



ALLIANZ PARTNERS MODERN SLAVERY STATEMENT 2021

Reporting period January - December 2020

INTRODUCTION



This is the first Modern Slavery Statement for Allianz Partners, as part of our obligations under the Modern Slavery Act 2018 (Act).

This statement has been prepared to highlight the actions taken to identify and assess the Modern Slavery risks in our operations and supply chains.

Modern Slavery is a crime and violation of fundamental human rights, the conduct of which would constitute a criminal offence under Australian law or international law including trafficking in persons and the worst forms of child labour. Additionally it can be in the form of coercion, threats or deception used to exploit victims and undermine freedoms.

Allianz Partners is committed to ensuring transparency in our business and our approach to addressing modern slavery in every form throughout our operations and supply chains. Allianz Partners is committed to the following standards and expects the same from our service providers, suppliers, sub-contractors and other business partners.

Allianz Partners is committed to:

- Acting ethically, honestly and with integrity in all our business dealings and relationships;
- Developing and implementing effective controls, processes, procedures and system enhancements to identify and minimise modern slavery and human rights abuses in Allianz Partners operations and supply chains; and
- Monitoring service providers and suppliers by conducting assessments and reviews as required, ensuring transparency and adherence to relevant policies and procedures at Allianz Partners, including the Procurement Policy, Anti-corruption Policy, Whistleblowing Policy, Supplier Code of Conduct, Employee Code of Conduct, Outsourcing Policy and Procedures for Compliance Breach and Incident Handling.

This statement reflects Allianz Partners' progress during calendar year 2020 to understand and to address modern slavery risks across our business operations and supply chains.

The Allianz Partners Australia Board of Directors approved this statement on 24 June 2021.

Signed by:

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

Nigel Alexander
CHAIR, AWP AUSTRALIA PTY LTD
24 JUNE 2021



01. IDENTIFY THE REPORTING ENTITY

This statement is made by AWP Australia Pty Ltd ABN 52 097 227 177 trading as Allianz Partners.

Our registered office address is Level 16, 310 Ann Street, Brisbane QLD 4000.

02. STRUCTURE, OPERATIONS AND SUPPLY CHAINS

AWP Australia Pty Ltd is:

- registered with ASIC as an Australian proprietary company limited by shares;
- the holder of an AFS licence which authorises AWP to carry on a financial services business to provide general financial product advice for general insurance products and deal in financial products by issuing, applying for, acquiring, varying or disposing of financial products in respect of general insurance products and applying for, acquiring, varying or disposing of a financial product on behalf of another person in respect of the general insurance products to retail and wholesale clients;
- the holder of an ABN and registered for GST with the ATO;
- a subsidiary of Allianz Partners SAS, located in Paris, France; and
- a member of the Allianz Group of companies and subject to Allianz Group compliance frameworks and policies to support Allianz Group licences and authorisations. Our ultimate holding company is Allianz SE, located in Munich, Germany.

Allianz Partners has over 600 staff in Australia working both remote and onsite at our Ann Street premises.

As one of the world's leading B2B2C specialists, Allianz Partners provides continuous, innovative protection and care to our business partners, customers and employees worldwide. We specialise in international health insurance and after-hours assistance for overseas students and visitors, health and lifecare services, travel insurance, medical assistance and repatriation services and roadside assistance and emergency home assistance services.

Allianz Partners has a presence in 35 countries, a highly connected network and the experience and understanding to offer tailored support to our business partners and customers when needed most.

CORPORATE FUNCTIONS

Key Operations:

These key operations support the corporate functions of Allianz Partners:

Claims Handling

Supply Chains

NB. goods and service providers detailed below are located within Australia, unless specified

- Assessment tools – software
- Claims handling for overseas student health cover provided in Australia (in-house)
- Claims handling for overseas visitor health cover provided in Australia by our underwriter and registered private health insurer Peoplecare Health Limited
- Claims handling for travel insurance claims provided in Australia (in-house)
- Claims handling for minor travel insurance claims provided offshore by AWP Services (Thailand) Co. Ltd. which is a member of the Allianz Group of companies
- Data management
- Secure document management

Customer services

- Call centre located in Australia (in-house)
- Call centres - International (outsourced to Allianz Services Private Limited in India and AWP Services Thailand)

Facilities

- Building facilities management
- Cleaning
- Leased properties in Australia
- Maintenance services
- Post and courier
- Products and stationery (coffee & office suppliers)

