

Modern Slavery Statement

This Modern Slavery Statement (**Statement**) is made in accordance with the requirements imposed by the *Modern Slavery Act 2018* (Cth) (**Modern Slavery Act**) and constitutes the Statement for Redion Insurance Pty Ltd (ACN 140 219 594) (**Redion**), formerly known as Europ Assistance Australia Pty Ltd (**EAA**) during the reporting period 1 January 2025 to 31 December 2025 (**Reporting Period**). EAA, as Redion was then known, met the 'annual consolidated revenue' threshold, pursuant to the Modern Slavery Act, during the Reporting Period.

Throughout this Statement, EAA is referred to as "EAA" or "we" or "our" or "us".

This is our first Statement, which outlines the steps we have taken so far to understand and address the modern slavery risks in our operations and global supply chain.

We are committed to assessing and eliminating the risks of modern slavery in our business operations and supply chains.

1. Structure, operations and supply chain

1.1 Structure

The Europ Assistance Group is a division of Generali, which was founded in Italy in 1831. EAA is the entity which is incorporated in Australia. EAA does not own or control any other entities. EAA operates predominantly within Australia with its own employees and suppliers.

EAA began operating in Australia in 2011 and is an insurance administrator. It operates in the travel insurance and assistance market.

EAA distributes its products and services directly to consumers in the travel insurance market by trading under the brand names of Insure&Go and Tick Travel Insurance.

EAA operates through authorised representatives, including Flight Centre Travel Group and AllClear Travel Insurance, who are responsible for the distribution and servicing of products under EAA's licence.

1.2 Operations

In Australia at the end of the Reporting Period, EAA:

- has 200 employees including 192 full-time and 11 part-time employees;
- does not employ any casual employees;
- has 4 contractors engaged;
- does not employ persons under 18 years of age; and
- has 26 employees within its organisation on visa arrangements.

EAA's workforce spans across New South Wales, Queensland, Victoria, South Australia and Western Australia. EAA has two corporate offices located in Sydney, New South Wales and Brisbane, Queensland, where the main proportion of its workforce operates from. Workers who are based outside of New South Wales and Queensland are fully remote and perform their work duties or services from home.

The terms of employment of all EAA employees are governed by the *Fair Work Act 2009* (Cth). Some employees are also covered by a modern award, including the Banking, Finance and Insurance Award 2020 and the Nurses Award 2020.

For employees with visa arrangements, EAA carries out a VEVO check through its Human Resources system, Employment Hero, during the onboarding process, to ensure that employees will be working in compliance with any visa conditions.

EAA is committed to maintaining the highest standards of ethics and integrity in its business operations and dealings. EAA opposes modern slavery in all its forms, including forced labour, human trafficking, debt bondage, and exploitation.

EAA will continue to work to prevent and address any risk of modern slavery within its supply chains and throughout its operations, holding itself accountable by engaging in improvement activities in the next reporting period.

1.3 Supply Chain

Approach to supplier selection

The suppliers with whom EAA does business must deliver products in a manner that does not compromise EAA's ethical standards.

Most of EAA's supply chain are existing suppliers of the Europ Assistance Group, meaning that considerable due diligence has already been completed before and after suppliers are engaged by EAA.

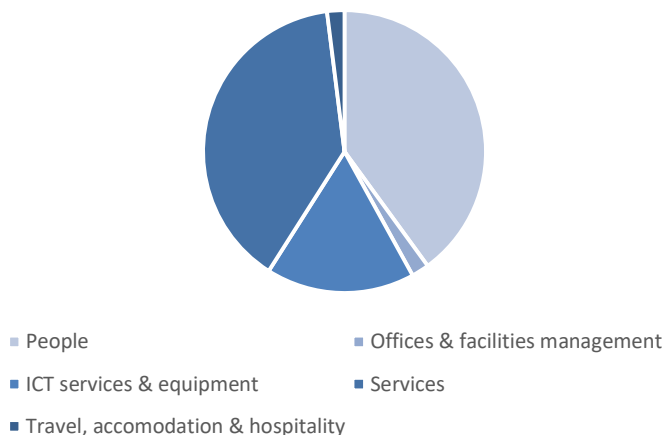
The majority of EAA's vendors are from low-risk regions. In light of this, the risk EAA has caused or contributed to modern slavery in its supply chain during the Reporting Period is rated as low. Nonetheless, addressing and further mitigating the risks of modern slavery in EAA's supply chain is the focus of its activities in the year following the Reporting Period.

Supply chain categories

Given the nature of EAA's business, as an insurance administrator, our main procurement spend relates to the employment and engagement of our people. Following this, our procurement spend is largely focused on products and services in various functional areas to support our people in the provision of our services.

A breakdown of EAA's supply chain categories has been provided in the chart and table below.

