



# Modern Slavery Statement

Financial Year 2022

This statement has been authorised by the Board of:  
**Insurance Australia Group Limited, 22 November 2022.**

ABN 60 090 739 923

# Contents

|   | Page | Requirement* |
|---|------|--------------|
| CEO's Introduction  | 1    |              |
| About our Statement   | 2    | #1           |
| Our Organisation and Corporate Structure  | 3    | #2           |
| Understanding the risks of Modern Slavery practices in our operations and supply chains | 5    | #3           |
| Actions taken to assess and manage our Modern Slavery risks                             | 7    | #4           |
| Actions taken to address our Modern Slavery risks                                       | 8    | #4           |
| Assessing the effectiveness of our actions  | 12   | #4, #5, #6   |
| Looking forward   | 14   |              |

**\* Modern Slavery Act 2018 (Cth) Reporting Requirement:**

- #1 Identifying the reporting entity
- #2 Structure, operations and supply chains
- #3 Risks of modern slavery practices in your operations and the supply chains
- #4 Actions taken to assess and address modern slavery due diligence and remediation processes
- #5 How you assess the effectiveness of the actions taken
- #6 The process of consultation with entities owned and/or controlled by you
- #7 Any other information that you consider relevant

# CEO's Introduction

---

**At IAG, we are committed to meeting customer and community expectations, demonstrating the highest standards of business ethics and managing our relationships in a transparent and responsible manner.**

We recognise that we have a responsibility to manage the environmental, social and governance risks and opportunities impacting our business. As a large financial institution, we focus on the risks in our operations, as well as in our value chain and investments.

We support the need for change and increased corporate accountability, including greater transparency and accountability for the management of human rights within organisations, operations, supply chains and investments. Our key Modern Slavery achievements during the FY22 Reporting Period include:

- Updated IAG's Group Risk Appetite Statement with Modern Slavery risk considerations.
- Integrated Modern Slavery criteria into IAG's risk management platform, activating the module across our corporate supply chains.
- Developed specific risk assessment tools such as our data & analytics Modern Slavery Dashboard.
- Refresh of our Responsible Sourcing strategy and operating model.
- Set up a protocol for supply chain deep dives for FY22–FY23.
- Delivered Modern Slavery Master Classes to targeted audiences.
- Collaborated with industry peers on Modern Slavery.

We are committed to playing our role in respecting human rights and supporting the eradication of all forms of Modern Slavery.

This joint Statement has been reviewed and approved by the Board of Insurance Australia Group Limited on behalf of itself and each Reporting Entity on 22<sup>nd</sup> November 2022.



**Nick Hawkins**

Managing Director and CEO, IAG  
December 2022



# About our Statement

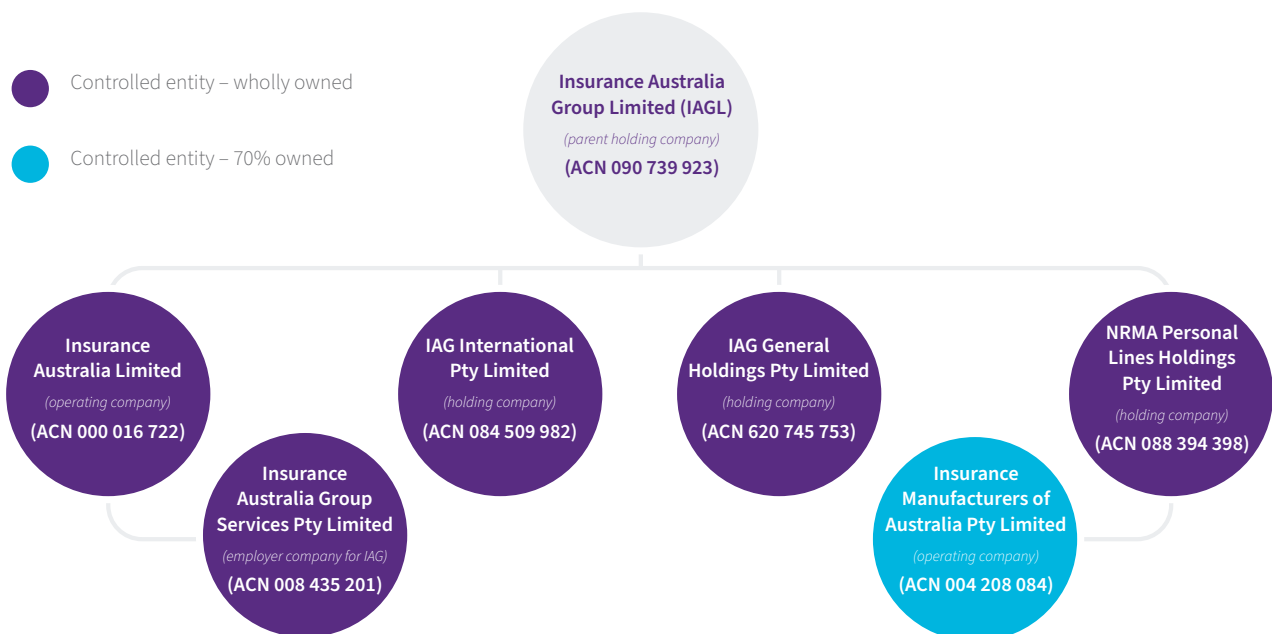
Insurance Australia Group Limited (IAGL) has prepared this Modern Slavery statement (Statement) as a joint statement covering Insurance Australia Group Limited (IAGL) and the other reporting entities listed in the diagram below (together, IAG or the Reporting Entities) in compliance with the *Modern Slavery Act 2018 (Cth)* (the Act). This is IAG’s third Statement and covers the reporting period 1 July 2021 to 30 June 2022 (Reporting Period) for IAG.

