



2021 Modern Slavery Statement

Acknowledgement of Country

In the spirit of reconciliation, Allianz Australia acknowledges the Traditional Custodians of Country throughout Australia and their connection to land, sea and community. We pay our respects to their Elders past, present and emerging and extend that respect to all Aboriginal and Torres Strait Islander peoples.

Reporting Entities

This statement is made in respect of Allianz Australia Limited and its subsidiaries. The term "Allianz Australia" as used in this statement, refers collectively to Allianz Australia Limited and its subsidiaries listed on page 17.

This statement is submitted as a joint statement of Allianz Australia Limited, Allianz Australia Insurance Limited, Allianz Australia Services Pty Limited and Allianz Australia General Insurance Ltd made under section 14 of the Australian *Modern Slavery Act 2018* (Cth). It references Allianz Australia's activities within our financial year 2021, the period of 1 January 2021 to 31 December 2021. Further details of the reporting entities under the Australian Modern Slavery Act are set out on page 17.

Approval

This Statement was approved on 20 May 2022 by the Board of Allianz Australia Limited on behalf of all the named reporting entities and has been signed by Richard Feledy, Managing Director (page 3).



Richard Feledy
Director of Allianz Australia Limited
20 May 2022

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Message from our Managing Director



Allianz Australia has been supporting Australians secure their futures for over 100 years. We acknowledge our responsibility to advance human rights across our business as an employer, buyer, insurer, investor and corporate citizen. Allianz Australia takes an active stance against modern slavery, child and forced labour and has zero tolerance towards human rights violations.

In 2021, we continued to build on the foundations of our modern slavery approach established in 2020, strengthening our ability to identify and respond to modern slavery risks as they present across our operations and supply chain. We have collaborated with customers, employees, suppliers and external stakeholders to scale our impact, integrating social sustainable practice into our core business activities.

There is more to Allianz Australia than just insurance and we recognise the ongoing COVID-19 pandemic has highlighted systemic social challenges faced by people in the communities where we work. Existing vulnerabilities of customers and employees have been exacerbated, and this has shaped how we have prioritised our actions throughout the year. We are committed to continuous improvement and we will continue to enhance our response as society recovers from COVID-19.

Richard Feledy
Director of Allianz Australia Limited
20 May 2022

2021 Key Actions

1.

Enhanced our Code of Conduct to detail expectations of employees and other key stakeholders to respect human rights.

2.

Introduction of the Sustainability Sub-Committee governance forum to provide oversight of the Sustainability Strategy, including human rights and modern slavery risk mitigation.

3.

Expanded our organisational risk mapping across agencies and brands to strengthen our understanding of modern slavery risk specific to the demographics they service.

Our Approach to ESG Risk

Integrating sustainability into everything we do.

Allianz Australia aims to identify, prevent and mitigate adverse human rights impacts linked to our operations and supply chain. To contribute to more inclusive and stronger societies we seek to embed human rights considerations throughout our core business activities, as follows:



As a buyer



As an employer



As an insurer



As an investor



As a corporate citizen

We stand for respect for human rights as a minimum standard for responsible business, both within and beyond our direct operations. We proactively tackle human rights issues that could be impacted by our business and this is an expectation that is reflected by expanding legislation.

We believe that business can only thrive as part of an equitable society. Collective social responsibility has never been so important. We must come together to create and scale our positive societal impact through collaboration and engagement, especially for next generations.

Our Structure, Operations and Supply Chain

At Allianz “We secure your future.” It’s our purpose, our reason for being. It’s why we exist. We are committed to helping secure the futures of our customers and employees, and we use our global and local experience to tackle some of the most significant societal issues, including climate change and mental health.

Allianz Group is one of the world’s largest insurance companies, providing support to over 100 million customers across 70 countries. Allianz Australia is one of the largest providers of general insurance in Australia serving over 3 million customers’ insurance needs. Allianz Australia also insures around 25% of the top 200 ASX companies, making us one of the leading private workers compensation insurers in Australia. We employ over 5,000 people across Australia and New Zealand. Allianz Australia Limited is the parent company in Australia that controls all the subsidiaries listed on page 17. For the relevant reporting period, the Head Office of Allianz Australia is at Level 16, 10 Carrington Street, Sydney NSW 2000.

Specialist Brands and Services



A specialist marine underwriting agency



Australia’s leading distributor of pleasure craft insurance



The leading premium funding company in Australia and New Zealand, providing “Easy Cash Flow Solutions” for today’s business community



Leading provider of tailored transport insurance solutions, including commercial motor, motor fleet, carriers transit and public liability



Leading provider of crop insurance in Australia

Products and Services

Allianz Australia, through its subsidiaries, offers a wide range of insurance and risk management products and services.



