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CONSOLIDATED

# Modern Slavery Statement 2020



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## Introduction

This Modern Slavery Statement (**Statement**) is a joint statement made on behalf of reporting entities: Claim Central Pty Ltd (ACN 102 685 343) (**CCAU**) and Claim Central Consolidated Pty Ltd (ACN 602 460 953) and its wholly owned subsidiaries excluding CCAU (**CCC**) pursuant to the *Modern Slavery Act 2018* (Cth) (the **Act**) for the financial year ended 30 June 2020.

CCAU is a wholly owned subsidiary of CCC. A formal project was implemented to develop a modern slavery framework and to drive the identification and risk assessment of supply chain and operations across the CCC group, which includes CCAU. Accordingly, references in this statement to CCC incorporate CCAU.

The Board of CCC and CCAU have reviewed and approved this statement.

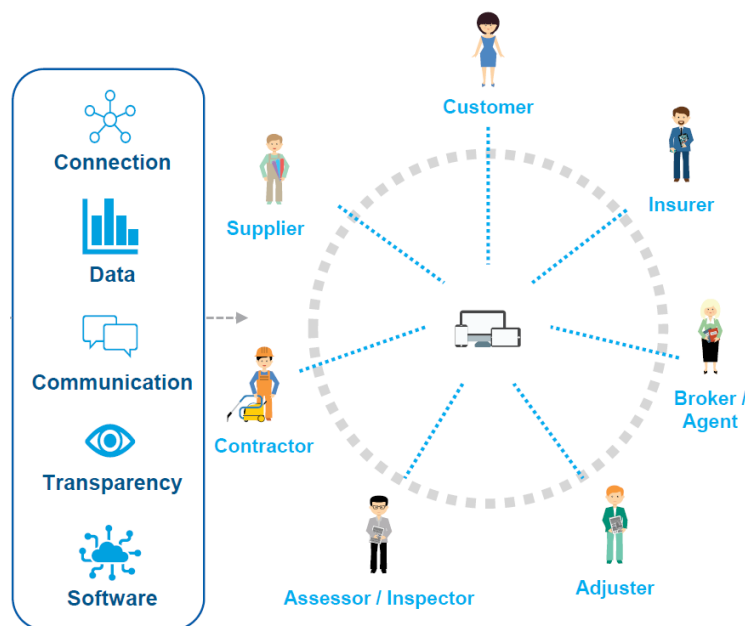
Modern slavery describes situations where offenders use coercion, threats or deception to exploit victims and undermine their freedom. It encompasses human trafficking, deceptive recruitment, forced labour, debt bondage, forced marriage, slavery, servitude, child labour, and other kinds of exploitation that violate a person's human rights and dignity.

CCC rejects any form of modern slavery and is committed to ensuring that its people, partners and suppliers operate in accordance with all applicable laws, in particular those laws prohibiting human slavery including servitude, human trafficking, forced labour and marriage, child labour and debt bondage.