This Statement explains actions we have undertaken to date to identify, assess and remediate Modern Slavery risks in our operations, supply chains and investments.

This Statement uses the Act’s definition of Modern Slavery – in summary, this means, conduct which would constitute a criminal offence under Australian law<sup>1</sup> or international law including trafficking in persons<sup>2</sup> and the worst forms of child labour.<sup>3</sup> The worst forms of child labour means the serious exploitation of children, including through enslavement or exposure to dangerous work.

The Reporting Entities covered by this Statement are set out below and include majority-owned and/or controlled subsidiaries of those entities that meet the definition of reporting under the Act.

References to ‘our’ and ‘we’ in this Statement are references to the Reporting Entities below. This Statement describes practices that are common to the Reporting Entities and to subsidiary entities owned and/or controlled by the Reporting Entities.



<sup>1</sup> An offence under Division 270 or 271 of the Criminal Code.

<sup>2</sup> Trafficking in persons as defined in Article 3 of the Protocol to ‘Prevent, Suppress and Punish Trafficking in Persons, Especially Women and Children’, supplementing the United Nations Convention against Transnational Organized Crime, adopted in New York on 15 November 2000 ([2005] ATS 27).

<sup>3</sup> Child Labour as defined in Article 3 of the ILO Convention (No. 182) concerning the ‘Prohibition and Immediate Action for the Elimination of the Worst Forms of Child Labour’, adopted in Geneva on 17 June 1999 ([2007] ATS 38).

# Our Organisation and Corporate Structure

## About us

IAG is the largest general insurance company in Australia and New Zealand. The company underwrote approximately \$13.3 billion of premium in FY22. We have operations in Australia, New Zealand, and Singapore.

IAGL is a public company incorporated in Australia, headquartered in Sydney, Australia. It is listed on the Australian Securities Exchange (ASX) and is a constituent of the S&P/ASX 50 index. Each of the Reporting Entities are also incorporated in Australia with registered offices in Sydney. Insurance Australia Limited is a public company and the other Reporting Entities are proprietary companies.

We employ >**13,000** people across the Group, including permanent employees, casual employees and workforce contractors across Australia, New Zealand, and Singapore.<sup>4</sup>

## Our brands and operations

Insurance Australia Group Limited is the parent company of a general insurance group with controlled operations in Australia, New Zealand and Singapore. Our businesses provide a wide range of general insurance products to protect the homes, motor vehicles, lifestyles, and businesses of our millions of customers.

- In **Australia** – IAG operates brands including NRMA Insurance, CGU, WFI, Swann Insurance, ROLLiN', SGIO, and SGIC.
- In **New Zealand** – IAG operates under the State, NZI, AMI and Lumley brands.
- In **Asia**<sup>5</sup> – IAG has subsidiary operations in **Singapore**.