Personal Insurance
Home, contents, motor, boat, travel and compulsory third-party insurance



Business, Commercial and Industrial Insurance
Transport, trades and services



Corporate Insurance
Marine, construction, liability, professional indemnity, property, transport and machinery



Public and Products Liability



Workers Compensation

Our Supply Chain

Allianz Australia has a deep supply chain that supports our business operations and the services we provide our customers. Our procurement functions are responsible for the process, reporting and governance of goods and services commonly procured by Allianz Australia. In 2021, Allianz Australia identified the need and explored different options to improve its reporting systems to better capture supplier data.

Procurement is primarily managed by two functions:

1. Claims Procurement: manages relationships with suppliers who fulfil our customer claims where possible, as customers may have the opportunity to nominate their own claims fulfilment providers in certain circumstances.
2. Corporate Procurement: manages non-claims suppliers who provide goods and services commonly consumed by Allianz Australia.

The infographics to the right of the page visualise Allianz Australia's supply chain and unless otherwise stated, goods and services are procured from Australian businesses. Allianz recognises the need to deepen its understanding of our supply chain and as part of our continuous improvement approach, will seek to work with suppliers to further identify and understand the origin or source country of our purchases beyond our direct supplier relationship, i.e. Tier 2 and 3 suppliers.

Description of supply chain tiers
Tier 1: We have a direct relationship with the goods and services provider
Tier 2: Goods and services provider is a supplier for tier 1
Tier 3: Goods and services provider is a supplier for tier 2

Corporate Functions	
Business Operation:	Description of supply chain
Corporate Governance	<ul style="list-style-type: none"> Tier 1 includes charity partnerships, consulting and professional service providers
Customer Service and Retail Distribution Direct	<ul style="list-style-type: none"> Outsourced Services: Selected operations (Allianz Services) See further information under Outsourcing Arrangement on page 6
Information Technology	<ul style="list-style-type: none"> Tier 1 includes hardware, software and operations Outsourced Services: Infrastructure and testing (Allianz Technology)
Human Resources and Finance	<ul style="list-style-type: none"> Tier 1 includes employee assistance programs, professional service providers and recruitment agencies
Market Management	<ul style="list-style-type: none"> Tier 1 includes assessor uniforms, internal events, promotional merchandise and sponsored events
Procurement	<ul style="list-style-type: none"> Tier 1 includes claims goods and services, fleet management, office suppliers, and travel
Property and Facilities	<ul style="list-style-type: none"> Tier 1 includes catering, landlords, leased properties, post and mailroom, secure destruction and archiving Tier 2 includes building facilities management Tier 3 includes cleaning, maintenance providers and security
Risk and Compliance and Internal Audit	<ul style="list-style-type: none"> Tier 1 includes consulting professionals
Technical	<ul style="list-style-type: none"> Tier 1 includes printing and warehouse services

Insurance Products and Services	
Business Operation:	Description of supply chain
Business partners / unowned agencies	<ul style="list-style-type: none"> Tier 1 Includes brokers, financial institution partners and unowned agencies
Claims	<ul style="list-style-type: none"> Outsourced Services: Selected operations (Allianz SE)
Motor Vehicle Claims	<ul style="list-style-type: none"> Tier 1 includes contracted suppliers and panel repairers Tier 2 includes sub-contracted suppliers (parts or speciality services) and parts sourced by suppliers
Property Claims	<ul style="list-style-type: none"> Tier 1 includes building panels, electrical suppliers (digital and white goods), flooring suppliers, investigators, jewellery suppliers and loss adjusters Tier 2 includes builders, engineer, restoration and other specialists Tier 3 includes building materials sourced by builders
Market Management	<ul style="list-style-type: none"> Tier 1 includes assessor uniforms, internal events, promotional merchandise and sponsored events

Investments	
Business Operation:	Description of supply chain
Custodian	<ul style="list-style-type: none"> Outsourced Services: NAB Asset Servicing via National Nominees Limited
Owned financial management company	<ul style="list-style-type: none"> Outsourced Services: PIMCO (owned by Allianz SE) and Allianz Investment Management (owned by Allianz SE)
Third party fund managers	<ul style="list-style-type: none"> Tier 1 investment bonds, securities, corporates, cash, alt debt, infrastructure and real estate

Outsourcing Arrangements

Allianz Australia has several established material outsourced providers across a range of business services. In 2020, Allianz Australia identified two outsourcing entities that operate in inherently high-risk geographies, Allianz Services and Allianz Technology. In the 2021 reporting period we have sought to further understand the structure of Allianz Services, operations and how modern slavery risk may manifest in our businesses. This work will continue in 2022.

Outsourced Arrangement with Allianz Services

Allianz Australia started business process offshoring with Allianz Services in Trivandrum, India in 2015. Allianz Australia entered this arrangement to gain efficiency through cost differential between Australia and India, leverage group scale and skill, and use a 'follow the sun' model to be able to service customers outside of regular Australian business hours.

Offshoring to Allianz Services is executed following a standard framework built to comply with legal and regulatory requirements and the Group Outsourcing Policy. Allianz Australia's offshoring program is governed by the Allianz Australia Outsourcing Committee. As of 2021 the current footprint of 330 full time employees across Consumer Contact Centre, Short Tail Claims and Customer Care.

