



**ALLIANZ PARTNERS  
MODERN SLAVERY  
STATEMENT 2022**



# INTRODUCTION



This statement, pursuant to the Modern Slavery Act 2018 (Cth), sets out the undertakings of AWP Australia Pty Ltd (Allianz Partners) to address modern slavery and human trafficking risks in our business and supply chains for the calendar year ending 31 December 2021.

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 is committed to addressing the real and growing problem of modern slavery and trafficking. Allianz Partners ensures transparency within our business, and we take an active approach to reviewing the vendors and suppliers supporting our business including the broader 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 adherence to relevant policies and procedures at Allianz Partners, including our Procurement Policy, Anti-corruption Policy, Whistleblowing Policy, Vendor Code of Conduct, Allianz Employee Code of Conduct, Outsourcing Policy and Procedures for Compliance Breach and Incident Handling.

This statement reflects the actions of Allianz Partners in addressing modern slavery during the calendar year 2021.

The Allianz Partners Board of Directors approved this statement on 23 June 2022.

**Nigel Alexander**  
CHAIR, ALLIANZ PARTNERS  
23 JUNE 2022





## ALLIANZ PARTNERS COMMITTED TO SOCIAL RESPONSIBILITY

The business of Allianz Group, which consists of Allianz SE and its consolidated legal entities including Allianz Partners, is based on trust.

To protect this trust, Allianz Partners employees must adhere to the principles set out within the Allianz Partners Employee Code of Conduct. Our partners and suppliers are asked to accept the principles for economically, socially, and environmentally sound business practices, as defined within the Allianz Vendor Code of Conduct.

## 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.

## STRUCTURE, OPERATIONS AND SUPPLY CHAINS

Allianz Partners 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:
  - o provide general financial product advice for general insurance products;
  - o 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 general insurance products; and
  - o provide claims handling and settling services, 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 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.

### Board

The Allianz Partners Board of Directors comprises:

1. Nigel Alexander, Chair, and Independent Non-Executive Director
2. Damien Ladous, Executive Director and Allianz Partners Global CEO Travel
3. Gary Townsend, Non-Executive Director
4. Julia Unkel, Executive Director and Allianz Partners Global Chief Financial Officer.

The Board is ultimately responsible for the oversight and review of management, operations and overall corporate governance of the company. The Board has delegated authority for the day-to-day running of the business to the CEO, who is supported by the Executive Committee (ExCo). The ExCo has been established as an internal management committee by the CEO to:

- work collectively to direct Allianz Partners to achieve its strategic objectives, in line with the Board's risk appetite;

- role model positive behaviours and lead our people; and
- assist the CEO and Board to make decisions which advance the interests of Allianz Partners and its stakeholders.

### Investments

As a subsidiary of Allianz Partners SAS, Allianz Partners is an operating entity within Australia with no assets outside of working capital held within our Australian banking partner, office furniture and furnishings, and office equipment.

## INSURANCE PRODUCTS AND ASSISTANCE SERVICES

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

- 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 students health cover (OSHC) and overseas visitors health cover (OVHC),
- roadside assistance through network providers including on spot repair, battery replacement, tow recovery services, and mobility service provisions including rental vehicle hire and taxi,
- travel insurance for banking clients, travel agents and direct to public through Allianz Australia Insurance Limited.

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

### Other Services

Allianz Partners also provides services to other insurers and corporations as follows:

- third party claims administration and medical repatriation services for related parties (i.e. other Allianz business units located offshore),
- health and lifecare products and services for government agencies and utility partners,
- client relationship management and telephony services for other insurers and automotive manufacturers,
- small claim home repairs for Allianz Australia Insurance Limited,
- external network provider management including roadside assistance, medical provisions & travel repatriations

