

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 2020.

Great Lakes Insurance SE (GLISE) is a fully owned subsidiary of Munich Re¹ and acts as a specialist provider of insurances services and the preferred facilitator of insurance business. 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.

Any references in this statement to 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 shares our knowledge and framework for bespoke primary insurance solutions and maintain reinsurance agreements with Munich Re business units. We underwrite retail and commercial (re)insurance business using our worldwide insurance licenses to develop and support innovative opportunities in partnership with Munich Re.

GLISE contributes to the overall premium income by circa €5 billion and employs or engages 182 employees.

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

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 diminish the risk of modern slavery and human trafficking (these are explained in the assessment

and measures to manage related risks below).

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

GLISE has assessed its own risks and controls associated to the four human rights dimensions set out by Munich Re. It identified that the (re)insurance industry is less exposed to the risk of modern slavery or human trafficking being facilitated than other service sectors, but recognised the following:

GLISE Employees

GLISE are aware that poor recruitment procedures and working environments can lead to instances of compulsory labour or servitude, if left unchecked. Our Human Resources function use pre-employment residency checking to ensure the legitimacy of our employees working statuses in the UK. They also operate wage structures and working hour models that meet legal requirement and market standards, which have been monitored through remuneration benchmarking

¹ Munich Re (Münchener Rückversicherungs-Gesellschaft Aktiengesellschaft in München)

exercises on an annual basis. Any additional employment or hours worked are subject to sign-off procedures and also 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 equal opportunities and health and safety related topics. The working conditions are measured by the use of 'continuous conversations' feedback and exit interviews with current and former employees.

GLISE Procurement

GLISE are conscious that we are part of a wider picture as we engage 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 all our procurement contracts and reserves the right to cancel by way of extraordinary termination for good cause. Our 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 likeliness 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. Our dedicated Agency Audit function also include the topic of Modern Slavery to the scope of audits.

Lastly, GLISE replicate the grievance mechanisms of Munich Re, so that all employees have the opportunity to report concerns or compliance

breaches through various mediums.

GLISE's response to the COVID-19 pandemic

In the wake of the COVID-19 pandemic, GLISE closely followed concerns around the health and working conditions of its employees.

Since the beginning of the government-imposed lockdown measures, all staff were able to work from home. GLISE introduced expense schemes, wellbeing initiatives, and increased flexibility in working hours to support employees respectively with home office costs, changes in environment and balancing childcare / home schooling.

A phased return to office (R2O) has been planned alongside government easement measures, but a return has not been mandatory for any employee. To accommodate the R2O, risk assessments were performed and resultant actions taken to make the workplace COVID-secure, such as introducing strict policies on self-isolation, social distancing practices, desk booking systems, touch-free mechanisms and deep cleaning.

Nonetheless, the majority of the workforce have continued to work from home for the duration of 2020 and into 2021.

Final Remark

We will continue to work on the implementation of the 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 (Jun 22, 2021 09:41 GMT+2)

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