

### Anti-slavery and human trafficking statement

Sedgwick Australia





### Purpose and summary

This statement has been issued to address global concerns regarding Modern Slavery. Multiple laws and regulations have been published such as, but not limited to, the UN Global Compact, the Modern Slavery Act 2015 (UK), Private Bill 501 (France), and the Australian Modern Slavery Act 2018.

This statement sets out the steps taken by Sedgwick Australia Pty Limited (ACN 003 437 161) and the entities it owns and controls ('Sedgwick Australia'), as part of Sedgwick International ('the Group'), to prevent modern slavery and human trafficking happening within our business and our supply chain in accordance with section 16 of the Australian Modern Slavery Act 2018.

Sedgwick Australia provides direction to the entities it owns and controls regarding the management and implementation of modern slavery measures, which is aligned with the approach of Sedgwick International, hence this statement covers the steps taken by Sedgwick Australia and its subsidiaries. Our ethical values and standards are the foundation of the way we conduct our business. The Group is committed to preventing acts of slavery and human trafficking from occurring within our business and supply chain. We also expect the same commitment from our colleagues and suppliers.

We recognise that slavery and human trafficking exist in the modern world, and that it is a global and growing issue. We, and all of our colleagues, together with those who work with and on behalf of the Group, have a responsibility to ensure no form of slavery or human trafficking exists in our business, our supply chain, or the supply chains of those with whom we choose to partner.

We expect our colleagues, or anyone working with or on behalf of the Group, to raise any concerns they have using the designated reporting channels, so that the Group can take appropriate action.





# Structure of the organisation

Sedgwick Australia is an operating division of Sedgwick International, a division of Claims Management Services. Sedgwick Australia has 703 employees across its 28 offices in Australia, with its head office located in Sydney. Sedgwick Australia's primary operations and services reflect those of the Group.

The Group is a leading global provider of integrated, technology-enabled, business solutions primarily for the investigation and resolution of insurance claims. We have a broad range of resources, which we utilise to tailor our services to our insurer clients' specific needs in property, casualty, marine, benefits and other lines.

Through the experience and expertise of our 27,000 colleagues, operating in more than 60 countries, we work to remove process complexity, to enable us to provide an efficient customer focused service which meets the needs of our clients and their customers.

Our operation includes several businesses, working on all parts of the risk life cycle, including pre and post loss. These include experts in surveying, engineering, construction, forensic accounting, training, fire origin, environmental risk, and contractor management. Some of these experts will visit claim locations to assess loss/ damage and to agree the necessary remediation work. During such visits they will engage with other parties, including our appointed suppliers, and experts appointed by other interested parties. Other colleagues handle claims remotely, either from an office or their own homes. Such handlers will interact with suppliers by email or telephone but will not meet with them.

To deliver our services we work with a range of suppliers. Some of these

provide services that support the Group and our colleagues (e.g. IT services and support functions). Others provide services that align with either our investigation of claims (e.g. medical experts) or the fulfillment of claims (e.g. building contractors). Some of these suppliers contract with us for the services they provide, but others are either acting on behalf of the insurer we are appointed by, or our client's customer.

We seek to ensure that the way in which we choose our business partners, purchase goods, services, and facilities, reflects our commitment to equality, diversity, inclusion and ethical trading values, including the prevention of slavery and human trafficking.

To find out more about the nature of our business, please go to **www.Sedgwick.com.** 





# Risk and compliance



#### **Identifying risks**

Sedgwick Australia regularly convenes Risk Forums. Our Risk Forums are made up of a cross section of senior management representatives, who meet to discuss all matters relating to risk management, including analysing new and emerging risks, and identifying appropriate solutions. The remit of our forums includes identifying risk internally and within our supply chain, monitoring potential risk areas and identifying ways to reduce risks including those of slavery and human trafficking.

