

CLAIMCENTRAL  
GROUP

# 2023 Modern Slavery Statement

Claim Central Consolidated Pty Ltd  
ACN 602 460 953

December 2023



# Approval Of Modern Slavery Statement

This Modern Slavery Statement (**Statement**) is prepared in accordance with the requirements of section 14 of the *Modern Slavery Act 2018* (Cth).

This Statement is made on behalf of the Reporting Entities (as set out on page 4) for the financial year ended 30 June 2023 (**Reporting Period**).

This Statement was approved by the board of directors of Claim Central Consolidated Pty Ltd, being the principal governing body of the Claim Central Group, on 1 March 2024.

This Statement is signed by an authorised representative of the Claim Central Consolidated Pty Ltd:



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Brian Siemsen

Group Chief Executive Officer and director of Claim Central Consolidated Pty Ltd

March 2024

# Introduction

Modern Slavery describes situations where offenders use coercion, threats or deception to exploit victims and undermine their victims' freedom. It encompasses human trafficking, deceptive recruitment, forced labour, debt bondage, forced marriage, slavery, servitude, child labour, and other kinds of exploitation that violate a person's human rights and dignity.

The Claim Central Group is proud of the steps it has taken to date to reduce the risk of modern slavery in its operations and supply chain and remains committed to improving practices as its journey to maturity continues.

As part of the Claim Central Group's commitment to continuous improvement, in the Reporting Period there has been a focus on implementing new training for all relevant employees and a new Modern Slavery Policy, as well as implementing a new Supplier Code of Conduct.

In 2024, to further enhance the organisation's commitment, the Claim Central Group will be:

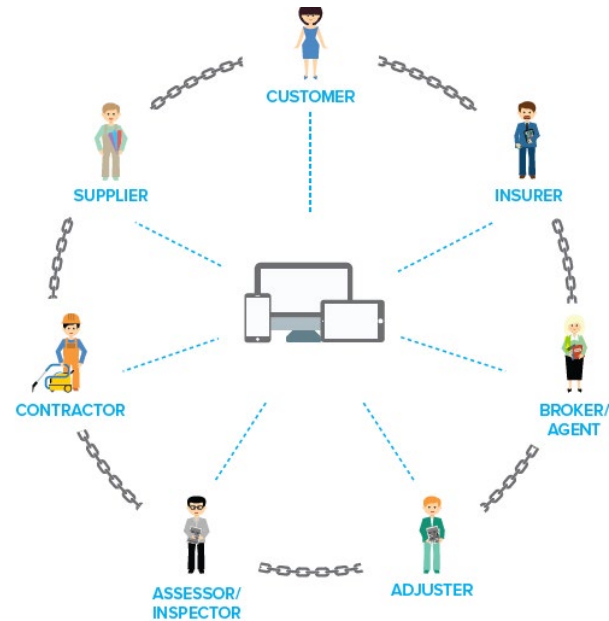
- ✓ Refining appropriate KPIs for measuring the effectiveness of the Claim Central Group's approach to modern slavery.
- ✓ Improving supply chain partner onboarding, including conducting more awareness around the Claim Central Group's Supplier Code of Conduct.
- ✓ Gathering enhanced information from supply chain partners around their own modern slavery compliance practices.
- ✓ Implementing a new annual reporting regime for operations and supply chain partners.

# Reporting entities

- The reporting entities preparing this statement are:
  - Claim Central Pty Ltd (ACN 102 685 343) (**CCAU**); and
  - Claim Central Consolidated Pty Ltd (ACN 602 460 953) (**CCC**), and its wholly owned subsidiaries other than CCAU (**CC Group**).
- CCAU is a wholly owned subsidiary of CCC. The CC Group has a modern slavery framework to drive the identification and risk assessment of supply chain and operations across the global CC Group, which includes CCAU. Accordingly, references in this Statement to the CC Group incorporate CCAU.
- The CC Group has a global annual consolidated revenue of at least \$100 million for the Reporting Period.
- In preparing this Statement, due to the CC Group structure and centralised functions, consultation with all entities in the CC Group has taken to have occurred.