Finance

- Onsite support services
- Offshore operational support (Allianz Partners India)
- Banking and finance partners

Information technology

- Operational support
- Infrastructure Technology (owned by AWP Australia and offshore by Allianz SE)
- Hardware
- Software
- IT Consultants

Key Operations:

These key operations support the corporate functions of Allianz Partners:

Market management

- Media channels (all forms)
- Marketing support services
- Print and promotional merchandise
- Public relations
- Sponsored & Internal events
- Websites – hosted and white label

People & Culture

- Employee assistance
- Labour Hire
- Learning and development
- Recruitment services
- Training materials
- Workplace health & safety

Project Management

- Project consultants
- Systems and processes

Procurement

- Consulting services
- Outsourced services
- Rental fleet management
- Travel

Risk and compliance, internal audit

- Insurance
- Systems and tools
- Training

Networks

- Home assistance maintenance & service providers
- Home assistance product support
- Medical and allied health services
- Medical providers International (Allianz Group business units)
- Personal assistance services
- Roadside assistance & battery supply
- Vehicle tow services

Supply Chains

NB. goods and service providers detailed below are located within Australia, unless specified

General insurance products and assistance services

Allianz Partners is responsible for developing insurance and service products, determining target markets and economic models for distribution and customer value in accordance with the terms of our underwriting agreement with Allianz Australia Insurance Limited. Allianz Partners transacts with our clients (individuals and companies) to provide assistance and support with:

- Home and life assistance services, supporting Allianz Australia Insurance Limited, Department of Veterans' Affairs and other clients
- Medical assistance and access to network providers
- Private health insurance for overseas student health cover (OSHC)
- Private health insurance for overseas visitor health cover (OVHC)
- Roadside assistance through network providers including on spot repair, battery replacement and tow recovery services
- Roadside assistance mobility service providers including rental vehicle hire and taxi
- Travel Insurance for banking clients, travel agents and direct to public through Allianz Australia

Allianz Partners distributes these products both on its own account and through appointed agents and authorised representatives in relation to travel insurance, OSHC and OVHC insurance.

Other Services

Allianz Partners also provides claims handling services to other insurers, as follows:

- Third party claims administration and medical repatriation services for related parties (i.e. other Allianz business units located offshore);
- Third party client relationship management and telephony services for other insurers;
- Small claim home repairs for Allianz Australia.

Key Operations:

These key operations support the distribution of Allianz Partners products and services and processing of any associated claims.

Sales

Supply Chains

NB. goods and service providers detailed below are located in Australia, unless specified.

- Call centres operated by Allianz Partners locally and through our offshore providers in Allianz Services India and AWP Services Thailand.
- In store (agent operated)
- Online via public websites
- OSHC direct by Allianz Partners on-campus staff
- Directly with corporate clients

Business partners (External)

- Agencies and Brokers for Travel Insurance
- Financial institution partners
- Vehicle OEM partners
- Government – Department of Veterans' Affairs
- Education provider partners
- Utility partners

03. DESCRIBE THE RISKS OF MODERN SLAVERY WITHIN THE BUSINESS OPERATIONS AND SUPPLY CHAINS

a. Definitions, Scope and Methodology: Allianz Partners' Approach to Identifying Risk

The following considerations from the "Commonwealth Modern Slavery Act 2018 Guidance for Reporting Entities"¹ have been used when reviewing Allianz Partners modern slavery risks:

Risks of Modern Slavery Practices	The risks of modern slavery practices means the potential for the entity to cause, contribute to, or be directly linked to modern slavery through its operation and supply chains.
Sector and Industry Risks	Certain sectors and industries may have high modern slavery risks because of their characteristics, products and processes. For example, extractives, textiles and fashion, fishing, electronics, cleaning, and agriculture are recognised as high-risk industries globally.
Product and Services Risks	Certain products and services may have high modern slavery risks because of the way they are produced, provided or used. For example, bricks, cobalt, cotton and rubber are recognised as high-risk products globally. Similarly, services such as cleaning that often involve lower wages and manual labour may have high modern slavery risks.
Geographic Risks	Some countries may have higher risks of modern slavery, including due to poor governance, weak rule of law, conflict, migration flows and socio economic factors like poverty.
Entity Risks	Some entities may have particular modern slavery risks because they have poor governance structures, a record of treating workers poorly or a track record of human rights violations.