Key Operations: <i>These key operations support the distribution of Allianz Partners products</i>	Supply Chains: <i>N.B. goods and service providers detailed below are located in Australia unless specified otherwise.</i>
<b>Sales</b>	<ul style="list-style-type: none"> <li>- Call centres operated by Allianz Partners locally and through our offshore providers in Allianz Services India and AWP Services Thailand.</li> <li>- In store (agent operated)</li> <li>- Online via public websites</li> <li>- OSHC direct by Allianz Partners on-campus staff</li> <li>- Directly with corporate clients</li> </ul>
<b>Business partners (External)</b>	<ul style="list-style-type: none"> <li>- Agencies and brokers for travel insurance</li> <li>- Financial institution partners</li> <li>- Automotive manufacturers</li> <li>- Government – Department of Veterans' Affairs</li> </ul>
<b>Networks</b>	<ul style="list-style-type: none"> <li>- Home assistance maintenance &amp; service providers</li> <li>- Home assistance product support</li> <li>- Medical and allied health services</li> <li>- Personal assistance services</li> <li>- Roadside assistance &amp; battery supply</li> <li>- Vehicle tow services</li> </ul>
<b>Claims Handling</b>	<ul style="list-style-type: none"> <li>- Assessment tools – software</li> <li>- Claims handling for overseas student health cover provided in Australia (in-house)</li> <li>- Claims handling for overseas visitor health cover provided in Australia by Peoplecare Health Limited</li> <li>- Claims handling for travel insurance claims provided in Australia (in-house)</li> <li>- Claims handling for minor travel insurance claims provided offshore by AWP Services Thailand</li> <li>- Data management</li> <li>- Secure document management</li> </ul>
<b>Customer Service</b>	<ul style="list-style-type: none"> <li>- Call centres located nationally (in-house)</li> <li>- Call centres - International (outsourced to Allianz Services India and AWP Services Thailand)</li> </ul>

## Corporate Support

Key Operations: <i>These key operations support the distribution of Allianz Partners products</i>	Supply Chains: <i>N.B. goods and service providers detailed below are located in Australia unless specified otherwise.</i>
<b>Facilities</b>	<ul style="list-style-type: none"> <li>- Building facilities management</li> <li>- Cleaning</li> <li>- Leased properties in Australia</li> <li>- Maintenance services</li> <li>- Post and courier</li> <li>- Products and stationery (coffee &amp; office suppliers)</li> </ul>
<b>Finance</b>	<ul style="list-style-type: none"> <li>- Onsite support services</li> <li>- Offshore operational support (Allianz Partners India)</li> <li>- Banking and finance partners</li> </ul>
<b>Information technology</b>	<ul style="list-style-type: none"> <li>- Operational support</li> <li>- Infrastructure Technology (owned by Allianz Partners and Allianz Technology)</li> <li>- Hardware</li> <li>- Software</li> <li>- IT Consultants</li> </ul>
<b>Market management</b>	<ul style="list-style-type: none"> <li>- Media channels (all forms)</li> <li>- Marketing support services</li> <li>- Print and promotional merchandise</li> <li>- Public relations</li> <li>- Sponsored &amp; Internal events</li> <li>- Websites – hosted and white label</li> </ul>
<b>People &amp; Culture</b>	<ul style="list-style-type: none"> <li>- Employee assistance</li> <li>- Labour Hire</li> <li>- Learning and development</li> <li>- Recruitment services</li> <li>- Training materials</li> <li>- Workplace health &amp; safety</li> </ul>

**Corporate Support cont.**

Key Operations: <i>These key operations support the distribution of Allianz Partners products</i>	Supply Chains: <i>N.B. goods and service providers detailed below are located in Australia unless specified otherwise.</i>
<b>Project Management</b>	<ul style="list-style-type: none"> <li>- Project consultants</li> <li>- Systems and processes</li> </ul>
<b>Procurement</b>	<ul style="list-style-type: none"> <li>- Consulting services</li> <li>- Outsourced services</li> <li>- Rental fleet management</li> <li>- Travel</li> </ul>
<b>Risk and Compliance, Internal Audit</b>	<ul style="list-style-type: none"> <li>- Insurance</li> <li>- Systems and tools</li> <li>- Training</li> </ul>