# Corporate group structure and operations

The CC Group is a global provider of insurance technology, providing software as a solution (SaaS) services called Wilbur and Livegenic, predominantly to the insurance industry. These SaaS products help connect all stakeholders in the insurance claim process to make insurance claim processes more efficient and effective.



The CC Group also provides insurance related building repair and make safe services, undertakes motor vehicle repair assessments, and provides loss adjusting/ assessment services, as part of the insurance claim lifecycle through its Claim Central Property, Helio Restoration and Hello Claims businesses.

Headquartered in Sydney, Australia, the CC Group operates in Australia, New Zealand and the United States, but services clients in other regions. The CC Group currently has over 210 employees globally, with the majority based in Sydney.

The corporate group structure of the CC Group is set out in Appendix A to this Statement, and a high-level organisation chart is set out in Appendix B.

More information on the CC Group can be found on its website: [Claim Central Group website](#).

## Modern Slavery risk

The CC Group's approach to identifying and assessing risks of modern slavery in its business operations and supply chains takes into consideration the nature of the corporate operations and core business activities, including the provision of insurance technology (**Technology**) and insurance claims services (repair and assessing) (**Claims Services**), with reference to the geographies in which the CC Group operates.

### Claims Services risk assessment

Following assessment, it is not anticipated that the Claims Services operations or supply chain in Australia and New Zealand (where these services are provided) are susceptible to risks of modern slavery. This assessment is formed on the basis of the following considerations:

- The insurance claims industry is traditionally has a low risk for modern slavery, as does both Australia and New Zealand.
- The regulated nature of the insurance industry overall.
- The need for many participants in the Claims Services supply chain to be licensed or registered by State or Territorial regulators e.g. NSW Fair Trading.
- Working relationships with suppliers.

Products and services provided to the CC Group for its Claims Service operations and supply chain include loss adjustors, investigators, building and restorative services, retail product suppliers, mechanics, surveyors, smash repairers, vehicle hire and transport services, accommodation and other claims service providers.

In forming its assessment of risk, the GG Group is cognisant that while low risk, Claims Services does carry a higher risk compared to other areas of its business and operations, and this risk can increase when the building/ trade industry overall is under pressure from a shortage of workers. This industry pressure can increase the demand for low skilled workers or result in subcontracting and outsourcing arrangements.

The types of exploitative labour practices and breaches of human rights that can give rise to situations where modern slavery risks increase include forced or unpaid work, unsafe conditions, bonded labour, inadequate accommodation, passport confiscation, and human trafficking. The CC Group ensures that its suppliers understand, through their contractual terms and the CC Group Supplier Code of Conduct that there is a zero tolerance for any practices of this nature.

# Modern Slavery risk (cont'd)

## Technology services risk assessment

Following assessment, the CC Group also do not anticipate that its Technology operations or supply chain in any geography are susceptible to risks of modern slavery as the Technology is proprietary technology which is developed, maintained and supported internally within CC Group.

## Corporate supply chain risk assessment

In the reporting period covered by this Statement, the CC Group has not had any material changes within its supply chain, and consider that its existing due diligence remains current, accurate and sound. This due diligence included:

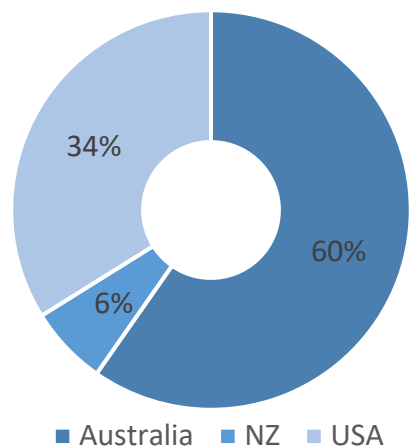
- Reference to resources such as the 2018 Global Slavery Index, the US Department of Labour List of Goods Produced by Child or Forced Labour and Business, and the Human Rights Resource Centre.
- Desktop assessments, to identify modern slavery indicators, and enhanced due diligence for any identified higher risk suppliers.