Outsourcing Entity	Outsourced Services	Location
Allianz Services	<ul style="list-style-type: none"> Contact Centre (Customer Care (Claims), eSupport, Sales and Services and Webchat) Claims include Indexing, Property Fulfilment and Motor Fulfilment Credit Services Operational Management Project Services Underwriting Operation 	<ul style="list-style-type: none"> India
Allianz Technology	<ul style="list-style-type: none"> IT Implementation & Support: Security IT Implementation & Support: Infrastructure & Cloud IT Implementation & Support: Applications IT Advisory & Project Delivery 	<ul style="list-style-type: none"> Australia India Germany Singapore Thailand



Our Identified Modern Slavery Risks

Modern slavery includes trafficking in persons, slavery, servitude, forced marriage, forced labour, debt bondage, deceptive recruiting for labour or services and the worst forms of child labour.

In identifying our modern slavery risks, we recognise a potential continuum of 'involvement' which explains that companies may cause, contribute or be directly linked to adverse human rights impacts through their operations and supply chain.



Risks of involvement in modern slavery



An organisation may cause modern slavery if its own activities result in a modern slavery impact.



An organisation may contribute to modern slavery if its activities significantly contribute to modern slavery caused by another party, including acts or omissions that may facilitate or incentivise modern slavery.



An organisation may be directly linked to modern slavery if the impact is directly linked to its operations, products or services by its business relationships.

Modern Slavery Risk in our Core Business Activities

We use a combination of sector and country-specific approaches to identify human rights risks.



As a buyer, we acknowledge there is a risk we are directly linked to modern slavery if our external partners engage in these offences. We understand that our risk is compounded in single sourcing spend, off contract spend, spend with non-preferred suppliers selected by customers for claims fulfilment and with suppliers that practice subletting or where visibility of the extended supply chain is not practicable. Our procurement process is governed by the Procurement Policy and our relationship with suppliers is governed under the Vendor Code of Conduct, outlined on page 10.



As an employer, we acknowledge there may be a risk that we are directly linked to modern slavery in our direct and indirect workforce including vulnerable employees. We understand our risk is compounded in relation to low-skilled, indirect employment arrangements and in countries that are higher risk for modern slavery. We have assessed the risk as low for our employees located in Australia and New Zealand and whose labour rights are protected under the Allianz Australia Group Business Partnership Enterprise Agreement and rigorous laws and regulations on labour rights in the local jurisdictions. However, we recognise that modern slavery is still a risk due to existing vulnerabilities of some workers and limited visibility over labour provided through labour hire arrangements.



As an insurer, of individuals and businesses predominantly located in Australia, we acknowledge there may be a risk that we contribute to or are linked to modern slavery through our underwriting activities. We understand that this risk may arise where we provide insurance services to customers that offer products or services that are considered high risk for modern slavery, or operate in sectors or geographies which are considered high risk for modern slavery. Our underwriting practices are subject to strict Underwriting Guidelines which include processes to identify and assess ESG risks (including modern slavery risk) for manually underwritten policies. We have also instituted processes around our underwriting activities to ensure that they are undertaken in line with our 'Care Model' which supports vulnerable customers, see further detail on page 11.



As an investor, we acknowledge there is a risk we may contribute to or be directly linked to modern slavery if our investments facilitate these offences. We understand our risk is compounded through equity/debt issues in inherently high-risk geographies and sectors. Our investment portfolio is subject to robust governance protections, outlined on page 13.



As a corporate citizen, we acknowledge there is a risk that we could be directly linked to modern slavery if the organisations we support through our charity and donations facilitate these offences. Our corporate giving practices are governed by the internal Allianz Guidance for Charitable Donations and Memberships (Corporate Giving).



Known Inherently High-Risk Categories

Entity Risk	Organisations that may have higher inherent modern slavery risks compared to their peers, product or industry due to unethical values and behaviours, poor governance structures, or a track record of labour/ human rights violations
Geographic Risk	Countries, regions or jurisdictions that may have higher inherent modern slavery risk due to factors including limited regulation of labour rights, conflict, socio-economic issues
Goods and Services	Goods and services that may have higher inherent modern slavery risks because of the way they are produced, provided or used (including unintended consequences of design)
Sector and Industry Risk	Sectors and industries that may have higher inherent modern slavery risk because of their characteristics, products and processes

In 2020, we undertook a risk analysis across our Claims and Corporate Procurement spend categories, as outlined on page 9. In 2021, Allianz Australia's modern slavery risk methodology assessed the inherent risk of the goods, services and suppliers and facilitated the implementation of controls and the ongoing management of residual risk. In 2021 we have identified specific categories of goods and services to Allianz Australia as presenting higher modern slavery risk, which includes the summary on page 9.

