



STRATA  
COMMUNITY  
INSURANCE

# MODERN SLAVERY STATEMENT

**REPORTING PERIOD ENDING 30 JUNE 2025**

Australian Strata Community Group Pty Limited  
ABN 70 166 256 257

Strata Community Insurance Agencies Pty Limited  
ABN 72 165 914 009, AFSL 457787

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## ABOUT THIS STATEMENT

This is the first Modern Slavery Statement for Strata Community Insurance Agencies Pty Ltd (ABN 72 165 914 009, AFSL No. 457787) (Strata Community Insurance), as part of our obligations under the *Modern Slavery Act 2018 (Cth)* (the Act). It is submitted as a joint statement for purposes of section 14 of the Act on behalf of Strata Community Insurance and Australian Strata Community Group Pty Ltd (ABN 70 166 256 257) (ASCG). It references Strata Community Insurance's activities within our financial year 2025, for the reporting period ending 30 June 2025.

## MANDATORY REPORTING CRITERIA

This Statement was prepared to meet the mandatory reporting criteria set out under section 16 of the Act:

- Identify the reporting entity.
- Describe the structure, operations, and supply chains of the reporting entity.
- Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and entities that the reporting entity owns or controls.
- Describe the actions taken by the reporting entity and entities that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes.
- Describe how the reporting entity assesses the effectiveness of such actions.
- Describe the process of consultation with any entities that the reporting entity owns or controls, and in the case of a reporting entity covered by a statement under section 14 - the entity giving the statement.
- Include any other information that the reporting entity, or the entity giving the statement, considers relevant.

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## ABOUT STRATA COMMUNITY INSURANCE

Strata Community Insurance is the principal operational and wholly owned subsidiary of ASCG. We are a privately-owned strata and community title insurance specialist underwriting agency holding an Australian Financial Services Licence to advise on and deal in general insurance products and provide claims handling and settling services. We act under a binding authority to market, underwrite, settle claims, and administer general insurance policies on behalf of Allianz Australia Insurance Limited.

Our business was founded, is owned, and is staffed by a group of Australia's most experienced strata insurance professionals, and designs and builds specialist insurance products and services for the strata and community title sector Australia-wide.

Our directors have strata and community title insurance experience spanning five decades across six countries, including some of the world's most challenging markets.

Our workforce of over 150 employees across major Australian states comprises some of Australia's most distinguished and experienced strata insurance practitioners, serving strata managers, insurance brokers, and those living in or owning strata properties.

## OUR PURPOSE, VISION & VALUES

At Strata Community Insurance we have the purpose to be the champion for a better, brighter strata community, and to deliver on our strategic vision to be the insurance partner of choice for the strata community. Our purpose and vision guide our actions and drive ethical conduct reflecting our values.

### OUR PURPOSE

Champion for a better, brighter strata community

We are dedicated to being the bold advocates for the strata community. We exist to support, empower, and protect its members, and have the courage to find better ways so they may thrive.

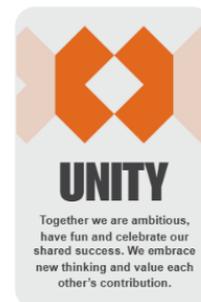
### OUR VISION

Insurance partner of choice for the strata community

We are committed to setting the standard for excellence, responsiveness, and value. Using our global experience and insight, we innovate to make a positive impact on those who entrust us to protect them.

### OUR VALUES

Our values are an anchor point that support how we deliver for the strata community and our strategy.



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## OUR COMMITMENT TO HUMAN DIGNITY

Slavery offences are criminal offences with universal jurisdiction, meaning they can apply to conduct occurring anywhere and regardless of the offender's nationality or residence.

The term "Modern Slavery" refers to situations where coercion, threats or deception are used to exploit victims and deprive them of their freedom. It can take many forms, such as human trafficking (encompassing cross-border and domestic trafficking, child trafficking, and harbouring victims), slavery, and slavery-like practices (such as forced labour, forced marriage, servitude, debt bondage, and deceptive recruiting). Modern slavery also includes the worst forms of child labour.

