

U.K. Modern Slavery Act Statement

2022

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 applicable laws 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 1,500 staff working across these regions. We provide our products 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:

- **CVS Health Code of Conduct** - Our Code of Conduct is grounded in and reflects the principles of CVS Health Corporation, our ultimate shareholder. 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).
- **CVS Health Human Rights Policy:** We uphold the fundamental principle of human rights and adhere to widely accepted standards of fair treatment and non-discrimination including those set forth in the [Universal Declaration of Human Rights](#), [International Covenant on Economic, Social and Cultural Rights](#) and the [International Labour Organization Declaration on Fundamental Principles and Rights at Work](#). We are committed to respect the human rights of our employees through our internal employment policies and practices as highlighted below. We also seek to encourage behaviour by our suppliers that is consistent with the principles set forth in our human rights policy.

- **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 we conduct several checks at the onboarding stage of a third-party business relationship and annually thereafter to ensure that our suppliers meet certain legal, regulatory and other ethical standards. In the last year, we have also taken steps to incorporate specific modern slavery checks and contractual provisions within our third-party/vendor due diligence and engagement processes.
- **Aetna International Vendor Procurement and Management Policy:** This policy articulates how Aetna mitigates the risk that slavery occurs within our Supply Chain. Vendors are risk rated depending on the size of the contract, their location, and the type of partnership entered into. This dictates and informs the level of ongoing due diligence of that Vendor.

Vendors' procedures are captured to ensure modern slavery risk is managed across the supply chain. As at the publication of this document we have no vendors in countries considered a high risk for modern slavery practices.

- **Aetna International procedures for raising concerns:** We:
 - encourage employees to report suspected wrongdoing as soon as possible, secure in the knowledge that we will take their concerns seriously and investigate them as appropriate, and that we will respect their confidentiality;
 - 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, our 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/labour, human trafficking and slavery laws applicable in the jurisdictions concerned. Where appropriate, we endeavour 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.

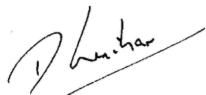
We have also improved our controls further by enhancing our internal guidance and the content of our annual training to assist our employees with the identification of modern slavery and our approach in relation to the same. Staff involved in vendor procurement and management receive specific training.

Additionally, our internal compliance function undertakes an annual review of our Vendor management process. The 2021 review was given a satisfactory rating.

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 our employees comply with it. We have procedures in place to monitor compliance with these policies and to identify areas of non-compliance. We assess non-compliance and complete appropriate remedial action (including any external reporting). 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 Aetna Insurance Company Limited and Aetna Global Benefits (UK) Limited have adopted it as their slavery and human trafficking statement following the financial year ending 31 December 2021.



Damian Lenihan

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

14 June 2022