

# Crawford & Company (Australia) Pty Ltd Modern Slavery and Human Trafficking Statement 2023

This Modern Slavery Statement (“Statement”) is made under the Australian Modern Slavery Act 2018 (Cth) (“MSA”) and sets out the actions taken by the Crawford & Company Australia Pty Ltd to assess and address modern slavery risks in our operations and supply chains during the year ended 30 June 2023 (“FY23”).

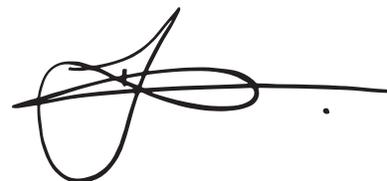
**Crawford & Company Australia Pty Ltd (“Crawford” or “Crawford Australia”) is an Australian private company (ABN 11 002 317 133), registered at Level 3, 324 St Kilda Road Southbank VIC, Australia.**

This Statement is Crawford’s fourth Statement and is a joint Statement on behalf of Crawford and its controlled entities. This includes reporting entities which are wholly owned subsidiaries, as well as other entities over which Crawford has control of. A list of the reporting entities covered by this Statement, and other controlled entities that do not meet the threshold for reporting entities, is provided in Appendix 1. The information set out in this Statement is provided as a consolidated description for Crawford. In this Statement reference to ‘Crawford’, ‘Crawford Australia’, ‘we’, ‘us’ and ‘our’ is to the identified entities set out in Appendix 1.

Prior to Board approval, this Statement was reviewed by Crawford’s group AVP Global Compliance Office (Asia Pacific) and Chief Ethics Officer. It was subsequently

endorsed by the Crawford Australia President and Australian Executive Committee. Additional information about consultation with reporting entities and other owned and controlled entities is set out in this Statement.

This Statement was approved by the Crawford & Company (Australia) Pty Ltd Board on behalf of all reporting entities (acting as a higher entity under section 14(2)(d)(ii) of the Australian MSA) on 9 August 2023 and is signed by the President (Australia) and a Director of the Crawford & Company (Australia) Pty Ltd Board.



Tim Jarman, President (Australia) & Director  
9 August 2023



# Introduction

Crawford Australia was established in 1987 and now has a network of 46 offices and more than 500 claims insurance claims service and other specialist insurance professionals, throughout Australia. Despite our broad footprint and the challenge of addressing modern slavery beyond our first-tier suppliers, we are dedicated to improving our efforts to combat it. We work with regulators, businesses, and civil society to meet our ethical obligations.

Integrity is central to Crawford, as we prioritise restoring lives and communities. We uphold ethical standards and legal compliance in our supply chain through our global Code of Business Conduct and Ethics. Our commitment to respecting and supporting human rights is ingrained at all levels of our organisation.

This Statement outlines our actions in managing modern slavery risks globally in FY22. It highlights our steps, achievements, and areas for future work. While focusing on modern slavery risks, we also acknowledge our responsibility to respect all internationally recognised human rights, as stated in our global Code of Business Conduct and Ethics and our Anti-Slavery Policies.

## Key areas of action in 2022-2023



Throughout 2022 our Third-Party Risk Management team have worked closely with our Procurement team to revise and implement improved policies and procedures with respect to both Third-Party Risk Management and Procurement.



By standardising our engagements with third-parties, vendors, and suppliers throughout the due diligence, onboarding, and offboarding process we are ensuring that we retain complete oversight of the businesses we are doing business with.



Maintaining a focus on the people we are doing business with, ensures that those businesses we chose to do business with will meet the expectations of Crawford, not just in terms of performance and regulatory obligations but also in social initiatives.

# How does our 2023 Statement build on our 2022 Statement?

This statement demonstrates a significant step forward for Crawford both in the detail of our supporting processes and a more transparent way of demonstrating our commitment to anti-slavery. This statement outlines our progress to date and some of the key actions taken to address modern slavery.

## Progress against our objectives



Leveraging Crawford’s global footprint to identify gaps and opportunities to strengthen our ability to address modern slavery risks.



Improved procedures for onboarding suppliers as part of our supply chain including the implementation of a single platform for vendor/supplier management.



Commitment to being a responsible corporate citizen including investment in procurement and third-party risk management resourcing and systems.



Providing bespoke training to build capacity and awareness for staff.

## Structure and operations

Crawford is headquartered in Melbourne and is a private company that is ultimately wholly owned by Crawford & Company, a United States based company headquartered in Atlanta, Georgia USA and listed on the NYSE under symbols CRD-A and CRD-B.

Crawford in Australia is comprised of four primary operating segments which work together as an integrated portfolio to create our ‘One-Crawford’ offering. Crawford’s main business is providing insurance claims solutions for insurance brokers, insurance carriers, and self-insured entities. We have offices in all states and territories and a diverse range of roles, functions, and staff in each office.

