



Reinsurance Group of America, Incorporated®

Modern Slavery and Human Trafficking Statement

Introduction

At Reinsurance Group of America Incorporated ("RGA"), we pride ourselves for our continuing dedication to conducting our global business fairly and ethically. We follow a strict equality and fairness ethos and do not tolerate modern slavery or human trafficking.

This statement is also provided on behalf of subsidiaries of RGA including:

- RGA Reinsurance Company of Australia Limited ("RGAA"); and
- RGA International Reinsurance Company dac, RGA UK Services Limited (together "RGA UK").

Our business

RGA, a Fortune 500 company, is among the leading global providers of life reinsurance and financial solutions, with approximately \$3.4 trillion of life reinsurance in force and assets of \$75.7 billion as of March 31, 2020. Founded in 1973, RGA today 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, and financial solutions.

Our policies

Code of Conduct

RGA adheres to the highest ethical standards in all our business dealings. We follow stringent compliance procedures and the conduct of our workforce members is governed by our Code of Conduct.

The Code serves as a guideline for ethical business conduct by RGA workforce members. A core value is integrity, and its guiding principles are honesty, fairness, trustworthiness, obeying laws and regulations, and reporting concerns about compliance. It follows that RGA is committed to preventing slavery and human trafficking in its activities and supply chains.

Our workforce members are required to certify they have read and agree to abide by the Code as part of their training when they join, and then on an annual basis. Failure of any workforce member to comply with the Code may result in disciplinary measures up to and including termination.

Speak-Up Policy

Our Speak-Up Policy in RGA's Employee Handbook ensures RGA adheres to the highest ethical standards in all its business dealings by encouraging our workforce members to report any violation of law, rule, regulation, RGA policy, or RGA's Code of Conduct either online, by phone or by email.

Vendor Risk Management Policy

Our Vendor Risk Management Policy provides accountability within RGA and a formal process for carrying out vendor due diligence and escalating high-risk findings. RGA expects our vendors to follow RGA's high standards and conduct their business in an ethical manner.

Human Rights Policy

Our Human Rights Policy details the expectations for RGA's actions and behaviours concerning human rights and applies globally to RGA's workforce. RGA provides training on the standards and principles within the Human Rights Policy and more detailed training on human rights when needed.

The Code of Conduct, Speak-Up, Vendor Risk Management, and Human Rights Policies are all kept under review and are accessible to RGA Workforce members on our intranet.

Our assessment

RGA UK and RGAA's business is conducted primarily with insurance companies. Due to the nature of RGA UK and RGAA's business we are not exposed to high-risk supply chains and there is a very low risk of slavery and human trafficking occurring in this supply chain.

During 2019, RGA UK and RGAA engaged a number of suppliers including professional associations, consulting services (accounting and legal services), investment management services, building expenses and maintenance (utilities, rent, equipment maintenance, building repairs, janitorial expenses), professional education, desktop tools (phone, computers, printers, software, other supplies), miscellaneous employee appreciation expenses, record/data storage, books and periodicals, and miscellaneous freight and postage.

RGA UK and RGAA are not aware of any risk of modern slavery or human trafficking in respect of the above suppliers. However, to further mitigate against any potential risks, from 1 July 2020 onwards RGA UK and RGAA will request that all new and renewing suppliers agree to include a clause in contracts with RGA UK and RGAA requiring those suppliers to take reasonable measures to ensure that modern slavery and human trafficking practices do not occur in their supply chains.

This statement is made pursuant to Section 54(1) of the Modern Slavery Act 2015 (UK) and the Modern Slavery Act 2018 (Australia).

This statement has been prepared as a result of consultation between RGA UK, RGAA, the Director of Procurement, Corporate Treasury & Accounts and the Executive Director, Third Party Risk Oversight. As part of that consultation, the effectiveness of actions to assess and address the risks of modern slavery and human trafficking practices in RGA's operations and supply chains were discussed. For 2019, it was agreed that no additional actions are required. This constitutes RGA's anti-slavery and human trafficking statement for the financial year ending 31 December 2019.

Signed



Gay Burns
Executive Vice President and Chief Human Resources Officer
Reinsurance Group of America, Incorporated

Signed

A handwritten signature in dark ink, appearing to read 'M Stewart', with a large, sweeping flourish at the end.

Mark Stewart
Managing Director
RGA Reinsurance Company of Australia Limited

This statement was approved by the Board of RGAA on 7 May 2020.

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