

Modern Slavery Statement 2020

This Statement is made pursuant to the Modern Slavery Act 2018 (Cth) jointly by Genworth Mortgage Insurance Australia Limited ABN 72 154 890 730 and Genworth Financial Mortgage Insurance Pty Limited ABN 60 106 974 305 for the financial year 1 January to 31 December 2020 (2020 Year). This Statement is their first Modern Slavery Statement. It sets out the actions to date taken by them to identify and address modern slavery risks across their business operations and supply chains.

About us: structure and operations

Genworth Mortgage Insurance Australia Limited (GMA) is an Australian public company listed on the Australian Securities Exchange (ASX: GMA). Its wholly owned direct and indirect subsidiaries are Genworth Financial Mortgage Insurance Pty Limited (GFMI), Genworth Financial Mortgage Indemnity Limited and Balmoral Insurance Company Limited (collectively Genworth, we, our or us).

Genworth Mortgage Insurance Australia Limited and Genworth Financial Mortgage Insurance Pty Limited are reporting entities under the Modern Slavery Act 2018 (Cth).

Genworth's principal business activity during 2020 Year was the provision of Lenders Mortgage Insurance. Genworth has been a leading provider of Lenders Mortgage Insurance in Australia for over 50 years, having been established as the Housing Loans Insurance Corporation in 1965 by the Federal Government.

Lenders Mortgage Insurance facilitates residential mortgage lending by transferring risk to an insurer and is predominately used in connection with high loan-to-value ratio residential mortgage loans.

Genworth uses centralised procurement, risk, human resources, finance, operations and legal functions to conduct operations across all entities of Genworth.

Genworth adopts the same policies, practices and procedures relevant to modern slavery across all entities of Genworth. Genworth also engages many of the same suppliers across all entities.

Our position on Modern Slavery

Genworth is committed to upholding the human rights of all workers and acknowledges the fundamental entitlement of all human beings to liberty and dignity. We endeavour, and expect our suppliers, to respect the standards in the UN Universal Declaration of Human Rights, UN Guiding Principles on Business and Human Rights, International Labour Organisation on Fundamental Principles and Rights at Work in all business operations and supply chains.

Our Values

Genworth is committed to implementing the highest professional and ethical standards in our business practices. To uphold and support these standards our people are accountable for demonstrating our Values in everything they do.



Have courage; do what's right



Experiment; embrace change; adapt



Work together to deliver on our commitments



Be accountable; plan; get it done



Listen; be relevant; be flexible

Our Values underline our culture and help form the standard of behaviour we expect from our people.

Genworth is committed to maintaining the highest standards of corporate governance to support Genworth's long-term performance and sustainability and seeks to continually improve its governance and risk management frameworks. This commitment incorporates interactions with Genworth's shareholders, customers, our people, regulators and the community. Genworth's governance practices are underpinned by regulatory responsibilities including GMA and GFMI as Australian Prudential Regulation Authority regulated entities, and GMA as a listed entity.

Genworth is committed to:

- ethical and sustainable business practices
- upholding human rights
- the highest workplace standards.

Our policies

Genworth has various policies in place to promote good practices and behaviours and to protect the human rights of our people and suppliers. These policies include:

- Anti-bribery and Corruption Policy
- Diversity and Inclusion Policy
- Family Violence Awareness Policy
- Integrity First
- Outsourcing Policy
- Procurement Policy
- Supplier Code of Conduct
- Sustainability Policy
- Whistleblower Policy
- Workplace Health and Safety Policy
- Workplace Standards Policy.

These policies are available on Genworth's intranet. The majority of these policies or policy summaries are also publicly available and can be found here [Genworth - Investor Centre](#).

Code of ethics

Genworth acknowledges the need for high standards of corporate governance practice and ethical conduct by all directors and employees of Genworth.

Genworth has adopted a code of conduct, Integrity First, which sets out Genworth's commitment to maintaining high levels of integrity and ethical standards in its business practices. The code of conduct sets out for all directors, management and employees the standards of behaviour expected of them.

The code of conduct sets out Genworth's policies on various matters, including conflicts of interest, discrimination and harassment, corrupt conduct, occupational health and safety and insider trading.

Our supply chains

Genworth aims to build supportive, transparent and collaborative relationships with suppliers and strategic partners.

We recognise the key role of Genworth and our suppliers in positively contributing to the social, economic and environmental wellbeing of the communities that we are part of.

Our Supplier Code of Conduct sets out the standards of behaviour we expect of Genworth, our people and our suppliers. Genworth will not tolerate any form and presence of human trafficking, slavery and slavery-like practices and child labour within its business operations or that of its suppliers. Our Supplier Code of Conduct can be found here [Genworth - Investor Centre](#).

We believe in mutual commitments between Genworth and our suppliers, to operate in accordance with community expectations of businesses, and create a more sustainable value for all our stakeholders. Genworth will work collaboratively with our suppliers to foster a relationship that aligns with the standards in the Supplier Code of Conduct and the interests of our stakeholders.

Our supply chain includes IT service providers, investment managers, reinsurers, professional service and consultancy firms and other service providers.

Our suppliers are located in Australia and overseas. Given the nature of our industry and supply chain, the risk of modern slavery occurring is limited and Genworth takes steps to identify, assess and manage the risk as set out in this Statement.

There were no identified instances of exploitative practices or human rights abuses in our supply chain in the 2020 Year.

Our people

People are at the heart of what we do and our people reflect the diversity of our customers and the communities they serve.

