

ClearView Modern Slavery Statement

10 December 2025

About this statement

Our Modern Slavery Statement (Statement) is published in accordance with the Modern Slavery Act 2018 (Act)

This Statement is made pursuant to section 14 of the **Act** for the reporting period from 1 July 2024 to 30 June 2025 (the Reporting Period).

This is a joint statement for the following entities:

- **ClearView Wealth Limited** (ABN 83 106 248 248) is a publicly listed company deriving income from the provision of life insurance products. ClearView Wealth Limited is the ultimate parent of the below companies:
 - ClearView Life Assurance Limited (ABN 12 000 021 581); and
 - ClearView Administration Services Pty Limited (ABN 90 135 601 875).
- **ClearView Life Assurance Limited** (ABN 12 000 021 581) offers life insurance products. This entity is also a subsidiary of ClearView Wealth Limited and meets the reporting requirements of the Act.

The registered address of each of the entities is Level 15, 20 Bond Street Sydney New South Wales 2000. For the purpose of this Statement, ClearView refers to both reporting entities and subsidiaries listed here.

During the reporting period, ClearView completed its exit from its wealth management business. ClearView's Statement is publicly available on its website at clearview.com.au/governance, and has been shared internally with its employees via the ClearView intranet. In addition, the Statement has been lodged on the Australian Government's Modern Slavery Statements Register.

Modern Slavery Act mandatory reporting criteria

Criterion	Page reference
Identify the reporting entity.	Page 2
Describe the reporting entity's structure, operations and supply chains.	Pages 3 and 4
Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity, and any entities that the reporting entity owns or controls.	Page 5
Describe the actions taken by the reporting entity and any entity that the reporting entity owns or controls, to assess and address those risks, including due diligence and remediation processes.	Page 6
Describe how the reporting entity assesses the effectiveness of these actions.	Page 7
Describe the process of consultation with any entities that the reporting entity owns or controls.	Page 7
Other relevant information.	Page 8

Our structure, operations and supply chains

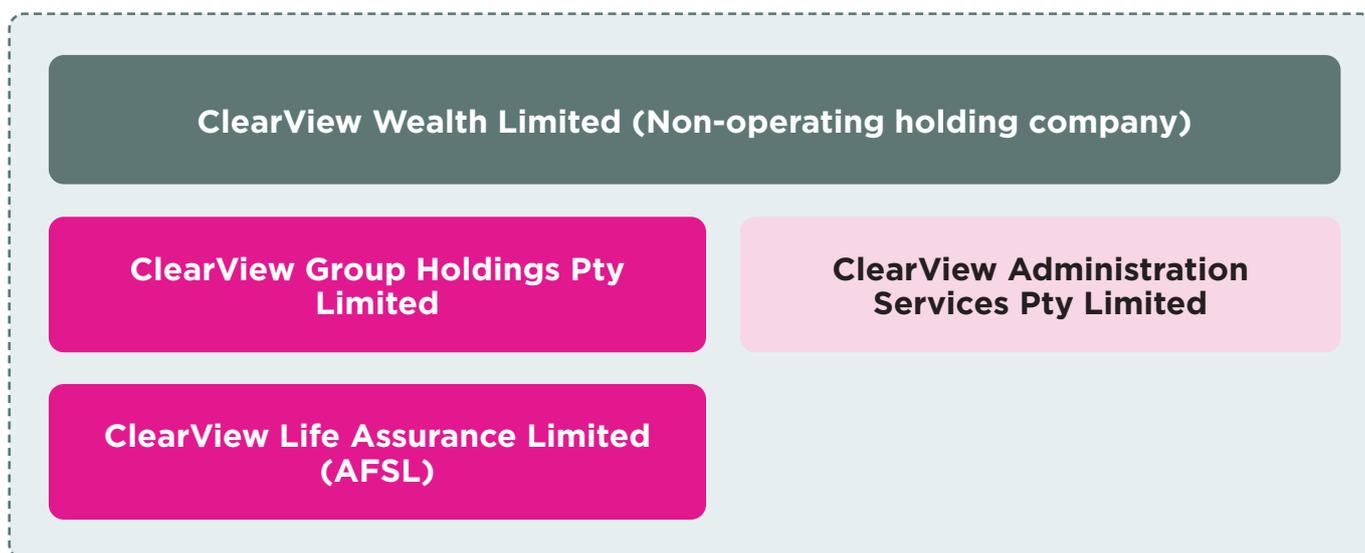
About ClearView

ClearView refers to the ClearView Group, of which ClearView Wealth Limited is the publicly listed non-operating holding company (**NOHC**). CWL is regulated by the Australian Prudential Regulation Authority (**APRA**) and is the ultimate parent entity of the life insurer, ClearView Life Assurance Limited (**ClearView Life**). ClearView Life is authorised by APRA and holds an Australian Financial Services Licence (**AFSL**), licence No. 227682, both of which permit the issue of life insurance products.

