



# Chubb

## Modern Slavery and Human Trafficking Statement

Chubb Fire & Security Pty Ltd  
ABN 47 000 067 541

## Modern Slavery and Human Trafficking Statement 2023

Chubb Australia Pty Ltd (ABN 13 000 096 122) and  
Chubb Fire & Security Pty Ltd (ABN 47 000 067 541))

### Reporting entities

This Modern Slavery and Human Trafficking Statement is made pursuant to the Modern Slavery Act 2018 (Cth) by Chubb Australia Pty Ltd (ABN 13 000 096 122) and its trading subsidiary, Chubb Fire & Security Pty Ltd (ABN 47 000 067 541) ("Chubb"), in respect of Chubb and its related bodies corporate, to address modern slavery and human trafficking risks in our business and supply chain and relates to the financial year ending 31 December 2022 ("the reporting period").

Chubb provides this Modern Slavery and Human Trafficking Statement to Australian Border Force, each year, for public viewing

### About us

Chubb is a leading provider of fire safety and security solutions and services for customers worldwide. We have been protecting people and assets for over 200 years. Today, our employees in 200+ branches in 17 countries work to make the world safer, protect people and provide peace of mind. Chubb offers high quality service, and innovative, technology-enabled solutions for business and home – from design and installation to service and monitoring, with our fire, security and monitoring services covering more than one million sites around the world.

Chubb is a part of APi Group, a global, market-leading business services provider of safety and specialty services in over 500 locations worldwide. APi Group provides statutorily mandated services to a strong base of long-standing customers across industries, primarily in North America. APi Group's winning leadership culture driven by entrepreneurial business leaders delivers innovative solutions for our customers.

### Reporting entities, structure, operations, and supply chains

Chubb's supply chain is comprised of 30 employees who manage and liaise with more than 2,500 suppliers, 3 distribution centres and 1 major manufacturing plant. The mission of Chubb's Supply Chain Management is to obtain product, equipment and services for its customers while ensuring complete compliance with corporate policies, national and local rules and regulations. The goal is to:

- Procure goods and services for the most competitive price while assuring highest quality and timely availability without risk or harm to Chubb employees, contractors, the community, or the environment.
- Ensure goods and services purchased conform to specified requirements, as detailed throughout the supplier engagement process and that all documentation contains clear information.
- Make all purchases on the basis of fair and equitable competition.
- Conduct the entire process of purchasing in an impeccable and transparent manner without conflict of interest or bias.
- Eliminate any possibility or appearance of improper business relationships.

As a provider of fire and security services in Australia, Chubb considers its risk of direct exposure to modern slavery risks to be low, however it recognizes that it can be indirectly exposed through its supply chain. As a result, Chubb takes a targeted, risk-based approach to the engagement and monitoring of its supply chain to ensure that the risks of modern slavery are regularly assessed and addressed.

We recognize that modern slavery is challenging and complex, and that risk levels associated with modern slavery are intrinsically linked to vulnerable populations, minorities, and socially excluded groups.

As a part of our risk-based approach, we consider information and resources from Transparency International Corruption Perceptions Index, the International Labour Organisation, and the Modern Slavery Registry.

### Ethics and Business Conduct

Chubb is committed to maintaining the highest standards of corporate responsibility, ethics, and business conduct. As stated in our Code of Ethics, all directors, officers, and employees of the Company are

expected to conduct themselves with the highest degree of honesty and ethics when acting on behalf of the Company. Chubb expects full compliance with our Code and all applicable laws and regulations, in all places, all the time.

Chubb is committed to strong corporate governance practices that are designed to maintain the highest standards of ethics and compliance, as reflected in our Code of Ethics. Additionally, our governance structure enables experienced and accomplished directors to provide oversight of our business.

Chubb's suppliers are critical to our success, and for Chubb to provide products and services that exceed our customers' expectations in a responsible manner, our suppliers, as applicable, are also expected and required under contract to meet our expectations for ethics and compliance.