## COMBATING MODERN SLAVERY

At Strata Community Insurance, we respect human rights and aim to maintain the highest ethical standards. We are committed to behaving with integrity and transparency, and to defending the dignity of any person who experiences vulnerability in our operations and supply chains. We are committed to addressing modern slavery risks - protecting people from harm while safeguarding our business's integrity and reputation.

Our commitment encompasses several guiding principles:

- We strive to ensure there is no modern slavery in any part of our business and supply chains.
- We conduct due diligence and supplier screening to ensure our values are upheld and suppliers conform to ethical standards.
- We actively strive to prevent modern slavery within our operations and supply chains by implementing controls to respect and safeguard human rights across all our business activities.
- We establish systems and processes to ensure risks of modern slavery occurring are identified, assessed, and addressed swiftly.
- We provide training to our employees to have the awareness to identify any potential instances of modern slavery in our operations.
- We aim to identify potential risks associated with modern slavery in our business, develop preventive strategies, and implement protective measures.

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## REPORTING ENTITY

Both Strata Community Insurance and ASCG are reporting entities for purposes of the Act. ASCG is the parent entity of a group of related entities, including Strata Community Insurance as its principal operational subsidiary. The group comprises the following registered companies:

- Australian Strata Community Group Pty Ltd (ABN 70 166 256 257)
- Strata Community Insurance Agencies Pty Ltd (ABN 72 165 914 009)
- ASC Employment Services Pty Ltd (ABN 63 003 744 214)
- Strata Community Services Pty Ltd (ABN 93 165 915 793)
- Strata United Insurance Brokers Pty Ltd (ABN 21 165 915 800)
- Strata Shield Insurance Pty Ltd (ABN 68 620 266 097)

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## STRUCTURE, OPERATIONS AND SUPPLY CHAINS

Our operational structure encompasses business teams which include:

- Claims Management
- Community & Strategic Partnerships
- Data & Technology Solutions
- Digital & Transformation
- Finance

- Legal & Governance
- People & Culture
- Technical

## OUR SUPPLY CHAINS

Strata Community Insurance deals with a variety of suppliers who deliver claims-related services to our customers. Strata Community Insurance also deals with many strata managers and insurance brokers, who play a valuable role for those living in or owning strata properties.

Our teams, supported by the Legal & Governance function, also engage with a variety of non-claims-related vendors. This can include in relation to management of office supplies, travel, fleet, building facilities, cleaning, security and maintenance, catering, and consulting professionals.

Our Data & Technology Solutions and Digital & Transformation teams manage a variety of service providers, covering operations, infrastructure and testing, hardware, and software.

We deal with:

- suppliers who deliver claims-related services to our customers.
- strata managers and insurance brokers, who play a valuable role for those living in or owning strata properties.
- non-claims-related vendors and service providers, covering operations, infrastructure and testing, hardware, and software.

The following list reflects the broad variety of service providers forming part of Strata Community Insurance's supply chains.

### Claims Service Suppliers

- Claims Investigators
- Recovery Consultants
- Loss Adjusters
- Repairers, Restorers and Builders

### Consulting and Advisory Providers

- Business Advisory Firms
- Management and Marketing Consultants
- Technology Consultancy Firms

### Insurance and Financial Service Providers

- Insurance Brokers
- Insurance Platform Providers (Underwriting and Claims Platforms)
- Escrow Agents
- Financial Institutions
- Payment Systems Providers
- Actuarial and Insurance Consultancy Firms

### Human Resources and Training Providers

- Recruitment Agencies
- Employee Assistance Program Providers
- Registered Training Organisations
- Universities and Educational Institutions

### Legal and Compliance Providers

- Law and Audit Firms
- Taxation Consultants
- Insurance and Property Industry Bodies
- Compliance and Regulatory Consultants
- Government Departments / Instrumentalities

### Property and Real Estate Related Providers

- Strata Managers
- Landlords/Lessors
- Surveyors, Valuers, and Risk Assessors
- Property Data, Information, and Analytics Service Providers

### Technology and Cybersecurity Providers

- Information Technology Consultants
- Cybersecurity Consultants
- Managed Services Providers
- Software and Hardware Solutions Providers
- Document Management System Providers
- Web Design Consultants
- Telephony and Internet Service Providers

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## RISKS IN OUR OPERATIONS AND SUPPLY CHAINS

Modern slavery represents a potentially complex risk for strata insurance companies, extending beyond direct operations to encompass supply chains and the broader industry ecosystem. Our approach to assessing and understanding potential human rights impacts is based on the *United Nations Guiding Principles on Business and Human Rights (UNGPs)*. We have conducted a preliminary review of the modern slavery risks associated with our operations and supply chains.

