

# Group Human Rights Policy

## RSA Human Rights Policy

RSA is a leading international general insurer with core markets in the UK, Ireland and the Middle East, Scandinavia and Canada. In all of our regions, we are committed to developing trusted consumer and commercial brands that deliver great service and relevant products to our customers.

We are driven to help individuals and businesses to manage their risks well, and to support them to recover if things don't go as planned. In a world where our people, customers and communities are continually facing new challenges, we are committed to managing our business operations sustainably, reducing our impact on the environment and having a positive impact on the communities we work in.

### Protecting human rights

Everyone has the right to be treated with fairness, respect and dignity. We recognise that business has an important role to play in understanding and managing risks to human rights that can result from business activities and relationships, in all parts of the value chain.

RSA is committed to having a positive social impact by supporting and respecting internationally proclaimed Human Rights. We support the principles of Human Rights set out in the Universal Declaration of Human Rights (UDHR), the International Labour Organization's (ILO) Declaration on Fundamental Principles and Rights at Work and are a signatory to the United Nations Global Compact.

This policy provides a framework for RSA's business activities to be conducted in a way that respects global Human Rights standards and applicable legislation. In developing our policy we are guided by a wide range of international standards including the UN Guiding Principles on Business and Human Rights.

#### *Why do we have a human rights policy?*

As an insurance company we play a vital role in the lives of our customers and in the broader economy. Operating our business in an ethical way is fundamental to how we operate and our stakeholders' expectations. We aim to continually improve our approach and promote an open, transparent culture that expects and empowers our people to do the right thing, for our customers, colleagues and the communities we are a part of.

As a signatory to the United Nations (UN) Global Compact, we commit to embed the ten UN principles on human rights, labour, the environment and anti-corruption within our operations. Consideration of Human Rights are embedded throughout our corporate responsibility strategy, *Confident Futures*, and our policies and processes are critical to upholding high standards across our business. Oversight is provided by our ESG (Environmental, Social, Governance) Committee which monitors implementation of the policy.

### Our commitments

Through the commitments set out in this Human Rights Policy we are able to effectively manage our business activities so that they are conducted in a way that respects internationally agreed Human Rights.

*RSA respects and supports the following principles and expects our partners to do the same:*

- *The right to equal opportunity and non-discriminatory treatment* – We believe we have a responsibility to create a culture and working conditions that help our people to achieve their full potential regardless of race, ethnicity, nationality, religion, age, gender (or maternity), sexual orientation, disability or marital status.
- *The right to security of person* – We believe all employees should have the right to feel safe and secure, and not subject to violence, cruelty or inhumane treatment.

- *The right to privacy* – We recognise the importance of employee and customer data and understand the responsibilities we have to protect it.
- *The right of children and the effective abolition of child labour* – We believe it's never acceptable to use child labour in our own operations, or those of our partners.
- *The rights to freedom of association and collective bargaining* – We recognise the role of collective bargaining and trade unions to protect employees' interests and ensure fair employment terms, to the extent we are able to under national law.
- *The elimination of forced or compulsory labour (including slavery, servitude and persons who have been trafficked)* – We believe it's never acceptable to use forced or bonded labour, to deprive employees of identity papers or force them to make payments in order to receive employment in our own operations, or those of our partners.
- *The right to a safe and healthy workplace* – We provide our people with information, guidance, tools and training to look after their physical and mental wellbeing.
- *The right to payment of a fair wage and working hours* – We believe everyone has a right to equal pay for equal work, reasonable limitation of working hours and holidays with pay.
- *Prohibition of bribes* – Bribery and corruption can have a disproportionately negative impact on human rights, in line with RSA's anti-bribery and corruption policy we have a zero-tolerance approach to payment of bribes.
- *Avoiding the use of the company's services and products to abuse human rights* – We aim to ensure that our products and services are not used by others in a way that is inconsistent with our commitment to international human rights standards.

In some countries where we operate national law and international human rights standards differ. Where there is a conflict, we will apply national law, while seeking to fulfil our commitment to respect human rights to the fullest extent possible.

## Achieving our commitments

In support of the commitments we've set out, we take the following actions:

- Ensure that appropriate human resources policies and procedures are in place to enable Human Rights principles to be upheld and that employees are treated fairly and respectfully.
- Raise awareness of our policies and principles amongst our employees, suppliers and business partners, so they understand their responsibilities - especially those in human resources, procurement and underwriting roles.
- Empower our employees, suppliers and partners to raise concerns confidentially through our grievance mechanisms or independent whistleblowing site, Ethicspoint, if they feel Human Rights principles are not being upheld.
- Implement due diligence processes to identify, assess, prevent and mitigate any Human Rights impacts associated with RSA's operations, and develop methods to monitor and track the effectiveness of our response.
- Embed the principles through our procurement actions, including through supplier questionnaires and monitoring, following a risk-based approach.
- Require suppliers to operate in accordance with our Supplier Code of Conduct and in compliance with regulations in the geographies in which they operate.
- Regularly review the social and economic climate of countries where we do business in order to manage our investments and underwriting activities in line with international Human Rights principles.
- Engage in dialogue with our business partners, including brokers and joint venture partners, to share our values and promote the benefits of addressing Environmental Social and Governance (ESG) issues.
- Adopt a zero-tolerance approach to payment of bribes.

- Report publicly on the policies, processes and actions we take to embed Human Rights principles across the organisation in line with legislative requirements and voluntary standards, through our Annual Report and Accounts, Corporate Responsibility report and company website.

## Our suppliers and business partners

We aim to work with suppliers whose policies and practices are consistent with our own principles-based approach to Human Rights and recognise our responsibility to influence suppliers positively. Our commitment to Human Rights is an important consideration for our procurement teams when assessing third party contracts, suppliers and their supply chains.

We also require our suppliers to operate in accordance with our 'Supplier Code of Conduct' and in full compliance with all regulations within the geographies in which they operate. The Supplier Code of Conduct encourages the highest standards of ethical conduct by:

- Affirming their commitment to not violate Human Rights and conduct their operations in line with international standards.
- Requiring suppliers to evidence how they uphold the principles of Human Rights in their own supply chain and through their approved sub-contractors and wider supply chain.

We expect our business partners, including brokers and joint venture partners, to commit to upholding our commitment to Human Rights through their operations and supply chain.

## Scope

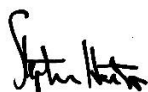
This Policy applies to all RSA operations, including wholly or majority owned subsidiaries and associated companies where RSA has management control.

## Further information

For more information see:

- RSA's Confident Futures strategy  
<https://www.rsagroup.com/responsibility/our-strategy/>
- Supplier Code of Conduct  
[https://www.rsagroup.com/media/2021/rsa\\_supplier\\_code\\_of\\_conduct\\_final.pdf](https://www.rsagroup.com/media/2021/rsa_supplier_code_of_conduct_final.pdf)
- Modern Slavery and Human Trafficking Statement  
<https://www.rsagroup.com/responsibility/disclosures/>
- Focus on: Business Integrity  
<https://www.rsagroup.com/responsibility/managing-the-everyday-well/business-integrity/>

## Approval

A handwritten signature in black ink, appearing to read 'Stephen Hester'.

Stephen Hester  
Group Chief Executive

Date: January 2021

*This policy will be reviewed annually, or more frequently in the case of significant legislative or organisational changes.*