Products and services provided by suppliers to the CC Group include supply of facilities services (cleaning, security, maintenance suppliers), professional consultancy and advisory services, IT providers (software, IT hardware and consultancy), recruitment services, accommodation and transport services, as well as insurance.

# The CC Group supply chain

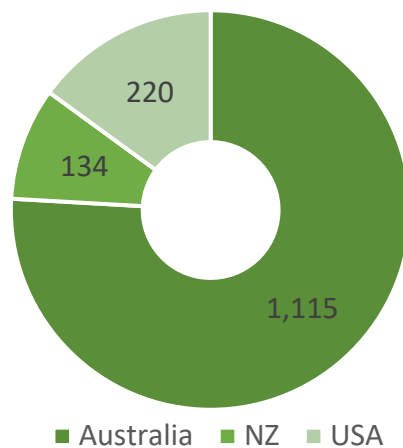
The CC Group supply chain is made up of approximately 1,500 suppliers (an increase from the last reporting period), with an annual supply chain spend of approximately \$128m (decrease from the last reporting period) with its directly engaged suppliers.

### Spend by region



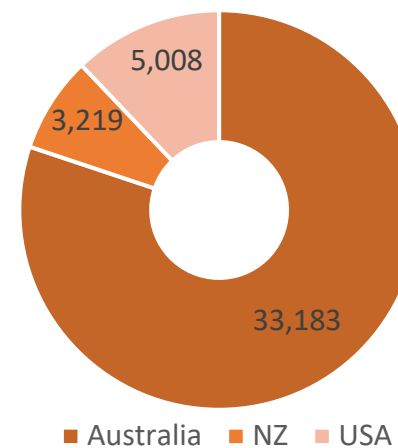
Note: USA spend for 2023 was driven by specific weather events/client services, which the CC Group does not anticipate will continue in the next 12 months.

### Suppliers by region



Likewise, the CC Group anticipates its supplier numbers in USA will move in line with the regional spend in the next 12 months. For goods and services acquired by CC Group, it is recognised that the country of procurement may not always represent the country of origin