Supply Chain Breakdown (2025)



Category	Description of Supply	Portion of Supply Chain
People	The remuneration paid to our people is the largest expense in our supply chain.	40% of spend
Offices and facilities management	The commercial office spaces we lease from commercial landlords including fit out costs, maintenance, utilities, cleaning and security.	2% of spend
Information and communication technology (ICT) services and equipment	The systems, software and equipment that are necessary to maintain the technology infrastructure that supports our business, including both hardware and software.	17% of spend
Services (including professional services)	The services we acquire from external providers including trade services, legal services, finance services, consultants and recruitment services.	39% of spend
Travel, accommodation and hospitality	The service providers we use to organise, book and facilitate our travel and accommodation requirements, including meals and other hospitality requirements while travelling.	2% of spend
Other	Additional products and services relevant to EAA's business, including financial services and insurance, marketing and merchandise and office stationery.	Included in Services category

2. Our modern slavery risks

While this is our first Statement, we are committed to continuing to assess our modern slavery risks in our operations and supply chains to better understand the risks of causing, contributing to, or directly linked to, modern slavery.

We will continue to use a number of factors to assess the potential risk of modern slavery in our supply chains, including geographic risks from the services we source, the sectors we operate in, and the supply chain model involved. As EAA does not own or control any other entities, consultation in this regard is not applicable.

We acknowledge that there may be a risk that some of our suppliers may source goods and services from international jurisdictions as part of their supply chain, thereby increasing the risk of modern slavery. To mitigate this risk, we aim to prioritise the selection of reputable, locally based suppliers (where available), who have a verifiable commitment to managing modern slavery risk in their business practices and supply chains.

EAA is continually working to understand the risk rating of modern slavery within its supply chain. At present, EAA understands that there is a low risk of modern slavery practices within its supply chain. EAA will continue to undertake thorough assessments of its modern slavery risks, to enable a more comprehensive view to be formed as to the modern slavery risks in its supply chain, in future Statements.

3. Actions taken to address modern slavery

3.1 Operations and Governance

EAA is committed to maintaining the highest levels of integrity and honesty throughout all aspects of our business, and we expect our business partners including suppliers and vendors to respect and adhere to such practices in the operation and management of their businesses.

The Procurement team has overarching responsibility for guiding and monitoring risks of modern slavery. It also has oversight of sustainability and social impact practices, including corporate governance, such as carrying out risk assessments and due diligence procedures which flow through our organisation and supply chains.

Additionally, we have implemented various policies and procedures to ensure a safe working environment for EAA staff and also support the management of modern slavery risk within the organisation, which include the following:

- Modern Slavery Procedure;
- Group Code of Conduct;
- Whistleblower Policy;
- Anti-Bullying, Discrimination and Harassment Procedure;
- Workplace Health and Safety Policy;
- Leave Procedure;
- Leave Monitoring Procedure;
- Remuneration Policy;
- Grievance Handling Procedure;

- Performance & Conduct Accountability Procedure;
- Recruitment & Selection Procedure;
- Flexible & Hybrid Work Procedure;
- Group Travel Management Guideline; and
- Group International Sanctions Policy.

EAA is also subject to the Europ Assistance Holding Group Code of Conduct.

During the onboarding process, EAA's Learning and Development Coordinator carries out mandatory training for new employees, contractors and other staff through a series of training modules, including in relation to:

- Modern Slavery;
- Conflict of Interest and Gifts;
- Whistleblowing;
- Anti-fraud, Bribery and Corruption; and
- any additional training modules as relevant to the employee's position.

3.2 Supply Chains

Any suppliers engaged by EAA at a corporate level (of which there are limited suppliers) will be done so in accordance with relevant policies and procedures, including the Modern Slavery Procedure.

4. Assessing the effectiveness of our actions

EAA is committed to monitoring the effectiveness of our governance structure, including by adopting further relevant policies and procedures to address modern slavery risks in our operations and supply chains, where deemed necessary.

We will assess the effectiveness of our actions by tracking our actions and outcomes, partnering with suppliers, providing training and support to our workers and undertaking internal governance processes. Based on the results of these processes we will adapt and strengthen our actions to improve our response to modern slavery.

The below sections outline a roadmap of actions going forward.

Governance processes

As part of our roadmap for effective prevention of modern slavery in our operations, EAA is committed to reviewing and developing internal processes, to regularly audit and improve actions taken to address modern slavery risks, including regular engagement and feedback within the business, including with the legal, human resources and operations departments.

These internal processes include:

- EAA's procurement team being tasked with assessing modern slavery risks which vests within the responsibility of this business function to implement practices to address any identified risks and encouraging disclosures;
- setting reporting timeframes and deadlines to monitor the implementation of such measures including key targets or performance indicators; and
- assessing the measures taken to mitigate, remediate or eliminate the risk or exposure to modern slavery practices and adapting such processes as applicable.

Suppliers

In respect of suppliers EAA engages with at a corporate level, we will continue to:

- evaluate relationships on an ongoing basis including ensuring suppliers are engaged in a way that accords with the Modern Slavery Procedure; and
- require any suppliers we directly engage with through contractual clauses to be compliant with modern slavery practices and laws of the country in which they operate to prevent risks.

Workers

Employees, contractors and other staff working directly for us or on our behalf will be provided with training and encouraged to report any suspected misconduct or breach of our Modern Slavery Procedure or any other policies and procedures.

On 25 August 2026, this Statement was approved by the Board of Directors of Redion Insurance Pty Ltd and authority was granted to the CEO and Director to sign and submit the Statement to the regulating body.

Justin Sebire

Justin Sebire (Aug 31, 2026 12:04:01 GMT+10)

Justin Sebire
CEO & Director
Redion Insurance Pty Ltd (ACN 140 219 594)
(formerly known as Europ Assistance Australia Pty Ltd)