## Potential risks of modern slavery practices in operations and supply chain

As with most large global companies, we cannot exclude the possibility that modern slavery practices may occur within Chubb's Supply Chain. Therefore, it is important that we be able to detect any modern slavery occurrence by fostering collaborative relationships with our external partners to identify and address risks and generate transparency throughout the Supply Chain.

Chubb requires our suppliers not to engage in the use of forced labour, bonded labour, indentured labour, involuntary prison labour, child labour, slavery or trafficking in persons. Chubb's supply agreements require our suppliers to sign their commitment to this requirement. Chubb's Supply Chain personnel periodically complete online training to ensure compliance.

Chubb Supply Chain personnel have risk assessed our supplier base using resources available from [Transparency International Corruption Perceptions Index](#), the [International Labour Organisation](#) and the [Modern Slavery Registry](#).

Chubb's major offshore third-party manufacturer is in a region identified as high risk and as a result, is inspected annually by a qualified third party. The qualified third party thoroughly inspects the site and provides a documented assessment on our manufacturer's social compliance performance against the following performance areas:

- Social management system and cascade effect,
- Workers Involvement and Protection,
- The rights of freedom of association and collective bargaining,
- No discrimination,
- Fair remuneration,
- Decent working hours,
- Occupational health and safety,
- No child labour,
- Special protection for young workers,
- No precarious employment,
- No bonded labour,
- Protection of the environment, and
- Ethical business behaviour.

Over the years the annual reports have identified several risk mitigation opportunities for improvement from the performance areas above and provided relevant remedial actions for our manufacturer to complete and for Chubb to monitor and ensure compliance. The reports track, score and rank their improvement performance.

We have recently increased our requests for social compliance information from key suppliers, such as confirmation that they have policies in place to identify and adequately address issues relating to modern slavery and human trafficking in their supply chains.

## Activities to assess and address modern slavery risks

### Respecting and Protecting Human Rights - Why it Matters

Chubb is committed to good and responsible citizenship and engaging with others to promote better working conditions for all. Our global footprint helps us to make our mark in the fight for safer working

conditions and equal opportunity around the world. Chubb takes robust and thorough measures to protect workers at our own facilities. We also seek partners who share our high ethical standards and our passion for making the world a better place, and we seek promote positive change by encouraging our business partners and communities to similarly respect human rights. Therefore, we honour our values by engaging with those who share our commitment to helping keep workers safe, comfortable, and productive.

### How we make it possible

We select our business partners through a competitive but fair process. This means we:

- Look for partners who meet our standards of safety, integrity, and performance while delivering what they promise, on time and on budget,
- Conduct due diligence to ensure potential key business partners are qualified and reputable before we bring them on-board, and monitor their performance afterward,
- Set up clear, specific performance requirements with measurable results,
- Formalize relationships in writing so transactions are transparent and properly recorded, and business partners are accountable to perform in accordance with our safety, ethics, and compliance requirements,

Our company respects and protects human rights by:

- Ensuring safe and healthy working conditions for our employees, based on whatever is most stringent: Australian laws and regulations, or company policies,
- Never using child labour or forced labour in Chubb's own workforce, including its agents and subcontractors, and always seeking out business partners who share our commitment to fighting human or sex trafficking and supporting human rights,
- Prohibiting discrimination based on any unlawful basis, including race, colour, sex, sexual preference, age, physical or mental disability, marital status, family or carer's responsibilities, pregnancy, religion, national extraction or social origin, and other protected categories as provided by applicable law,
- Delivering compensation and benefits to attract and retain strong talent for our businesses, while complying with all applicable regulations pertaining to wages, hours, safe work environments and and legally mandated benefits,
- Recognizing the principle of freedom of association and the right to collective bargaining as they exist under applicable laws where we operate,
- Promoting responsible sourcing practices, including that suppliers provide safe and healthy work environments for their employees, avoid discrimination, ensure that child labour is not used, and avoid human trafficking.

