



Hospitality  
Industry  
Insurance

# HOSPITALITY INDUSTRY INSURANCE MODERN SLAVERY STATEMENT FOR YEAR- END 30 JUNE 2023

we help people get their lives back



This statement is made by Hospitality Industry Insurance Limited ABN 34 124 091 470 006 486 pursuant to *The Modern Slavery Act 2018 (Cth) (Act)*

## INTRODUCTION

The term 'Modern Slavery' is used to describe situations where coercion, threats or deception are used to exploit victims and to undermine or deprive them of their freedom. Types of Modern Slavery include human trafficking, servitude, forced labour, debt bondage, forced marriage and the worst forms of child labour. Hospitality Industry Insurance adopts a responsible and ethical approach to its business and rejects any involvement in, or connection to unethical or illegal behaviour.

We want to ensure that all aspects of our business activity, including our supply chains, are free from any form of Modern Slavery.

Our commitment to managing the risks of Modern Slavery is illustrated by the following framework:



# 1. About Hospitality Industry Insurance

Hospitality Industry Insurance ('**HII**') is a specialised insurer referred to in this statement as HII, us or we. We are a joint venture owned by Employers Mutual Limited (EML) and our industry partners Australian Hotels Association NSW Holdings Pty Ltd and ClubsNSW Insurance Holdings Pty Ltd. We provide workers compensation insurance policies and claims management services for the hospitality industry in NSW.

We are committed to using our established risk management principles and other controls to prevent modern slavery in any of its manifestations across the EML Group. We strive to address modern slavery risks, potentially:

- **CAUSED** by our organisation, where we can act to cease or prevent the risk and eliminate the impact.
- **CONTRIBUTED TO** by our organisation, where we can act to cease or prevent our contribution to the risk and work proactively with supply chain stakeholders to eliminate the impact.
- **DIRECTLY LINKED TO** our organisation, where we can use leverage to influence entities that are causing the risk to take action. If we cannot use leverage with an entity to influence behavioural change and remedy the impact, we will consider terminating our relationship with that entity and seek alternative supply chain partners.

## 2. Our Business and its Structure

Hospitality Industry Insurance Limited is a partner in the EML Group, which is the personal injury management partner of choice for employers and government agencies. For over 110 years, Australians have turned to the EML Group for its claims expertise and personalised support in helping injured workers return to work.

- The EML Group is the provider of claims management for icare worker's insurance in NSW supporting workers and employers in NSW and services a range of government agencies including Police and Emergency Services.
- The EML Group and/or other related bodies corporate provide claims management services in Victoria, South Australia, Queensland, Western Australia and the Australian Capital Territory for self-insured and government clients.
- The EML Group also provides personal injury management services across personal injury, CTP and accident and health lines and in the disability services sector.
- People, building and technology resources are provided to the EML Group through a central management company known as Employers Mutual Management Pty Limited.

### 3. Our Operations and Supply Chain

Entity	Main Operations	Supply Chain
Hospitality Industry Insurance Limited	<ul style="list-style-type: none"> <li>• Underwriting</li> <li>• Claims management</li> </ul>	<ul style="list-style-type: none"> <li>• Companies in the hospitality industry</li> <li>• Investment managers</li> <li>• Regulators</li> <li>• Reinsurers</li> <li>• Professional services companies</li> <li>• Resources, people, technology, rental/leases, general office supplies</li> <li>• Group banking facilities</li> <li>• Claims intermediaries.</li> <li>• Medical services providers</li> </ul>

### 4. Risks of Modern Slavery Practices in our Operations and Supply Chains

Hospitality Industry Insurance Limited is a level 2 insurance group regulated by the Australian Prudential Regulation Authority (APRA) and is required to maintain APRA compliant systems to identify, measure, evaluate, monitor, report, control and mitigate material risks.

Furthermore, when Hospitality Industry Insurance Limited outsources material business activities to external suppliers, APRA requires that these are subject to appropriate due diligence, approval and ongoing monitoring. Hospitality Industry Insurance Limited is diligent in identifying and addressing risks to our operations and supply-chain to fulfil the risk management requirements needed to satisfy its own corporate obligations and APRA regulations.

Whilst we are confident that the risk of us causing, contributing to, or being directly linked to modern slavery risk is low, this area of risk has been incorporated into our risk management process for a number of years. It has been further reviewed during 2023, resulting in the development of a risk-based approach to modern slavery risk, documented in this Statement, including:

- Supplier due diligence.
- Supplier profiling – to identify inherently higher risk industries.
- A risk-based online modern slavery questionnaire.

These elements have been incorporated into the EML Group risk review program since 2021.