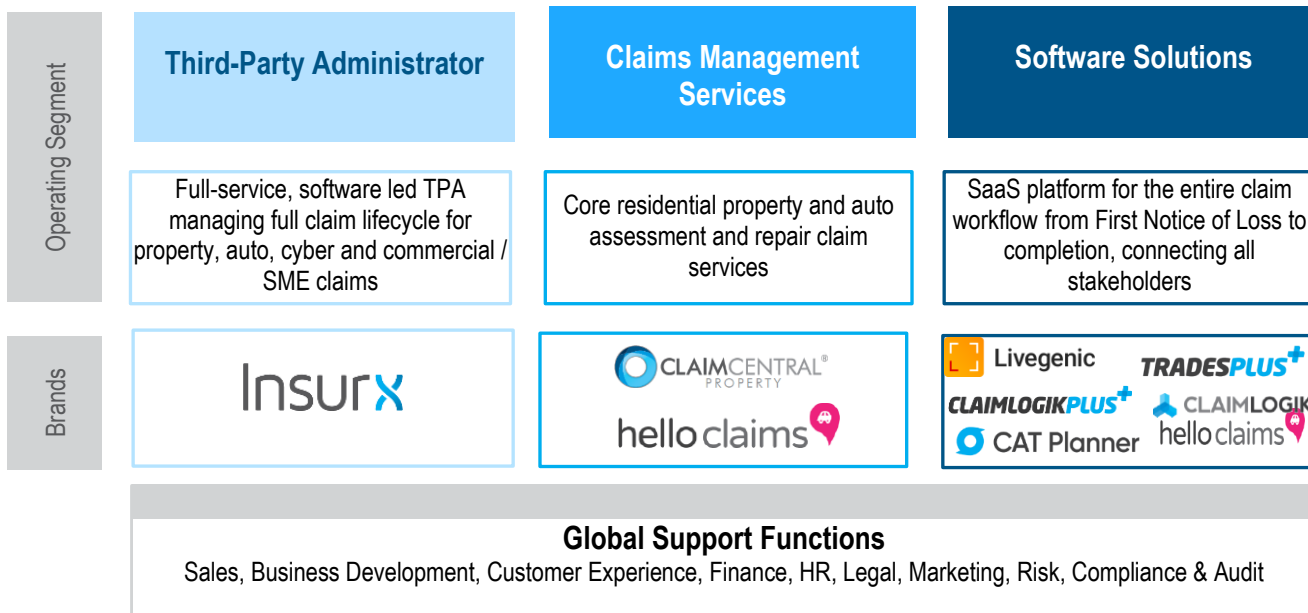
CCC recognises the importance of protecting the human rights of all people, including its employees and those within its supply chain. This Statement sets out the steps CCC has taken and the steps CCC proposes to take as it embarks on a journey to reduce the risk of modern slavery in its operations and supply chain.

## Our business

CCC is a global provider of claims solutions. CCC provides a digital first claims management experience connecting all stakeholders in an insurance claim, including insurers, brokers, managing agents, customers, assessors, adjusters, suppliers and contractors.

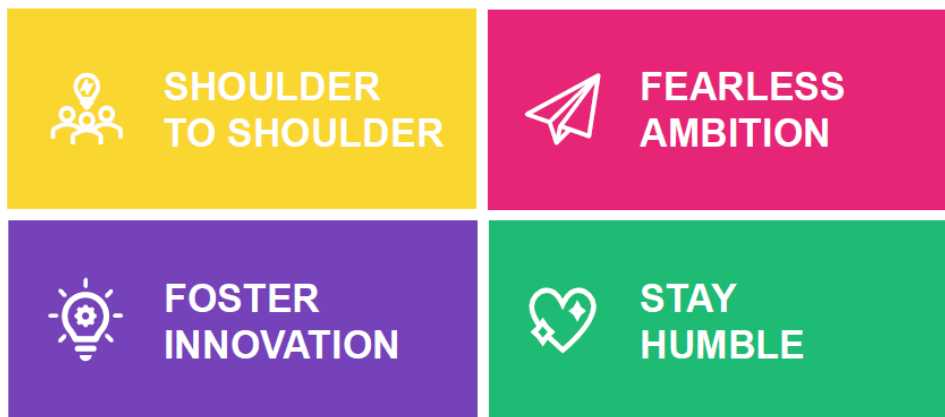


CCC has three main operating segments, represented by various brands, along with centralised global support functions.



### Vision, mission and values

CCC is a connected claims solutions company whose daily mission is to deliver digital, data-driven, people-focused solutions to achieve its vision of revolutionising the insurance claim experience by living its company values of:



CCC operates through eight offices across Australia, United States, New Zealand and South Africa and has 327 employees globally with the majority (91%) of employees located in Australia.