To deepen our understanding of how risks manifest through our goods and services we have worked to establish a Modern Slavery Working Group, which in 2022 has been adopted by the Insurance Council of Australia. This forum brings together industry specialists to share information and resources to address these shared modern slavery risks, as outlined on page 14. We will continue to uplift our approach and strengthen our understanding of our supply chain risks in the 2022 reporting period.



Claims Procurement

In 2021 Allianz Australia, leveraging international indexes such as the Global Slavery Index, identified the categories of goods and services outlined in the table below present with a higher modern slavery risk in the Claims Procurement space. Further to this we recognise that the identified risks associated with the spend categories for Claims Procurement, outlined below, are inherent to the insurance business model.

Where possible, Allianz Australia has established preferred supplier relationships across Australia, which enables us to have visibility over employment practices, set expectations and monitor compliance with our standards. However, customers have the flexibility to select their own repairer, which limits our degree of influence and visibility over some of the goods obtained in this category.

We have identified the risks as set out below and investigated these areas, which will be prioritised in the 2022 reporting period.

Procurement	Inherently High Risk Categories in Our Supply Chain	Modern Slavery Risk Type	Description of Risk
Claims Procurement	Building and Property	Geographic Industry Goods	Suppliers are engaged in this category for building and property repair and maintenance provided in accordance with our Home, Building and Contents insurance products.
			Suppliers of goods and services for building and property repair and maintenance may present modern slavery risks where the construction materials or equipment used are manufactured offshore in high risk jurisdictions or using high risk raw materials. Modern slavery risks may also arise as a result of labour hire practices which are common in the property and construction sector.
	Electrical and White Goods	Goods	Suppliers are engaged in this category for our Home, Building and Contents insurance products. Several panel suppliers identified that their materials were sourced from the Asia Pacific region including inherently high-risk geographies such as China and Vietnam.
	Flooring	Geographic Industry	Suppliers are engaged in this category for our Home, Building and Contents insurance products. Panel suppliers indicated that their products are predominately manufactured and wholesaled locally in Australia from imported materials including inherently high-risk geographies such as China, India and Malaysia. A supplier has indicated modern slavery risks may manifest where they do not have visibility over the goods and services their direct suppliers source from overseas locations.
	Jewellery	Industry Geographic	Suppliers are engaged in this category for our Home, Building and Contents insurance products. Several panel suppliers have indicated they source products including loose diamonds from inherently high-risk geographies such as China, India and Israel. Suppliers have indicated modern slavery risks may manifest where the traceability of diamonds is unclear and in offshore manufacturing locations with low visibility of labour practices.
Motor Vehicle Repair	Industry	Suppliers are engaged in this category for our Motor Insurance and CTP Products. For example, glass products sourced from China may present modern slavery risks. Such modern slavery risks may manifest as it relates to labour conditions and child labour in the supply chain of key materials including glass, aluminium and timber.	

Corporate Procurement

In 2021 Allianz Australia, leveraging international indexes such as the Global Slavery Index, identified the categories of goods and services outlined in the table below present with a higher modern slavery risk in the Corporate Procurement space.

We recognise the identified risk associated with the spend categories for Corporate Procurement, outlined below, are known as presenting risk based on the geography, product, sector or industry which may exist across the financial services and insurance market.

As part of our continuous improvement approach in the upcoming reporting period, Allianz Australia will continue to support suppliers who, through the Modern Slavery Questionnaire, have demonstrated a low understanding of modern slavery risks relevant to their business. This will assist these suppliers in identifying and managing their modern slavery risks and strengthen our understanding of risk along the extended supply chain.

Whilst we are not directly involved in the spend categories, we have identified the risks as set out below and investigated these areas, which will be prioritised in the 2022 reporting period.

Procurement	Inherently High Risk Categories in Our Supply Chain	Modern Slavery Risk Type	Description of Risk
Claims Procurement	Cleaning	Industry	Allianz Australia procures cleaning services and maintains direct relationships with suppliers for its office sites. Modern slavery risks may also manifest in the sourcing of low skilled labourers and vulnerable workers who may be subject exploitative practices.
			Suppliers have indicated that modern slavery risks may manifest in their supply chain for the provision of cleaning chemicals, equipment, uniforms, and specialists in the areas of high-rise window cleaning, hygiene and waste removal.
	Security Services	Industry	Allianz Australia procures security services and maintains direct relationships with suppliers for its office sites. Modern slavery risks may manifest in the sourcing of low skilled labourers and vulnerable workers who may be subject exploitative practices.
	Office Supplies	Geographic Goods	Allianz Australia maintains a relationship with a corporate stationary supplier. Although our Credit Card Policy does not permit employees to directly purchase stationary, we recognise there is increased risk given the lockdown and working from home arrangements that employees may purchase office supplies on their corporate purchasing card meaning Allianz has limited visibility over the practices of the stationary supplier.
Hotel	Industry	Allianz Australia procures hotel services and maintains direct relationships with suppliers. Allianz acknowledges there may be potential modern slavery risks in hotel accommodations being used to facilitate human rights abuses including human trafficking, sex trafficking and other forms of exploitation.	

