

Zurich Norway Transparency Act.

This statement has been published in accordance with the Norwegian Act relating to enterprises' transparency and work on fundamental human rights and decent working condition (Transparency Act) came into effect July 1st 2022.

This statement continues to apply until any amendments are required and is subject to an annual review each year. The boards of the relevant Nordic entities approved this statement 30.06.2023.

Introduction

Zurich Norway opposes modern slavery and human trafficking in all its forms, and do not tolerate it within our business or within our supply chain.

Our commitment to respect human rights is part of our Group's Code of Conduct, which all Zurich employees are committed to following. Zurich Norway respects the protection of international human rights within our sphere of influence and work hard to avoid being complicit in human rights abuses.

Zurich became a signatory to the United Nations Global Compact in 2011 ([Zurich Insurance Group | UN Global Compact](#)), which means we are committed to aligning our strategy, culture, and day-to-day operations with the Global Compact's ten universally accepted principles in the areas of human rights, labour, environment, and anti-corruption. Six of the ten UN Global Compact principles relate to human rights and Principle 4 specifically commits us to the elimination of all forms of forced and compulsory labour.

Organisational structure and supply chains

Zurich is a leading multi-line insurer that serves its customers in global and local markets. With 54,000 employees, it provides a wide range of property and casualty, life insurance products and services in more than 210 countries and territories. Zurich's customers include individuals, small businesses, and mid-sized and large companies, as well as multinational corporations. The Group is headquartered in Zurich, Switzerland, where it was founded in 1872. Further information about Zurich is available at www.zurich.com.

Zurich in Norway provides a suite of general insurance products to corporate customers. Zurich Norway supplies business, commercial insurance through a number of distribution and direct channels.

Zurich operates in a global sourcing environment and aims to work with suppliers who share our values. Zurich expect high standards of business conduct from those who represent us or do business with us. In June 2021, Zurich published a Supplier Code of Conduct which sets clear environmental, social, and ethical expectations for our suppliers, globally. This includes an expectation that our suppliers respect human rights and operate

labour standards that meet the relevant Principles of the UN Global Compact and the eight International Labour Organization (ILO) conventions considered fundamental to the rights of human beings at work.

Policies in relation to slavery and human trafficking

The following Zurich policies support our commitment to working to influence and mitigate the risk of modern slavery in our organisation and supply chain:

- **Zurich Code of Conduct** - sets out our purpose and values and the minimum standards of conduct expected from all Zurich employees. All decisions should be guided not only by applicable laws and regulations and internal guidelines, but also by what is the right thing to do. You can find out more about the Zurich Code of Conduct on our website [here](#).
- **Corporate Responsibility and Sustainability Strategy** - aims to create a positive impact through leveraging our different roles in society – as an insurer, an investor, an employer and in communities. You can find more information about the Zurich's commitment to Corporate Responsibility and Sustainability [here](#).
- **Sustainable Sourcing Program** - Zurich are continually working to improve processes and guidelines for managing sustainability issues in the supply chain and have established a Sustainable Sourcing program in order to establish the necessary governance and allocate the required resources to our efforts. Our Sustainable Sourcing program has three core pillars that address environmental, social and ethical factors. The key objective of the program is to embed these factors throughout the sourcing lifecycle.
- **Reporting on Improper Conduct and Concerns Policy** - Zurich is committed to an environment where employees feel comfortable to share their views and raise their concerns. Zurich encourage employees to speak up promptly and report conduct that they believe violates laws, regulations, internal policies, or the Code of Conduct.

Due diligence processes

Our recruitment process ensures that Zurich Norway only recruit employees in a fair, lawful, and professional manner, with robust checks completed throughout the on-boarding journey to ensure Zurich Norway do not employ individuals that are facing or involved in, enforced servitude.

Our established procurement process supports the on-boarding of suppliers, which includes a rigorous due diligence process. This process includes using data to assess potential financial, legal, and regulatory exposures. It gives risk-based insight (based on criticality of services and risk profile) into the supplier's structure, operations, culture, human resources, and future outlook.

A risk-based assurance process is in place, which is undertaken throughout the supplier lifecycle to ensure effective and efficient ongoing oversight of our suppliers. The process considers legal and regulatory requirements applicable to outsourcing and supplier management as well as Zurich's internal policies.

Human Right Risk assessment

Financial Services itself is not a sector that is considered high risk by the International Labour Organisation (ILO). Therefore, the risk of Zurich in the Norway directly employing staff in enforced servitude is low, due to the nature of our business and the robust controls that we have in place.

On an annual basis a review of the risk of modern slavery within the 1st tier of our supply chain (e.g., those suppliers that Zurich are directly contracting with to provide Zurich in the Norway with goods or services). Zurich Norway use criteria to risk assess our suppliers based on both Human right country list and service/good. In 2023 this exercise identified the majority of Zurich Norway's suppliers are considered low risk, due to the nature of the services provided and the location from which those services are provided.

Training on modern slavery and human trafficking

Zurich's Code of Conduct is built around the recognition that everything we do is in accordance with the highest ethical, legal, and professional standards. Our annual Code of Conduct training is completed by all Zurich staff and includes content around:

- fair and compliant conduct
- the protection of human rights and
- reporting concerns

Key performance indicators to measure effectiveness of steps being taken

Monitoring of concerns reported through Zurich's confidential portal has demonstrated that during 2021 no suspected or confirmed instances of modern slavery were identified within our business or supply chain.

Further Steps

Zurich Norway will continue to review our internal policies, processes, training, and support materials to ensure they are appropriate, meet statutory requirements, industry best practice and our Group Code of Conduct.

Signed



Elisabet Aagot

CEO, Zurich Insurance plc, Norway Branch