#### **Assessing risks**

Sedgwick Australia also undertakes a modern slavery risk assessment on its top 10 suppliers ('Risk Assessment'). This was most recently undertaken in March 2022, after the reporting period covered by this statement. Sedgwick Australia's Risk Assessment found that none of its suppliers are providing it with high-risk goods and none of them are from high-risk countries. Further, Sedgwick Australia operates in a high-tech, professional and scientific industry and its top 10 suppliers were all classified as low risk. The top 10 suppliers included providers of real estate services, IT communication services and infrastructure solutions, office fit-outs, disaster restoration services and telecommunication services.

All of Sedgwick Australia's top 10 suppliers either had their own modern slavery statement on their website or completed a questionnaire that was provided to them.

The Group regularly evaluates the nature and extent of its exposure to the risk of modern slavery occurring in its supply chain by monitoring its relationship with its partners and ensuring that regular due diligence checks of key suppliers are undertaken.

Generally, we do not consider that we operate in high risk sectors, or locations. We only work with well-known and proven suppliers who meet our due diligence criteria.

Where we identify a potential risk it is recorded, assessed and remedial action taken.

We ensure all our suppliers adhere to our high standards of social responsibility and ethical dealings. We enforce a strict code of compliance and do not tolerate any form of slavery, human trafficking, or worker exploitation within our supply chains. If we find evidence of a failure to comply with our policies, we will immediately seek to terminate our relationship with the relevant supplier.



## Policies and controls

As part of our commitment to combating slavery and human trafficking we have implemented several policies. These policies have been written by the relevant areas of the business, including Legal, Colleague Resources and Risk & Compliance and they are subject to annual review to ensure they remain up to date and relevant.

#### Recruitment

Our Code of Conduct and Ethics Policy sets out our commitments in certain key areas. These include the creation of a working environment where all colleagues are treated with dignity and respect. It also confirms that the Group will not enter a business arrangement with any organisations which do not acknowledge the human rights of

their workers. Neither will we accept arrangements or processes that breach, or which may breach, the human rights of those affected by the Group or its supply chain's activities.

The policy also sets out our worker's rights. These include the Group ensuring that our colleagues are aware of their entitlement regarding minimum terms

of engagement, annual leave, and sick leave.

#### Colleagues

Colleagues are expected to abide by the standards set forth in our Code of Conduct and Ethics Policy, Equality, Diversity and Fair Treatment Policy, and/ or the applicable Colleague Handbook for their jurisdiction. These documents set forth our standards in respect of the way we expect colleagues to behave, including our commitment to ensuring we conduct ourselves in an ethical

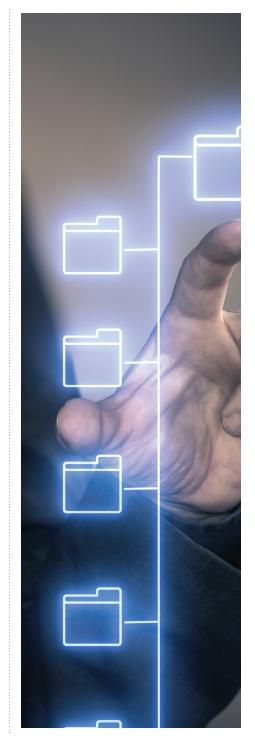
way, preventing any type of slavery, servitude, human trafficking and forced or compulsory labour. These documents also set out the mechanism by which colleagues can, confidentiality, report any concerns they have to the Group using our Ethic Hotline.

#### Modern Day Slavery guidelines

During the reporting period covered by this statement, Sedgwick Australia developed and published our Modern Day Slavery Guidelines.

The Guidelines are aimed at all Sedgwick staff, and those who provide services on our behalf, who may potentially witness indicators of modern slavery. The purpose of the Guidelines is to assist staff to recognize modern slavery and to report concerns.

The Guidelines set out the five key ways in which perpetrators may seek to exploit victims and lists the signs to look out for to identify potential victims.





# Due diligence

As part of our efforts to monitor and reduce the risk of slavery and human trafficking occurring within our supply chains, we have adopted various due diligence procedures.