Operations in Australia,  
New Zealand and  
Singapore



**13,585**  
total people  
across IAG

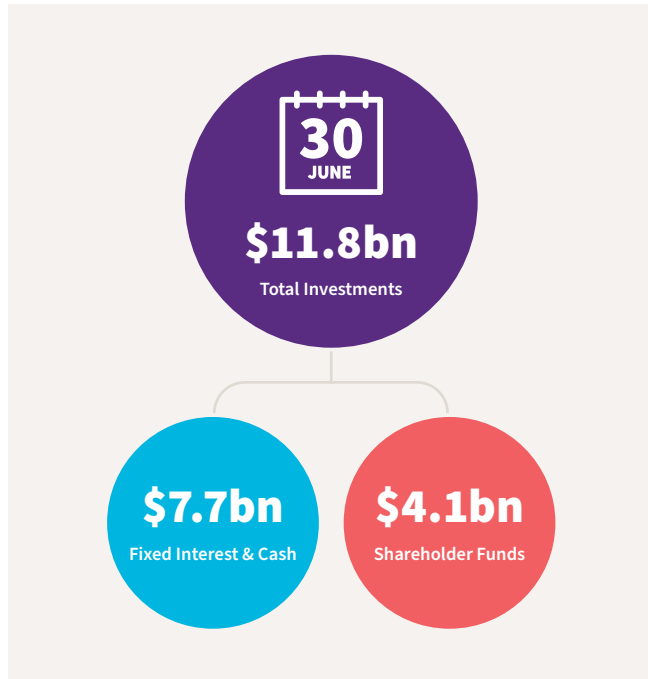


<sup>4</sup> Employee numbers as of 1st July 2022. Note these numbers differ from the reported headcount in the FY22 ESG Data Summary, which excludes casual employees and workforce contractors.

<sup>5</sup> During December 2021, IAG completed the sale of its 80.64% interest in its Vietnam subsidiary, AAA Assurance Corporation, and on July 2022 exited its 49% investment in Malaysian insurance company AmGeneral.

## Our investments

Our Capital Markets team provides investment management and administration services and investment risk and performance services for IAG.



## Our supply chain

Our supply chain is broadly divided into two areas – corporate procurement and insurance claims supply chain.

Our corporate procurement spend is ~\$1.1bn with >1,000 suppliers.

During the Reporting Period, our largest corporate procurement suppliers by spend provided the following goods and services:

- Professional services
- Information and communication technology
- Contingent labour
- Business process outsourcing
- Advertising and media
- Property, & Facility Management services

Our insurance claims supply chain spend, with around 450 contracted suppliers, is in excess of \$2bn annually. These suppliers include motor vehicle repairers, hire car providers, builders, restorers, loss adjusters and appliance suppliers.



# Understanding the risks of Modern Slavery practices in our operations and supply chains

---

We recognise the causes of Modern Slavery are increasingly complex, often with several factors combining to create conditions that constitute Modern Slavery. We understand that worker vulnerability – including exposure to poverty and inequality, discrimination, and corruption – is often the primary contributor to Modern Slavery. Our operations, our supplier locations, and the types of products or services we are procuring are some of the key factors we consider when mapping our exposure to Modern Slavery risks.

## Risks within our operations

Acknowledging potential heightened risk in recruitment practices, particularly through external agencies, our recruitment partners are subject to the same procurement processes and Modern Slavery risk assessment as other suppliers and vendors (as described in *Risks within our supply chains*).

We recognise that our newly acquired **subsidiaries** can potentially be subject to Modern Slavery risks. Following a period of integration for recent mergers or acquisitions, our **wholly owned and controlled** subsidiaries are considered part of the IAG Group for governance purposes, and we work with them to align to the same commitments, risk management framework, policies, and procedures (see *Actions taken to address our Modern Slavery risks*).

## Risks within our investment landscape

Risks associated with Modern Slavery have the potential to arise through our investment activities, our use of external fund managers and associated suppliers. Our commitment to monitor for Modern Slavery risks in our investments is outlined in IAG's [Responsible Investment Policy](#).

## Risks within our supply chains

To understand the inherent Modern Slavery risk profile of our supply chains, contextual factors were incorporated into our Group-wide supplier risk management process during FY22 (see *Actions taken to address our Modern Slavery risks*). These risk factors include:

- **High-risk geographies or jurisdictions**
- **High-risk product and service categories and sub-categories**

IAG also aims to consider **worker vulnerability** in our risk identification and mitigation process e.g. workers involved in providing services or products to IAG, who are in precarious situations and/or experiencing financial hardship (e.g. temporary migrant, base-skill, minimum wage, casual, apprentice workers).

Based on the application of these contextual factors, a number of Modern Slavery risk hotspots have been identified (heightened risk areas).



- Potential risk hotspots (heightened risk areas) in our **corporate supply chain** that could give rise to modern slavery risks:
  - IT (Hardware, Software, Project Delivery, Cloud Services).
  - Marketing & Communication (Direct Mail Houses, Promotional Items, Sponsorship & Events, Mail & Courier Services, Print).
  - Property, Facilities Management & Office Solutions (Facility Management services, Construction, Office Supplies, Catering, Office Moves, Security).
  - Travel & Fleet (Accommodation, Vehicle Fleet, Ground Transportation).
  - Contingent Labour, Business Process Outsourcing (BPO) Services.
- Our **claims supply chain** often includes sub-contracting for service delivery and the following potential risk hotspots (heightened risk areas) have been identified:
  - Smash repair and towing services.
  - Property repair services.
  - Motor and property-related products associated with the above services (e.g. paint, timber, plaster board, nails, fasteners, lubricants, oils, batteries, glass, tyres, windscreens).

