



Modern Slavery Statement 2020



At Ansvar, it is not only our mission to be the most trusted and ethical specialist insurer within our core sectors but, importantly, to also make a significant contribution to help build safer communities that promote well-being and peace of mind. In doing so, we pride ourselves in achieving high professional standards in everything we do and in the way we treat and interact with others, including our stakeholders, partners, suppliers and clients. We are passionate about protecting the communities we serve, particularly those most vulnerable.

We and our owner, the Ecclesiastical Insurance Group, take the issues of modern slavery very seriously and are committed to helping eradicate modern slavery wherever it appears. Not only is this essential to protect human rights, we genuinely believe it is the right thing to do.

This Modern Slavery Statement was endorsed by the Board of Directors of Ansvar Insurance Limited on 21 May 2021.

A handwritten signature in black ink, appearing to be 'WH', written in a cursive style.

WARREN HUTCHEON
ANSVAR CEO

About this Statement

Ansvar Insurance Limited is incorporated in Australia (ACN 007 216 506) and specialises in providing general insurance and risk management services across the Care, Community, Faith, Education and small business sectors.

This statement is made in accordance with the obligations of reporting entities under Australia's Modern Slavery Act 2018 (Cth). It constitutes our Modern Slavery Statement for the financial year commencing 1 January 2020 and ending 31 December 2020.

Ansvar and its owner, the Ecclesiastical Insurance Group plc in the United Kingdom, are committed to embedding ethics and accountability in all aspects of our business operations. This includes taking seriously our responsibility to help eradicate modern slavery in all its forms.

Our head office is located at
Level 5, 1 Southbank Boulevard,
Southbank Victoria 3006

We employ approximately 100 staff across
our offices in Melbourne, Sydney, Brisbane,
Adelaide, Perth and Canberra

100% of our operations are in Australia

We don't sell insurance or risk
management services to customers
outside of Australia

About Ansvar

Ownership

Ansvar Insurance (Ansvar) was launched in Australia in 1961 and became a wholly owned subsidiary of the Ecclesiastical Insurance Group (Ecclesiastical) in 1998. Established in the United Kingdom in 1887, Ecclesiastical is renowned as a specialist insurer and financial services provider, having won many awards for its commitment to ethical insurance and investment services.

Ecclesiastical is owned by the Allchurches Trust, which distributes all available profits for the benefit of communities in need.

Structure & Operations

Ansvar holds an Australian Financial Services Licence (AFSL) to deal in general insurance products to retail and wholesale clients. We do not manufacture goods, deal in funds management or outsource core functions such as customer service, claims management or financial accounting.




Ansvar only operates in Australia and does not have any Authorised Representatives or subsidiary companies trading.

Our business model centres on selling general insurance products through customers' appointed insurance brokers and supporting our core customer markets with tailored risk management solutions. We also distribute a small number of domestic insurance products for other insurers.

Our workforce is comprised of approximately 100 people, all employed in Australia. Occasionally we engage people to work with us on a short-term contract basis, but do not use customer call centres or labour hire services.

Our Supply Chains

Our business model relies on relatively short and direct supply chains. While Ansva does not routinely procure services directly from overseas suppliers, we recognize that the following supply chains still encompass a degree of risk.

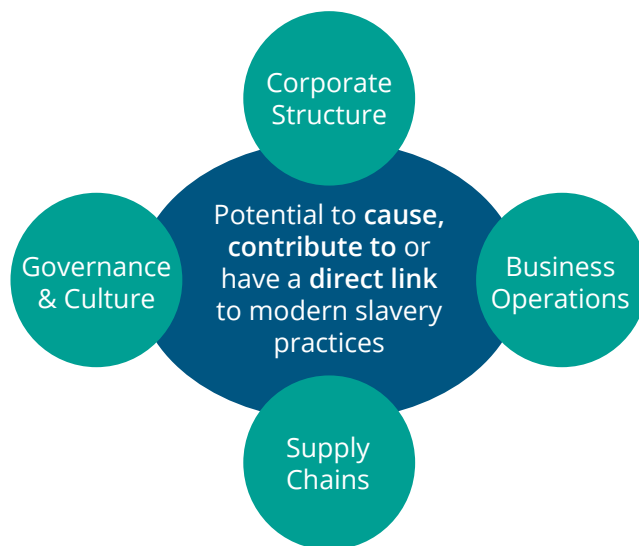
 Product distribution	 Insurance services providers	 Risk management services
<p>Our insurance products are primarily distributed through customers' appointed insurance brokers.</p> <p>We do not outsource the sale or management of our insurance products.</p>	<p>We engage the following services across Australia:</p> <ul style="list-style-type: none"> • Loss assessors • Loss adjusters • Investigators • Repairers • Suppliers of insurable goods • Recovery agents 	<p>Our risk management specialists partner with other suppliers from time to time:</p> <ul style="list-style-type: none"> • Development of online risk management tools and resources • Engineers and specialist risk assessors • Peak bodies in the Care sector
 Technology	 Investment portfolio	 Workforce
<p>We engage providers of:</p> <ul style="list-style-type: none"> • Hardware and technology platforms • Software and software services • Information security • Data processing and storage • E-waste disposal • Telecommunications 	<p>We invest in funds that meet our responsible and sustainable investments criteria.</p>	<p>We engage recruitment agencies from time to time, but do not require labour hire services.</p>
 Brand & marketing	 Office products & services	
<p>We procure printing and merchandising products and services from local suppliers.</p>	<p>We rely on local suppliers of :</p> <ul style="list-style-type: none"> • Office furniture • Office supplies and stationary • Cleaning and security services 	

Risks of modern slavery practices

Modern slavery amounts to serious human rights violations and poses a ‘people risk’ for all organisations, including Ansvar.

