



**ALLIANZ PARTNERS  
MODERN SLAVERY  
STATEMENT 2023**

We secure your future

# 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 2022.

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:

- 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 the likelihood of 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 2022.

The Allianz Partners Board of Directors approved this statement on 22 June 2023.

Nigel Alexander  
Chair, Allianz Partners Board of Directors  
22 June 2023

# ALLIANZ PARTNERS IS ALIGNED WITH THE ALLIANZ GROUP SUSTAINABLE PROCUREMENT CHARTER

Allianz Partners recognises the key role of the Allianz group of companies (Allianz Group) and our vendors in positively contributing to the social, economic and environmental wellbeing of the communities that we are part of. Allianz Partners is committed to working collaboratively with our vendors in a way that aligns with the standards as set out within the Allianz Group Vendor Code of Conduct and which meet the requirements of our stakeholders.

The Allianz Group Vendor Code of Conduct is complemented by the Allianz Sustainable Procurement Charter, which sets out Allianz's sustainability objectives including identifying and removing modern slavery and protecting and upholding human rights from vendors' business and supply chains.

## Allianz Partners' commitments

Allianz Partners is committed to:

- lawful, ethical and sustainable business practices;
- upholding human rights;
- the highest workplace standards; and
- prevent or minimise environmental risks/adverse impacts and reducing vendor emissions.

## Vendor requirements

Allianz Partners expects its vendors to:

- comply with all applicable rules, laws, regulations, codes and ethical standards of the countries in which they operate or where they provide goods or services to Allianz Partners;
- continually review and comply with the Allianz Group Vendor Code of Conduct;

- communicate the Allianz Group Vendor Code of Conduct with their employees and supply chains;
- implement a training concept and monitor their staff, subcontractors and agents for compliance with the Allianz Group Vendor Code of Conduct and any applicable laws and regulations;
- notify Allianz Partners of any breaches of the Allianz Group Vendor Code of Conduct by the vendor or its subcontractors; and
- remediate and prevent the recurrence of any breaches.



# MODERN SLAVERY MANDATORY REPORTING REQUIREMENTS

1	Identify the reporting entity
2	Describe the reporting entity's structure, operations and supply chains
3	Describe the risks of modern slavery practices in the operations and supply chains of the reporting entity
4	Describe the actions taken by the reporting entity to assess and address those risks, including due diligence and remediation processes
5	Describe how the reporting entity assesses the effectiveness of such actions
6	Describe the process of consultation with any entities the reporting entity owns or controls
7	Any other relevant information that the reporting entity considers relevant

## Reporting Entity

### [Mandatory Criterion 1]

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 [Mandatory Criterion 2]

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 (among other things):
  - provide general financial product advice for general insurance products;
  - 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

- provide a claims handling settling service, 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:

- Nigel Alexander, Chair and Independent Non-Executive Director
- Damien Ladous, Executive Director and Allianz Partners Global CEO Travel
- Gary Townsend, Non-Executive Director
- Vinay Surana, Executive Director and APAC regional CEO.

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 Australia, who is supported by the Executive Committee (ExCo). ExCo has been established as an internal management committee by the CEO Australia 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 Australia and Board to make decisions which advance the interests of Allianz Partners and its stakeholders.

## Employees

As at December 2022, Allianz Partners had a workforce of 488 staff, comprising 409 full time, 69 part time and 10 casual employees.

Specifically:

- 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:
  - labour hire and licensing requirements;

- skills and qualifications;
- health and safety obligations;
- local and other regulations; and
- modern slavery;

- we do not use any child labour; and
- we do not engage in the use of seasonal labour.

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

## 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.

## Business Operations and Supply Chains

<b>Key Operations</b> These key operations support the distribution of Allianz Partners products and services and processing of any associated	<b>Supply Chains</b> N.B. goods and service providers detailed below are located in Australia unless specified otherwise.
<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> <li>• Education provider partners</li> <li>• Utility partners</li> </ul>
<b>Networks</b>	<ul style="list-style-type: none"> <li>• Home assistance maintenance and service providers</li> <li>• Home assistance product support</li> <li>• Medical and allied health services</li> <li>• Personal assistance services</li> <li>• Roadside assistance and 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 services</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>

## Insurance products and assistance services

Allianz Partners is responsible for developing general insurance and private health insurance products, assistance services, and determining target markets and economic models for distribution of those products 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 via overseas student health cover (OSHC) and overseas visitor 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; and
- travel insurance for banking clients, travel agents and direct to public through Allianz Australia Insurance Limited and through our Worldcare brand.

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 claims handling services to other insurers and corporations as follows:

- third party claims administration and medical repatriation services for related parties (i.e. other Allianz operating entities 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; and
- external network provider management including roadside assistance, medical equipment and travel repatriation.

## Corporate Support

Key Operations These key operations support the corporate functions of Allianz	Supply Chains N.B. goods and service providers detailed below are located within Australia unless specified otherwise.
<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 and 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 and managed by Allianz Technology)</li> <li>• Hardware</li> <li>• Software</li> <li>• IT consultants</li> </ul> <p>All IT related services are outsourced to Allianz Technology (refer to Allianz Technology Modern Slavery Statement 8906 on the Modern Slavery Register)</p>
<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 and internal events</li> <li>• Websites – hosted and white label</li> </ul>
<b>People and 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 and safety and advisory services</li> </ul>
<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>Legal, risk and compliance, internal audit</b>	<ul style="list-style-type: none"> <li>• External legal advice</li> <li>• Insurance</li> <li>• Systems and tools</li> <li>• Training</li> </ul>

## Assessment of Modern Slavery Risks

Allianz Partners manages modern slavery risks by:

- conducting vendor integrity screening on new vendor on-boarding and every three years since an agreement is made;
- including the Allianz Group Vendor Code of Conduct as a requirement of the on-boarding process where providers must agree to uphold our principles; and
- including the standard Allianz Partners modern slavery clauses in vendor agreements, under which vendors must notify Allianz Partners of any non-compliance.