Strata Community Insurance faces modern slavery risks in the following areas:

- Construction, maintenance and building material supply chains.
- Property management services.
- Cleaning and maintenance contractors.
- Security service providers.

## SUPPLY CHAIN RISKS

In construction and maintenance, there are potential risks in building material production, construction workforce, renovation and maintenance contractors, and subcontractor management. There is risk of exploitation in supply chains and inadequate labour protections.

## SERVICE PROVIDER RISKS

There are risks in service provider contracted services, such as cleaning services, security personnel, maintenance, and repair teams. There are potential vulnerabilities such as low-wage workers, migrant workers, subcontracted labour, limited employment documentation, and restricted communication.

## PROPERTY MANAGEMENT RISKS

Strata properties can be exposed to potentially hidden modern slavery scenarios, such as domestic worker exploitation, undocumented workforce participation, forced labour in maintenance roles, and vulnerable tenants.

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# DUE DILIGENCE, ACTIONS & REMEDIATION

## POLICY AND GOVERNANCE

At Strata Community Insurance, we believe in strong corporate governance, and are committed to making decisions that are transparent, honest, and ethical. Our commitment to corporate and social responsibility not only protects our business; it ensures we can operate sustainably and support the strata community over time. We strive to maintain high ethical standards in our business practices.

We are committed to protecting human rights and reject any form of modern slavery. We believe that effective remediation and grievance processes are crucial to human rights due diligence, and our rejection of modern slavery is supported by relevant policies such as our Code of Conduct, Whistleblower Policy, and Modern Slavery Policy.

- Our Code of Conduct and our values set out the minimum behavioural standards that we expect of our business and employees.
- Our Modern Slavery Policy applies across the ASCG group of companies. It aims to support all employees, representatives, and contractors to make decisions that align with our approach to modern slavery and how to identify, address and report on risks and incidents.
- Our Whistleblower Policy and Grievance Policy provide mechanisms for external parties and employees to report on concerns regarding improper conduct, including concerns about modern slavery practices.

To report a suspected case of modern slavery, individuals can:

- Immediately raise their concern with an eligible recipient, such as the Managing Director, Chief Executive Officer, Company Secretary, or an Extended Leadership Team member.
- Contact the Legal & Governance Team by email to [compliance@scinsure.com.au](mailto:compliance@scinsure.com.au).
- Directly speak to the General Manager, Legal & Governance.

- Write anonymously to the Company Secretary, Strata Community Insurance, PO Box 631 NORTH SYDNEY NSW 2059.
- Access KPMG's FairCall Service via email: faircall@kpmg.com.au, or phone: 1800 059 798 (AUS) or 0800 000 594 (NZ).
- Write to The FairCall Manager, KPMG Forensic, PO Box H67 Australia Square Sydney NSW 1213.
- Notify law enforcement by calling 000 if there is an immediate threat present.
- Report to the Australian Federal Police by calling 131AFP (131 237) if there is not an immediate threat present.

Any issues reported will be investigated thoroughly, for appropriate action.

## SERVICE PROVIDER SCREENING AND CONTRACTUAL TERMS

We prefer suppliers and service providers that have demonstrated a commitment to sound business practices and have a strong track record through maintaining transparency and high standards of services and supply chains.

We expect all suppliers engaged to comply with applicable laws and regulations in the jurisdiction where relevant goods are sourced and procured, or where relevant services are performed. Our processes focus on:

- Third parties aligning with our stance against modern slavery.
- Key suppliers completing appropriate screening procedures.
- Prioritising suppliers who possess a clear commitment to ethical business practices, consistent high-quality service standards, and open and transparent operations.

Strata Community Insurance is committed to introducing an appropriate set of Modern Slavery clauses in all third-party contracts. New and renewing contracts are being progressively updated to include requirements for third parties to:

- Not participate in modern slavery.
- Take reasonable steps to ensure there is no modern slavery in any part of their business and supply chains.
- Undertake reasonable due diligence for modern slavery risks across their own and subcontractors' activities.
- Establish systems and processes to ensure modern slavery risks are identified, assessed, and addressed.

