



# Respecting Human Rights

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March 24, 2026

## Our commitment

Sun Life is committed to respecting human rights in our operations, products and services, and relationships. Our commitment is grounded in Sun Life’s Purpose - to help our Clients achieve lifetime financial security and live healthier lives.

Our approach is guided by the United Nations Guiding Principles on Business and Human Rights.

This document summarizes the principles and actions that bring our commitment to respecting human rights to life for our Clients, employees, suppliers and communities.

## Human Rights Principles

Our commitment to respecting human rights is reflected in four core principles<sup>1</sup>:

1. We commit to **respecting** Human Rights across our business
2. We are all **accountable** for respecting Human Rights
3. We seek to **understand and address** our Human Rights impacts
4. We are committed to **transparency** on our Human Rights approach

These principles are supported by policies and practices addressing topics such as fair and ethical employment practices, health and safety, harassment and discrimination, and procurement across our global operations.

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<sup>1</sup> For Sun Life Financial Inc., inclusive of Sun Life Canada, Sun Life US, Sun Life Asia, and investments in Sun Life’s general account, the management approach to respecting human rights is reflected in Human Rights Principles. These principles do not apply to the Corporation’s asset managers. Sun Life’s asset managers have their own approaches to human rights, given the unique nature of each asset manager.

# Our approach

## Governance

The Governance Committee of the Board of Directors assists the Board with oversight of sustainability matters, which includes material issues relating to human rights. The Board of Directors approves the enterprise strategic plan annually, and the Governance Committee of the Board of Directors receives periodic updates on progress against Sun Life's sustainability strategy and goals included in the strategic plan. The Executive Sustainability Council (a subset of the Global Leadership Team which consists of our Chief Sustainability Officer along with eight members of our Global Leadership Team, including our Chief Executive Officer) is the decision-making body for the approval of sustainability goals and progress oversight and approval of cross-enterprise sustainability programs and issues management. These activities include oversight of human rights-related matters, where appropriate. Our Chief Sustainability Officer has responsibility for strategic initiatives to further our human rights practices.

Our approach to identifying and managing environmental and social risks, including human rights risks, is embedded within our enterprise Risk Management Framework. As such, human rights risks are integrated into our risk governance processes, which are overseen by the Risk Committee of the Board of Directors.

## Due diligence

We assess potential human rights risks across our operations and value chain to identify and prioritize the most salient human rights issues for our business. Through analysis, workshops and targeted assessments, we seek to identify any actual or potential impacts on our employees, products and services, supply chain and investment activities. This prioritization informs action plans to address any gaps or areas for improvement.

## Products and services

We ensure all products comply with applicable legislation. Sun Life actively works to expand access to insurance and wealth products designed to empower and educate Clients, supporting their long-term

economic security and financial resilience. Respecting the privacy of our Clients is critical to maintaining our reputation as a trusted and responsible business and we are guided by Sun Life's Client Data Privacy Principles.

## Employees

Our commitment to acting with integrity is set out in our [Code of Conduct](#) (the Code). The Code outlines our standards and expectations to act with honesty, integrity, and professionalism in all that we do. Sun Life promotes equal opportunity, actively works to safeguard employee health and strives to enhance employee well-being. Sun Life implements specific practices including regular reviews to maintain fair compensation, enforces responsible health and safety practices. Sun Life is committed to protecting the privacy and confidentiality of all personal information about our employees.

## Supply chain

Sun Life addresses human rights in its supply chain, recognizing that responsible oversight prevents indirect contributions to human rights violations while promoting improved working conditions. Our high standards of integrity and legal compliance for our business partners are reflected in our [Supplier Code of Conduct](#). The Supplier Code of Conduct outlines human rights expectations for all our suppliers, and we assess our critical suppliers annually for alignment.

## Investments

Sun Life requests that its asset managers integrate relevant and material human rights considerations into the investment decision-making process for Sun Life's General Account assets, to the extent data is available. The majority of Sun Life's General Account assets are managed by its affiliated asset management business, SLC Fixed Income, which employs tailored methodologies across different asset classes to evaluate sustainability-related risks and opportunities. For public and private fixed income investments, SLC Fixed Income uses an industry and asset type-level sustainability risk assessment framework to evaluate material sustainability-related factors, which may include factors relating to human rights risks and opportunities, where relevant.



## Grievance mechanisms and reporting

We encourage our employees and stakeholders to speak up if they observe any conduct inconsistent with our human rights commitments. Sun Life offers a variety of avenues for speaking up, including an [Ethics Hotline](#). Sun Life takes breaches of its Code of Conduct seriously, and all allegations raised are escalated appropriately within Sun Life for review. We strictly prohibit any form of intimidation or retaliation against anyone who speaks up and raises a concern. Any breach of the Code that violates the law may also result in administrative, civil, or criminal proceedings. We report on aspects of our human rights approach, and other material topics relating to human rights, in our annual [Sustainability Report](#) and on our [website](#).

## Conclusion

Respecting human rights is an ongoing journey. Sun Life is committed to advancing our approach and continuous improvement on this journey – for our people, our Clients, and the communities we serve – as part of being a trusted and responsible business.

For more information, refer to our [Sustainability Report](#) and our [website](#).