The following statistics provide an oversight of the activities occurring within the calendar year 2022:

### Risk due diligence and controls actioned in 2022



Suppliers are 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;
- can meet relevant standards;
- has an employee retention and remuneration process; and
- has training or awareness in respect to modern slavery.

## Category Reviews

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 and rental vehicles.</p> <p>Suppliers comply with local, state, and federal legislation 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>
<b>Home and Lifecare</b> <b>Type of modern slavery risk:</b> Product and Geographic risks	<p>A cross-sectional review of network providers supporting the home and lifecare space was conducted. Locally, providers had in place employee agreements and relevant policies and processes. Where required suppliers had relevant industry licences.</p> <p>This class of providers operate within highly regulated environments supporting both healthcare and Government agencies.</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 covers our healthcare sector ‘professional services’ covering our medical providers contracted to provide services to our members. This healthcare sector is regulated by Aphra.</p> <p>Within this category our key providers completed relevant documents including modern slavery action plans or submitted Allianz Partners modern slavery attestations.</p>
<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.</p>
<b>Human Resourcing</b> <b>Type of modern slavery risk:</b>	<p>The category is highly engaged, experienced and demonstrated an awareness to Modern Slavery issues and risks with sufficient programs in place to avoid these risks.</p>
<b>Facilities and Building</b> <b>Type of modern slavery risk:</b> Sector and Industry risk Product and services risk Geographic risk	<p>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> <p>Other network cleaning providers are used for the provision of home and lifecare services, with these providers being on-boarded through the vendor integrity screening processes.</p>

Category Review	Risk review findings
<b>Marketing Print and Advertising</b> <b>Type of modern slavery risk:</b> Product and service risk Geographic risk	<p>Our providers have a high visibility of their supply chains, having undertaken their own modern slavery risk reviews. Our partners also support banking and government clients and undertake a range of internal reviews to have a clear knowledge of their supply chains.</p>
<b>Office Support</b> <b>Type of modern slavery risk:</b> Product and services risk Geographic risk	<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>Allianz Technology provides IT equipment and services to Allianz Partners. Refer to Allianz Technology’s Modern Slavery Published statement 8902 available on the Modern Slavery Register for further details.</p>

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

Key controls and enhancements in 2022

### 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 Group Vendor Code of Conduct.

### Allianz Group Vendor Code of Conduct

Allianz Partners places a significant degree of importance on trust as a pillar of our business. To protect this trust, our partners, vendors and providers are required to accept and acknowledge the Allianz Group Vendor Code of Conduct which includes principles for economically, socially, and environmentally sound business practices. The Allianz Group Vendor Code of Conduct is based on national laws and regulations as well as international conventions.

### Agreements

Providers who complete the Allianz Partners due diligence stage and agree to the Allianz Group Vendor Code of Conduct are contracted, with the majority being contracted under an Allianz Partners template agreement. Our agreements include clauses that require the vendor to comply with Australian laws, including modern slavery laws. Our standard modern slavery clause includes a requirement that vendors must notify Allianz Partners if they identify any exposures to modern slavery risks in their operations or supply chains.

### Training and Education

Launched in July 2022, the Allianz Modern Slavery employee training program provides information to all Allianz Partners employees about:

- what is modern slavery; and
- what actions Allianz Partners is taking to address modern slavery risks within our supply chains.

The training explains the following terms:

- Slavery
- Servitude
- Forced labour
- Human trafficking
- Forced marriage
- Debt bondage
- Worst forms of child labour
- Deceptive recruitment for labour or services

The training also highlights the industries with greater exposure to modern slavery risks and provides relatable examples and news articles detailing where and how modern slavery has been identified and perpetrators held accountable.

The training was developed for all Australian Allianz employees. The objective of the training is to make employees aware of the risks of modern slavery in our operations and supply chains and to understand the actions Allianz Partners is taking to minimise those risks and how employees can raise concerns for review or escalation.

The training program includes:

- an overview of Allianz Partners' obligations under the Modern Slavery Act;
- a summary of the mandatory reporting criteria; and
- a short quiz to confirm the employee's understanding of modern slavery.

### Training particulars of 2022

<b>Training deployed</b>	All Allianz Partners employees
<b>Deployed date</b>	July 2022
<b>Timeframe for new and existing employees to complete Modern Slavery training</b>	6 Months
<b>Allianz Partners employees completed modern slavery training YTD</b>	452

## 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 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 held by Allianz Partners. 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 in our vendor agreements. The clause requires vendors to notify Allianz Partners if they have any modern slavery risks within their supply chains.

### Allianz Group Vendor Code of Conduct

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

### 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 case 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:

[www.allianzpartners.com.au](http://www.allianzpartners.com.au).

### 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 the effectiveness of 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 and modern slavery clause included in agreements
	Agreements updated to include modern slavery requirements	Risk appetite statement metric reports monthly on the number of contracts including modern slavery clause as a percentage of total
	Policies	Procurement policy and modern slavery policy reviewed and updated in line with business and Allianz Group document management controls
	Training on modern slavery awareness	Developed with Allianz Australia Insurance Limited and deployed in 2022
	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 Group 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

### Consultation with owned or controlled entities [Mandatory criterion 6]

Allianz Partners does not own or control any entities.

### Any other information [Mandatory criterion 7]

Identified actions for future reporting periods include:

- vendor annual reviews, including modern slavery within the agenda; and
- enhance awareness of modern slavery within our suppliers' networks and supply chains.



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