### CCC policies on modern slavery

CCC's supply chain is critical to its success and growth. CCC is committed to ensuring it is not supplied by anyone who engages in modern slavery.

In order to deliver on its commitment, CCC has policies in place which set out the conduct CCC expects of officers, employees, partners, contractors and suppliers. CCC's Modern Slavery Policy has been approved by Management, and the Group Chief Executive Officer has overarching responsibility for the Modern Slavery Policy. A team led by CCC's Head of Risk, Compliance & Audit and General Counsel and Company Secretary implements the Modern Slavery Policy.

CCC requires all its suppliers to act responsibly and abide by the laws and regulations of the jurisdictions where they operate. CCC has a zero-tolerance approach to modern slavery and will continue to review and strengthen its modern slavery frameworks, processes and systems to minimise the risk of modern slavery across the CCC group. CCC's Modern Slavery Policy reinforces the responsibilities and standards expected within the CCC group and its supply chain.

CCC also has a Whistleblowing Policy, which is available to all officers, employees, partners and suppliers. If employees, partners and/or suppliers have concerns about any wrongdoing or breaches of law, they can raise these concerns as part of CCC's whistleblower process.

As part of its ongoing commitment to combating modern slavery, CCC regularly reviews its group level and subsidiary level policies, including but not limited to, the Code of Conduct, Whistleblowing Policy, Workplace Health and Safety and employment and recruitment policies. CCC ensures that its policies are embedded in its operations by taking steps to raise awareness of the requirements and engaging with employees, partners and suppliers.

### Modern slavery risks

CCC operates in the insurance and insurance claims industries which traditionally have a low risk of modern slavery. Further, the majority of CCC's employees are located in Australia, a low-risk jurisdiction for modern slavery. However, although CCC's direct business operations are low risk some aspects of CCC's supply chain, such as its property repairer supply chain, can be at a slightly elevated risk exposure.

CCC understands that modern slavery risk can occur in its Australian and overseas operations and supply chains. Identifying and assessing that risk is key to reducing, mitigating and remediating potential harm that could be caused through modern slavery. Increased risk of modern slavery exists in certain geographic locations and sectors.

During the reporting period CCC undertook a risk assessment on its supply chain. As part of its risk assessment process CCC referred to third party resources including the 2018 Global Slavery Index, the US Department of Labour List of Goods Produced by Child or Forced Labour and Business and the Human Rights Resource Centre to identify suppliers with higher risks of modern slavery in CCC's supply chain.

CCC undertook the following due diligence on its supply chain based on an initial assessment of sector and industry; geographic location and identified risks (including poor governance structures, vulnerable populations; high risk business models; high risk categories; and high-risk geographies):

- Desktop Assessment: To identify modern slavery indicators and review of contractual arrangements in its supply chain; and
- Enhanced Due Diligence: For any identified higher risk suppliers, in addition to the Desktop assessment review of nature and geographic source of goods and services; employment practices and modern slavery risks (if any) identified.

Where multiple high-risk factors co-exist, there is a higher likelihood that actual harm is being experienced and if identified in CCC's supply chain CCC will implement additional controls to ensure that risk does not become harm.

The property repair industry is at a higher risk of modern slavery as there is high demand for low skilled workers, limited transparency around the supply chain where there is subcontracting and outsourcing involved, and low-tier suppliers operating in high-risk geographies. The types of exploitative labour practices and breaches of human rights that can give rise to situations where modern slavery risks increase include forced or unpaid work; unsafe conditions; bonded and child labour; inadequate accommodation; passport confiscation; and human trafficking.

Some aspects of building services procurement, such as cleaning, can carry base-skill labour risks where there is higher risk of forced labour and trafficking practices.

CCC's supply chain includes services and products which contribute to the direct supply of its services to its clients and also services and products which relate to office facility services and supply i.e., cleaning and IT equipment across Australia, New Zealand, United States and South Africa.