Our process for managing modern slavery risk centres on defining and evaluating the symbiotic relationship between our:

- Corporate structure;
- Business operations and environment;
- Supply chains as a general insurer;
- Governance practices and culture; and
- Understanding of how organisations may knowingly or unwittingly engage in modern slavery practices.



When identifying our risk exposures, we focus on the potential to:

- **cause** modern slavery practices as a direct result of our operations; or
- **contribute to** modern slavery by facilitating or incentivizing serious human rights violations; or
- be **directly linked** to modern slavery through other entities we have business relationships with.

Category	Commentary
We may purchase products or services from suppliers who unwittingly contribute to modern slavery practices.	Global supply chains are increasingly complex, with reducing visibility as we move further down the supply chain. Understanding the ‘suppliers to our suppliers’ poses the greatest challenge to managing this risk effectively.
We may invest funds in companies or industries that drive profits through servitude, forced labour or debt bondage.	We must ensure our Fund Managers remain well trained on our responsible and sustainable investments criteria. Most importantly, we must continue to closely monitor and audit compliance against all facets of our Investment Policy.
We may outsource business activities to another service provider who has exposure to modern slavery practices in their supply chains.	Outsourcing business activities creates heightened risk where a supplier has a complex ownership structure and operates across multiple jurisdictions. Thorough due diligence, contractual arrangements and periodic audits of the supplier’s compliance with contract terms are fundamental to managing this risk.
An entity in our corporate structure may expand its operations into an industry, product suite or geographic location that engages in modern slavery practices.	This risk could eventuate if governance over business development and acquisitions is inadequate. However Ansvar’s corporate structure is relatively simple, with a single owner and well established boundaries for investing in new opportunities.

Actions taken to assess and address modern slavery risks

Ansvar has adopted a staged approach to addressing modern slavery risks. During this reporting period, we have prioritised the following actions.

Working with our suppliers to better understand our supply chains

Reviewing our corporate policy framework

Evaluating and strengthening our responsible and sustainable investments policy

Better understanding our supply chains

Work has centred on further understanding the supply chains of our key suppliers. This generally occurs as part of our due diligence when selecting, or renewing contracts with suppliers. Our criteria includes consideration of a supplier's:

- Ownership structure
- Suite of products and services
- Geographical locations
- Disclosure of the scope and depth of their supply chains.

The awareness of modern slavery risks amongst senior staff who are involved in procurement has also been enhanced during this reporting period.

Corporate policy framework

Effectively managing the risk of Ansvar unwittingly supporting modern slavery practices is largely dependent on us embedding risk controls in relevant corporate policies and procedures.

- Our Outsourcing Policy requires suppliers of material business activities to provide us with a declaration outlining the steps they have taken to ensure modern slavery practices are not taking place in their business or supply chains.
- Our Corporate Responsibility and Customer Centric Policies underpin our Board of Director's expectations of how Ansvar will pursue its business goals as an ethical insurer.
- Our Whistleblower Policy and Risk Management Policy encourage staff to speak up about any unconscionable conduct or unethical business practices.

We continue to work closely with Ecclesiastical to share knowledge and insights of their work in accordance with the UK Modern Slavery Act 2015.

Responsible and sustainable investments

Our Board's Investment Policy details strict parameters for ensuring our investment portfolio is comprised of responsible and sustainable investments. This approach is in keeping with Ecclesiastical's well recognised commitment to responsible investments.

Assessing the effectiveness of actions taken

Assessing the effectiveness of our approach to addressing modern slavery risks is an iterative process comprised of the following:

- We continue to develop measures for better understanding and monitoring the depth of our suppliers' operations and supply chains.
- We continue to work closely with our colleagues at Ecclesiastical to evaluate our understanding of the most effective strategies for ensuring we uphold our responsibility to help eradicate modern slavery practices.
- We are committed to enhancing our staff's understanding of what constitutes modern slavery and the importance of remaining alert to exposures in our supply chains.

The COVID-19 global pandemic is undoubtedly exacerbating modern slavery risk in some countries. Ansvar will continue to monitor this exposure when selecting and negotiating terms with suppliers.

Consultation with related entities

Ansvar does not own or control any subsidiary companies that are currently trading. However we continue to work closely with Ecclesiastical to uphold the Group wide commitment to minimising modern slavery risks.



To see more, go online
ansvar.com.au

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