

# **CEO** Introduction

As the CEO of specialist agricultural insurer Achmea Farm Insurance, I am proud to lead an organisation that is dedicated to its purpose of keeping farmers farming while upholding the highest standards of human and labour rights. With a vision of protecting and enhancing a sustainable future for agricultural communities, we are committed to protecting human and labour rights, along with promoting equal opportunities, diversity and inclusiveness.

Achmea Farm Insurance's approach to human rights is guided by the United Nations Guiding Principles on Business and Human rights (UNGP), that are based on the 'Protect, Respect, Remedy Framework'. These principles provide a global standard for preventing and addressing the risk of adverse human rights impacts linked to business operations.

In alignment with the International Labour Organisation (ILO) Declaration on Fundamental Principles and Rights at Work, Achmea Farm Insurance prioritises the rights of workers in its business relationships, advocating for the provision of a living and fair wage as a fundamental aspect of decent work to ensure the wellbeing and dignity of all workers, families and communities.

We continually strive to enhance and improve our processes, empowering our employees to address human and labour rights in our business practices through collaboration with all stakeholders, including clients and suppliers. The eradication of modern slavery is a responsibility we take seriously, and in this statement, we outline our approach to achieving this commitment.

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**Emma Thomas** CEO



Modern Slavery Statement 2024

### Farm Insurance

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### Overview

This Modern Slavery Statement ("Statement") is made pursuant to the Modern Slavery Act 2018 (the "Act") by the Australia Branch of Achmea Schadeverzekeringen N.V. (ARBN 158 237 702, "Achmea" or "Achmea Farm Insurance"), a reporting entity under the Act.

This Statement details the measures taken by Achmea Farm Insurance to identify, assess and address modern slavery risks within its operations and supply chains during the financial year from 1 January 2024 to 31 December 2024.

This Statement addresses the seven mandatory criteria for modern slavery statements set out in section 16 of the Act and makes reference to Achmea Group's Human Rights and Labour Rights Statement, which is available from <a href="http://www.achmea.com/en/sustainability">www.achmea.com/en/sustainability</a>.



### About Achmea Farm Insurance

#### **Our Structure**

Achmea Schadeverzekeringen N.V. is a legal entity established under the laws of the Netherlands with its registered office in Apeldoorn, the Netherlands. Achmea Schadeverzekeringen N.V. is part of the Achmea Group of companies, a financial services organisation with operations in the European Union, Canada and Australia (www.achmea.com).

Achmea Schadeverzekeringen N.V. operates as a branch in Australia and is registered as a Foreign Company under Australian Registered Body Number (ARBN) 158 237 702.

On a day-to-day basis Achmea Farm Insurance is operated and managed locally by the Executive Leadership Team. The ultimate responsibility, including the branch's conduct lies with the Senior Officer Outside Australia (SOOA). The SOOA is appointed by the statutory directors of Achmea Schadeverzekeringen N.V. and has delegated authority to fulfil this role.

#### **Our History**

The Achmea Group was established more than 200 years ago when 39 farmers put money into a glass jar, to be compensated in case one of them had a 'Hooibroei', a haystack fire. Those 39 farmers, 200 years ago, supported each other and worked together to minimise the risks and threats faced by each other's farms, not just their own. Their commitment to a co-operative approach to insurance remains alive and well in Achmea today. Achmea Farm Insurance's strong growth as a specialist agricultural insurer shows that we are actively responding to societal changes, whilst adhering to the same co-operative principles we started with that we can achieve more by working together.

#### **Our Operations**

Achmea Farm Insurance is an authorised general insurer under the Insurance Act 1973, providing general insurance to Australia's agricultural sector. Through its All-in-One Farm Pack, Achmea Farm Insurance offers general insurance cover for farmers' homes, contents, (agricultural) buildings, inventory, motor vehicles and farm equipment, business interruption and general liability. In addition to the All-in-One Farm Pack, Achmea Farm Insurance offers Stud Stock Insurance and Farm Fleet Insurance.

Employing approximately 130 employees throughout regional and metropolitan communities in Australia, Achmea Farm Insurance contributes to the Australian economy as a regional employer and an active promoter of regional affairs.

#### **Our Supply Chains**

Achmea Farm Insurance's supply chain encompasses diverse arrangements, ranging from one-off purchases with noncontracted suppliers to multi-year contracts and partnerships. While most suppliers are based in Australia and the USA (IT related services), Achmea Group in the Netherlands also plays a role as a service provider to Achmea Farm Insurance.

The main categories of Achmea Farm Insurance's suppliers (in term of dollars spent) include:

- Building, engineering and repair companies related to insurance claims
- Financial services including reinsurers and banks
- Information technology and telecommunications
- Professional services including travel and accommodation suppliers
- Property and facilities management
- Marketing services

# Modern Slavery in our Operations and Supply Chains

The UNGPs guides Achmea Farm Insurance's understanding of how we may 'cause', 'contribute to' or be 'directly linked' to adverse human rights and impacts through our operations and business relationships, including our own operations and supply chains.

