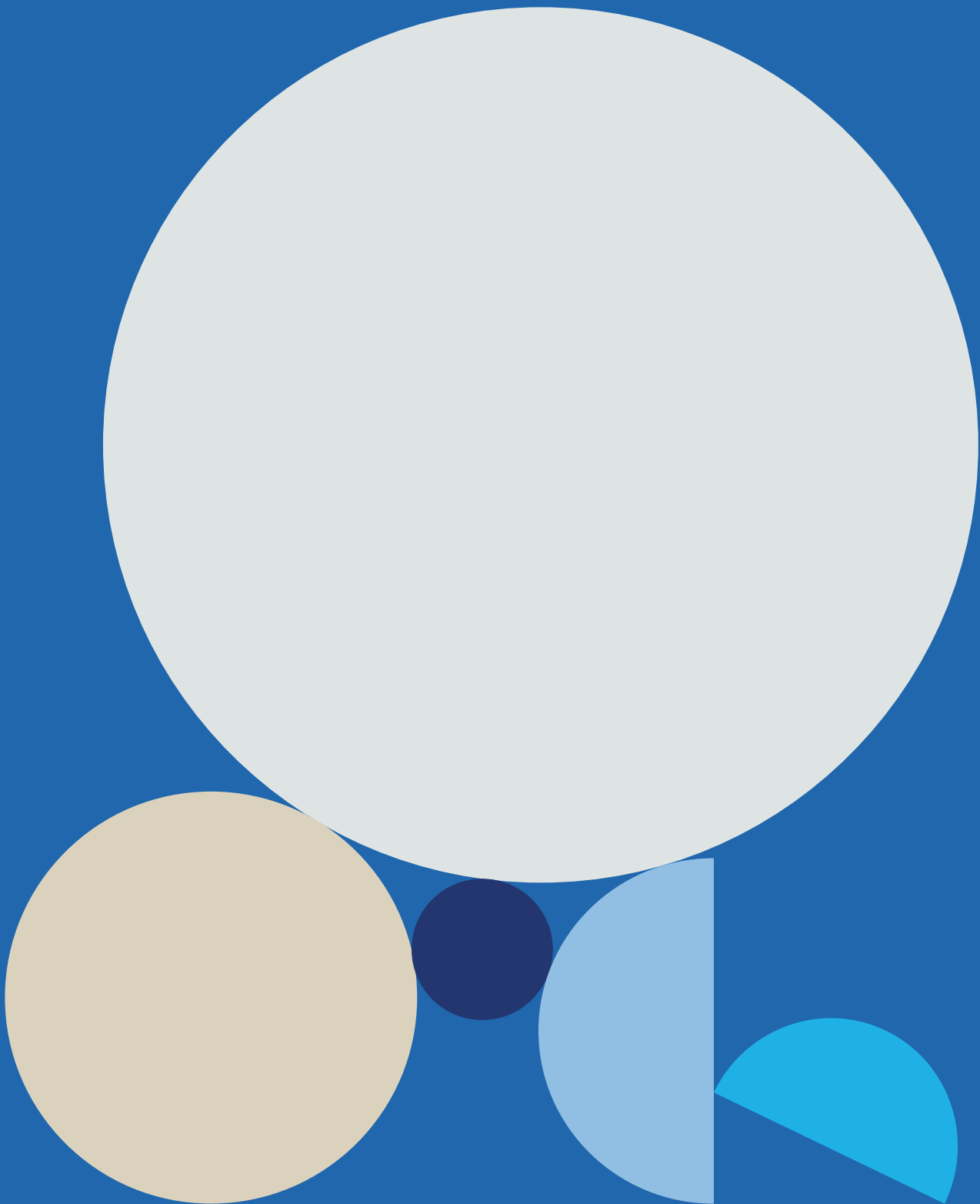


June 2026



# Zurich's approach to respecting human rights

High level summary



# High level summary of Zurich's approach to respecting human rights

## 1. Introduction

Zurich strives to ensure respect for human rights, at all levels of the business. Our commitment to respect human rights is part of our Group's Code of Conduct.

We respect the protection of international human rights within our sphere of influence and work hard to avoid being complicit in human rights abuses. Zurich is committed to fair and responsible business and takes a zero-tolerance approach to bribery and corruption and any business conduct that could create the appearance of improper influence.

[Code of Conduct](#)

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## 2. Purpose

The purpose of this document is to provide a high level summary of our approach to respecting human rights.