**We recognise that Modern Slavery risks are constantly evolving and we strive to keep up to date and deepen our understanding through media monitoring and engagement with industry associations and peers. Notable supply chain impacts in the reporting period include sanctions resulting from the invasion of Ukraine by Russia and new pandemic-related shutdowns in China. We aim to integrate these evolving considerations into our approach to assessing Modern Slavery risks.**





# Actions taken to assess and manage our Modern Slavery risks

IAG includes Modern Slavery and human rights considerations in our key frameworks and policies, including the Group Risk Management Strategy (RMS) and the Group Risk Appetite Statement.

## Our risk management framework

At IAG, managing our risks enables us to realise our purpose ‘to make your world a safer place’ and deliver on our strategy ‘to create a stronger, more resilient IAG’. We use an enterprise-wide approach to risk management and our Risk Management Framework (RMF) comprises all the frameworks, policies, standards, systems, processes, and structures IAG uses to manage risk.

We articulate the levels, boundaries, and nature of risks we are willing to accept, actively manage, or avoid in pursuit of IAG’s strategic objectives. Our Group Risk Appetite Statement includes consideration of Modern Slavery risks as follows: “IAG has no appetite for Modern Slavery in any of its forms in our operations and supply chains. Should a breach be identified within IAG’s business operations, IAG will use its influence, insofar as possible, to remediate the situation to the benefit of the victim(s).”

| Our commitment   | Our management systems and controls  | Our grievance mechanisms and plans for remediation  |
|--|--|---|
| <ul style="list-style-type: none"> <li>• Policies</li> <li>• Frameworks and standards</li> <li>• Accountabilities</li> <li>• Stakeholder engagement</li> <li>• Industry participation</li> </ul> | <ul style="list-style-type: none"> <li>• Risk assessment</li> <li>• Capability building</li> <li>• Process consistency</li> <li>• Supplier engagement</li> <li>• Monitoring &amp; reporting</li> </ul> | <ul style="list-style-type: none"> <li>• Grievance mechanisms</li> <li>• Remediation</li> </ul> |

## Our Modern Slavery Program

For the past three years, we have adopted the approach outlined in the United Nations Guiding Principles on Business and Human Rights (**UNGPs**) to identify, assess, and manage our Modern Slavery risks.

Our Modern Slavery Program (**Program**) is centred on 3 pillars: (1) Commitment, (2) Management Systems and Controls, and (3) Grievance and Remediation. This approach identifies risks that may be caused by, contributed to, and directly linked to our activities, and enables a holistic consideration of Modern Slavery risks.

IAG has, in previous periods, identified, and remedied, key Group commitments and policy-level gaps to include modern slavery risk, these include:

- Our [Code of Ethics and Conduct](#) specifically references Modern Slavery and human rights;
- Our [Social and Environmental Framework](#) includes IAG’s commitments to community engagement and impact,

human rights, supporting its people and addressing climate change and environmental impacts;

- Our **Group Procurement Policy** references our [Supplier Code of Conduct](#); and
- Our [Responsible Investment Policy](#) sets expectations in relation to Modern Slavery, human rights and labour controversies which are relevant when making and managing investments.

Last Reporting Period we commenced work to embed Modern Slavery commitments within IAG’s management systems and processes by extending communication of our Supplier Code of Conduct to our supplier base with whom we have direct contracts; supplementing the Mergers and Acquisitions (M&A) Procedure to include human rights issues as part of our due diligence activities; and working with our Group Operational Risk team to implement Modern Slavery risk assessment ratings into IAG’s integrated risk management system (myrQ).

# Actions taken to address our Modern Slavery risks

---

**As a general insurer that operates in Australia, New Zealand, and Singapore, we are exposed to environmental, social and governance (ESG) risks, including Modern Slavery. During the Reporting Period we took a range of actions to improve our management of these risks.**

ESG risks are identified and managed as part of IAG's risk management framework as overseen by the Board. Through risk profiling and ongoing trend analysis, information on these risks is collected and reported to our Group Leadership Team (GLT) and Board and used to update our strategy at appropriate intervals. Risk management is the responsibility of all employees. To support this, IAG has adopted a Three Lines of Defence model that allows risk management to be embedded in business processes, decision making and the way we work. All risk activities are designed in this context.

