

## Modern Slavery in Australia

This statement is prepared for the purposes of the *Modern Slavery Act 2018* (Cth) (the Act). This statement outlines what Auto & General Insurance Company Ltd, (AGIC) (ACN 111 586 353) and its related entities, in the Australian insurance operations have done during the 2022 financial year to assess and address the risks of modern slavery in our supply chains and operations.

The related entities of AGIC that are covered under this statement are, Auto & General Holdings Pty Ltd (AGH) (ACN 086 321 459), and Auto & General Services Pty Ltd (AGS) (ACN 003 617 909) (AGIC Group).

The Board of AGIC has responsibility for overseeing AGIC's response to modern slavery risks.

## About AGIC

The AGIC Group has sold, managed and underwritten a range of insurance products in Australia since 2000.

AGIC is regulated by the Australian Prudential Regulation Authority (APRA), and we operate under an Australian Financial Services Licence granted by the Australian Securities Investment Commission (ASIC).

We are also a member of the Insurance Council of Australia and a signatory to its General Insurance Code of Practice.

We market insurance Australia-wide. Our main offices are in Toowong, Brisbane and our call centres are based in South East Queensland and Johannesburg, South Africa. We operate damage assessment centres, located in Sydney, Melbourne and Brisbane.

We employ over 1,900 people, including underwriters, product managers, actuaries, call-centre consultants (covering sales service and claims), IT staff, business developers, account managers and marketing and communication specialists.

As a company, we utilise the services of over 800 suppliers and service providers. Our supply chain includes the contracting of claims related services including repairers and builders as well as IT services.

AGIC does not own any factories or manufacturing processes to source materials or supplies used in repairs. In our supply chain we utilise the services of less than 200 repairers and builders all operating within Australia to deliver their services, such as motor and home repairs and restorations. These suppliers are required to source raw materials to undertake repair works. These repairers and builders are fundamental to AGIC's core business, and also support the employment of many staff across Australia.

We also use services of IT service providers, which operate through staff based overseas.

## Risk of Modern Slavery in Our Operations and Supply Chains

All of the entities covered by this statement operate in the Insurance industry. This industry has a minimal risk of modern slavery practices.

The assessment of risk is based on the services we provide, the location of our businesses and our suppliers' businesses and the fact that our industry is highly regulated.

However, there is potentially some risk relating to outsourcing within our supply chain stemming from (a) our builders and repairers (both home and motor) and (b) some of our IT service providers. In these situations, AGIC does not have clear supervision over where these suppliers ultimately source raw materials from to undertake repair works and/or the conditions of employment of third parties' IT staff located overseas.

As such, the raw materials used in the goods and services provided by our builders and repairers may be produced outside of Australia in industries with higher risks of modern slavery. Furthermore, offshore staff working for our IT service providers may also be based in jurisdiction with higher risks of modern slavery.

Separately, AGIC's People & Culture division monitors and addresses human rights issues in their operations and through employment recruitment practices. A proportion of the workforce are employed via enterprise agreements, which ensures minimum pay and entitlements. AGIC also has a number of

internal policies in place that promote equality, safety, and anti-discrimination.

While these factors may not be indicative of a modern slavery risk, AGIC acknowledges the potential for labour rights issues. Accordingly, AGIC places emphasis on providing safe workplaces and consistently aspires to improve.

## Our Actions in Assessing These Risks in Our Operations & Supply Chains

This year we have continued focussing on developing our internal processes to allow AGIC to continue to apply due diligence processes in future, with the aim of identifying and remedying any potential risks in our operations and supply chains. This has focussed on increased front-end vendor management via contractual terms and further developing our compliance program for future years.

### Modern Slavery Contract Terms

There are a number of factors that inform which suppliers AGIC chooses to partner with throughout the procurement process. These include quantitative factors such as price, quality, industry experience and availability of resources, in addition to ensuring a cultural alignment in key areas such as business values, labour practices and industry best practice.

To ensure that we will be complying with the requirements of the Act we have developed contractual terms relating to modern slavery which we are now using as the standard in the procurement of new services.

The terms have the effect of ensuring our contractors commit to compliance with the Act but also place an onus on them to ensure their contractors and suppliers comply with, at minimum, these same terms.

The terms continue to be rolled out with new suppliers and in renewal contracts with existing suppliers.

