



# Modern Slavery Statement 2020

## INTRODUCTION

This Modern Slavery Statement is made on behalf of CHU Underwriting Agencies Pty Ltd (CHU) pursuant to the *Modern Slavery Act 2018 (Cth)*. This Statement sets out the actions taken by CHU to address modern slavery risks across our business operations and supply chains.

## OUR BUSINESS, STRUCTURE & OPERATIONS

CHU was established in 1978 and is the largest underwriting agency specialising in providing insurance for strata properties like apartments, villas and townhouses. CHU also has related body corporates CHU iSaver Underwriting Agencies (trading as Flex Insurance), and CHU Services Pty Ltd which provide an in house insurance assessing service. CHU is wholly owned by Steadfast Group Limited (Steadfast) which is the largest general insurance broker network and underwriting agency group in Australasia, with growing operations in Asia and Europe. CHU employs 185 people as part of the Steadfast group. CHU has developed strong relationships with carefully selected insurers, brokers, authorised agents and strategic partners that support CHU as an underwriting agency.

## OUR POSITION ON MODERN SLAVERY

We reject any form of modern slavery such as servitude, human trafficking, forced labour and marriage, child labour and debt bondage. We respect the human rights of our employees, clients and those of our suppliers and business partners. We aim to identify and manage risks related to human rights across our business and through our supply chain management. Our position is set out in our Modern Slavery Policy.

## POLICIES & PROCEDURES

CHU is committed to strong corporate governance so that our decisions and actions are based on transparency, integrity and honesty, which promote the long-term sustainability and ongoing success of our business. We strive to maintain high ethical standards in our business practices. We have included our rejection of modern slavery in relevant policies such as our Code of Conduct, Diversity, Anti-bribery and Corruption and Whistle Blower policies as well as our Modern Slavery Policy.

Our Code of Conduct sets out the standards of behaviour we expect of our businesses and employees. In the updated Code, CHU expressly sets out our commitment to human rights by rejecting any form of modern slavery or human trafficking. Our Whistle Blower Policy provides a grievance mechanism for staff and external parties to report concerns about improper conduct by CHU or suppliers including concerns about risk of modern slavery practices.

We have considered how we can help make a difference to some of the world's most pressing social challenges within our sphere of influence, through our 2025 Strategy. We have adopted three key pillars on which we centre our strategy including AI & Technologies, Diversity & Inclusion and Environment & Sustainability. Our commitment to support and uphold human rights is aligned with the UN Guiding Principles on Business and Human Rights.

## ETHICS & CONDUCT

We are proud of our culture and our approach to our Strategy including diversity and inclusion. They are important aspects of our employee attraction, retention and engagement strategy. Building a culture that supports and enables us to achieve our purpose, vision and strategy in an ethical and responsible manner is a strategic priority for CHU. Our expectations on modern slavery apply to everyone who represents CHU, as outlined in our Code of Conduct and our values of 'TOGETHER' (Team, ownership, goals, entrepreneurial, trust, humility, ethical and relationships).

## OUR WORKPLACE

CHU strives to ensure compliance with relevant laws, community expectations and high ethical standards relating to our commitment to human rights and risks of modern slavery practices. We aim to respect differences in beliefs and ideas to foster an inclusive workforce where people are treated with courtesy and dignity. CHU is committed to supporting a safe and healthy workforce for everyone, where discrimination, bullying, harassment and vilification is not tolerated. We have designed programs to actively promote and enhance the health, safety and wellbeing of our employees. We have had no material work, health and safety incidents in the reporting period.



## TRAINING & AWARENESS

CHU is committed to upholding our strong legal, ethical and responsible culture. Our commitment to human rights is part of this culture and is expressly set out in our Modern Slavery Policy. Compliance with this is critical to enable us to deliver our strategy and create long-term value. Our employees must comply with all relevant laws and regulations as well as the technical and ethical requirements of relevant regulatory and professional bodies. Employees are encouraged to report any genuine concerns about modern slavery within our business operations or supply chains.

All CHU employees and businesses are responsible for adherence to ethical, legal, and policy requirements that apply to their employment and for reporting any suspected breaches of law or our Code of Conduct. We have provided our Modern Slavery Policy to all staff and provided some training to assist our staff to understand what modern slavery is, what circumstances may be a risk and how to report any potential issues.