During the Reporting Period we have focused our Modern Slavery efforts on management systems and controls, especially regarding risk assessment, capability building, process consistency, and monitoring. We have also focused on collaboration efforts with industry peers to discuss common areas of challenge and on development of potential collaborative solutions.

## Addressing risks in our internal operations

Within our operations we identified that recruitment practices are an area of risk. Addressing this risk requires raising awareness within our internal policies and procedures such as our Code of Ethics and Conduct, recruitment policy & guidelines, and our mergers and acquisitions processes.

## Compliance to our Code of Ethics and Conduct

Our [Code of Ethics and Conduct](#) is fundamental as it makes clear the behaviour that we expect from everyone at IAG.

It applies to all our people in every part of our business, including our Board. Our Code of Ethics and Conduct specifically includes our commitment to *preventing and ending all forms of modern slavery, child labour and human trafficking and to never tolerate any abuse of human rights including modern slavery, child labour or human trafficking anywhere in our operations or supply chain*. Our Code of Ethics and Conduct online training module provides specific examples to illustrate how our people can uphold our commitments.

## Working with contingent labour

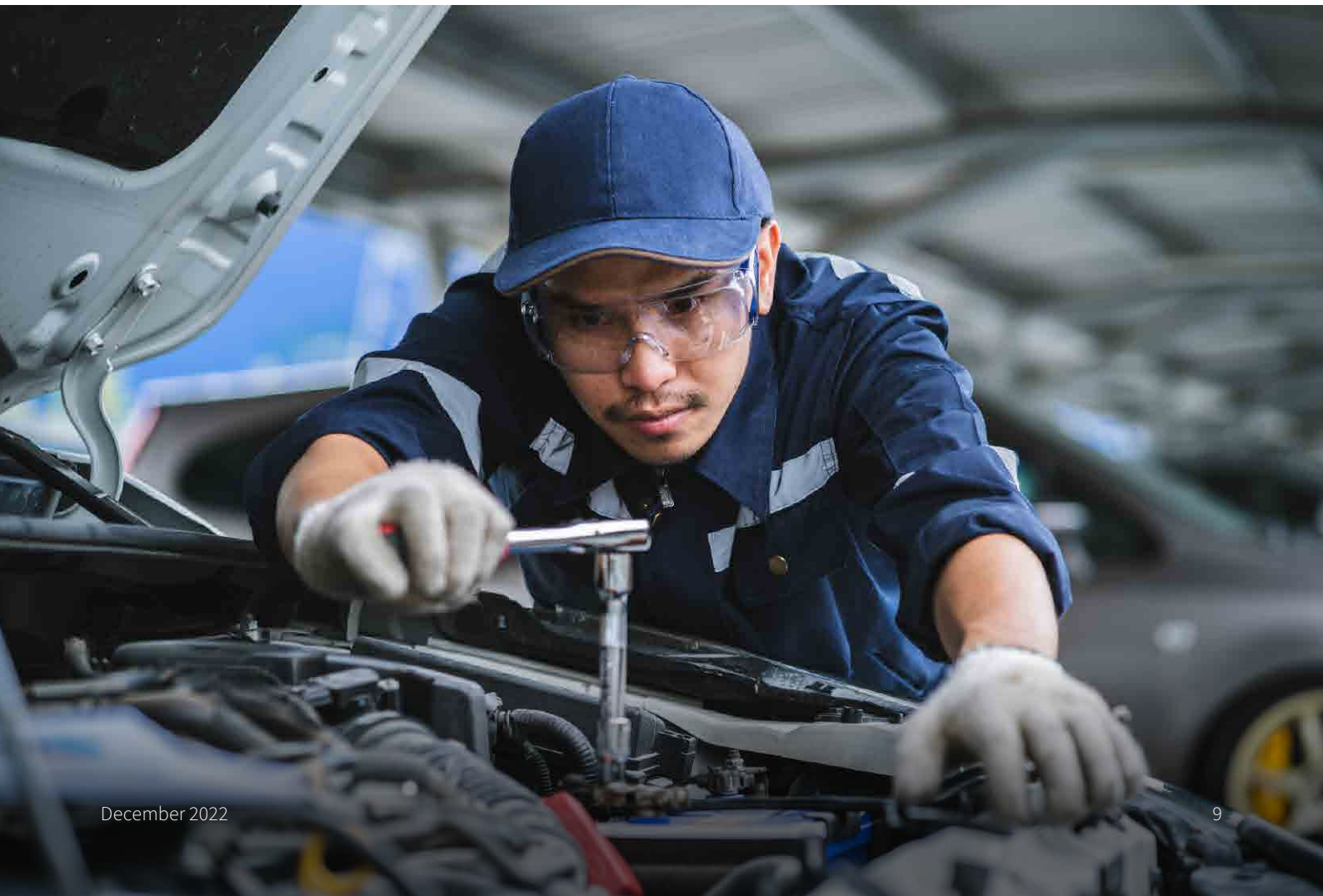
Our use of contingent labour is overseen by our Talent Acquisition teams and they will be subject to the same controls and level of scrutiny as any other suppliers through their contracts.

