



# Zurich UK Modern Slavery and Human Trafficking Statement 2019

This statement has been published in accordance with the Modern Slavery Act 2015 ("the Act") and in line with the Home Office statutory guidance. It sets out the steps taken by Zurich UK (see appendix) to deal with modern slavery risks in our business and supply chain and applies to our practices for the financial year ending 31 December 2019.

This statement continues to apply until any amendments are required and is subject to an annual review each year. The boards of the relevant Zurich UK entities approved this statement within the first half of 2020.

## Introduction

We oppose 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 of our employees are committed to following. We respect the protection of international human rights within our sphere of influence and work hard to ensure we are not complicit in human rights abuses. Zurich became a signatory to the United Nations Global Compact in 2011, 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

Zurich Insurance Group is a multi-line insurer that serves its customers in global and local markets. With about 54,000 employees, it provides a wide range of property and casualty, and life insurance products and services in more than 210 countries and territories. 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](https://www.zurich.com/) (<https://www.zurich.com/>).

## Our business and supply chains in the UK

Zurich in the UK provides a suite of general insurance and life insurance products to retail and corporate customers. We supply personal, commercial and local authority insurance through a number of distribution channels, and offer a range of protection, retirement and savings policies available online and through financial intermediaries for the retail market and via employee benefit consultants for the corporate market. Based in a number of locations across the UK - with large sites in Birmingham, Farnborough, Glasgow, London, Swindon and Whiteley - Zurich employs approximately 4,500 people in the UK.

Zurich UK operates in a sourcing environment that includes third parties and outsourcing arrangements. We deal with market leading expert suppliers and have robust procurement processes and control oversight in place, delivered through a mature assurance model. We have zero tolerance to slavery and human trafficking and expect our supply chain to meet the standards set within Zurich's Code of Conduct.

## Our policies applicable to slavery and human trafficking

We are committed to ensuring that there is no modern slavery or human trafficking in any part of our business or supply chain. As part of our initiative to identify and mitigate the risk of slavery and human trafficking in our business, all Zurich UK employees are required to meet the standards set within our Anti-Slavery and Human Trafficking Policy, which reflects our commitment to act ethically and with integrity in all our business relationships.

Our Reporting Concerns Policy supports employees to confidentially report suspected, potential or actual concerns, in good faith, including illegal or unethical conduct. Employees are encouraged to raise concerns if they have any suspicion of modern slavery within our business or supply chain.

Our 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. For more information about the Zurich's commitment to Corporate Responsibility and Sustainability and the Zurich Community Trust's work, please visit our website [here \(/en/about-us/corporate-responsibility\)](#).

Due diligence processes in relation to slavery and human trafficking

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

Our established procurement process is in place to support with 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 of the potential transaction. It also gives insight into the third party's structure, operations, culture, human resources, supplier and customer relationships, competitive positioning and future outlook.

A governance framework is in place and has been designed to support every step of the supply management lifecycle to ensure effective and efficient management of our suppliers. The framework takes into account industry best practice & methodologies, Zurich's internal policies as well as legal and regulatory requirements applicable to outsourcing and supplier management and is updated on a continuous basis. Zurich assesses our directly contracting suppliers in line with this framework and only retains suppliers who comply with our core competencies.

The UK supplier governance framework aims to mitigate the risk of modern slavery within the 1st tier of our supply chain by:

- Identifying and assessing modern slavery risk;
- Applying a standardised risk-based control framework to monitor modern slavery and;
- Provide relevant staff with training

## Training

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, including the protection of human rights.

The UK Modern Slavery Training provides an overview of Modern Slavery, how we manage associated risks through our control framework and how to report concerns. The training module is provided to Zurich employees that are directly involved with onboarding and management of our suppliers.

Our effectiveness in combating slavery and human trafficking

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 UK directly employing staff in enforced servitude is low, due to the nature of our business and the robust controls that we have in place.

In 2019 we reviewed the risk of modern slavery within the 1st tier of our supply chain, using criteria based on ILO standards. This exercise identified that 88% of Zurich UK's suppliers are considered low risk, due to the services provided and the location from which those services are provided from.

An enhanced risk-based supplier control framework was also designed in 2019 to monitor the risk of modern slavery, supported by a refreshed training package, both of which are in the process of being implemented across our business.

Monitoring of concerns reported through Zurich's confidential portal has demonstrated that during 2019, no suspected or actual instances of modern slavery were identified within our business, or supply chain.

### Further Steps

We will continue to embed our enhanced risk-based supplier control framework throughout 2020 and make changes as necessary.

Review of our internal policies, processes, training and support materials will also continue, to ensure they are appropriate, meet statutory standards, industry best practice and our Group Code of Conduct.

Signed

**Tulsi Naidu**  
CEO, Zurich UK  
June 2020



### Appendix – Zurich companies in scope of Section 54 of the Modern Slavery Act 2015 and the Modern Slavery Act 2015 (Transparency in Supply Chains) Regulations 2015

When we talk about "Zurich UK" in this Statement, we are referring to the companies within the Zurich Insurance Group which are in scope under Section 54 of the Modern Slavery Act 2015: Access Franchise Management Limited, Allied Dunbar Assurance plc, , Allied Zurich Holdings Limited, Ashdale Land & Property Company Limited, Dunbar Assets Ireland Unlimited Company, Dunbar Assets Limited, Eagle Star (Leasing) Limited, Eagle Star Holdings Limited, Eagle Star Securities Limited, Employee Services Limited, EFS Financial Services Limited, Grovewood Property Holdings Limited, Oak Underwriting plc, Sterling ISA Managers Limited ,Tennyson Insurance Limited, The Liverpool Reversionary Company Limited, ZPC Capital Limited, Zurich Assurance Ltd, Zurich Advice Network Limited, Zurich Building Control Services Limited, Zurich Community Trust (UK) Limited, Zurich Employment Services Limited, Zurich Finance (UK) plc, Zurich Financial Services (UKISA) Limited, Zurich Financial Services EUB Holdings Limited, Zurich General Partner (Scotland) Limited, Zurich Global Corporate UK Limited, Zurich Holdings (UK) Limited, Zurich Insurance Company (UK) Limited, Zurich Insurance plc, Zurich Insurance plc (UK Branch), Zurich Intermediary Group Limited, Zurich Investment Services (UK) Limited, Zurich Legacy Solutions Services (UK) Limited, Zurich (Scotland) Limited Partnership, Zurich Management Services Limited, Zurich Pension Trustees Limited, Zurich Project Finance (UK) Limited, Zurich Specialities London Limited, Zurich Transitional Services Limited, Zurich UK General Employee Services Limited, Zurich UK General Services Limited.

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