

Crawford & Company (Australia) Pty Ltd Modern Slavery and Human Trafficking Statement 2024

This Modern Slavery Statement (“Statement”) is made under the Australian Modern Slavery Act 2018 (Cth) (“MSA”) and sets out the actions taken by the Crawford & Company Australia Pty Ltd to assess and address modern slavery risks in our operations and supply chains during the year ended 31 October 2024. (“FY24”).

Crawford & Company Australia Pty Ltd (“Crawford” or “Crawford Australia”) is an Australian private company (ABN 11 002 317 133), registered at: Level 3, 324 St Kilda Road, Southbank, Victoria, Australia.

This Statement is Crawford’s fifth Statement and is a single Statement on behalf of Crawford and its controlled entities. This includes reporting entities which are wholly owned subsidiaries, as well as other entities over which Crawford has control. A list of the reporting entities covered by this Statement, and other controlled entities that do not meet the threshold for reporting entities, is provided in Appendix 1. The information set out in this Statement is provided as a consolidated description for Crawford. In this Statement reference to ‘Crawford’, ‘Crawford Australia’, ‘we’, ‘us’ and ‘our’ is to the identified entities set out in Appendix 1.

This Statement was reviewed by Crawford’s AVP Global Compliance Office (Asia Pacific) and Chief Ethics and Compliance Officer before Board approval, and

endorsement by the Crawford Australia President and Executive Committee. Further details on consultation with reporting and controlled entities are provided in the Statement.

This Statement was approved by the Crawford & Company (Australia) Pty Ltd Board on behalf of all reporting entities (acting as a higher entity under section 14(2)(d)(ii) of the Australian MSA) on 13 December 2024 and is signed by the President (Australia) and a Director of the Crawford & Company (Australia) Pty Ltd Board.



Jonathan Hubbard
President (Australia) & Director



Introduction

Founded in 1987, Crawford Australia operates 36 offices with over 600 professionals across the country. While addressing modern slavery beyond our first-tier suppliers presents challenges, we remain committed to strengthening our efforts to combat it. We collaborate with regulators, businesses, and society to meet our ethical obligations.

Integrity is at the core of Crawford and what we do. We uphold ethical standards and legal compliance in our supply chain through our global Code of Business Conduct and Ethics, with a strong commitment to respecting and supporting human rights at all levels of our organisation.

This Statement outlines our actions to manage slavery globally in FY24 and highlights our progress, achievements, and areas for future improvement. While focusing on slavery risks, we also affirm our responsibility to respect all internationally recognised human rights, as outlined in our global Code of Business Conduct and Ethics and Anti-Slavery Policies.

Key areas of action in 2023-2024



Crawford has enhanced our governance oversight and risk management processes for vendors, suppliers, and business partners. This includes refining and improving our third-party risk management framework and related screening processes.



Crawford has continued to invest in our vendor/supplier management tool to ensure transparency throughout our business relationships, from the screening process to due diligence and engagement with vendors/suppliers.



Crawford has made anti-slavery a key pillar of our Global Compliance Office strategy and partnered with one of Australia's leading law firms to support the development and growth of our anti-slavery program.

How does our 2024 Statement build on our 2023 Statement?

Crawford are committed to being transparent in our commitment to anti-slavery and our journey of improvement.

This statement outlines our progress to date and some of the key actions taken to address anti-slavery.

Progress against our objectives



Crawford leverages our global footprint and scale to enhance our ability to screen and select the businesses we engage with.



We are using the Crawford Australia program as the benchmark for our global anti-slavery efforts across the business (where legally permissible).



We have made significant investments in our anti-slavery program by engaging external counsel to support its continued development and maturity.



We are developing enhanced self-paced online modules tailored to staff roles, helping them identify and respond to slavery or potential slavery.

Structure and operations

Crawford is headquartered in Melbourne, Victoria and is a private company. Crawford is wholly owned by Crawford & Company, a United States based headquartered in Atlanta, Georgia USA. Crawford provides insurance claims solutions for insurance brokers, insurance carriers, and self-insured entities. Crawford Australia has offices in all states and territories and is comprised of four primary operating segments which work together as an integrated portfolio to create our ‘One-Crawford’ offering:

- Legal Services
- Loss Adjusting
- Platforms and Networks
- Third Party Administration

There has been no change to our operating segments, their core business or their brands in FY24.

