

# Cover-More Group Modern Slavery Statement

## Introduction

In accordance with the Modern Slavery Act 2018 (Cth), this statement outlines the commitment and steps Cover-More Group Ltd (“CMG”) has taken in 2021 to identify modern slavery risks and communicate the progress to assess, monitor, manage and reduce the risks within the business operations and in relation to CMG’s supply chain.

Modern slavery is an offence under the Act and violates fundamental human rights via situations of exploitation. The Australian Government defines modern slavery as encompassing “slavery and slavery-like practices, including servitude; child labour; forced or bonded labour; human trafficking; forced marriage, and deceptive recruiting for labour or services”.

## Structure of business and reporting entity

CMG consolidate at Zurich Travel Solutions Ltd (“ZTS”), which is an immediate shareholder and incorporated in Australia.

CMG is the reporting entity for its subsidiary entities that conduct the following business activities:

- distribution of insurance services, primarily travel insurance, in numerous jurisdictions globally, additionally, CMG manages although does not own, entities in Latin America and Canada
- global travel assistance business providing access to emergency medical, security and travel assistance services for individual and corporate travellers
- Employee Assistance Program provision operating in Australia and New Zealand providing mental health and wellbeing services delivered directly to employees of customer organisations

The provision of these services relies on products and services sourced from third parties, in particular IT related services, various professional services (consulting, data; marketing etc), and facilities management. CMG also relies on third-party distributors as well as a global network of health care providers.

## Risk assessment and consultation of subsidiaries

CMG conducts an annual modern slavery risk assessment, analysing the CMG’s and its related entities’ exposures to modern slavery risks based on the sectoral composition of its immediate suppliers and the geographic location of its business activities.

CMG has consulted each of its business units to identify and describe supply chains and validate the risk assessment.

On balance, for 2021, the risk of modern slavery in the operations and supply chains of CMG has been assessed as low.

Risk may increase when contracting certain services across the following parts of CMG’s global value chain:

- facilities management
- promotional goods
- food and beverage for corporate purposes
- subsidiary services provided to IT equipment manufacturers and
- subsidiary services provided to health care and medical assistance providers.

Scarcity of specialised services, particularly in at-risk geographic locations, may leave CMG with few provider options to provide emergency medical assistance. As a result, CMG may, on occasion, be required to deal with a service provider in a country where modern slavery protections range from minimal to absent in order to manage and protect the well-being and health of an impacted traveller. Exposure via assistance providers is driven by customer choice in terms of destination and accommodation venues.

## Actions to mitigate modern slavery risk

CMG has developed a global Code of Conduct policy documenting the standards of ethical behaviours it expects of its employees. The Code of Conduct reflects a commitment to the protections of international human rights as exemplified in the United Nations Global Compact.

In addition, all CMG entities have in place a whistleblowing policy providing guidance and the forum to speak up and report human rights violations and any form of modern slavery.

These policies apply to all employees of CMG and its subsidiaries and affiliates worldwide to ensure the risk of transactions that contravene human rights and any form of forced labour or modern slavery are reported and mitigated.

All employees are required to complete mandatory Code of Conduct training and assessment upon induction, and annually thereafter, to demonstrate understanding and commitment to ethical behaviour, including the reduction of modern slavery risks.

A review of policies in relation to third party management is planned for 2022.

## Final provisions

This document has been approved by the Board of Directors of Zurich Travel Solutions (ABN 47 616 863 604) on 30<sup>th</sup> March 2022 as the governing body of each entity covered by this statement.

Dated: 3/05/2022

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*Damien Woods*  
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Signed by Damien Woods  
Director  
for and on behalf of  
**Benestar Group Pty Ltd**

*Will Ashcroft*  
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Signed by Will Ashcroft  
Director  
For and on behalf of  
**Cover-More Insurance Services Pty Ltd**

**Travel Insurance Partners Pty Ltd**

Dated: 3/05/2022

Dated: 3/05/2022

*Adrian Leach*  
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Signed by Adrian Leach  
Director  
for and on behalf of  
**World travel Protection Pty Ltd**

*Todd Nelson*  
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Signed by Todd Nelson  
Director  
For and on behalf of  
**Cover-More Insurance Services Pty Ltd**

**Travel Insurance Partners Pty Ltd**