

## **Slavery and Human Trafficking Statement for the fiscal year 2022**

### **About this statement**

Tokio Marine & Nichido Fire Insurance Co., Ltd. (hereinafter “TMNF”) is a subsidiary of Tokio Marine Holdings, Inc. TMNF carries out its business with other Tokio Marine Group companies in various countries and regions including the United Kingdom (UK). TMNF is publishing this slavery and human trafficking statement (hereinafter “the Statement”) on its corporate website in accordance with the requirements of Section 54 of the UK Modern Slavery Act 2015.

The Statement has been approved by the TMNF Management Committee and signed by Mr. Hiroshi Sakiyama, Managing Director of TMNF.

### **Organisation’s structure, business and supply chain**

Tokio Marine Group comprises Tokio Marine Holdings, Inc. (hereinafter “TMHD”), two hundred and sixty-eight subsidiaries including TMNF and twenty-six affiliated companies under its parent company TMHD (as of 31 March 2023). It operates in domestic non-life insurance business, domestic life insurance business, international insurance business and financial and other businesses.

More information can be found at:

[www.tokiomarinehd.com/en/company/about/](http://www.tokiomarinehd.com/en/company/about/)

Tokio Marine Group’s supply chains comprise business partners including suppliers and subcontractors. We use routine suppliers and contractors for goods and services required for the maintenance and support of our business operations in London and elsewhere. As the Tokio Marine Group operates mainly in insurance and insurance related businesses, we normally do not act as a producer, manufacturer or retailer of physical goods.

### **Policies**

Tokio Marine Group has adopted the Group Corporate Philosophy which includes the commitment that "Acting as a good corporate citizen through fair and responsible management, Tokio Marine Group will broadly contribute to the development of society".

More information can be found at:

[www.tokiomarinehd.com/en/company/philosophy.html](http://www.tokiomarinehd.com/en/company/philosophy.html)

In implementing our Corporate Philosophy, Tokio Marine Group has formulated the “Tokio Marine Group Sustainability Charter” to set out principles of conduct in relation to social responsibility and to respect and promote the recognition of

human rights of all people, including customers, shareholders/investors, insurance agents, business partners, employees and local communities/society.

More information can be found at:

[www.tokiomarinehd.com/en/sustainability/management/csr\\_charter.html](http://www.tokiomarinehd.com/en/sustainability/management/csr_charter.html)

Tokio Marine Group supports and respects the Universal Declaration of Human Rights, the OECD Guidelines for Multinational Enterprises, the ILO Core Labour Standards, the UN Guiding Principles on Business and Human Rights (The Ruggie Framework) and ISO 26000. TMHD is a signatory to the UN Global Compact.

Tokio Marine Group respects human rights in its business activities including insurance underwriting and investment and financing through the signing and supporting of, among others, the United Nations Environment Programme Finance Initiative (UNEPFI), the Principles for Sustainable Insurance (PSI) and the United Nations-supported Principles for Responsible Investment (PRI). We will also work to resolve human rights issues through the provision of insurance products as well as investment and financing.

Tokio Marine Group works to understand and incorporate international principles and guidelines concerning human rights. It participates in and contributes to initiatives concerning social responsibility, and by doing so, works towards realising a sustainable society.

The “Tokio Marine Group Code of Conduct” summarises important matters of conduct which are given the highest priority in our day-to-day business. It requires directors, officers and employees to conduct fair and equitable business activities in conformity with laws and social norms and requires Tokio Marine Group to undertake equitable business activities. In addition, Tokio Marine Group has established “Tokio Marine Group - Our People” as a universal philosophy and concept for human resources management to be shared in relevant countries and regions worldwide.

Moreover, Tokio Marine Group has established the “Tokio Marine Group Basic Policy on Human Rights” which outlines the approach to promoting the respect for human rights throughout our business activities including our entire value chain. Tokio Marine Group has also established the “Tokio Marine Group Policy to Address Environmental and Social Risks” as a countermeasure against transactions with businesses in high-risk sectors which have negative impacts on the environment and society in line with policies such as the “Tokio Marine Group Basic Policy on Human Rights” and the “Tokio Marine Group Responsible



Procurement Guidelines” as a code of business conduct for promoting responsible procurement and sourcing practices across the entire value chain in collaboration with business partners.

More information can be found at:

[www.tokiomarinehd.com/en/sustainability/management/humanrights.html](http://www.tokiomarinehd.com/en/sustainability/management/humanrights.html)

[www.tokiomarinehd.com/en/sustainability/management/environmental\\_social\\_risks.html](http://www.tokiomarinehd.com/en/sustainability/management/environmental_social_risks.html)

TMNF has issued its “Principle of Transactions” which outlines the social responsibility matters that must be followed when conducting transactions.

