

U.K. Modern Slavery Act Statement

2018

1. Introduction

We, Aetna Insurance Company Limited and Aetna Global Benefits (UK) Limited, support the fundamental principles of human rights across our business and in each region where we have a presence. This is demonstrated through a commitment by management to adopt and embed ethical standards internally and externally, and to implement policies and processes that reinforce this. We adhere to all laws in countries where we do business, and this includes laws that apply to contractors and suppliers such as the anti-human trafficking provisions of the UK Modern Slavery Act of 2015.

Accordingly, we will not tolerate modern slavery whether in our business or in those organizations that we engage or conduct business with. To that end this statement, made pursuant to the UK Modern Slavery Act 2015 outlines the steps we are taking to mitigate the potential risk of modern slavery occurring in our business and supply chains.

2. Our organization

We are part of the Aetna International group of companies which provides international private medical insurance to customers across the Americas, Europe, Middle East, Africa and Asia and we have over 1000 staff working across these regions. Our products are provided to individuals, small/medium enterprises and large corporate businesses through agents, brokers, corporate partners and directly.

Please visit our website at www.aetnainternational.com to find out more.

3. Our controls

We are committed to operating and conducting our business in a way that promotes corporate ethics and respect for human rights. Accordingly, our statement reflects this commitment, and details the policies and procedures we have put in place to support it. These include:

- [Aetna Code of Conduct](#) - Our Code of Conduct is grounded in and reflects the principles at the heart of The Aetna Way (Integrity, Excellence, Inspiration & Caring). The Code guides our compliance with the rules and regulations that govern our business throughout the world. Compliance with our Code and other regulatory requirements is everyone's responsibility, from the top to the bottom of our organization. We not only expect this commitment of our staff, but we also expect our contractors and subcontractors to maintain comparable policies and practices. We provide annual training to all employees on business conduct & integrity (including coverage of key aspects of the Code).

- **Aetna International third-party payment policy:** We have adopted due diligence procedures to enable the identification and mitigation of financial crime and corruption risk. As part of this process several checks are conducted at the onboarding stage of a third-party business relationship and annually thereafter to ensure that our suppliers meet certain legal, regulatory and other Aetna ethical standards.

- **Aetna International procedures for raising concerns:** We:
 - encourage employees to report suspected wrongdoing as soon as possible, secure in the knowledge that their concerns will be taken seriously and investigated as appropriate, and that their confidentiality will be respected;
 - provide employees with established reporting channels (including those that maintain anonymity) and give guidance on how to raise concerns;
 - reassure employees that they are able to raise genuine concerns without fear of reprisals, even if they turn out to be mistaken.

This ensures that employees are encouraged and able to report concerns in relation to the violation of human rights or any breach of the Code, our company policies or relevant laws without fear of retribution.

- **Aetna International employment policy:** Our employees are the face of the business as such we expect our employees to conduct themselves with honesty, integrity and maintain high standards in accordance with the Code when representing the business and in their day to day engagements. In the same light, we are committed to protecting and respecting the human rights of our employees through internal employment policies and practices. Our employment policy promotes equal opportunity and diversity and inclusion and the commitment to equal opportunity governs decisions related to all aspects of employment, including recruitment, selection, development and compensation. To that end, we ensure that employees are not discriminated against on the basis of their age, sex, nationality, religion or marital status. In addition, Aetna’s compensation philosophy is to reward employees for their contributions to our business success through pay structures that reflect local market conditions. This philosophy ensures that we are positioned to attract, retain and motivate our employees and we also ensure that our employees work in a conducive environment.

- **Contractual protection:** As part of our contracting processes, our legal team seeks to insert “compliance with law” clauses as appropriate into contracts with third parties that we deal with. This is intended to encompass any employment/labor, human trafficking and slavery laws applicable in the jurisdictions concerned. Where appropriate, we endeavor to include specific slavery / trafficking prohibitions.

4. Further Actions

As part of our commitment to addressing modern slavery in our business and supply chains, we have reviewed our policies and procedures to identify any areas of enhancement to further support:

- identification, monitoring and assessment of potential modern slavery risk in our business and supply chains;
- reduction of such risk; and
- reporting of concerns in respect of the same.

As an outcome of this review, over the next 12 months we intend to improve our current controls further by:

- incorporating specific modern slavery checks and contractual provisions within certain third party due diligence and engagement processes; and
- enhancing our internal guidance and the content of our annual training to assist our employees with the identification of modern slavery and our approach in relation to the same.

5. Conclusion

Our management team and the Boards of Directors of our companies have overall responsibility for ensuring that we comply with our legal and ethical obligations (including the above-mentioned policies), and that all staff under our control comply with it. We have procedures in place to monitor compliance with these policies and to identify areas of non-compliance. Non-compliance is assessed and appropriate remedial action (including any external reporting) completed. We are committed to ensuring our employees are able to recognize and respond to the risks of modern slavery in our business and supply chains, and we will continue to review our procedures/ policies to ensure that they adequately support this objective.

This statement is made pursuant to section 54(1) of the Modern Slavery Act 2015 and has been adopted by Aetna Global Benefits (UK) Limited and Aetna Insurance Company Limited as their slavery and human trafficking statement following the financial year ending 31 December 2017.



Damian Lenihan - CEO, Aetna Global Benefits (UK) Limited and Aetna Insurance Company Limited

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