Our Actions to Address these Risks

2021 Highlights

Objective: Strengthen our understanding of modern slavery risk in our operations and supply chain.
Action: Review and expand risk mapping to our agencies.
Outcome: 45 risk maps updated.

Objective: Strengthen our understanding of supplier risk, mitigation and management maturity.

Action: Engage with inherently high-risk suppliers, identified through our robust risk analysis by conducting Modern Slavery Questionnaires to understand their business specific risks.

Outcome: 67 questionnaires analysed.

Objective: Build awareness and capability for our workforce to identify, manage and escalate modern slavery risk.

Action: Completion of Modern Slavery Training Module training.

Outcome: Approximately 740 employees trained.

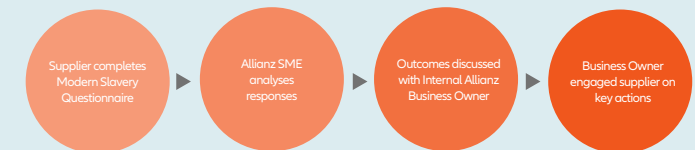


As a Buyer

In 2021, we revised our category risk maps across the business to provide a current view of inherent risk and identify any control gaps. Allianz expects our service providers, suppliers, sub-contractors and business partners to adhere to the standard it holds itself to: to operate with transparency as it relates to the management of modern slavery risks and comply with the Allianz Australia Vendor Code of Conduct.

Building off our risk mapping exercise, several suppliers were asked to complete one of a suite of Modern Slavery Questionnaires, which interrogates modern slavery risk factors specific to the good or service. The questionnaire requires suppliers to provide comprehensive information on how they mitigate and manage inherent risk. Responses are assessed by a modern slavery specialist to determine whether the supplier's practices meet Allianz expectations or whether controls and collaboration is required to uplift their response. Approximately 63 suppliers managed by Corporate and Claims Procurement have also completed some due diligence as part of their onboarding activities, which included questions relating to modern slavery risks.

As part of our continuous improvement approach in the upcoming reporting period, Allianz Australia will continue to support suppliers who, through the Modern Slavery Questionnaire, have demonstrated a low understanding of modern slavery risks relevant to their business. This will assist these suppliers in identifying and managing their modern slavery risks and strengthen our understanding of risk along the extended supply chain.



Through our discussions with suppliers, we have collaborated to address certain risks by undertaking actions including:

- Conducting and sharing Modern Slavery General Awareness Training;
- At request, reviewing small-medium enterprise Modern Slavery Statements and providing comment; and
- Providing resources and guidance to elevate their modern slavery response.



As an Employer

In 2021, we enhanced our Code of Conduct (the Code) to strengthen alignment of our purpose, promise and business strategy. The Code reflects our organisation’s values and communicates our expectations of employees, business partners, vendors and suppliers. The Code’s ‘We take Ownership and Responsibility’ pillar was uplifted in line with Allianz Group’s commitment to respect human rights. Review and acceptance of the Code forms part of employee onboarding and is reviewed annually.

Throughout 2021, we prioritised building capability in staff in targeted compliance and risk, supplier-facing and customer-facing roles to manage and report on modern slavery risks. To equip our employees with the capability to identify, mitigate and manage modern slavery risk we have introduced a mandatory Modern Slavery Training Module which also forms part of our employee onboarding.

In 2021, approximately 740 employees in the targeted roles as listed above completed the Modern Slavery Training Module. The content of our training module includes:

- Introduction to modern slavery
- Identified risk across our operations and supply chains
- Risk indicators and red flags in the financial services
- How to raise a suspicion of modern slavery offences occurring



As an Insurer

Allianz Australia recognises our customers may experience vulnerability including exploitative practices and is committed to supporting customers through these times. Additionally we understand that certain vulnerabilities can increase an individual’s risk of exploitation, such as language barriers, precarious visa status, financial abuse or employers removing access to their personal identification.

In 2021, we have introduced a “Care” model for our retail customers, including a “High Care” level and teams to support customers experiencing complex vulnerabilities, including exploitative practices. To the extent a customer experiences exploitative practices and presents to our staff with risk indicators of modern slavery abuses, customers will be directed to the High Care team. High Care teams are responsible for case managing the customer’s concern end-to-end, have had specialist training and are able to provide more flexibility in their approach. Allianz Australia will provide referrals to help customers find support, including to CareRing – a partnership with Uniting Kildonan which provides a combination of social, legal and financial supports.

Risk Mapping

In 2021, we deepened and expanded our risk mapping practises across several of our subsidiaries and business divisions, including AM&T, Club Marine, GT, Hunter Premium Funding, Primacy and TIO. With these businesses we were able to strengthen our understanding of modern slavery risk specific to the demographics they service.

6	GT and Primacy	210
agencies risk mapped	completed Modern Slavery General Awareness Training	agency employees attended training

In immediate response to the risk mapping exercise, we conducted a tailored Modern Slavery General Awareness Training with both GT and Primacy, to explain the potential risks which may manifest in their operations and supply chains.