## STRUCTURE, OPERATIONS AND SUPPLY CHAINS

### Employees

- At 31 December 2021, Allianz Partners had a workforce of 498 staff, comprising 417 full time, 66 part time and 13 casual employees and two external directors.
- Our employees located within Australia are subject to Australian workplace laws.
- Our employees are engaged either under contract or enterprise agreements.
- We sometimes use short term employment contracts. For these, we engage professional service firms that provide skilled workers. Short term agreements include relevant clauses covering:
  - o licensing;
  - o qualifications;
  - o health & safety;
  - o local and other regulations; and
  - o modern slavery.
- We do not use recruitment strategies that target specific individuals or groups from marginalised or disadvantaged communities.
- We do not use any child labour.
- We do not engage in the use of seasonal labour.

All employees are provided onboarding training covering employee rights, whistleblowing, compliance, anti-corruption, and Allianz Partners Employee Code of Conduct.

### Assessment of Modern Slavery Risks [Mandatory Criterion 3]

Allianz Partners undertook a thematic modern slavery review of our supply chains in 2021, spanning key categories and suppliers.

Suppliers were screened based on the following modern slavery awareness and criteria:

- 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.

### Assessment of Modern Slavery Risks [Mandatory Criterion 3]

In 2021, Allianz Partners performed more than 200 Risk Assessments on suppliers across all categories of our operations.

### 2021 RISK ASSESSMENTS AND OUTCOMES



The findings of our Supplier Risk Assessments and Deep Dives were as follows:

Category Review	Risk review findings
<b>Roadside</b> <b>Type of modern slavery risk:</b> Sector and Industry risk Product and services Risk Geographic Risk	<p>On Spot repair, towing &amp; rental vehicles</p> <p>Suppliers comply with local, state, and federal regulations and Acts in relation to workplace requirements. The larger providers hold independent guides and policies for employees and business practices.</p> <p>A deep dive review was performed with our provider of automotive batteries. Our provider is aware of modern slavery and the workforce engaged are employed in line with Australian standards.</p> <p>Our provider imports battery materials from overseas and is undertaking additional reviews to provide further insights into the raw materials and manufacturing of automotive batteries.</p>
<b>Home &amp; Lifecare</b> <b>Type of modern slavery risk:</b> Product and Geographic risks	<p>A cross-sectional review of network providers supporting the home &amp; lifecare space was conducted. Locally, providers had in place employee agreements and relevant policies and processes. Where required suppliers had relevant industry licenses.</p> <p>This class of providers operate within highly regulated environments supporting both healthcare and Government agencies.</p> <p>The key providers supporting the provision of healthcare equipment have modern slavery programs in place. Allianz Partners is working with key providers to attain further transparency within their respective supply chains.</p>
<b>Specialty Support Services</b> <b>Type of modern slavery risk:</b> Product and services risk	<p>Key providers supporting this classification reviewed.</p> <p>This category is highly regulated through the healthcare and education sectors. Providers were regulated and licensed through industry bodies or government agencies such as APRA.</p> <p>Key providers have provided relevant documentation including modern slavery action plans or completed Allianz Partners modern slavery attestations.</p> <p>A review of medical providers and direct billing medical practices for our OSHC and OVHC members will be completed by December 2022. The review will incorporate agreement variations to include modern slavery obligations.</p> <p>Where Allianz Partners has engaged offshore human resource services, these services are provided by Allianz business units.</p> <p>All Allianz business units are subject to the Allianz Code of Conduct, which provides a range a safety and security measures protecting employee rights and conditions.</p>

