

## ERGO Group AG Statement on the UK Modern Slavery Act

This statement is made pursuant to section 54 (1) of the UK Modern Slavery Act 2015 and constitutes ERGO Group AG's slavery and human trafficking statement for the financial year ending 31 December 2024.

### The organisation's structure, its business and its supply chains

ERGO is one of the major insurance groups in Germany and Europe. With operations in over 20 countries, the ERGO Group offers a comprehensive spectrum of insurance, provision and services. In the financial year 2024, ERGO recorded a total premium income of 21 billion euros. It operates in all lines of primary insurance, with about 37,000 employees and sales agents throughout the world. At the end of 2024, the ERGO Group's investments amounted to 138 billion euros.

ERGO Group procures many different goods and services throughout the world. In our procurement decisions and activities, we aim to assume corporate responsibility along the value chain. Environmental, social and governance (ESG) criteria play an important role for us in the procurement of goods and services.

### Group policies in relation to slavery and human trafficking

Responsible behaviour is the foundation on which ERGO Group creates value for and with all its stakeholders. We are convinced that we can only successfully implement our business model by making choices based on a long-term, sustainable perspective. In our view, respect for human rights is a fundamental part of doing so. Accordingly, we are committed to respecting and upholding human rights in line with internationally accepted human rights principles and the United Nations Guiding Principles on Business and Human Rights.

ERGO Group's Board of Management expresses the importance of human rights and their high priority for the entire Group, which are also explicitly enshrined in our Code of Conduct. We substantiate our understanding of responsibility for human rights by recognising the following international guidelines and standards:

- the International Bill of Human Rights, which consists of the:
  - Universal Declaration of Human Rights
  - International Covenant on Civil and Political Rights
  - International Covenant on Economic, Social and Cultural Rights
- ILO (International Labour Organization) Declaration on Fundamental Principles and Rights at Work
- United Nations Guiding Principles on Business and Human Rights
- 10 Principles of the UN Global Compact
- Principles for Sustainable Insurance (PSI)
- Principles for Responsible Investment (PRI).

#### ERGO Group AG

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Based on our business model and supply chain, we have defined a set of fundamental human rights for ERGO Group which we expect our employees and suppliers to uphold in particular. These are consistent with the above-mentioned guiding principles and standards, as well as with legal requirements such as the German Supply Chain Due Diligence Act:

- **The right to healthy, safe and dignified working conditions:** these include the prohibition of the worst forms of child labour as well as forced labour, modern slavery and human trafficking, freedom of movement of migrant workers, the right to the payment of a living wage, a limit on working hours, the right to health and safety at work, as well as respect for the right to freedom of association.
- **The right to equality and non-discrimination:** no tolerance of discrimination on the grounds of disability, age, gender, ethnic origin, nationality, sexual identity, political views, race, religion or similar aspects. In employment and occupation, this applies in particular to the areas of recruitment, job assignment, dismissal, remuneration and promotion. No sexual or other personal harassment, and no offensive behaviour. Further, we do not tolerate socially inappropriate behaviour, intimidation, violence or the threat of violence.
- **The right to adequate living conditions** by protecting the habitats of local communities and/or indigenous peoples, avoiding environmental hazards and seeking to prevent or reduce their negative health impacts.

## Due Diligence and risk management

Our goal is, to be best of our knowledge and ability, to prevent or mitigate any potentially adverse impacts of our business on human rights compliance. To ensure fulfilment of our due diligence obligations, we have therefore established processes for identifying risks concerning the infringement of human rights and for addressing them with appropriate measures.

Our corporate due diligence requirements are set out in various guidelines, codes and work instructions. The processes include the following components:

- A risk management system with clearly defined processes and responsibilities:
  - Regularly conducting risk analyses
  - Embedding preventive and remedial measures in our business units
  - Monitoring and reviewing the effectiveness of measures
- Whistleblowing management system
- Documentation and reporting

In order to embed this risk management company-wide, ERGO Group has adopted a policy on respecting human rights. The policy sets out the basic human rights compliance requirements for employees and suppliers across the Group and defines how we address human rights risks in our business operations. With the standards established in the policy, we strive to fulfil our duty of care and work to ensure that human rights are respected within our Group.

## Governance

The ERGO Group Human Rights Officer is responsible for monitoring risk management to fulfil our due diligence obligations with regard to human rights and environmental aspects under the German Supply Chain Due Diligence Act. Since 2024, the mandate also includes the function as Human Rights Officer for the Group companies ERGO Beratung und Vertrieb AG, ERGO Direkt AG and ITERGO Informationstechnologie GmbH. The Human Rights Officer will report to the Board of Management and the management of these companies at least once a year on the current risk situation, any preventive measures that may have been taken and their effectiveness.

## Risk analysis

With the help of a structured risk analysis along our supply chain, we systematically check which business units or activities could be prone to an increased risk of human rights violations or environmental harm.

Based on the results, we have analysed the following four risk areas for our group of companies:

- Employees
- Procurement
- Core business of insurance
- Investments

Processes have been implemented in these areas to reinforce existing ESG requirements and to facilitate the identification of potential human rights risk.

In addition, risk analyses are carried out on an ad hoc basis in response to significant changes in the risk situation, such as expansions into new business areas or product offerings, or if we become aware of related breaches of duty on the part of our direct and indirect suppliers.