#### Risks of involvement in modern slavery

The risks of a company being subject to involvement in modern slavery can be characterised as:

- A company may cause modern slavery if its own activities result in a modern slavery impact.
- A company may contribute to modern slavery if its activities significantly contribute to modern slavery caused by another party, including acts or omissions that may facilitate or incentivise modern slavery.
- A company may be directly linked to modern slavery if the impact is directly linked to its operations, products or services by its business relationships. Direct linkage may occur even where there is no direct contractual relationship.

#### **Risks in our Operations**

As an Australian financial services provider with a professional workforce, the risk of modern slavery within Achmea Farm Insurance's operations is deemed to be low. Due to the nature and complexity of the business providing general insurance services, Achmea Farm Insurance acknowledges the potential indirect involvement in modern slavery through its clients, who use our general insurance services.

Given that Achmea Farm Insurance's clients and their professional workforce are primarily based in Australia, this risk is further mitigated, however we remain vigilant in ensuring this risk remains low.

#### **Risks in our Supply Chain**

In assessing the risks within our supply chain, we have determined most of our suppliers are based in Australia, with some suppliers in the USA (IT related services) and Achmea Group in the Netherlands. As such, we consider the risk of modern slavery within our direct supply chain also to be low.

In reviewing recognised rankings of high-risk sectors, such as Walk Free's Global Slavery Index (GSI) and the Commonwealth Modern Slavery Act Guidance, we have identified potential exposure in the following sectors: computers and mobile phones; cleaning services and, to a lesser extent; marketing material and uniform suppliers. To date, through our due diligence, we have not identified major exposures within our supply chains to high-risk countries (as defined by GSI). Notwithstanding this, we will continue to develop our risk assessment methodology to ensure these risks are appropriately identified and considered on an ongoing basis.



### Mitigating Actions and Effectiveness Assessment

Achmea adheres to Achmea Group's Statement on Human Rights and Labour Rights at <u>www.achmea.com/en/sustainability</u>. This statement reflects Achmea Group's commitment to human rights and labour rights and sets out its approach to human rights and labour rights in its various roles as: employer, financial services provider, business partner and investor, and as corporate citizen. This overarching obligation flows through to a range of (Group) policies and practices described below, which help to reduce the risk of modern slavery within our operations and supply chains.

Achmea Farm Insurance has assessed Achmea Group's Statement on Human Rights and Labour Rights to identify whether localisation was required to address any modern slavery risks specific to our Australian operations, supply chain and clients. We have retained the Statement on Human Rights and Labour Rights Global as the assessment confirmed that the key drivers, such as the risks to Human Rights and Labour Rights for Modern Slavery Risk, apply locally.

### Our Employees

#### **Modern Slavery Awareness**

Throughout 2024, we continued uplifting the capability of employees in supplier-facing and client-facing roles to identify and manage modern slavery risks. We have increased awareness on sustainability topics including modern slavery high risk industries and countries to identify, mitigate, manage and report on modern slavery risks in their roles. During 2024 we developed training material on modern slavery that is now offered to our staff. This training will be made mandatory in 2025 for our commercial staff, with client-facing roles.

#### **Code of Conduct**

The conduct of Achmea Farm Insurance's employees is governed through its SOOA-approved Code of Conduct. Whilst this Code of Conduct currently does not explicitly reference human rights and labour rights, it prescribes that employees must comply with general ethics of conduct such as respect, honesty, fairness, and empathy. The Code of Conduct is up for review in 2026 and will then also be updated to specifically address human rights and labour rights and consider the impact of modern slavery risks. As part of the employee onboarding process, new employees are required to confirm in writing that they will comply with the Code of Conduct.

#### Whistle-blowing policy

Achmea Farm Insurance is committed to maintaining a high standard of business ethics and safety within its organisation. We promote a strong culture of transparency and integrity, and we are committed to identify and addressing misconduct and ensuring that those who become aware of misconduct can report it without being concerned that it will negatively affect them or their positions. To support this commitment, our Whistle-blowing policy protects individuals and groups of individuals that speak up' about misconduct and sets out how we will respond to reports of misconduct.

Our Whistle-blowing policy covers anyone who is or was an employee of Achmea Farm Insurance, in any role, location, or contract term, as well as anyone who has or had another type of business relationship with Achmea (e.g. associates and suppliers), and family members of current or past employees of Achmea.