Category Review	Risk review findings
<b>Professional Services</b> <b>Type of modern slavery risk:</b> Product and services risk	<p>Providers within this category are engaged based on reputational experience. Their employees are engaged in accordance with Australian employment standards. No concerns identified</p>
<b>Human Resourcing</b> <b>Type of modern slavery risk:</b>	<p>The category is highly engaged and experienced. Providers have experience with modern slavery. No concerns identified.</p>
<b>Facilities and Building</b> <b>Type of modern slavery risk:</b> Sector and Industry risk Product and services risk Geographic risk	<p>Given the possible exposure to modern slavery risks, a larger proportion of providers within this category were risk reviewed, with providers giving modern slavery attestations.</p> <p>We performed a deep dive on our cleaning contractor due to the nature of the industry. The review was included as part of our vendor annual review. No concerns were identified. Employees with this provider are paid in accordance with award standards. Our provider is aware of their obligations and provides suitable training and support to its employees.</p>
<b>Marketing Print and Advertising</b> <b>Type of modern slavery risk:</b> Product and service risk Geographic risk	<p>Given the nature of this category, which includes imported materials from print to promotional material, a larger category review was undertaken.</p> <p>No concerns were identified with Allianz Partners using reputable providers servicing highly regulated industries including Government, banking and insurance and healthcare.</p> <p>Our providers had high visibility of their supply chains, and many having undertaken their own modern slavery risk reviews.</p>
<b>Office Support</b> <b>Type of modern slavery risk:</b> Product and services risk Geographic risk	<p>A large sample of the providers within this category were reviewed under Allianz Partners modern slavery risk assessment.</p> <p>Allianz Partners uses prominent providers within these support areas who are supported by our modern slavery assessment processes or conduct their own modern slavery supply chain assessments.</p> <p>Key areas of product risk within this category are IT equipment and support.</p> <p>Allianz Partners uses an internal Allianz BU for IT services with the actions toward modern slavery captured within their modern slavery statement:  <a href="https://modernslaveryregister.gov.au/statements/4287/">https://modernslaveryregister.gov.au/statements/4287/</a></p> <p>A key IT equipment provider within this supply chain sources equipment from overseas markets where modern slavery is a geographical risk. This key source provider shared their detailed modern slavery action statement which includes works undertaken to identify any potential modern slavery risks.</p>



## Actions to assess and address modern slavery risks [Mandatory Criterion 4]

### Due Diligence and Modern Slavery

Allianz Partners uses a diverse range of suppliers within Australia and globally. Our sourcing approach involves a pre-screening due diligence process known internally as VISP (Vendor Integrity Screening Process). This control incorporates a range of key searches and attestations made by providers in relation to anti-corruption, anti-bribery, modern slavery, and adherence to the Allianz Vendor Code of Conduct.

### Allianz Vendor Code of Conduct

Allianz Partners places significant importance on trust as a pillar of our business. To protect this trust, our partners, suppliers and providers are asked to accept the Allianz Vendor Code of Conduct which includes principles for economically, socially, and environmentally sound business practices.

### Agreements

Providers who pass through the Allianz due diligence stage and accept the Vendor Code of Conduct and the expectations of Allianz Partners are then contracted, the vast majority being contracted under Allianz Partners template agreements. Allianz Partners template agreements and, where utilised, provider agreements, include clauses covering adherence to Australian laws including modern slavery.

**Key actions undertaken in 2021 to continuously improve Allianz Partners' approach to identifying and mitigating modern slavery risks include:**

Action	Description	Achievement
<b>Modern Slavery Risk Assessments</b>	Perform risk assessments spanning all vendor categories.	In excess of 200 modern slavery risk reviews were actioned across all categories in 2021. Deep dives performed for higher risk categories.
<b>Detailed investigation for high-risk categories</b>	Undertake detailed scoping exercise for categories or providers identified as having high-risk exposure due to the product, geographic region or services provided.	Deep dives as outlined above were performed on high-risk categories including IT equipment, cleaning and certain product categories sourced overseas.
<b>Modern slavery incorporated within vendor reviews</b>	Include modern slavery within vendor review meetings to ensure transparency.	Supplier management framework documentation updated, incorporating modern slavery within due diligence onboarding, risk reviews and vendor reviews.
<b>Modern slavery incorporated for all vendor on-boarding</b>	Incorporate modern slavery as part of the sourcing and vendor due diligence process.	Documents and processes embedded within the vendor due diligence and sourcing processes updated to incorporate modern slavery risk reviews.
<b>Align with Allianz Australia on modern slavery training</b>	Leveraging the support of Allianz Australia Insurance limited to develop an appropriate training program.	A modern slavery training program has been developed for Allianz Partners and will be rolled out in 2022.
<b>High-risk categories and vendor reviews</b>	Following the initial assessments conducted for our first modern slavery statement, categories were identified as being from higher risk zones.	Deep dives and further insights were conducted.