- Our aim is to ask all our contracted suppliers to acknowledge and agree to ESG expectations set out in our Supplier Code of Conduct.
- Based on the application of a Modern Slavery risk rating, we ask corporate suppliers (incl. providers of Contingent Labour and Business Process Outsourcing (BPO) Services) to complete a Modern Slavery questionnaire (see *Addressing risks in our supply chains*).
- We ask that particular non-workforce contractors undergo similar checks as our own employees, such as references, criminal history, and probity checks, before commencing work for IAG which helps us to understand any areas of potential vulnerability.
- Our Standard Contracts and Purchase Order Terms and Conditions include robust Modern Slavery clauses.

## Subsidiaries alignment to IAG policies and procedures

We recognise that our **subsidiaries** also need to be aware of and actively manage the risk of modern slavery practices. For new mergers and acquisitions, we have a process in place that includes considering human rights as part of our non-financial risk assessments. Once the Mergers and Acquisitions Transaction team has obtained final approval, we move to the integration planning stage, which involves developing a plan and establishing an integration committee. This committee oversees the acquired entity's strategic alignment and integration of IAG's policies and procedures, including those with specific Modern Slavery considerations.

Over FY21 and the current Reporting Period, Group Risk conducted a compliance review exercise on all subsidiaries to assess their level of alignment to IAG policies and procedures. The compliance review identified areas of focus and opportunities for IAG to consider on aspects of the subsidiaries processes and procedures including for modern slavery.



## Addressing risks in our supply chains

During the Reporting Period, we have made progress in embedding processes and tools that enable us to monitor the risk of Modern Slavery in our corporate and claims supply chains, assess areas of high risk, and put plans in place to mitigate those risks. We have also developed a draft Sustainable Procurement Strategy to enable improved focus on key ESG areas for our corporate supply chains to take into consideration, including Modern Slavery risks.

## Responsible Sourcing and Sustainable Procurement strategy

In FY22 the Safer Communities and the Procurement teams worked together to develop a refreshed Sustainable Procurement strategy, operating model, and priority areas. New priority areas identified were:

- IAG's **Reconciliation Action Plan** – *We are positively contributing to Aboriginal and Torres Strait Islander businesses through increased participation throughout our corporate supply chain.*
- IAG's **Climate & Disaster Resilience Action Plan** – *We are playing our part in driving towards Net Zero by 2050 through targeted emissions reduction actions in our corporate supply chain.*
- IAG's **Modern Slavery Program** – *We are actively looking to identify, manage, and mitigate risks of Modern Slavery in any of its forms in our operations, corporate and claims supply chains.*

During the Reporting Period, our corporate teams started working on implementation road maps, and will continue this work throughout FY23.

## Activating our integrated risk management system (myrQ), vendor risk management (VRM) module

In November 2021 IAG activated its VRM module as part of a Group-wide supplier risk management system transition. The new module now provides data relating to Modern Slavery within our supply chain including:

- **Supplier Modern Slavery risk rating** – an automatically assigned Modern Slavery risk rating (based on supplier location and sub-category of service / product).
- **A systematic communication of the IAG Supplier Code of Conduct (SCOC)** – IAG SCOC contains minimum requirements and ESG expectations of its contracted suppliers, including regarding Modern Slavery.
- **Modern Slavery Supplier Questionnaires** – sent to suppliers depending on the initial risk rating assigned. It is required to be completed and approved in the system against model answers.

We aim to provide all our active contracted suppliers with a copy of the IAG Supplier Code of Conduct, which forms part of our supplier onboarding process.

### Focus – Supplier Code of Conduct exemptions

At IAG, we strive to demonstrate the highest standards of business ethics and we are committed to managing our supplier relationships in an ethical, transparent, and responsible manner. For every expectation we have of our suppliers, the IAG Supplier Code of Conduct (SCoC) reinforces IAG's commitments.

To strengthen our approach to managing Modern Slavery risks in our supply chain we are continually looking for opportunities to engage constructively with our contracted suppliers.

Whilst the vast majority of suppliers align to the IAG Supplier Code of Conduct, some provided their own ESG commitments rather than aligning to our documentation.