## REMEDIATION PROCESS

At Strata Community Insurance, we are committed to addressing potential modern slavery risks through a thoughtful and principled approach. Our remediation process allows us to respond to any issues individually and with careful consideration, and may involve:

- Engaging the related supplier to understand the issues.
- Developing corrective action plans with targeted timelines.
- Monitoring implementation and progress of planned actions.
- Reporting of matters to authorities as appropriate.

We remain vigilant and prepared to take immediate and appropriate action should any concerns arise. Our core principles guiding this approach include:

- Treating every potential issue with individual attention and nuance.
- Ensuring fairness in all investigations and potential resolutions.
- Maintaining the highest standard of respect for human rights.
- Continuously improving our preventative measures and response protocols.

We are dedicated to maintaining an ethical and responsible business environment that protects the fundamental dignity of all individuals connected to our operations.

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## ONGOING ASSESSMENT

We are committed to systematically identifying, assessing, and mitigating modern slavery risks, and continuously improving controls across our business operations and supply chains.

### OUR COMMITMENT TO ADDRESSING MODERN SLAVERY

We want to make sure no one in our business or supply chains is being exploited or forced to work against their will. We are dedicated to understanding, preventing, and stopping any potential risks of modern slavery. The first step is knowing where our risks might be.

Our approach is guided by the following principles:

- We carefully consider our supply chains, looking closely at different regions, industries, and suppliers. We seek to identify any areas where workers might be vulnerable to exploitation. We continuously look for potential risks.
  - We create clear rules for our suppliers, requiring them to treat workers fairly and provide safe working conditions. Our supplier contracts will include commitments to combat and avoid modern slavery.
  - We provide training to our own employees to help them recognise and prevent modern slavery. This helps us to identify warning signs early and act quickly. Our goal is to create a proactive system that prevents potential exploitation before it occurs.
  - We provide mechanisms where anyone can report concerns anonymously and can speak up without fear of retribution.
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## RELATED ENTITIES CONSULTATION

Strata Community Insurance has prepared this Statement on behalf of ASCG and its subsidiaries, in consultation with our subject matter experts from across the business. This has included consultation with our Claims Management, Technical, Community & Strategic Partnerships, Data & Technology Solutions, Digital & Transformation, Finance, Legal & Governance, and People & Culture teams. Discussions have also been held with directors and senior managers at the board and management level.

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## OTHER INFORMATION

### EDUCATION & AWARENESS

At Strata Community Insurance, we recognise our critical role in the strata insurance industry as an organisation committed to ethical conduct and human rights. We strive to maintain the highest standards of professional integrity, and this is explicitly articulated in our Modern Slavery Policy. We understand that our commitment extends beyond mere compliance and is about creating a culture of awareness and proactive responsibility.

We have developed and distributed our Modern Slavery Policy to all staff members and are progressively implementing modern slavery awareness training intended to assist our team members understand modern slavery, recognise potential risks, and comprehend how to report any suspicious circumstances.

### CONTINUOUS IMPROVEMENT

We are committed to continuously improving our approach and strengthening our controls. Our leadership team is fully involved and is committed. Ultimately, our goal is to ensure that every person involved in our business and supply chains is treated with dignity, respect, and fairness. We are committed to being part of the solution to modern slavery, working actively to create positive change.

We are actively working to prevent modern slavery by:

- Continuously improving our policies to address modern slavery risks.
- Integrating modern slavery considerations into our commercial arrangements.
- Strengthening our supplier selection process to identify potential modern slavery risks.
- Conducting comprehensive due diligence of our supply chains.
- Implementing rigorous partner and supplier screening procedures.
- Conducting annual attestations with specific modern slavery review questions.
- Developing methods to assess the effectiveness of our anti-slavery initiatives.
- Continuously improving staff understanding of modern slavery risks.
- Providing regular ongoing training to employees to increase awareness.

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## APPROVAL

This Statement has been approved by the Boards of Strata Community Insurance Agencies Pty Ltd and Australian Strata Community Group Pty Ltd, and has been signed by Paul Keating, Managing Director.

Signature



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Date

29/11/2025

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