As an Investor

Human rights related due diligence has been integrated into all 12 sensitive business areas, where relevant as part of our ESG process. This is to ensure that human rights are a part of the overall risk assessment for insurance underwriting activities and investments in non-listed asset classes. In 2021, we enhanced our ESG Due Diligence Process by introducing new ‘Keywords’ against the sensitive business areas as appropriate. For our underwriters, this uplift supports them to identify modern slavery risks and informs our decision making when insuring businesses. For our Investments team, this uplift supports their negative screening process and enables them to exclude investments that are associated with modern slavery risks and human rights violations if appropriate.

We maintain a mandatory referral list for sensitive countries where systematic human rights violations occur. Our existing onshore investments are primarily in bonds and established funds with Australian fund managers who report on modern slavery risks whereas our overseas investments are in funds set up and managed by related entities in the broader Allianz Group e.g. PIMCO. In the event that we seek to conduct business transactions located in these countries, we undertake due diligence to identify any potential human rights risks (e.g. modern slavery risks) associated with the proposed transaction(s). Due diligence is conducted in accordance with our Investment Guidelines which embed identification and consideration of risks of potential of human rights violations.



As a Corporate Citizen

When Allianz Australia donates to or partners with charitable organisations, recipients must uphold our human rights standards. The internal Allianz Guidance for Charitable Donations and Memberships (Corporate Giving) stipulates that corporate giving can only be made to organisations that meet the principles set out in the Allianz Group Code of Conduct.

Case Study: Collaborating to manage inherent risk

In fulfilling claims for contents insurance, we work with a panel of jewellery suppliers. We recognise the raw materials for jewellery (including gold, diamonds, gemstones and precious minerals) may be sourced from inherently high-risk geographies. To understand the risk along the supply chain we distributed the Modern Slavery Questionnaire to our jewellery panel suppliers. Some responses provided lacked sufficient detail so, to support a shared understanding of the risk, mitigation, and management practices in place, Allianz Australia met with these suppliers directly to better understand their practices. Together we discussed the inherent risk faced by the industry and collected details on the risk controls suppliers had or were soon to implement including industry memberships, preferred supplier relationships and responsible sourcing practices. Actions were agreed to mitigate the supplier's modern slavery risks, in line with Allianz Australia's expectations. Annual due diligence is undertaken to ensure the panel suppliers continue to meet these expectations.

Case Study: Impact of the continuing COVID-19 pandemic

The impacts of the COVID-19 pandemic further exposed the inequalities faced by people around the world. The pandemic has shone a spotlight on systemic societal challenges, with inequality and civil unrest accelerating under the uncertainty and social challenges. Allianz responded by mobilising resources to support communities around the world, including providing support to COVID-19 affected customers who may be vulnerable to exploitation (for example customers on visas, small-medium businesses, businesses operating in high-risk sectors). At Allianz Australia, we recognise the COVID-19 pandemic has impacted the structure of the Australian labour force, markets and economy, which for many individuals has exacerbated existing vulnerabilities. Throughout the reporting period, we continued to undertake supplier due diligence when working with inherently high-risk categories. We uplifted the response of these suppliers, providing Modern Slavery General Awareness Training, revising vulnerability risk indicators and collaborating on shared issues where possible. In the 2022 reporting period, we will seek to revise our risk methodology to account for the structural changes which have occurred.

Policies and Procedures

Allianz Australia has several policies and procedures that set expectations or provide guidance on our modern slavery approach which are subject to regular and ongoing review.

Policy	Audience	How it advances human rights and mitigates modern slavery
Modern Slavery Policy	All employees	<ul style="list-style-type: none"> • Sets the principles to meet the obligations under the <i>Modern Slavery Act 2018 (Cth)</i> • Outlines the objectives and structure of Allianz Australia's approach to modern slavery risk management • Provides guidance on how to identify, address and report on modern slavery risks and incidents
Code of Conduct	All employees	<ul style="list-style-type: none"> • Outlines the expectations of employees to uphold Allianz Australia's commitment to respect human rights through their practices
Procurement Policy	All employees	<ul style="list-style-type: none"> • Provides requirements for assessing vendors, specifically the due diligence practices during the onboarding process for new suppliers
Vendor Code of Conduct	All external partners	<ul style="list-style-type: none"> • Outlines requirements for all suppliers to operate in compliance with the applicable laws and regulations in the jurisdiction where the goods are sourced, procured or where the services are performed
Whistleblowing Policy	All employees and other key stakeholders	<ul style="list-style-type: none"> • Outlines the process for reporting any suspicion or known modern slavery offenses in our operations or supply chain

Enhancing our Risk Management and Governance

In 2021, we introduced the Sustainability Sub-Committee (the Sub-Committee) forum to provide management oversight of the Sustainability Strategy and its implementation. The Sub-Committee has a breadth of responsibility to embed the Sustainability Strategy into business-as-usual activities. This diagram reflects the structures in place during the reporting period.