For these instances we have developed a SCoC exemption process through which we review like for like policy or code-level documentation to ensure our ESG expectations are also reflected within our suppliers' commitments.

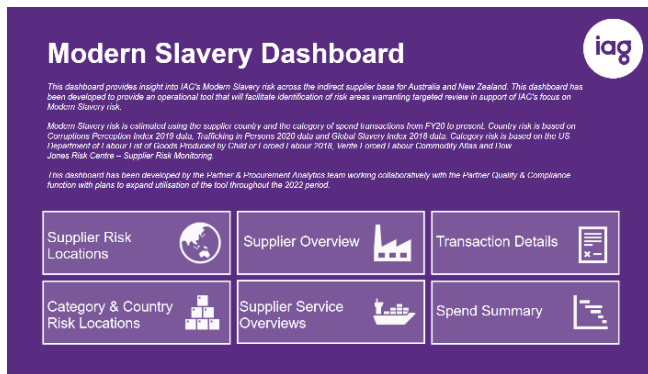
Based on this process, so far, we have granted two exemptions and used non-alignment results to inform our tendering decision and whether we would maintain a business relationship with a supplier.

**IAG reviews this Code regularly to ensure it continues to reflect stakeholder expectations and legislative requirements.**

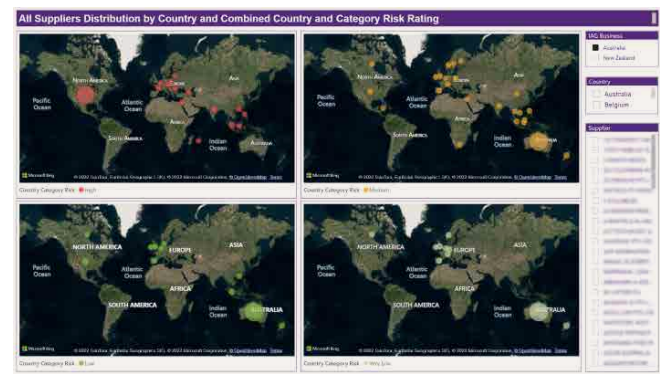
## Our supply chain risk mapping tools

IAG in FY22 developed a data & analytics-based Modern Slavery Dashboard (the **Dashboard**). This dashboard provides insight into IAG's Modern Slavery risk across its corporate supplier base for Australia and New Zealand. Modern Slavery risk is based in internationally recognised references and risk indexes for supplier location and the sub-category of spend transactions.<sup>6</sup>

This dashboard has been developed to provide an operational tool that facilitates identification of risk areas warranting targeted review in support of IAG's focus on Modern Slavery risk (see Assessing the effectiveness of our actions).



We continued utilising Third Party Risk Management tools for identification, assessment, management, and monitoring of risks associated with IAG's suppliers. These tools include modules to actively monitor adverse media for a broad range of supply chain risks such as fraud, corruption, and human rights violations, providing real time alerts on our procurement suppliers.



## Taking action to support our BPO suppliers during COVID-19 disruptions

Our Business Process Outsourcing (BPO) providers are in Australia, Philippines, South Africa, and India. These locations and operations continued to be heavily impacted by COVID-19. The programs and initiatives that we had developed in 2021 and 2022 in consultation with the Australian Prudential Regulation Authority, which allows our BPO employees to work from home, have been extended where possible in this Reporting Period. We also looked for opportunities to learn from our BPO partners' current practices with regards to Modern Slavery, as our key providers report under the UK Modern Slavery legislation and we monitored their compliance through our ongoing partner risk management activities.

## IAG Anti-slavery Training

In the previous Reporting Period we developed an Anti-slavery Training module. This online module is part of IAG's multi-year Modern Slavery Program and constitutes a key control against Modern Slavery risks. The training module is available on our intranet learning library and is available to all employees across Australia and New Zealand. During the Reporting Period, in September and in May 2022 we delivered the content of this training in four facilitated sessions for targeted audiences across the Procurement function via our Master Class format.

<sup>6</sup> Country risk is based the Global Slavery Index 2018. Category risk is based on a mix of references, including the US Department of Labour List of Goods Produced by Child or Forced Labour 2018, Verite Forced Labour Commodity Atlas and Dow Jones Risk Centre – Supplier Risk Monitoring.



# Assessing the effectiveness of our actions

---

**We understand that an entity cannot improve its response to Modern Slavery if it does not assess the effectiveness of its actions. We are committed to continuous improvement.**

## **IAG Governance structure**

The Board of IAG has responsibility for monitoring all key risk and compliance matters by ensuring the implementation of an adequate and effective risk management and internal controls framework.