### Supplier Compliance Programs

Chubb's standard contract terms require suppliers to have management systems, tools, and processes in place that (a) ensure compliance with applicable laws, regulations, and requirements as set out in our Code of Ethics; (b) promote an awareness of and commitment to ethical business practices; (c) facilitate the timely discovery, investigation, disclosure, and implementation of corrective actions for violations; and (d) provide training to employees on compliance requirements.

### What is Chubb doing?

Chubb is committed to ensuring that slavery and human trafficking are not taking place in our businesses or supply chains and, to this end, takes the following actions.

#### 1 Commitment to Good Citizenship

Chubb is committed to good citizenship and believes that engagement with others improves the human condition. For its employees, Chubb ensures safe and healthy work environments, based on the more stringent of Australian laws and regulations, or company policies. Chubb does not use child labour or forced labour. For our communities worldwide, Chubb works to protect the environment, maximize the efficiencies of our products, and reduce wastes, emissions, energy consumption and the use of materials of concern. Chubb obeys the law, does not discriminate in personnel practices, and does not engage in corrupt practices. In addition to its own commitments, Chubb expects direct suppliers to adopt suitable codes of business conduct.

## 2 Supply Chain Expectations

Chubb's suppliers are critical to its success and, in order to provide superior services and products in a responsible manner, Chubb engages suppliers who meet high standards for business practices, environmental responsibility and operational excellence. We insist that our suppliers meet our expectations for ethics and compliance.

Chubb's standard contract terms and conditions of purchase require suppliers to comply with all applicable laws and regulations, including the Modern Slavery Act 2018 (Cth). In addition, Chubb's standard contract terms require suppliers to adopt, and comply with, our Code of Ethics regarding business conduct and ethical conduct. Chubb otherwise seeks to adopt such requirements into contracts it may enter with suppliers, which do not adopt Chubb's standard contract terms.

## 3 Verification of Supply Chain

Chubb engages in verification of product supply chains to evaluate and address the risk of human trafficking and modern slavery. Suppliers are subject to robust selection processes and criteria, including for example, verification against government denied party lists. Periodically Chubb may conduct a site inspection with a supplier. However, Chubb does not in the ordinary course of business conduct site visits or otherwise evaluate suppliers specifically for the purpose of verifying the eradication of slavery and human trafficking in their supply chains.

## 4 Supply Chain Audits

Chubb does not, in the normal course of business, conduct audits (independent, unannounced, or otherwise) of suppliers specifically to evaluate their compliance with company standards for trafficking and slavery in supply chains.

Chubb's suppliers, however, are contractually required to allow Chubb and / or its representatives to assess their compliance upon request, with the expectations set forth in the Code of Ethics in performing work for Chubb. This may include on-site inspection of facilities. Suppliers must also provide additional information and certifications evidencing compliance upon request.

Chubb's major offshore third-party manufacturer is in a region identified as high risk and as a result, is inspected annually by a qualified third party, consistent with the Amfori BSCI Code of Conduct.

## 5 Supplier Certifications

Chubb requires suppliers to submit certifications where required by law.

## 6 Internal Accountability Standards

Chubb maintains internal accountability standards and procedures for employees and contractors failing to meet company standards regarding slavery and trafficking. These include, as described above, Chubb's Code of Ethics. Chubb requires its employees to annually certify that they will honour the Code of Ethics. Compliance with the requirements of the Code of Ethics is expected behaviour for all Chubb employees. Violation of these requirements will result in appropriate disciplinary action. Anyone who observes or suspects a violation of Chubb's Code of Ethics may ask a question or raise concerns in complete confidence.

