

# SCOR Group Statement on Slavery and Human Trafficking pursuant to the United Kingdom Modern Slavery Act 2015 and Australia Modern Slavery Act 2018

## Scope

This Statement is made pursuant to Section 54 (1) of the UK's Modern Slavery Act 2015 and Section 14 of the Australian Modern Slavery Act 2018 (collectively the "Act") and constitutes the SCOR Group's ("SCOR") Slavery and Human Trafficking Statement for the financial year ending 31 December 2024.

The Statement covers all insurance and reinsurance regulated entities and their associated service and holding companies within SCOR including, but not limited to, the companies based or operating in the United Kingdom (in particular the Channel Managing Agency Ltd, SCOR UK Company Ltd, Accorde Management Services Ltd, SCOR SE, UK Branch and SCOR Europe SE, UK Branch) and in Australia (in particular, SCOR Global Life Australia Pty Limited and SCOR Reinsurance Asia-Pacific Pte. Ltd., Australian Branch). In order to prepare this joint statement, we consulted and engaged with each of the reporting entities covered by this statement. This Statement has been issued to demonstrate SCOR's commitment to human rights and ethical behaviour.

## **Structure and Organisation**

SCOR is a leading global reinsurer organised around two main businesses, Property and Casualty (re)insurance and Life and Health reinsurance, plus an asset management business, SCOR Investment Partners. The Group is active in (re)insurance markets globally, operating primarily through subsidiaries or branches throughout much of Europe, the Americas and Asia, and in some markets in Africa.

#### **Nature of Our Business**

The reinsurance business is a highly regulated, business-to-business financial services industry. It requires significant capital resources and utilizes a highly skilled and educated workforce. Most aspects of the reinsurance business are performed with SCOR's internal resources, however some aspects of producing, evaluating and managing reinsurance business may be performed by business partners. In particular, these may include (re)insurance brokers, consulting companies or managing general agents/underwriters. In many instances these collaborative business partners are also regulated entities, however they utilize an educated and skilled workforce similar to SCOR. As such, SCOR does not have a "supply chain" in the same manner as a manufacturing or construction entity, nor does it employ manual, seasonal or unskilled labor as a mining, agriculture or domestic services entity may. Nevertheless, SCOR takes these matters very seriously and is committed to preventing slavery and/or human trafficking in conjunction with its business.

## **Policies and Approach**

SCOR has a zero-tolerance approach to all forms of illegal or unethical behaviour, including but not limited to slavery and human trafficking. All SCOR Group companies are required to adhere to these requirements:

SCOR's current policies and approaches to address requirements against such acts within its operations include, but are not limited to:

- SCOR's Code of Conduct establishes a "tone at the top" with the expectation that employees will know and understand the importance of compliance with all laws and regulations, conducting due diligence on business partners, refraining from all forms of bribery and influence peddling, and the proper and ethical treatment of employees so they remain free from all forms of discrimination and any other abusive conduct. These corporate values are reinforced with mandatory trainings.
- The Code of Conduct also includes a Human Rights section which clearly and unambiguously states that SCOR has no tolerance for any form of human abuse, servitude, forced labour, compulsory labour, human trafficking or slavery.
- SCOR's Corporate Social Responsibility approach describes as part of its core values the concept of empowerment of people, which includes professional equality amongst employees.
- SCOR's Compensation framework is designed to be transparent, incentivizing and equitable. SCOR's performance and development programme empowers employees to align their personal goals and behaviours with SCOR's Code of Conduct and Corporate Values. Reward decisions are merit-based and consider performance, skills, experience, qualifications, and potential, ensuring fairness across diverse backgrounds, providing equal opportunities for all employees.
- SCOR is a member of the United Nations Global Compact with its Ten Principles which relate to human rights, labour, environment, and anti-corruption.
- SCOR operates a Policy for Reporting Concerns throughout the Group, which
  encourages staff to report any suspected or actual wrongdoing conduct in violation
  of applicable laws and regulations or in violation of SCOR policies. In order to further
  enhance the opportunity for employees and those outside the company to report a
  concern, SCOR approved the selection and implementation of a web-based
  platform permitting concerns to be reported, both on an identified basis and
  anonymously, via SCOR's internal intranet portal and also on SCOR's external
  website. This platform went live in April 2019.

#### **Our Supply Chain and Due Diligence Process**

We have assessed the slavery risks in our operations, supply chain and third-party partners and as previously described, due to the nature of SCOR's business (including, the business of entities it owns or controls), our workforce and our collaborative business relationships, we have determined that there is a low risk of slavery and human trafficking in our business and in the flow of our business from our clients to us. Other third-party suppliers are largely limited to the provision of business services (e.g. office facilities, information technology, office supplies, etc.), which we have determined continue to present low levels of modern slavery risk notwithstanding that such suppliers may present increased exposure to modern slavery risks associated with certain countries, industries and workforces. Since 2022, an external platform is used in its headquarters to provide Know-Your-Supplier information as well as information on compliance standards of suppliers and services providers.

As a control, SCOR implements a Group Outsourcing Policy which sets out the minimum information requirements needed when entering a material outsourcing arrangement. Within the Policy there is a requirement that each Outsourced Agreement contains a provision that the Service Provider confirms that they comply with all applicable laws and regulations. Additionally, there is an Outsourcing Due Diligence Questionnaire as an appendix to the Group Outsourcing Guidelines that specifically notes: (1) whether the service provider will abide by SCOR's Code of Conduct; and (2) whether the service provider has policies covering anti-bribery and reporting concerns/whistleblowing. Efficiency of these processes are monitored

within the Internal Control System. In addition, a Guideline on Corporate Social Responsibility clauses has been released in 2021 to encourage adherence and compliance by our counterparties to SCOR Sustainable Development Charter principles in non-reinsurance related contracts, based on materiality. Effective implementation is supported by the Legal Department.

## **Assessing Effectiveness**

SCOR (including the UK and Australian entities) reviews and assesses on an ongoing basis the effectiveness of implemented actions to identify and address Modern Slavery risks in our operations. This review is an ongoing and evolving process.

## **Training and awareness**

All SCOR employees have to complete periodic mandatory compliance trainings and are made aware of the SCOR Code of Conduct.

#### Governance

This Statement has been reviewed and approved by the senior management of SCOR Global Life Australia and SCOR Reinsurance Asia-Pacific Australian Branch. It is reviewed annually and updated as required.

### **Approval**

This Statement was approved by the Board of Directors of SCOR SE on 6 May 2025.

This Statement was approved by the Board of Directors of SCOR Global Life Australia Pty Ltd (ACN 148 897 670), in their capacity as principal governing body of SCOR Global life Australia Pty Ltd on 11 June 2025 and Paula Bourke is authorised to sign this statement as the CEO of this entity.

This statement was approved by the Senior Officer Outside of Australia ("SOOA") of SCOR Reinsurance Asia-Pacific Pte. Ltd. Australian Branch (ARBN 071 103 092) in their capacity as principal governing body of SCOR Reinsurance Asia-Pacific Pte. Ltd. Australian Branch on 13 June 2025.

Paula BOURKE (Jun 16, 2025 11:18 GMT+10)

Paula Bourke CEO SCOR Global Life Australia Pty Limited Mukul KISHORE (Jun 16, 2025 09:51 GMT+8)

Mukul Kishore SOOA SCOR Reinsurance Asia Pacific Pte Ltd - Australian Branch