Products and services provided by suppliers to CCC include supply of facilities services (cleaning, security, maintenance suppliers), professional consultancy and advisory services, IT providers (software, IT hardware and consultancy), recruitment services, accommodation and transport services, as well as insurance.

Products and services provided by suppliers to CCC's core operations include professional services of insurance intermediaries; brokers; loss adjusters; investigators; building and restorative services; retail product suppliers; mechanics; surveyors; smash repairers; vehicle hire; and transport services, accommodation and other claims service intermediaries.

CCC requires suppliers and partners contractually to perform their services to CCC in accordance with relevant laws. New contractual provisions have been developed to monitor modern slavery risks of suppliers and their supply chains and require adherence to modern slavery laws as well as training on modern slavery.

CCC's supply chain is made up of approximately 1,945 suppliers with an annual supply chain spend of A\$109.4 million with its directly engaged suppliers. These suppliers are primarily located in Australia. CCC recognises however, that the countries where it procures goods and services may not always represent the country of origin of the goods or services.

<b>Key services</b>	<b>Property Repair &amp; Restoration</b>	<b>Motor Repair</b>	<b>Operational management</b>
<i>Supply Chain</i>	<ul style="list-style-type: none"> <li>- repairers</li> <li>- restorers</li> <li>- assessors</li> <li>- loss adjusters</li> <li>- quantity surveyors</li> <li>- content replacement providers</li> <li>- investigators</li> <li>- accommodation</li> </ul>	<ul style="list-style-type: none"> <li>- repairers</li> <li>- assessors</li> <li>- loss adjusters</li> <li>- vehicle hire</li> <li>- investigators</li> <li>- transport</li> </ul>	<ul style="list-style-type: none"> <li>- IT services</li> <li>- payroll service providers</li> <li>- office supplies</li> <li>- building services</li> <li>- courier service</li> <li>- consulting services</li> <li>- legal services</li> <li>- audit services</li> <li>- banking services</li> <li>- transport &amp; travel</li> <li>- accommodation</li> </ul>



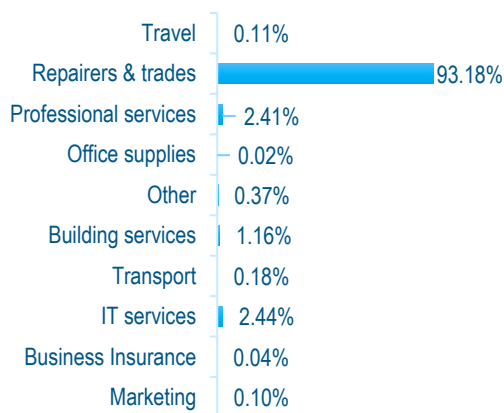
1,945 suppliers



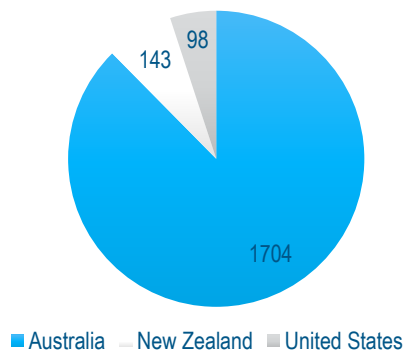
A\$109.4M annual supply chain spend



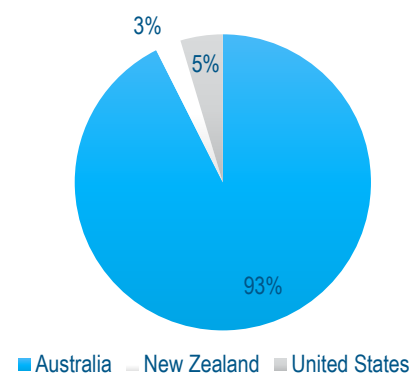
42,957 invoices raised



Spend by category



Suppliers by region



Supply chain spend by region

## Consultation

CCC consulted with its subsidiaries and suppliers to raise awareness of modern slavery reporting requirements and discuss actions to map supply chains and assess risks of modern slavery across the CCC group. The consultation process included:

- Discussions with Management on modern slavery reporting requirements, obligations and compliance program.
- Discussions with Management with respect to operations, mapping of supply chain and risk assessments undertaken across the CCC group.
- Development of risk assessment processes and due diligence for suppliers.
- Development of modern slavery clauses for use in contractual arrangements with suppliers; clients and partners.
- Identifying training modules for employees and conducting information sessions.