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## 3. Our approach

When interacting with employees, customers, investees, shareholders, suppliers, partners, distributors, the public at large or any other stakeholder, we aim to promote the following best-practice standards to manage potential adverse human rights impacts:

- United Nations Guiding Principles on Business and Human Rights: Implementing the United Nations Protect, Respect and Remedy Framework
- OECD Guidelines for Multinational Enterprises
- United Nations Global Compact

These principles are included in our Code of Conduct, which applies to our employees and Board members. We endeavor to work with third parties such as consultants, advisers, suppliers and agents who share our values, and we expect our business partners to adhere to the spirit of our Code and embrace high standards of business conduct.

Zurich employees are required to complete training on our Code annually and acknowledge that they have read our Code, and that they understand and agree to be bound by the provisions contained in our Code and our other internal policies. Employees are asked to do so upon hire, and annually after that.

We assess possible adverse human rights impacts within our sphere of activity, which includes our role as an employer, as an insurer, and as an investor, as well as our own operations and supply chain and our position within society.

By signing the UN Global Compact in 2011, we committed to aligning our strategy, culture and day-to-day operations with the Global Compact's 10 universally accepted principles in the areas of human rights, labor, environment and anti-corruption.

We pay special attention to transactions that might contravene human rights and forced labor. Six of the 10 UN Global Compact principles relate to human rights:

- Principle 1: Businesses should support and respect the protection of internationally proclaimed human rights; and
- Principle 2: make sure that they are not complicit in human rights abuses.
- Principle 3: Businesses should uphold the freedom of association and the effective recognition of the right to collective bargaining;
- Principle 4: the elimination of all forms of forced and compulsory labour;
- Principle 5: the effective abolition of child labour; and

- Principle 6: the elimination of discrimination in respect of employment and occupation.

Zurich reviews its approach to respecting human rights in light of regulatory developments, emerging risks and stakeholder expectations, and updates frameworks and guidance where appropriate.

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## 4. Scope

Our Code of Conduct applies to everyone at Zurich and its subsidiaries worldwide, including board members and employees including management. Regardless of our role, responsibilities or where we are located in the world, we each do our part to consider the Code and related policies as we go about our daily activities and decisions. We endeavor to work with third parties such as consultants, advisers, suppliers and agents who share our values, and we expect our business partners to adhere to the spirit of our Code and embrace high standards of business conduct.

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## 5. Speaking up about Integrity Concerns

Zurich provides mechanisms for employees and other relevant stakeholders to report suspected or actual illegal, fraudulent, improper or unethical conduct (“Integrity Concerns”), including issues related to human rights.

Employees, suppliers and other business partners may raise Integrity Concerns, including human-rights related issues, confidentially, including through the Zurich Ethics Line, or via other locally available reporting channels.

Zurich does not tolerate retaliation against any employee or other person reporting an Integrity Concern in good faith. Reports are handled confidentially and in accordance with applicable internal policies and processes.

Integrity Concerns are reviewed and assessed by the relevant functions. Where appropriate, follow-up actions may be taken to address identified issues or mitigate adverse impacts. The handling of Integrity Concerns and any resulting actions are subject to applicable governance and oversight arrangements.

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## 6. Roles and responsibilities

### 6.1 Our responsibility as insurer

As per our signing of the UN Global Compact, our approach to managing sustainability risks in business transactions has a particular focus on transactions where the insured customer may have an established track record of human rights violations, or is implementing projects that are particularly prone to potential human rights and environmental issues, such as mining or oil and gas projects. Human rights issues that are considered are:

- Child labor
- Forced labor and compulsory labor
- Involuntary relocation of local communities, inappropriate use of force or adverse impacts on vulnerable indigenous people. Evidence of such violations can include, but is not limited to, the absence of right of free, prior and informed consent for Indigenous Peoples (FPIC).
- Poor health and safety conditions
- Instances of bribery and corruption

Through our underwriting guidelines and checklists, we apply guidance on underwriting decisions including clear referral processes.

### [Our positions](#)

### 6.2 Our responsibility as investor

Proactively integrating environmental, social and governance (ESG) factors, including human rights, in our investment strategy helps Zurich to aim for substantial, long-term outcomes that benefit both people and the planet.

Through impact investing, Zurich can help fund solutions to some of the pressing social or environmental issues of our time. We have a direct interest in sustainable global economic growth and supporting communities in becoming more resilient to environmental and social challenges. Impact investments can help address these issues through targeted, positive impact and also offer a financial return commensurate with risks.

