

# Modern Slavery Statement 2025

## Omnilife Insurance Company Limited

*Provided on a voluntary basis*

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Omnilife Insurance Company Limited (“Omnilife”) is a wholly owned subsidiary of Reinsurance Group of America, Incorporated (“**RGA**”). Omnilife adopts policies and procedures for the eradication of modern slavery that are consistent with RGA, and a Modern Slavery Statement is provided on a group basis.

The Modern Slavery Statement outlines the steps RGA has taken in the year 2025 to address this global issue. RGA and Omnilife are dedicated to ensuring our operations and supply chains are free from modern slavery and human trafficking.

In the following pages, you will find:

- An overview of the RGA and Omnilife business structure and supply chains.
- Our policies in relation to modern slavery.
- Our due diligence processes and the steps we have taken to assess and manage risk.
- Our effectiveness in ensuring that slavery and human trafficking is not taking place in our business or supply chains.
- Our plans for the future and further steps we intend to take to eliminate modern slavery.



Omnilife Insurance Company Limited (Omnilife) is authorised by the Prudential Regulation Authority and regulated by the Financial Conduct Authority and the Prudential Regulation Authority.

Registered in England and Wales (Company No. 2294080). Omnilife is part of the RGA Group of companies. Registered office: Level 45, 22 Bishopsgate, London, EC2N 4BQ.

# Modern Slavery Statement 2025

Reinsurance Group of America,  
Incorporated



# 1. Introduction

At Reinsurance Group of America, Incorporated (“RGA”), we pride ourselves on our continuing dedication to conducting our global business fairly and ethically. We follow a strict equality and fairness ethos and do not tolerate acts of modern slavery and human trafficking.

We are committed to the identification, assessment and elimination of modern slavery and human trafficking risks in our business operations and supply chains. We are similarly committed to working with and encouraging our suppliers, customers and other business relationships to address the risks of modern slavery and human trafficking in their supply chains.

This Modern Slavery Statement covers January 1, 2025 to December 31, 2025.

# 2. Our Structure and Operations

RGA, a Fortune 500 company, is a leading global provider of life and health reinsurance and financial solutions. Founded in 1973, RGA is recognized for its deep technical expertise in risk and capital management, innovative solutions, and commitment to serving its clients with the aim of making financial protection accessible to all.

With headquarters in St. Louis, Missouri, RGA operates in markets around the world, delivering expert solutions in individual life insurance, individual living benefits reinsurance, group reinsurance, financial solutions, facultative underwriting and product development.

As of December 31, 2025 (latest available), RGA had approximately \$4.3 trillion of life reinsurance in force and total assets of \$156.6 billion.

This Statement is made pursuant to Section 54(1) of the UK Modern Slavery Act 2015 and is provided on behalf of RGA and its subsidiaries who carry on business in the UK and meet the statutory requirements, specifically RGA International Reinsurance Company dac (UK Branch), RGA UK Services Limited and Omnilife Insurance Company Limited (“Omnilife”) who is voluntarily part of this Statement (together the “RGA UK Operations”). This Statement has been prepared in consultation with representatives of the RGA UK Operations (further details below under Consultation and Approvals).

# 3. Our Supply Chains

RGA procures goods and services to enable our delivery of life and health reinsurance and financial solutions services to our clients.

During 2025, RGA engaged a number of suppliers and we have identified the following key supply chain categories:

- Professional services (consulting, advisory, professional associations, education and training and for Omnilife only, policy administration services)

- Premises and facilities services (buildings and maintenance and utilities)
- Banking services
- Financial services
- Marketing services
- Travel and accommodation services
- Information technology services (software, hardware, artificial intelligence tools and desktop tools (phones, computers, printers))
- Human resources and staffing services
- Print and mail management (record and data storage, mail, postage)
- Investment management services

## 4. Modern Slavery Risks in our Supply Chains

Given RGA's supply chain relies primarily on external professional services and technology suppliers, the risk of modern slavery or human trafficking in our business or supply chain is low. However, we recognize that certain sectors, locations, services, and products carry higher risks. We address risk on a proportionate, risk-based basis, and we address identified risks through rigorous procurement standards and ongoing monitoring within the organisation.

If RGA identifies that a service provider does not adequately manage human rights impacts, we will reconsider our supply arrangement and implement appropriate remedies. We evaluate each case individually and ensure our workforce is aware of the risks and mitigation measures in place.

## 5. Actions Taken to Assess and Address Modern Slavery and Human Trafficking Risks

RGA has implemented a Corporate Governance framework that is reviewed and approved by the Executive Committee, a group of senior management executives at RGA. This Framework is updated regularly and applied consistently across all global subsidiaries.

### Code of Conduct

RGA's Code of Conduct provides practical rules and standards for conducting business globally. A core value within this is integrity, which requires honesty, fairness, trustworthiness, compliance with laws, and reporting concerns. These values help RGA to address and eliminate modern slavery risks.