#### Banking, Finance and Insurance Award

Employees on our payroll are covered by the Banking, Finance and Insurance Award. Employment contracts are updated as and when new Award changes are introduced to ensure we adhere to the new requirements. We are a fair employer that respects



human rights and labour rights, that is dedicated to promoting decent work and provides an adequate living and fair wage that is sufficient to afford a decent standard of living for our employees and their families. We offer equal opportunities for all workers, are committed to equal remuneration and encourage diversity and inclusion.

### Our Clients

Our financial services operations include providing insurance to farmers who play a role in the agricultural supply chain. This may indirectly expose Achmea Farm Insurance to modern slavery risks.

Certain agricultural sectors may be a higher-risk area for Achmea Farm Insurance due to the seasonal nature of workforce requirements. These businesses often rely on transient, short-term contract manual labour to manage their peak periods. We continue to improve awareness of modern slavery risks across the organisation and more specifically with client facing employees. Where poor labour practices are identified by our employees, we will address these concerns directly with the relevant client.

#### **Client screening**

Like other criminal conduct, modern slavery is often associated with the risk of financial crime including money laundering and the funding of terrorism and criminal activities. We have policies and mandatory procedures in place to conduct a due diligence on our clients at the time of onboarding and on an ongoing basis throughout their general insurance relationship with us. We collect information from our clients and ensure that we verify their identities. We risk assess each client based on the information provided by them and other publicly available sources.

#### Protecting data and privacy of our clients

Achmea Farm Insurance aims to deliver excellent client service. New technologies and digitalisation enable us to become more relevant in the lives of our clients. Apart from the benefits that these developments bring, clients want and need their personal information to be protected. Achmea Farm Insurance respects and is committed to protecting client data with ongoing (IT)security policies and measures. Achmea Farm Insurance's Privacy Policy describes how we process and protect client data in compliance with applicable data protection and privacy laws.

#### Product disclosure statement

As part of our liability cover on the All-in-One Farm Pack, a client can take insurance cover for legal liability claims for compensation for personal injury to a worker hired by or seconded by the client by a third-party labour company. This cover will, amongst other limitations, only come into effect if the labour hire company is compliant with the Modern Slavery Act 2018. Where the Act does not apply (for example because the company falls below the threshold set in the Act), we will provide cover only if the labour hire company is a member of the Recruitment and Consulting Services Association Australia and New Zealand.

### **Our Suppliers**

All third-party suppliers for Achmea Farm Insurance are subject to due diligence prior to on-boarding. All suppliers are also subject to a screening process, including sanction checking, as well as adverse media and politically exposed persons screening and credit rating for financial services. Ultimate beneficial owners of a supplier are also subject to sanction checking.



# Modern Slavery Statement 2024

**Farm Insurance** 

During 2024 we uplifted the procurement process to create awareness for modern slavery at our suppliers. For new and renewed contracts, it is now mandatory to include clauses that make adherence to the Modern Slavery Act 2018 mandatory. This process will continue in 2025 at renewal of existing contracts. Furthermore, our Marketing team has taken proactive steps to evaluate modern slavery risks when sourcing merchandise material, reinforcing our commitment to ethical procurement practices. The above screening process is repeated annually for suppliers with whom Achmea Farm Insurance has an active ongoing relationship. This due diligence process helps us to identify and mitigate modern slavery risks related to our suppliers.



### Consultation on process

This Statement has been considered, supported and approved by Achmea Farm Insurance's Executive Leadership Team and SOOA, demonstrating our commitment to effectively manage and address modern slavery risks within our operations and supply chains.

To identify and manage modern slavery risk, we work collaboratively within the business to share information and tools.

Modern slavery progress including the preparation of this Statement is regularly discussed in Achmea Farm Insurance's Executive Leadership Team and Business Leadership Team meetings.

We continue to work closely with our counterparts at Achmea Group to share learnings and best practices reporting for addressing modern slavery reporting where similar legislation exists.

This Statement is reviewed and updated annually.

This statement was approved by Senior Officer Outside Australia Robert Otto in his role as principle governing body of Achmea Farm Insurance on 26 March 2025.

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**Emma Thomas** Chief Executive Officer Achmea Farm Insurance

**Robert Otto** Senior Officer Outside Australia Member of Achmea Group's Executive Board



### Appendix 1

### Mandatory Reporting Criteria

This Achmea Farm Insurance 2024 Modern Slavery Statement has been prepared in accordance with the mandatory criteria set out in the Modern Slavery Act 2018. The following table references the content in this Statement which complies with Section 16 of the Act.

Australian Modern Slavery Act 2018 Mandatory Criteria	Page reference
Identify the Reporting entity	3
Describe the structure, operations and supply chains of the reporting entity	4
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls	5
Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes	6-8
Describe how the reporting entity assesses the effectiveness of such actions	6-8
Describe the process of consultation with any entities that the reporting entity owns or controls	9
Include any other information that the reporting entity, or the entity giving the statement, considers relevant	6-8