



HEALTHIER, LONGER,  
BETTER LIVES

# MODERN SLAVERY STATEMENT

# Modern Slavery Statement

This Modern Slavery Statement (“Statement”) is made pursuant to the Modern Slavery Act 2018 (Cth), by AIA Australia Limited (ABN 79 004 837 861), including AIA Financial Services Pty Limited (ABN 68 008 540 252), CMLA Services Pty Limited (ABN 88 622 557 251), Jacques Martin Pty Limited (ABN 55 006 100 830) and Jacques Martin Administration and Consulting Pty Limited (ABN 24 006 787 748), collectively referred throughout this Statement as “AIA Australia”.

This Statement covers the financial year 1 January 2021 to 31 December 2021 for AIA Australia Limited and AIA Financial Services Pty Limited, and 1 April 2021 to 31 December 2021 for CMLA Services Pty Limited, Jacques Martin Pty Limited and Jacques Martin Administration and Consulting Pty Limited.

This Statement was approved by AIA Australia Limited’s Board on 25 May 2022.

AIA Australia has a purpose of making a difference in people’s lives; this not only applies through its life and health insurance products and its wellbeing programs including AIA Vitality, but through its community initiatives, partnerships and by embracing shared value to help its employees, their families, its customers and the community to live healthier, longer, better lives.

Modern slavery can be present in any industry, including the financial services industry in Australia. The term ‘modern slavery’ includes circumstances where an individual or group of people are exploited or deprived of freedom by means of coercion, deception or threats.

This Statement outlines AIA Australia’s objection to any form of modern slavery, its process for the identification of any risks, and the controls it has in place to address them appropriately.

# AIA Australia's commitment

**AIA Australia takes its obligations under the Modern Slavery Act seriously and is committed to protecting human rights and combatting modern slavery across its operations and global supply chains.**

In line with its focus on doing the right thing, AIA Australia acknowledges it has a corporate and social responsibility to support this concept beyond its interactions with its customers and into society at large.

## About AIA Australia

AIA Australia is a life, health and wellbeing insurance specialist. It offers a range of products that protect the financial health and wellbeing of more than 3.6 million Australians. AIA Australia's head office is based in Melbourne and it employs over 2,200 staff across Australia. AIA Australia is a member of the AIA Group, which is incorporated and headquartered in Hong Kong with a presence in 18 markets across the Asia-Pacific region.

AIA Australia's customer value proposition is focused on Life, Health and Wellbeing. This is underpinned by AIA Australia's Operating Philosophy and to provide value and security to its customers.

## AIA Australia's Operating Philosophy

Doing the Right Thing, in the Right Way, with the Right People, and the Results will come.

Building a truly healthy culture starts with our shared values and common purpose. This also means that our Operating Philosophy starts with our people. We see our commitment to protecting human rights, combatting modern slavery and enabling all people to live and work freely as more than a compliance activity and is foundational to our commitment to the health and wellbeing of our people, customers and suppliers, and strive to design our recruitment and employment practices that not only protect basic human rights and freedoms, but enable overall health and wellbeing.



# Risk of modern slavery

## AIA Australia's operations

AIA Australia's operations are primarily Australian based and predominantly executed in house with only small parts of its team supported by its partners in offshore locations. Our partnerships with offshore service providers are carefully selected and managed with modern slavery considerations front of mind throughout the engagement and management of these teams.

Our operations include our Financial Wellbeing Advisors, Claims Management, Customer Care, Distribution and Product Design functions, as well as our enablement functions including Finance and Actuarial, Legal, People and Culture and Technology.

With the majority of our team operating in house and in office or home environment and our employment practices aligned to Australian and International law, the risks of domestic modern slavery including forced labour, servitude, child labour, deceptive recruitment and debt bondage are considered low.

## AIA Australia's supply chains

AIA Australia's supply chains are primarily Australian based and include suppliers and services related to administration, banking, communication, consulting, investment management, IT, marketing, office supplies, operations, property and facility management, reinsurance and travel.