All RGA workforce members globally must complete the online Code of Conduct training upon joining and annually, attesting to their understanding and compliance with the rules,

including human rights issues. Non-compliance may result in disciplinary action, up to termination.

To ensure that it is up to date with emerging issues, including modern slavery, RGA's Code of Conduct is reviewed at minimum every two years (with the next review due to take place in 2027) and was last updated in January 2025.

## Speak-Up Policy

RGA's Speak-Up Policy ensures adherence to the highest ethical standards in all its business dealings by encouraging our workforce members to report any violation of law, rule, regulation, policies or the Code of Conduct either online, by phone or by email.

Anonymous reporting through the Speak-Up Policy is available to encourage all workforce members to challenge improper, unethical, or inappropriate behaviour identified within RGA or its supply chains.

Confidential reports are managed by a third party and overseen by RGA. RGA values confidentiality and does not tolerate retaliation.

RGA's Speak-Up Policy is reviewed at minimum every two years (with the next review due to take place in 2026) and was last updated in December 2024.

## Human Rights Policy

RGA is committed to promoting fundamental human rights globally. Our Human Rights Policy outlines expectations for actions and behaviour regarding human rights, including modern slavery and human trafficking, in accordance with laws, regulations, our Code of Conduct and policies.

We provide mandatory training for workforce members about the standards and principles in our Human Rights Policy upon joining and annually thereafter.

RGA's Human Rights Policy is reviewed at minimum every two years (with the next review due to take place in 2026) and was last updated in December 2024.

## Global Procurement Policy

RGA retains accountability for business risks in the business processes that our vendors and suppliers support. Our Global Procurement Policy ensures due diligence and escalates high-risk findings. We expect vendors to adhere to RGA's high ethical business standards (details below under Vendor Code of Conduct).

RGA's Vendor Risk Management Policy is reviewed at minimum every two years (with the next review due to take place in 2026) and was last updated in February 2024.

## Vendor Code of Conduct and Vendor Contracts

RGA expects all new and existing vendors to adhere to the Vendor Code of Conduct and to continuously improve processes. Vendors are requested to acknowledge their compliance with the Vendor Code of Conduct.

The Vendor Code of Conduct requires our vendors to protect human rights and compliance with slavery, forced labor and human trafficking laws; alignment with the United Nations Universal Declaration of Human Rights and the UK Modern Slavery Act 2015; and adherence to minimum legal working age laws. It also requires vendors to conduct business in accordance with all applicable laws and regulations.

RGA has a risk-based approach to performing due diligence on its suppliers at the point of entering into a new relationship and on an ongoing basis. Where appropriate, a clause is included in contracts to require suppliers to take reasonable measures to prevent modern slavery and human trafficking in their supply chains.

RGA's Vendor Code of Conduct is reviewed at minimum every two years (with the next review due to take place in 2027) and was first published in October 2023.

## Anti-Money Laundering Policy

RGA has a lower exposure to anti-money laundering (AML) requirements due to acting primarily as a reinsurer. However, we take our responsibilities to comply with all financial crime requirements seriously and so implement an AML Policy to assist in the prevention of activity that may facilitate money laundering, proliferation financing or the funding of terrorist or criminal activity, including modern slavery and human trafficking.

We provide mandatory training for workforce members on the AML Policy upon joining and annually thereafter.

RGA's Anti-Money Laundering Policy is reviewed at minimum every two years (with the next review due to take place in 2026) and was last updated in December 2024.

## 6. Assessing the Effectiveness of Our Actions

RGA acknowledges that assessing the effectiveness of our actions is ongoing. We regularly monitor our policies and procedures to address modern slavery and human trafficking risks.

During the 2025 reporting period no material incidents or increased risks were identified within our immediate supply chains. We will continue to collaborate with suppliers and external partners to identify and address modern slavery and human trafficking risks within our supply chains.

## 7. Looking Ahead

As part of RGA's ongoing commitment to addressing modern slavery and human trafficking risks in our operations and supply chains, we intend to:

- continue developing our supplier due diligence and procurement framework; and
- continually improving identification and management of modern slavery and human trafficking risks and raising awareness of human rights measures in our governance framework and in RGA policies.

## 8. Consultation and Approvals

This Statement was prepared by representatives from RGA, in consultation with UK Managing Directors, and input from Legal, Risk & Compliance, Procurement, Human Resources, Corporate Responsibility & Sustainability, and Talent Acquisition & Inclusion functions.

This statement was approved by the RGA Sustainability Leadership Committee on May 21, 2026.

Signed

A handwritten signature in black ink, appearing to read 'Ray Kleeman', with a long horizontal line extending to the right.

Ray Kleeman

Executive Vice President and Chief Human Resources Officer  
Reinsurance Group of America, Incorporated