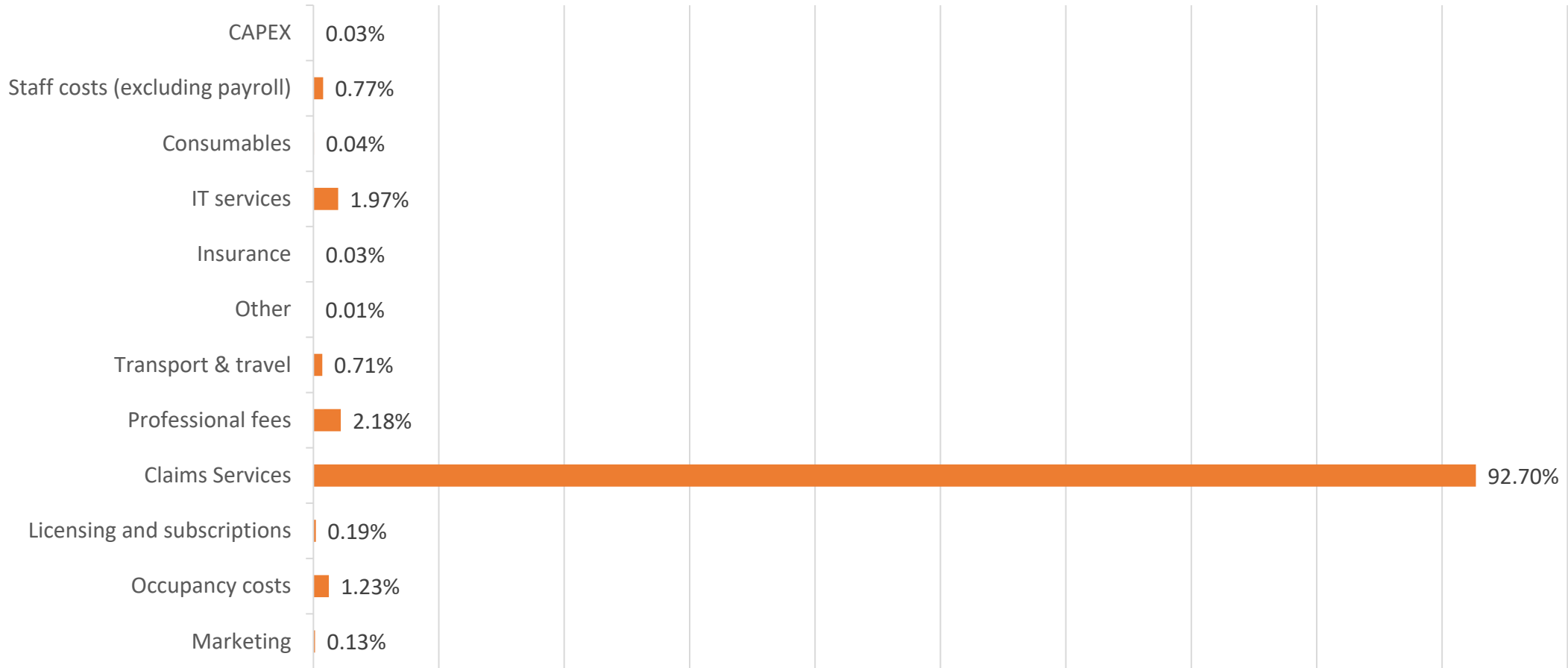
### Invoices by region





# The CC Group supply chain (cont'd)

## Spend type (all regions)



## **Modern Slavery action**

The CC Group is committed to ensuring it is not supplied by anyone who engages in modern slavery. To this end, it has in place systems to:

- Identify and assess risk areas in its business operations and supply chains.
- Mitigate the risk of modern slavery occurring in its business operations and supply chains.
- Monitor risk areas in its business operations and supply chains.
- Remediate harm caused.
- Protect those reporting through grievance mechanisms.

Further detail regarding the actions the CC Group has taken to combat modern slavery are set out below.

### **Modern slavery governance**

The CC Group's approach to modern slavery is facilitated by a top-down approach. The board of CCC is responsible for the overall direction of the CC Group's strategy to address modern slavery and the oversight and approval of this Statement.

The Group Chief Executive Officer has overarching responsibility for the CC Group's Modern Slavery Policy, and the implementation and management of the Modern Slavery Policy is managed by the Group General Counsel & Company Secretary, who is also the Head of Risk and Compliance for the CC Group.

Other senior stakeholders have responsibility for the day-to-day management of suppliers, particularly in Claims Services.

The CC Group assesses risk related to modern slavery associated with its supply chain. The ongoing assessments to be performed will be based on geography, the product or services being purchased, supplier quality performance and the nature of the business transaction.

# Modern Slavery action (cont'd)

## Policies on slavery

- The CC Group has a zero tolerance of all forms of modern slavery.
- The CC Group's Modern Slavery Policy reflects its commitment to acting ethically and with integrity in all its business relationships, and to implementing and enforcing effective systems and controls to ensure modern slavery is not taking place anywhere in its supply chains or in any part of its business.
- The Modern Slavery Policy addresses the risks of modern slavery in the CC Group's businesses and can be read in full here: [Modern Slavery Policy](#).
- The CC Group also has related policies (**Related Policies**), including:
  - ✓ A [Supplier Code of Conduct](#), which addresses Modern Slavery by making expectations of suppliers around modern slavery, working conditions, safety, employment practices etc very explicit.
  - ✓ A Whistleblowing Policy, under which protected disclosures (without fear of retaliation) can be made if there are concerns about any wrongdoings or breaches of the law (as well as an internal business conduct line).
- The Modern Slavery Policy and Related Policies are integrated into the CC Group's business operations and contractual practices by forming part of the contractual obligations for suppliers and featuring in onboarding. They also form part of the terms of employment for employees.
- The Modern Slavery Policy and Related Policies are communicated to employees, contractors and supply chains by being publicly available on company websites, referenced in supplier handbooks and incorporated into contractual obligations. For employees, they're also communicated through targeted messaging and training, including as part of new starter onboarding.
- In addition, and as part of good governance, the CC Group has a number of other governance related policies in place around matters such as anti-bribery and corruption, (employee) code of conduct, workplace health and safety and grievance resolution.