## OUR SUPPLY CHAIN

Our supply chain includes brokers, strata managers, insurers, IT service providers, other service providers and consultancy and professional services firms, located primarily in Australia. Based on sector and supply chain profile, the risk of modern slavery practices is relatively limited. However, CHU acknowledges the potential for indirect exposure to the risk of modern slavery in our business operations and supply chains, such as in office cleaning arrangements, and has attempted to identify these and engage with the relevant party to communicate CHU's position and address any risk of modern slavery.

CHU aims to build supportive, transparent and collaborative relationships with suppliers and strategic partners. We expect our suppliers and strategic partners to take appropriate steps to attempt to ensure that their organisation does not engage in, or inadvertently condone, modern slavery, including that their employees and contractors work in decent and safe conditions, and that no human trafficking, forced labour, child labour or other forms of modern slavery is employed in the delivery of products or services to CHU. We encourage our suppliers and strategic partners to manage their business and supply chain in a manner that upholds human rights and rejects modern slavery.

The following steps have been taken to address modern slavery risks within our supply chains:

- in new contractual arrangements, we endeavour to specifically refer to modern slavery and require both parties to use reasonable endeavours to avoid modern slavery practices, including a reporting and audit right

- implemented processes to respond to risks of modern slavery practices through our whistle blower policy
- identified the broad operations and overall supply chain structure where modern slavery risks are likely to be most significant.

## STEPS TAKEN

We strive to act legally, ethically and responsibly in all our dealings. CHU generally deals with other businesses that have an established reputation in the marketplace for high ethical standards, compliance with legal requirements, and good corporate culture. CHU has a formal process of due diligence whereby research is conducted to identify, assess, mitigate and monitor inherent risks before proceeding with new strategic partners, brokers and businesses. The potential parties must be approved by the executive prior to onboarding.

In compliance with the *Modern Slavery Act 2018 (Cth)* and as part of our strong legal, ethical and responsible culture, CHU has:

- engaged in discussions on modern slavery risks at the senior executive level;
- begun to review our business operations and supply chains to identify risks of modern slavery practices, focussing on areas of higher risk;
- provided our staff with the CHU policy and communication on modern slavery to increase awareness;
- established a process to ensure all new contractual arrangements and amendments of any contractual arrangements to include a modern slavery clause;
- published our Modern Slavery Policy on our website.

At this stage, detailed due diligence has not been undertaken of our major insurance partner QBE Group as we regard the risk of modern slavery in their operation as low in light of the extensive commitment to human rights broadly expressed by QBE the regulatory regime to which they are subject and their commitment to corporate and social responsibility.

## GRIEVANCE PROCESS

CHU has established grievance channels through our Whistle Blower Policy, for employees and supplier use in managing modern slavery risks. Should any concerns be identified, CHU would conduct any required investigations in accordance with regulatory requirements, policies and procedures. Further details are provided in our Whistle Blower Policy with regards to our investigation process. There have been no reports of modern slavery or human trafficking through our whistle blower arrangements as of the date of this Statement.



## REMEDIATION PROCESS

Our approach to remediation is to address each issue as it arises, on a case-by-case basis and apply principles of fairness, and respect for human rights. No remediation has been required as of the date of this Statement, although the processes and procedures have been put in place, which are designed to reduce the risk of modern slavery practices within our business operations and supply chains.

## CONTINUOUS IMPROVEMENT

We aim to create an enhanced understanding of modern slavery risks within our business operations and supply chains by:

- improving relevant policies and commercial arrangements to reference modern slavery
- including a modern slavery audit question to the annual authorised representative audit review
- improving staff awareness of modern slavery risks
- enhancing due diligence and risk management processes for selection and screening of potential partners and suppliers to include consideration of modern slavery risks
- further developing our audit of our supply chain to identify risks of modern slavery
- developing a process to assess the effectiveness of our actions in attempting to ensure no modern slavery in our business operations or supply chains
- assessing our practices and procedures against the requirements of the *Modern Slavery Act 2018 (Cth)*.

This Modern Slavery Statement was approved by the Boards of CHU Underwriting Agencies Pty Ltd.

Signed for and on behalf of the Board of  
CHU Underwriting Agencies Pty Ltd.



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**Kimberley Jonsson**

CEO

CHU Underwriting Agencies Pty Ltd

11 December 2020