Allianz Partners approached our modern slavery risk assessments following a detailed review of our key sourcing figures. The key sourcing figures cover engaged providers through Allianz Partners. The modern slavery risk review categorised all providers used by the business into their respective category and sub-category. The key providers from each sub-category were selected based on their volume of business as a percentage of total business within the category. Providers who were deemed to have either an inherent or a perceived risk were also captured within the risk assessment.

The selected categories and key suppliers were screened and measured based on whether the supplier:

- understands or has a program for reducing modern slavery;
- acknowledges the United Nations guiding principles on business and human rights;
- uses overseas suppliers;
- uses raw materials or imported materials;
- has in place labour standards or a labour policy;
- has the ability to meet relevant standards;
- has an employee retention and remuneration process; and
- has training or awareness in respect to modern slavery.

These reviews investigated key products, services, sectors, industries, geographies and suppliers across the organisation. This resulted in the identification of high and medium risk categories.

Allianz Partners' Methodology

As a member of the Allianz Group, Allianz Partners seeks to address and remediate areas of concern and seek ways to create change. This includes improving policies and due diligence processes, supplier engagement and/or strengthening grievance mechanisms. Our methodology for identifying the risks of modern slavery practices is summarised below:

SETTING THE DIRECTION

Working Group established:

- Procurement
- Networks
- Legal
- Compliance

SUPPLIER ADHERENCE

Developed and implemented:

- Supplier code of conduct
- Modern Slavery on-boarding due diligence

MODERN SLAVERY AWARENESS

- Internal Training for key personnel
- Alignment with Allianz Australia



MODERN SLAVERY CLAUSE

Inserted within all Allianz Partners Template Agreements and inserted in new supplier agreements

CATEGORY AND SUPPLIER RISK ASSESSMENTS











- Discovery phase
- Review of categories
- Risk assessment of key providers

RISK MAPPING

- Mapped across categories
- Mapped across spend
- Mapped across key providers

¹ Commonwealth Modern Slavery Act 2018: Guidance for Reporting Entities <https://www.homeaffairs.gov.au/criminal-justice/files/modern-slavery-reporting-entities.pdf>

b. Modern Slavery Risk mapping: Key Findings

Type of modern slavery risk		Key findings
Roadside assistance 	Sector and Industry risk Product and services Risk Geographic Risk	On Spot repair and towing – limited processes. Battery provision – Wider review to be undertaken due to geographic and industry risks identified
Professional services 	Product and services risk	Controls varied across providers reviewed. Providers within consultancy and recruitment indicated varied progress towards their own modern slavery statements or internal awareness.
Facilities & office supplies 	Sector and Industry risk Product and services risk Geographic risk	Limited controls evidenced with providers indicating a limited awareness to modern slavery. Providers held a range of employee policies.
Rental vehicles and taxi 	Product and services risk	Rental vehicles indicated good controls in place with awareness to modern slavery.
General and admin 	Product and services risk Geographic risk	Reasonable controls evidenced across the providers reviewed.
Marketing, print & advertising 	Product and services risk Geographic risk	Evidenced high activity around modern slavery awareness with key providers supporting a range of initiatives. Smaller providers within the sub-category require further evaluation across their supply chain.
IT data & telephony 	Sector and Industry risk Product and services risk Geographic risk	Wider review to be undertaken due to product and geographic risks.
Logistics and shipping 	Sector and Industry risk	Evidenced a high activity around modern slavery awareness with providers reviewed. Further expansion to small providers to be undertaken.
Travel & entertainment 	Sector and Industry risk Geographic risk	Evidenced controls in place with key travel agent partner, further exploratory works across accommodation providers to be undertaken.
Home & lifecare 	Sector and Industry risk Product and services risk	Wider review to be undertaken due to product and geographic risks.

04. DESCRIBE THE ACTION TAKEN BY THE REPORTING ENTITY TO ASSESS AND ADDRESS THESE RISKS, INCLUDING DUE DILIGENCE AND REMEDIATION PROCESSES

Following the United Nation's "Protect, Respect and Remedy Framework for Business and Human Rights",² the below process describes how human rights are assessed and addressed by Allianz Partners.

a. Policy commitments

Allianz Partners Modern Slavery Functional Rule

The Allianz Partners Modern Slavery Functional Rule aims to support all employees, representatives, officers and contractors to make decisions that align with Allianz Partners' approach to modern slavery. This includes how we identify, address and report on modern slavery risks and incidents.