Roles and responsibilities of the Board and its standing committees – the Risk Committee, the Audit Committee, the People and Remuneration Committee and the Nomination Committee – are set out in the Corporate Governance section of the IAG website.

## **Steering and management of our Modern Slavery Program**

In addition to IAG's overarching Governance structure, the following measures are in place to specifically review and assess the progress of our Modern Slavery Program:

- IAG's Chief Operating Officer is responsible for the delivery of the Modern Slavery Program of work.
- Our Procurement function is responsible for the execution of the Program and has dedicated resources to manage it.
- Our Modern Slavery specialist engages with various functions across IAG Australia and New Zealand including Corporate Affairs, People and Culture Operations, Safer Communities, Procurement, Claims Supply Chain, Legal, and Operational Risk and coordinates our activities and Statement development.

## **Monitoring the effectiveness of our controls through internal deep dive**

In the reporting period, IAG worked on the implementation of Modern Slavery controls within its supplier risk assessment process. These latest improvements enabled a move to a systemic and evidence-based deep dive process to test the effectiveness of Modern Slavery controls.

Action within the reporting period included the development of the IAG Modern Slavery Dashboard (Dashboard) and the roll out of IAG's Third Party Risk Management system and specifically its vendor risk management (VRM) module:

- The Dashboard provided us with quarterly insights into IAG's Modern Slavery risk profile across our corporate supplier base for Australia and New Zealand. This dashboard has been developed to provide an operational tool that facilitates identification of risk areas warranting targeted review in support of IAG's focus on Modern Slavery risk.
- Our VRM module has been progressively embedding anti-Modern Slavery considerations within the Group-wide supplier risk management process. Informed by the result of the Modern Slavery Dashboard, we selected a sample of supplier risk assessments to review.

## Our engagement with suppliers on Modern Slavery

A direct result of embedding Modern Slavery risk ratings and supplier questionnaires into VRM during this Reporting Period has been an increase in supplier response review and approval. This has enabled IAG to have a systematic discussion with our corporate suppliers base on Modern Slavery.

## Our industry collaborations

As with many financial services organisations, many of our suppliers deliver services rather than products. We believe that industry collaboration will bring value not just to our unique supply chain, but also contribute to other businesses in the broader sector. We have during the Reporting Period set up a peer community of practice for Modern Slavery specialists and practitioners and became an active member of the Insurance Council of Australia (ICA) Modern Slavery Working Group established in the Reporting Period. These discussions have enabled us to keep in touch with Modern Slavery and industry trends.

## Reporting and remediation

Our **Group Whistle-blower Policy** and framework is underpinned by an independent whistle-blower line (ActionLine), which is managed by a third-party provider. This service allows our employees and suppliers to report alleged misconduct in a confidential manner and helps facilitate the protection of the identity of the whistle-blowers where they wish to remain anonymous. In 2020 we prepared guidance for the ActionLine manager to support them should a Modern Slavery incident is reported.

In addition to our Whistleblower ActionLine our employees can highlight issues through our quarterly culture surveys. The survey results are followed through by management and the Board with a key people metric included within the Group Balanced Scorecard.

We have principles in place for remediation that are people-centred and based on good practice. If Modern Slavery issues are identified, our attention is on performance management of the supplier with a focus on improving practices. While our specific activities in remediation may vary, and are tailored to the situation, our key focus is to ensure that any victims identified are not further harmed.

## Consultation

In the process of preparing this joint Statement, IAG consulted with the Reporting Entities covered by this Statement, communicating our approach and commitments. For Reporting Entities that are holding companies that do not have substantive business operations or assets, we communicated via a Board circular. The two Reporting Entities which are operating companies – Insurance Australia Limited and Insurance Manufacturers of Australia Limited – use IAG's Group Procurement function and have a shared supply chain. This Statement was circulated to the IAG GLT and the Board of IMA for comment and endorsement, prior to being put to the Board of IAG for review and approval. We look forward to collaborating further with our industry, other business sectors, governments, and the community in identifying and responding to Modern Slavery risks.



# Looking forward

---

Our Modern Slavery Program to date has focused on establishing our commitments, improving our understanding of our operations and supply chain risk profile, and on the implementation of controls. Our aim for the next reporting period is to continue to improve those controls while demonstrating progress in our identification and management of potential risks in IAG's supply chain. We will work with our peers and industry associations to broaden the knowledge of Modern Slavery and its impact on operations and supply chains.

At IAG, we are focused on developing enduring, effective partnerships with peer organisations, suppliers, and the communities in which we operate to bring an end to Modern Slavery.

