

# Fennia's human rights commitment

Fennia's human rights commitment.....	1
1 Human rights as part of responsible business.....	1
2 Description of Fennia's business.....	2
3 Human rights principles .....	2
3.1 Respect for international human rights conventions .....	3
3.2 Our operating principles .....	3
4 Interaction with stakeholders and complaint channels .....	4
5 Due diligence and the effectiveness of Fennia's human rights work.....	5
6 Commitment approval .....	6

## 1 Human rights as part of responsible business

Fennia's human rights commitment applies to the entire Fennia Group. Fennia Group (hereinafter referred to as "Fennia") comprises the parent company Fennia Mutual Insurance Company and the Group's subsidiaries.

Fennia influences people and society through its operations. We recognise the equality of all people and respect and promote the implementation of internationally recognised human rights in all our activities as part of sustainable and responsible business. This means, among other things, preventing discrimination and harassment, promoting health and well-being, supporting diversity, equality, inclusion and cohesion, and combating serious human rights violations such as forced labour and human trafficking. We monitor our own activities, those of our suppliers and other partners, as well as those of our customers, and take corrective action if we identify negative human rights impacts.

Fennia's parent company's Board of Directors is responsible for ensuring respect for human rights throughout the Group. The executive management of the Group companies is responsible for the implementation and monitoring of compliance with the policies and principles. The companies' business and support functions are responsible for the practical identification, assessment, management, prevention and reporting of adverse impacts and risks related to human rights. All Fennia employees and partners have a role in ensuring the implementation of human rights.

## 2 Description of Fennia's business

Of the Fennia Group companies, Fennia Mutual Insurance Company specialises in non-life insurance, and Fennia Life Insurance Company offers voluntary life, pension and savings insurance. In addition, Fennia Group includes several real estate companies as well as companies that provide ancillary services, information systems and property rental and management services closely related to the insurance business.

According to its mission, Fennia exists for business and life. Fennia Mutual Insurance Company is a Finnish insurance company owned by its customers, whose history and values are strongly rooted in entrepreneurship. Fennia Mutual Insurance Company provides insurance services to companies, entrepreneurs and households. The company's field of activity includes statutory and voluntary non-life insurance and reinsurance, and the company is engaged in direct insurance business mainly in Finland.

Fennia Life Insurance Company specialises in voluntary life, pension and savings insurance. The company offers its customers insurance cover for permanent disability, serious illness and death, voluntary individual and group pension insurance, savings life insurance, and capital redemption contracts, and engages in this insurance business only in Finland.

## 3 Human rights principles

Fennia's human rights commitment applies to all Fennia employees, management, board members and persons working under Fennia's guidance in all Fennia Group companies. We also expect our partners and customers to respect human rights.

### **3.1 Respect for international human rights conventions**

We are committed to respecting all internationally recognised human rights, and our actions are in line with the values, rights and guidelines set out in the documents below:

- UN Universal Declaration of Human Rights
- UN Guiding Principles on Business and Human Rights (UNGP)
- ILO Declaration on Fundamental Principles and Rights at Work
- OECD Guidelines for Multinational Enterprises on Responsible Business Conduct

Our goal is to run a profitable and responsible business. In terms of human rights, we are committed to continuous learning and operational development as part of doing business. We strive to identify, assess, prevent and mitigate negative human rights impacts in our business. This includes due diligence in our own operations as well as in relation to partners and customers.

We do not accept child labour or forced labour. We respect civil rights, political, economic, social and cultural rights, labour rights, as well as the rights of vulnerable groups. We do not allow any discrimination, harassment or other types of inappropriate behaviour. We are committed to treating all employees and our stakeholders fairly and equally. In the workplace, we promote health, safety and well-being.

### **3.2 Our operating principles**

The ethical practices guiding our operations are described in Fennia's Code of Conduct. All employees, management, the Board of Directors and persons acting under Fennia's direction must comply with these principles. The Code of Conduct also includes key operating principles regarding human rights. We regularly train all our employees on the content of the Code of Conduct and internally monitor compliance with it.