## 5. Risk Assessment and Mitigation

The EML Group operates executive management and Risk Management Policies and Frameworks aligned with ISO31000 Risk Management guidelines and is certified to the ISO27001 Information Security Standard for technology. This is supported by a Risk Appetite Statement where the Boards specify and agree to the level of risk it is prepared to tolerate in a number of risk categories. The EML Group has:

- A low tolerance to unknowingly being involved in modern slavery – we undertake due diligence to discover whether modern slavery is caused or contributed to by us and whether we are directly linked to modern slavery through our suppliers and/or our suppliers' direct providers.
- A low tolerance for threats to the safety and wellbeing of people – we take steps to examine and prevent any modern slavery risks identified in our operations or supply-chain.
- A low tolerance to reputational risk – we are proud of our brand and reputation. We reject any involvement in, or connection to unethical or illegal behaviour that could tarnish our brand and reputation.
- A low tolerance for regulatory compliance risk. The EML Group has regulatory obligations to report material breaches of its risk management frameworks and outsourcing arrangements; it is in our best interest to avoid modern slavery risks.

## 6. Due Dilligence and Supply Chain Assurance

During the financial year 2022 / 2023 we:

- Briefed the executive management and the Hospitality Industry Insurance Board on emerging modern slavery risk management requirements.
- Included modern slavery risk management as a standing agenda item in our monthly risk management forum meetings.
- Identified existing material supply contracts based on three criteria:
  1. Major suppliers by spend to a defined dollar threshold.
  2. Suppliers listed in the regulated entities' registers of material of outsourced suppliers.
  3. Suppliers that may present a geographical supply chain risk, where we know, or are reasonably confident, that a current or prospective supplier has operations in countries and regions that have a major exposure to modern slavery practices.

Our source for this information is the latest Global Slavery Index published by the Walk Free Foundation. Current and prospective suppliers will be asked if they have operations in particular 'at risk' countries listed in Africa, The Americas, Arab States, Asia and the Pacific, Europe and Central Asia.
- Interrogated the ABS modern slavery database to extract and examine our suppliers' statements, where they are available.
- Asked relationship managers to request statements from suppliers that have them but are not required to publish them.

- Invited suppliers which do not have statements to complete our short online modern slavery questionnaire.

## 7. Building Capability and Measuring Effectiveness

The EML Group has built experience and capability throughout the organisation and amongst prospective and current suppliers by:

- Addressing the due diligence and supply chain assurance measures noted in section 6.
- Building awareness across the organisation about modern slavery risks and our commitment to addressing them.
- Providing education about modern slavery risk management to nominated individuals with risk management, procurement or supply chain relationship management functions.
- Preparing modern slavery risk management information material for current and prospective suppliers.

## 8. Engagement with Supply Chain Stakeholders

Our key approach to supply chain management is partnership. We are committed to collaborating with our supply chain partners to develop strategies to assess and manage modern slavery risks. We do this by:

- Ensuring we are confident that we have correctly assessed new suppliers who enter our supply chain.
- Encouraging our suppliers to monitor their own, and their suppliers' compliance with our modern slavery risk management principles and to correct any identified deficiencies.
- Requesting suppliers to notify us if they become aware of an actual breach or reasonable likelihood of breaching of modern slavery risk management principles and by providing tools (e.g. portals and helplines) to enable timely reporting.
- Sharing appropriate knowledge and information with our suppliers.

## 9. Reporting

Reporting of modern slavery risks is an integral part of our risk management process, which includes:

- Regular risk reports to executive management and the Hospitality Insurance Industry Limited Board.
- Quality Assurance and performance management of suppliers through periodic checks and audits.
- Addressing breaches of risk tolerances.
- Acting upon anonymous reporting of issues or whistleblowing relating to modern slavery risks.

## 10. Continuous Improvement

Over the next 12 months, we are committed to improving the modern slavery risk management framework described in this statement, including:

- Continuing to provide internal education and awareness.
- Engaging stakeholders on this issue.
- Preparing reports in line with reporting requirements.

Modern slavery risk management requires continuous commitment and ongoing collaboration with suppliers. Over the next 2 years, we will:

- Enhance analysis and reporting of our supply chain.
- Amend supplier contracts, where possible, to incorporate modern slavery clauses.
- Formalise reporting mechanisms and procedures for suppliers as part of work being planned on Environment, Social and Governance (ESG) initiatives.

## 11. Consultation and Approval

The EML Group Risk Management Department updated this Modern Slavery Statement after undertaking a review of the EML Group operations, supply chain, procurement, consideration of modern slavery risks and the development of a risk based approach to managing modern slavery risk through the EML Group triannual risk review program. Consultation was undertaken with Employers Mutual NSW Limited via the respective EML Board and engagement of business unit risk managers. This Statement was approved by members of the Board of Hospitality Industry Insurance Limited on 21 November 2023.



**Greg Pearce**

**Director & Chair**

**Hospitality Industry Insurance Limited**

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