### Modern Slavery Training

We are placing an emphasis on modern slavery education of our staff and customers. This

includes development of mandatory internal training to assist all AGIC employees in understanding their obligations and aiding them to identify conduct that may raise a modern slavery risk. The eLearning module was designed during the 2022 financial year and implemented in August 2022.

### Modern Slavery Public Statement

AGIC has committed to making a publicly available statement of business ethics which outlines AGIC's attitude towards modern slavery practices and its' commitment to human rights. The statement is available via our website for customers to access. It is intended that the statement will aid customer understanding of the topic and emphasise AGIC's commitment to ethical business practices.

### Modern Slavery Monitoring

In terms of monitoring, we have developed a process to assess risks and determine any changes to our key supply chains, with a targeted focus on high expenditure suppliers.

An updated modern slavery questionnaire was issued to identified suppliers during the 2022 financial year, to ensure suppliers have adequately considered their supply chains and modern slavery risk.

The responses were analysed by Compliance and an overall risk rating applied to each supplier and service provider. No high risk suppliers or service providers were identified as a result of the questionnaire.

### Modern Slavery Policy and Guideline

During the 2022 financial year, a Modern Slavery (Anti-Slavery) Policy and Guideline was developed. It outlines how AGIC complies with its modern slavery obligations, details the requirements for the annual supplier and service provider risk assessment and ongoing training requirements, and how AGIC will address any modern slavery risk presented in its business. The Policy was approved by the AGIC Board in October 2022 and, along with the associated Guideline, will be communicated company-wide during the current financial year.

In addition to the Policy and Guideline, an onboarding risk assessment for suppliers and service providers has also been developed and will be implemented during the 2023 financial year,

## Whistleblowing Policy

We have a Whistleblowing Policy available via our website promoting a work environment that encourages and allows employees to operate with ownership and integrity and feel safe raising matters of concern in our business. This promotion of ethical behaviour applies to our direct employees, contractors and third-party representatives of AGIC and its related entities.

We have developed a stringent yet welcoming reporting process, protecting any person disclosing information, and encouraging transparency in our business. Any risk of modern slavery in our operations can easily be reported, assessed and rectified using this procedure.

## Effect of COVID-19

Due to COVID-19, there has been an impact on supply chains within our motor and home repair space, due to the availability of parts and raw materials. We acknowledge there may be an increased risk of modern slavery in our operations and supply chains due to this and because of the economic uncertainty as a result of the pandemic.

Widespread lockdowns have meant we have been unable to undertake many of the usual face to face contacts with our suppliers. Whilst we were unable to meet face to face as often as desired, we have continued to maintain regular contact with suppliers via alternative means which creates opportunities for suppliers to raise concerns, including with respect to any modern slavery risks.

## Assessing the Effectiveness of Our Actions

In completing this statement, we have detailed key actions taken by our business in and around assessing and minimising the risk in our operations and supply chains. Using these learnings will be vital in ensuring continuous

improvement is adopted and to further assess the effectiveness of our actions to date.

To date, the inclusion of new contractual terms has raised awareness of the Act with our service providers, the vast majority of which do not have reporting obligations of their own. This has resulted in a greater level of understanding as to what potential practices may attract modern slavery risks.

Results from our second round of supplier monitoring undertaken in the 2021 2022 reporting period, assisted in the development of the Policy and Guideline, enabling a formal risk assessment process to be documented for use annually. We expect the Guideline to evolve over time, refining our approach and continuing to ensure we can identify and remediate any potential future modern slavery risks.

Many of the actions proposed for the forthcoming financial year aim to improve and expand on the work undertaken to date, by creating greater awareness at an AGIC Group level of the modern slavery risks.

## Engaging All Our Entities

In preparation of this statement we have sought input of all entities covered in this joint statement.

This statement has been reviewed by all of the related entities mentioned and has taken on board the actions of those entities to ensure that they have been engaged in its completion.

All related entities of AGIC operate in the same industry and have similar exposure to the risks of modern slavery. The actions and consultation taken by each entity has been reflective of the relationships in the AGIC Group and the risk profiles of those entities.

## Approval of statement

This statement was made in compliance with the *Modern Slavery Act 2018* (Cth) for the reporting period of 1 July 2021 to 30 June 2022.

This statement was approved by the Board of Directors of AGIC, being the principal governing body for the AGIC Group, on 14 October 2022.



**Ram Kangatharan**

Group Managing Director & CEO Asia Pacific  
Auto & General Insurance Company Ltd