## What CCC is doing

CCC's working practices respect and uphold human rights for its partners, employees, contractors and supply chain. CCC is taking the following steps to continue to identify risks of modern slavery within the CCC group and its supply chain:

- CCC complies with all local and international labour laws where it operates.
- CCC assesses risk related to modern slavery associated with its supply chain. CCC's ongoing assessments will be based on geography, the product or services being purchased, supplier quality performance and the nature of the business transaction.
- CCC carries out due diligence on all suppliers including requesting information on policies and procedures on sourcing of goods and services, and employment practices. In respect of certain suppliers, CCC seeks the right to request and receive copies of policies or procedures.
- CCC has a Code of Conduct that it requires all suppliers to adhere to. The Code of Conducts sets out the standards CCC expects its suppliers to uphold at all times including anti-bribery and corruption, human trafficking, slavery, and ethical behaviour.
- CCC will introduce an annual supplier recertification process where suppliers will be required to reconfirm their adherence to the CCC Code of Conduct.
- Standard modern slavery clauses will be included in all contracts.

- CCC has commenced a program of training on modern slavery that is available to staff as part of induction. Training on modern slavery is mandatory for all employees, including those involved in human resources and procurement.
- CCC will audit suppliers for ongoing compliance.

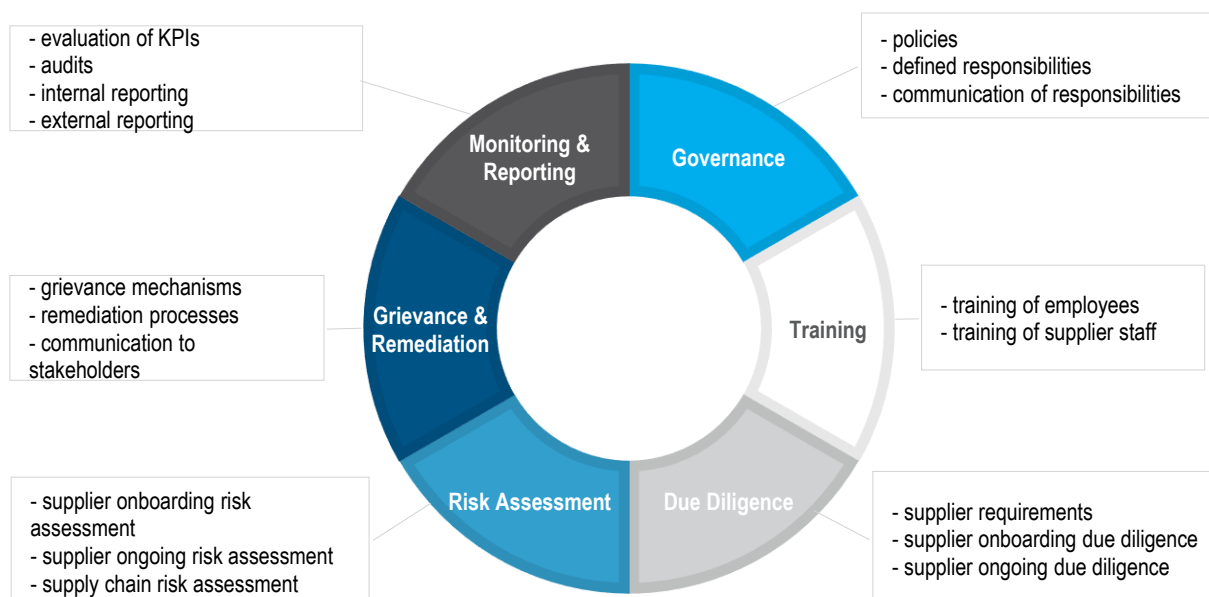
### Continuous improvement

CCC reinforces its commitment to preventing modern slavery from taking place within its business and supply chain through the following actions:

- Affirmations against human trafficking, forced labour, and child labour, similar and consistent with this Statement, into the Code of Conduct.
- Requires employees to complete an annual compliance confirmation to the Code of Conduct, both as a new employee and annually thereafter.
- Performs due diligence on its existing business partners and suppliers, as with future potential business partners and suppliers to ensure suppliers share CCC's approach to human rights and working conditions.
- New supplier onboarding processes to include globally standardised due diligence checks to ensure suppliers are committed to complying with local labour standards and assess the suitability of suppliers that provide services to CCC.
- Expects its suppliers to comply with all applicable safety and health laws and regulations in the countries in which they operate. CCC is introducing a new Health and Safety Contractor Management Program which provides training to all panel repairers and their contractors, as well as our property assessors. This includes Health and Safety spot checks on site, as well as in the panel repairers' offices, with a focus on high-risk areas including working at heights; safe work method; tested and tagged electrical; and safety data sheets stored for chemicals. The program is being implemented for all property panel repairers and will be expanded across the network.
- Provides a telephone hotline and electronic reporting mechanism, including an anonymous option, to every employee in order to report any concern through its Whistleblowing process. CCC also has a strict anti-retaliation process in policies to protect employees who report a concern.

CCC's journey to building a comprehensive approach has commenced and it continues to build and embed supporting processes and systems to manage modern slavery risks across its operations. CCC's model for a comprehensive approach to managing modern slavery is shown below.

### Our approach to modern slavery



## Measuring effectiveness

For the financial year 1 July 2019 to 30 June 2020, CCC had no reported incidents of any modern slavery or human trafficking in its supply chains.

Indicators to measure effectiveness of CCC's modern slavery compliance also include the following:

Focus Area	Indicator	Result
Modern Slavery	No. of employees completing Modern Slavery training	327
Conduct	No. of employees completing CCC induction	113
Conduct	No. of employees completing Appropriate Workplace Behaviour training	279
Workplace Health & Safety	No. of employees completing Corporate WHS training	327
Workplace Health & Safety	No. of employees completing Safety Operating Procedure training	213
Workplace Health & Safety	No. of employees completing Contractor Compliance training	7
Reporting	No. of modern slavery concerns raised through the Whistleblower program	0

Whilst CCC is satisfied with the steps that it has taken to date to combat slavery and human trafficking, CCC understands that modern slavery is ever-changing and that its approach must evolve to remain effective. CCC will audit its supplier onboarding process, in order to monitor the efficacy of CCC's processes to mitigate the risks of modern slavery, better ensure that slavery and human trafficking is not taking place in any part of its supply chains and to strengthen its suppliers' commitment in stamping out modern slavery in their own organisations.

## COVID19

During the COVID-19 pandemic, CCC worked closely with its suppliers to agree the new ways of working. Support was provided to suppliers to help them through the changes to CCC's operations, in particular with meeting new workplace health & safety requirements. This collaborative effort strengthened relationships with key suppliers. There were no significant COVID-19 related issues reported by suppliers during the reporting period.

## Approval

This Statement has been approved by the Board of Claim Central Pty Ltd and the Board of Claim Central Consolidated Pty Ltd.

Signed for and on behalf of the Board of Claim Central Consolidated Pty Ltd and the Board of Claim Central Pty Ltd



### **Brian Siemsen**

Group Chief Executive Officer  
Director Claim Central Consolidated Pty Ltd  
Director Claim Central Pty Ltd