## **Modern Slavery action (cont'd)**

### **Due diligence processes**

As part of the CC Group's initiatives to identify modern slavery and mitigate associated risks in its business and supply chain, suppliers are required to comply with the CC Group's due diligence process, including providing information on policies and procedures on sourcing of goods and services, as well as employment practices and other relevant operational matters.

The CC Group determines the level of due diligence requirement based on a risk assessment of the supplier, origin of goods or services and likelihood of modern slavery occurring in the context of the goods and services.

This approach is supported by the requirement for all suppliers to perform their obligations to the CC Group in accordance with relevant laws, CC Group policies, as well as detailed contractual provisions designed to monitor modern slavery risks of suppliers and their supply chains and require adherence to modern slavery laws as well as training on modern slavery.

In 2024, the CC Group will be migrating many of its suppliers on to a new platform which will enhance the CC Group's ability to collect and assess information provided as part of the due diligence process, and audit suppliers for compliance, as well as obtain annual statements of compliance.

### **Training**

To ensure a high level of understanding of the risks of modern slavery in the CC Group's business and supply chains, training is provided to all relevant employees and contractors. New externally developed training on the CC Group's Code of Conduct and modern slavery (delivered via the Safetrac training platform) was implemented in the Reporting Period.

The CC Group also requires its supply chains to provide appropriate training to their staff, suppliers and other providers, taking into consideration the nature and size of their operations.

As part of the CC Group's 2024 focus, it will be seeking more information from its supply chains on the nature, frequency and type of training they are providing.

## Modern Slavery action (cont'd)

### Remediation

The CC Group recognises that there is no one-size-fits-all approach to modern slavery remediation.

Should modern slavery occur in business operations or supply chains, then to ensure the harm caused is reversed or reduced to the extent possible, the CC Group would enact a remediation program consistent with the principles set out in the 2022 ['Remediating Modern Slavery in Property and Construction'](#) Guide, published by KPMG and the Property Council of Australia.

Given the nature of the CC Group's business, it is anticipated that any remediation plan would be strongly focused on satisfaction and using commercial leverage (including exiting contracts) as solutions.