## 7 Internal Training and Awareness of Modern Slavery and Human Trafficking Risks

Chubb has a comprehensive ethics and compliance training program for all employees. In recognizing and mitigating the risk of human trafficking and slavery in supply chains, Chubb provided human trafficking and modern slavery training to employees and management who have direct responsibility for supply chain management, particularly with respect to mitigation risks within the supply chains of products.

**Child Labour:** Chubb's suppliers must ensure and are contractually required to comply with child labour laws (with the term "child" referring to any person under the minimum legal age for employment where the work is performed). It is a Chubb requirement that suppliers must not use child labour in the performance of their work, whether or not related to Chubb business.

**Human Trafficking:** It is a Chubb requirement that Chubb's suppliers must comply with all laws and regulations prohibiting human trafficking and modern slavery and they must not engage in the use of forced labour, bonded labour, indentured labour, involuntary prison labour, slavery or trafficking in persons.

**Confidential channels for reporting:** To ensure robust reporting of allegations of wrongdoing, Chubb provides safe and confidential channels for employees and third parties (including suppliers) to seek guidance, ask questions, make comments, and report suspected misconduct.

Chubb also expects suppliers to provide their employees and business partners with access to adequate reporting channels to raise legal or ethical issues or concerns, including reports of a violation of the Code of Ethics by a supplier or its business partners, without fear of retaliation.

**Termination for non-compliance:** In the event that a supplier commits any material violation of law relating to basic working conditions and human rights in their performance of work of their subcontracts with Chubb, Chubb has the right to terminate those contracts for default.

**International Trade Compliance:** Chubb's suppliers are subjected to robust selection processes and criteria including verification against government denied and restricted party lists. Suppliers must conduct their business in strict compliance with all applicable laws and regulations governing (a) the export, re-export and retransfer of goods, technical data, software, and services; (b) import of goods; (c) economic sanctions and embargoes; and (d) U.S. anti-boycott requirements.

### **Effectiveness and forward improvement actions**

During 2023, Chubb will continue its actions demonstrating its commitment to ensuring that slavery and human trafficking are not taking place in its businesses or supply chains and will seek to further enhance its due diligence and ongoing monitoring of its suppliers. Chubb is committed to collaborating with its suppliers to identify risks of modern slavery and implement effective corrective actions where non-compliance is identified. During 2023, Chubb will further expand its due diligence to explore additional third party manufacturers compliance risk.

### **Enhanced engagement with, and enhanced due diligence of, suppliers**

Chubb has risk rated its supply chain based on geographical location, Corruption Perception Index (CPI) score and other key criteria. Chubb commenced issuing its Modern Slavery Questionnaire to all existing suppliers on a timeframe determined by their risk rating, and to all new suppliers. Modern Slavery Act compliance clauses are being included in supplier contracts.

Chubb has created a tracker which is being managed by key supply chain management and personnel. This tracker is used to:

- track risk ratings of suppliers,
- track completion of Modern Slavery Questionnaires by suppliers,
- track review of Modern Slavery Questionnaires and record compliance / non-compliance,
- by new and existing suppliers, and to track any risks identified or remediation of those risks,
- facilitate actions based on responses provided by suppliers, including if questionnaires are not returned, and if risks of modern slavery practices are identified,
- Further enhance and optimize the current process, and
- Extend the due diligence to include other third party suppliers

### **Remediation**

Where Chubb identifies risk of modern slavery practices in its supply chain from information provided by suppliers or from its own enquiries, trading with the supplier will be suspended until it is satisfied that the supplier has addressed and / or eliminated the risk.

### **Program Review**

Chubb's assessment of the effectiveness of its Modern Slavery and Human Trafficking Program will require ongoing collaboration with its suppliers and key stakeholders, including supply chain, legal and compliance departments.

### **Statement Approval**

This statement was approved by the board of Chubb Australia Pty Ltd, as the parent entity, including on behalf of its wholly owned subsidiary, Chubb Fire & Security Pty Ltd, on 4 May 2023.

Signed  


David Marven,  
Managing Director  
4 May 2023