



SwissLife
Global Solutions

Code of Conduct
for Business Partners
of Swiss Life Global Solutions

Code of Conduct

As a responsible life insurance actor, Swiss Life Global Solutions expects, within the framework of its relationships with its business partners, the implementation and application of its environmental, social, and governance (ESG) standards and the promotion of its values.

This Code of Conduct is a way for Swiss Life Global Solutions to build trust and respectful relationships with its current or future business partners and to share responsible practices. Adhering to this Code of Conduct entails applying the principles set out and, where applicable, taking corrective action on the bases of a continuous improvement approach.

Swiss Life Global Solutions expects its business partners to base their actions on certain basic principles and consider the environmental and social factors in their businesses. The latter covers social and employee, respect for human rights, anti-corruption, and anti-bribery matters. The focus is set on human and labour right. Furthermore, we expect that our business partners have sound governance standards.

We expect that our business partners comply with all national laws and regulations that are applicable to their businesses and observe the international conventions and resolutions such as the Universal Declaration of Human Rights, UN Guiding Principles on Business and Human Rights, OECD Guidelines for Multinational Enterprises, the Children's Rights and Business Principles from UNICEF, UN Global Compact and our own internal standards, as outlined hereinafter and as amended from time to time.

Code of Conduct

for Business Partners

4 *Purpose and scope*

5 *Expectations of our business partners*

6 *Governance*

7 *Administration*

8 *Acceptance of the Code of Conduct*

Purpose and scope

This Code of Conduct sets out our minimum standards and expectations in relation to responsible business practices and ESG.

We expect our business partners to conduct their business activities in accordance with the minimum standards set out in this Code of Conduct and to maintain and enforce policies that support the implementation of these.

Business partners are expected to clearly outline their ESG commitments in their policies and processes and to communicate this to their own business partners. Swiss Life Global Solutions can request evidence of this before signing a contract or at point during the contractual relationship.

This policy applies to the business partners of Swiss Life Global Solutions. As our business partners, we view the suppliers, service providers, contractors and subcontractors providing goods and services to Swiss Life Global Solutions, or on behalf of Swiss Life Global Solutions.

These can cover the contracts that we enter into to maintain our daily business activities as well as the contracts that we sign as part of our recurring activities. For the minimum ESG expectations of our suppliers, please refer to Supplier Code of Conduct: Minimum ESG expectations of third-party suppliers.

This Code of Conduct is not exhaustive, and an individual contract signed with a business partner may include different standards and provisions. In case of a conflict between this Code of Conduct and the individual contract with a business partner, the terms of the latter prevail.



Expectations of our business partners

Swiss Life Global Solutions is committed to ensuring that we work with business partners that are aligned with our ESG ambitions.

We identify the following focus areas as our ESG priority. These focus areas, form the building blocks of our ESG ambitions that is implemented at each relationship that we build with our business partners:



Environment

Swiss Life Global Solutions is committed to reducing its environmental impact in a responsible way, using our influence to contribute to environmental sustainability.

We expect our business partners to take proactive steps to minimise their own environmental impact and to engage with their own supply chain. This can include (but is not limited to):

- **Minimising energy consumption and greenhouse gas emissions**
- **Minimising resource consumption**, through sustainable operations, sustainable materials sourcing and careful waste management
- **Purchasing energy from renewable sources** where possible



Human rights

Swiss Life Global Solutions respects the internationally recognised rights set out in the UN Guiding Principles on Business and Human Rights (UNGPs). We adhere to:

- The International Bill of Human Rights
- The core standards and principles of the International Labour Organisation (ILO), including the Convention on Discrimination (No. 111) and the Convention on the minimum age for the effective abolition of child labour (No. 138) and the Convention on Prohibition and Immediate Action to Eliminate the Worst Forms of Child Labour (No. 182).
- As a signatory to the UN Global Compact, Swiss Life Global Solutions makes an annual public commitment to respect and support human rights and comply with the ten principles of the United Nations Global Compact (UNGC).
- Additionally, Swiss Life Global Solutions adheres to international general and sector-specific standards, such as the Principles for Responsible Investment (PRI) and the Principles for Sustainable Insurance (PSI)

Swiss Life Group's Declaration of Respect for Human Rights is applicable to all entities of the Group, including Swiss Life Global Solutions, and can be accessed on Swiss Life Group's website.

We expect our business partners to collaborate with us to ensure the application of the OECD Guidelines for Multinational Enterprises, the UN Guiding Principles on Business and Human Rights, including principles and rights set out in the eight fundamental conventions identified in the Declaration of the International Labour Organisation on Fundamental Principles and Rights at Work and the International Bill of Human Rights.



Anti-slavery and human trafficking

Swiss Life Global Solutions strictly prohibits the use of modern slavery and human trafficking in our operations and supply chain. We have a zero-tolerance approach to modern slavery.

