

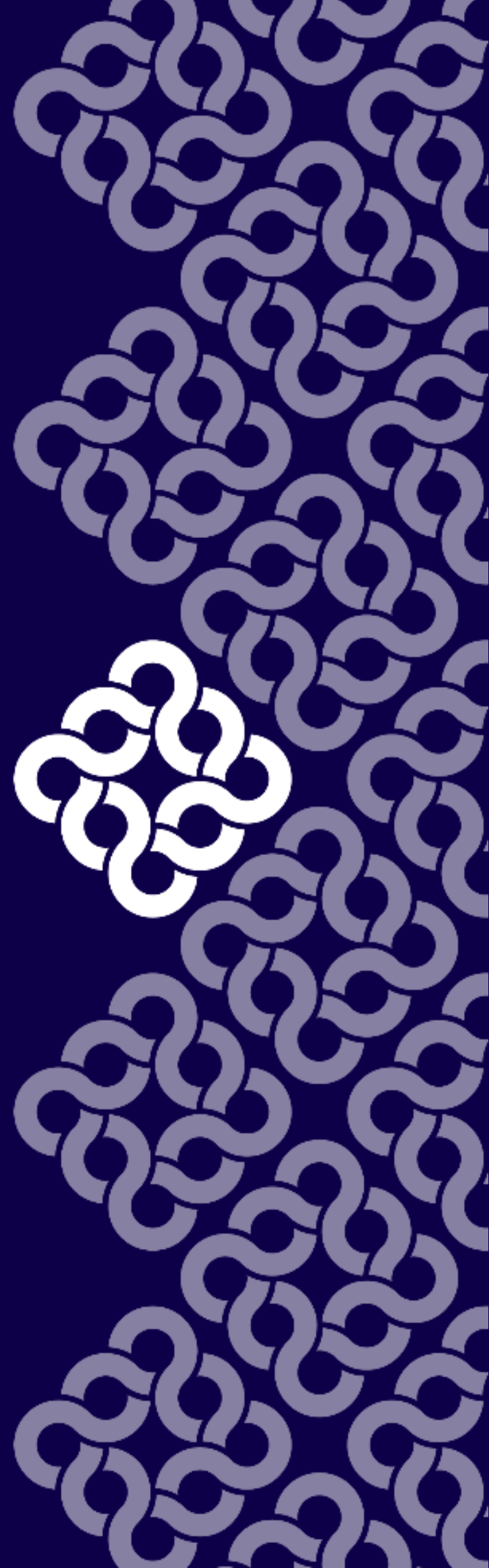
# MODERN SLAVERY

---

# STATEMENT

---

September 2022



OUR ORGANISATION  
STRUCTURE



## Our organisation structure

Athora Holding Ltd. is a private limited company registered in Bermuda. This statement covers the activities of Athora Holding Ltd. (Athora) and its subsidiaries.

OUR SUPPLY CHAINS  
AND RISK ASSESSMENT



## Our supply chains and risk assessment

Athora products are distributed within Europe and Athora does not make use of supply chains which are traditionally susceptible to an enhanced risk of slavery or human trafficking, such as factories, other entities involved in manufacturing, or business sectors which are reliant on a high degree of human labour.

OUTSOURCING



Athora provides life and pension products with a focus on the European Market. Athora also provides reinsurance through its subsidiaries, Athora Life Re domiciled in Bermuda and Athora Ireland plc. Athora operates licensed trading entities operating in Germany, the Netherlands, Belgium, Italy and Ireland.

Given the nature of Athora's business, we consider the risk of modern slavery in our supply chains low. However, we remain vigilant to this risk, and have in place several policies and procedures to ensure we do not knowingly do business with a company involved in any form of modern slavery or human trafficking.

OUR POLICIES

NEXT STEPS

Athora currently employees over 2000 staff globally.

## Outsourcing

Athora may outsource certain activities to support its business. Outsourced activities are subject to extensive due diligence by Athora and may require regulatory approval. Athora has a Sourcing and Vendor Management Policy which includes a Vendor Code of Conduct setting out what Athora expects of its 3rd parties in relation to employment standards and practises.

Additionally, Athora has an Outsourcing Risk Policy setting out our approach to outsourcing, as well as the due diligence which must be undertaken before Athora outsources any aspect of its business to a third party. As part of the due diligence process, Athora checks all potential service providers for financial soundness, sanctions and adverse media, and continually monitors providers on a regular basis.

Compliance with the Vendor Code of Conduct has been recently added to due diligence criteria further enhancing the companies commitment to conducting responsible and ethical employment practises.

## Our policies

As part of our commitment to ensuring there is no modern slavery or human trafficking in our supply chains or in any part of our business, we maintain policies and procedures to support this commitment including:

- **Code of Conduct:** outlining the ethical standards that all employees of Athora are expected to follow, to ensure Athora operates responsibly and ethically. These include ensuring employees act with integrity, due skill, care and diligence whilst displaying openness and transparency with all stakeholders including customers and suppliers.
- **Speaking Up Policy:** setting out the manner in which our staff and business partners can report any concerns relating to the activities of any Athora Group company or anyone involved in its supply chains, including circumstances which may give rise to a risk of human trafficking or slavery.
- **Recruitment and Remuneration Policies:** setting out the rights in which all our staff enjoy, including fair and reasonable wages, the right to a safe working environment, and appropriate holidays and provisions for sickness.
- **Risk Management Policies:** Athora's approach to effective risk management is outlined in its numerous Risk Management Policies. Any existing or emerging modern slavery risks will be captured as part of the risk management cycle, with mitigants.

## Next steps

Athora continuously reviews its risks in relation to modern slavery and human trafficking, both as an employer and as a purchaser of outsourced services, to identify measures we can take as a business to prevent modern slavery occurring in our business and supply chain.

We intend to take the following steps during the 2022/2023 financial year:

- Athora will publish a new and enhanced Group Code of Conduct which will reinforce the importance of the expected conduct in line with our values. Training will also be included alongside attestation of adherence. This will be repeated on a recurring basis and will be a mandatory requirement for all employees and contractors.
- Athora reviews its Outsourcing Risk Policy and supplier due diligence process on an annual basis to ensure our processes remain effective as the business grows.

The statement has been approved by the Management Executive Committee.



**Mike Wells**

Group Chief Executive Officer

September 2022



 [www.athora.com](http://www.athora.com)

 [www.linkedin.com/company/athoragroup](http://www.linkedin.com/company/athoragroup)