ClearView Group Holdings Pty Limited is the non-operating parent entity of ClearView Life.

ClearView Administration Services Pty Limited (**CAS**) centralises the administrative responsibilities of the ClearView Group. CAS employs all ClearView staff and enters into contracts with suppliers and service providers on behalf of the ClearView Group, supporting the delivery of life insurance products and related services.

ClearView's group structure is set out in the diagram below.



ClearView operates within Australia and employs around 300 people. ClearView's head office is located in Sydney with satellite offices in Melbourne, Brisbane and Perth.

Distribution of workforce by location as at 30 June 2025	No. of employees
NSW	286
QLD	15
VIC	10
WA	4
SA	2
TAS	1

ClearView was created in its current form in 2010 (the origins of the company date back to 1976) with the objective of building a challenger brand in the life insurance market.

ClearView has more recently strategically simplified its business, exiting its financial advice business in November 2021 and completing its exit from wealth management in early March 2025. ClearView is now solely focused on its core life insurance business and generates its revenue by issuing, administering and distributing life insurance products.

Further details about ClearView and its business can be found on the ClearView website at clearview.com.au/about.

Life Insurance

ClearView's flagship product suite, branded 'ClearChoice', was launched in October 2021 to be a high-quality advice-based product suite, incorporating the sustainability and product design requirements that were implemented across the industry. ClearChoice products include Life Cover, Total and Permanent Disability, Trauma, Child Cover, Income Protection and Business Expense Cover.

ClearView's previous product suite that was distributed by financial advisers, branded 'LifeSolutions', was launched in December 2011. This product suite was closed to new business when the ClearChoice product was launched.

ClearView also maintains an in-force portfolio of non-advised life protection products that were previously distributed through direct marketing and related channels. These products include Term Life, Accidental Death, Injury Cover, Trauma and Critical Illness, and Funeral Insurance. These products are no longer marketed to customers. For further information about our insurance offering, visit our website at clearview.com.au/insurance.

Wealth Management

During the reporting period, ClearView completed its exit from its wealth management business. This followed the sale of its funds management business and the retirement of the superannuation trustee in previous years.

ClearView Administration Services

ClearView engages a variety of Service Providers under both short-term procurement contracts and long-term outsourcing agreements.

ClearView's supply chain is broad yet typical of the financial services industry, with potential exposure to modern slavery risks primarily arising from its relationships with suppliers both locally and overseas.

Outsourcing and procurement of most of ClearView's third party service agreements are conducted through CAS and includes the procurement of products and services across the following key categories:

- Human resources relating to background checks, recruitment, and reference checking
- Office supplies
- Marketing and communications
- Professional services including audit, consulting, legal and medical services
- Property services including cleaning, facilities management and utilities
- Travel and expenses
- Information technology software and support services and management

Modern slavery risks in our operations and supply chains

Operations

ClearView operates solely within Australia and within the highly regulated financial services sector, employing a professional, skilled workforce. As a result, we assess the risk of modern slavery in our own operations as low. Nonetheless, we continue to monitor our operations for any emerging vulnerabilities.

Key factors contributing to our low risk profile include:

- **Employment standards:** ClearView maintains employment policies and practices that meet or exceed the requirements of the *Fair Work Act 2009 (Cth)*.
- **Australian-based workforce:** All employees are engaged within Australia under formal contracts that provide for fair wages and working conditions.
- **Reporting and grievance mechanisms:** Employees are encouraged to raise any concerns through management channels or under ClearView's **Whistleblower policy**.

Supply chain risks

ClearView's supply chain includes a range of service providers and suppliers both in Australia and overseas, primarily through outsourcing and procurement activities managed by CAS. ClearView's supply chain has remained relatively consistent during the 2025 reporting period. The majority of our suppliers are Australian-based entities. However, some suppliers may use offshore operations, sub-contractors, workforce arrangements or data storage locations in various jurisdictions, including India, Hong Kong, Philippines, Vietnam and South Korea.

Based on insights from the **Global Slavery Index** and emerging trends in the financial services sector, we have identified the following supplier categories as comparatively higher risk for potential modern slavery practices:

- **Information and communication technology (ICT) hardware:** The manufacture of computers, mobile devices, and related components involves complex global supply chains and the use of raw materials that can originate from higher-risk regions.
- **Cleaning and facilities management services:** These services may involve subcontracting arrangements and reliance on migrant or casual labour, which can increase risks related to underpayment, excessive working hours, or denial of entitlements.

ClearView recognises that, while we have limited direct control over these supply chains, we may be linked to modern slavery risks through the products and services we procure. We continue to work with our suppliers to strengthen due diligence and promote responsible labour practices.

