

# Vanguard Assurance Company — Human Rights Policy

## 1. Statement of Commitment

Everyone has the right to be treated with fairness, respect, and dignity. We recognise that businesses have an important role to play in understanding and managing risks to human rights.

### We are committed to:

- Supporting and respecting internationally recognised human rights. We support the principles of Human Rights set out in the Universal Declaration of Human Rights, and the International Labour Organisation's (ILO) Declaration on the Fundamental Principles and Rights at Work.
- Ensuring we are not complicit in human rights abuses.

## 2. Scope & Expectations of Business Partners

Our Human Rights Policy applies to all employees, subsidiaries and intermediaries. It also extends, as far as is reasonably achievable to partners, suppliers, and third-party contractors.

We will work with business partners to ensure compliance to these standards. This policy will be communicated to all our employees and shared with business partners.

## 3. Compliance and Enforcement

Internal and external stakeholders should report concerns or suspected human rights abuses promptly through designated channels, such as the Vanguard Hotline. Reports will be promptly investigated, and appropriate actions will be taken to address any violation of the human rights policy. Failure to adhere to the principles outlined in this policy may result in disciplinary action, including the termination of employment.

## **4. Human Rights Focus Areas**

We recognise the importance of identifying, prioritising, and addressing our human rights risks. Therefore, we believe our main responsibilities lie in several critical areas: our employees, our customers, and our supply chain.

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### **4.1. Our Employees**

- We recognise that our employees are integral to our success, and we are committed to upholding their human rights and promoting a positive work environment.
- We uphold the principles of equal treatment and non-discrimination in all aspects of employment, and we ensure that all employees are treated fairly and with respect.
- We recruit based on professional capabilities and qualifications, without discrimination.
- We believe in fair and equitable compensation for all employees, ensuring that salaries and benefits reflect the value of their contributions. We ensure that employees receive competitive wages, benefits, and opportunities for advancement.
- The health and safety of our employees is paramount, and we are committed to providing a work environment that is safe, healthy, and free from hazards.
- We engage with our employees to understand any human rights issues affecting them. We respect our employees' right to privacy, and their right to trade union membership.
- We create an environment for employees to express opinions, address requests and complaints, and support their development through equal training opportunities.
- We prohibit any form of harassment in the workplace or during business activities.

## **4.2. Our Customers**

- We respect our customers' right to privacy and data protection, safeguarding their personal information against unauthorised access, use, or disclosure. We adhere to strict data protection laws and industry standards to ensure the confidentiality and security of customer data.
- We are committed to providing products and services that meet the needs and expectations of our customers while upholding high standards of quality, safety, and reliability.
- We do not engage in deceptive or unfair practices, and we strive to always maintain open and honest communication with our customers.
- We are transparent about our business practices, pricing policies, and terms of service, providing clear and accurate information to customers to help them make informed decisions.
- As far as reasonably achievable we strive to make our products and services accessible to all customers, regardless of their abilities or circumstances.

## **4.3. Our Supply Chain**

We are committed to promoting respect for human rights throughout our supply chain and, as far as is reasonably achievable, take proactive measures to identify, address, and mitigate human rights risks.

## **5. Oversight**

Our Board of Directors have adopted this Human Rights Policy on behalf of Vanguard Assurance. They have delegated the responsibility to implement the policy to senior operational executives that report to our CEO. The Head of Human Resources and our Legal Counsel oversee the overall implementation and report on progress and impact to the Board of Directors and the leadership team on a regular basis.

## **6. International vs. National Requirements**

Example: While our Human Rights Policy is aligned with internationally recognized human rights standards, we also comply with applicable national laws and regulations where we operate. Where national requirements fall short of international standards, we will follow processes that seek ways to honour the principles of international human rights standards.