Operation	Overview	Brands
Legal Services	Crawford's wholly owned law firm HBA Legal is made up of defendant insurance law specialists working across casualty, professional indemnity, public liability, cyber risk, workers' compensation, workplace health & safety, employment law, motor injury, health law and more.	<ul style="list-style-type: none">• Crawford Legal Services• HBA Legal <div>Crawford® hba legal.</div>
Loss Adjusting	Crawford's loss adjusters work on behalf of insurers to investigate cause and circumstance, following lodgement of an insurance claim, and assess the correct sum to be paid or ascertain what repairs are necessary.	<ul style="list-style-type: none">• Crawford• Global Technical Services (GTS)• Crawford Forensic Accounting Services (CFAS)• CRD Building Consultants and Engineers <div> Crawford® Building Consultants & Engineers®</div>

Operation

Overview

Brands

Platforms and Networks

Contractor Connection is one of the largest networks of trades professionals in Australia, providing repairs and restoration services to insurance policyholders, on behalf of insurers

- Crawford Contractor Connection
- WeGoLook

**CONTRACTOR
CONNECTION**
BY CRAWFORD & COMPANY

Third Party Administration

Crawford TPA is a full end-to-end outsourcing claims management solution largely servicing insurers, self-insured clients, and large corporates when claims are made against them.

- Broadspire
- Crawford TPA


Crawford

Our purpose and values

For over 80 years, these principles have been embedded in Crawford's culture, shaping the company's ongoing commitment to putting people first and delivering the highest quality service for its customers. Taking action to manage our modern slavery risks align to our values and ensuring that we maintain a culture that practices integrity and ethical behaviour.



Our Purpose - Restoring lives, businesses, and communities.

Our Values - Our purpose is embedded in our values – to **RESTORE** is part of everything we do.

Our workforce

Our workforce consists of more than 692 employees, who are all employed directly by Crawford and in accordance with relevant national employment legislation. Over 91.2% are operational roles, with the remaining staff providing support services such as finance, human resources, information technology, and legal and compliance.

We are aware of the risks associated with temporary and migrant workers, and as a new addition to this statement included in the above figures are 55 employees who were engaged on a temporary or short-term basis and 116 employees who were employed on a migrant visa. 42 of these staff now have ongoing employment with Crawford.

Operation	Number of Employees (Headcount)	Full time %
Legal Services	118	62.2%*
Loss Adjusting	456	85.1%
Platforms and Networks	31	93.5%
Third Party Administration	26	92.3%
Other	61	85.2%

*Legal Services includes HBA Legal's on demand workforce: Pillion

Our clients

Our clients are predominantly related to the insurance industry, encompassing insurance carriers, insurance brokers, and self-insured entities. This specialised focus allows us to deeply understand the unique challenges and complexities faced by our clients in the insurance sector. We work closely with insurance carriers to provide end-to-end claims management solutions. Our expertise in the insurance industry enables us to provide strategic guidance, innovative solutions, and reliable support to our clients.

Our supply chain

Our supply chain encompasses a wide range of suppliers, who contribute to our operations. These service providers play a vital role in supporting our business functions and delivering quality services to our clients.

Our supply chain includes predominantly service providers such as cleaning services who maintain our office spaces, recruitment partners who assist us in sourcing qualified talent, training providers who help enhance our employees’ skills and knowledge, professional associations that enable us to access valuable industry resources and networks.

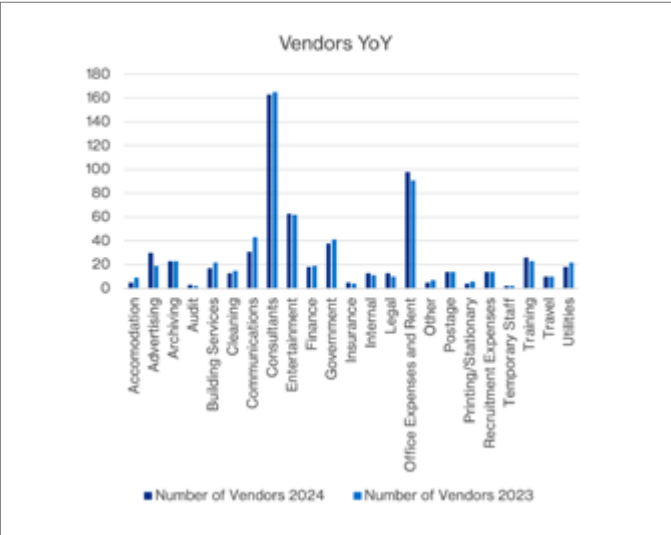
We also engage suppliers for things such as stationary supplies, travel arrangements, transportation,

Operation	Percentage of Australian Clients*	Percentage of International Clients*
Legal Services	91%	9%
Loss Adjusting	82%	18%
Platforms and Networks	96%	4%
Third Party Administration	88%	12%

*The above data is presented as a rounded approximation

accommodation, as well as logistics and postage solutions to meet our operational needs. By maintaining strong relationships with our diverse range of suppliers, we ensure the smooth functioning of our business and deliver value to our customers.