### **Due diligence processes**

#### **Assessing our risks**

In insurance underwriting, we have identified specific industries and businesses with high human rights risks based on international norms regarding human rights, external information and industry trends. For these industries and businesses, we determine whether or not to underwrite them based on internal policies and procedures, and by taking into consideration human rights and modern slavery risks.

#### **Addressing our risks**

The parent company TMHD regularly carries out monitoring of initiatives for compliance and risk management in the business operations of Group companies including TMNF.

Specifically, based on the "Tokio Marine Group Basic Policy on Personnel", Tokio Marine Group requires TMHD and Tokio Marine Group companies\* to (1) formulate and thoroughly implement policies, (2) improve organisational structure, (3) implement training, (4) formulate and implement policies for fair recruitment selection, and (5) formulate harassment prevention regulations in the workplace and establish a consultation desk, etc. We also require them to report on these achievements.

In addition, Group companies in Japan conduct self-inspections using the Tokio Marine Group Checklist on Human Rights Issues in order to; deepen our understanding of our progress on human rights efforts as an employer; identify human rights and labour issues for our Group employees; and prevent, mitigate, and improve such issues.

TMNF also checks the status of each department's efforts at the end of each fiscal year. As regards TMNF subsidiaries, we request them to submit a check sheet

every six months to confirm the implementation status of human rights awareness training.

Through these efforts, TMNF confirms its Group companies' efforts of "respect for free will and freedom of retirement", "calculation and payment of fair wages", "prohibition of discrimination and harassment", "provision of disciplinary grounds in work regulations" and "monitoring of long working hours", etc. to reduce human rights risks that may be related to modern slavery by complying with laws and regulations.

There may be cases where it is not appropriate to report a possible compliance problem including modern slavery through a usual reporting channel set up within the organisation. To prepare for such cases, Tokio Marine Group operates internal and external hotlines (whistleblower contact points) to receive reports and inquiries from directors, officers and employees of Group companies. We clearly specify in our regulations that we will never allow persons making such reports or inquiries and those cooperating in investigations to be exposed to negative consequences because of their action and keep details of reports and inquiries strictly confidential.

Furthermore, concerning our business partners, to implement social responsibility initiatives and integrate them into the value chain, TMNF issues the "Principle of Transactions" to new business partners including suppliers and subcontractors (excluding insurance agents) whose transaction amount is equal to or greater than one million Japanese Yen. It requires these business partners to promote initiatives for "compliance with laws, regulations and social norms", "promoting fair and honest transactions", "thorough information management", "consideration for the environment", and "strengthening a relationship of trust".

\*"Tokio Marine Group companies" refers to the companies specified in the "Basic Policy for the Management of Group Companies."

### **Assessing the effectiveness of our actions**

In the event that an employee, a director or an officer discovers an issue or potential issue in relation to compliance, Tokio Marine Group requires such person to immediately report and consult on the issue through organisational channels based on the "Tokio Marine Group Compliance Standards". However, to prepare for cases where it is not appropriate for employees or directors and officers to report or consult through organisational channels, the Group has installed in-house and external whistle-blowing channels (hotlines), which are



staffed by internal and external specialists.

The department in charge summarises the patterns and number of reports sent to the counter and utilises the information to improve efforts on human rights and labour practices.

In addition, Tokio Marine Group regularly conducts employee engagement surveys and monitors employee satisfaction with the environment of respect for human rights in the workplace.

At TMNF, a dedicated department (Human Rights Awareness and Diversity Promotion Division, Human Resources Department) formulates “Basic Policies and Measures Concerning Human Rights” every year and implements measures across all departments, evaluates the effectiveness of them and provides instruction on required remediation actions for areas of improvement.

### **Training**

Tokio Marine Group companies conduct Human Rights training as part of various training programmes including the programmes for new recruits and e-learning and regular programmes in the workplace, in which all employees and other co-workers take part to build a vibrant corporate culture without slavery, human trafficking, discrimination and harassment. TMNF also conducts Sustainability training and Compliance training for all employees to promote the understanding of and efforts to address human rights-related issues including modern slavery.

### **Future commitments**

As a Group, and with the cooperation of our business partners, we will continuously work to prevent the occurrence of modern slavery and promote respect for human rights throughout our business activities including the entire value chain.

20 September 2023



Hiroshi Sakiyama  
Managing Director, Member of the Board  
Tokio Marine & Nichido Fire Insurance Co., Ltd.