

## Great Lakes Insurance SE Statement on the UK Modern Slavery Act 2015

This statement is made pursuant to section 54 (1) of the UK Modern Slavery Act 2015 and constitutes Great Lakes Insurance SE's slavery and human trafficking statement for the financial year ending 31 December 2023.

Great Lakes Insurance SE (GLISE) is a fully owned subsidiary of Munich Re<sup>1</sup> and is a specialist provider of insurance services to a number of entities in the Munich Re group. As GLISE supplies services within the United Kingdom (UK), it must provide a statement of steps taken to combat slavery and human trafficking during the financial year.

Where relevant, the references in this statement to Munich Re are also reference to GLISE. Munich Re standards are explained in Munich Re's statement on the UK Modern Slavery Act, which is published on its public website.

### GLISE's structure, its business and its supply chains

GLISE is a provider of speciality insurance solutions powered by Munich Re, conducting Agency, Coinsurance and Single Risk Business on a global scale. GLISE operate according to two distinct models: delegated acceptances via agency or coinsurance agreements and individual underwriting of large industrial risks.

### GLISE's policies in relation to slavery and human trafficking

The Munich Re business concept of sustainable and responsible action is adopted, so GLISE are committed to combat slavery and human trafficking. A suite of policies, specific to our risks and controls, are in operation to set out and maintain business standards, which are integral in preventing modern slavery or human trafficking.

Specifically, the Munich Re Supplier Code of Conduct adopted in January 2023 (with ESG aspects) is aligned with our business and operational activities and the Munich Re group internal Code of Conduct.

### GLISE's due diligence processes in relation to slavery and human trafficking in its business and supply chains

Munich Re has developed a process that covers key components of human-rights due diligence. Additionally, GLISE has local processes that reduce the risk of modern slavery and human trafficking.

### GLISE's assessment and measures to manage slavery and human trafficking risks

GLISE continually keeps under review where its business may be at risk of encountering modern slavery or human trafficking, and has taken steps to assess and manage that risk as follows:

#### GLISE Employees

All GLISE employees contribute to our success through their skills, performance and dedication. That is why we are committed to investing in their development and providing all staff with equitable opportunities and excellent working conditions.

GLISE is aware that poor recruitment procedures and working environments can lead to instances of compulsory labour or servitude, if left unchecked.

Our Human Resources (HR) function undertake employment screening checks which include residency and right to work status to ensure the legitimacy of our employees right to work in the UK. They also operate wage structures and working hour models that meet legal requirements and market standards, which are monitored through remuneration benchmarking exercises on an annual basis. Any additional employment or hours worked are subject to sign-off procedures and monitored to prevent any environment that would facilitate an offence.

HR have taken part in initiatives to achieve optimal working conditions for employees, with reviews of equitable opportunities and health and safety related topics. The working conditions are measured using 'continuous conversations' and feedback obtained through hybrid working check-ins, new joiner surveys and, occasionally, exit interviews with employees under notice.

Employees have the opportunity to report concerns or compliance breaches through various mediums; robust whistleblowing channels are in place that allow any incidents to be raised securely, confidentially and, on request, anonymously. Appropriate whistleblowing awareness training has been undertaken for existing staff and is now standard practice for new joiners.

<sup>1</sup> Munich Re (Münchener Rückversicherungs-Gesellschaft Aktiengesellschaft in München)

## GLISE Diversity Equity & Inclusion

Munich Re launched its Diversity, Equity & Inclusion (DEI) strategy in January 2023. The DEI team's key responsibility has been to build and communicate the DEI strategy with the aim of growing a forward-thinking, progressive environment of inclusion. GLISE aims to build a culture of belonging across the organisation so all employees are comfortable being themselves at work and are able to work positively and efficiently.

## GLISE Procurement

GLISE are conscious that we are part of a wider picture as we engage with a number of suppliers. GLISE recognise the different risk profiles of suppliers in regard to them potentially drawing benefit from modern slavery or human trafficking.

Like Munich Re, GLISE implements a Corporate Responsibility clause into procurement contracts and reserves the right to cancel the contractual relationship for any breach. Suppliers must have processes in place that allow the timely remediation of any deficiencies or non-compliance with the Supplier Code of Conduct, as identified by Munich Re.

GLISE's procurement function only engages with reputable suppliers, who largely trade in low-risk goods, like professional services, software and office supplies. We have an active tender process that is periodically reviewed at contract renewal, where a supplier's ethics and risk of modern slavery and human trafficking offences are part of GLISE's overall consideration to conduct business. Our Procurement function operates a risk-based approach, which is influenced by factors like the services, goods, and operational territories of the suppliers, to determine the level of due diligence applied.

## GLISE (Re)Insurance Business

GLISE operate an agency model for accessing insurance business but recognise delegated authority can present greater risk due to the operational separation of such arrangements.

GLISE include contractual obligations on agents to not commit any criminal activity. It also expressly instructs agents to exercise care and skill in sub-delegating or performing their duties. The need for personnel to have professional qualification and experience is part of this duty, which is accepted to reduce the likelihood of working conditions that could constitute an offence.

Our Agency function conduct due diligence when onboarding (re)insurance business and any concerns around modern slavery or human trafficking are escalated. GLISE's dedicated Agency Audit function also include the topic of Modern Slavery to the scope of audits and continue to assess agents Modern Slavery Statements adequacy, resolving any identified issues.

## GLISE's training in relation to slavery and human trafficking

All GLISE staff are required to complete training on the Munich Re Group Code of Conduct on an ongoing basis to ensure they are familiar with the standards of ethical conduct and are aware of the need to observe these rules day to day. This training includes, for example, reporting of infringements, data protection and corruption. Staff identified as having a need for enhanced knowledge of the risk of modern slavery in their roles receive specific training every two years.

## Progress in the financial year 2023

Hybrid Working: Hybrid working is now the normal working pattern across GLISE with a blend of remote and office working fully embedded in our culture. This continues to support wellbeing and assists with work-life balance, staff caring responsibilities and childcare. During 2023, the number of employees requesting and now working part-time hours has increased.

Employees: As well as embedding the hybrid working policy, HR have continued to run managing/working with respect workshops during 2023. The course material focuses on each staff member's own behaviour and the impact on the workplace environment and psychological safety. In addition, the DEI team have launched DEI 101 and Inclusive Mindset training for all managers and employees, positioning inclusive mindset as a core competency in the company.

Procurement: A core model for digital supplier management went live at Munich Re's headquarters in Munich in 2020 and has been rolled out in stages across the group. During 2023, GLISE continued to make good progress in adopting additional features with full implementation due in 2024. This will enable GLISE to further support the full acceptance and documentation of the UN Global Compact Principles (UNGC) throughout its procurement supply base. The Munich Regroup-wide Supplier Code of Conduct went live and was adopted by GLISE in January 2023. Through use of the global core model and the associated standardised supplier onboarding/contracting process, UNGC coverage is expected to increase.

## Final Remark

We will continue to consider human and labour rights aspects throughout Munich Re and to consider our obligations under the UK Modern Slavery Act 2015.

Signed by order of Great Lakes Insurance SE Board of Management:

## Christoph Carus


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Position: Chief Executive Officer (CEO)

Company: Great Lakes Insurance SE

Date: 30<sup>th</sup> June 2024

**Signature:** 

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