Forum	Key Responsibilities	Membership
Allianz Australia Limited Board	<ul style="list-style-type: none"> Oversees our human rights approach and management of our human rights risks Reviews and endorses Allianz Australia's Modern Slavery Statement 	<ul style="list-style-type: none"> Managing Director Board Members
Sustainability Sub-Committee	<ul style="list-style-type: none"> Establishing, maintaining, tracking the Sustainability Strategy Integrating sustainability into the employee value proposition and customer value proposition Overseeing disclosures on sustainability including Allianz Australia's Modern Slavery Statement 	<ul style="list-style-type: none"> Managing Director General Counsel and Chief General Manager Corporate Governance and Legal General Managers across the business
Modern Slavery Working Group	<ul style="list-style-type: none"> Operationalise activities to strengthen our approach to assessing and addressing modern slavery risk 	<ul style="list-style-type: none"> Sustainability Corporate Procurement Claims Procurement



How we Raise Concerns

We recognise that effective remediation and grievance processes are critical to a robust human rights due diligence program. Governed under the Allianz Whistleblowing Policy and built into the enterprise-wide Modern Slavery Policy, Allianz Australia has introduced a process for reporting suspicions or known modern slavery offences within Allianz Australia and its subsidiaries.

Allianz Australia's Whistleblowing Policy outlines in the first instance, any suspicion or known modern slavery offence can be reported using either Allianz's incident reporting procedure or via our anonymous whistle-blower hotline which is managed by an independent third party. Reports can be raised by current or former employees, current or former directors or officers, auditors, suppliers, contractors or Business Partners (or their current or former employees) or associates; or relatives or dependants of all of the above categories are protected under the Allianz Whistleblowing Policy.

 **Faircall Website:**
allianz.kpmgfaircall.kpmg.com.au

 **Faircall Phone:** 1800 059 798 (AUS)
or 0800 000 594 (NZ)

How to raise a suspicion or report of a known modern slavery offence has been outlined on the Allianz Australia intranet site for internal employees. It has also been embedded in the Modern Slavery Training Module and was included in the Modern Slavery General Awareness Training which was delivered throughout the business, owned and non-owned agencies as outlined on page 11.

Where a report concerning modern slavery requires remediation, the process is aligned with the Allianz Compliance Incident and Breach Management Procedure under our Modern Slavery Policy. In addition to this process, the incident lead must work with a modern slavery specialist throughout the remediation process and the remediation plan needs to include appropriate remediation for the victim on a case-by-case basis.

Collaborating for Impact

We recognise that collaboration allows us to scale our response and positive impact on modern slavery. We focus on four key stakeholder groups which are most impacted by our business; customers, employees, investors and society.

During the year, we played an active role in several forums, sharing insights and experiences, focused on supporting companies to improve their modern slavery approaches. This included the following:

Forum	Purpose
UN Global Compact	We are a signatory to the UN Global Compact and a member of the Global Compact Network Australia's Modern Slavery Community of Practice, a peer forum through which we share our experiences and learn from other Australian companies in relation to modern slavery approaches
Insurance Council of Australia Modern Slavery Community of Practice	We are a member of the Community of Practice which brings together sustainability practitioners with diverse experiences, across the Insurance and Financial Services sectors. Through this forum we share ideas, knowledge and experience to collaborate on shared challenges



Assessing the Effectiveness of our Actions

At Allianz we seek to drive continuous improvement in our sustainability approach. We have built upon the foundations established in 2020.

We are committed to continually improving our approach to advancing human rights. We recognise that measures of effectiveness are critical to assist in informing appropriate actions to address our modern slavery risks. We sought to appraise the activities conducted during the year, by both tracking the output and seeking feedback from key stakeholders to gain insight into the effectiveness of our actions and inform improvement opportunities in future reporting periods. This included tracking Modern Slavery general awareness training participation, updates to policy and procedure documents and the outcomes of our risk assessments.

Objective	Measure	Output	FY22 Target
Embed modern slavery risk management across our operations' business-as-usual practices	<ul style="list-style-type: none"> Percentage of identified control gaps closed out to schedule in the reporting period 	Operational Compliance Plans	100%
Strengthen our understanding of our modern slavery risk along the supply chain	<ul style="list-style-type: none"> Percentage of medium risk suppliers which complete Modern Slavery Questionnaire 	MSQ Risk Registry	25%
Strengthening our modern slavery risk management of suppliers in inherently high categories	<ul style="list-style-type: none"> Percentage of Modern Slavery Questionnaire identified corrective actions implemented 	MSQ Risk Registry	80%
Build role specific awareness and capability to identify, mitigate, manage and report modern slavery risk	<ul style="list-style-type: none"> Percentage of identified customer facing, supplier facing and operational roles that are required to complete Modern Slavery Training Module completed 	AllianzU Learning Plans	100%
Strengthen capability of Senior Management Team on their respective roles to advance human rights	<ul style="list-style-type: none"> Conduct targeted capability training through key forums to: <ul style="list-style-type: none"> Understand salient human rights issues which affect Senior Management Team Demonstrate manageable action 	Modern Slavery Training Registry	2 Sessions



Looking Forward

We aim to further strengthen our approach to human rights integration in our core business activities whilst addressing any specific or emerging human rights issues. Key activities we will prioritise during 2022:



As a buyer

- Enhance and improve risk assessment for a better understanding of risks identified;
- Investigate risks in the inherently high-risk categories across tier 2 and tier 3 suppliers; and
- Strengthen our approach to remediation and formulate strategy tailored to the supplier risks identified for action.