We consider principal adverse impacts of prospective and active investments. We have a framework in place to identify and assess those impacts. Examples of principle adverse impacts that can also represent material sustainability risks include, but are not limited to:

- Climate change risks (transition risks, physical risks and litigation risks).
- Activities negatively affecting biodiversity or increasing water stress.
- Deforestation, land degradation, and depletion of natural resources.
- Raw material sourcing.
- Environmental and health impacts of hazardous chemicals, waste and pollution.
- Exposure to banned cluster munitions and anti-personnel land mines.
- Human rights including labor rights in the supply chain.
- Community impact.
- Human capital: health and safety and labor management.
- Product safety.
- Corruption and bribery matters.
- Breaches of regulation, international norms and conventions.

We are a signatory of the United Nations Global Compact, the UNEP FI Principles for Sustainable Insurance and the Principles for Responsible Investment (PRI). This approach is adapted to each asset class and is applicable to assets managed by us, as well as our own assets managed by external asset managers.

### [Responsible investment](#)

#### 6.3 Our responsibility as employer

Zurich does not tolerate harassment, discrimination or bullying in the workplace, whether based on personal identity and expression (e.g., race, ethnicity, color, sex, gender, gender identity or expression, sexual orientation), origin (e.g., national or social origin), beliefs and opinions (e.g., religion or religious belief, political opinion), life circumstances (e.g., age, disability, civil status, pregnancy, caregiving responsibility, veteran status), health and physical characteristics (e.g., past or current health condition, physical or genetic characteristics) or any other relevant characteristic protected under applicable law. This applies regardless of an individual's duties or position within Zurich.

These principles apply to the entire employee life cycle, such as recruiting, assignments, training, development, promotion, compensation, performance management and termination as well as the day-to-day collaboration between colleagues.

Zurich strives to maintain an environment free from all forms of discrimination and harassment. Employees are expected to promptly report any instances of harassment, discrimination or bullying to their manager or Human Resources. Employees may also use the Zurich Ethics Line to raise any such concerns.

Every year, we run a company-wide employee experience survey, supported by regular local surveys, to make sure our employees' voices are heard.

Zurich does not tolerate retaliation, including threats and attempts of such, against any employee or other person reporting an Integrity Concern in good faith.

Zurich recognizes the right of its employees to freedom of association and collective bargaining and to freely form and join groups for the promotion and protection of employment interests.

### [Code of Conduct](#)

We take health and safety seriously wherever they work. We aim to create working conditions - physical, digital, and psychological - that enable employees to thrive and perform sustainably over the long term. Our structured, systems-based approach ensures that everyone can work safely, wherever they are. Health and safety officers in each country, supported by global management groups, help us meet our goals and continually improve. Group-wide policies and procedures protect all employees, helping reduce incidents and injuries. We support people to take personal responsibility for their own and others' health and safety.

[What it's like to work at Zurich](#)

#### 6.4 Working with suppliers

When working with suppliers, we apply our Supplier Code of Conduct which sets a clear expectation that our suppliers respect human rights. Each year, we conduct an annual human rights risk assessment to identify potential adverse impacts on human rights within our supply chain. Our assessments have found that the labor standards and workplace practices operated by our suppliers are a critical factor in the likelihood of adverse human rights impacts occurring.

The first step in our human rights risk assessment is to analyze the human rights set out in the United Nations Declaration of Human Rights, and seek to identify which, if any, of these fundamental human rights could be adversely impacted by suppliers with a direct buying contract.

We then seek to identify the goods and services categories and countries where the potential risk of adverse impacts to human rights issues is highest. To identify high-risk goods and services categories, we consider data and reports from reputable NGOs and our own internal expert judgement. Our assessment is based upon the prevalence of human rights issues reported and an assessment of working practices at industry or sector level. Our assessment of high-risk countries is based on:

- The reported prevalence of human rights issues.
- The degree of respect for worker rights, based upon local laws and actual practices.
- The extent of political freedom and civil liberties.
- The extent of corruption.

We share the findings of this assessment internally with relevant colleagues interacting with suppliers, provide specific training, and carry out risk-based due diligence on suppliers.

[Sustainable Sourcing Framework](#)

#### 6.5 Working with communities

The Z Zurich Foundation is a Swiss-based charitable foundation established by members of the Zurich Insurance Group. The Z Zurich Foundation works in collaboration with our local offices and communities around the world to support initiatives to create brighter futures for vulnerable people, to help them adapt to climate change, improve their mental wellbeing, reach their full potential and become more resilient towards catastrophes.

[Z Zurich Foundation](#)

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