Our partners play an important role in enabling business, and we are committed to developing human rights responsibility in our supply chain as well. We want to build and maintain strong partnerships that help us meet our customers' expectations and needs. Fennia's Supplier Code of Conduct covers the basic ethical and operational responsibility requirements that we require from our suppliers and partners. We require our partners to adhere to the principles defined in the Supplier Code of Conduct and to be responsible for

adhering to them also with regard to their own supply chain. We want our partnerships to support Fennia's strategic goals profitably and responsibly, and we require our partners to respect internationally recognised labour and human rights and ensure that they are not involved in human rights violations.

We also take into account the implementation of human rights as part of our customer selection. Through internal guidelines and processes, we aim to ensure that we promote the identification of adverse human rights impacts and risks related to our customers' activities on a risk basis. Our goal is to contribute to preventing adverse human rights impacts that are within the scope of our business. In its investment activities, Fennia takes human rights into account in accordance with the Principles for Responsible Investment.

If we detect or become aware of human rights violations in our procurement and supply chains or in our customers' operations, we will advise our partners and customers to remedy their actions. If the violations are not corrected or the abuses are serious, Fennia may terminate the cooperation or customer relationship, while taking into account the regulation of the insurance sector. The decisions are made on a case-by-case basis.

## 4 Interaction with stakeholders and complaint channels

Our stakeholders include those who have a moderate impact – including risks and opportunities – on our business or who are affected by our operations, products or services. We collect and utilise feedback from stakeholders in different channels. We listen to the views of our stakeholders and their representatives so that we can more effectively identify our human rights impact and further develop our activities.

All our employees are obliged to report suspected violations of laws, regulations or our internal policies. Reports regarding violations are submitted to Fennia's compliance function. Fennia also has a Whistleblowing channel in accordance with the Whistleblower Protection Act (Act on the Protection of Persons Reporting Violations of EU and National Law 1171/2022), through which Fennia's employees and external stakeholders can report any violations they discover, anonymously if they wish. The Whistleblowing service describes how suspected violations are investigated.

## 5 Due diligence and the effectiveness of Fennia's human rights work

We are committed to the continuous development of our human rights due diligence practices so that human rights are taken into account in all our activities. In our operations, we apply the due diligence guidelines described in the UN Guiding Principles on Business and Human Rights and the OECD Guidelines for Multinational Enterprises on Responsible Business Conduct. Through our due diligence processes and practices, we seek to prevent and mitigate actual and potential adverse human rights impacts.

We have carried out a human rights impact assessment with the aim of identifying and evaluating human rights topics relevant to our operations, as well as key human rights-related actual and potential impacts. Adverse human rights impacts can manifest themselves in our activities in different ways:

- Fennia's own direct actions can cause harmful impacts
- Fennia may indirectly contribute to the creation of impacts caused by third parties
- The cause of the impact may also be in contact with Fennia indirectly through a business relationship or other connection

Human rights risks can be financial, regulatory or reputational in nature, or they may cause operational risks. In addition, long subcontracting chains within the supply chain increase the risk of human rights violations due to the difficulties in operational oversight. Through the assessment, we have identified areas for development and defined the necessary measures to develop our human rights due diligence commitment.

The assessment has increased our understanding of how we can better integrate human rights considerations into our activities. Today, the potential negative human rights impacts of our activities are assessed on a regular basis. Human rights are also included in our risk management process, and we develop the consideration of human rights in our internal guidelines, as well as in the daily processes of our businesses and support functions.

If we detect or become aware of actual adverse human rights impacts arising from our own activities, we are committed to taking the necessary steps to investigate the matter without delay and to handle any violations with care. We are committed to taking action to remedy the damage caused, within the

limits of regulations, and to monitor the effectiveness and appropriateness of the actions taken. If we have contributed to the occurrence of actual adverse impacts, our aim is to take the necessary measures to stop or prevent such contribution, as well as to cooperate with the operator that caused the impact to remedy the matter. We assess any incidents that come to our attention, as well as any necessary and possible remedial actions, on a case-by-case basis, and seek to consult affected stakeholders where necessary. We monitor the effectiveness of human rights management through risk management and potential violations.

Our goal is to ensure that human rights impacts and risks are identified, assessed and managed regularly and systematically as part of our operations. We communicate possible cases as well as key actions taken annually in the sustainability report published as part of Fennia's annual report.

## 6 Commitment approval

The human rights commitment has been approved by the boards of Fennia companies. A review to ensure the commitment is up to date will be carried out every three years or as necessary. The commitment has been approved for entry into force on 5 November 2025.