The prevention, detection and reporting of modern slavery in any part of our organisation or supply chain is the responsibility of all those working for us or under our control. We expect our business partners to operate a zero-tolerance approach to modern slavery.



Anti-bribery and corruption

Business partners shall not, directly or indirectly, accept, offer, promise, give, or demand a bribe or other undue advantage to obtain or retain business or other improper advantage. Business partners shall also resist the solicitation of bribes and extortion.

In order to meet this expectation, business partners shall develop and adopt adequate internal controls, ethics and compliance programmes, or measures for preventing and detecting bribery, developed on the basis of a risk assessment addressing the individual circumstances of an enterprise, in particular the bribery risks facing the business (such as its geographical and industrial sector of operation). This should be tailored and proportionate to the size of the business and industry of operation.



Diversity and inclusion

We believe that we have an obligation to undertake business activities that will have a positive impact on the people who live, work and invest in our assets. We aim to foster an inclusive working culture and have a zero-tolerance approach to discrimination of any form.

All business partners are expected to practice a zero-tolerance approach to any form of discrimination within their business operations and hiring and recruitment practices.



Compliance

All business partners are required to comply with all applicable legislation (including environmental and equality legislation) to the country within which they operate.

We encourage our business partners to go beyond minimum compliance expectations with regards to ESG and responsible business practices.



Occupational health and safety

Swiss Life Global Solutions expects its business partners to strive for a high level of occupational health and safety implementation by adopting an approach that is appropriate to their business.

All business partners are expected to abide by all applicable local laws relating to health and safety and ensure a safe and healthy working environment in order to preserve the health of employees, protect third parties, and prevent accidents, injuries, and work-related illness.



Fair competition

Business partners shall carry out their business activities in a manner consistent with all applicable competition laws and regulations, taking into account the competition laws of all jurisdictions in which the activities may have anti-competitive effects and refrain from entering into or carrying out anti-competitive agreements among competitors.

In order to meet this expectation business partners shall regularly promote employee awareness of the importance of compliance with all applicable competition laws and regulations, and, in particular, train senior management of the business in relation to competition issues. This should be tailored and proportionate to the size of the business and industry of operation.



Taxation

Business partners are aware of and comply with the tax laws and regulations of the countries in which they operate.

Business partners shall treat tax governance and tax compliance as important elements of their oversight and broader risk management systems and adopt tax risk management strategies to ensure that the financial, regulatory and reputational risks associated with taxation are fully identified and evaluated.



AML and Terrorist Financing

Swiss Life Global Solutions is committed to assist in the combat against money laundering and terrorist financing. Business partners shall comply with all applicable anti-money laundering laws and regulations.

They shall keep financial records and prepare reports in accordance with international laws and regulations.



Sanctions and Embargos

Business partners shall comply with all applicable trade and import regulations, including sanctions and embargoes, applicable to its operations.



Conflict of interest

Business partners shall disclose any situation that may be identified as constituting a conflict of interest. A conflict of interest arises when a person has a private/personal interest that could influence their decisions. Such conflicts of interest include kinship or affinity, partnership, business partnership or investment.



Remuneration and working hours

Business partners shall comply with all applicable national laws and mandatory industry standards on working hours, overtime, wages, and benefits. They shall pay workers promptly and communicate to workers the basis on which workers are paid in an understandable and clear manner.

Deductions from wages and salaries as a disciplinary measure are not permitted unless they are legally permissible.



Data protection

Business partners shall comply with applicable data protection and security laws and regulations. This, in particular, applies to personal data of customers, consumers, employees, and shareholders. They shall comply with all such requirements when collecting, processing, transferring, or using personal data.

Business partners shall protect confidential information and use it only in an appropriate manner. This means that the business partners do not disclose information that is not known to the public.



Anti-retaliation

Business partners shall prohibit retaliation against their employees who report inappropriate or non-compliant work practices. The confidentiality of the whistle blower's identity and the information provided shall be ensured.

Business partners are aware of being evaluated by Swiss Life Global Solutions or a third party commissioned by Swiss Life Global Solutions, based on the minimum standards set out above.



Governance

New business partners:

Signature of the Code of Conduct is a requirement for all new business partners.

This can be confirmed by signing the Code of Conduct or by providing confirmation via email.

This Code of Conduct should be signed by the most senior team member who can engage the company.

Existing business partners:

For existing or ongoing engagements, the Code of Conduct should be signed/accepted latest at the next update of the contract.

Administration

This Code of Conduct will be reviewed annually to reflect any changes in law and regulations.



Acceptance of the Code of Conduct

By entering into a contractual arrangement for delivery of goods and services for or on behalf of Swiss Life Global Solutions, I hereby confirm my acceptance of the expectations set out in this Code of Conduct.

Name

Title

Organisation

Plate/Date

Signature

*We enable people to lead a
financially self-determined life.*