How we assess and address modern slavery risks

Our approach to risk assessment

Policies and standards

ClearView has a number of policies in place to assess and address risks relating to modern slavery, which are reviewed and updated regularly, including:

- **Anti-bribery and corruption policy:** sets out how ClearView complies with all applicable Australian anti-bribery and anti-corruption laws and regulations, and our commitment to standards of integrity and operating fairly and honestly.
- **Code of conduct:** sets expectations for how our employees, contractors, directors, suppliers and other representatives should act and how we made decisions at ClearView. It shapes how we deliver to our customers, how we work with our partners and stakeholders and how we impact the community we live in. This includes how ClearView manages risks of modern slavery in how it operates and deals with its supply chain.
- **Conflicts management and related party transactions policy:** provides a framework for how we identify, assess and mitigate conflicts of interest, and for managing related party transactions within the ClearView Group.
- **Gift and hospitality policy:** sets out ClearView's commitment to ensuring that Employees and Directors understand ClearView's Policy in relation to giving and receiving benefits (including gifts) and acts of hospitality.
- **Whistleblower policy:** provides guidance as to what can be reported under the policy, how to report concerns and how eligible whistleblowers will be protected if a report is made.
- **Work health and safety policy:** outlines our commitment to ensuring a safe workplace and culture.

Modern slavery training

At least once per year, all eligible ClearView staff are required to complete a modern slavery awareness compliance module.

Risk governance

- The Board and management remain committed to continuously improving the Group's Risk Management Framework to ensure robust risk management practices are in place across ClearView supported by a strong risk culture.
- Whilst these initiatives are not intended to directly

address modern slavery risks, they do strengthen ClearView's overarching risk and compliance functions that work with the business to identify and manage all of its financial and non-financial risks.

Modern slavery risk management in our supply chain

- ClearView's ongoing review of its material service provider relationships is an important part of its modern slavery response.
- When onboarding new material service providers, and as part of ongoing monitoring and review, we ask whether they comply with the Modern Slavery Act and request they provide relevant supporting documents, including attestations, reporting or frameworks regarding Modern Slavery.
- As part of ClearView's contract review process, ClearView will take reasonable steps to negotiate anti-modern slavery provisions into all new material or key contractual agreements and any arrangements that may pose a high risk of modern slavery practices.
- As existing service provider contracts are renegotiated or actively renewed, we will continue to take reasonable steps to include anti-modern slavery provisions into those arrangements.

Reporting mechanisms

ClearView maintains several channels through which concerns about potential modern slavery risks or other unethical conduct can be raised.

Employees, contractors, and other stakeholders are encouraged to report any concerns through:

- **People managers:** Employees are encouraged to raise issues directly with their manager, People and Culture, or senior leadership, where appropriate.
- **Whistleblower policy:** Our Whistleblower policy provides a secure and confidential mechanism for individuals to report misconduct, including potential breaches of human rights or modern slavery laws. Reports can be made anonymously and are investigated in accordance with our established procedures.
- **Risk and compliance function:** Modern slavery-related concerns identified through service provider due diligence or ongoing monitoring can be escalated to the Group Risk and Compliance team for assessment and action.

Assessing effectiveness

Based on our investigations during the reporting period, ClearView continues to assess the risk of directly causing or contributing to modern slavery within its own operations as low, reflecting our position as a life insurance company operating entirely within Australia.

To evaluate effectiveness, we consider:

- The extent to which modern slavery risk has been considered for new and existing service providers;
- The quality and completeness of supplier attestations and supporting documentation received;
- Outcomes from our ongoing review of Material Service Provider relationships; and
- Any issues or incidents identified through internal reporting, including our Whistleblower and Risk and Compliance processes.

We acknowledge that assessing effectiveness is an ongoing process, and we are committed to continuous improvement. We continue to evaluate our service provider management process to ensure our contractual arrangements and governance processes address modern slavery risk that can arise in supply chains.

Our consultation process

In preparing this Statement, ClearView consulted with representatives from across its business, including Vendor Management, People and Culture, Group Risk and Compliance, and the Executive Leadership team, to confirm actions that have been taken and to establish key areas of future focus for improvements in identifying and managing risks of modern slavery in its operations and supply chain.

Statement approval

This Statement was approved by the Boards of each of the two reporting entities covered by this Statement on 10 December 2025.

This Statement is signed by Geoff Black in his role as Chairman of the ClearView Wealth Limited and ClearView Life Assurance Limited Boards and Nadine Gooderick in her role as Managing Director on 10 December 2025.



A handwritten signature in black ink, appearing to read 'Gooderick'.

Nadine Gooderick

Managing Director
ClearView Wealth Limited and
ClearView Life Assurance Limited



A handwritten signature in black ink, appearing to read 'Geoff Black'.

Geoff Black

Chairman
ClearView Wealth Limited and
ClearView Life Assurance Limited



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