### Operation

### Overview

#### Loss Adjusting

Crawford’s loss adjusters work on behalf of insurers to investigate cause and circumstance, following lodgement of an insurance claim, and assess the correct sum to be paid or ascertain what repairs are necessary.

### Brands

- Crawford
- Global Technical Services (GTS)
- Crawford Forensic Accounting Services (CFAS)
- CRD Building Consultants and Engineers



Building Consultants & Engineers

#### Legal Services

Crawford’s wholly owned law firm HBA Legal is made up of defendant insurance law specialists working across casualty, professional indemnity, public liability, cyber risk, workers’ compensation, workplace health & safety, employment law, motor injury, health law and more.

- Crawford Legal Services
- HBA Legal

**Crawford** Legal Services

## Operation

## Overview

## Brands

### Platforms and Networks

Contractor Connection is one of the largest networks of trades professionals in Australia, providing repairs and restoration services to insurance policyholders, on behalf of insurers.

- Crawford Contractor Connection
- WeGoLook



### Third Party Administration

Crawford TPA is a full end-to-end outsourcing claims management solution largely servicing insurers, self-insured clients, and large corporates when claims are made against them.

- Crawford TPA



# Our purpose and values

For over 80 years, these principles have been embedded in Crawford's global culture, shaping the company's ongoing commitment to putting people first and delivering the highest quality service for its customers. Taking action to manage our modern slavery risks align to our values and ensuring that we maintain a culture that practices integrity and ethical behaviour.



**Our Purpose** - Restoring and enhancing lives, businesses, and communities.

**Our Values** - Our purpose is embedded in our values – to **RESTORE** is part of everything we do.

## Our workforce

Our workforce consists of more than 500 full time equivalent employees, who are all employed directly by Crawford and in accordance with relevant national employment legislation. Over 91.75% are operational roles, with the remaining employees providing support services such as finance, human resources, information technology, and legal and compliance.

Operation	Number of Employees (Headcount)	Full time %
Loss Adjusting	526	95.25%
Legal Services	98	62.20%*
Platforms and Networks	31	93.50%
Third Party Administration	28	93.50%
Other	54	98.15%

\*The above data is presented as a rounded approximation

## Our clients

Our clients are predominantly related to the insurance industry, encompassing insurance carriers, insurance brokers, and self-insured entities, and corporate entities. This specialised focus allows us to deeply understand the unique challenges and complexities faced by our clients in the insurance sector. We work closely with insurance carriers to provide end-to-end claims management solutions. Our expertise in the insurance industry enables us to provide strategic guidance, innovative solutions, and reliable support to our clients.

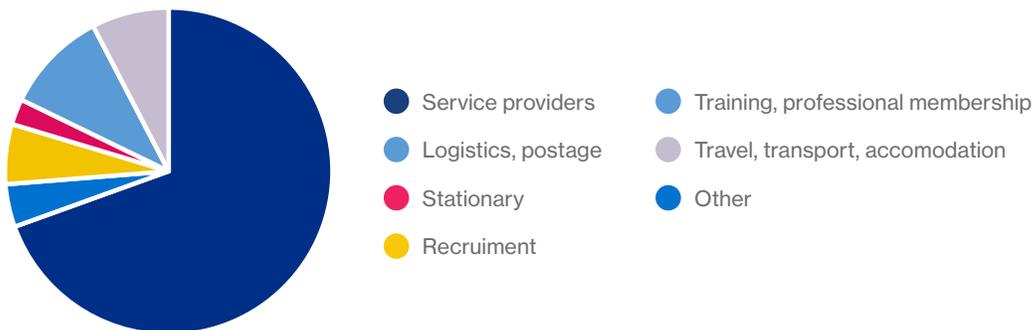
Operation	Percentage of Australian Clients*	Percentage of International Clients*
Loss Adjusting	80%	20%
Legal Services	91%	9%
Platforms and Networks	100%	0%
Third Party Administration	60%	40%

\*The above data is presented as a rounded approximation

## Our supply chain

Our supply chain encompasses a wide range of suppliers, primarily consisting of service providers who contribute to our operations. These service providers play a vital role in supporting our business functions and delivering quality services to our clients. In addition to service providers, our supply chain includes recruitment partners who assist us in sourcing qualified talent, training providers who help enhance our employees' skills and knowledge, and professional memberships that enable us to access valuable industry resources and networks. We also engage suppliers for stationary supplies, travel arrangements, transportation, accommodation services, as well as logistics and postage solutions to meet our operational needs. By maintaining strong relationships with our diverse range of suppliers, we ensure the smooth functioning of our business and deliver value to our customers.