Genworth values the contribution that people with different backgrounds, experience and perspectives bring to our organisation. We are committed to building a diverse and inclusive workplace and this is reflected by our strong support of flexible and inclusive work practices across the organisation.

Genworth has no modern slavery risks in its direct business operations that are directly undertaken by our people and which are covered by our policies, practices and processes.

Training

All our people receive annual training to understand what modern slavery is, the Modern Slavery Act, the impact to the business and its customers, and what actions they can take.

Our people are familiarised with our code of conduct, Integrity First, and our Workplace Standards Policy through annual online training and an acknowledgement that they have read and understood Genworth's expectations regarding the required standard of workplace behaviour. Our people also receive annual training on anti-discrimination and anti-bullying and anti-harassment in addition to other courses.

Corporate sustainability

Genworth is committed to making a positive contribution to the communities that we are part of. Our Sustainability Framework reflects the important environmental, social and governance (ESG) matters that we believe are critical to achieving business objectives and long-term value for all stakeholders. The Framework is structured around four pillars (Environment; Our People; Community; and Marketplace), highlighting the areas identified as being those most material to the business and of greatest relevance to stakeholders.

Our Sustainability Policy can be found here [Sustainability policy](#) and Sustainability Reports can be found here [Sustainability reports](#).

Whistleblower policy

Genworth maintains a strong whistleblowing policy and procedure that promotes proper and ethical professional conduct in the workplace.

Our people can report to their manager or, if they wish, our people and third parties are able to report through our independently operated whistleblower service provider. Genworth expects its suppliers to uphold its values and workplace standards; they are encouraged to report on any concerns about their relationship with Genworth.

Actions to assess and address risk

The following steps have been taken to identify and address modern slavery risks within Genworth's supply chains:

- Genworth has considered relevant government and industry guidance on the assessment of modern slavery risks
- Genworth has developed a Supplier Code of Conduct that states Genworth will not tolerate any form and presence of human trafficking, slavery and slavery-like practices and child labour within its business operations or that of its suppliers
- Our Sustainability Policy has been updated to include Genworth's commitment to upholding human rights and the highest workplace standards
- Due diligence and a risk assessment was conducted by Genworth of all suppliers that provide goods and services directly to Genworth by taking into account each supplier's risks of modern slavery practices due to the supplier's geographic location, industry type and the nature of its workforce
- Genworth has developed standard contractual requirements that impose an obligation on suppliers to not use any form of forced labour, slavery or servitude and to adhere to Genworth's Supplier Code of Conduct
- Genworth has sought to include our standard contractual requirements into contracts with those existing suppliers that we have assessed as being at a higher risk of modern slavery practices taking into account the supplier's geographic location, industry type and the nature of their workforce. Genworth will also seek to include standard contractual obligations upon renewal of existing supplier contracts and when entering into new supplier contracts
- Genworth review suppliers approaches to modern slavery risks and the steps they have taken to minimise those risks by reviewing relevant policies and documentation they provide to us
- Genworth has required relevant employees to undertake online training to assist them to understand what modern slavery is, the requirements of the Modern Slavery Act, what circumstances may be a slavery risk and how to report any potential issues or concerns
- Presentations have been made available to our people on modern slavery awareness including the requirements of the Modern Slavery Act
- Genworth has reporting procedures and mechanisms where our people and third parties can report any concerns regarding unethical or illegal conduct, including in relation to modern slavery. Our people can report to their manager or, if they wish, suppliers and other third parties are able to report through our independently operated whistleblower service provider.

Consultation

GMA and GFMI consulted with each other in the preparation of this Statement.

Genworth's procurement team centrally coordinated Genworth's identification, assessment and management of modern slavery risks for all entities of Genworth.

The consultation within the key areas of our business and relevant personnel to prepare this Statement included the centralised procurement, risk, human resources and legal teams.

Effectiveness of actions

Genworth continues to assess the effectiveness of the actions we undertake to identify and address modern slavery risk.

Genworth may conduct regular assessments of the conduct and practices of our suppliers and contractors with the standards of the Supplier Code of Conduct. These assessments may include self-assessments by suppliers, requests for supporting documents, audits and other material and direct engagements with Genworth. During these assessments with Genworth, we expect that our suppliers provide us with full and frank responses when reasonably requested.

Remediation

Genworth did not have to remediate an instance of modern slavery risk in the 2020 Year. Genworth's approach to remediation is to address each issue as it arises and uphold our commitments to:

- Ethical and sustainable business practices
- Upholding human rights
- The highest workplace standards.

On-going activities

The next phase of Genworth's approach to identifying and assessing modern slavery risks in our business operations and supply chain is expected to include:

- Collaboratively engaging across our various stakeholders to continue to assess and address modern slavery risk in our supply chain
- Refresher training of our people and the training of new hires
- Maintaining awareness of modern slavery risks in the context of our wider view of economic, social and governance factors
- Conducting further risk assessments and due diligence on suppliers as required
- Developing processes to assess the ongoing effectiveness of our actions in attempting to address modern slavery risk in our business operations and supply chains.

This Statement was approved by the Board of Genworth Mortgage Insurance Australia Limited and Genworth Financial Mortgage Insurance Pty Limited.



Pauline Blight-Johnson

Chief Executive Officer and Managing Director,
Genworth Mortgage Insurance Australia Limited
and Genworth Financial Mortgage Insurance Pty
Limited 06 May 2021