## POLICIES AND TEMPLATES

### Allianz Partners modern slavery functional rule

The Allianz Partners modern slavery functional rule supports 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 ensures transparency in the sourcing, vendor due diligence, selection, and on-boarding of vendors within Allianz Partners. The supplier management framework supports the business in the implementation of the procurement policy.

### Vendor Integrity

Allianz Partners expects its suppliers to have similar values to those upheld by Allianz Partners and Allianz Group, as such all new suppliers and providers are vetted through our Vendor Integrity Screening process. This process occurs for all new or varied agreements and is performed every three years for on-going agreements.

### Supplier Contracts

Allianz Partners includes modern slavery clauses within our vendor agreements. The clause requires our providers to notify Allianz Partners where they have any concerns in relation to modern slavery within their supply chains.

### Allianz Partners Vendor Code of Conduct

The Allianz Partners Vendor Code of Conduct requires all potential providers for Allianz Partners to meet the standards expected by Allianz which includes compliance with applicable laws and regulations in the jurisdiction where goods and services are sourced, procured, or performed.

### Modern Slavery Risk Assessment

Allianz Partners perform risk assessments across the breadth of our supply chain based on materiality risk and coverage. The risk review provides insights into the maturity of a supplier's due diligence and awareness to modern slavery risks within their own supply chains.

### Reporting Suspicions of Modern Slavery (Grievance Mechanism)

Allianz Partners has confidential and anonymous processes in place for whistleblowing, which have been communicated to all employees. 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 and awareness towards modern slavery within our supply chains. Allianz Partners has developed training in line with Allianz Australia and is scheduled for roll out within Allianz Partners in 2022.

### Risk Mapping and review

Allianz Partners conducted category risk mapping based on factors including materiality, geographical and industry perceived risk exposure. Allianz Partners undertook deep dives for providers with a perceived risk to modern slavery.

### Remediation Process

Allianz Partners assesses potential modern slavery risks within its supply chains through risk reviews and deep dives. If an incident is reported or a concern raised, Allianz Partners undertakes its modern risk review process.

Assessing our controls and actions [Mandatory criterion 5]

Control	Action	Measurement
<b>Governance</b>	Executive Committee & Board oversight	Monthly status reporting - key indicator reporting provided through to Executive Committee  Vendor Reviews & modern slavery clause inclusion within agreements
	Contracts updated to incorporate modern slavery requirements	Risk appetite statement metric reports monthly on the number of contracts including modern slavery clauses as a % of total
	Policies	Procurement policy & modern slavery policy  Reviewed and updated in line with business & group document management controls
	Training on modern slavery awareness	Developed with Allianz Australia to be rolled out in 2022  Will be measured through risk appetite statement metric reporting % of required staff having completed training
	Vendor contracting and controls	Compliance conducts quarterly vendor screening reviews
<b>Risk Management</b>	Vendor on-boarding	Provider due diligence on new agreement, variation, or every 3 years in line with policies.  Providers attest to meeting the Allianz Vendor code of conduct
	Contract approval process	Compliance approve/review agreements check VISP process and inclusion of modern slavery clauses
	Modern slavery risk reviews	Performance of modern slavery risk assessments based on materiality and cross functional / category
	Supplier deep dive assessments	Performed on potential high- risk categories to modern slavery

## IDENTIFIED FUTURE ACTIONS

- Review identified medical providers and direct billers to uplift and incorporate the modern slavery clause within each agreement in line with wider business practice. Scheduled completion December 2022.
- Continue vendor quarterly reviews, include modern slavery and supply chain reviews as an agenda item.
- Follow up with providers to ensure open actions or activities with respect to modern slavery risk assessments are closed out or concerns are raised through appropriate channels.
- Roll out modern slavery training to employees in 2022.
- Expand modern slavery risk assessments to lower tier providers.
- Share appropriate training on modern slavery with providers, suppliers, and supply chains.



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