We have continued our efforts to transition our entire supply chain into our third-party vendor tool to ensure that all suppliers are appropriately screened prior to working with Crawford – and where these suppliers are deemed a suitable provider; their onboarding and offboarding. We have additionally, this year included additional data to show vendors by category in comparison to the previous year, as well as the percentage of spend against our total spend for each category.



Risks of modern slavery practices in our operations and supply chains

Modern slavery is a critical risk in both operations and supply chains. The complexity and global nature of a modern organisation like Crawford involve vast networks of suppliers, which can make it difficult to maintain full oversight and control over labour practices. This lack of transparency can increase the risk of modern slavery, as exploitative individuals or groups may take advantage of gaps in monitoring. Beyond that, the increasing pressure to deliver services quickly and at low cost can sometimes incentivise suppliers to cut corners, leading to the potential use of forced or bonded labour.

To mitigate these risks, Crawford has well established due diligence procedures on the people we do business with examples include our comprehensive policies and procedures including our third-party risk management policy and the rigorous supplier screening program. These efforts are led by our global Third-Party Risk Management team, whose goal remains to identify and address any cases of modern slavery within our operations and supply chain.

Actions taken to assess, and address identified modern slavery risks

Assemble

- Maintain appropriate resources and processes in place to support our third party and vendor screening processes.
- Empower our workforce to report any behaviours of concern.

Assess

- Evaluate current process for measurement, disclosure, and reporting.
- Identify gaps through a variety of lenses (people, process, systems, and technology)

Aspire

- Identify and engage stakeholders to better identify suppliers beyond line-one vendors
- Define and operationalise cross functional vendor screenings.

Aware

- Keeping the Board and leadership informed of regulatory changes
- Ensuring all staff are aware of our anti-slavery policy, third-party risk management policy and procurement due diligence procedures.

Act

- Build processes and capabilities to deliver on the strategy
- Partner with best-in class vendors for market-based data, indicators for reporting, disclosure, and advice
- Embed actions and measure performance



Assessing the effectiveness of our actions

We recognise the importance of assessing the effectiveness of our actions in addressing modern slavery risks within our supply chain. To improve and strengthen our efforts, we continue to proactively evaluate, and address identified risks.

A key step in this process has been the continuous improvement of our third-party risk management policy and due diligence procedures to better identify and mitigate potential modern slavery risks in our supply chains. We are not losing focus on the importance of continuing to develop and improve, as demonstrated by including 'Anti-Slavery' as a strategic pillar for our Global Compliance Office. We have engaged a highly regarded Australian law firm to partner with Crawford and consider our current program – this includes policies, procedures, and training material to further enhance and develop our program with the intention of incorporating these improvements into Crawford's global framework. Through these measures, we are continuously improving our approach to combat modern slavery and foster responsible business practices across our organisation.

Consultation with reporting entities and owned or controlled entities

In accordance with s.16.1 (f) of the Modern Slavery Act (Commonwealth) 2018, Crawford has an obligation to consult with owned or controlled entities which are listed in Appendix 1. This Statement was developed through a group consultation process and each of these entities are involved on an ongoing basis in the activities involved in the prevention and active monitoring of our anti-slavery risk management approach.

Consultation process

Crawford's legal and compliance department oversees the group's ethics, regulatory compliance, risk management, and third-party risk management functions, including vendor/supplier due diligence processes.

The legal and compliance team is responsible for engaging with all entities within the Crawford group, and this Statement is no exception. The consultation process involved key individuals and teams, including finance, procurement, and human resources, to identify, mitigate, and manage potential modern slavery risks in our operations and supply chains. This collaboration ensured the Statement aligns with our group approach to modern slavery and reflects ongoing engagement with internal stakeholders.

The Statement was reviewed by the AVP of Global Compliance for the Asia Pacific region, Crawford's group Chief Ethics Officer, and endorsed by the Australia President and Executive Committee before being approved by the Crawford Australia Board.



Appendix 1: List of reporting entities and owned or controlled entities

- Crawford & Company (Australia) Pty Ltd¹
- Broadspire (Australia) Pty Ltd²
- HBA Legal Pty Limited³
- Paratus Claims Pty Limited⁴
- Pillion Pty Limited⁵
- WeGoLook AUS Pty Ltd⁶

¹These entities are reporting entities for the purposes of the Australian Modern Slavery Act.

²This entity is not a reporting entity for the purposes of the Modern Slavery Act but have been included in this list in the interest of transparency.

³This entity is not a reporting entity for the purposes of the Modern Slavery Act but have been included in this list in the interest of transparency.

⁴This entity is not a reporting entity for the purposes of the Modern Slavery Act but have been included in this list in the interest of transparency.

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