Re’s supply chains, or in any part of Gen Re’s business.

Gen Re is committed to combatting all forms of modern slavery and carrying out its business in a fair, honest, ethical and open manner. Gen Re is committed to taking steps to ensure that human rights abuses, in any form, do not occur in either its business or supply chains. Neither Gen Re nor, to the best of its knowledge, any supply chains make use of any form of modern slavery.

The statement is provided on behalf of the Reporting Entities and is based on a joint set of policies and procedures applicable to both entities. Relevant business and compliance personnel of both entities have been consulted to assess the design and operational effectiveness of the Gen Re approach to mitigate the risk of modern slavery and human trafficking in the preparation of this statement before it was presented to their boards for approval.<sup>1</sup> Both Reporting Entities do not own or control any other entities.

### **Gen Re business**

A subsidiary of Berkshire Hathaway Inc., General Re Corporation is a holding company that owns General Reinsurance Corporation (located in the USA), which in turn owns General Reinsurance AG (located in Germany). General Reinsurance Australia Ltd is a subsidiary of General Reinsurance Corporation. General Reinsurance Life Australia Ltd is a subsidiary of General Reinsurance AG. As one of the world’s leading reinsurance groups, the Gen Re group of companies transacts international reinsurance business and engages in related operations. It is represented worldwide by a network of more than 40 locations, including General Reinsurance Australia Ltd and General Reinsurance Life Australia Ltd in the Australia and New Zealand markets for non-life and life reinsurance business, respectively.

### **Gen Re supply chain**

Given the nature of Gen Re’s business as a reinsurer of life and non-life insurance companies and their insurance business in a highly regulated Financial Services and labour

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<sup>1</sup> With the exception of the Managing Directors both Reporting Entities have the same Board of Directors who approve the statement.

market, the risk of modern slavery in Gen Re's client and supply chain is very low. Most business operations are performed by internal resources however, some services may be provided by third parties (vendors). Gen Re takes active steps to prevent suppliers of third party services from engaging in modern slavery. Gen Re's vendor governance process includes identifying, analysing, assessing and managing potential risks of vendors and outsourcing partners, including with respect to modern slavery. Where applicable, Gen Re asks third party service providers for assurance with regards to their internal efforts to combat acts of modern slavery.

Gen Re will not support or do business knowingly with a company involved in slavery or human trafficking.

To this end, Gen Re continues to review and develop internal policies and supplier processes across its business to ensure a robust and consistent approach to supply chain risks.

### **Action taken to assess and address risk of modern slavery**

Gen Re continues to review and strengthen its vendor governance process. All new third party service providers are subject to a structured risk assessment process irrespective of the size and duration of their services. All existing service providers are required to be periodically re-assessed with the frequency depending on the outcome of the risk assessment, and all assessments are stored in a central system that helps Gen Re in managing and reporting risks of outsourced service providers. In 2022, Gen Re audited compliance with the process.

Gen Re maintains a Code of Business Conduct, which guides Gen Re employees in fair and ethical business conduct and explains shared responsibilities to its business partners, the public and internally among Gen Re personnel. The Code of Business Conduct is an essential means for achieving the corporate goals. All Gen Re personnel are expected to be familiar with the Code of Business Conduct and receive periodic training regarding the Code of Business Conduct. Every manager is expected to ensure adherence to the Code.

All Gen Re employees are subject to and benefit from employment and compliance policies that limit the risk of modern slavery in the workplace and encourage all staff to work ethically. Gen Re also maintains a Whistleblowing Policy to provide the ability for employees to raise any concerns they have in the workplace and for those concerns to be investigated. A copy of the Whistleblowing Policy may be accessed by contacting the Gen Re Chief Risk Officer.

In consideration of the aforementioned policies and processes, and existing controls to comply with the policies, Gen Re deems the risk of causing modern slavery practices, contributing to modern slavery practices or being linked to modern slavery practices as very low.

### **Periodic review**

Gen Re will conduct an annual review of this statement.

### **Approval by the Board of Directors**

This statement is made in accordance with the Modern Slavery Act 2018 (Cth) and covers the period for the financial year commencing 1 January 2022 and ending 31 December 2022. It has been approved by the Board of Directors of Gen Re on 23 May 2023.



**Neal Mullen**, Managing Director, General Reinsurance Australia Ltd.



**James Louw**, Managing Director, General Reinsurance Life Australia Ltd.

23 May 2023