AIA Australia also works closely with major Australian financial institutions, corporate partners, financial advisers and affinity partners to deliver and supply its products and services across Australia. AIA Australia seeks to do business with suppliers and business partners that hold similar values and beliefs to those described above.

AIA Australia understands that there are potential risks of inadvertently contributing to modern slavery directly and indirectly through third-party supply chains and investments. Identifying and assessing those risks in our supply chain is key to mitigating and remediating impacts on modern slavery. These risks include, but are not limited to:

- the risk of underpayment of employees in onshore suppliers commonly using migrant labour;
- the risk of underpayment of employees in offshore IT suppliers in countries with less developed labour laws and enforcement; and
- the risk of child labour, forced labour, underpayment and restriction of freedom in countries with less developed labour laws and enforcement.





# AIA Australia's approach to managing modern slavery risks

## Governance

At AIA Australia, we have a robust governance structure that oversees enterprise risks, including the management of modern slavery risk. Our governance structure includes:

- AIA Australia Board
- AIA Australia Board Business Risk and Compliance Committee
- AIA Australia Enterprise Risk Management Committee

## Principles, policies and standards

AIA Australia has various principles, policies and standards in place to govern conduct, and assess and address risks relating to modern slavery. These include:

- AIA Group Operating Philosophy
- AIA Group Code of Conduct
- AIA Australia Whistleblower Policy
- AIA Australia Modern Slavery Risk Standard

In addition, AIA Australia's investment decisions are guided by the AIA Group Investments' Environmental, Social, and Governance Standard.

## Managing modern slavery risk

Our assessment of the modern slavery risk in our operations and our supply chain is "low". Our processes to ensure identification and monitoring of the modern slavery risk include, but are not limited to:

- Initial supplier risk assessment and due diligence for new suppliers
- Initial due diligence for new contract
- Annual risk-based due diligence with selected suppliers based on questionnaire and attestation from the selected suppliers on compliance with the Modern Slavery Act and the AIA Group Code of Conduct. Suppliers are selected in consultation with the Enterprise Risk function based on a risk-based approach.

- Selected employees undertake training in modern slavery to increase awareness, knowledge and understanding of modern slavery risk amongst its operations and supply chain.

## Grievance mechanism

AIA Australia encourages reporting of any misconduct or improper state of affairs. To support this, AIA Australia has a grievance mechanism and provides several channels to report concerns and complaints, with the option to do so confidentially and anonymously under the Corporations Act. The grievance mechanism can be used by anyone, including current or former employees, suppliers' employees, contractors or business associates, or relatives or dependents of the above.

AIA Australia takes all reports seriously, and manages any suspicion of modern slavery risk while always keeping the protection of the victim as a priority by adopting a victim-based approach.

## Process of consultation

AIA Australia entities operate under a common set of governance policies, standards and processes, managed by enterprise-wide functions such as Procurement, Human Resources and, Risk and Compliance, and enterprise-wide management committees. This includes the monitoring of modern slavery risk in our operations and supply chains.

The Boards of AIA Financial Services Pty Limited, CMLA Services Pty Limited, Jacques Martin Pty Limited and Jacques Martin Administration and Consulting Pty Limited have reviewed and approved this Statement.



# Other relevant information

In March 2022, AIA Group, AIA Australia's parent entity, issued its new transformational, long-term Environmental, Social, and Governance Strategy (ESG Strategy), reflective of its position as a global industry leader. AIA Group is aware of the social and environmental issues that our communities face, and is committed to overcoming them in a sustainable and ethical fashion.

In line with this, AIA Australia confirms it remains committed to not only act in accordance with the Modern Slavery Act, but to ensure that it is acting ethically and responsibly and in accordance with the highest standards.



**Chair**  
AIA Australia Limited



**Company Secretary**  
AIA Australia Limited



**AIA Australia**

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