



SwissLife

# Principles on due diligence and transparency regarding child labour

Swiss Life respects human rights and is committed to preventing human rights violations both within Swiss Life itself and also within its supply chain. The avoidance of child labour is an integral part of these efforts.

These principles on due diligence and transparency summarise the applicable Group-wide rules on child labour. These rules can be found, for example, in the Code of Conduct, the Declaration of Respect for Human Rights, the Supply Management Group Directive and the local codes of conduct for business partners.

## Swiss Life's business activities

In its core business – insurance services, consulting and asset management – Swiss Life operates in a highly regulated financial services environment, predominantly in Central European countries. As it operates in the financial services industry, Swiss Life does not process any raw materials or produce any goods. As a result, Swiss Life is only exposed to a limited and indirect risk related to human rights violations, such as child labour, in its supply chains.

With respect to its own business activities, Swiss Life ensures that it complies with local legislation, including the avoidance of child labour. Swiss Life has in place various regulations relevant for addressing the risk of child labour.

## Code of Conduct

Swiss Life has a Code of Conduct that sets out Group-wide values and principles of business ethics as well as the binding rules of conduct as part of its business culture. Swiss Life expects its employees to fully comply with all applicable laws and regulations, all relevant internal directives and guidelines, as well as with the values, principles and rules set out in the Code of Conduct.

## Guidelines and standards

Compliance with all applicable legal provisions and regulatory requirements forms the basis of Swiss Life's business activities and the company has summarised its approach to respecting human rights in a Group-

wide declaration. Swiss Life thus ensures that it complies with applicable local requirements, such as the Swiss Ordinance on Due Diligence and Transparency in relation to Minerals and Metals from Conflict-Affected Areas and Child Labour (DDTrO), and that it takes into account internationally recognised standards. These include the following:

- International Bill of Human Rights
- UN Guiding Principles on Business and Human Rights (UNGPR)
- International Labour Organization (ILO) labour and social standards
  - *ILO Convention No. 111 concerning Discrimination in Respect of Employment and Occupation*
  - *ILO Convention No. 138 concerning Minimum Age for Admission to Employment*
  - *ILO Convention No. 182 concerning the Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour*
- Principles of the United Nations Global Compact (UNGC)

## Business partners

Swiss Life is aware of its responsibility, both in its own practice and in the practice of its business partners, to only tolerate employment relationships which comply with the minimum requirements under the ILO Conventions.

## Selection of business partners

When selecting business partners, Swiss Life considers ethical, ecological and economic principles and – when feasible – works with local providers or suppliers in OECD countries. Swiss Life carefully selects its business partners and follows a standardised procedure for taking into account risks and including ethical principles and environmental factors.

Companies that wish to work with Swiss Life must comply with both the relevant statutory provisions and Swiss Life's own requirements. If any of the agreed standards are breached, Swiss Life demands that corrective measures be implemented. In the event of serious or repeated breaches, the cooperation will be terminated. There is a regular contractually agreed right to carry out audits of suppliers and service providers.

### *Obligation of business partners*

Swiss Life also expects its business partners to follow similar ethical principles in their activities, to abide by the applicable law and to pass on these obligations to their subcontractors. Local codes of conduct for business partners set out minimum standards for the business relationship between the business partner and Swiss Life.

In the local codes of conduct for business partners, Swiss Life has set out its expectation that business partners will not employ children below the legal minimum age of employment in the relevant country or jurisdiction. If there is no minimum age for employment, the business partner may not employ children under 15 years of age. Employees under the age of 18 may only perform work in accordance with the relevant legal requirements (including working hours and conditions). Requirements regarding education and training must also be met.

### *Risk analysis and management*

Business partners are analysed and assessed in line with and taking into account Swiss Life's risk management framework. The criteria and frequency of the assessments follow a risk-based and proportionate approach to implementation. This includes taking into account, wherever possible, the place of origin / "made in" principle. To identify high-risk business partners, Swiss Life takes into account proven and recognised standards and data for supplier risk assessments.

In its core markets of Switzerland, France and Germany, Swiss Life works to a large extent with domestic suppliers, while foreign suppliers make up only a small proportion. Swiss Life procures services mainly from European service providers and suppliers in European countries where local regulations guarantee compliance with labour and human rights.

### *Supply chain audit*

Swiss Life has defined internal steps to systematically audit major suppliers. Audits take into account the requirements under the Ordinance on Due Diligence and Transparency in relation to Minerals and Metals from Conflict-Affected Areas and Child Labour.

### *Complaint mechanism*

Swiss Life notifies its stakeholder groups of the possibility of contacting them to report suspected incidents of misconduct.

#### **Additional information**

Additional information on how Swiss Life takes responsibility in terms of observance of human rights is available here:

- Swiss Life Annual Report*
- Code of Conduct*
- Declaration of respect for human rights*