We have commenced efforts to transition our supply chain into our third-party vendor tool to ensure that all suppliers are appropriately screened prior to working with Crawford – and where these suppliers are deemed a suitable provider; their onboarding and offboarding.



## Risks of modern slavery practices in our operations and supply chains

Modern slavery poses significant risks within the operations and supply chain, the complexity and global nature of these organisations often involve intricate networks of suppliers and subcontractors, making it challenging to ensure full visibility and control over labour practices. This lack of transparency increases the vulnerability to modern slavery, as unscrupulous actors can exploit gaps in oversight. In addition, the demand for cost-effective services and rapid delivery timelines may lead to pressure on suppliers to cut costs, potentially resulting in the use of forced or bonded labour.

Given these risks, Crawford have implemented robust due diligence processes which include supplier screening, audit, and the establishment of policies and procedures, to identify and address any instances of modern slavery within their operations and supply chain.

## Actions taken to assess, and address identified modern slavery risks

### Assemble

- Ensure appropriate resources and processes in place to support our third party and vendor screening processes.
- Empower the workforce to report any behaviours of concern.

### Assess

- Evaluate current process for measurement, disclosure, and reporting

Identify gaps through a variety of lenses (people, process, systems, and technology)

### Aspire

- Identify and engage stakeholders to better identify suppliers beyond line-one vendors
- Define and operationalise cross functional vendor screenings.

### Aware

- Keeping the Board and leadership informed of regulatory changes
- Ensuring all staff are aware of our anti-slavery policy, third-party risk management policy and procurement due diligence procedures.

### Act

- Build processes and capabilities to deliver on the strategy
- Partner with best-in class vendors for market-based data, indicators for reporting, disclosure, and advice
- Embed actions and measure performance



## Assessing the effectiveness of our actions

We recognise the importance of assessing the effectiveness of the actions we have in place to build on and improve our actions to address modern slavery risks in our supply chain. We have taken proactive measures to assess, and address identified modern slavery risks within our operations. One crucial step has been the revision of our third-party risk management policy and associated due diligence processes. By strengthening these protocols, we have enhanced our ability to identify and mitigate any potential risks related to modern slavery within our supply chains. Additionally, we have implemented a newly developed procurement policy and procedure that embeds anti-modern slavery principles. This policy ensures that ethical considerations, including the prevention of modern slavery, are integrated into our procurement practices. Through these actions, we are demonstrating our commitment to combatting modern slavery and promoting responsible business practices throughout our organisation.



## Consultation with reporting entities and owned or controlled entities

In accordance with s.16.1 (f) of the Modern Slavery Act (Commonwealth) 2018, Crawford has an obligation to consult with owned or controlled entities which are listed in Appendix 1. This Statement was developed through a group consultation process and each of these entities are involved on an ongoing basis in the activities involved in the prevention and active monitoring of our anti-slavery risk management approach.

### Consultation process

Crawford's legal and compliance department lead (among other things) the Crawford group ethics, compliance, risk management, and third-party risk management functions. This includes Crawford's vendor/supplier due diligence processes.

The legal and compliance team are responsible for engaging and consulting with all entities within the Crawford group and this Statement is no exception. This consultation process involves key individuals and teams that work together to identify, mitigate, and manage potential modern slavery risk in our operations and supply chains including (beyond the legal and compliance department) our finance, procurement, and human resources functions all of whom contributed into this Statement. This consultation helped to ensure that our Statement reflects our group approach to modern slavery and continued engagement with key internal stakeholders with respect to modern slavery.

The Statement was reviewed by the AVP of Global Compliance for the Asia Pacific region, Crawford & Company's group Chief Ethics Officer, and endorsed by the Australia President and Australian Executive Committee before being reviewed and approved by the Crawford Australia Board.

# Appendix 1: List of reporting entities and owned or controlled entities

- Crawford & Company (Australia) Pty Ltd
- Broadspire (Australia) Pty Ltd
- HBA Legal Pty Limited
- Paratus Claims Pty Limited
- Pillion Pty Limited
- WeGoLook AUS Pty Ltd

<sup>1</sup>These entities are reporting entities for the purposes of the Australian Modern Slavery Act.

<sup>2</sup>This entity is not a reporting entity for the purposes of the Modern Slavery Act but have been included in this list in the interest of transparency.

<sup>3</sup>This entity is not a reporting entity for the purposes of the Modern Slavery Act but have been included in this list in the interest of transparency.

<sup>4</sup>This entity is not a reporting entity for the purposes of the Modern Slavery Act but have been included in this list in the interest of transparency.

<sup>5</sup>This entity is not a reporting entity for the purposes of the Modern Slavery Act but have been included in this list in the interest of transparency.

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