Allianz Partners' Procurement Policy

Allianz Partners' Procurement Policy requires that we mitigate modern slavery risks and requires suppliers to comply with the Allianz Partners Supplier Code of Conduct.

b. Human Rights Due Diligence Process

Allianz Partners Vendor Integrity On-Boarding Screening

Allianz Partners expects its suppliers to have similar values in relation to modern slavery and as such all new suppliers must be vetted through our Vendor Integrity Screening process.

Supplier Contracts

Since January 2019, Allianz Partners has inserted a modern slavery clause in its supplier template agreements. The clause is also included in all new supplier agreements, and existing supplier agreements which are being varied or extended.

Allianz Partners Supplier Code of Conduct

The Allianz Partners Supplier Code of Conduct requires all on-boarded suppliers to comply with applicable laws and regulations in the jurisdiction where goods and services are sourced, procured or performed.

Modern Slavery Risk Assessment

Allianz Partners has conducted modern slavery risk assessments across an extensive category of providers in the form of a questionnaire. The questionnaire is either completed by the supplier where the supplier must provide evidence with their response or by Allianz Partners based on the supplier's publicly available website. The questionnaire provides insights into the maturity of a supplier's due diligence programs and supply chain transparency.

We have developed a Modern Slavery risk assessment tool, which we use to assess the potential modern slavery risks and to decide whether to conduct business with suppliers.

² Guiding Principles on Business and Human Rights: Implementing the United Nation's "Protect, Respect and Remedy" Framework, United Nations, 2011
https://www.ohchr.org/documents/publications/guidingprinciplesbusinessshr_en.pdf

Reporting Suspected Modern Slavery (Grievance Mechanism)

Allianz Partners has confidential and anonymous processes in place for whistleblowing, which have been communicated throughout the business. Any cases of suspected modern slavery practices within Allianz Partners can be reported confidentially through this mechanism. If any modern slavery is suspected, Allianz Partners has an incident reporting procedure in place for escalation and action. Information about making a protected whistleblowing disclosure is available on our intranet and on our public website:

<https://www.allianzpartners.com.au/>

Awareness and Education

Allianz Partners has provided modern slavery training to key personnel to educate the business about our modern slavery reporting obligations. We have also given regular updates to the Allianz Partners Risk Committee about modern slavery, formed a modern slavery-working group, distributed internal communications about modern slavery and planned training for the wider business in conjunction with Allianz Australia Insurance Limited.

Training and Capability Building

We are sourcing a Modern Slavery training package appropriate to our business.

Risk Mapping

Allianz Partners' risk mapping aims to identify high and medium modern slavery risks across our operations and supply chains. Each category assessed is risk rated using the Allianz Partners risk matrix, which the relevant business unit is accountable for managing. Annual supplier reviews will also address any concerns raised through this exercise.

c. Processes to Enable Remediation

Remediation Process

Allianz Partners is introducing a process to investigate and remediate (as required) any cases of suspected modern slavery practices reported using either Allianz Partners incident reporting procedure or via our anonymous whistleblowing hotline. The remediation process will be aligned with the Allianz Partners Compliance Incident and Breach Management Procedures.

05. DESCRIBE HOW THE REPORTING ENTITY ASSESSES THE EFFECTIVENESS OF THESE ACTIONS

a. Modern Slavery Risk Mapping Review

Allianz Partners' focus in the lead up to this statement was to put in place measures and processes to assess modern slavery risks. These measures include the on-boarding, contracting and risk review processes detailed above.

The following activities have taken place:

- Stakeholder engagement;
- Performance tracking KPI measuring total contracts which include the standard Allianz Partners modern slavery clause;
- Establishment of the Allianz Partners modern slavery working group to implement the modern slavery framework;
- Enhancement of the on-boarding process to incorporate modern slavery questions within the vendor integrity screening process and the Supplier Code of Conduct;
- On-going communication, awareness raising activities and training to ensure employees understand our approach to modern slavery;
- Modern slavery risk assessments review and capture.

b. Future Actions

- Undertake further detailed investigations of identified high-risk categories that Allianz Partners operates within;
- Include modern slavery within quarterly reviews for high and medium risk providers;
- Expand modern slavery risk assessments;
- Strengthen and enhance our due diligence (policies, procedures and controls);
- Implement processes to identify and remediate modern slavery within our supply chains;
- Align with Allianz Australia on training and awareness programs about modern slavery;
- Understand our modern slavery risks in detail and report and demonstrate transparency within our supply chains;
- Take part in industry forums and collaborate with industry stakeholders to support initiatives, which aim to educate and address modern slavery related issues; and
- Deep dives into identified categories within our supply chains.