As an employer

- Review and support any necessary Employee Assistance Program governance to manage complex cases (i.e. modern slavery).



As an insurer

- Develop product/service risk methodology and prioritise action;
- Investigate managed offshore services including claims management; and
- Investigate the opportunity to uplift the "Care Framework", specifically the typologies/risk indicators of individuals vulnerable to exploitation in training and process materials.



As a corporate citizen

- Conduct an additional adverse media check on our workplace giving partners.

Our Consultation Process

Allianz Australia is committed to creating and sustaining an enterprise-wide approach to assessing and addressing modern slavery risks.

We ran a tailored workshop with subsidiaries which explained the legislative requirements, provided capability building on modern slavery risks and how it is relevant to their entities and discussed an enterprise-wide approach to assessing and addressing risks and our expectations.

To develop this statement, Allianz Australia engaged in stakeholder consultations with the management teams of all subsidiaries and owned agencies in addition to consultation with centralised core functions in key business units including procurement, legal, risk and compliance, corporate affairs, corporate communication, claims, investments, underwriting and key operation areas including human resources, outsourcing, property and facilities management, market management, finance and technical teams.

Appendix 1: Overview of Reporting Entities

This Statement is made in respect of Allianz Australia Limited and its subsidiaries. The term “Allianz Australia” as used in this statement, refers collectively to Allianz Australia Limited and each of its subsidiaries listed below. This statement is submitted as a joint statement of Allianz Australia Limited, Allianz Australia Insurance Limited, Allianz Australia Services Pty Limited and Allianz Australia General Insurance Ltd and made under section 14 of the *Australian Modern Slavery Act 2018 (Cth)*.

Company Name	ACN / Company Number
Allianz Australia Limited (reporting entity)	ACN 000 006 226
Allianz Australia Insurance Limited (reporting entity)	ACN 000 122 850
Allianz Australia General Insurance Services Pty Ltd	ACN 005 274 368
Allianz Australia General Insurance Ltd (reporting entity)	ACN 003 719 319
CIC Allianz Insurance Limited	ACN 094 802 801
Allianz Australia Services Pty Limited (reporting entity)	ACN 002 947 257
Allianz Australia Employee Share Plan Pty Ltd	ACN 004 891 972
Allianz Australia Partnership Services Pty Limited	ACN 008 412 422
Allianz New Zealand Limited	Company Number 445514
Club Marine Limited	ACN 007 588 347
Global Transport & Automotive Insurance Solutions Pty Limited	ACN 069 048 255
Allianz Australia Claim Services Pty Limited	ACN 004 133 046
Hunter Premium Funding Limited	ACN 085 628 913
Allianz Australia Workers Compensation (NSW) Limited	ACN 003 087 545
Allianz Australia Workers Compensation (Vic) Limited	ACN 059 835 791
Primacy Underwriting Management Pty Limited	ACN 070 058 212
Primacy Underwriting Management Limited (NZ)	Company number 689339
Allianz Marine & Transit Underwriting Agency Pty Limited	ACN 155 554 279
Allianz Finance Pty Ltd	ACN 128 876 335

Appendix 2: Modern Slavery Act, Mandatory Reporting Criteria

This Statement was prepared to meet the mandatory reporting criteria set out under the *Australian Modern Slavery Act 2018 (Cth)*. This table identifies where each criterion is addressed within this Statement.

Reporting Entity	Section	Pages
Identify the reporting entity	<ul style="list-style-type: none"> Disclosure Notes Appendix 1: Overview of Reporting Entities 	2, 17
Describe the structure, operations and supply chain of the reporting entity	<ul style="list-style-type: none"> Our Structure, Operations and Supply Chain 	4
Describe the risks of modern slavery practices in the operations and supply chain of the reporting entity, and any entities that the reporting entity owns or controls	<ul style="list-style-type: none"> Our Identified Modern Slavery Risks 	7
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	<ul style="list-style-type: none"> Our Actions to Address these Risks 	10
Describe how the reporting entity assesses the effectiveness of such actions	<ul style="list-style-type: none"> Assessing the Effectiveness of our Actions 	15
Describe the process of consultation with any entities that the reporting entity owns or controls	<ul style="list-style-type: none"> Our Consultation Process 	16
Any other information that the reporting entity considers relevant	<ul style="list-style-type: none"> Message from the Managing Director Looking Forward 	3,16