## Effectiveness in combating Modern Slavery

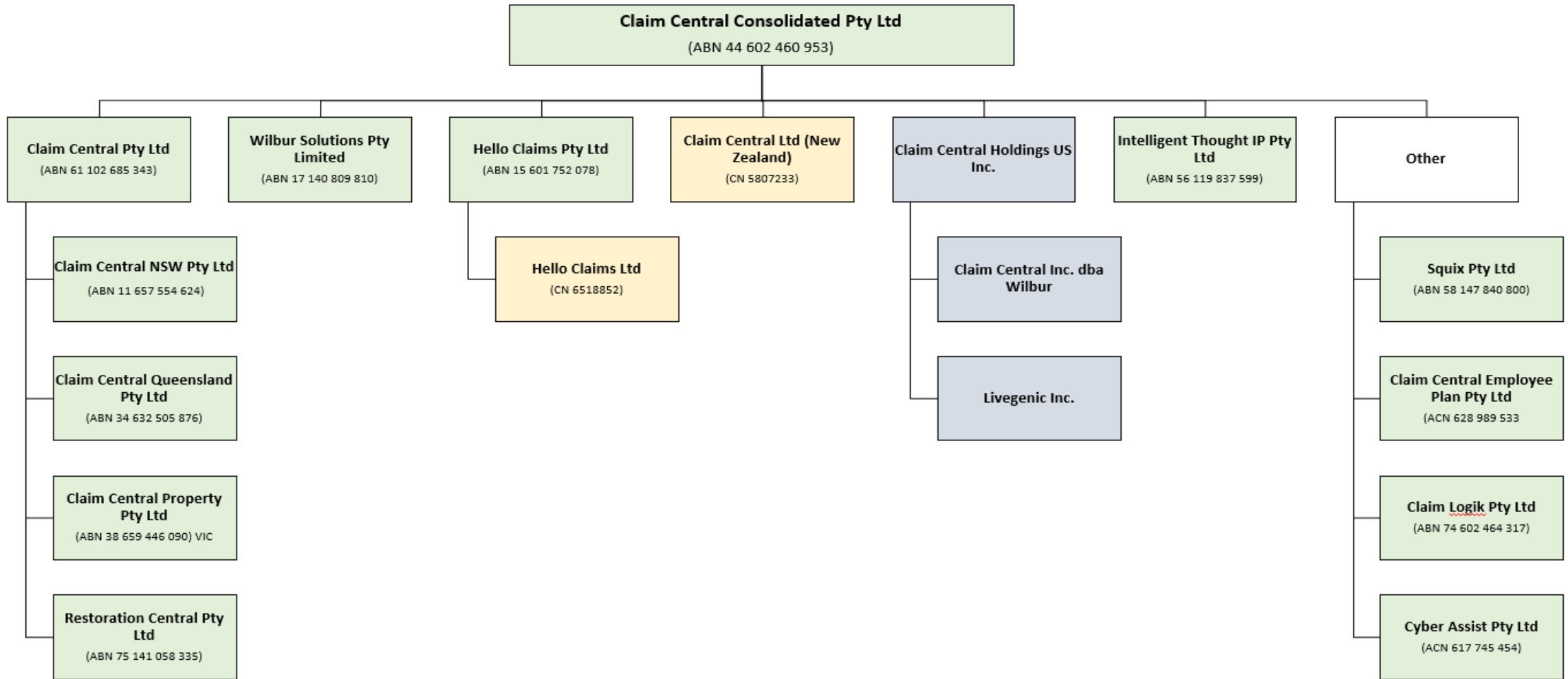
- For the Reporting Period, the CC Group had no incidents of any form of modern slavery in its supply chains or business operations.
- There were also no reported concerns through the CC Group Business Conduct Line, or under its Whistleblowing Service, or via other means of contact.
- The CC Group implemented new training programs (alongside new policies) on Modern Slavery, Work Health & Safety, Code of Conduct and Grievance Resolution, with most employees having completed their assigned training, with the remainder of employees currently completing it in accordance with the required training plan.
- A new Supplier Code of Conduct was published.
- The CC Group is also (at the time of this Statement) collecting acknowledgements from employees to the CC Group Code of Conduct, which includes provisions relating to modern slavery. This is a mandatory requirement of all employees.
- As part of its commitment to continuous improvement, in 2024 the CC Group will mature the way in which it measures how effective it has been to ensure that modern slavery is not taking place in any part of its Claims Services business or supply chain.

## Further steps

Following a review of the effectiveness of the steps the CC Group has taken this year to ensure that there is no modern slavery in its business or supply chains, the CC Group intend to take the following further steps to combat modern slavery in the next 12 months:

- ✓ Review the practices and processes introduced and reported on previously to assess and test their effectiveness, including refining appropriate KPIs for measuring the effectiveness of the CC Group's approach to modern slavery.
- ✓ Build out and embed an improved onboarding and lifecycle processes for suppliers, intended to enhance communications and awareness, as well as the level of information gathered from the CC Group's supply chain partners around their modern slavery practices, training and compliance.
- ✓ Implement a new annual reporting regime for the CC Group's operation and supply chain partners.
- ✓ Continue to manage modern slavery risks by maintaining a pragmatic risk-based due diligence process.

# Appendix A: Corporate Structure



**ENTITY KEY**

- Australia
- New Zealand
- United States



# Appendix B: Organisational Chart