Our internal policies include undertaking regular reviews of our key suppliers. Our due diligence questionnaires, which

are used to structure and record these reviews, include specific questions about the supplier's policies and training on Modern Slavery, and how they work to prevent slavery and human trafficking within their business and their supply chain.

Our service contract with our suppliers requires that they adhere to high standards of social responsibility

and ethical dealings. This includes a requirement that any suppliers with whom we partner to commit to trading and operating ethically in their dealings with all parties, including our clients, their customers, other suppliers, stakeholders, and public interest groups. Inclusive of our supplier agreements are our standards and our expectations of behaviour, including those relating to the engagement of labour, terms and conditions of employment, treatment of

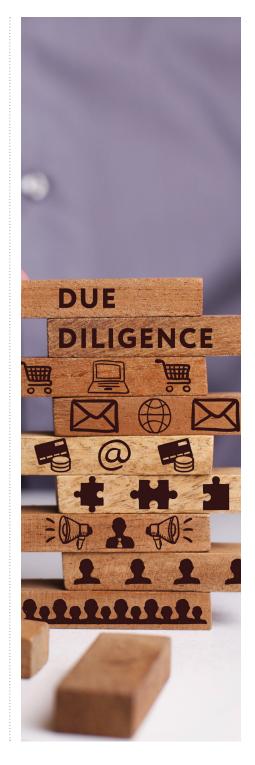
those who work on behalf of the supplier, prevention of discrimination, and prevention of child and enforced labour. In addition, we require agreement that the supplier will adhere to employment legislation prevailing in the countries in which they operate. We also maintain a **Whistleblowing Policy,** which is principally aimed at our colleagues, but is also available to others working with, or on behalf of, the Group. It encourages the reporting of any concerns of wrongdoing, including human rights violations

relating to slavery. All reports of alleged wrongdoing are fully investigated, and appropriate remedial action taken.

Our procedures are designed to:

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- Establish and assess areas of potential risk in our business and supply chains
- Monitor potential risk areas in our business and supply chains
- Reduce the risk of slavery and human trafficking occurring in our business and supply chains
- Provide adequate protection for whistleblowers.





## Effectiveness

The Company uses key performance indicators (KPIs) to measure our success in ensuring that slavery and human trafficking is not taking place in any part of our business or supply chains. These are as follows:

- Ensure all Sedgwick International colleagues receive modern day slavery training on induction and an annual basis
- Conduct annual due diligence reviews on a percentage of suppliers/vendors deemed high risk, with a view to expanding the scope of the risk assessment
- Issue annual communication to all colleagues to raise awareness on how to identify signs of modern-day slavery and how to report actual, or suspected, instances





# Training



We invest in educating our staff to help them recognise the risks of modern slavery and human trafficking in our business and supply chains. Through our training programmes, employees are encouraged to identify and report any potential breaches of our anti-slavery and human trafficking policy. Employees are taught the benefits of stringent measures to tackle slavery and human trafficking, as well as the consequences of failing to eradicate slavery and human trafficking from our business and supply chains.

As part of our induction training all colleagues are required to complete an Ethics and Compliance module, which includes a section on Modern Slavery. It provides information on what modern slavery and human trafficking is and sets out the Group's policy in this regard, and how to report any concerns a colleague may have.



# Further actions and sign-off

Following our review of our actions this financial year to prevent slavery or human trafficking from occurring in our business or supply chains, we intend to take the following further steps to tackle slavery and human trafficking:

- Fully review and enhance our existing policies
- Update our supplier contracts to reinforce our requirements on the prevention of slavery and human trafficking in our supply chain
- Develop and implement new training for all colleagues
- Enhance our supplier due diligence audits

This statement constitutes the Group's slavery and human trafficking statement for the financial year 2021/2022.

This statement was approved by the Board of Sedgwick Australia on: 28 June 2022

#### Ian Muress

Chief Executive Officer International



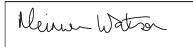
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