The risk analysis is based on a country-and-sector list based on external indices which is compiled based on external indices and updated regularly. We also use this list to screen new and existing business relationships and, if necessary, initiate preventive or remedial measures.

Moreover, we strive to reject business relationships with and investments in companies that have been involved in confirmed and substantial human rights violations. For this purpose, a list of companies with which we want to exclude business has been developed in a multi-stage process based on information from external data providers. The list is regularly reviewed, updated and approved as part of our ESG governance. The implementation of these regulations includes our investments, procurement and our core primary insurance business.

### **Identified risks**

As an employer, we undertake to comply with international standards of human rights and to provide adequate working conditions for our staff. Our Code of Conduct for employees defines our standards for respecting human rights. Our risk analysis determined that, despite the global presence of our companies, we are exposed only to isolated risks of human rights violations in a few countries. These include potential risks related to the right to freedom of association in countries where this right is restricted, as well as possible claims of discrimination or unequal treatment.

Our goal in procurement, when making decisions and taking action, is to adhere to our compliance principles and thus assume corporate responsibility along the supply chain. Avoiding ESG risks is pivotal in our procurement of goods and services.

We expect our suppliers to comply with our extensive Code of Conduct for suppliers, which defines core principles on protecting human rights and the environment. Our risk analysis determined that, given the nature of the goods and services we procure, there is an increased risk of human rights violations among our suppliers only in a few product groups. We reserve the right to carry out case-by-case reviews with suppliers from these product groups from which we can derive and implement remedial measures if required.

As a globally active insurance company, we are aware that we have to be vigilant for a multitude of possible human rights violations and potential environmental hazards in our business. In our underwriting guidelines for our business in primary insurance, we have therefore incorporated an enhanced risk analysis for certain large commercial business clients. The focus here is on client groups for which – given their geography and sector – structural factors contribute to an increased risk of human rights violations.

ERGO Group defines in its underwriting and product development guidelines how underwriters and product manager should deal with ESG risks in the insurance business. The existing framework will be expanded if necessary.

Our Responsible Investment Guidelines contain ESG criteria that help us identify risks and opportunities. In order to evaluate investments according to ESG criteria, Group Investment Management uses e.g. ESG ratings from external data providers.

We also support the international conventions in the controversial weapons context (including but not limited to the weapon categories anti-personnel mines and cluster munition), and address this in corresponding guidelines for our investments and for our core business insurance.

### **Whistleblowing management system**

Human rights-related risks and breaches of human rights-related duties can be reported using the ERGO Group whistleblowing portal. Whistleblowers can access the portal via our Intranet or the publicly available ERGO Group website. Accordingly, relevant information can be shared securely, confidentially and, on request, anonymously – globally and round the clock. Evidence of potential human rights violations that reaches us via other channels is handled using the same principles and processes.

All information received relating to human rights is handled in accordance with the risk management process described above and in collaboration with the respective department. Every reported case of potential misconduct is carefully reviewed and confirmed violations are, if necessary, duly punished. When human rights violations within our remit are brought to our attention, we enter into a dialogue with the parties in question and pursue remedial measures.

### **Preventive and remedial measures**

In the event of rising risks or concrete evidence of potential human rights violations that are either revealed in the course of our monitoring or supplied to us via our whistleblowing channels, we carefully review the facts and initiate the preventive or remedial measures needed in order to avoid, end or mitigate the violation in question. In line with governance processes, depending on the extent of the breach, the ERGO Reputational Risk Committee is involved in the decision, which is also responsible for assessing ESG risks.

### **Documentation and reporting**

The ERGO Group is included in the reporting of Munich Re, which reports in the combined non-financial statement according in the Annual Report as well as in its reporting on the Principles for Responsible Investment (PRI) how the Group fulfils its obligations with regard to human rights.

### **Raising awareness: Training and capacity building on human rights**

In order to raise staff awareness, familiarise them with the key compliance rules and help them understand the importance of following these rules at work at all times, employees re-certify their knowledge of the Code of Conduct regularly. This training course includes information on equal treatment, reporting of infringements, data protection and fraud. Furthermore, special training courses on human rights due diligence have been established for employees in the procurement units.

### **Progress in the financial year 2024**

We will continue to work on the implementation of human and labour rights aspects and to consider our obligations under the UK Modern Slavery Act 2015.

ERGO published the first annual report on the fulfilment of the Group's due diligence obligations in the previous reporting year 2023 as required by the German Supply Chain Due Diligence Act. No significant risks or violations with regard to human rights were identified.

The risk analyses to ensure that due diligence is maintained with regard to the workforce of ERGO companies in Germany and abroad, as well as the risk analyses in global supplier management, did not indicate any significant changes compared to the previous year. No serious human rights-related complaints were received via ERGO whistle blowing channels.

The company's own due diligence processes were continuously monitored by the ERGO Human Rights Officer and by the responsible Group functions, and further developed as required. As part of the annual training sessions on the Group's Code of Conduct, employees were again made aware of the importance of respecting human rights.

Our goal is to continuously improve our compliance-related processes and expand our risk assessment. Our risk management processes and risk analysis are reviewed periodically.

This Statement has been approved by the Board of Management of ERGO Group AG on 26 May 2025.

Düsseldorf, June 2025

A handwritten signature in blue ink, appearing to read 'Rieß' followed by a stylized flourish.

Dr. Markus Rieß  
Chairman of the Board of Management  
ERGO Group